



FW: Webform submission from: Western Sydney Aerotropolis Planning Package

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Subject: Webform submission from: Western Sydney Aerotropolis Planning Package

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Submitted by: Anonymous Submitted values are:

Submission Type: I am submitting on behalf of my organisation

First Name: Andrew Last Name: Scully Name Withheld: No

Email:

Suburb/Town & Postcode: Sydney 2000

Submission file:

Submission: Please see attached.

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



Our Ref: PNL:913953

27 February 2020

Western Sydney Planning Partnership PO Box 257 Parramatta NSW 2124

Dear Sir/Madam

Jacfin Pty Ltd Submission on the Aerotropolis Planning Package

We refer to the exhibition of the Aerotropolis Planning Package and **enclose** a submission on behalf of our client, Jacfin Pty Ltd (**Jacfin**).

Jacfin is the owner of approximately 271ha of land which is being progressively developed for employment purposes, consistent with the zoning of that land under the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA).

Jacfin commends the Western Sydney Planning Partnership for advancing a city creating initiative which will deliver multi-generational benefits to the people of western Sydney. Whilst Jacfin's landholdings fall outside the Aerotropolis, it has a long-term commitment to the growth and success of the Aerotropolis and the WSEA.

Jacfin recognises that the Aerotropolis planning package presents a unique opportunity to develop a symbiotic relationship between the WSEA and the Aerotropolis, to promote economic growth and significant employment generation in western Sydney.

In order to support the continued growth and evolution of the WSEA, Jacfin believes that the planning controls for the Aerotropolis must be inherently flexible and work to foster emerging land uses, so as to facilitate the achievement of the employment objectives of both the WSEA and the Aerotropolis.

Jacfin looks forward to working with the Western Sydney Planning Partnership and would appreciate the opportunity to meet to further discuss its submission.

Please contact the undersigned should you have any questions.

Yours faithfully

Paul Lalich
Partner

HWL Ebsworth Lawyers

Andrew Scully
Senior Associate
HWL Ebsworth Lawyers

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Level 14, Australia Square, 264-278 George Street, Sydney NSW 2000 Australia

GPO Box 5408, Sydney NSW 2001 Australia

Facsimile 1300 369

DX 129 Sydney hwlebsworth.com.au

Telephone +61 2 9334 8555 Facsimile 1300 369 656 (Australia) +61 2 8507 6584 (International)

ABN 37 246 549 189

Adelaide Brisbane

Canberra

Darwin

Hobart

Melbourne

Norwest

Perth

Sydney



26 February 2020

Western Sydney Planning Partnership

Online lodgement via https://www.planningportal.nsw.gov.au/

Dear sir / madam,

SUBMISSION TO THE AEROTROPOLIS PLANNING PACKAGE ON BEHALF OF JACFIN PTY LIMITED

This submission has been prepared by Ethos Urban on behalf of Jacfin Pty Limited (Jacfin) in response to the exhibition of the draft Western Sydney Aerotropolis planning package.

Jacfin owns significant landholdings within the Western Sydney Employment Area (WSEA), including:

- Aldington Road, Kemps Creek (100 ha);
- at Eastern Creek Drive, Eastern Creek (80.54 ha);
- at Eastern Creek Drive, Eastern Creek (5.68 ha); and
- at Old Wallgrove Road, Eastern Creek (84.6 ha).

While Jacfin's landholdings are outside the Aerotropolis, it has an interest in the planning package due to its long-term and ongoing commitment to the growth and diversification of economic activity in the WSEA, as well as the inter-relationship of development and economic activity between the WSEA and the Aerotropolis.

Jacfin commends the Western Sydney Planning Partnership on advancing a genuinely city shaping initiative, which will capture significant opportunities for NSW and Australia. We also recognise the significant opportunities growth of the Western Sydney (Nancy Bird Walton) Airport will bring to the WSEA. The spatial and economic relationships between the WSEA and Aerotropolis can be expected to drive complementary development, growth, and diversification of economic and employment generating uses. Jacfin has long-standing and detailed knowledge of the growth and evolution of industrial and employment generating activity in WSEA, and understands the diverse influences that should be factored into the next phases of planning.

