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Submission	-	North Penrith Urban Area
	-	Application by Landcom

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Executive Summary

Every State Government metropolitan planning statement in the last 45 years has suggested that Penrith should be a Regional City, or similar wording. Every report to both State Government and Penrith Council has emphasised the need to develop employment opportunities in the Penrith area. The Metropolitan Regional Strategy highlights the former North Penrith Army Land as a strategy metropolitan site in the development of Penrith as a Regional Centre.

State Government has linked the construction of a multi-storey car park to the sale of the land. This has caused some organisations to 'take their eye off the ball'. Putting this structure at the 'front end' of the development phase has skewed the financial analysis towards a short term development period - i.e. a residential response. The argument is flawed.

At present, empty train carriages come to Penrith every morning. The development of a Business Park in Penrith may take 30 years to realise, but it is a better solution in terms of life-style and environment. The cost to the State of commuting 40,000 people out of Penrith daily should not be ignored.

Outside the political sphere, no-one doubts the need for this land to be developed as a Business Park and Educational Precinct.

Introduction

The discussion and argument over the fate of the former North Penrith Army Land has raged for over 20 years. Broadly speaking, there have always been two sides to the argument. On one hand, there are those who seek a rapid solution regardless of the long term cost. In this group we have regrettably seen sections of government, State and Federal, when they have sought maximum return in the minimum time from the disposal of the site. On the other hand, there is the group who seek a solution of long term benefit to both Penrith and to Sydney as a whole. In this group we see the people and businesses of Penrith, and many reports to government, at all three levels, who see the long term advantage of an employment based master plan for such a strategic site. The

longer term solution requires a longer time frame to achieve, directly conflicting with the stated purpose of the first group.

In the current proposal, the political proponents have sought unlikely allies by linking the sale of the land to Landcom, with the perceived desperate need for a multi-storey commuter car park to be built on the site. The financial details offered have been skewed to support this result.

No independent report has ever suggested that alienation to residential uses is a logical long term solution. Many in public life have tried to create a short term solution, 'on their watch', in the hope of being able to claim a victory.

The Multi-Storey Car Park

It is logical that the sale of the land be Master Planned with provision of a multi-storey car park. There are 800 commuter parking spaces on the land at present, but closer to 1000 park in the area every day to commute to work. In addition, Penrith City Council has diverted an equal number of spaces to commuter purposes on its own development lands on the south of the Rail Station. The need for commuter parking is well documented.

All financial calculations associated with the development of the subject site, have been predicated on the development, up front, of the commuter car park. This is not a logical response. At the start of redevelopment, there are 40 hectares of vacant land available for parking. There is adequate land for 2000 parking spaces, at grade, on the land that will not be developed for 10 to 20 years under an employment based development proposal. This up front costing, of a \$20 million infrastructure element, has skewed the financial benefit calculations towards a rapid development for residential purposes. The argument lacks credibility. Immediate provision of 2000 spaces at grade followed by multi-storey parking structures, when the land is required at the last stage of development, puts the cost at the end of the development period rather than at the front. This outcome favours the employment based solution.

Employment Lands

There will be many submissions emphasising SEPP66 and the benefits to Penrith and Sydney, of using this land for development purposes. As a 40 hectare site, it is of such a size that it is, of its own, critical mass size for development of a Business Park. The associated 'large floor plate' office development, in immediate vicinity to the Rail Station, is a 'once in a generation' opportunity to position such a development right next to public transport. The environmental benefits are self evident and will be well presented in other submissions. At present, some 38,000 people leave Penrith every day to go to work. This number can only grow, putting increased pressure on a stretched public transport system, unless increased employment opportunities are developed in Penrith. Empty carriages come to Penrith in the morning to take commuters to the city. There is no public transport infrastructure cost to developing the site for employment use. Conversely, developing residential land next to the rail station places an increased cost on public infrastructure.

ABS data evidences the number of Penrith people working in higher order jobs. Most of these commute elsewhere for work. This is the section of the employment workforce most affected by the lack of a Business Park in the Penrith area.

Educational Uses

In recent years, the University of Western Sydney has relocated faculties away from the Penrith campuses due to lack of lecture theatre facilities. These include the Business Faculty, as I understand it.

A local private Secondary School has expressed a keen interest in developing a senior High School campus on any site immediately adjacent to a rail station. The success of the St Marys Senior High School is based on its proximity to the Railway Station, allowing students to access the school from all areas. This critical mass of students at the Year 11 and Year 12 level of schooling has allowed a particularly broad curriculum to be developed. As the Penrith region grows, there is a need for another such facility and it is only logical that another school community has expressed an interest in filling that need.

Business Park Time Line

The Norwest Business Park is still growing and developing 20 years after the development of the site began. Such developments consume a long time line and require long term thinking, well outside the visual span of the political cycle. Yet the employment based solution is in line with every Sydney Metropolitan strategy statement published since the 1960s, highlighting Penrith as a regional centre.

