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Submitted on Mon, 09/03/2020 - 10:53  
Submitted by: admin  
Submitted values are:  
Submission Type:I am submitting on behalf of my organisation  
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Suburb/Town & Postcode: Badgerys Creek  
Submission file:  
[submission---planning-ingenuity---badgerys-creek-road.pdf](#)

Submission: Please see attached

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

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[REDACTED]

27 February 2020

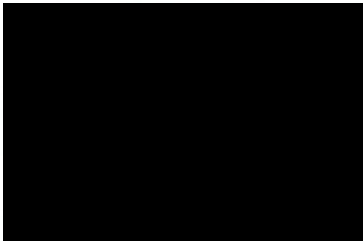
Western Sydney Planning Partnership  
PO Box 257  
PARRAMATTA NSW 2124

**SUBMISSION IN RELATION TO WESTERN SYDNEY AEROTROPOLIS PLANNING PACKAGE  
ON BEHALF OF PROPERTIES ON [REDACTED] BRINGELLY**

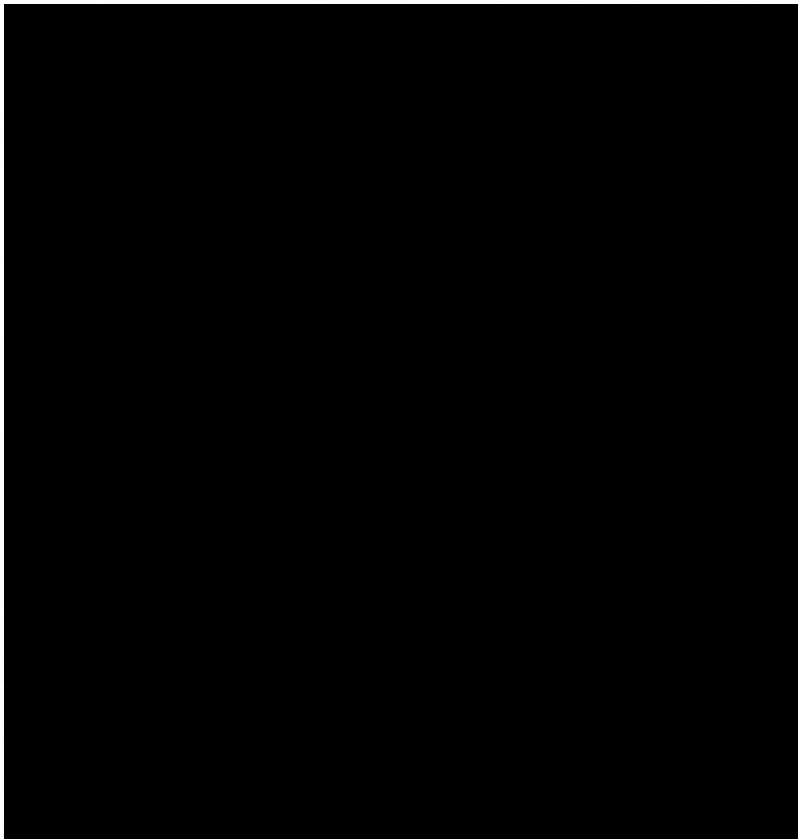
**1. INTRODUCTION**

We act as town planning consultants and represent a group of landowners who own properties on Badgerys Creek Road, Bringelly, within the proposed "Aerotropolis Core" of the Western Sydney Aerotropolis. The properties are located at:

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The approximate location of these properties within the Western Sydney Aerotropolis is shown in Figure 1.



**Figure 1** Approximate location within the Aerotropolis of properties on behalf of which this submission is made (shown by star)



