[redacted]

From: [redacted]
Sent: Wednesday, 26 February 2020 2:45 PM
To: [redacted]
Subject: FW: Webform submission from: Western Sydney Aerotropolis Planning Package

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From: [redacted]] **On Behalf Of** DPE PS ePlanning Exhibitions Mailbox
Sent: Wednesday, 26 February 2020 11:12 AM
To: [redacted]
Subject: FW: Webform submission from: Western Sydney Aerotropolis Planning Package

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From: [redacted]
Sent: Tuesday, 25 February 2020 10:36 AM
To: [redacted]
Subject: Webform submission from: Western Sydney Aerotropolis Planning Package

Submitted on Tue, 25/02/2020 - 10:25
Submitted by: Anonymous
Submitted values are:
Submission Type:I am submitting on behalf of my organisation
First Name: [redacted]
Last Name: [redacted]
Name Withheld: Yes
Email: [redacted]
Suburb/Town & Postcode: [redacted]
Submission file:
suttons-submission-on-the-western-sydney-aerotropolis-plan---25-february-2020.pdf

Submission: Please see submission attached dated 25 February 2020.

URL: https://pp.planningportal.nsw.gov.au/draftplans/exhibition/western-sydney-aerotropolis-planning-package

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[redacted]

25 February 2020

Mr Andrew Jackson
Director
Planning Partnership Office
PO Box 257
Parramatta, NSW 2124

Dear Andrew,

SUBMISSION ON THE WESTERN SYDNEY AEROTROPOLIS PLAN AND SUPPORTING DOCUMENTS

This submission has been prepared on behalf of Suttons Motor Group (Suttons) in response to the release of the *Western Sydney Aerotropolis Plan* (draft Plan) and supporting documents including:

- Draft Western Sydney Aerotropolis Development Control Plan (Phase 1);
- Western Sydney Aerotropolis Proposed SEPP Discussion Paper;
- Draft Ministerial Direction; and
- Aerotropolis SEPP Maps.

Suttons welcomes the opportunity to comment on the draft Plan and commends the Planning Partnership Office for continuing work on the Western Sydney Aerotropolis and rezoning the initial precincts by the end of 2020.

For ease of reference, this submission has been divided into the following key sections:

- **About Suttons Motor Group**: Overview of the company and planning history of their site in relation to the Aerotropolis; and
- **Comments and recommendations on Western Sydney Aerotropolis Exhibition Package**: Summary of comments and recommendations on the draft Plan and supporting documents.

In summary, it is [redacted] submission for the Planning Partnership Office to adopt the following recommendations:

1. **[redacted] supports the identification of Badgerys Creek Precinct as an initial precinct and agree that the precinct will be an important contributor to the creation of employment opportunities and coordination of infrastructure within the Aerotropolis.**
2. **The Planning Partnership Office must adhere to the timeframes set out in the Western Sydney Aerotropolis Plan, as it has set a clear market expectation. If there is any divergence or delays to the program it must be clearly communicated to the public.**
3. **[redacted] supports the vision for Badgerys Creek Precinct within the draft Plan. Suttons support the proposed Enterprise zone on their site as it provides for significant flexibility in relation to the desired future land uses for the precinct.**
4. **Clarity is requested on the role and function of isolated special activity zones and their contribution to Airport operations and compatibility with adjacent Enterprise zone sites in the Badgerys Creek Precinct.**
5. **Any additional lands to be zoned Infrastructure must be identified as soon as possible to provide certainty to landowners on any implications to their sites.**
6. **The Planning Partnership Office must confirm the planning pathway for landowners to seek development consent once precincts are rezoned and prior to precinct planning being finalised.**
7. **Confirmation is requested on the design and delivery of the Eastern Ring Road, including any additional land acquisition requirements. This has the potential to significantly impact upon the viability of [redacted] landholding for future redevelopment.**
8. **Infrastructure contributions mechanisms must be made publicly available as soon as possible. Landowners cannot make an informed decision without further detail on this matter. This is an important input into viability of future development within the Aerotropolis.**
9. **The Aerotropolis SIC should not be calculated on a unit base charge without proper consultation with industry groups. The implementation of a unit base charge can significantly affect the future viability of development within the growth area.**
10. **The NSW Government, Planning Partnership Office and local councils must consider the cumulative effect of several infrastructure levies on future development prior to implementation in particular any SIC levy related to environmental conservation.**

