

From:

[REDACTED]
Department of Planning and Environment

Sent:

Friday, 13 March 2020 11:21 AM

To:

[REDACTED]

Subject:

Webform submission from: [webform_submission:source-title]

Submitted on Fri, 06/03/2020 - 17:26

Submitted by: Anonymous

Submitted values are:

Submission Type: I am submitting on behalf of my organisation

First Name: Owen

Last Name: Walsh

Name Withheld: No

Email: [REDACTED]

Suburb/Town & Postcode: [REDACTED]

Submission file:

[western-sydney-airport-business-park---submission.pdf](#)

Submission: As per the attached submission. Regards, Owen

URL: https://pp.planningportal.nsw.gov.au/admin/structure/webform/manage/draft_plans_and_policies/submission/73236/resend

gray&walsh

URBIS

**SUBMISSION TO
WESTERN SYDNEY AEROTROPOLIS
PLANNING PACKAGE**

western sydney airport
business park 

25 February 2020

Mr. Andrew Jackson
Western Sydney Planning Partnership
PO Box 257
Parramatta NSW 2124

Dear Andrew,

SUBMISSION TO THE WESTERN SYDNEY AEROTROPOLIS PLANNING PACKAGE

OVERVIEW

This submission has been prepared by Gray & Walsh Pty Ltd the development managers of the planned Western Sydney Airport Business Park in consultation with our consultant Urbis Pty Ltd (**Urbis**), Cox and Reid Campbell in response to the public exhibition of the Western Sydney Aerotropolis Planning Package.

We have an interest in a landholding of approximately 67.2 hectares located at 2420 to 2430 The Northern Road and 140 Adams Road, Luddenham (**the site**). The site benefits from over 1.1 kilometre (km) of frontage of the soon to be completed The Northern Road. The property enjoys a strategic location between Elizabeth Drive, Adams Road, The Northern Road, and the Western Sydney International (Nancy-Bird Walton) Airport (**WSA**).

We thank you for the opportunity to make a submission and provide feedback on the draft Western Sydney Airport Planning Package (**WSAPP**). We would like to congratulate the Western Sydney Planning Partnership (**WSPP**), Department of Planning, Industry and Environment (**DPiE**), Greater Sydney Commission (**GSC**), Liverpool City Council (**LCC**), and all levels of government on establishing another significant milestone towards the bold vision to implement a new innovative and flexible planning framework to accelerate the development of the Western Sydney Aerotropolis (**the Aerotropolis**).

The WSAPP builds on the vision and objectives for the Aerotropolis outlined within the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan Stage 1 – Initial Precincts (**LUIIP**) and recognises the significant economic potential for Western Sydney.

We strongly support the WSPP in identifying the Agribusiness Precinct as a key initial precinct with significant potential to deliver employment as well as services that would support the airport and serve Greater Sydney's long-term food production distribution, trade, freight, logistics and industrial needs.

