

Wednesday, 4 August 2021

Warwick Winn
General Manger
Penrith City Council
PO Box 60
Penrith NSW 2751

via email: citystrategy@penrithcity.nsw.gov.au

Penrith Green Grid Strategy

Dear Mr Winn,

The Urban Development Institute of Australia, NSW (UDIA) is the leading industry body representing the interests of the urban development sector and has over 500 member companies in NSW. UDIA NSW advocates for the creation of Liveable, Affordable and Connected Smart Cities.

UDIA is pleased to provide a submission to Penrith City Council on the *Penrith Green Grid Strategy* (the Strategy). Further to the *Western Parkland City District Plan*, UDIA understands that Council is seeking to lead with the development of a Green Grid for their Local Government Area. Council's work on the Green Grid will then integrate into further District Plan space network strategies once enacted by NSW Department of Planning, Industry and Environment.

UDIA understands that Council is in the initial stages of Strategy implementation and short to medium term actions include review of mapping, drafting of planning and development controls and the investigation of funding opportunities for new open space to support the green grid.

We support measures by Council to deliver an interconnecting network of open space that will keep the city cool, encourage healthy living, enhance biodiversity, and ensure ecological resilience. However, we suggest that Council should address the following concerns before any planning policies are made, which may result in additional financial burdens placed upon development, which in turn may hinder housing supply and make the housing affordability crisis worse.

1. Proposed Planning and Design Provisions

In response to *Recommendation 5: Developing the Blue Grid & Water in the Landscape*, Council should avoid the adoption of excessive and impractical Water Sensitive Urban Design (WSUD) policies for greenfield subdivision. Often these policies can require new and innovative approaches to subdivision design (basin design, rain gardens, street verge and median design, open space irrigation etc) that are not tested for their cost to both the development and, most importantly for Council's long-term maintenance costs and durability. Policies of this nature can add significant capital and maintenance costs and land demand to implement stormwater treatment and detention infrastructure.

We are aware from our members who operate at Wilton in the Wollondilly Shire LGA, that proposed WSUD measures are resulting in development and design complexity.

Resolution of these issues is not progressing well and we urge Council to collaborate with industry on the preparation of any WSUD policies, so that they are fully tested for their viability (being impacts on land requirements, construction cost, maintenance requirements and contributions plans).

Further we support Council's approach to only focus on public areas to deliver Green Grid and not on private land. UDIA contends that relying on private landowners to deliver Green Grid obligations, such as tree planting programs and maintenance leads to significant landowner concerns on property damage, additional costs, insurance, overshadowing of solar panels and induced limitations on enjoyment and use of front and rear yards of dwellings.

2. Funding Penrith's Green Grid

In response to *Recommendation 2: Identify and access funding sources*, UDIA is acutely aware of the challenges facing Government in providing a Blue Green Grid at the Aerotropolis. There are presently insufficient developer contributions to support the Blue Green Grid and a review of infrastructure strategy is underway to achieve a more balanced contributions system and land use plan.

From our experience, the objective of Green Grids has a sustainability focus in the broader public interest. Thus, it is primarily a regional planning objective, and it is unreasonable that new home purchasers in greenfield areas such as those in the Penrith LGA should carry the burden of improving Greater Sydney's sustainability performance.

The implementation of the Green Grid, as an acknowledged priority, should be funded by State Government and less via local developer contributions. We note that this is currently what is being proposed as part of the Productivity Commission's review of the Essential Works List.

3. The future planning of South Creek

UDIA recognises that Council, in collaboration with other State and local government agencies, are aiming to improve the management of South Creek covering water quality and quantity and provide a green corridor with an open space recreation network that is biologically diverse. UDIA supports an integrated water cycle management approach to South Creek, which is underpinned by our strategy of keeping "Water in the West". This strategy, along with the proposed 'advanced water recycling centre' will increase re-use of wastewater for residential, business, irrigation, and environmental flows.

4. Development of sporting fields within proposed Green Grid areas

UDIA supports measures to integrate sporting fields into the Green Grid. The location of recreational and sporting fields within the Green Grid will reduce land sterilisation and allow a dual outcome of recreation and environmental conservation.

In summary, we support the following recommendations:

- 1) That Council engages with UDIA on workable solutions covering Water Sensitive Urban Design and tree planting, prior to drafting key planning and design provisions for new neighbourhoods.
- 2) That Council prioritises State grant programs as the main source of funding to develop the Green Grid.
- 3) That Council adopts an integrated water management approach to South Creek based on water reuse.
- 4) That Council maximises the location of sporting fields in the proposed Green Grid.
- 5) That Council works with State Government to connect their local Green Grid outcomes with proposed regional open and green connections for the Western Parkland City.

We support Council with their initiative to develop a Green Grid and point to successful examples of public domain tree planting programs enacted by industry and government at [Shell Point Marina in the Shellharbour LGA](#). Additionally, [Newcastle City Council](#) and [Canada Bay Council](#) have also enacted successful tree planting programs.

UDIA is keen to collaborate with Council, so industry concerns are addressed in the shaping of planning policy to develop the Green Grid as a viable form of green infrastructure in the Penrith City LGA.

Please contact David White, GWS and South Regional Manager on dwhite@udiansw.com.au or on 0415 914 612 should have any further enquiries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Steve Mann', with a stylized flourish at the end.

Steve Mann
Chief Executive
UDIA NSW