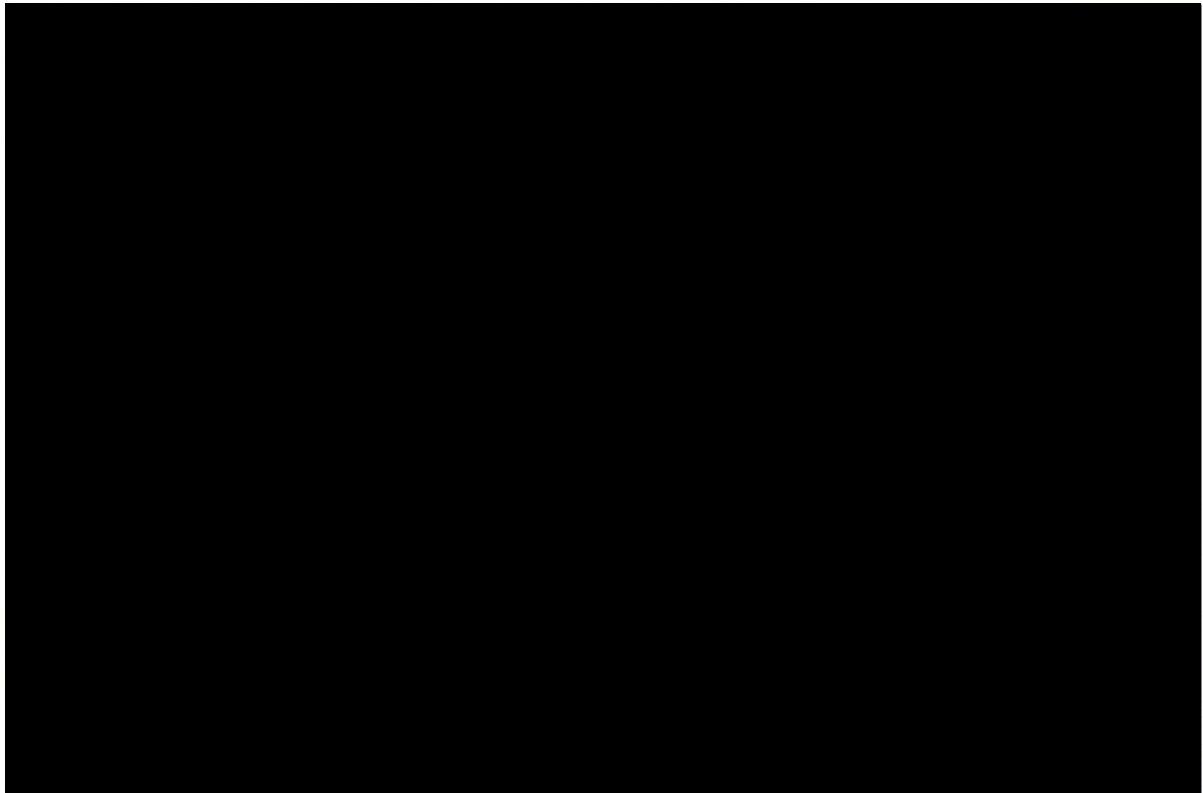
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The site, which includes seven (7) properties (as identified above), is a significant landholding of approximately 20.5ha in size with street frontage of approximately 670m, located on the western side of Badgerys Creek Road, as shown in Figure 2.



