

18 October 2019

7190417

Executive Director  
Compliance, Industry and Key Sites  
NSW Department of Planning, Industry and Environment  
GPO Box 39  
Sydney, NSW, 2000

Dear Sir/Madam,

**Submission to Parkes Special Activation Precinct Draft Master Plan - [REDACTED]**

This submission has been prepared by Ethos Urban on behalf of TF Hill Pty Ltd in relation to the Department of Planning, Industry and Environment (DPIE) public exhibition of the Parkes Special Activation Precinct Draft Master Plan.

TF Hill Pty Ltd is the current landowner of multiple land holdings located at [REDACTED]. These landholdings present a strategic opportunity for inclusion within the Draft Master Plan that will make a meaningful contribution towards projected employment growth within the Parkes Shire Council Local Government Area (LGA).

With a combined site area of approximately 60 ha, the TF Hill Pty Ltd landholdings offer continuous, connected and unconstrained land that provides an immediate opportunity to achieve employment growth within the Parkes Special Activation Precinct. The inclusion of these combined landholdings in the Precinct would greatly improve the efficiency and timeliness of the delivery of employment outcomes.

Whilst we acknowledge and welcome the clear intent of the Parkes Special Activation Precinct Draft Master Plan to stimulate economic development and employment, we are of the opinion that it would be remiss not to include these strategically important landholdings within Master Plan Precinct.

Further, this submission details:

- A description of TF Hill Pty Ltd key landholding in Parkes Shire Council LGA;
- TF Hill Pty Ltd support of items identified in the Parkes Special Activation Precinct Draft Master Plan;
- Discussion of specific issues identified in the Parkes Special Activation Precinct Draft Master Plan; and
- Recommendations to inform the final revision of the Parkes Special Activation Precinct Master Plan.

## 1.0 Site description

TF Hill Pty Ltd combined landholdings at [REDACTED] (as shown below in **Figure 1**):

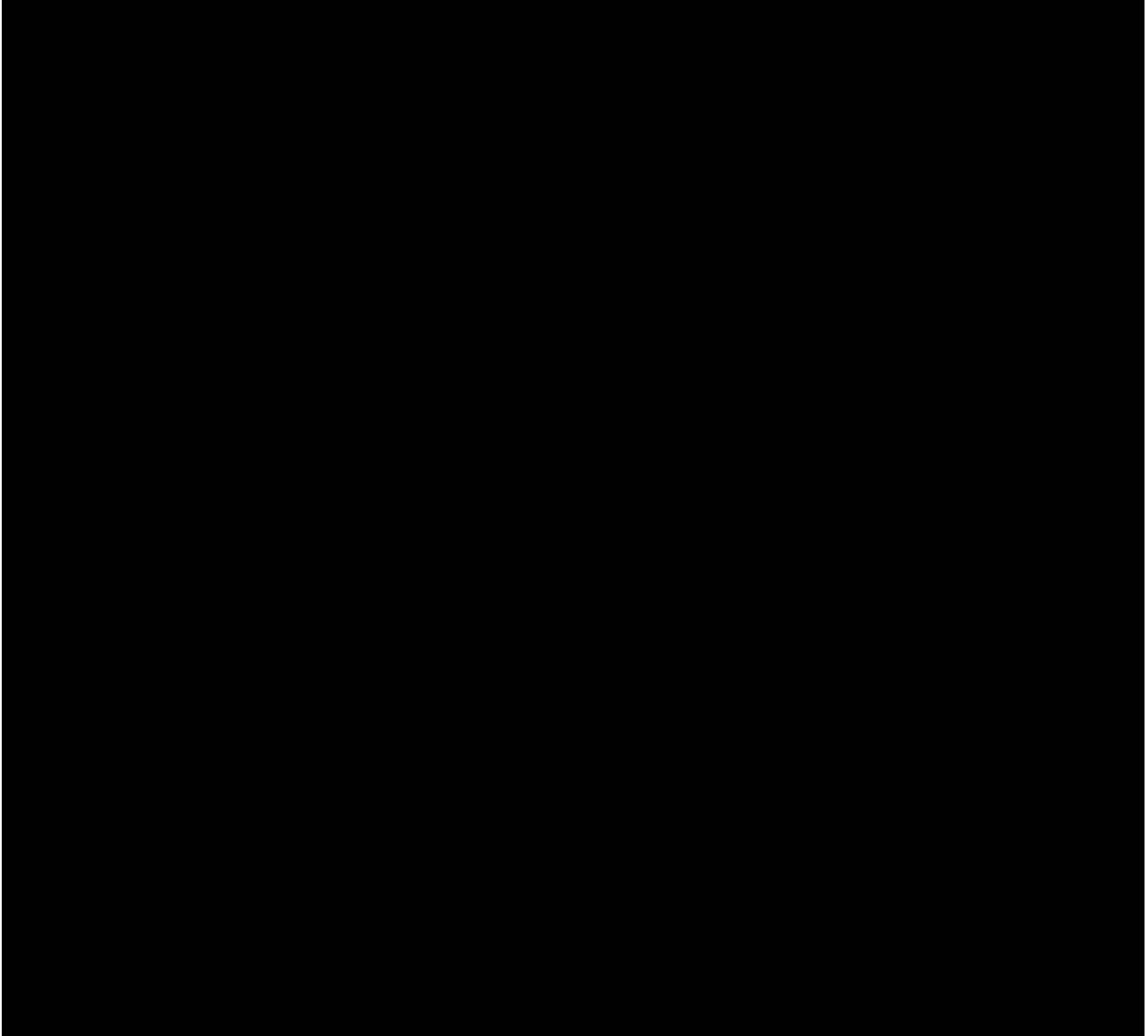
[REDACTED] (27.89 ha)

