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From: [REDACTED]
Sent: Friday, 20 March 2020 9:16 AM
To: [REDACTED]
Subject: FW: Webform submission from: [webform_submission:source-title]

From: [REDACTED]
Sent: Tuesday, 17 March 2020 4:59 PM
To: [REDACTED]
Subject: FW: Webform submission from: [webform_submission:source-title]

From: [REDACTED] **On Behalf Of** DPE PS ePlanning Exhibitions
Mailbox
Sent: Friday, 13 March 2020 9:56 AM
To: [REDACTED]
Subject: FW: Webform submission from: [webform_submission:source-title]

From: [REDACTED]
Sent: Thursday, 12 March 2020 1:57 PM
To: [REDACTED]
Subject: Webform submission from: [webform_submission:source-title]

Submitted on Thu, 12/03/2020 - 13:55

Submitted by: Anonymous

Submitted values are:

Submission Type: I am submitting on behalf of my organisation

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Submission file:

[farifield-city-submission---western-sydney-aerotropolis-planning-package-12.03.2020.pdf](#)

Submission: See attached submission from Fairfield City Council

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



In reply please quote: 19/31075

Contact: Andrew Mooney [REDACTED]

12 March 2019

Western Sydney Planning Partnership
PO Box 257
Parramatta NSW 2124

Dear Sir/Madam

WESTERN SYDNEY AEROTROPOLIS PLANNING PACKAGE

Council at its meeting of the 25 February 2020 resolved to endorse the following key issues as the basis for making a submission to the Western Sydney Aerotropolis Planning Package (WSAPP).

1. There is a need for greater flexibility for consideration of additional 1 acre (4,000m²) subdivision in areas of Horsley Park, located under the 20 Australian Noise Exposure Concept (ANEC) aircraft noise contour area associated with the Western Sydney Airport.
2. Council seeks advice from the Greater Sydney Commission/relevant State Agencies regarding the likely timing for completion of investigations for the Western Sydney Freight Line and Southern Link Road Extension in Horsley Park and potential East West Passenger Rail Line in Cecil Park, so that more detailed precinct planning for the Fairfield Rural Lands Urban Investigation Area can be considered.
3. Any proposed flood controls for development located in the Aerotropolis above the flood planning level (1 in 100 year flood + 500mm freeboard) up to the probable maximum flood level, should be applied consistently throughout the Western City. This should include support to allow Fairfield City Council to align its flood controls with those of adjoining councils in Western Sydney.
4. It is requested that the Department of Planning Industry and Environment undertake extensive consultation with landowners in Horsley Park and Cecil Park to ensure the community is aware of the implications of the Western Sydney Airport Wildlife Buffer Zone for future management their land.

