



# Penrith City Council Submission

**Broader Western Sydney  
Employment Area Draft  
Structure Plan  
26 August 2013**



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## Executive Summary

The draft *Structure Plan for the Broader Western Sydney Employment Area* (BWSEA) provides a welcome advancement in the development of strategic planning to guide the future for Western Sydney.

The vision for BWSEA is to strengthen the economic growth of NSW and increase job opportunities for Western Sydney along with bringing a variety of job options in areas where the population lives. Investing in Western Sydney is an economic opportunity to deliver sustainable growth and address current disadvantage. Jobs and infrastructure delivery are the principal challenges for Western Sydney.

The NSW Government's *Draft Metropolitan Strategy for Sydney 2031* (Draft Metropolitan Strategy) projects that Sydney requires approximately 600,000 additional jobs over the next 20 years to meet the employment needs of its growing population. BWSEA plays a critical role in reaching this employment target as it is nominated as one of nine key "City Shapers" in the Draft Metropolitan Strategy.

While it is encouraging to note that the Government intends to provide 50% of all new jobs in Western Sydney, it will not redress the demands of past growth. Western Sydney will still be burdened with a 280,000 jobs gap<sup>1</sup> by 2031. If the current disadvantages are to be arrested, it is imperative that the Government intervene and play an active role in attracting and supporting investment in BWSEA through the preparation of a Growth Infrastructure Plan and following this more detailed Precinct Planning. The local government area boundaries should be realigned to include all of the expanded WSEA within Penrith City Council to secure a coordinated approach to infrastructure investment, delivery and planning.

Previous mechanisms to kick start development of employment land have been very basic and simply provided an appropriately zoned quantum of land. BWSEA presents an opportunity to learn from the past and implement the planning strategies that will result in real gains for Western Sydney. An emphasis in BWSEA on high employment generating developments that provide 'jobs of the future' is crucial to addressing the employment demands of past and planned growth.

*"Sydney requires approximately 600,000 additional jobs"*

*"Western Sydney will be burdened with a 280,000 jobs gap by 2031"*

*"...high employment generating developments that provide 'jobs of the future'..."*

*"BWSEA presents an opportunity to learn from the past and implement the planning strategies that will result in real gains for Western Sydney"*

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<sup>1</sup> Western Sydney Employment lands Investigation Area: Rebuilding Sydney's Economy by  
2021 May 2012, Cox

BWSEA will need to be focused on the identification of emergent industries and the identification of the best role it can play in a very specific way to generate the benefits for Western Sydney. Penrith City Council welcomes the systemic approach being undertaken by the Department of Planning & Infrastructure not only to providing sufficient land but also delivery of a Growth Infrastructure Plan and Precinct Planning. To facilitate this, the NSW Government is urged to form a Taskforce charged with the direct responsibility to ensure catalytic projects are facilitated along with significant development incentives for BWSEA.

Council appreciates the opportunity to comment on the draft Structure Plan and we urge that the issues and comments raised in our submission be taken into consideration in finalising the Plan.

*“The NSW Government is urged to form a Taskforce charged with the direct responsibility to ensure catalytic projects are facilitated along with significant development incentives for BWSEA”*

# Draft Structure Plan for the Broader Western Sydney Employment Area

Penrith Council welcomes the State Government's plans for expanding WSEA and the draft Structure Plan that provides the guiding strategic plan that will strengthen economic growth in NSW and increase job opportunities for Western Sydney.

It is reported that each day approximately 200,000 people commute from Western Sydney to the east for work. The magnitude of this movement of people results in significant queues on trains and buses not to mention the substantial traffic delays along Sydney's major arterial roads. This situation will be exacerbated by the forecast amount of residential growth predicted for Western Sydney. The Urban Taskforce estimates that commuter movement from west to east may increase from 200,000 to 300,000 in the next 20 years if nothing is done to provide employment opportunities in Western Sydney. The significant and well-documented jobs gap is one of the biggest issues currently facing Western Sydney.

