

31 March 2022

Dr Sarah Hill
Chief Executive Officer
Western Parkland City Authority

By email: blueprint@wPCA.sydney

Dear Sarah,

RE: Draft Blueprint for the Western Parkland City and Road Map

The Urban Development Institute of Australia, NSW (UDIA) is the peak industry body representing the leading participants in urban development in NSW. Our more than 450 member companies span all facets of the industry from developers, consultants, local government, and state agencies. UDIA advocates for the creation of Liveable, Affordable and Connected Smart Cities.

UDIA welcomes this opportunity to comment on the *Draft Blueprint for the Western Parkland City* (the Blueprint) which has been issued for public exhibition by the Western Parkland City Authority (WPCA). We offer no comment on the Western Parkland City Roadmap, which is primarily focussed on economic and investment initiatives.

We are strongly embedded in Greater Western Sydney, and our NextGen West advocacy program, which we are currently rolling-out with *Business Western Sydney* (Refer to **Attachment No.1**), targets six key policy areas including enabling infrastructure, jobs, and housing affordability. Our NextGen West program will help Greater Western Sydney, and in particular the Western Parkland City, emerge as Sydney's primary growth area over the next 20 years and place for jobs and homes and with good livability for its residents.

Under NextGen West we have formed the Western Parkland City Leadership Panel and Aerotropolis Delivery Taskforce, who's members have informed this submission. These groups include developers, planning and delivery professionals presently working in the Western Parkland City on key projects focussed on infrastructure, housing, and employment.

Delivering the Western Parkland City

The delivery of a city is a complex task that will require stakeholder commitment over an extended period to provide the homes and jobs required for over 500,000 new residents by 2041. There is also the infrastructure required including both city shaping infrastructure, such as rail lines, and critical enabling infrastructure to support growth as it occurs.

The future success of Greater Sydney's global competitiveness is tied closely to the success of the Western Parkland City to catchup on infrastructure delivery. Crucial to this success is sustained investment in the major city shaping and critical enabling infrastructure to support growth.

We agree with the Minister's foreword in the Blueprint that identifies that the Western Parkland City needs a sustained funding program of up to \$60 billion over a 15-year period. Initial funds should be spent developing business cases for major transport infrastructure (rail and roads) to improve connectivity to the Aerotropolis (Bradfield). This must also include a short-term roads package and a kick-start investment in

critical enabling infrastructure to help deliver the proposed metro rail connections to Leppington by 2031, St Marys to Tallawong and then from Bradfield to Campbelltown Macarthur and Westmead.

We are keen to see WPCA's planning vision achieved for the Western Parkland City as a "Green, Connected and Advanced" city with both national and international significance. WPCA must lead on infrastructure delivery to support housing supply and to address critical housing shortages and rising socio-economic inequality. This can only be achieved with a transport network that provides easy access to jobs at key centres in the Western Parkland City, where the cost of living can be maintained.

Importantly the planning for the Aerotropolis, as the new heart of the Western Parkland City, should provide a workable development pathway to drive initial momentum without the process complexities and potential cost negative outcomes which the industry is concerned about.

Recommendations

UDIA supports the approach adopted by WPCA and we offer the following eight recommendations:

- 1) WPCA works to achieve land use integration with the delivery of the key rail transport corridors nominated in the Blueprint by identifying and targeting growth at future stations and precincts.**
- 2) WPCA works closely with key stakeholders from the onset, and as part of a program, to transition existing land uses to station precincts based on Transit Oriented Design principles.**
- 3) The NSW Government commits to a funding program to deliver the Western Parkland City based on a range of funding sources.**
- 4) WPCA provides a road delivery plan that supports short term road access to the Aerotropolis (Bradfield) within the integrated transport plan.**
- 5) WPCA collaborates closely with industry on the planning and delivery of key infrastructure needed for the Western Parkland City.**
- 6) WPCA collaborates with Sydney Water to deliver a program for the proposed Blue Green Grid based on a "water in the west" approach.**
- 7) WPCA continues to engage closely with local councils to prioritise and coordinate all infrastructure to achieve land use planning outcomes that maximise the benefits of Government investment in the Western Parkland City.**
- 8) WPCA collaborates with the NSW Department of Planning and Environment to achieve integration between the Blueprint priorities and the planning outcomes arising from the review of the South West Growth Area Structure Plan.**

Commentary

- 1. WPCA works to achieve land use integration with the delivery of the key rail transport corridors nominated in the Blueprint by targeting growth at future stations and precincts.**

Historically, NSW has been poor at integrating transport and land use. As a consequence, we have poor access to public transport and low-density housing around major transport hubs. We have continued to make basic mistakes in recent decisions in Western Sydney.