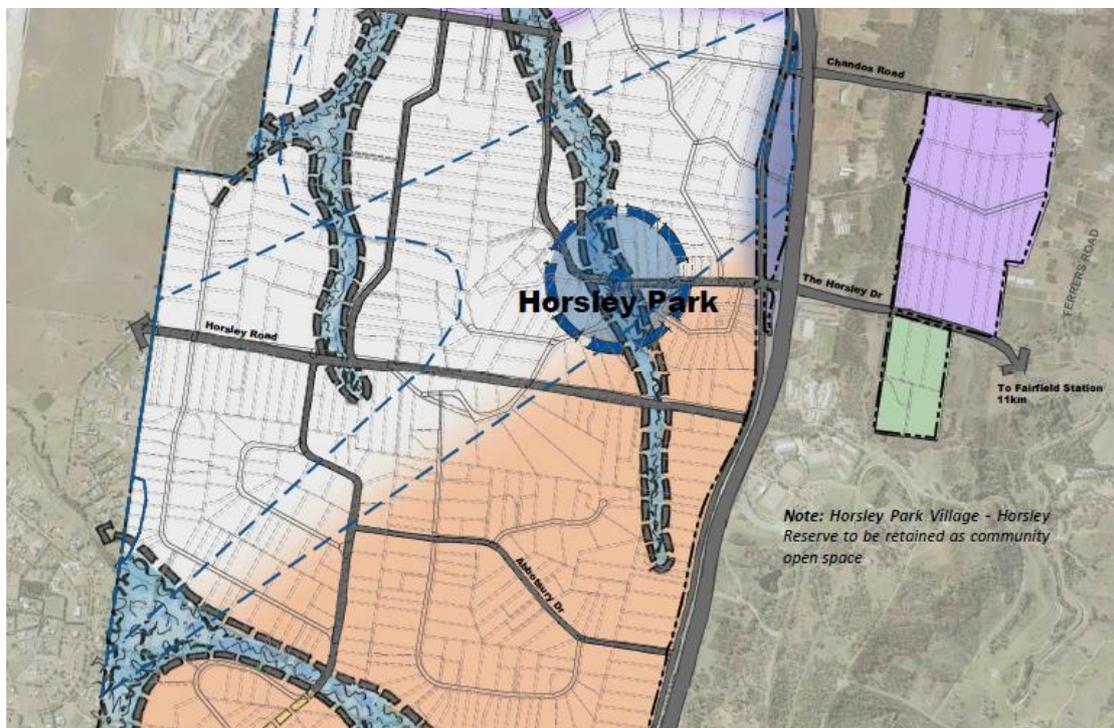
Further information in relation to Council's submission issues is detailed below.

A. Aircraft Noise Controls

The Greater Sydney Region Plan and Western City District Plan identified metropolitan rural lands in Horsley Park, Cecil Park and Mt Vernon as an urban investigation area (UIA). This step was in light of the proximity of the UIA to the Western Sydney Airport (WSA), Western Sydney Aerotropolis, existing and proposed major infrastructure (i.e. M7, M12, Western Sydney Freight Line and potential East/West Passenger Rail Line), required to service the WSA and Aerotropolis.

To this end, Council has been working with the UIA Steering Committee (chaired by the GSC and attended by State agencies) in developing a range of structure plan options for the area.

In April 2019, following extensive community consultation, Council endorsed a draft Structure Plan for the UIA. As shown in following extract, the draft Structure Plan proposes to allow additional residential subdivision (down to 4,000m² – 1 acre) in the areas of Horsley Park located under the 20 ANEC aircraft noise corridor.



Is noted that under the WSAPP, areas within the Aerotropolis located under the 20 ANEC are designated for employment/agribusiness uses or as potential Regional Parklands.

In addition to the above, the current *Ministerial Planning Direction - 3.5 Development Near Regulated Airports and Defence Airfields* states as follows:

A planning proposal must not contain provisions for residential development or to increase residential densities within the 20 ANEC/ANEF contour for Western Sydney Airport.

Fairfield City - Submission Issues

Council has written on 2 occasions to the relevant Federal and State Ministers querying the ANEC restrictions and seeking consideration of 1 acre subdivision within the 20 ANEC area. On both occasions Ministerial responses have not supported future changes to the current subdivision standards.

Notwithstanding, Fairfield City Council contends that there should be scope to consider additional residential subdivision under the 20 ANEC area based on the following key issues:

- Extensive urban development is permitted under areas of Sydney basin affected by the Kingsford Smith Airport 25 ANEC/ANEF aircraft noise footprint. This includes areas of Gladesville and Hunters Hill.
- In the past the Department of Planning has supported spot rezoning of land above the 25 ANEF around Kingsford Smith Airport for residential intensification on the basis of a noise study prepared pursuant to the Ministerial Local Planning Direction (Direction 3.5 Development Near Licensed Aerodromes).
- The approach of restricting development under the 20 ANEC pre-empts planning investigations being undertaken for the Fairfield UIA and effectively sterilizes land that could support the future Aerotropolis and contribute to Sydney's housing targets.
- A more reasonable approach would be to require an aircraft noise study and acoustic treatment of buildings where rezoning of land above the 20 ANEC/ANEF is proposed. This could be done as part of detailed planning investigations for the UIA.