- [REDACTED]
- [REDACTED]
- [REDACTED]

Note: the combined sites had a previous site area of 43.15 ha prior to compulsory acquisition for inland rail.

(30.46 ha)

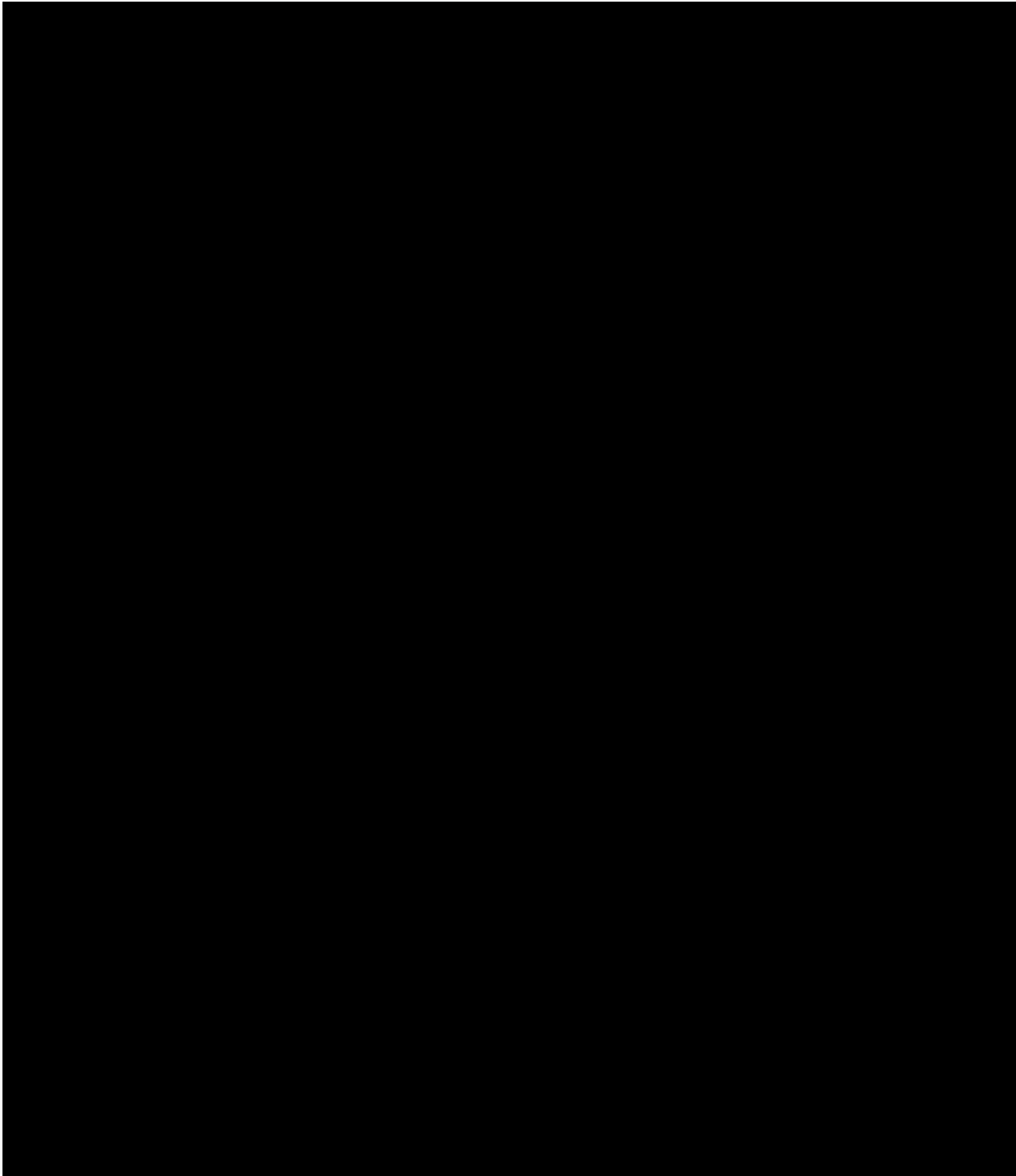
- [Redacted]



**Figure 1** Subject Landholdings at [Redacted]

Source: SixMaps – NSW Government / Ethos Urban

The combined landholdings are located on the northern fringe of the identified Parkes Special Activation Precinct (as shown in **Figure 2** below), fronting Henry Parkes Way and adjoining the “Solar sub-precinct” on the western boundary and the Inland Rail on the eastern and southern boundary.