Developing visions and setting targets does not in itself result in the delivery of desired outcomes. Other barriers such as difficulties with infrastructure provision and availability of finance impede their timely delivery. The concurrent preparation of land use, transport and infrastructure strategies that inform the preparation of a Growth Infrastructure Plan will provide a framework to address these barriers. The work currently being undertaken by the Department of Planning & Infrastructure which will feed into a proposed Growth Infrastructure Plan and future Precinct Planning is advocated by Penrith City Council. The delivery of infrastructure needs to be incentivised through recognition that growth is a State priority. This work is essential to inform future bids to Treasury and without building this essential foundation the potential of BWSEA will not be attained.

It is imperative that the Government intervene and play an active role in attracting and supporting investment in the proposed expansion to WSEA. Delivery of new enterprise and employment areas requires much more than the zoning of land. It will also be important for the Government to commit to the early provision of critical infrastructure for the BWSEA to catalyse investment.

In the next phases of planning and through detailed precinct planning, employment density targets should be set and reported upon so the success of Precinct Planning can be measured from the outset. A clear pathway for review must be established to ensure BWSEA is providing employment targets that reduce the significant jobs gap in Western Sydney.

## Recommendation

1. The BWSEA Draft Structure Plan and resultant Growth Infrastructure Plan be used to inform and direct the NSW State Budget priorities. An infrastructure plan that provides 10-15 year forward funding is required.
2. The NSW Government lead development through strategic investment in infrastructure.
3. A Taskforce be formed within the NSW Government which is led by the Minister for Western Sydney to deliver on a firm budgetary commitment and implementation strategy for BWSEA. The Taskforce should have local government representation.
4. An employment strategy which provides a review and reporting mechanism should be established for the development of BWSEA. The employment strategy should set job targets including job sector targets for Western Sydney as these are not static and must be reviewed as population in the region grows.

## Re-alignment of Penrith City Council's Boundary

Penrith City Council welcomes the opportunities and challenges associated with BWSEA. Four Local Government Areas cover the proposed expansion to WSEA. Penrith comprises 5,719 hectares (53%), Liverpool 3,494 hectares (33%), Blacktown 1,075 hectares (10%) and Fairfield 410 hectares (4%). The land included in the expanded WSEA is predominantly within Penrith City Council.

In the Metropolitan Strategy, Penrith is grouped with Blue Mountains and Hawkesbury local government areas in the West Region. This Region requires the inclusion of ample employment and enterprise areas through which to plan, shape and influence its economic sustainability and density. The Region is currently vastly underserved with employment lands.

The BWSEA is of such strategic significance to Sydney's and Western Sydney's economic destiny as to warrant the very best delivery framework. While it is possible to work around circumstances where development straddles different local government areas, to do so inevitably introduces complexities, compromises and inefficiencies. Case examples include:

1. Erskine Park Link Road – this project runs from Penrith local government area through to Blacktown local government area to connect Erskine Business Park to the M7. The project was a low priority for Blacktown Council. Project delivery was profoundly delayed beyond the timeframe within which a single authority could have advanced it.
2. Parramatta Road – masterplanning and co-ordination of re-development has been impossible because of the multitude of local government areas which Parramatta Road traverses.
3. Epping Town Centre – this town centre straddles two local government areas which has hampered planning and revitalisation.

Incorporating BWSEA wholly within one local government area would assist the planning, administration, coordination and delivery of this important "City Shaper". The draft Metropolitan Strategy identifies BWSEA as a 'metropolitan priority' for the West Subregion. Containing it wholly within the one local government area will provide the economic mass critical for the success and sustainability of the BWSEA.

With the release of the White Paper and proposed changes to the NSW planning system, State Environmental Planning Policies will no longer be available. In the absence of this mechanism to coordinate planning controls and the delivery of the employment area, it is strongly recommended the entire area be included under Penrith City Council's management to ensure there is a coordinated planning approach to development.

Consolidating BWSEA into Penrith City Council would be the most efficient way of ensuring delivery of infrastructure.