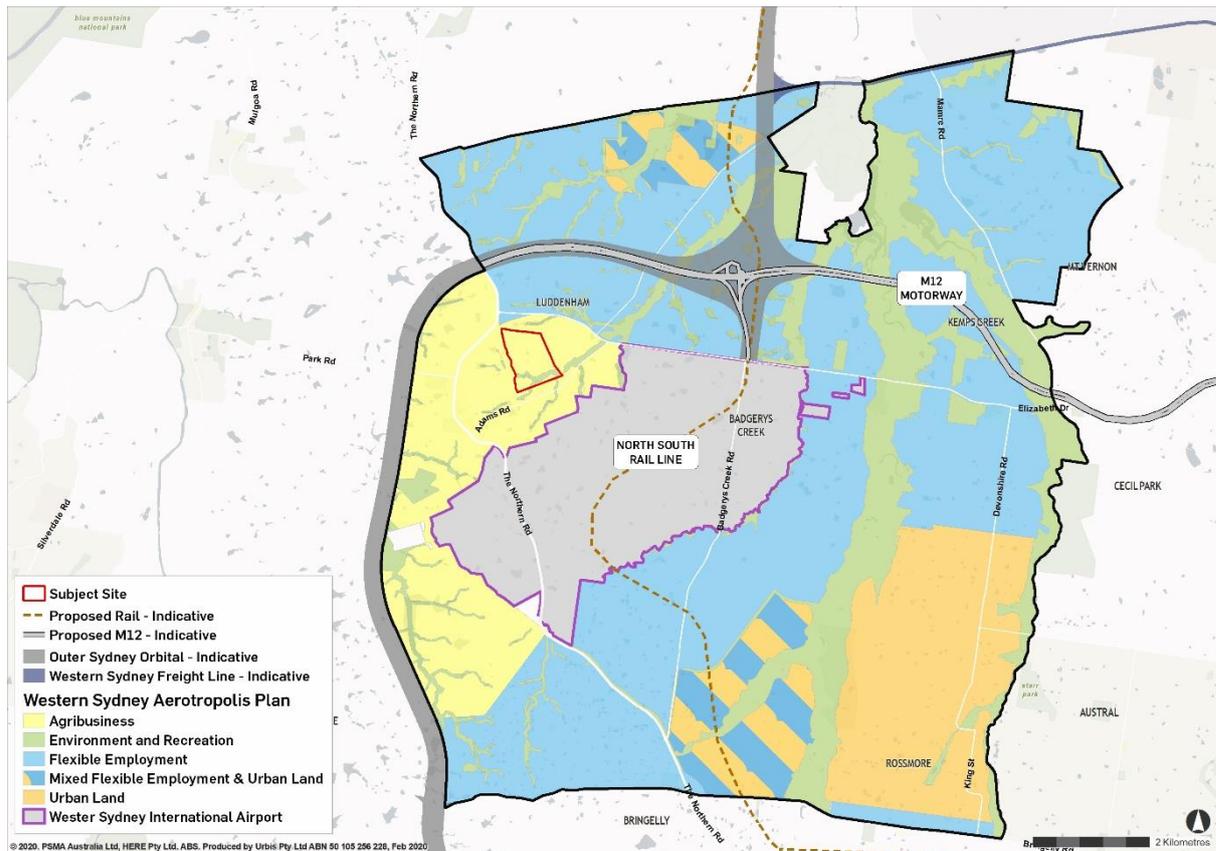
1. THE SITE

The Western Sydney Airport Business Park is a major landholding located at 2420 to 2430 The Northern Road and 140 Adams Road, Luddenham (the site). It is legally described as Lots 3 to 7 in DP 1240511. The location of the site is shown below in Figure 1.

The 67.2-hectare (ha) landholding has over 1.1km frontage to the new alignment of The Northern Road and has the benefit of a right of way to Adams Road. The site is located approximately 560m to the north-west of the future Western Sydney International Airport within the Agribusiness Precinct, initially identified within the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan Stage 1 – Initial Precincts (LUIIP) and the recently exhibited draft WSAPP.

The site is one of the largest landholdings within the Agribusiness Precinct. It is generally clear due to a history of grazing land uses and is currently occupied by a number of rural residential dwellings. The site is traversed by a contained catchment at the upper reaches of a tributary of Cosgroves Creek in the southern portion of the site. These attributes of the land and its physical location provide opportunity for the area to be accessed and serviced in an efficient staged manner that is in line with the WSAPP’s envisioned ‘Blue-Green-Grid’ to ensure that a meaningful open space network is provided within the Aerotropolis.

