

17 July 2026

Ms. Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure,
Locked Bag 5022,
Parramatta NSW 2124

Attn.: Chris Eldred

Dear Chris,

**Re: Submission to HDA Housing State Significant Development SSD-84430209 at
156-166 Rickard Road, Leppington**

I refer to the State Significant Development (**SSD**) SSD-84430209 for the site located at 156-166 Rickard Road, Leppington. This submission is made on behalf of the owners, Leppington24 Pty Ltd atf Leppington24 Unit Trust, of the adjoining property to the north of the subject site at 176 Rickard Road, Leppington.

While we encourage that Rickard 88 Development Pty Ltd (**Rickard 88 Development**) develop their site, we are disappointed in the proposal's urban design response to the site and to the Leppington Town Centre.

The Leppington Town Centre, located within 10 kilometres of the new Western Sydney Airport (**WSA**) and within 7 kilometres of the new Bradfield City 'Aerotropolis', is identified as a Strategic Centre under the NSW State Government's *Greater Sydney Region Plan - A Metropolis of Three Cities* (2018). The Leppington Town Centre benefits from an existing train station and railway line that directly connects Leppington to Circular Quay. Given the emerging and anticipated growth in and around Leppington, Leppington is most likely going to form part of the future western Sydney 'Global Economic Corridor' in support of the new WSA and Bradfield City. Hence, where a large portion of the future western Sydney economy and a large portion of housing will be concentrated.

Leppington Town Centre offers a 'blank canvas' and a once in lifetime opportunity to deliver a new City in the Greater Sydney Metropolitan Area that demands a high level of design excellence and greater thinking beyond the 'business as usual' property development model in creating a new City.

Notwithstanding this, we are of the view that with amendments to the proposal, the proposal could eventually be in a form that could get closer to achieving design excellence.

Some of the key design amendments that we recommend that Rickard 88 Development should make to the proposal include:

1. Introduce a large open space park to the north-eastern corner of the site;
2. Relocate the pilotis building with the pickle ball courts in the undercroft to front the new north-south 25 metre local road;
3. Relocate the serviced apartments building within the site;
4. Amend the design of the internal road to create better defined urban blocks;
5. Introduce a new north-south one direction shared way from the internal road to the new road to the southern side of the site;
6. Introduce new open space in the former location of the pilotis building and pickle ball courts, as well as to part of the previous internal road location;
7. Adjust position of buildings;
8. Modulate and redistribute height of buildings across the site, so that the buildings cascade down in scale from Rickard Road to the new 25 metre local road; and
9. Redistribute the floor space across the site to align with the modulating scale of buildings across the site.

The justification for each of the above proposed amendments are discussed within this submission. Additionally, refer to Attachment 1 of the submission that graphically shows the proposed amendments to the proposed development.

1. Introduce a large open space park to the north-eastern corner of the site.

Rickard 88 Development originally proposed a large open space area in the north-eastern corner of the site. Refer to the Figure 1 in this submission for an extract of the original concept plan that is found in the “*Scoping Report - 156-166 Rickard Road, Leppington HDA Declared SSD*”, prepared by Urbis and dated 16 May 2025, which formed part of the request for Secretary Environmental Assessment Requirements (SEARs).

The standout parts of the original concept scheme were the grid pattern road layout and the arrangement of open space across the site.

Aside, it is highlighted that the recently finalised Indicative Layout Plan (ILP) does not include a park in the north-eastern corner of the site. The ILP includes a linear park on the western side of the new 25m local road for the length of the site. It is acknowledged that the proposed development addresses this by a series of deep soil structured landscape zones along the new 25m local road, which are segmented to allow entries to ground level apartments. This is considered to be a very good resolution of the new 25m local road streetscape.

With respect to the north-eastern corner park, it is evident that this solution would create a better interface with the park proposed on the adjoining property and that the open space would receive an excellent amount of solar access in the mid-winter.

Further, it would allow the proposal to best respond to the natural topographical direction of overland flow of water across the site.



Source: McGregor Coxall

Figure 1: Original concept for the site prepared by Woods Bagot

2. Relocate the pilotis building with the pickle ball courts in the undercroft to front the new north-south 25 metre local road

Relocating the pilotis building to front the new north-south 25m local road has a number of advantages, including:

- Better defines the street;
- Contributes to creating an urban room 'for the open space';
- Provides shade for the undercroft pickle ball courts in mid-summer in the middle of the day, while taking full advantage of the solar access in the morning;
- Allows solar access in the mid-winter to penetrate deep into the site;
- Allows for the natural topographical direction of overland flow of water across the site; and
- Allows for airflow under the building in summer that could be further combined with and enhanced by water demisting sprays to create a cool micro-climate in summer.