**Figure 2** Location of properties on behalf of which this submission is made (outlined red)

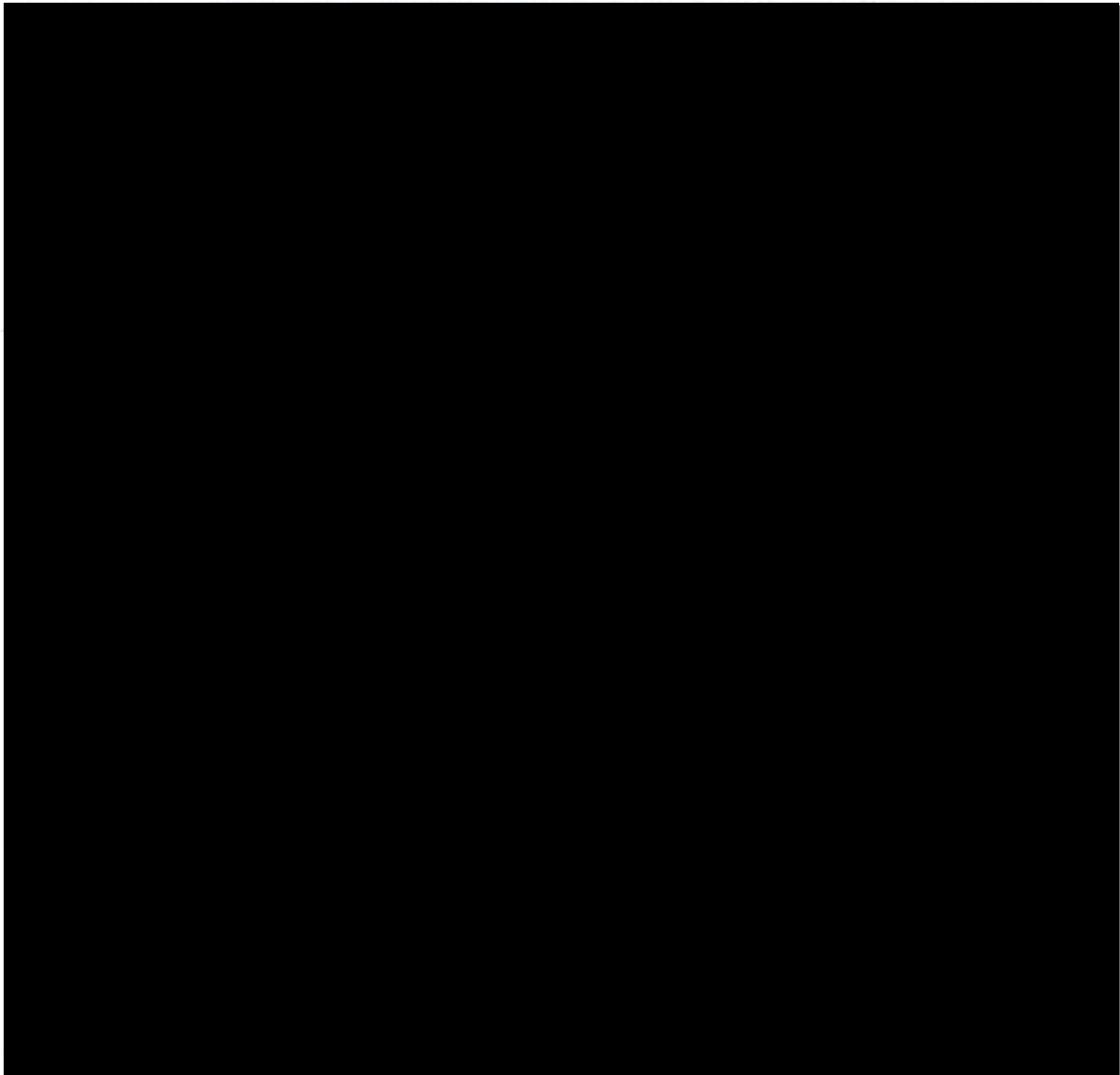
We have been instructed to make a submission in relation to the draft planning documents for the Western Sydney Aerotropolis which are on public exhibition until 28 February 2020 – namely, the *Draft Western Sydney Aerotropolis Plan*, the *Western Sydney Aerotropolis Discussion Paper on the proposed State Environmental Planning Policy*, and the *Draft Western Sydney Aerotropolis Development Control Plan Phase 1*.

Specifically, the landowners wish to address the Regional Parkland Investigation Area that is shown to affect their land.