**Figure 2 Structure Plan with Subject Site**

*Source: Parkes Special Activation Precinct Draft Master Plan – NSW Government / Ethos Urban*

## 2.0 Parkes Special Activation Precinct Draft Master Plan and Discussion

TF Hill Pty Ltd commends DPIE on the preparation of the Parkes Special Activation Precinct Draft Master Plan and their vision of:

*Stimulating economic development and employment, the Parkes Special Activation Precinct will be a hub of sustainability and enterprise that will enhance the local and regional community. Located at the epicentre of transport and logistics, Parkes will be a true inland port to national and global markets.*

Given the location of the combined landholdings, there is a logical basis for the inclusion of the sites within the Parkes Special Activation Precinct as part of the 'Regional Enterprise Sub-Precinct'.

The location of the combined landholdings on the northern fringe of the Precinct provide a number of key benefits and synergies for inclusion with the Precinct, thereby creating a natural northern barrier of the Special Activation Precinct at Henry Parkes Way.

The combined landholdings represent a significant site area (58.35 ha) of unconstrained land with excellent access to Henry Parkes Way. Given the access to a key transport route, the inclusion of the combined landholdings would not require substantial additional infrastructure.

Further, the combined landholdings provide a continuous and connected site area that, if included in the Special Activation Precinct, will minimise the potential for adverse amenity impacts associated with rail operations and future industrial and employment generating land uses on primary production lands adjoining the Precinct.

The majority of the total site area (58.35 ha) is currently zoned RU1 – Primary Production under the *Parkes Local Environmental Plan 2012* (PLEP) whereby the objective of the zone is to “encourage sustainable primary production by maintaining and enhancing the natural resource base”.

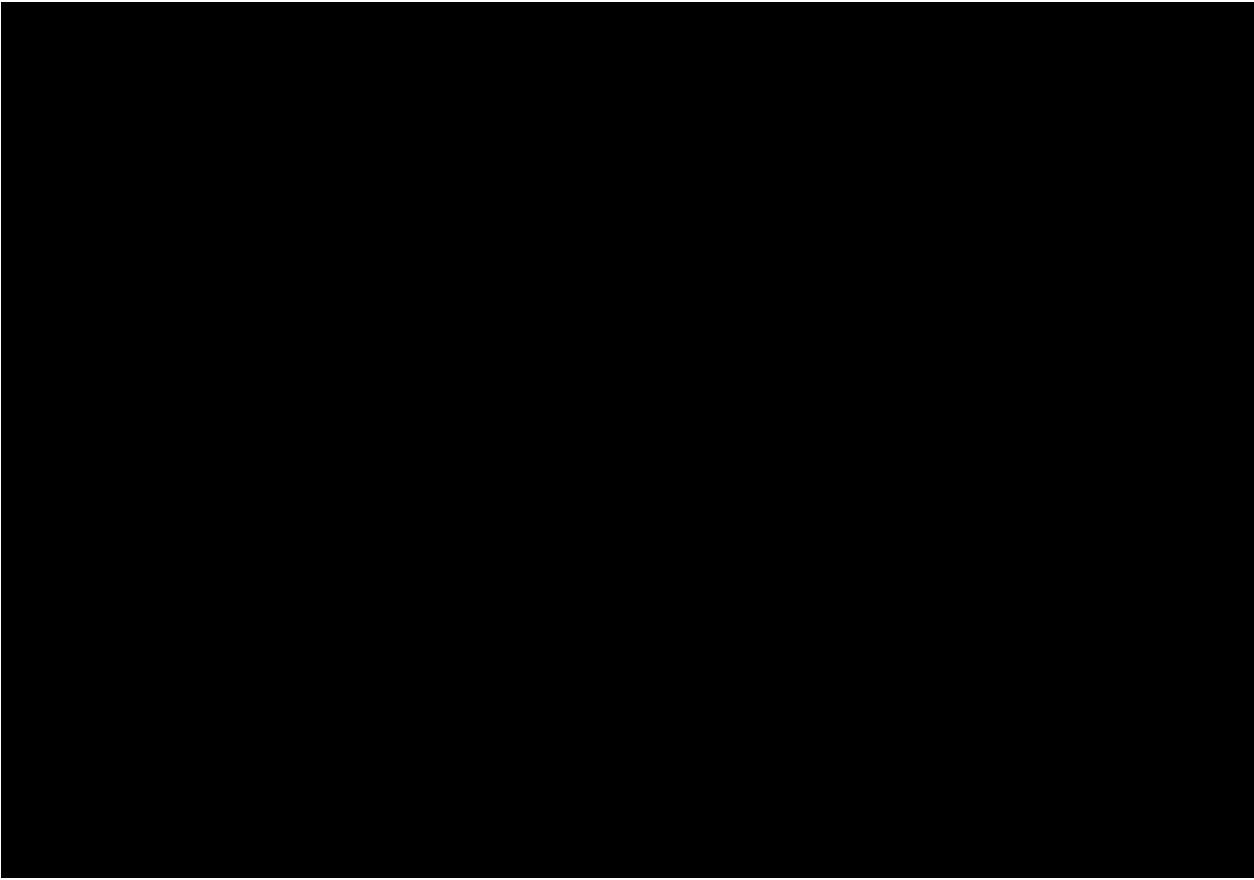
However, following the loss of 15.26 ha of the cumulative site area through compulsory acquisition for inland rail, the farming and business operations have been negatively impacted through the reduction in total site area.