This submission outlines:

- (1) Aspects of the Aerotropolis Planning Package that Jacfin supports.
- (2) Opportunities for greater alignment with existing State-led strategies.
- (3) Trends that Jacfin has observed within the WSEA, which should inform planning for WSEA and the Aerotropolis.
- (4) Major trends within the industrial sector that are likely to influence the WSEA, which should also inform the Aerotropolis package due to its linkages to strategic policy for the WSEA.
- (5) Recommended changes to the Aerotropolis planning package.

Jacfin would appreciate the opportunity to meet with the Western Sydney Planning Partnership and DPIE to discuss the content of this submission, and how our knowledge of the area can benefit planning for the Aerotropolis and WSEA.

1.0 Positive aspects of the draft Aerotropolis package

Firstly, Jacfin wishes to express support for the Aerotropolis initiative itself, noting that 1.1 million people are expected to reside in the Western Parkland City by 2036, and this massive population growth will drive a need for more jobs and a more diverse western Sydney economy. Jacfin is also encouraged by the exceptional alignment across three levels of government between infrastructure and land use planning, with major investments in an airport, and road and rail infrastructure. This demonstrates enormous commitment from governments to catalyse the needed development within the Aerotropolis and its surrounds.

Among other things, we express our support for the following aspects of the planning package:

- Timeliness: The Western Sydney Planning Partnership and the State government are to be commended on undertaking
 this planning work at a critical juncture, when employment land is needed and opportunities exist to create a globally
 connected employment corridor. It is also to be commended on committing to plan the initial precincts by mid-2020 and
 finalise the planning by late 2020. Delaying action to plan for the future in the Aerotropolis will only lead to missed
 opportunities and less than optimal outcomes.
- Connectivity: The unprecedented linkages proposed between Western Sydney, Greater Parramatta, and the Harbour City will contribute significantly to business efficiency and access to markets at all scales.
- Relationship with WSEA: Jacfin supports the recognition given to the WSEA as a co-contributor to creating thousands
 of new jobs and providing synergies to support economic and employment growth.
- The following strategic outcomes:
 - "Promote connectivity between the WSEA and other precincts in the Aerotropolis."
 - "Protect a Western Sydney Freight Line corridor to preserve freight and distribution opportunities."
- The following implementation strategy:
 - "Planning for the Intermodal Terminal will provide for the operational requirements of a viable terminal site, including a minimum site area of approximately 100 hectares (measuring up to 2 km in length and at least 500 metres in width) (Department of Planning, Industry and Environment)."

2.0 Potential for better alignment with current strategy

While Jacfin supports aspects of the Aerotropolis planning package, we observe that references to the WSEA within the package are heavily weighted towards the WSEA's role in catering for freight, warehousing, and logistics. While Jacfin recognises the importance of this industrial sub-sector in capturing economic advantages for NSW and Australia, there are broader strategic opportunities beyond this designated role which can be captured, without undermining the WSEA's key role. WSEA has traditionally provided low cost and well located land for these purposes, and will continue to do so. However, it is also important to recognise that the nature of industrial and employment generating uses in WSEA is already maturing, and there is an increasing need for businesses to integrate freight and logistics with a range of other functions, many of which demand are more diverse and highly skilled workforce, and which have different spatial requirements and demand higher levels of amenity. It is critical that the Aerotropolis Plan doesn't stifle the evolution of WSEA into a more complex, diverse and economically sustainable precinct.

Connecting population growth with diverse employment

A significant number of new residents will live in western Sydney, in particular in the North West Growth Area, South West Growth Area, and the Greater Penrith to Eastern Creek Investigation Area (where urban renewal is desired). This housing growth needs to be connected with employment growth to support the 30-minute city objective for Greater Sydney.

To achieve this, it is important to supply both job diversity and grow employment numbers. Jacfin recognises that this will be achieved to a large extent by means of the Aerotropolis and the logistics and warehousing functions of the WSEA. However, there are also several industrial businesses that would further boost job diversity and numbers, which require cost effective land

and/or rents (which are more likely to be available in the WSEA than in the Aerotropolis). This additional opportunity is significant and is yet to be capitalised upon, as changes have been occurring in the WSEA organically, rather than by design.

Jacfin accordingly advocates, not only for further planning in the WSEA, but greater consideration of the WSEA's potential in the drafting of the Aerotropolis documentation.