It is for the bureaucrats, at State and Local government level, to hold ground. The mass of reports proposing an employment solution for the site is ever growing. State Government policies emphasise the need for employment growth in Western Sydney, where the majority of population growth will occur, on environmental grounds and to limit the pressure on public transport.

Penrith has been spoken of as a Regional Centre in various State Government policy statements going back to the 1960s. At times, short term political decisions have been made to limit the effect of these policies, but the overall policy, as developed by Planning Departments is repeatedly valid. More recently, we have seen the role of Penrith

Courts reduced, faculties of UWS removed to Parramatta, and a range of surgical proficiencies moved from Penrith Hospital to Westmead. Over time, there is confidence that these short term decisions will be reversed and political forces will adhere to government policy and help Penrith to develop as a Regional Centre.

In recent days, we have seen complaints about traffic and public transport congestion at Westmead. This is entirely due the current State Government's move to centralise health services near Parramatta. Many of these services were available in Penrith until a few years ago. This is not to confused with expansion of Nepean Hospital, which is an expansion of 'capacity', rather than an expansion of 'capability' to a level of services once supplied to the area.

An Alternative Master Plan

The writer is not a planner, and no attempt is presented here to offer a complete alternative plan. Indeed, the Landcom and Penrith City Council have committed significant resources, over the past 18 months, to prepare the thousands of pages of documentation supporting the Landcom proposal. To suggest that a fully documented counter-proposal could be developed over the summer period during the four weeks of public exhibition is laughable. However, the following broad outline is offered.

- A 30 year time line, rather than the Landcom 10 year time line.
- The full 40 hectare site dedicated to employment uses and education precinct as a master planned Business Park.
- Business Park uses of Large Floor Plate Office Development be permitted.
- Negotiations with UWS, State Government and private school communities for the development of an education precinct with a focus on business education.
- Surplus land to be used as commuter car park with a minimum of 2000 spaces at grade. As the development progresses, multi-storey parking be developed to provide 2000 spaces as the demand for land continues.
- Potential expansion of the Business Park zoning to include industrial lands to the north of Coreen Avenue.
- Limited high quality, high density, residential development on the outer radius of the site. This could offset 'affordable housing' development on a more appropriate site.
- UWS residential demand to be satisfied on existing campuses at Kingswood and Werrington.

- Proper integration of the road structure for the site with the road reserve linking Coombs Avenue and Andrews Road. This is not part of the existing master plan.

Penrith City Council Planning Report

On 31 January 2011, the Planning Department of Penrith City Council delivered a report to a meeting of Council. The following quotes from that report evidence the reservations held within Council, regardless of any public support Council may have expressed for the Landcom proposal.

- The site provides a unique opportunity to strengthen the role of Penrith as a Regional City.
- Council's objectives for the site were developed through the preparation and adoption of a local environmental plan and development control plan in 2000. Those strategic planning documents seek to promote a mixed use response on the site comprising high density housing with employment opportunities for job intensive uses such as education, research and technology.
- Our preliminary analysis suggests that higher rise residential development would be best pursued as mixed use residential development in or surrounding the village centre. Landcom have indicated, and recent analysis for the Penrith Business Alliance confirms that currently there is a limited market for higher rise (6+ storeys) mixed use residential development in or adjacent to the Penrith CBD. Under these circumstances, it is necessary to demonstrate the amenity and attractiveness of higher rise living adjacent to the city centre and the bus/rail interchange, if the NSW Government's strategic objectives for the site and Penrith's role as a Regional City are to be realised.
- Council's Sustainability Blueprint for Urban Release Areas seeks to ensure that a quantum of new jobs (both on-site and off-site) is created with each new release area to match the number of incoming resident workforce participants. That quantum is generally considered to be at least 1 job per new dwelling. At this rate, the proposal with up to 1,000 new dwellings would require up to 1,000 new jobs. In this sense the proposal, with up to 1,450 jobs, exceeds Council's normal expectation. However, this site is not a standard residential release area and is of strategic significance to the development of Penrith as the Regional City for North West Sydney. Its location adjacent to the Penrith CBD and the bus/rail interchange requires a higher employment generation than that expected of other urban release areas located in the City's suburbs. This has been recognised by the NSW Government in the Metropolitan Plan, which notes the site is "*well suited to accommodate employment growth*" and seeks to concentrate residential densities and employment opportunities around existing transit nodes, in and adjacent to centres.

Council staff have sought to highlight the fact that this is a strategic site that needs an employment based solution. The provision of a few jobs to support a residential redevelopment is inadequate. The market for high rise residential in the area is particularly immature, and Council staff clearly doubt the likelihood of success of the Landcom proposal.

Conclusion

A number of organisations in the Penrith area have been forced to support the current proposal because State Government has linked the sale with the provision of a multistorey car park, which is not required in the immediate future. There are some organisations which are so desperate for development in Penrith that they will support any project without considering the long term affects the project may have on Penrith's future. The best solution for Penrith is a long term, employment based solution.