Figure 1 - The Site & WSAP Structure Plan



Source: Western Sydney Aerotropolis Plan 2019

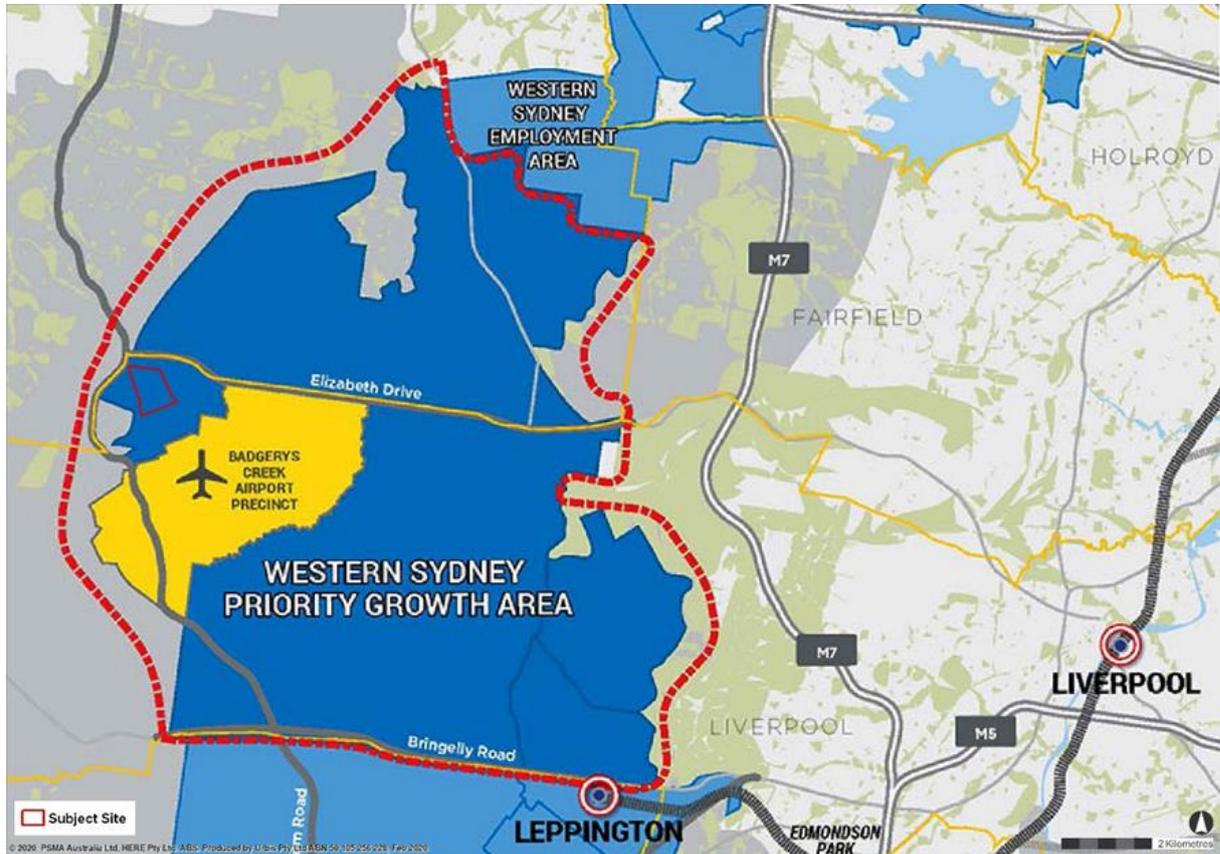
2. STRATEGIC PLANNING CONTEXT

The strategic planning context for the site can be summarised as follows:

- Under State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP), the site was identified for the purposes of “providing for development including major warehousing, distribution, freight transport, industrial, and high technology and research facilities.”
- In 2013, the NSW Government and the then Department of Planning & Infrastructure prepared a draft Structure Plan and vision for the Broader Western Sydney Employment Area (WSEA). The main employment sectors identified for WSEA in the short to medium term were transport, logistics and warehousing with increased opportunities for higher density employment, such as business parks, in the longer term. The site is located within WSEA and is identified as ‘employment land’.
- The Greater Sydney Regional Plan (A Metropolis for Three Cities) identifies a Metropolitan Rural Area within Greater Sydney with the intent to provide certainty and protection to agricultural industries by preventing inappropriately dispersed urban activities in rural areas. The site is not identified as being within the Metropolitan Rural Area.
- The Western Sydney District Plan sets out the planning priorities and actions for Western Sydney. The site is included in the area identified as ‘Land Release Area’ and ‘Potential Future Industrial/Employment Land.’ The site is located within the western economic corridor, which has the intent to facilitate “job growth leveraging the investment in infrastructure and new communities”.

Historically the site has been identified as future employment land or urban land. The draft LUIIP Stage 1 is the first strategic planning document to propose to zone the site and the broader area as agribusiness.

Figure 2 – The Site and the Western Sydney Priority Growth Area



Source: Department of Planning, Industry and Environment

3. WESTERN SYDNEY AIRPORT BUSINESS PARK

Adjoining the entry side of the new Western Sydney Airport and benefiting from over 1.1 km of frontage to the soon to be completed The Northern Road, Western Sydney Airport Business Park is strategically located between Elizabeth Drive, Adams Road and The Northern Road in Western Sydney.

The Western Sydney Airport Business Park (www.westernsydneyairportbusinesspark.com.au) is managed by the Development Management team who are delivering the largest employment area within the Sydney's North West Growth Area, the \$2.9 billion Sydney Business Park (www.sydneybusinesspark.com.au).

Our team is preparing structure and precinct planning layouts to accommodate proposed uses including Business Premises, Distribution Centres, Food and Drink Premises, Freight and Logistics, Light Industry, and Warehousing. Our aim is to build a world class business park that will attract the very best businesses from around the world and would include superior telecommunications and infrastructure provisions, high quality landscaping, a range of amenities and integrated green technology.

We are already in discussions with a number of tenants regarding their property requirements and desire to locate within the Western Sydney Airport Business Park to support and grow with the Western Sydney Airport opening. The preliminary conceptual master plan is in Appendix A.

4. SUBMISSION ON WSAPP

Western Sydney Airport Business Park welcomes the opportunity to comment on the WSAPP. We commend the WSPP, LCC and all levels of Government on achieving another significant milestone in its work on setting the planning framework for the Aerotropolis and the WSPP's ongoing commitment to the rezoning of initial precincts of the Aerotropolis by the end of 2020.

We have reviewed the package and have identified a number of key matters which we consider should be addressed prior to finalising the exhibited documents in order to ensure that ultimately the development potential of the site can be maximised consistent with the strategic objectives of the Agribusiness Precinct, and an effective and holistic approach is taken to land use planning to ensure the greatest strategic outcomes for the wider Aerotropolis and the Western Parklands City.

4.1. RECONSIDER THE SITE FOR ENTERPRISE ZONE

As proposed under the WSAPP Draft SEPP Mapping, an Agribusiness Zone will apply to a majority of the site. A portion of land in the site's south – within the Cosgroves Creek catchment – has been identified as 'Environment and Recreation Zone'. This is consistent with the envisioned 'Blue-Green-Grid'.