[redacted]

1. ABOUT [redacted]

[redacted]

1.1. ABOUT [redacted] LANDHOLDING

[redacted] Badgerys Creek, also known as [redacted] under [redacted] The site is located to the south of Elizabeth Drive at its intersection with Martin Road. The current zoning is RU1 Primary Production under the *Liverpool Local Environmental Plan 2008*. The site location is shown in **Figure 1** below.

Figure 1 Site Location

The site is within the Badgerys Creek Precinct in the Western Sydney Aerotropolis. The proposed land use within the Structure Plan is flexible employment and proposed to be zoned 'Enterprise' under the proposed Aerotropolis State Environmental Planning Policy (Aerotropolis SEPP).

2. COMMENTS AND RECOMMENDATIONS ON THE WESTERN SYDNEY AEROTROPOLIS EXHIBITION PACKAGE

Suttons welcomes the opportunity to comment on the Western Sydney Aerotropolis Exhibition Package and commends the Planning Partnership Office on continuing its work on

setting the planning framework for this significant growth area and establishing timeframes for the rezoning of initial precincts by the end-2020.
Suttons have several comments and recommendations regarding the Western Sydney Aerotropolis Plan that require further clarification or reconsideration prior to the finalisation of the exhibited documents. These issues are critical to Sutton's site and the ability to contribute to the Western Parkland City vision in the short, medium and long term.

2.1. TIMING AND DELIVERY OF INITIAL PRECINCTS

The Aerotropolis comprises of 10 precincts, six of which are identified as initial precincts including the Badgerys Creek Precinct. The planning and delivery of this precinct has been brought forward to help create early employment opportunities and better coordinate infrastructure. Suttons supports the Planning Partnership Office on identifying Badgerys Creek Precinct as an initial precinct. This precinct is an important contributor to the overall Western Parkland City vision with Elizabeth Drive acting as a gateway to and from the Western Sydney International (Nancy-Bird Walton) Airport.

Suttons appreciate the Planning Partnership Office identifying timeframes for the initial precincts including:

- Rezoning of the initial precincts by mid-2020;
- Exhibiting draft precinct plans by mid-2020; and
- Finalisation of precinct plans by late 2020.

The identification of these timeframes has set a clear expectation to the market on when development within these initial precincts can commence. As such these timeframes must be adhered to as financial decisions are currently being made based on these strategic planning documents. If there is a delay to the program it is imperative that the Planning Partnership Office communicate the revised timeframes immediately. Suttons is committed to working with the Planning Partnership Office and Liverpool City Council on delivery Airport-compatible uses which contribute to the Western Parkland City vision.

RECOMMENDATIONS:

1. **supports the identification of the Badgerys Creek Precinct as an initial precinct and agree that it will be an important contributor to the creation of future employment opportunities and coordination of infrastructure within the Aerotropolis.**
2. **The Planning Partnership Office must adhere to the timeframes set out in the Western Sydney Aerotropolis Plan, as it has set a clear market expectation. If there is any divergence or delays to the program, these changes must be clearly communicated to the public.**

2.2. VISION FOR BADGERYS CREEK PRECINCT

The draft *Western Sydney Aerotropolis Plan* outlines the following vision for Badgerys Creek Precinct:

> *"Directly adjoining the Airport to the east, the Badgerys Creek Precinct will support airport operations, the new urban centre in the Aerotropolis Core to the south and the Northern Gateway to the west. The precinct will meet demand for a range of employment generating uses that benefit from its proximity to the airport operations and the new urban centre, but do not require direct access to high capacity public transport. The precinct is not suitable for noise sensitive land uses such as residential, schools and hospitals. Defence and aerospace and technology-based industry which complements and supports the Aerotropolis Core may also locate here."*

supports the vision of Badgerys Creek Precinct.