The combined landholdings, in terms of the ongoing use for rural and residential purposes, are already blighted both acoustically and visually by the adjoining employment lands and infrastructure associated with the Special Activation Precinct; with the Inland Rail running along the eastern and southern boundary, the Pacific National Inter-Modal Facility to the south, the Parkes Solar Farm on the western boundary and Henry Parkes Way on the northern boundary.

As demonstrated below in **Figure 3**, the combined landholdings are identified under the PLEP as “Parkes National Logistics Hub Buffer Area” on the Parkes Township Buffer Map.

Clause 6.9 of the Parkes LEP seeks to “protect the operational environment of the Parkes National Logistic Hub” and as such, development on land to which this clause applies (including the combined landholdings) must consider “the impact that any noise and other emissions associated with the Hub would have on the proposed development” and whether there are “any opportunities to relocate the proposed development outside the land to which this clause applies” where “the proposed development is likely to adversely affect the operational environment of the Hub”.

Given the combined landholdings location within the Buffer Area and directly adjoining the existing Parkes National Logistics Hub, the viability of ongoing primary production operations on site is significantly strained and there is a logical basis for the sites to be included in Special Activation Precinct to avoid ‘adverse effect on the operational environment of the Hub’.

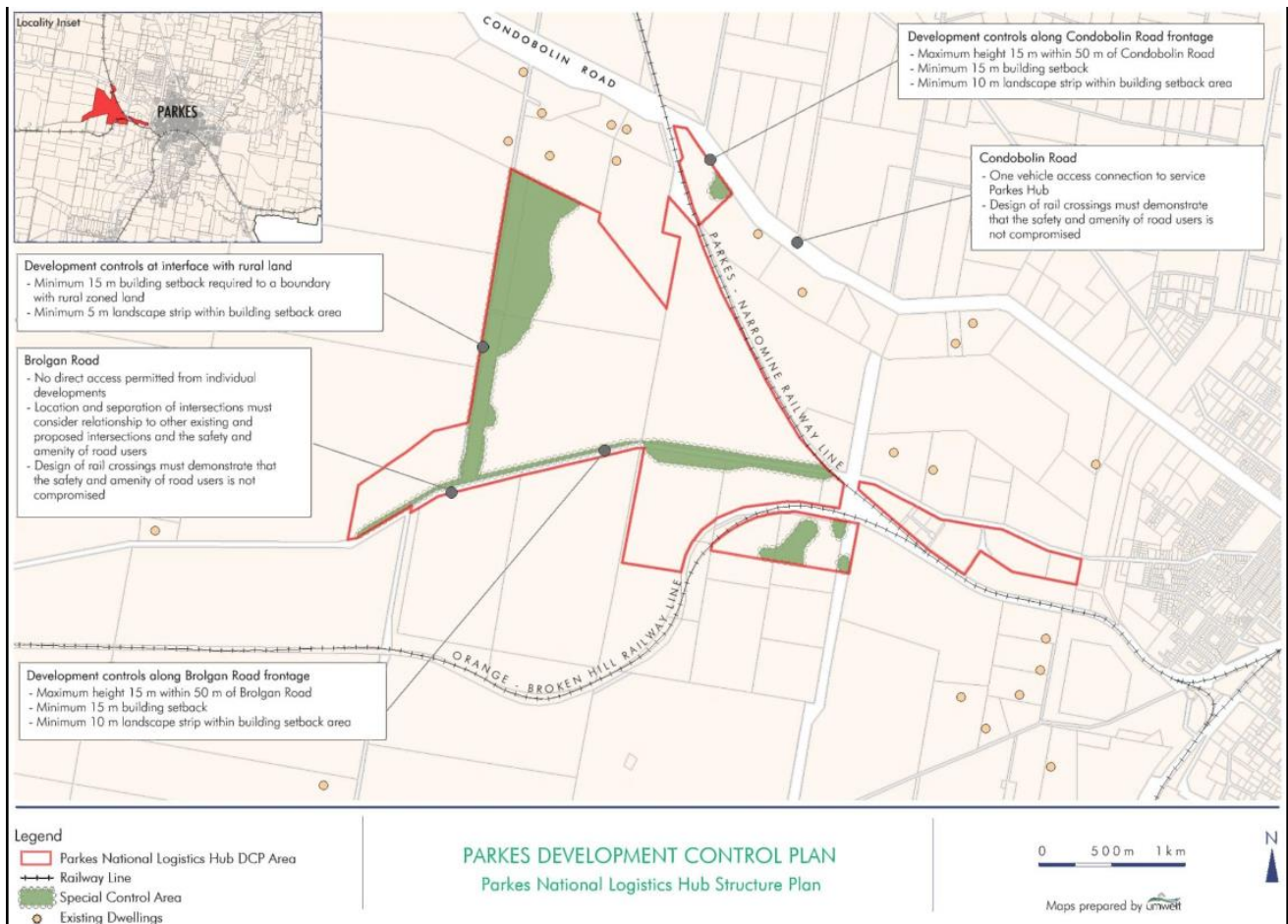


**Figure 3 Parkes National Logistics Hub Buffer Area**

*Source: Parkes Local Environmental Plan 2012 – Parkes Shire Council*

We are of the opinion that the inclusion of the combined landholdings within the Special Activation Precinct will mitigate the potential for land use conflict issues associated with primary production zoned land adjoining industrial and employment generating land uses.