### Recommendation

5. The Department of Planning & Infrastructure submit to the Review of Local Government that local government area boundaries be re-aligned to include all of the proposed Broader Western Sydney Employment Area within Penrith City Council.



## Employment Opportunities

Expanding WSEA to create BWSEA is a significant step in providing land for employment, moving a step closer to addressing the undersupply of jobs in Western Sydney. Council's Employment Planning Strategy for the City has also recognised the growing shortfall in jobs.

The draft Structure Plan says that 57,000 new jobs are expected to be created in the employment area over the next 30 years with approximately 36,000 of these jobs in the industrial sector and 21,000 office based jobs. The job numbers provide a good starting point but should be increased particularly when considering the expected population growth in Western Sydney. These targets will only be achieved with the correct detailed planning, catalyst projects, infrastructure investment and ongoing funding mechanisms.

BWSEA must deliver the quantum of jobs as well as the variety to suit the growing populations of Western Sydney. Diversity can be achieved by setting minimum jobs targets, focusing employment in strategic centres and specialised precincts. These actions are essential in delivering the vision of a strong global and liveable Western Sydney.

It is reported that higher density employment uses including office based uses may take time to develop and evolve in BWSEA over the next 20 to 30 years as this is the typical evolution of business park type development seen in areas such as Norwest. In the interim it is critical that appropriate locations for higher intensity employment are identified so that opportunities for these developments are not precluded from evolving as market demand emerges.

### Recommendation

6. BWSEA must deliver the quantum of jobs as well as the variety in employment opportunities to suit the needs of the growing population. An Employment Strategy should be adopted which sets jobs targets
7. Employment typology that is not currently available in the region should be provided. This includes sectors such as educational research, information technology, telecommunications and other business enterprises.
8. The Department of Planning & Infrastructure should work with the NSW Department of Trade & Investment through a newly formed Taskforce to build capacity into the proposed employment lands to encourage local and global investment.
9. BWSEA must provide high intensity employment providing for industrial development but with a high proportion of supportive office space and higher technology type employment generators. An employment strategy, as included in recommendation 4 should clearly define the employment targets. The strategy must allow for review of employment targets as the population grows in Western Sydney.
10. Land should be identified for higher density employment in the draft Structure Plan so that it is not precluded from being developed when the market demand evolves.

## Specialised Centres

Penrith City Council strongly advocates the proposed specialised centres within BWSEA. Penrith comprises an existing specialised centre in the Penrith Health and Education Precinct. The Penrith Health and Education Precinct currently employs approximately 4,000 people and with planned government support will deliver approximately 12,000 jobs over the next 20 years. In 2013 the Penrith Business Alliance reported that 1 in 4 new jobs created in Penrith over the past decade have been generated within the Health and Education Precinct. The proposed expansion of BWSEA operates in parallel to Penrith Health and Education Precinct and demonstrates that strategic investment in a particular specialised centre can achieve significant benefits.

Given the active rural land uses proposed to be included in BWSEA, Penrith City Council sees a great opportunity to build on this local industry and to develop the agricultural industry into more contemporary and cutting edge areas. An agribusiness centre may be ideal for BWSEA to provide for commercial agriculture using advanced technology. An agribusiness centre may support businesses that supply farms (e.g. seeds, farm machinery, agrichemicals). An agribusiness specialised centre provides opportunities to leverage into areas such as intensive agriculture or industrial agriculture.

There are also opportunities to support agricultural education, research and development as well as farms on the floodplain and intensive agricultural enterprises which could also include a proposal to re-locate a facility such as Flemington Markets closer to Western Sydney's agricultural land.

The ultimate location of specialised centres needs to be based on access to key infrastructure including motorways, passenger rail and freight rail. Further ground truthing of the proposed locations shown in the draft Structure Plan needs to be carried out to inform the detailed Precinct Planning stages for BWSEA. Ground truthing should consider land use constraints including topography, biodiversity, view corridors, acoustic buffering and flooding characteristics.