B. Flood Planning

Under the WSAPP the following key considerations apply in relation to flood planning matters:

- The proposed Aerotropolis SEPP will define the flood planning level as the level of the 1 in 100 chance per year flood (1 in 100 Annual Exceedance Probability flood), plus 0.5 metres freeboard.
- No urban land uses, including additional dwellings, will be permitted on land below the flood planning level. Areas of the South Creek floodplain located below the 1 in 100 chance per year flood level as mapped on the draft Flood Extent Map are proposed for flood-compatible land uses and activities such as recreation and public spaces.

- Urban development on flood prone land above the flood planning level will be permitted, subject to risk-based flood-related development controls, encouraging more intensive development in areas of lower flood risk.
- The key performance outcome applying to flood liable land is to “*Ensure the siting and layout of development responds to flooding affectation and maintains personal safety at all times. The site layout and ultimate footprint of the development should be compatible with the flood risk. This includes applying subdivision design for greater resilience to flooding*”.

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At this stage the specific details relating to flood controls for future development located above the flood planning level (i.e. 1 in 100 year flood + 500mm freeboard) and up to the probable maximum flood (low flood risk precinct) level are unclear.

However, it is noted that the WSAPP includes the statement (above) of “*encouraging more intensive development in areas of lower flood risk*”.

Council believes this statement leaves the door open for minimal controls on development located above the flood planning level. In 2015 Council submitted a planning proposal to the NSW Department of Planning, Industry and Environment (DPIE) to align its flood related controls for development located above the flood planning level to be more consistent with flood controls applied to similar development in adjoining Council areas in Western Sydney.

To date, Council has still not received a response to its request from DPIE to amend the flood controls. To this end Council requests that any flood controls applying to the Aerotropolis above the flood planning level, need to be applied consistently throughout the Western City.

The above position is also flagged under Action 10.1 of the Fairfield draft Local Strategic Planning Statement (LSPS) and has been included in the Stage 1 Accelerated LEP Amendment recently referred to DPIE.

C. Essential Infrastructure

The following infrastructure issues associated with the WSAPP area directly relevant to future planning for the Fairfield UIA:

- Transport corridors will be protected and possible conflict with adjoining land uses prevented. This includes the proposed M12, Elizabeth Drive and potential East-West rail link.
- The Aerotropolis DCP will guide precinct planning and master planning with the Aerotropolis, which will be delivered in 2 phases. Phase 1 includes precinct planning principles, development of objectives and performance outcomes.

- New and upgraded essential infrastructure such as water, sewer and electricity is required to unlock future development within the Aerotropolis and surrounding green fill development. The Aerotropolis seeks to encourage high quality infrastructure to be adaptable and scalable to future technology.
- This will be implemented through the assessment process that requires the consent authority to be satisfied with public utility infrastructure provided or alternate arrangements for infrastructure to be made available to ensure development is serviced.
- State and local contribution plans will identify necessary infrastructure and contribution rates that will be applied to development to fund infrastructure.
- Individual Precinct Plans will be developed to provide more detailed outcomes for each precinct. These plans will include indicative layouts.
- Voluntary Planning Agreements may be used for the private sector to deliver infrastructure.

Fairfield City - Submission Issues

The issue of transport corridors is a critical consideration for future detailed planning in the Fairfield UIA. At this stage 5 key corridors (potential E-W passenger rail, Western Sydney Freight Line, M12 Motorway, Southern Link Rd extension in Horsley Park and Elizabeth Rd widening) are under investigation for the Aerotropolis and Western Sydney Airport that directly impact the Fairfield UIA.