3. Relocate the serviced apartments building

The position of the serviced apartment building is consider to be awkward and inappropriate. While it could be argued that this type of development should be located on a main road, in this context we are of the view that the serviced apartments building is best located further into the site. The reasons for this include:

- Allows for a landmark building to be located on Rickard Road and to signpost the corner of the site and Rickard Road, especially in the skyline;
- Introduces a more interesting city skyline providing 'breathing space' between tall tower forms;
- The corner landmark tower should include ground level and possibly the first level retail/commercial uses, therefore pulling activity into the city. Hence, the serviced apartments building becomes a destination;
- The building would sit as a 'building in the park' arrangement, which would be a pleasant setting compared to the high volume traffic setting of Rickard Road; and
- The position of the building would still be visible from Rickard Road and could readily have a visible address from the new east-west road on the northern boundary of the site.

4. Amend the design of the internal road to create better defined blocks

Remove the wide angle in the internal road to create a 90-degree turn between the new north-south 25m local road and new east-west road on the northern boundary of the site. This improves the block design of the proposal and better aligns internal streets with the ILP. Technically, the design achieves right-angle T-intersections, which is a better outcome for visibility for all traffic movements, including vehicular, pedestrian and cyclists.

5. Introduce a new north-south one direction shared way from the internal road to the new road on the southern side of the site

This design recommendation contributes to achieving a partial grid block design on the site. Further, it contributes to slowing vehicular traffic movements through the site, while prioritising pedestrian movements and cyclists, while not forging an address and vehicle entry point to the centrally located building.

6. Introduce new open space in the former location of the pilotis building and pickle ball courts, and to part of the previous internal road location

The relocation of the pilotis building creates an opportunity to introduce new open space on the southern side of the proposed internal road. It is evident that the open space would receive good solar access in the mid-winter. In combination with new open space in the previous part of the location of the internal road, these series of open spaces work in unison, providing enhanced pedestrian permeability and improved opportunities for meaning useful spaces for the future community. These open spaces do not constrain the ground plane as per the current proposed development.

7. Adjust position of buildings;

This response is self evident. Through the combination of recommendations in this submission, the position of buildings, associated position of basement car parking, building entries for residents and vehicles would all need to be checked and adjusted.

8. Modulate and redistribute the height of buildings across the site, so that the buildings cascade down in scale from Rickard Road to the new 25 metre local road

The proposed development's current built form is perceived to be very bulky and monotonous in scale and rhythm, given that the majority of buildings are generally all the same height. This is further exacerbated some buildings, vertically coming to the ground on all faces in one plane, while others have colonnades at the ground levels, however there are no buildings that have a well defined podium design.

Firstly, the recommendations in this submission contribute to creating a better ground plane.

Secondly, it is recommended that podiums for a height of four to six storeys be introduced to most of the buildings in order to give the impression of a more human scale building design at the streetscape. This would also assist with managing pedestrian wind impacts, by way of reducing wind movements down the face of a building to the ground.

Thirdly and most importantly, in combination with the first two points above, modulating the scale of the built form across the site would vastly improve the profile of the city skyline, allow taller buildings to take advantage of regional views across the city and manage overshadowing impacts on adjoining properties to the south of the subject site.

9. Redistribute the floor space across the site to align with the modulating scale of buildings across the site.

The consequence of the previous 'point 8' above, is that the floor space across the site would be redistributed. The combination of the modulating height of buildings and redistribution of floor space, especially with more floor space being located towards Rickard Road, is considered to be an appropriate and suitable design solution. We are of the view that the proposed development's density should be more concentrated towards Rickard Road.

Summary

The recommended amendments to the proposed development in this submission have been made in consideration whether DPHI and the Minister for Planning have a mind to grant development consent to the proposal.

We are of the view that the current proposal would exhibit a far better urban design resolution on the subject site and for the Leppington Town Centre, if the recommendations in this submission are implemented.

Notwithstanding the above, it is noted that we do not object to the proposed floor space ratio (**FSR**) for the proposed development. However, the ultimate FSR achieved by the development would need to be driven by improving the urban design outcomes on the site.

In order to assist Rickard 88 Development and DPHI, we make ourselves available for a meeting with both parties, to discuss the recommendations in this submission, and to address any interface design considerations between our sites.

Yours sincerely,

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

Michael Gheorghiu

B.Eng (Civil & Bldg.), MURP, MUDD

ATTACHMENT 1: RECOMMENDED AMENDMENTS TO THE PROPOSED DEVELOPMENT