Figure 3 - Draft WSAPP Zoning Map

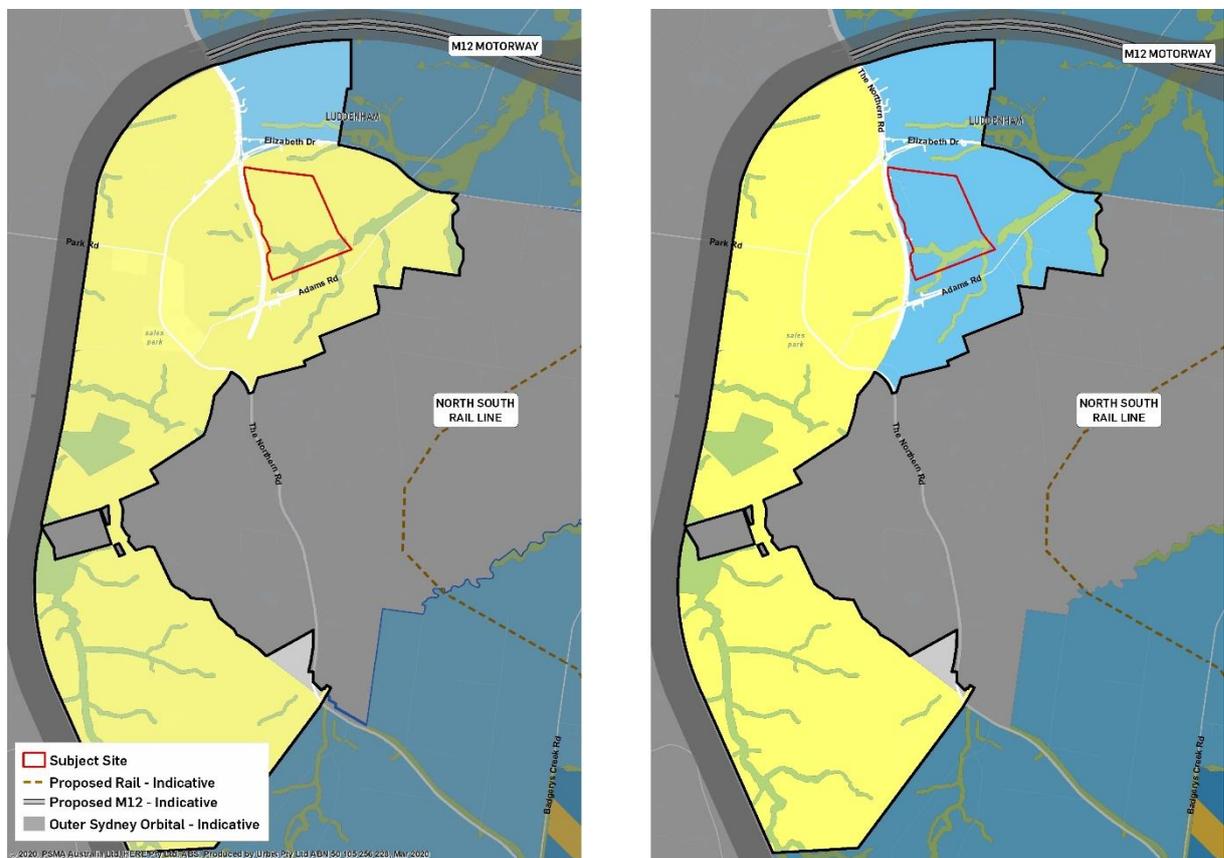


Source: Western Sydney Aerotropolis Plan 2019h

As an alternative to the Agribusiness Zone we consider that a better planning outcome can be achieved if there is an adjustment of the zoning boundary of the land to the east of the realigned The Northern Road from Agribusiness to Enterprise Zone (See Figure 4). This is not inconsistent with the vision for the Agribusiness Precinct or intent of the Enterprise Zone. We believe the site is strategically placed and presents a real opportunity for government to maximise its return on investment in infrastructure.

By zoning the site for Enterprise, it will enable a transition from agribusiness to a range of commercial uses, similar to the northernmost portion of the Agribusiness Precinct (directly north of Elizabeth Drive) which is identified as Enterprise zone in the WSAP Structure Plan.