Advice received from the Greater Sydney Commission (GSC) in September 2019 to the Fairfield UIA draft Preferred Structure Plan (as endorsed by Council in April 2019), confirms the impact of transport planning being undertaken for the Aerotropolis on the timing of more detailed investigations for the UIA, as follows:

“To ensure the success of the Fairfield UIA, the future development of the UIA is to be fully integrated with opportunities being investigated across the Western Parkland City, including infrastructure and investments associated with the Airport and a requirement for the integration of land use with future transport infrastructure”.

In this respect, Council will not be in a position to undertake more detailed investigations in the UIA until there is greater certainty regarding the provision of the infrastructure/transport corridors that are integral to planning for both the Aerotropolis and Fairfield UIA.

In the short to medium term this includes the Western Sydney Freight Line and Southern Link Rd Corridors, affecting the northern section of Horsley Park, and potential East/West Passenger Rail line through Cecil Park.

In light of the above, Council requests clarification on the time frames for further investigations associated with the transport corridors so that this information can be factored into the timing for the next stages of investigations for the UIA.

D. Wildlife Management

The WSAPP contains the following important proposals in relation to wildlife management issues:

- A Wildlife Buffer Zone Map will be included in the proposed SEPP which establishes a 3-13km buffer area from the WSA airport runways that constitutes 'wildlife hazards' for aircraft safety, mainly as a result of potential bird strikes for aircraft taking off or landing
- The SEPP will implement performance-based outcomes under the National Airports Safeguarding Framework (NASF) Guidelines – Managing the Risk of Wildlife Strikes in the Vicinity of Airports and landscape design principles to reduce wildlife attraction within the buffer zone areas.
- Under the draft Aerotropolis DCP development will be subject to a merit assessment based on the recommendations of assessment reports that address measures to minimise the potential to impact on aircraft safety.

Fairfield City Submission Issues:

It is understood that DPIE is currently in the process of developing detailed planning requirements and guidelines that relate to the management of wildlife to minimise the risk for aircraft movements over the Wildlife Buffer Zone.

All of the Fairfield UIA is located within the Western Sydney Airport Wildlife Buffer Zone. Specifically, Cecil Park is located at approximately 6km and northern sections of Horsley Park located 11km from the Airport. It is noted that large sections of the Western Sydney Parklands also fall within the buffer area.

At this stage, it is unclear how the wildlife management controls will impact on existing and future land uses in the Fairfield UIA, including how the controls will impact on environmental guidelines (referred to above) aimed at protecting existing waterways, dams and vegetation.

It is noted that currently there are numerous dams and areas of remnant vegetation scattered throughout Horsley Park and Cecil Park that have potential to generate a 'wildlife hazard'. At this stage it is unclear whether existing landowners in these areas are aware of the proposed 'Wildlife Buffer Zone' and the implications for future management of dams and vegetation on their property.

In this regard, Council requests that the DPIE undertake extensive consultation to ensure landowners in the Fairfield UIA are made aware of the proposed guidelines and potential implications for their land in relation to wildlife management.

CONCLUSION

Although not located within the area encompassed by the WSAPP, the Fairfield UIA is affected by many aspects of the Package and associated planning controls. This is a result of both the UIA's close proximity to the Aerotropolis and the impact of major infrastructure projects required to service the Aerotropolis on the Fairfield UIA.

The Fairfield UIA's location in the Western City Parklands and planning requirements of the Western City District Plan means that it is likely Fairfield City Council will need to take into account the proposed regime of planning controls being developed for the Aerotropolis under future planning for urban development in the Fairfield UIA.

In this regard, under further development and implementation of the WSAPP, Council requests that the Western Sydney Planning Partnership take into account this issues raised in this submission. Council also looks forward to working with the Partnership in realising the vision for a Western Parkland City.

Please contact the undersigned if you require any further clarification in relation to the issues raised in this submission.

Yours faithfully



Andrew Mooney

ACTING MANAGER STRATEGIC PLANNING