Landcom Comments – draft Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan – Stage 1: Initial Precincts

1. Planning Approach

Landcom commends DPE on the proposed planning approach with the draft LUIIP being the first overarching strategy of a five stage process. This process will allow a broad range of engagement and allow for greater detail as the process progresses.

Formation of the Western City and Aerotropolis Authority demonstrates the importance of this area as a once in a generation opportunity to deliver benefits for Greater Sydney, NSW and Australia.

The Western Sydney Planning Partnership is an excellent example of collaboration in order to achieve mutual outcomes. This approach is strongly supported. It is anticipated incompatible situations will arise and continued strong support from DPE is required to ensure the partnership remains fully effective.

The body of work associated with the LUIIP leading up to plan making and then implementation through application assessment will be extensive, large-scale and time driven; and will increase in the coming years. Collaborative solutions to ensure sufficient resources are available is essential to enable timely assessment and decision making. Potentially the Western Sydney Partnership to be used to share resources or take on delegated powers in order to share the load and responsibility; keeping in mind most of these Councils are currently under-resourced and dealing with growth area level development.

The draft LUIIP provides an outline for streamlining planning through the SEPP, expanded complying development and other measures. Clarity on processes and mechanisms will be essential to ensure the effective and timely assessment of applications.

Landcom support the streamlined three land use zones – urban development, infrastructure and environment. The urban development zone will provide the necessary flexibility to ensure intended outcomes are achieved, specifically in the initial three precincts.

2. Urban Form

Landcom supports the proposed urban form focussing on employment generating activities and residential at a density typical of inner city areas rather than a suburban model.

The commercial mixed use core, within a fine scale walkable streetscape and supported by active frontages will suit the expected workforce and potential workforce/residents who prefer inner city lifestyles.

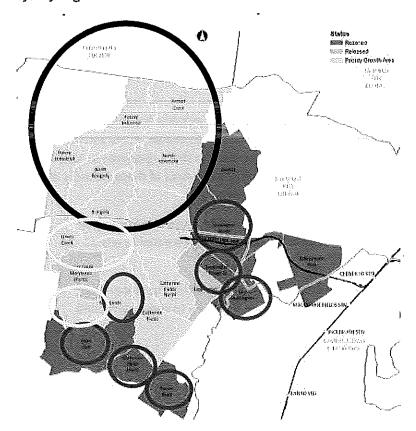
The workforce and resident base will expect development that is well designed for working and living that has good accessibility, high amenity and is close to play. Landcom welcomes the opportunity to demonstrate, within the Aerotropolis Core, development that is directed the diverse mix of workers and residents expected – from the tech savvy systems engineer to the airport baggage handler seeking affordable housing close to their workplace.

3. Interaction with other SEPPs

The proposed Western Sydney Aerotropolis boundary modifies the Western Sydney Priority Growth Area Boundary and overlaps with defined precincts in the Sydney Regional Growth Centres SEPP, specifically North Rossmore, Rossmore, Kemps Creek, Lowes Creek, Maryland, Bringelly, North Bringelly and Future Industry.

The LUIIP infers a new SEPP specifically for the Western Sydney Aerotropolis. It is not clearly stated whether this will replace or be incorporated into the Sydney Regional Growth Centre SEPP. Clarification is required.

Below - Precincts in the South West Priority Growth Area and Western Sydney Priority Growth Area included in the Sydney Regional Growth Centres SEPP.



Notes –
Areas in dark green are released and rezoned.

Areas in light grey form part of the Western Sydney Priority Growth Area and are identified in the Sydney Regional Growth Centres SEPP, some of which are now included in the Western Sydney Aerotropolis LUIIP area.

Areas circled in red had minor amendments made in August 2016.

Areas in light green have VPA agreements and in November 2017 a VPA was signed between DPE and Greenfields Development Corporation over the southern section of Maryland, directly north of Oran Park, named Pondicherry (blue circle).

DPE is progressing and Land Use and Infrastructure Plan on an area named - South Creek West (yellow circles).

