

31 March 2021

Dr Sarah Hill  
CEO  
Western Parkland City Authority  
Level 2, 10 Valentine Avenue  
Parramatta NSW 2150

Online submission

## **Draft Western Parkland City Blueprint and Draft Economic Development Roadmap – Phase 1**

Dear Dr Hill

I write in relation to the “Draft Western Parkland City Blueprint” and “Draft Economic Development Roadmap – Phase 1,” prepared by the Western Parkland City Authority (WPCA), which has been made available for industry comment until 31<sup>st</sup> March 2022.

This document represents Urban Taskforce Australia’s (The Urban Taskforce) submission to both exhibited documents – the Draft Western Parkland City Blueprint (Draft Blueprint) and Draft Economic Development Roadmap – Phase 1 (Draft Roadmap).

The Urban Taskforce welcomes the exhibition of both documents as they have potential to increase certainty amongst investors and developers. We also support the WPCA in its role as a place-based enabler and co-ordinator of growth in this region.

However, we note that there are a number of issues and opportunities for further development of the Draft Blueprint and Draft Roadmap. Our recommendations are outlined in this submission.

### **Not enough focus on housing**

Neither the Draft Blueprint nor the Draft Roadmap address the issue of housing and residential development in the Western Parkland City.

The Urban Taskforce notes that the WPCA has a stated “jobs-led approach” of developing its strategic documents as opposed to development guided by housing growth. While we respect WPCA’s decision on selecting job growth to be the leading principle, we are surprised that residential development is almost completely excluded from the documents. In fact, with unemployment fast dropping to below 4% while housing prices rocket dangerously, housing supply should be the top priority for WPCA.

The Blueprint references the housing target of 184,500 by 2036 for the Western Parkland City, as set in the Greater Sydney Region Plan. But that’s it. There is no discussion in the Draft Blueprint and Roadmap regarding how WPCA will help local councils achieve these goals.

The only time housing is considered is to acknowledge the need for diversity of housing options and social and affordable housing.

The average annual housing supply of 9,250 houses needed to meet the targets in the Regional Plan cannot be presumed to simply follow jobs growth. A focussed approach to housing supply needs to be adopted and has been the missing ingredient from Government policy in recent years.

Housing development cannot be simply left to local councils to secure through the implementation of the Housing Strategies.

However, ensuring housing supply is too important to be left out of the WPCA's strategic thinking.

The challenge to supply 184,500 new houses by 2036 requires greater consideration in all strategic plans for the Western Parkland City. The current numbers and projections raise significant concerns about the prospects of the region to achieve, let alone exceed the very modest targets. Specifically, Department of Planning projections for the next five years show most Western Sydney councils are expected to fail to meet the home building targets. If housing is not prioritised – through planning and infrastructure delivery – the same councils will continue to fall short of their targets beyond 2026.

Once properly considered in the Draft Blueprint and Draft Roadmap, the residential development in the region will better inform the other sections of the WPCA's documents. For example, the Blueprint will have a clearer vision about the demand for the local transport network and other enabling infrastructure (e.g. water, sewage), as well as the timing of those infrastructure projects.

It is essential that housing development is included as one of the highest priorities and appropriate goals and objectives should be drafted to enable housing development. Throughout the drafting process, WPCA should consult with industry. Often planners in Western Sydney develop strategies and rezone entire neighbourhoods without talking to developers, which leads to underdevelopment and missed opportunities. Those mistakes should not be repeated.

**Recommendation 1: The Urban Taskforce recommends that housing development is added as one of the “highest priorities” in the Draft Blueprint and appropriate strategic objectives related to this new priority are added.**

**Recommendation 2: The Urban Taskforce recommends that WPCA consults with the development industry on housing development in the Western Parkland City in order to ensure that the vision is based the current realities facing the industry, emerging trends and future market forces.**

**State agencies and service providers need to provide certainty on the delivery of services and infrastructure**

Urban Taskforce members express significant concerns about the lack of clarity about leadership and coordination in the Western Parkland City. The property development sector and the business community often coordinate with the WPCA, the State government and local councils, but it is not

evident that there is a strong coordination between all levels of government and that they are aligned in their visions, strategic and operational plans.