### Recommendation

11. Specialised centres are essential to the functioning of BWSEA to ensure higher density employment uses are attracted to the area.
12. Further ground truthing needs to be carried out to ensure the correct location is chosen for any proposed specialised centre. These centres need to be strategically located in terms of proposed access corridors, otherwise the success of these centres may not be realised.
13. A set of targeted incentives for desirable specialised centres should be developed including to encourage a potential agribusiness centre in BWSEA.



## Land Use Planning

Expanding WSEA as a successful employment cluster will make a significant contribution to closing the jobs gap in Western Sydney.

In the past planning controls for the existing WSEA have precluded essential support services such as offices and childcare centres from being developed, by arbitrary prohibition of these land uses. This rigidity to planning controls is undesirable and flexibility is needed to enable BWSEA reach full potential. Recognition is required in the planning strategies so that support services and facilities that will be required to support employment activities such as childcare, local retail and medical are permissible land uses.

Government cannot fund everything required to create a sustainable cities or regions of the future. The planning system should facilitate entrepreneurs and their concepts to the extent that they can through their development to deliver enhanced outcomes of public benefit.

Through planning controls BWSEA must be able to offer incentives to businesses to locate in BWSEA including tax concessions (such as stamp duty), concessional leases on government owned land and fast tracked planning approvals. Other incentives can also be embedded in planning controls such as floor space ratio bonus or height bonuses where proposed development provides a desirable business enterprise opportunity.

### Recommendation

14. Develop new Mixed Use Employment Centre zones with a suitable mix of industrial, commercial and support services permitted in the zone.
15. Development of planning controls that offer incentives to businesses to locate in BWSEA including tax concessions, concessional leases on government owned land and fast tracked planning approvals.
16. A programme of targeted incentives is recommended which may include setting floor space or height bonus for developments that provide higher intensity employment developments.

## Catalyst Projects and Funding Incentives

Possibly the biggest challenge to ensure the full potential of BWSEA is realised, is kick-starting development through infrastructure funding. The scale of the land uptake and distance to existing urbanised areas results in extensive upfront infrastructure costs.

Previous development models such as State Environmental Planning Policy (Western Sydney Employment Area) 2009 have not been effective in delivering the number of jobs required to serve Western Sydney into the future. A new way of thinking and a new model for delivery of these employment lands is needed. Mechanisms for delivery of the much needed employment lands may include:

- Upfront Government funding and delivery of critical infrastructure
- Review and coordination of local Section 94 Plans to provide local infrastructure
- State Infrastructure Charges or a new Western Sydney Infrastructure Fund
- Government funded catalyst projects such as a specialised centre for agribusiness
- Tax incentives
- Reduced cost leases for Government owned land.

Penrith City Council firmly supports the use of catalyst projects including catalyst infrastructure projects that should be funded by Government such as the intermodal facilities, Outer Sydney Orbital, freight rail and early NBN rollout. It is important to consider when development levies or charges including a potential Western Sydney Infrastructure Fund that these mechanisms do not impact on the economic viability and competitiveness. These mechanisms must be balanced so they do not result in the stifling of development and investment in BWSEA.

### Recommendation

17. A series of catalyst projects should be launched and encouraged by Government.
18. The NSW Government should show continued leadership and commitment to bringing together key stakeholders to create momentum needed for catalyst projects and infrastructure.
19. Penrith City Council supports a new Western Sydney Infrastructure Fund for development that will kick start development of BWSEA.
20. Although the draft Structure Plan makes reference to the future development of Commonwealth Land at the former Badgerys Creek airport site a decision by the government to move forward with an airport would have significant implications for the draft Structure Plan for BWSEA. Council therefore would request the draft Structure Plan be reviewed in the case that a decision is made by the Federal Government on the airport site.

## Infrastructure and Services

The timely roll out of infrastructure is essential to support investment and the delivery of jobs. Intrinsic to this objective is the identification of funding mechanisms and co-ordination of service providers, particularly government agencies. A Growth Infrastructure Plan (GIP) is critical to inform the NSW Government's budget allocation processes.