Figure 4 - WSAP Structure Plan – Agribusiness Precinct and Proposed Zone Change



Agribusiness Precinct Structure Plan

Proposed Expansion of the Enterprise Zone within the Agribusiness Precinct

Source: Western Sydney Aerotropolis Plan 2019

Designating the site within an Enterprise Zone would be the best outcome for the following reasons:

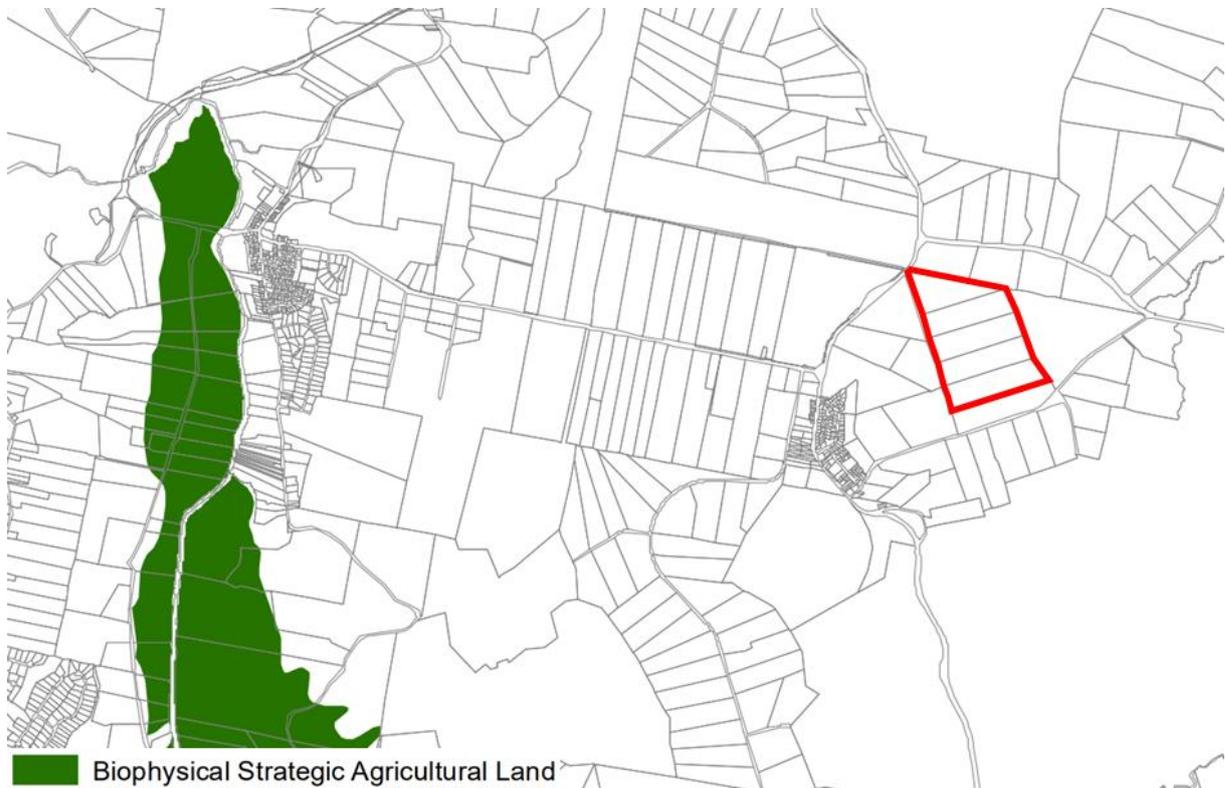
- Access - To enable the site to take advantage of its key location fronting the newly upgraded The Northern Road and provide opportunities for early investment in and establishment of employment

generating land uses consistent with the overall objectives of the Aerotropolis and supporting the future operations of the Western Sydney Airport.

The Northern Road transport corridor provides efficient access to the broader state road network including the M12 and M9 motorways. Access to The Northern Road is facilitated by the current planned and committed upgrades of Adams Road and intersection treatments onto The Northern Road. Opportunities for access through the proposed Anton Road Link Extension to the Airport land side and road structure improvements such as those suggested in the draft structure plan (by realigning the intersection of Adams Road and Luddenham Road where they currently intersect Elizabeth Drive) would complete an efficient and robust road structure plan;

- Employment Density - Proximity to the airport, significant infrastructure spending in the vicinity of the precinct and exposure facilitate significant interest from airport support service industries which maximise employment density;
- Exposure - Significant exposure to The Northern Road will attract blue chip employers to this area seeking to be recognised in this precinct. Intensive activity as exemplified by growth adjacent to Richmond Road, Windsor Road and Camden Valley Way upgrades reinforce this opportunity;
- The expected loading area for commercial, agribusiness will be via a proposed 'agriport,' to be established within the precinct southwest of the airport, providing for the movement and storage of agricultural commodities through an innovative multi-modal supply chain. Whilst this is supported, the site's location and lack of the agriport's connectivity to major roads means that the use of the subject site as Agribusiness may not be the most effective in terms of land usage due to accessibility
- Development Constraints - Previous studies undertaken by Council and the State have found this area to be free of significant development constraints such as endangered vegetation or fauna communities, flooding, heritage-listed items and bushfire risks.
- Within the land zoned for agribusiness, the site is farthest from areas mapped as Biophysical strategic agricultural land (BSAL) in the State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) - Biophysical Strategic Agricultural Land Mapping. BSAL is land with a "rare combination of natural resources highly suitable for agriculture". It has the best quality landforms, soil and water resources which are capable of sustaining high levels of productivity and require minimal management practices to maintain this high quality.