Leveraging infrastructure investment

The NSW government is investing heavily in infrastructure, including the Western Freight Line and significant road upgrades within and surrounding the Mamre Road Precinct. It is also progressing a business case to evaluate whether it can invest further in the potential Western Sydney Intermodal. Further, we note that the WSEA enjoys the benefits of access to the Moorebank Intermodal, Western Sydney Airport, and the planned M12 and M9 orbital motorways. These projects will support growth in Western Sydney, and increase the accessibility and exposure of this employment land, making it more appealing to industrial occupiers.

This underpins the case for enabling the highest and best use of land within the WSEA. Within the Mamre Road Precinct (which has recently been subject to a draft structure plan, and is intended to form part of an expanded WSEA), the greatest value of this infrastructure will be unlocked through warehousing and logistics, aligning with the wider strategic planning to link the precinct to Port Botany and the Western Sydney Airport and Aerotropolis. For the established parts of WSEA, which are further advanced and where the evolution of businesses is more progressed, the planning context is more complex. There are opportunities in these existing parts to facilitate a greater diversity of uses, tapping into market trends of integrated business models which are already manifesting themselves in the area. These opportunities, combined with existing and future infrastructure investment, create a powerful case for planning the next phase of growth in the greater WSEA, as we demonstrate in this submission.

3.0 Emerging trends in the WSEA

The WSEA has experienced significant development, which is predominantly attributed to the warehousing and freight sector. The ongoing need for this sector to grow is acknowledged, with links to Port Botany and the Western Sydney Airport to enable 'last mile' delivery.

It is also noted that the release of land within the Mamre Road Precinct (as per the recently exhibited structure plan package) will secure this role, locating additional warehousing and logistics uses within immediate proximity of a planned logistics hub. Jacfin believes this precinct will play a critical role, as we observe that more mature precincts in the WSEA are seeing increases in land value and/or rents, which may not be attractive for stand-alone logistics and warehousing businesses that required large areas of land and have relatively low employment density and diversity. The area is also experiencing the emergence of more advanced and integrated business operations. For instance, Jacfin is aware of businesses in the WSEA that include offices and other functions, including service and repairs, specialist design, engineering and maintenance functions, and related worker amenities. Such businesses are changing the mix between warehouse and office space, and driving the need for different floorspace requirements to accommodate more skilled, specialised and (in some cases) office-based jobs. There are also businesses such as Fujitsu and Ricoh in WSEA, which offer advanced product customisation services, beyond their warehousing functions.

Enabling these businesses to evolve in a rapidly changing commercial environment is critical for the NSW economy to remain competitive, and the WSEA is an appropriate and 'in demand' location for this transition to occur. Evidence from existing and emerging businesses that are Jacfin tenants provides early insights into the importance of enabling the evolution of the WSEA beyond a 'traditional' industrial area. It also demonstrates that the area has potential for more diversified and specialised land uses, which provide greater return on investment for businesses, greater job diversity and economic opportunities for the area, and will contribute to achieving many of the employment and economic goals of the Greater Sydney Region Plan and Western City District Plan.

Therefore, while we agree the draft Aerotropolis Plan's description of WSEA is relevant to the historical development of WSEA, it does not reflect the direction that many established and new businesses are taking in WSEA, with the evolution of warehousing and logistics uses through changing technology, increased customisation of products to meet customer needs, and demand for a more diverse, educated and talented workforce and increased employment densities. The Aerotropolis Plan must recognise that WSEA is changing and that these changes reflect the evolution of businesses in ways that will complement rather than compete with government objectives for the Aerotropolis.

4.0 Drivers for further planning

Major trends are re-shaping how industries operate and compete within local, state, and international markets. These trends are relevant to planning for the Aerotropolis, the WSEA, and the spatial and economic relationships between the two areas. We particularly draw attention to the following matters.

Automation

Automation continues to drive changes within the industrial sector, including the warehousing and logistics sub-sector. Innovations such as block chain technology and IoT are being increasingly adopted, enabling significantly improved communication, tracking, and decision making across supply chains. For instance, businesses that have traditionally been reliant on their channel partners for managing external data and transactions (which they could not see or track) are now using block chain technology. This enables them to see transactions associated with primary production and materials sourcing through to secondary production (e.g. manufacturing) and finally distribution. As a result, businesses are able to make smarter decisions based on improved tracking, forecasting, intelligent pricing, and nimble collaboration with supply chain partners.