## **2. THE SITE WITHIN THE DRAFT PLANS**

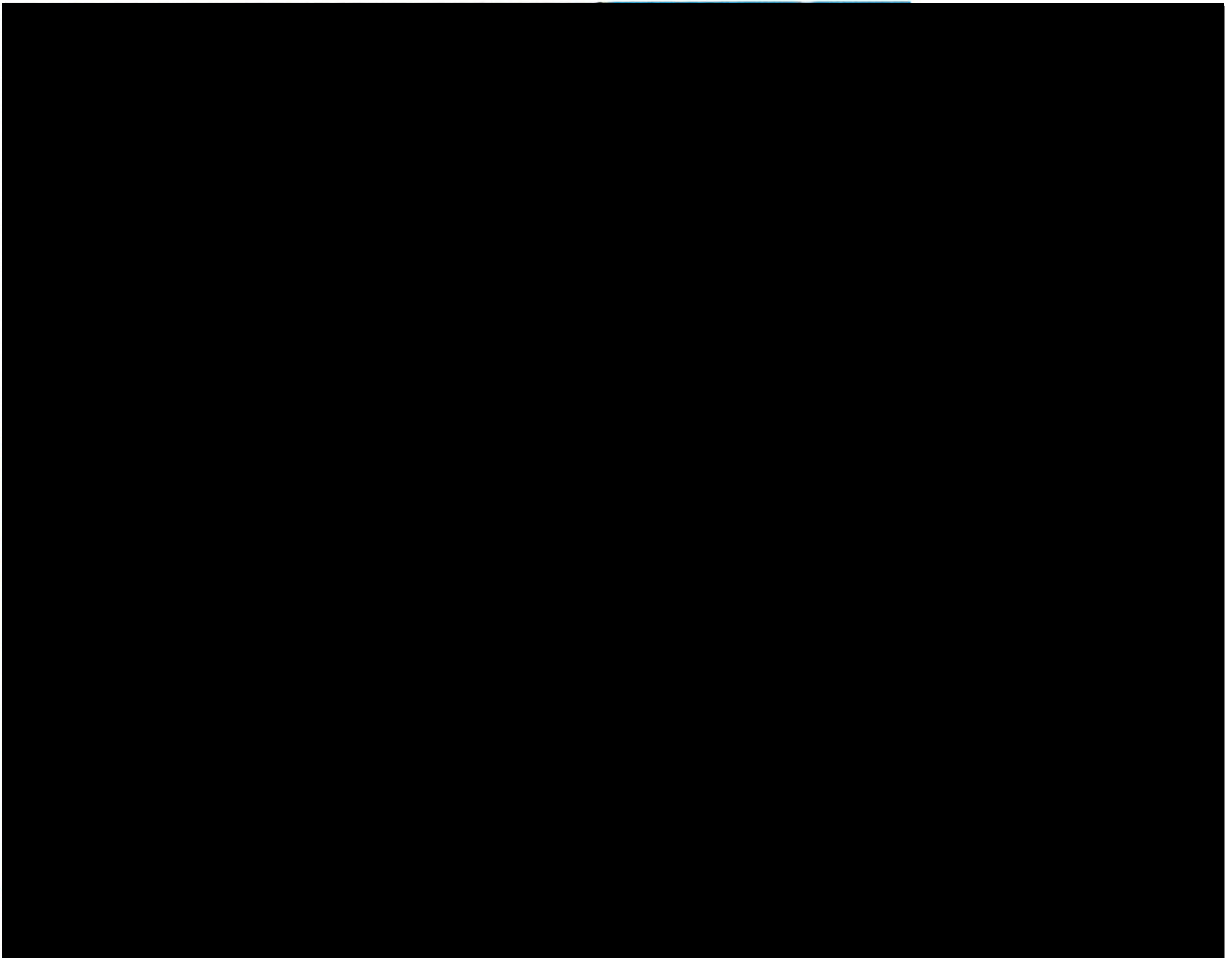
The *Draft Western Sydney Aerotropolis Plan* identifies 10 precincts based on opportunities and constraints, as well as likely future character and connectivity. The subject properties are within the "Aerotropolis Core" precinct which is intended to be a high order employment-focused metropolitan centre. The Aerotropolis Core will greatly contribute to the Western Sydney Economic Corridor and forms part of the Metropolitan Cluster as identified in the Western City District Plan. The "Aerotropolis Core" precinct is one of the six (6) initial precincts to be planned and delivered.

The proposed zoning for our clients' properties is "Enterprise" as illustrated in Figure 3. The *Western Sydney Aerotropolis Discussion Paper on the proposed State Environmental Planning Policy* outlines that the intent of the Enterprise zone is to permit land uses complementing the functions of the city and the Airport as a 24 hour transport hub. The zone will enable uses typically associated with employment lands, supporting a range of commercial and industrial sectors that have synergies with the Airport. Residential accommodation will not be permissible within the Enterprise zone.



**Figure 3** Proposed zoning across the Aerotropolis, submitters properties within an "Enterprise" zone (site shown by star)