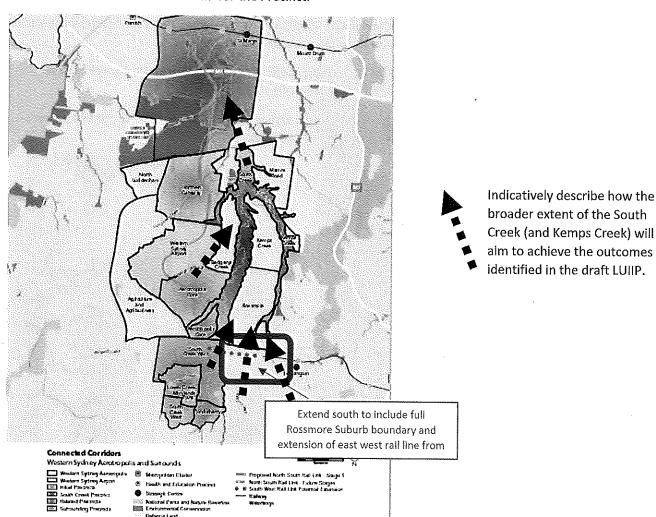
The Dark Grey circle represents the area covered by the Western Sydney Aerotropolis LUIIP.

4. Western Sydney Aerotropolis Boundaries and Precinct Boundaries

The proposed Western Sydney Aerotropolis LUIIP area boundary is supported.

Three refinements are suggested:

- 1. Rossmore Precinct. It is suggested this could be extend south to -
 - align to the existing suburb boundary,
 - allow for rail corridor protection,
 - provide a direct connection for the South Creek Precinct into the South Creek West, Lowes Creek and Maryland and Pondicherry release areas, thereby ensuring integration and continuation of the South Creek objectives.
- 2. Indicatively identify how the South Creek Corridor will be addressed in the areas to the north of the Western Sydney Aerotropolis referred to as Related Precincts in the draft LUIIP.
- 3. Provide a recommended approach for the section of South Creek that boarders the Western Sydney Airport area. The Creek forms the border between the Airport site and the Badgerys Creek and Aerotropolis Core Precincts which are predominantly identified as business and industry activities. Continuing the emphasis of the South Creek Precinct through these areas will be essential to achieving outcomes identified in the LUIIP for the Precinct.



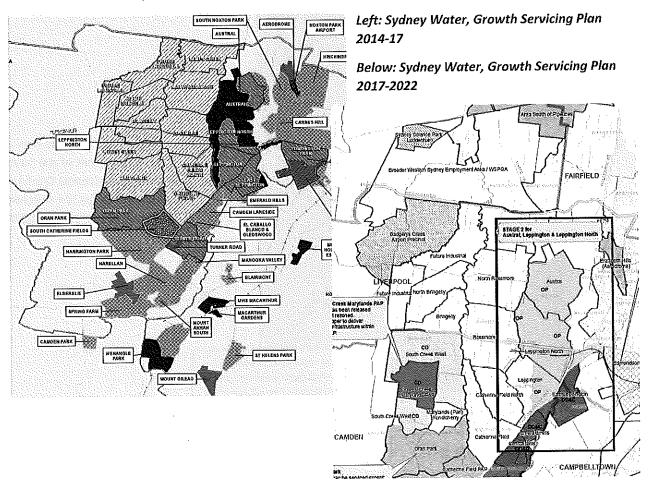
5. Infrastructure

Landcom support the approach to integrated land use and transport infrastructure. These are well described throughout the Plan and in associated documents such as Future Transport 2056 and the Western Sydney Corridor Plan. Likewise, Section 6 – Funding, Coordination and Delivery of Infrastructure outlines approaches for education, health and cultural facilities through partnering with relevant agencies.

In relation to utilities, Section 6.2 provides very high level information, yet barriers exist and should be further explored/clarified in the final LUIIP.

For example, Sydney Water's Growth Servicing Plan was critical to the provision of drinking water and waste water services when determining the release of areas in the South West and Western Sydney Priority Growth Areas. The Sydney Water Growth Servicing Plan 2014-19 or the 2017-22 do not identify the ability to service the precincts within the Western Sydney Aerotropolis LUIIP boundary. While it is anticipated further work will inform a modified Growth Servicing Plan to service these areas, this should be a priority and aligned to the Land Use and Infrastructure Implementation Plan. The first area/site identified in the LUIIP for activation is the 114ha Commonwealth Government site in the Aerotropolis Core Precinct yet it would fall into the processes outlined in the LUIIP as 'out of sequence development' due to a lack of identified water infrastructure. Early consideration of how this site will be serviced is essential to success of the broader area.

It is suggested the utilities comments mentioned in the Northern Gateway Implementation Strategy are also included in the Aerotropolis Core and South Creek Implementation Strategies.