Two key implications are that:

(1) A skilled work force will become increasingly important.

This has relevance to the Aerotropolis and WSEA, as automation is driving demand for different skills and qualifications (e.g. coding, design and management of information systems, robotics, and other evolving business solutions). This changes the mix of workers in industrial areas and, by extension, the nature of the employment areas which now need to cater for a greater mix of labour and knowledge-based businesses. It also influences physical design, as a more knowledge intensive workforce generates different spatial and amenity requirements for their working environment.

This matter is relevant to both the Aerotropolis and the WSEA.

(2) While the business and monetary efficiencies from automation will increase benefits to the NSW economy, the number of people employed by some industrial sectors may decrease.

The principal implication is that it is important to have a clear strategy on the macro economic objectives of the employment land – whether the underlying intention is to boost the monetary value added to the NSW economy, or provide jobs for existing and planned residential communities, or both. This decision should influence the land use mix that is planned or supported within the Aerotropolis and the WSEA.

Adverse environmental and amenity impacts

Advances in technology are continuously mitigating or negating environmental impacts associated with traditional industrial uses. As such, previous approaches to planning for industrial land, intended to contain impacts associated with polluting industrial operations, are becoming increasingly outdated. At the same time, workforce changes are driving demand for higher amenity working environments, with access to high quality floorspace and other amenities including outdoor space, convenience retail and food and beverage outlets, and facilities for conferences and meetings. Increased employment densities are also driving pressure to improve amenity in employment precincts like WSEA. This context is critical in scoping the role of future urban services and employment lands.

Industry maturation

As we have discussed, it is important to note that the more established areas in the WSEA are maturing and evolving. This should influence the policy discussion in the Aerotropolis package, which should not assume that, because WSEA has historically been dominated by these uses, WSEA's role is restricted to warehousing and logistics. These uses will continue to be the basis of economic activity in WSEA, but business operations are evolving and it is critical that this is recognised in planning for the future growth and diversification of economic activity in western Sydney.

It should be noted that many high-tech industries (such as those required to support the growth of the WSEA) have operational requirements similar to commercial office uses. This is especially the case for high tech and multinational companies that colocate industrial operations with office based and specialised components of their business for reasons such as operational efficiency, cost reduction, and skills development achieved through connecting designers and technicians with manufacturing. To cater for these industries and facilitate the potential for an increase in employment density within the WSEA, a greater

diversity of uses and built form should be considered in the more established parts of the WSEA, where businesses are evolving from being almost entirely focused on warehousing and logistics to integrating a range of functions within a single site.

Jacfin has observed amongst its tenants a shift towards co-location of head office, warehousing and logistics, service, IT and some customer service functions (such as product customisation). There is also a drive to improve amenity and access to services and facilities to attract a denser and more diverse workforce to the WSEA in response to this more integrated business operational model. However, planning controls for the WSEA have not kept pace with the changing nature of businesses. Jacfin accordingly argues that, in areas that have matured beyond the initial phase of predominantly low employment density and lower capital investment value facilities, there is a need to re-consider planning controls to enable the ongoing maturation and diversification of employment related uses.

This maturation within the WSEA can continue without competing with the Aerotropolis vision or eroding the outcomes that are intended for the area. This is because the nature of uses that choose WSEA or the Aerotropolis will continue to be different. The Aerotropolis will be built on the foundations of a distinct vision built around a new airport, whereas the WSEA will continue to evolve through a more incremental diversification and expansion of the warehousing, logistics and related support services that have always underpinned WSEA's success.

The WSEA's role in supporting competitiveness

Genuine employment and innovation clusters require a diversity of land uses / businesses to compete globally. This is particularly important for creating supply chain efficiencies, partnerships that result in business and technology advancements, research and development, pharmaceuticals, specialised workforce training, and other avenues for building State and nationally significant employment areas.