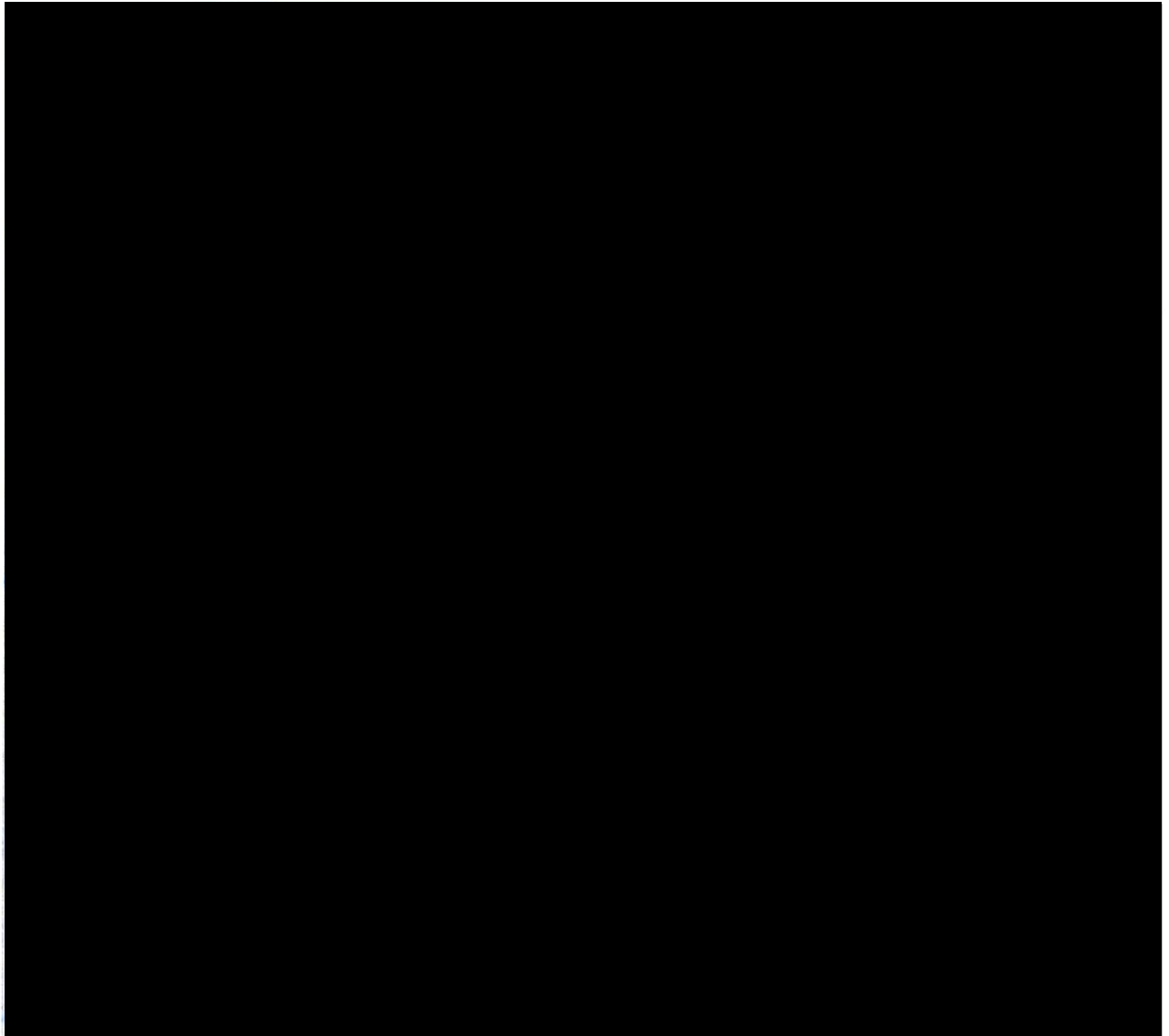
The Aerotropolis Core Structure Plan identifies our clients' properties as within a "Flexible Employment" area, as shown in Figure 4. The Structure Plan also highlights a broad area for investigation as Regional Parkland, which encompasses our clients' properties.



**Figure 4** Approximate location of properties in relation to the Aerotropolis Core Structure Plan (shown by star)

The *Draft Western Sydney Aerotropolis Plan* sets out a "Blue-Green Grid" i.e. the network of blue and green spaces including waterways, riparian areas, bushland, parks and open spaces, tree canopy and private gardens. Two regional park investigation areas are identified in the north and south of the Aerotropolis along the Wianamatta-South Creek corridor. The subject properties are within the broad area identified for investigation for the southern regional park, which is described as follows:

*"The southern regional park will connect the environmental setting of the Wianamatta-South Creek corridor to urban areas in the Aerotropolis Core."*



**Figure 5** Approximate location of properties in relation to the Blue Green Infrastructure plan (shown by star)

### **3. SUBMISSION OF ISSUE(S)**

In general, our clients are in support of the scheme for the Aerotropolis and in particular the planning for the Aerotropolis Core precinct in which their properties are located, subject to the more detailed precinct plan which are anticipated to be on exhibition by mid-2020.