For example, in our 2020 submission on the *Western Sydney Place Infrastructure Compact*, we identified nine station precincts in the Northern section of the Airport Metro now under construction that could have been provided (Refer to **Figure 1**) a further seven station precincts and locations for growth. Instead, a short-term transport led approach was adopted to the selection of only a few stations, dramatically reducing the long-term place making potential of the infrastructure.

UDIA has been working with Professor David Levinson from the University of Sydney on how jurisdictions around the world are applying best practice methods to integrate transport and urban planning. Professor

Levinson work has identified that cities must be built around access to link transport nodes to development around them.

To deliver on the vision for the Western Parklands City, we need to avoid repeating the mistakes of the past. Hence, we support the delivery of the four proposed Airport Metro rail lines, as presented in the Blueprint in priority order, that will link the Aerotropolis (Bradfield CBD) to Greater Western Sydney:

1. Bradfield City Centre to Leppington and Glenfield (Priority C2);
2. North West extension from St Marys to Tallawong (Priority C4);
3. South from Bradfield to Campbelltown-Macarthur (Priority C4); and
4. North east from Bradfield to Westmead (Priority C4).

This key city shaping infrastructure will establish the spatial framework from which to provide the jobs and housing needed for a future population which would be concentrated at key station precincts within the proposed corridors.

To achieve this and from the onset, WPCA must develop an integrated land use planning approach with the delivery of the transport corridors which is based on 30-Minute City and Transit Oriented Design (TOD) principles. An integrated corridor rather than an individual precinct focused approach will allow TOD based planning of key station precincts in each transport corridor. To achieve this, and in accordance with Priority C5, WPCA should identify the location of stations along the key transport corridors based on place making and accessibility principles.

An example of a good TOD development is Edmondson Park (**Figure 2**) where a town centre near an existing station contains a mix of residential and commercial development at higher densities supported by open space and educational uses. Edmondson Park provides evidence that a more diverse product range of housing is not only possible but also marketable now.

A combination of maximising the number of stations and targeting growth around them, will help provide up to 180,000 homes needed for the future Western Parkland City population who will also live in the South West and North Growth Areas and at the Aerotropolis (Bradfield CBD and the Northern Gateway Precinct). It will also lead to time-travel savings between jobs and homes, a key issue that affects the livability of Greater Western Sydney residents.

Figure 1 – UDIA proposed Metro Rail with stations

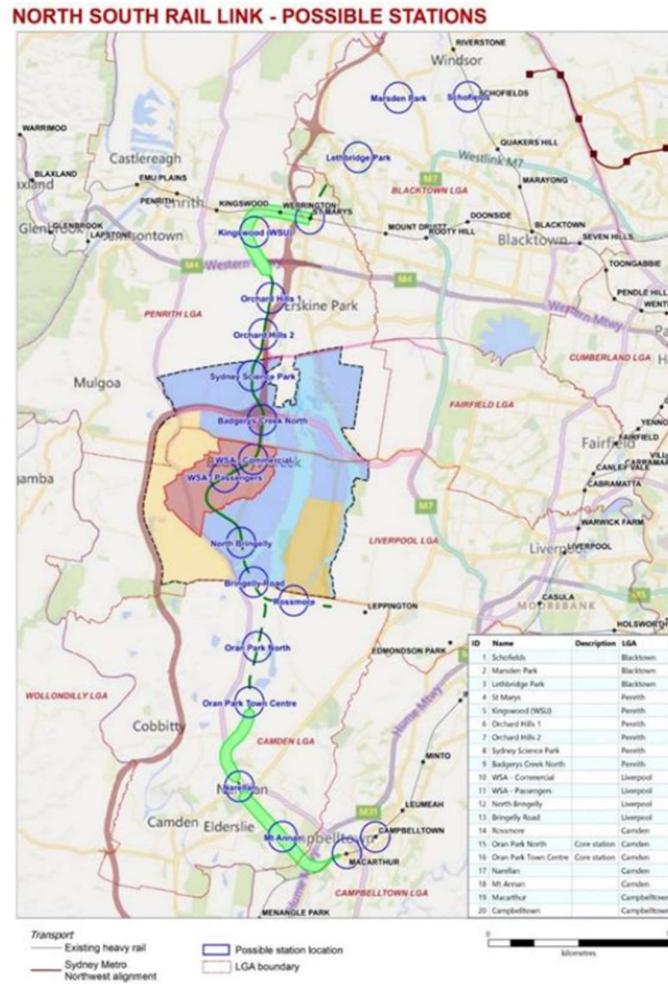


Figure 2 – Edmondson Park Town Centre



2. WPCA works closely with key stakeholders from the onset, and as part of a program, to transition existing land uses to station precincts based on Transit Oriented Design principles.