Figure 5 - SEPP 2007 – Strategic Agricultural Land Map



Source: NSW DPIE

- Further to the above, prior to the site's proposed rezoning under the Draft Aerotropolis SEPP, the land has historically been specified as designated land under the SEPP (Western Sydney Employment Area) 2009 (WSEA SEPP). Identified within Precinct 11 of the WSEA SEPP – the Broader Western Sydney Employment Area – the land has strategically been selected and strategically planned for the economic development and the creation of employment in the WSEA by providing for development including major warehousing, distribution, freight transport, industrial, high technology and research facilities. These land uses align with permitted land uses under the Enterprise Zone, rather than that of the Agribusiness Zone.
- The DCP outlines a vision statement for the Agribusiness Precinct which states that 'the precinct will maintain a landscape-led approach to development, building on the existing topography and natural features in the design of the precinct.' The site lies within the Oaky / Cosgroves Creek catchment (South Creek Sub-Catchment) which is the same catchment that includes the Enterprise Zone in the Northern Gateway Precinct. Land use planning based on water catchments facilitates holistic considerations that define land parcels on ecological grounds and provides a planning basis for the protection and enhancement of water quality, water-related ecosystems and efficient use of resources.
- Majority of the site, approximately 47.5 hectares, is outside the Australian Noise Exposure Concept 20 contour. The site can therefore accommodate potential noise sensitive land uses.

4.2. ALTERNATIVE OBJECTIVE FOR THE AGRIBUSINESS ZONE

Western Sydney Airport Business Park supports the planning for the Agribusiness Precinct, which has been identified as a priority precinct that has significant potential to establish world class agribusiness facilities and value-added industries such as freight and logistics. However, we are concerned that there is inconsistency between the objectives for the zone and the range of permissible land uses and the role the precinct is to play.

We suggest that to ensure that the overall objectives of the WSAPP and the Agribusiness Precinct can be attained, a review of the Agribusiness Zone objective: *‘To maintain and enhance natural rural character, biodiversity and sustainability of the area’* be reviewed. This objective would preclude the development of land in the precinct for agribusiness purposes as the range of permissible land uses by their nature will require alteration of landforms which will result in a change in natural character of the land and consequently parts of the precinct. A review of the zone objectives for the Agribusiness Precinct will not impact on the retention of productive agricultural land in the precinct.

The site is surrounded by major roads, the Western Sydney Airport, industrial and employment land. Attempts to maintain the natural rural character of the site and large parts of the precinct could potentially put at risk the delivery of intended land uses for the precinct outlined in the WSAPP.

We propose the following objective instead: *“To ensure that land which has the potential to impact environmental conservation areas is developed appropriately and does not detract from the biodiversity outcomes for the Precinct.”*

Table 1 – Proposed Updated to Agribusiness Zone

Objectives
<ul style="list-style-type: none"> • To encourage sustainable and high technology Agribusiness and Agricultural production with links to food production and processing. • To encourage diversity in Agricultural and Agribusiness enterprises and systems appropriate for the area. • To encourage the development of integrated food and supply chain related industries. • To minimise conflict between land uses within this zone and land uses within adjoining zones. • To ensure that land which has the potential to impact environmental conservation areas is developed appropriately and does not detract from the biodiversity outcomes for the Precinct. • To allow for non-agricultural land uses that will not restrict the use of other land in the locality for agricultural purposes. • To allow for the sustainable and holistic development of agritourism product and experiences. • To protect the operations of the Airport, including 24-hour operations, and provide appropriate protections for the community.

Objectives

- Ensure there are no sensitive land uses (such as residential, aged care, early education and childcare, educational establishments and hospitals amongst other uses) located within the ANEC 20 and above contours.
- Ensure that land uses up to the ANEC 20 contour are subject to appropriate design and construction standards to reduce any potential for airport noise impacts.