However, our clients have concerns regarding the location of their properties within the Regional Parkland (Investigation) area of the Aerotropolis Core, which they consider would be better located elsewhere within the Precinct, as outlined below.

#### **3.1. Regional Parkland (Investigation) Area**

The approach of the *Western Sydney Aerotropolis Plan* (WSAP) to follow a 'landscape-led' planning approach is supported. As outlined in the WSAP, the Wianamatta-South Creek green spine is the focus of the "blue-green network" and the intention of the southern regional park is to connect the Creek to urban areas in the Aerotropolis Core. Our

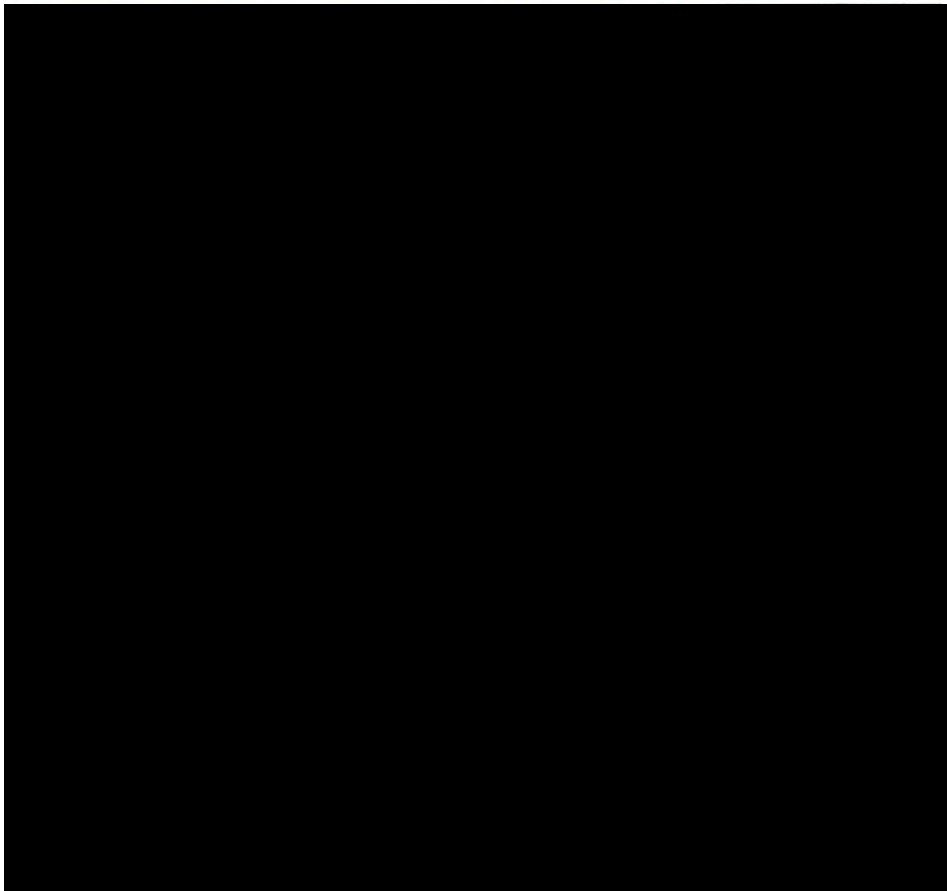


clients agree that the Creek is an important resource which should be preserved, enhanced and made accessible particularly to future residents of the area.

Our client's properties are located within the area identified for investigation for a southern regional park. It is noted at this stage of planning that the investigation area is very broad, and that the potential and/or location of the parkland elements will be determined during future detailed precinct planning.

On behalf of our clients, we submit that the southern regional park is best located in the east/south-east of the Aerotropolis Core precinct, and should be confined within the area zoned as "Mixed Use" rather than in the area of land to the west of Badgerys Creek Road. The primary reasons for this position are as follows (illustrated in Figure 6 and elaborated on in detail below):

- Residential uses are not permitted in the Enterprise zone to the west of Badgerys Creek Road, and the park should be in proximity to residential uses (Point (1) in Figure 6);
- Badgerys Creek Road provides a link into the operational airport and signals the zone boundary between Mixed Use to the east and Enterprise to the right and is appropriate for commercial/industrial development with synergies to the Airport (as per the intent of the Enterprise zone) (Point (2) in Figure 6);
- Badgerys Creek Road is a natural existing barrier, with the Park appropriately confined to the east of the road (Point (3) in Figure 6);
- The park should be as far from the operational airport to the north-west and away from the 3km wildlife buffer zone (Point (4) in Figure 6); and
- The park should be in proximity to Wianamatta-South Creek in the east of the Precinct (Point (5) in Figure 6).