Facilitating the development of these specialist clusters is highly important for competing with lower-cost manufacturers and producers in the global market. Within this context:

- Agglomeration economies will be highly important to facilitate the development of shared facilities and infrastructure, mature and strengthen supply chains, and develop a skilled labour force that caters for emerging economic specialisations. Within the WSEA context, warehousing and logistics will play an important role, but these are not the only industrial uses which can be accommodated. As we will discuss, there are also opportunities for accommodating multinational and high value companies that have multi-faceted business needs.
- Thought capital and innovation are essential in order to provide value-added production and services that distinguish Sydney-based businesses from lower-cost international competition. This relies on leveraging proficiencies in complex production, industry specialisations, and the development of new technologies or business approaches to meed rapid changes in consumer needs. This increasingly requires the integration of a range of business offerings, which have not traditionally been envisaged in industrial areas.

To illustrate, we note that the Sydney Science Park has received interest from major automotive industry innovators. Opportunities of this nature are important to capture, so that positively disruptive industry trends that affect economic stability are recognised and accommodated, and to leverage supply chain development.

Catering for multinationals and high value companies

Multinational and high-value companies frequently seek organisational efficiencies by co-locating operations. This includes major machinery manufacturers, innovative energy companies, battery storage, and technology leaders, who benefit from co-locating their headquarters / regional offices and ancillary / associated business arms with their industrial operations. Co-location results in direct costs savings through efficient land use. It also provides organisations the opportunity for office workers and technicians to be connected to the industrial / semi-industrial operations of the business, and eliminates the need for travel between business areas and industrial areas. While the draft Aerotropolis Plan appears to cater for these more integrated business operational models, the current planning framework in WSEA is stifling co-location, making it difficult for existing businesses to update their operations, and making WSEA less attractive for businesses looking to establish in western Sydney. As previously stated, our opinion is that the NSW Government can improve the flexibility of planning controls in WSEA to encourage co-location and to enable businesses to innovate diversify and improve efficiency, without detracting from planned outcomes in the Aerotropolis. The Aerotropolis Plan should acknowledge that WSEA's role can and will evolve through appropriate references to the current and emerging nature of businesses in WSEA. An evidence base is available that

¹ https://theurbandeveloper.com/articles/thinktank-meet-to-discuss-australias-5bn-smart-city

points to these emerging trends, and could be used to strengthen the case for the planned outcomes for the Aerotropolis and its relationship to WSEA.

Business costs structures

Cost structures are among the most significant influences affecting business viability, especially in the context of international competition. Many businesses are founded on the ability to access relatively low rents and land costs, which can be delivered in the WSEA more readily than what would be expected within the Aerotropolis precincts. We draw attention to this matter because there will be businesses that benefit from and complement the Aerotropolis' business ecosystem, but will have difficulty in locating within the Aerotropolis precincts due to cost sensitivity. These businesses may not require the lowest cost land / tenancies (which would be suited to warehousing and logistics), but are likely to require lower cost / tenancies in comparison to what is likely to be provided by Aerotropolis precincts that are closer to the airport.

This creates drivers to provide greater flexibility in land use planning for the WSEA, without setting aside the goal of WSEA primarily functioning as a warehouse and logistics precinct. This should be recognised at the strategic level for it to flow through to subsequent design and refinement of statutory frameworks.

Complementary and compatible uses

Successful employment areas are complex and multi-faceted in their land use and development mix. They function as 'ecosystems' that feature a range of businesses across the supply chain, enabling greater partnerships and collaboration, improving prospects for innovation and the development of more mature market sectors. They are also increasingly incorporating complementary uses such as gyms, child care centres, and suitably scaled activity centres / hubs (where appropriate). These uses play a role in enabling work-life balance and workforce retention, which are important to the ongoing success of employment areas. Planning for employment precincts in western Sydney must recognise the value of these related and ancillary uses to the success of the Aerotropolis and WSEA in attracting businesses and an increasingly skilled and sophisticated workforce, particularly for employees and business that are more 'footloose' and could choose to locate in other parts of Sydney, other Australian cities, or even other international locations.

Unanticipated opportunities

The investment in freight rail and major road infrastructure will enable closer connections to sea and air ports. This may bring new opportunities, especially as technologies and business needs evolve, and the nature of employment areas and workforce characteristics continue to change. Opportunity for unanticipated economic benefits should not be precluded. A planning framework that it outcome focused, and is an enabler of the right kinds of development rather than a regulatory instrument, will cater for those economic activities that we don't yet know of, but which may be crucial to an economically, socially and environmentally sustainable and resilient NSW and Australia.