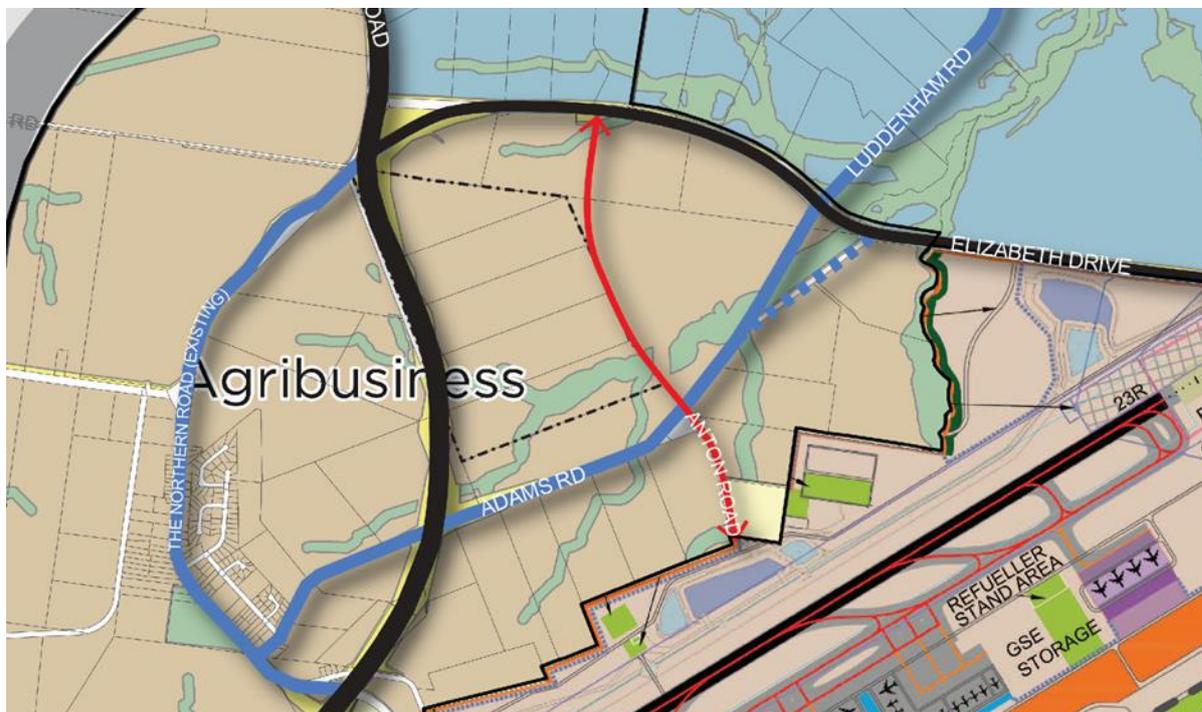
4.3. OPPORTUNITY TO DELIVER SERVICE ACCESS INTO THE WESTERN SYDNEY AIRPORT

The site enjoys over 1.1 km of direct frontage to The Northern Road and has a preserved access to this transport corridor. It also has a right-of-way across to Adams Road from the southern portion of the site.

There are opportunities to align Adams Road and Luddenham Road intersections and to provide a sub-arterial connection along the alignment of the Proposed Anton Road Link Extension. We propose a new road that can be delivered within the site for infrastructure including transport, water, drainage and other servicing needs to support the operations of the Airport (refer to Figure 6).

To support the success of the Airport we propose an extension of Adams Road in a northern direction to intersect with Luddenham Road to support a continuous connectivity with the Elizabeth Drive from the southern part of the Agribusiness Precinct. Similarly, within the exhibited Western Sydney Airport Environmental Impact Statement (EIS), several references were made regarding the upgrade of Anton Road, which runs along the eastern border of the site as an imperative north to south connection between the Airport and Elizabeth Drive. The EIS made several references to the importance of Anton Road as it would act as airside access to airport support facilities, including being the anticipated primary access point for deliveries of fuel by road tanker, and will be required to be of a suitable standard to accommodate B-double vehicles. By way of noting the importance of Anton Road as the primary connection for emergency access and connection to the local road network, the details of its likely upgrades require further clarity which was not been provided within the WSAPP.

Figure 6 – WSA Business Park Proposed Structure Plan



Source: Cox Architecture

In order to guarantee substantial and upgraded access, it is appropriate that all intended extended or upgraded roads be identified on the WSA Structure Plan. This includes any proposed upgrades to the alignment of Adams, Luddenham and the proposed Anton Road Link Extension, as well as upgrades to the Northern Road. The inclusion of the future roads on a structure plan or the addition of an Indicative Layout Plan is critical as it provides landowners with certainty as to the development status of land, as well as allowing them to make informed decision in relation to land use planning. By ensuring that information pertaining to indicative road alignments is readily available, the WSPP is highlighting its support that land use planning outcomes within the Agribusiness Precinct and wider Aerotropolis are prioritised and that planning for development is able to be well integrated in a manner that supports future connectivity and development.

4.4. TIMING AND DELIVERY OF INITIAL PRECINCTS

Notwithstanding our request for alternative zoning of the site to Enterprise Zone, we support the fact that the Agribusiness Precinct is one of the six initial precincts identified of the 10 precincts in the Aerotropolis. The planning and delivery of this precinct and the Western Sydney Airport Business Park's landholding is significant given its location along the Northern Road upgrade, connectivity to Elizabeth Drive and Adams Road, and proximity to the airport.

Western Sydney Airport Business Park strongly supports the Planning Partnership's identification of the Agribusiness Precinct as an initial precinct and major interface with the new WSA. Western Sydney Airport Business Park are committed to working with the WSPP and DPIE on the delivery of Airport-compatible uses which contribute to the vision of the Western Parkland City. The site is readily able to be developed and we are engaging with businesses about locating within the site as soon as we are given the opportunity.