**Figure 6** Recommendation for Regional Parkland Investigation Area to be located in east / south-east of the Precinct

### Proximity to Residential Development

Key open space areas should be in proximity to residential development to provide improved amenity and liveability outcomes. The “common implementation strategies” of the WSAP (Section 7.1.2) include to plan for an increase in the proportion of homes within a 10-minute walk of quality public green and open space.

Residential development will not be permitted in the Enterprise zone, and is rather to be allowed for in the Mixed Use zone in the south-east of the precinct. One reason for this is to allow for residential use on land not affected by the ANEC/ANEF 20 and above contours associated with the operational airport located north-west of the precinct, and to focus residential communities within 800 metres or a 10-minute walk of the Metro station.

With the potential to accommodate 20,000 - 24,000 residents in the Aerotropolis Core, ensuring ease of access to open space is of prime importance in considering the appropriate location of the southern regional park.

With residential development not permitted in the Enterprise zone, it is not logical to provide a key area of open space within this zone. Therefore, the southern regional park should be confined within the Mixed Use zone where residential development is to be permitted.

It is noted that linear parks are proposed to be incorporated throughout the Precinct which will allow for open space to be accessible to workers in the Enterprise zone.

### Badgerys Creek Road

Given that Badgerys Creek Road will be a feeder road into the operational airport site and signals the zone boundary between Mixed Use to the east and Enterprise to the west, it would be appropriate for properties to the west of Badgerys Creek Road to signal the change in land use and provide for commercial/industrial development in accordance with the intent of the Enterprise zone which is to permit land uses complementing the functions of the city and the Airport as a 24 hour transport hub with uses that have synergies with the Airport.

The Aerotropolis Core precinct is envisaged to deliver 50,000 – 60,000 jobs, leveraging the positive economic impact of the adjacent airport and creating Greater Sydney's next global gateway. As such, it is important that the Enterprise zone be enabled to deliver the necessary commercial/industrial development to support this vision. The land owned by our clients is in an appropriate position for such land uses.

Further, Badgerys Creek Road is an existing physical barrier or boundary which would logically restrict the extent of the regional park i.e. to contain the park within the area to the east of the road. It is also logical to restrict the regional park to the east of Badgerys Creek Road given the zoning to the east of Badgerys Creek Road is Mixed Use and to the west is Enterprise.

Further, given the size of the precinct at approximately 1,382ha there is a considerable area to the east of Badgerys Creek Road to accommodate a sizeable regional park without the need to extend over Badgerys Creek Road to the west.

### Wildlife Buffer Zone

Another reason to provide the southern regional park towards the east/south-east of the precinct is to reduce the potential for wildlife strike. As shown in Figure 7, the 3km wildlife buffer zone falls roughly in the middle of the Aerotropolis Core precinct. Locating the open space as far towards the south-east, away from the operational airport, would assist with minimising the potential for wildlife strike associated with the operational airport.

The WSAP recognises the benefits of a Blue-Green Grid to provide improved amenity and liveability outcomes, whilst also recognising the “need to limit wildlife attraction within the vicinity of the Airport” (Section 7.2.3 of the WSAP). The WSAP recognises that the potential for wildlife strike will influence the location of parks, and this will be addressed in precinct planning.