Inevitably, there will be a gap, potentially for many years, between when Government (typically Transport for NSW) has identified a station location and when funding to deliver the line and station is approved. Additionally, even if the station and line is delivered, we know that development does not automatically

occur. For example, the current approach to the Leppington Strategic Centre has not succeeded, with no development occurring.

We need to plan to transition the land uses around future stations from identification through to final realisation. Transitioning future station precincts (Refer to **Figure 1**) in the key transport corridors will be a complex task that will involve many stakeholders, including state and local government agencies and key landowners and developers. Working closely with key stakeholders from the onset, to identify key station precincts and on planning provisions that achieve the early and staged redevelopment of land, will provide the best opportunity for these locations to become growth centres.

The work should occur as part of a program over the medium term (5-10 years), to allow a transitioning of existing development to a more intense urban form at each station.

3. The NSW Government commits to a funding program to deliver the Western Parkland City based on a range of funding sources.

UDIA acknowledges the massive funding requirements for building a city of the future, currently estimated at \$60 billion over a 15-year timeframe and beyond current funding commitments. This is critical to the success of the Western Parkland City and to achieve the vision identified in the Blueprint. Therefore, we encourage WPCA to develop a long-term funding program in conjunction with the NSW Government, which could include the following sources:

- General revenue;
- Regional Infrastructure Contribution funding as identified in the Infrastructure Contributions Reform Package, recognising that this funding type will replace the Draft Aerotropolis Special Infrastructure Contribution (SIC) and the Growth Centre SICs;
- Funding grants such as WestInvest;
- 50/50 financing of local infrastructure with councils based on a payback promise to the State;
- Tax increment financing; and
- Developer delivery of key infrastructure subject to Voluntary Planning Agreements;

The funding program would also integrate with local council infrastructure funding, which will typically come from local developer contributions and grant programs such as WestInvest. This process could be managed through an Urban Development Program, lead by WPCA, that brings key stakeholders together to coordinate and prioritise the integrated delivery of infrastructure to support growth.

The funding should also be delivered as part of a rolling program to provide greater certainty to infrastructure providers, the wider community, and to the development industry that infrastructure will be committed to over the long-term.

4. WPCA provides a road delivery plan that supports short term road access to the Aerotropolis (Bradfield) within the integrated transport plan.

The first movers at the Aerotropolis will be large format development (mostly sheds) to accommodate logistics and supply chain requirements arising from the huge growth in demand from Greater Sydney and the new airport. This industry type requires good regional and local road access, not currently fully provided at the Aerotropolis. UDIA supports a connected Aerotropolis that includes a package of “second wave” road infrastructure in the initial employment precincts.

The Federal and State funded initial road infrastructure package that included The Northern Road were beneficial to future growth but now the next wave of road infrastructure is required, especially up to the

opening of the Airport in 2026 and to service employment uses in the Aerotropolis. Key road upgrades should include Fifteenth Avenue and Badgerys Creek Road.

In accordance with Priority C7, WPCA should develop an integrated road delivery plan that targets the Airport's opening in 2026 and beyond to encourage investment in the short term before other transport modes (metro and rapid bus) are delivered.

5. WPCA collaborates closely with industry on the planning and delivery of key infrastructure needed for the Western Parkland City.

UDIA considers that a lack of industry engagement in the past has resulted in poor city shaping outcomes to maximise growth potential in the Western Parkland City.

The business case development for the Western Sydney Airport Metro occurred with little industry involvement, resulting in a failure to maximise the potential for station precincts as locations for future growth. Instead, only two stations, at 5-kilometre intervals, will be built instead of a possible five station precincts (Refer to **Figure 1**). Noting that the Singapore and Hong Kong Metros typically have stations at an average 1.0 km intervals.

With the development of the Bradfield city, WPCA should aim to achieve what has occurred with the current Sydney Rail network that connects to the Sydney CBD, which contains multiple lines and stations, at average 2.0 km maximum intervals (Refer to **Figure 3**).

Figure 3 – Stations and lines linking the Sydney CBD



Because it will be largely delivered by the private sector, industry engagement and involvement is critical to the success of the Western Parkland City. With the Blueprint, we have an opportunity to combine the shared knowledge of city delivery from both government and private sector stakeholders through active participation in the priority and delivery of infrastructure to support growth. This "partnership approach" has proven to be successful in the development of the Edmondson Park / Green Square growth precincts and can only help WPCA achieve their goals.