We support the timeframes for the initial precincts and are committed to collaborating with the WSPP to achieve:

- Rezoning of the initial precincts by mid-2020;
- Exhibiting the draft precinct plan for the Agribusiness Precinct by mid-2020; and
- Finalisation of the precinct plan by late 2020.

SUMMARY

We look forward to the implementation of this exciting new planning framework for the Western Sydney Aerotropolis and we welcome the opportunity to contribute and collaborate further to its implementation to ensure the success of the Aerotropolis.

Western Sydney Airport Business Park proposes that the WSPP adopt the following:

- Reconsider the zoning of the site for Enterprise Zone while maintaining it in the Agribusiness Precinct.
- An alternative objective for the Agribusiness Zone in the Proposed SEPP: *“To ensure that land which has the potential to impact environmental conservation areas is developed appropriately and does not detract from the biodiversity outcomes for the Precinct.”*
- Deliver the Proposed Anton Road Link Extension within the site for infrastructure including transport, water, drainage and other servicing needs to support the operations of the Western Sydney Airport.
- Continued endorsement of the Agribusiness Precinct as an initial precinct and delivering on the proposed timeframes of rezoning and exhibiting the draft precinct plan by mid-2020 and finalisation of the Agribusiness Precinct Plan by late 2020.

If you have any questions, please do not hesitate to contact Owen Walsh on [REDACTED] or [REDACTED] or Clare Brown, Director of Urbis at [REDACTED].

Yours sincerely,



Owen Walsh
Director, Gray & Walsh



Clare Brown
Director, Urbis

APPENDIX A

**PRELIMINARY CONCEPT MASTER
PLAN**

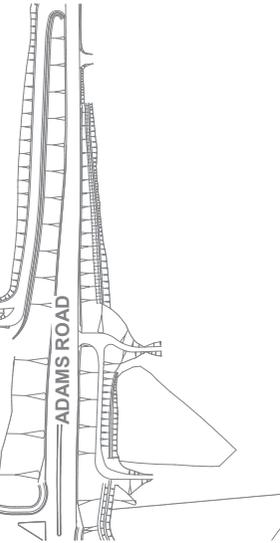


DEVELOPMENT AREA SCHEDULE	
SITE AREA (APPROX - PAP AND ANTON ROAD ADJUSTMENTS)	668,066 m ²
ENVIRONMENT AND RECREATION ZONE AREA	69,642 m ²
ON-SITE DETENTION BASINS	6,490 m ²
ROAD AREAS (TOTAL)	39,700 m ²
NET DEVELOPABLE AREA	552,234 m²
BUILDING AREAS	
INDUSTRIAL BUILDINGS	308,800 m ²
OFFICE	17,600 m ²
BUSINESS, FOOD & DRINK PREMISES AND OFFICE	4,600 m ²
TOTAL BUILDING AREA	331,000 m²
CAR PARKING PROVIDED	2,027 SPACES

LEGEND	
	INDUSTRIAL BUILDINGS
	OFFICE
	LANDSCAPE
	LIGHT DUTY PAVEMENT
	HEAVY DUTY PAVEMENT
	BUSINESS, FOOD & DRINK PREMISES AND OFFICE
	PEDESTRIAN PATH/CYCLEWAY
	OUTDOOR BREAK AREA
	ENVIRONMENT AND RECREATION ZONE
	CREEK
	ON-SITE DETENTION
	SPRINKLER TANK/PUMP ROOM

PRECINCT SIGNAGE/BILLBOARD
PROVISION FOR OSD - SHOWN HATCHED
APPROXIMATE NEW SITE BOUNDARY PER THE NORTHERN ROAD PROPERTY ADJUSTMENT PLAN
EXISTING LOT BOUNDARY (BLUE DASH)

PROVISION FOR OSD - SHOWN HATCHED
POSSIBLE BUSINESS/FOOD & DRINK PREMISES - 2,600 m²
POSSIBLE BUSINESS/FOOD & DRINK PREMISES - 2,000 m²
INDICATIVE EXTENT OF ENVIRONMENT AND RECREATION ZONE (DRAFT WSA SEPP MAP - 2019)
ESTATE SHARED RECREATIONAL AREA
APPROXIMATE LINE OF CREEK
PROVISION FOR OSD - SHOWN HATCHED



NOTE:
DO NOT SCALE OFF THIS DRAWING.
ALL AREAS AND DIMENSIONS ARE APPROXIMATE ONLY AND SUBJECT TO SURVEY.

APPENDIX B

ARTIST'S IMPRESSION OF THE WESTERN SYDNEY AIRPORT AND THE WESTERN SYDNEY AIRPORT BUSINESS PARK



NOTE:
DO NOT SCALE OFF THIS DRAWING.
ALL AREAS AND DIMENSIONS ARE APPROXIMATE
ONLY AND SUBJECT TO SURVEY.