The combined landholdings adjoin the existing 'Parkes National Logistics Hub' as identified within the Parkes Development Control Plan 2013 (as shown at **Figure 4**) (and zoned SP1 – Special Activities under the PLEP to the immediate south) which has been created "*as a special industrial enterprise area intended for freight and transport related industrial operations. It has been established to encourage the development of freight and transport logistics operations as it is strategically located on the main railway lines*".



**Figure 4 Parkes National Logistics Hub Structure Plan**

Source: *Parkes Development Control Plan 2013 – Parkes Shire Council*

The associated land uses and transport routes (at Brolgan Road and Condobolin Road (Henry Parkes Way)) within the adjoining Parkes National Logistics Hub have encouraged industrial development to support regional economic influences. However, the changing nature of the immediate adjoining lands has impacted the primary production operations on site and the ongoing viability of the land holdings for traditional agricultural land uses is limited. As such, there is a logical basis for the sites to be included in Special Activation Precinct rather than outside.

It is noted that earlier iterations of the Master Plan Precinct had previously included the combined landholdings however, without any explanation provided to the landowner (TF Hill Pty Ltd), these sites have been excluded from the Precinct Draft Master Plan.

In review of the technical documents prepared in support of the Special Activation Precinct Draft Master Plan, it is noted that much of the of the land proposed within the 'Regional Enterprise Sub-Precinct' is heavily flood affected (especially the land in the western part of the precinct), representing both environmental risks as well as engineering requirements that will impact on the feasibility of development and substantially undermine the viability of the precinct.

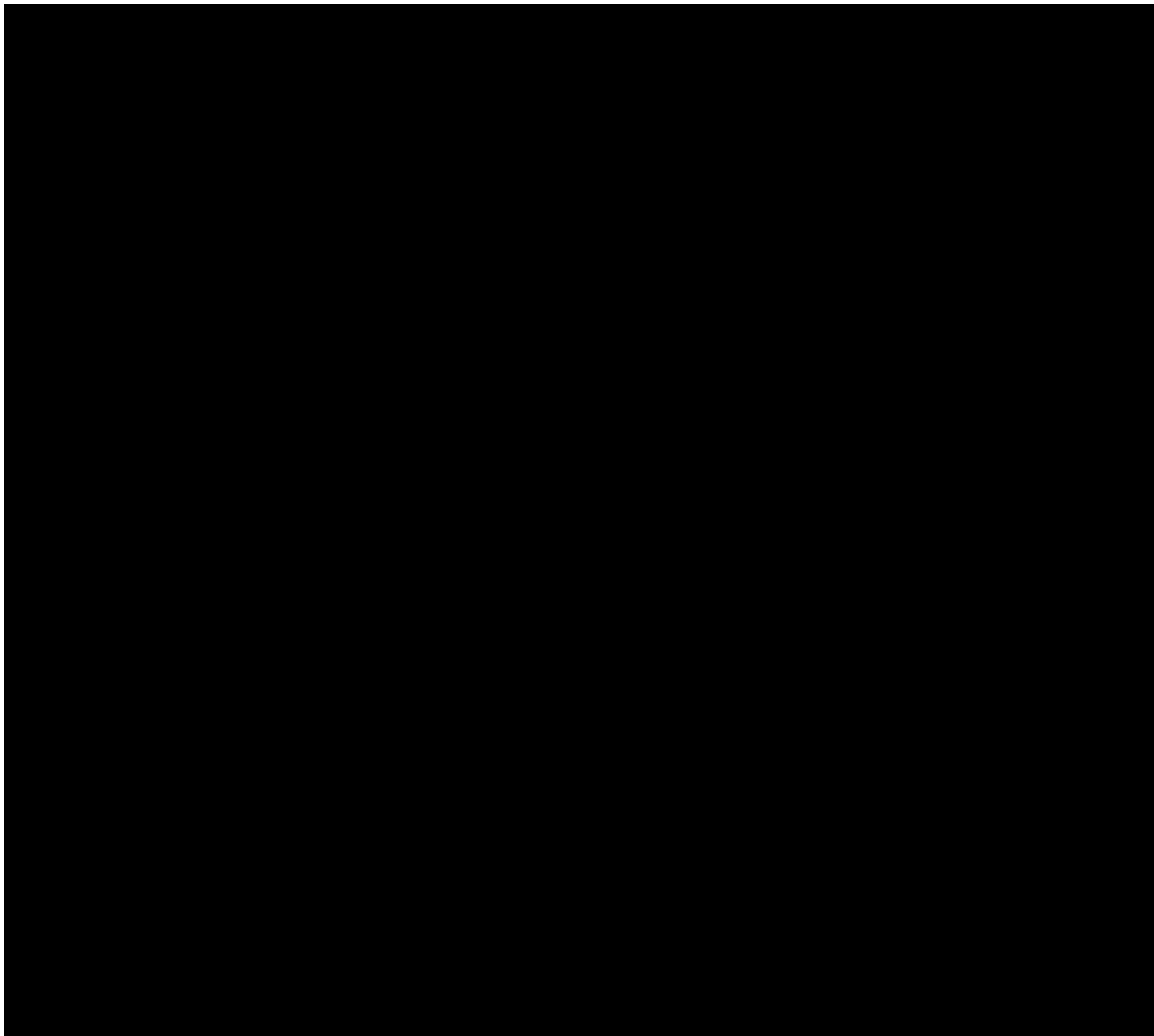
As shown in the technical documents (Flood and Water Quality Management Report prepared by WSP), the TF Hill Pty Ltd landholdings are not flood affected and represent an unconstrained addition to the Master Plan Precinct to facilitate development activity in an efficient and cost-effective way.