6. WPCA collaborates with Sydney Water to deliver a program for the proposed Blue Green Grid based on a "water in the west" approach.

Sydney Water is now the Water Management Authority (WMA) for the South Creek and broader Aerotropolis Catchment. This is a significant step to deliver a Green City and the Blue Green Grid and Green priorities.

The Blue Green Grid vision, while meritorious and incredibly important, will be extremely difficult to achieve and require significant maintenance (costs and time) once operational, an issue which councils have raised as a significant concern, especially once environmental lands are transferred.

The Blue Green Grid presently remains underfunded, and its immediate benefits remain unclear. The delivery of the Blue Green Grid at the Aerotropolis has caused considerable stakeholder concern, due to 42% of the land zoned environmental reverting to its original land zoning prior to the gazettal of the *State Environmental Planning Policy (Precincts—Western Parkland City) 2021*.

In accordance with Priority G2, UDIA advocates for a “water in the west” approach which is underpinned by a flowing South Creek, green places, and riverside development. This requires an integrated water cycle management that allows for innovation to drive water reuse outcomes for residential, business, irrigation, and environmental flows.

Practical site solutions on how water quality targets will be achieved is particularly important to minimise development costs with provision of suitable water detention measures at sites in the Aerotropolis.

Whilst the determination of Sydney Water as the WMA is a positive step, WPCA must now work on a delivery program to achieve the Blue Green Grid and “Green City” priorities in the Blueprint, which has strong stakeholder support. This will increase development industry confidence to embrace the key Blueprint principles and priorities and work with government on possible solutions.

7. WPCA continues to engage closely with local councils to prioritise and coordinate all infrastructure and achieve land use planning outcomes that maximise the benefits of Government investment in the Western Parkland City.

In accordance with the Western Parkland City Deal and in reference to previous comments made in this submission, local councils will continue to be a very important stakeholder. Councils will be responsible for most development approvals, the management of public land and the lead place creator and manager once land is developed and infrastructure is delivered.

It is critical that WPCA continues to work with the local councils as precincts are developed to integrate both local and state infrastructure delivery funded under distinct contribution plans and grant schemes. With the final package of Infrastructure Contributions reform yet to be agreed and a competitive nomination process established for the WestInvest program, funding sources are far from certain.

By working closely with local councils on a prioritised master program that sets out delivery timeframes for both local and state infrastructure, better planning outcomes, more efficient delivery of infrastructure, shorter timeframes and higher returns on investment can be achieved. This is especially important where council boundaries exist along major roads such as Elizabeth Drive.

8. WPCA collaborates with the NSW Department of Planning and Environment to achieve integration between the Blueprint priorities and the planning outcomes arising from the review into the South West Growth Area Structure Plan

DPE is currently reviewing the SWGA Structure Plan, originally drafted in 2006. This key spatial plan, which covers close to 25% of the total land area of the Western Parkland City, needs to be aligned with the Blueprint delivery program.

Our 2021 submission to DPE on the SWGA Structure Plan provides our key recommendations on how the Growth Area should be developed (Refer to **Attachment No.2**).

Conclusion

UDIA supports the Draft Blueprint for the Western Parkland City to deliver the Western Parkland City as a Green, Connected and Advanced City that will accommodate a further 500,000 people and 200,000 jobs.

The Blueprint provides the opportunity to target the delivery of priority infrastructure to support the Western Parkland City but also a way to develop an integrated land use outcome that targets growth at key station precincts, like what has occurred at Edmondson Park.

A sustained funding program and commitment, by this and future governments is crucial to achieve the planning vision for the Western Parkland City.

UDIA supports the close engagement of industry to help achieve the planning vision and deliver on the infrastructure and growth priorities identified in the Blueprint and South West Growth Area Structure Plan.

Thank you again for the opportunity to make a submission on the Draft Blueprint for the Western Parkland City. UDIA looks forward to continuing to work with Western Parkland City Authority and we seek further engagement to discuss our recommendations further.

Should you have any further questions or to arrange a meeting, please contact David White, GWS and South Regional Manager on 0415 914 612 or dwhite@udiansw.com.au

Kind Regards,



Steve Mann
Chief Executive
UDIA NSW

Attachments

Attachment No.1 – NextGen West Program

Attachment No.2 – UDIA NSW submission on the review of the South West Growth Area Structure Plan, 2021