RECOMMENDATIONS:

3. supports the vision of Badgerys Creek Precinct.

2.3. PLANNING FRAMEWORK

The new environmental planning instrument (EPI), the Aerotropolis SEPP, was identified to support the delivery of the Western Sydney Aerotropolis and to achieve the strategic vision and objectives outlined in the draft Plan.

site is proposed to be zoned Enterprise zone. The intent of this zone is to permit land uses complementing the functions of the city and the Airport as a 24-hour transport hub.

support both the objective and land uses proposed for the Enterprise zone and agrees that the zone will enables a range of commercial and industrial sectors, including *inter alia* vehicle sales or car hire premises.

Notwithstanding the above, further clarity is requested on the role and function of the Special Activities zone. While it is understood to contribute to the Airport operations, there are fragmented parts of land proposed to be zoned Special Activities including the site adjacent to site. The Aerotropolis SEPP Discussion Paper and the draft Plan must explain the role of these fragmented Special Activity zones in contributing to Airport operations and if they are compatible with the adjacent Enterprise zones.

In addition, we note that an Infrastructure zone is proposed adjacent to Suttons' site for Elizabeth Drive. This zone is appropriate for Elizabeth Drive as it is a major east-west corridor providing connection to and from the Airport. It is understood that as additional infrastructure is identified the Infrastructure zone will be amended. It is important for this to be identified as soon as possible and communicated to landowners to enable a clear understanding on the implications to their landholdings.

The draft Aerotropolis SEPP and Development Control Plan has identified the planning mechanisms to deliver the Aerotropolis. The Planning Partnership Office, now, must confirm

[redacted]

the Planning Pathway avenues for landowners to seek development consent at either the State or local government levels. This is an important consideration on the timing and delivery of development within the Aerotropolis.

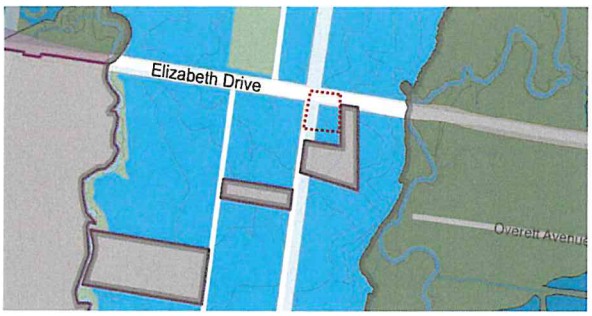
RECOMMENDATIONS:

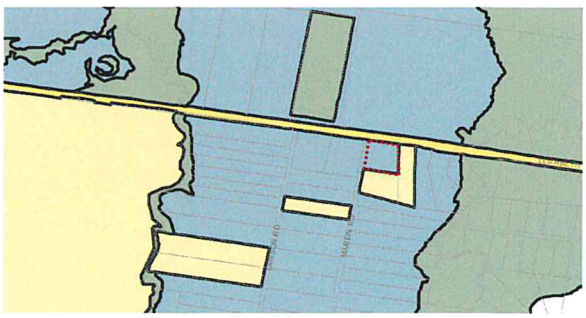
4. **[redacted] support the proposed Enterprise zone on their site.**
5. **Clarity is requested on the role and function of isolated special activity zones and their contribution to Airport operations and compatibility with adjacent Enterprise zone sites in the Badgerys Creek Precinct.**
6. **Additional infrastructure items to be zoned Infrastructure must be identified as soon as possible to provide certainty to landowners on any implications to their sites.**
7. **The Planning Partnership Office must confirm the planning pathway for landowners to seek development consent once precincts are rezoned.**