Importantly, the site's location and direct access to Henry Parkes Way would not require significant new road transport or utility infrastructure, providing for the critical 'first wave' of investment to occur cost effectively.

As identified in the SGS Economic and industry analysis report, the 'first wave' of investment is critical to achieving the Horizon 1 objectives (i.e. establishing the precinct) and supporting the transition to Horizon 2 (i.e. precinct maturity), which requires low barriers to entry – such as planning efficiency and land availability. With the low barriers to development inherent at the subject land, its inclusion into the Parkes Special Activation Precinct Master Plan area as part of the Regional Enterprise Sub-Precinct would provide significant low-cost opportunities for initial Horizon 1 investment, and would be able to support the transition to precinct maturity as part of Horizon 2.

In review of the Infrastructure and Transport Evaluation Report (prepared by Aurecon), it is recognised that the Parkes Special Activation Precinct "will lead to investment in common-use infrastructure, including roads infrastructure, water, electricity, telecommunications, gas systems and services, high speed internet and data connections and facilities and other possible infrastructure or services".

As demonstrated in **Figure 5**, the location of the combined landholdings has excellent access to existing regional and national road and rail transport networks and is well suited to align with the proposed infrastructure upgrades under the Master Plan (specifically the new connector road from Brolgan Road and Henry Parkes Way providing additional accessibility to the combined land holdings and a northern gateway to the Precinct).



**Figure 5 Proposed Transport Network**

*Source: Parkes Special Activation Precinct Draft Master Plan – NSW Government / Ethos Urban*

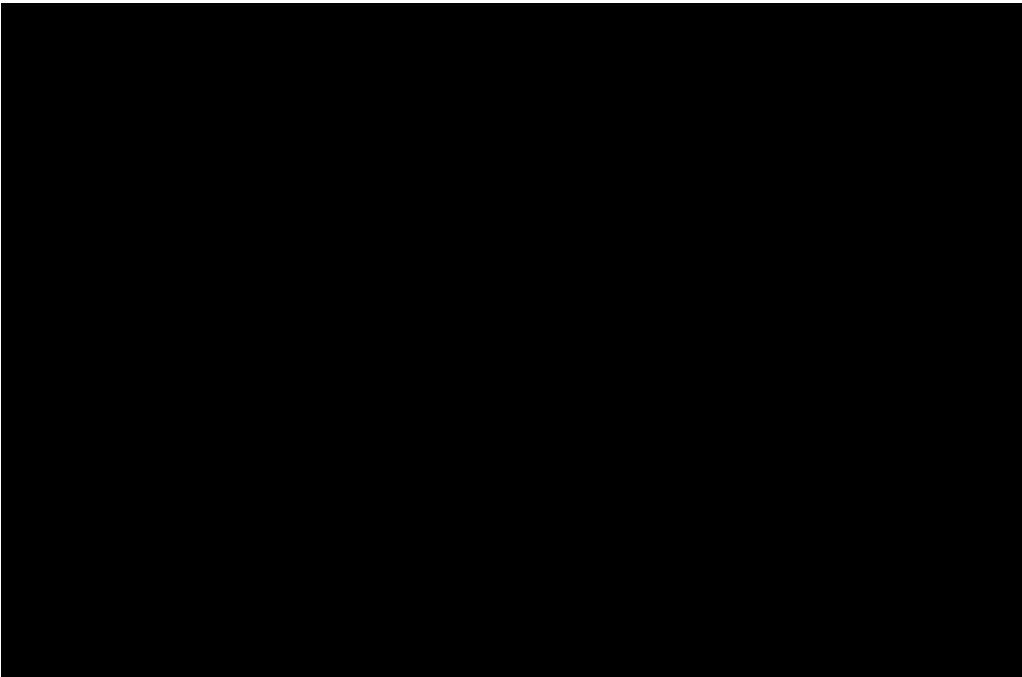
Further to the proposed transport network upgrades, the combined land holdings are ideally located to be easily connected to the proposed sewer, potable water and inset electricity networks identified within the Master Plan.