It is critical that WPCA plays a leading role to coordinate with State agencies and service providers to secure the necessary support for its vision. Both the Blueprint and the Economic Development Roadmap declare objectives, for various delivery horizons (immediate, short, medium term). However, it is unclear whether WPCA have obtained guarantees from other government agencies, and service providers that are essential for the development of this region, that they are also working at the same pace and towards the same objectives.

If the guarantees for services and infrastructure delivery are not in place, the Blueprint risks becoming yet another glossy government document which will not achieve its objectives and have limited impact on the ground.

By way of example, in November 2021, the NSW Government announced a commercial industry hub in Kemps Creek. However, if and when those 17,000 new jobs in the new commercial industry hub will be realised depends on the speed with which government agencies deliver the required infrastructure. The upgrade of Elizabeth Drive, which is critical to the Kemps Creek precinct will not be commenced or completed for years. TfNSW do not anticipate completing even a “concept road design” until mid-2022. That will then go through a round of public exhibition and community consultation. Similarly, Sydney Water has no plans to service the Kemps Creek area with the required trunk sewerage for 5 years (until at least 2026 or beyond). Development cannot occur without this infrastructure being in place and investors and developers know this. Therefore, the draft Blueprint should secure guarantees from all relevant state agencies (if it has not done so by now) and clearly outline those commitments in the documents.

In short, industry is looking to WPCA to clearly identify:

- What infrastructure is needed (the “what”)
- What employment land or new housing will be able to be developed when the infrastructure is delivered (the “why”).
- When it is scheduled to be delivered and by whom (the “when”)
- How much money this will cost (and who is paying for it) (the “how much”)

This should be updated every year (recognising the reality that things change) but the imperative must be, as far as possible, stick to the plan.

It should be noted that some of the priorities in the draft Blueprint relate to ongoing initiatives, which may be in the final stages of development. For those initiatives where plans are in already place, more certainty is required around the exact timing of delivery. For example, *G3 Priority* commits to “Deliver the Cumberland Plain Conservation Plan, including actions to protect koalas.” Currently, there is no clear timeline for the finalisation of the Cumberland Plain Conservation Plan. Many Urban Taskforce members are eager to learn of the exact date this plan would be finalised. The draft Blueprint and the Economic Development Map would benefit from the inclusion of this type of detail, if the document is intended to increase confidence amongst investors.

**Recommendation 3: The Urban Taskforce recommends that WPCA consults with relevant State agencies and local councils to ensure that their strategic planning is aligned to the WPCA's vision and updates the draft Blueprint and the Economic Development Roadmap accordingly (i.e. add additional detail about the commitment to deliver certain infrastructure/services). In cases where such guarantees cannot be secured, due to a lack of commitment, regulatory and legislative gaps, or financial uncertainty, the Blueprint and the Roadmap should be redrafted with a view not to promise a vision which may not be delivered.**

**Recommendation 4: The Urban Taskforce recommends that the draft Blueprint should clearly outline what infrastructure is needed, when it is scheduled to be delivered, by whom and at what cost, and what employment land or new housing will be able to be developed when the infrastructure is delivered.**

**Recommendation 5: The Urban Taskforce recommends that the draft Blueprint and the Economic Development Roadmap should include direct references to all other strategic documents on which both of these documents rely on. Where possible, specific dates for finalisation of external documents and their implementation should be included.**

The Urban Taskforce welcomes the opportunity to provide comments on the draft Blueprint and the Draft Roadmap. We strongly support the future growth of the Western Parkland City and will continue to consult with the WPCA.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending to the right.

**Tom Forrest**  
Chief Executive Officer