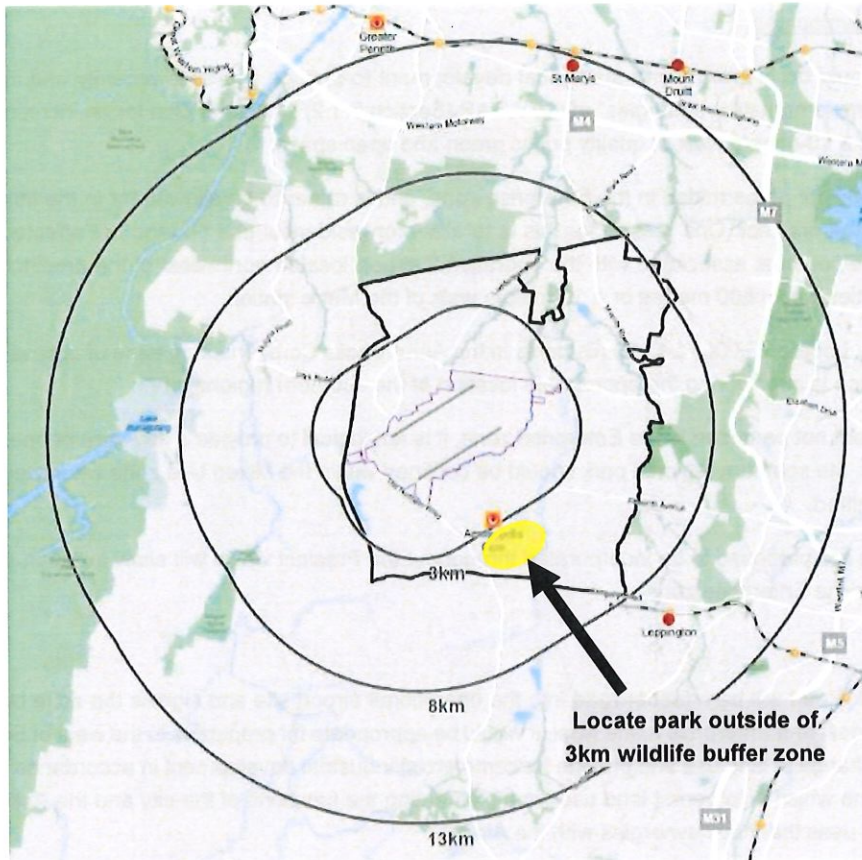


Figure 7 Wildlife Buffer Zone map (Source: Western Sydney Aerotropolis Plan)

#### Proximity to Wianamatta-South Creek

As outlined in the WSAP, the Wianamatta-South Creek green spine is the focus of the "blue-green network". It is noted that the intention of the southern regional park is to connect the Creek to urban areas in the Aerotropolis Core, and that the overarching purpose of the southern regional park is to *"protect and improve the ecology of the northern regional park through the restoration of the creek and improved waterway health"*.

Therefore the location of the open space should be in proximity to the Wianamatta-South Creek, in the eastern portion of the Aerotropolis Core, rather than extending into the western portion of the Precinct. This will ensure that the Wianamatta-South Creek corridor is a "shaded, central lifestyle feature" as desired by the WSAP and will maximise the interface with the Wianamatta-South Creek and maintain access to the Creek to promote green open space and recreation uses as per the "common implementation strategies" in Section 7.1.2 of the WSAP.

#### **4. CONCLUSION**

This submission outlines the proposition that the southern regional park is best located in the east/south-east of the Aerotropolis Core precinct, and should be confined within the area zoned as Mixed Use rather than in the area of land to the west of Badgerys Creek Road, for the following primary reasons:

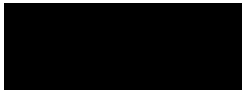
- Residential uses are not permitted in the Enterprise zone to the west of Badgerys Creek Road, and the open space should be in proximity to residential uses;
- Badgerys Creek Road provides a link into the operational airport and signals the zone boundary between Mixed Use to the east and Enterprise to the right and is appropriate for commercial/industrial development with synergies to the Airport (as per the intent of the Enterprise zone);

- Badgerys Creek Road is a natural existing barrier, with the Park appropriately confined to the east of the road;
- The park should be as far from the operational airport to the north-west and away from the 3km wildlife buffer zone; and
- The park should be in proximity to Wianamatta-South Creek in the east of the Precinct.

It is noted at this stage of planning that the investigation area for the southern regional park is very broad, and that the potential and/or location of the parkland elements will be determined during future detailed precinct planning. It is requested that the detailed precinct planning for the Aerotropolis Core precinct provide for the southern regional park to be within the Mixed Use zone to the east of Badgerys Creek Road.

We would appreciate the opportunity to discuss this submission further and/or should you require any further clarification, please do not hesitate to contact our office.

Yours faithfully,  
Planning Ingenuity Pty Ltd



Jeff Mead  
**MANAGING DIRECTOR**