As demonstrated in **Figure 6** and **7** below, we are of the opinion that the inclusion of the combined land holdings within the Parkes Special Activation Precinct can be achieved without the need for substantial additional infrastructure and at minimal additional cost.



**Figure 6 Proposed Water Supply and Management**

*Source: Parkes Special Activation Precinct Draft Master Plan – NSW Government / Ethos Urban*



**Figure 7 Proposed Energy Network**

*Source: Parkes Special Activation Precinct Draft Master Plan – NSW Government / Ethos Urban*

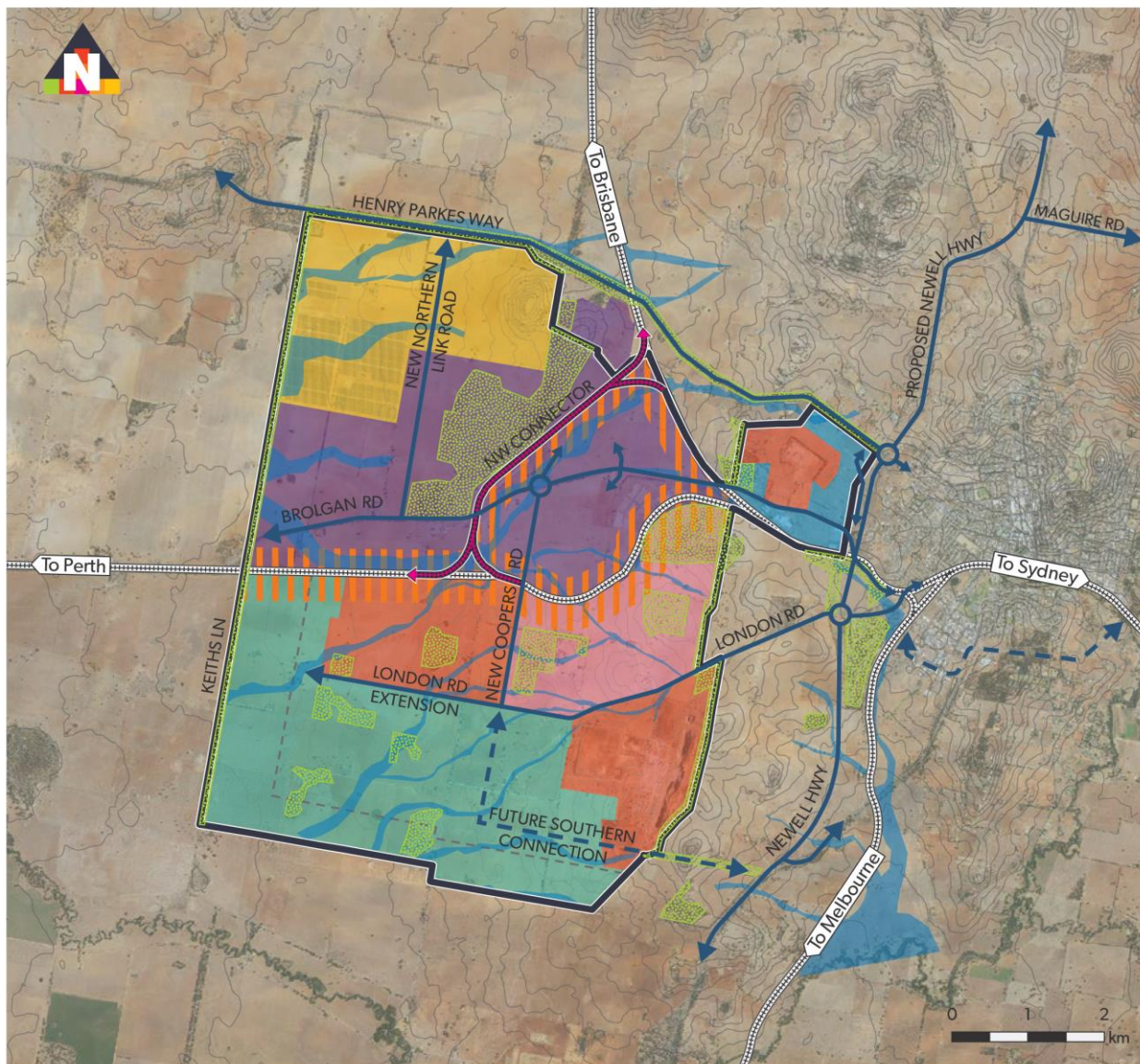


It is also recognised that the Draft Master Plan identifies a north-south green corridor (Green Infrastructure Overlay) along the western boundary of the TF Hill Pty Ltd landholdings (as detailed within the Biodiversity Assessment Report – Stage 1 prepared by WSP). The inclusion of the combined landholdings within the Special Activation Precinct enables a unique opportunity to continue this corridor to the north and provide a meaningful continuation to the Green Infrastructure Overlay (as demonstrated in **Figure 8** below). It is further recognised that the combined landholdings owned by TF Hill Pty Ltd were not ecologically surveyed as part of the preliminary studies as the appointed consultants did not have site access. TF Hill Pty Ltd are open to allowing accessing for the undertaking of surveys and investigations to better inform the Special Activation Precinct Master Plan.