6. Infrastructure Contributions

It is essential that all contributions, levies and other value sharing mechanisms are prepared early in the process to ensure good notice to market. In addition, they should be -

- supported by a solid methodology in order to provide transparent information to industry,
- feasible for all land use types rather than focussing on residential as typified by SIC plans for other locations, especially as the Aerotropolis has an employment generating focus.
- tested to ensure they facilitate, rather than detract, from proposed outcomes.

7. South Creek Precinct

The approach to delineating South Creek and its tributaries is supported. Some additional matters regarding the creek corridor were discussed previously in Section 3 - Precinct Boundaries.

The outcomes proposed in the LUIIP will result in positive, permanent and long lasting benefits for the Western City and its future communities. The size of the Precinct, and if extended throughout the entire creek network to the north and south, has the potential to maximise benefits for the natural environment, biodiversity, open space, recreation and functional water management. We welcome the approach and look forward to reviewing further detail as it become available. In preparing the next stages of Precinct Planning clarification should be provided on ownership, costs to purchase and maintenance responsibilities. It is expected the South Creek Precinct will have multiple owners and various purposes, but is also largely in private ownership. They will need certainty existing uses are protected and where land is required for public purpose they will be duly compensated.

From an industry perspective, using the Probable Maximum Flood boundary as the extent of the Precinct will have negative implications for landowners, specifically as the draft LUIIP contains little information on how complementary services such as stormwater management will be addressed. It is anticipated, and clarity is sought, that the LUIIP intends to manage these services within the PMF area and wholly within the South Creek Precinct.

8. ANEF 25 Restrictions

Landcom notes the intent to protect noise sensitive receptors from airport and aircraft noise. The draft LUIIP is quite clear that residential is excluded, however, guidance on other uses and continuation of existing uses are not affected by this decision. We note the ANEF 20 and 25 extend outside the LUIIP boundary and may require amendment to other planning instruments if it is intended to fully protect the needs of a 24 hour airport facility.

9. Partnerships with Large and Small Landholders

Success of the vision for the Western Sydney Aerotropolis will rely on strong collaboration and partnerships with both large and small landholders.

Some of the essential infrastructure, road and rail corridors, outcomes for the South Creek Precinct and other expectations of the draft LUIIP will rely on early and collaborative discussions with landowners.

It is suggested that resources are dedicated to building transparent relationships with landowners, specifically those who are the key to particular outcomes – for example Fifteenth Avenue and the North South Metro route.

10. Embed Commercial Consideration into the LUIIP

One significant factor effecting landowners will be land tax and holding costs implications once the three Precincts are rezoned. These will impact on a multitude of decisions about when owners can or are willing to participate in delivery of expected outcomes. While activation of the three initial Precincts is supported the final LUIIP and remaining phases of the planning process should be cognisant of the commercial/financial impact on landowners.

11. Landcom as a Collaborative Partner in Western Sydney

Landcom are a willing participant in the planning and delivery of the Western Sydney and have been for some 35 years. We have a strong background in the area and equally strong relationships with local councils, landowners and development partners – private, government and institutes.

As outlined in our Strategic Directions and aligned to our statutory, commercial and social, objects, we would welcome assisting DPE to ensure the outcomes sought by the draft LUIIP progress in a positive and collaborative way.

Landcom are available to assist DPE -

- 1. Provide detail of commercial considerations that should be considered in the final LUIIP and as the planning pathway continues.
- 2. Assist in undertaken feasibility assessment to test land use, take up and built form principles as they are developed.
- 3. Assist in delivery of Affordable Housing and housing diversity across the Western Sydney Aerotropolis in line with Landcom policy.
- 4. Assist in relation to outcomes associated with job expectations and workspace ratios across the Western Sydney Aerotropolis.
- 5. Assist the Western City and Aerotropolis Authority in the delivery of enabling infrastructure.
- 6. Actively assist with landowner partnerships through being a conduit to our partners in the area such as Greenfield Development Company who Landcom partnered with to deliver Oran Park. Western Sydney University who Landcom have a strong working relationship with at Macarthur Heights.
- 7. Working with Council's within the Western Sydney Planning Partnership to deliver outcomes throughout the Western City that will provide high quality exemplars that lead high quality expectations.
- 8. Assist in consolidating areas of fragmented ownership.
- 9. Share and leverage our sustainability IP to ensure alignment with our endorsed Sustainable Places Strategy as per our approach with other Government Agencies such as Sydney Metro.
- 10. Share our University Roundtable research findings as required, and participating in projects that focus on STEM, continue our work to support employment through our Innovative Skills exchange initiative and VET (Vocational Education Training) in School Program.