Intra-regional, multi-modal transport links are required to facilitate access to and from the precinct. Reservation of key corridors of land is required to provide for future development of the Outer Sydney Orbital with grade separated road interchanges at key access connections to serve regional travel, the north-south rail link and freight. Linking the precinct to the M4/M7/M5/M9, the broader rail network and Penrith to the South West and North West Growth Centres will be critical. Development of the precinct would be facilitated by connection to the national/state freight network. Such connections also provide the opportunity to locate two inter-modal freight terminals within the precinct. The structure plan should also identify a link from BWSEA back into Penrith railway station via a dedicated transit way.

The primary east-west road connecting Luddenham Road to Wallgrove Road is supported in principle on the proviso that adequate separation is provided to Bakers Lane where it services existing educational facilities. The draft Structure Plan should include an additional primary east-west road connecting to the M7 between Elizabeth Drive and old Wallgrove Road. Council does not support the use of Old Wallgrove Road as the primary road connecting to the Wallgrove Road/ M7 via the existing interchange. This interchange is not meeting the existing demand and will not be able to cope with additional traffic generated by development within BWSEA.

BWSEA must be connected to the National Broadband Network. This is an essential component of infrastructure and should be treated with the same priority as other essential services including water and electricity.

### Recommendation

21. The Structure Plan must reserve adequate land for the Outer Sydney Orbital in a dedicated access corridor. The access corridor should provide sufficient land for all modes of transport including motorway, passenger rail and freight rail transport.
22. BWSEA must be connected to both national and state freight networks. Freight rail connection is being considered to the south through to Port Kembla, however a connection should also be considered to the north and through to Newcastle.
23. An additional primary east-west road connecting to the M7 between Elizabeth Drive and Old Wallgrove Road should be provided and nominated on the draft Structure Plan.
24. The NSW Government must commit to the delivery of both intermodal facilities including the second intermodal facility on the western side of BWSEA to service freight rail from Port Kembla and Newcastle associated with the Outer Sydney Orbital.
25. The structure plan should also provide a link from BWSEA back into Penrith railway station via a dedicated transit way.
26. Provision to be made so the BWSEA receives early connection to the National Broadband Network.
27. Bakers Lane should be retained as a service road only.
28. Connect BWSEA to both North West and South West Growth Centres providing an integrated network link.

# Visual Impact Analysis

Protecting the existing character of rural areas both within the proposed employment land and land that lies within and adjacent to BWSEA is an important consideration. This is particularly relevant for the community living in Twin Creeks as this sits within the boundaries of BWSEA. Other important views to be considered include the Mulgoa Valley and the Blue Mountains Eastern Escarpment. One of the proposed specialised centres is located in the Aldington Road precinct. This area is located on a high ridgeline known for its steep local topography, and future development will need to ensure the visual impact on adjoining rural/residential areas is minimised.

Further visual analysis needs to be undertaken to inform the location of proposed zone boundaries and reservation of land (visual buffers) to protect important view corridors.

Land should be reserved for the protection of important visual and scenic characteristics within the BWSEA. These corridors may serve a dual purpose for biodiversity conservation and acoustic buffering for sensitive land uses. A co-ordinated approach is important to deliver a balanced outcome for BWSEA. It would not be appropriate to delay further visual analysis until the development application stage. A broader strategic approach to visual analysis is critical to ensure the appropriateness of future development. Particular consideration needs to be given to the compatibility of land use and development form along ridgelines bounding BWSEA.

## Recommendation

29. Further visual impact analysis of the proposed BWSEA should be carried out particularly to ensure the visual impact of future employment land development is minimised.
30. Key view corridors and areas with scenic and landscape values should be identified and protected within the draft Structure Plan.

## Environmental Constraints

Native bushland in particularly biodiversity corridors and areas of remnant indigenous vegetation are key components of the natural systems in the BWSEA. Biodiversity corridors provide habitat for native species as well as forming part of the landscape character of the existing area. The protection and rehabilitation of biodiversity corridors between areas of remnant indigenous vegetation help maintain biodiversity and the integrity of ecosystems. Fragmentation and isolation of habitat reduce the diversity and viability of flora and fauna populations.