### 3.0 Key recommendations

Based on our review of the Parkes Special Activation Precinct Draft Master Plan and the grounds outline above, TF Hill Pty Ltd makes the following key recommendations:

- Inclusion of the combined landholdings at [REDACTED] (legally described as [REDACTED]) within the Parkes Special Activation Precinct.
- Nomination of the combined landholdings within the 'Regional Enterprise Sub-Precinct' as identified in the Proposed Structure Plan below in **Figure 8**.
- We therefore request that the combined landholdings, directly located on and around a triangle of new and existing railways which connect the national rail networks at Parkes, be identified as the 'Regional Enterprise Sub-Precinct' as part of the heart of the Parkes Special Activation Precinct. Inclusion of the combined landholdings can further accommodate a diversity of businesses including rail and road transport terminals, warehousing, advanced manufacturing and food processing businesses.



- |   |   |                                       |
|---|---|---------------------------------------|
| Special activation precinct boundary                  | Mixed enterprise sub-precinct (330ha)   | New connection                        |
| Solar sub-precinct (665ha)                            | Commercial gateway sub-precinct (135ha) | Proposed new connection               |
| Regional enterprise sub-precinct (1240ha)             | Rail terminals overlay                  | Railway                               |
| Resource recovery and recycling sub-precinct (719ha)  | Green infrastructure overlay            | Under construction railway connection |
| Intensive livestock agriculture sub-precinct (1227ha) | Stormwater flow paths (existing)        | 1km buffer zone                       |

**Figure 8 Proposed Structure Plan**

Source: Parkes Special Activation Precinct Draft Master Plan – NSW Government / Ethos Urban

## 4.0 Conclusion

Thank you for the opportunity to provide a submission to the Parkes Special Activation Precinct Draft Master Plan. This submission has detailed the key land holdings of TF Hill Pty Ltd and their key comments and recommendations with regards to the Draft Master Plan.

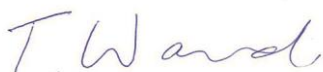
It is noted that in the preparation of this submission, TF Hill Pty Ltd sought to consult with the landowners of [REDACTED] that adjoin the combined landholdings and front Henry Parkes Way. Whilst TF Hill Pty Ltd were unable to contact the landowners of [REDACTED], the landowners of [REDACTED] concurred with the findings of this submission and would support the inclusion of their site within the Parkes Special Activation Precinct. The inclusion of this additional lot would further strengthen the merits for the boundary of the Parkes Special Activation Precinct to be extended to Henry Parkes Way as the natural northern barrier.

There are several compelling planning reasons to for the proposed recommendations, including:

- The combined landholdings represent unconstrained sites with excellent access to Henry Parkes Way. Given the access to a key transport route, the inclusion of the combined landholdings would not require substantial additional infrastructure.
- The combined landholdings already adjoin the existing 'Parkes National Logistics Hub' as identified within the Parkes Development Control Plan 2013. Following the loss of 15.26 ha of the cumulative site area through compulsory acquisition for inland rail, the farming and business operations have been negatively impacted through the reduced in total site area and are no longer considered to be viable for ongoing rural production purposes.
- The inclusion of the combined landholdings within the Special Activation Precinct will mitigate the potential for land use conflict issues associated with primary production zoned land adjoining industrial and employment generating land uses.
- The TF Hill Pty Ltd combined landholdings are not flood affected and represent an unconstrained addition to the Master Plan Precinct to facilitate development activity. The sites represent a large, contiguous and well-connected opportunity to make a meaningful contribution towards employment growth, that would improve the efficiency and timeliness of delivery of the desired outcomes of the Parkes Special Activation Precinct.
- The location of the combined landholdings has excellent access to existing regional and national road and rail transport networks and is well suited to align with the proposed infrastructure upgrades under the Master Plan without the need for substantial additional infrastructure and at minimal additional cost.
- The combined landholdings, directly located on and around a triangle of new and existing railways which connect the national rail networks at Parkes, can be identified as the 'Regional Enterprise Sub-Precinct' as part of the heart of the Parkes Special Activation Precinct. Inclusion of the combined landholdings can further accommodate a diversity of businesses including rail and road transport terminals, warehousing, advanced manufacturing and food processing businesses.

Should DPIE require any further information in relation to the matters raised in this submission, please do not hesitate to contact the undersigned.

Yours sincerely,



**Tim Ward**  
Director