2.4. FUTURE ROAD NETWORK

There are two roads adjacent to [redacted] site including Elizabeth Drive and Eastern Ring Road. Elizabeth Drive is an established road which will be upgraded to support the future Airport operations and Aerotropolis. In contrast, the Eastern Ring Road is a future road with limited information provided as to its final alignment, the design and delivery.
In the draft Plan, the Eastern Ring Road is identified as a key freight link serving the Airport and the Airport Commercial Precinct to support economic activities along the corridor. The potential impacts of this road on [redacted] site are unknown in particular the quantum of land that would be required for any future acquisition. It is requested for further information in relation to this road alignment be made publicly available. The Structure Plan provides an indicative alignment, whereas the future road is not identified on the future zoning map (refer to **Figure 2** below). Further detail must be provided on the timing and delivery of this road, including additional land required for its delivery. In addition, confirmation of any corridor protection mechanism must be communicated if this road will be zoned under the Infrastructure zone in the Aerotropolis SEPP.

Figure 2 Comparison between Structure Plan and Future Land Zoning Map (Subject site shown in Red hatched boundary)





Picture 1 Structure Plan

Picture 2 Proposed Zoning

Source: Planning Partnership Office

[redacted]

RECOMMENDATIONS:

8. **Confirmation is requested on the design and delivery of the Eastern Ring Road, including additional land acquisition requirements. This has a potential impact on the viability of Suttons' site for future redevelopment.**

2.5. INFRASTRUCTURE CONTRIBUTIONS

The quantum of infrastructure contributions are an important consideration in the viability of future development. The draft Plan identifies the Western Sydney Place-based Infrastructure Compact (PIC) as the mechanism to determine the infrastructure required to support the Aerotropolis. The PIC will inform the precinct plans and the Special Infrastructure Contribution (SIC) for the growth area. No details are available at the time of exhibition on the inputs used or the infrastructure items being identified. This is a critical set of information that must be made publicly available prior to the rezoning of the initial precincts.
Landowners cannot make an informed submission on the planning and delivery of the Aerotropolis without information on future infrastructure contributions. For example, the draft Plan states the SIC is currently being prepared by the Department of Planning, Industry and Environment (DPIE). It notes DPIE is exploring whether the Aerotropolis SIC should be set as a land-based charge (e.g. per net developable hectare) and/or a unit based charge (per lot or percentage of CIV). If DPIE decides to go with the later, this will have significant implications on development feasibility. If the NSW Government seeks to implement such a radical change to infrastructure contributions it must be consulted with industry groups prior to implementation.
In addition to the SIC, local infrastructure contributions and additional value capture mechanisms are being explored. It is imperative that the NSW Government, Planning Partnership Office and local councils consider the cumulative effects of several infrastructure levies future development prior to implementation.

RECOMMENDATIONS:

9. **Infrastructure contributions mechanisms must be made publicly available as soon as possible. Landowners cannot make an informed decision without further detail on this matter. This is an important input into viability of future development within the Aerotropolis.**
10. **The Aerotropolis SIC should not be calculated on a unit base charge without proper consultation with industry groups. The implementation of a unit base charge can significantly affect the future viability of development within the growth area.**
11. **The NSW Government, Planning Partnership Office and local councils must consider the cumulative effect of several infrastructure levies on future development prior to implementation.**

3. CONCLUSION

supports the Western Sydney Aerotropolis vision and its aim to achieve a prosperous Aerotropolis in the short, medium and long term. We request the consideration of comments and recommendations contained within this submission prior to the finalisation of the draft Plan and implementation of the new Western Sydney Aerotropolis SEPP and Development Control Plan.

welcomes the opportunity to contribute and collaborate further to the planning of Western Sydney and welcomes further discussion to ensure the success of the Aerotropolis. If you have any questions please do not hesitate to contact me at michael.winnem@suttons.com.au .

Yours sincerely,