Penrith City Council understands the Department is already undertaking further detailed study of the biodiversity characteristics of the subject land. It is important that this further study looks at biodiversity and riparian assessment which can translate into the mapping of environmentally sensitive land. The studies should also look at Cumberland Plain Priority Conservation Lands.

Consideration should be given to maintaining and improving vegetated riparian zones and corridors along all waterways, particularly Cosgroves, Badgerys, Kemps, Ropes and South Creeks. Opportunities to establish a biodiversity corridor along South and Ropes Creeks in particular and joining Western Sydney Parklands should be investigated.

Further detailed mapping should clearly show where the greatest biodiversity constraints lie to inform the next stage in the planning process being Precinct Planning.

Penrith City Council also understands that further work is being undertaken in terms of understanding flooding characteristics and water studies. These reports remain cabinet in confidence at this stage. These technical studies should inform the proposed zoning of land employment land and development related flood controls. The flooding analysis must consider the entire catchment area including potential flow on impacts to St Marys, Berkshire Park, Llandilo, Windsor and the Stony Creek Road Causeway. The development area contains flood affected land and accessways. Access and in particular flood evacuation access should be maintained.

## Recommendation

31. Detailed study, ground truthing and mapping of environmentally sensitive areas including mapping of Cumberland Plain Woodlands, Cumberland Plain Priority Conservation Lands, riparian zones and high conservation value lands would need to be completed to inform proposed zoning.
32. Environmental conservation zoning should be included in future planning strategies to ensure land with the highest conservation value is protected. Future planning strategies must consider how (biodiversity) off-sets would be managed if vegetation is to be removed.
33. Flooding analysis for the total catchment within BWSEA as well as the broader catchment down to Windsor should be undertaken to inform future zoning of flood prone land and flood related development controls.

The Department should be aware that Council in conjunction with other adjoining councils and Office of Environment & Heritage are nearing finalisation of a regional flood study for the South Creek catchment. The planning for BWSEA must be consistent with the strategies and principles identified in this study.

## Conclusion

Penrith City Council strongly supports the proposed expansion to the existing WSEA and the objectives that underpin the draft Structure Plan for BWSEA. The Department of Planning & Infrastructure should be commended on efforts to date in drafting the BWSEA Structure Plan.

Continued leadership by the NSW Government and formation of a new Taskforce is imperative so that Government can play an active role in attracting and supporting investment in BWSEA. The Minister for Western Sydney should take an active role in leading this taskforce to ensure Treasury makes a firm commitment to delivery on the implementation strategy being developed by the Department of Planning & Infrastructure.

Western Sydney's growth has and continues to pose many challenges. Too many people are distant from jobs and previous planning strategies have not done enough to redress this imbalance by locating new homes closer to, or connected to those jobs. The draft Metropolitan Strategy proposes to locate 70% of population growth in Western Sydney but only 50% of new jobs in Western Sydney.

The lessons learnt from past growth are the catalyst for change. The zoning of land has, in the past, been seen to be the central vehicle for delivering jobs in Western Sydney. This has not delivered the employment opportunities for Western Sydney.

Completing and implementing this draft Structure Plan BWSEA, with an emphasis on high employment generating developments which may come in the form of specialised centres that provide '*jobs of the future*' is crucial to addressing the employment demands of past and planned growth.

BWSEA will need to be focused on the identification of cutting-edge industries and the identification of the best role it can play in a very specific way to generate the benefits for Western Sydney. There needs to be a systemic approach not only to providing sufficient land but also delivery of a Growth Infrastructure Plan, Precinct Planning, backing catalyst projects and development incentives.

Council appreciates the opportunity to comment on the draft Structure Plan and we urge that the issues and comments raised in our submission be taken into consideration in finalising the draft Structure Plan.