Ongoing need for e-commerce and last-mile services

To remove any doubt, this submission does not argue that warehousing and logistics should be set aside as a defining feature of the WSEA. There are compelling reasons to pursue these uses to support e-commerce and last mile services, which enable business in earlier economic cycles to access their markets. Rather, Jacfin argues that this role should be augmented by supporting greater diversification for the reasons outlined in the submission.

5.0 Recommendations

Jacfin recommend that the following changes be made to the Western Sydney Aerotropolis Plan, on the basis of matters outlined in this submission.

Section 7.2.5 Mamre Road Precinct

Amend wording to reflect that warehousing and logistics provide a foundational role for the WSEA, but scope exists for
greater diversity. Specifically, we recommend the following changes to wording:

"The Mamre Road Precinct is part of the WSEA and will be connected to the potential Western Sydney Freight Line. Its proximity to the M4 Motorway and Elizabeth Drive as well as its generally flat terrain makes it suitable for large floor plate employment and logistics uses. The Mamre Road Precinct is largely affected by aircraft noise and those parts within the ANEC/ANEF 20 and above contours are not suitable for noise sensitive land uses. Therefore, the precinct will be centred on planned as an industrial warehousing and logistics precinct uses, working in conjunction with the wider WSEA. The precinct could also present potential opportunities for an intermodal terminal serviced by the potential Western Sydney Freight Line."

Section 7.3.5 Mamre Road Precinct - Strategic Outcomes

Amend wording which prohibits noises sensitive uses within the ANEC/ANEF 20 and above. This change is proposed
because it is possible to provide appropriate mitigation to support for commercial and office uses which can be located
in industrial areas, provided they are associated with the primary industrial use(s). Clarification is appropriate and the
following changes are recommended:

"Protect the 24-hour operation of the airport by enabling industrial uses and prohibiting noise sensitive uses only to locations outside the ANEC/ANEF 20 and above, unless they constitute ancillary or complementary uses that are associated with the primary use and appropriate mitigation is provided."

• After the fourth bullet point on zoning, insert a new strategic outcome to support complementary or compatible uses. It is recommended that wording be used, such as:

"Support complementary or compatible uses that do not detract from the function of a warehouse and logistics hub."

Section 7.3.5 Mamre Road Precinct – Implementation Strategies

- Amend wording in relation to land use conflict to identify how the conflict arises, in order to avoid any confusion regarding what constitutes conflicting uses. It is recommended that the following changes be made:
 - "Minimise potential for land use conflict by restricting incompatible land uses within ANEC/ANEF 20 and above contours, where the uses would undermine the 24-hour operation of the airport."
- Insert a new implementation strategy on complementary and compatible uses, with wording similar to the following:

"Consider complementary or compatible uses that work in conjunction with the logistics and warehouse functions of the Mamre Road Precinct."

6.0 Conclusion

This submission expresses Jacfin's support for the attention by all levels of government to planning and delivery of the airport and Aerotropolis. Good planning now will maximise the realisation of benefits to the economy and community of Western Sydney.

Planning for new employment and economic activity clusters in the Aerotropolis also reinforces the case for a rethink of the planning framework in WSEA to support its ongoing maturation. This can occur in parallel with and complementary to the development of the Aerotropolis.

Jacfin considers that planning for the WSEA is relevant to the Aerotropolis, as there are elements of the planning package that overwhelmingly focus on the role of WSEA as a warehousing and logistics hub. Notwithstanding the importance of these functions, there are also opportunities for diversifying WSEA's role, accommodating a greater range of uses which benefit from the State government's investment in infrastructure. Such uses are important to support to avoid creating a 'one-speed' hub in WSEA, which would miss the opportunity to create a more strategic employment cluster.

Jacfin recommends that minor changes be made to the Aerotropolis documentation, which do not detract from the Aerotropolis vision, but improve scope for further strategic policy development. Our vision is to create a more dynamic, diverse and activated mix of uses that maintain and increase the strategic role that WSEA plays within the Sydney, inter-state and international markets, working in concert with the Aerotropolis.

Jacfin also requests the opportunity to meet with the Western Sydney Partnership to discuss the content of this submission and commence a conversation on how Jacfin can work with government to deliver shared economic and employment objectives.

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

Yours sincerely,

Paul Robilliard

Director