

#### Sent: Friday, 13 March 2020 9:58 AM

To: PPO Engagement <engagement@ppo.nsw.gov.au>;

**Subject:** FW: Webform submission from: [webform\_submission:source-title]

### **Sent:** Thursday, 12 March 2020 5:36 PM

To: DPE PS ePlanning Exhibitions Mailbox

Subject: Webform submission from: [webform\_submission:source-title]

Submission: Submission attached

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



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### SUBMISSION TO THE DRAFT WESTERN SYDNEY AEROTROPOLIS PLAN PREPARED ON BEHALF OF THE SOUTHERN GATEWAY PRECINCT COMMUNITY ACTION GROUP

This submission to the NSW Government's *Draft Western Sydney Aerotropolis Plan* (the Plan) has been prepared by APP Corporation Pty Limited on behalf of the Southern Gateway Precinct Community Action Group (otherwise known as the Dwyer Road Precinct land owners).

The Community Action Group (CAG) want to firstly thank the Planning Partnership (PP), the Western City Aerotropolis Authority (WCCA), the Department of Planning, Industry and Environment (DPIE) and Liverpool City Council (Council) for their continued engagement following release of the Plan in December 2019. Planning for the Aerotropolis is a very extensive and complex exercise which needs to balance the early success, investment in business and infrastructure and environmental objectives established in the Plan. The PP in particular are to be commended for the development of the 10 objectives which will help shape decision making across the Aerotropolis in the many years to come.

This submission presents the collective opinions of the CAG which have been consulting with different authorities since early planning for the Aerotropolis in 2015/16. It is supported by letters from Angus Taylor, the Federal Member for Hume and Peter Sidgreaves - State Member for Camden. Both letters are supportive of greater certainty around the future planning and infrastructure outcomes for the Dwyer Road Precinct.

The purpose of this submission is to present the CAG's key issues with the Plan, including:

- The need to communicate a greater level of detail and certainty around the timing for rezoning of the Dwyer Road Precinct and when infrastructure will be available;
- More clarity around the out of sequence rezoning and precinct planning process identified in the Draft SEPP Discussion Paper;
- A greater acknowledgement and realisation for the opportunities which can and will exist for the Southern Gateway Precinct;
- Greater recognition around the adverse impacts of the Airport and Aerotropolis in the short-medium term on existing residential properties and the need for protective measures to be outlined in the Plan.

#### **The Southern Gateway Precinct**

The Southern Gateway Precinct CAG is one of the largest land owner groups assembled in Greater Sydney. It incorporates the majority of lands within the Dwyer Road Precinct to the south of the Western Sydney (Nancy Bird-Walton) Airport (WSA), including over 240 properties and over 1,000 residents and land owners (refer to Figure 1). Collectively, the Precinct represents approximately 750+ hectares of lands currently zoned R5 Large



Lot Residential and RU4 Rural Small Holdings under the Liverpool Local Environmental Plan (LLEP 2008).

Whilst the Plan describes the lands as comprising mainly 'rural holdings' and "observed agricultural industries", the reality is that the majority are residential properties occupied by families and residents, many of whom have lived in the area for decades. Some small-scale rural and agricultural activities occur in parts of the Precinct; however, these are mainly secondary to the predominant residential use.

The Precinct is bounded by The Northern Road to the north and east; lands in the newly refined Agribusiness Precinct to the north, Greendale Road and the South Creek West Precinct to the south and the M9 Orbital Link corridor to the west. The Precinct is the only non-Initial Precinct in the Plan which has a direct interface to the Western Sydney Airport.

The Precinct has excellent access to existing and proposed future transport infrastructure including:

- The M9 Orbital
- Upgraded Northern Road
- Bringelly and Greendale Roads
- Future North-South Rail and Stations at the Airport and Bringelly
- The Nancy Bird-Walton Airport

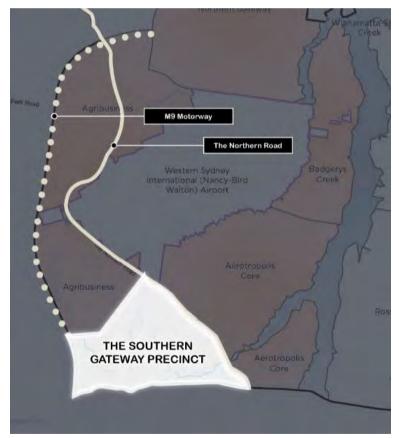


Figure 1 – Southern Gateway Precinct within the Aerotropolis

The Precinct also has excellent access to existing social infrastructure with numerous community assets in and around the Bringelly township including the community hall and sporting grounds (Bringelly

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Reserve), the Bringelly Public School, childcare centres and local shops. Utility infrastructure services are limited to electricity and broadband communications networks; however, recent upgrading of The Northern Road is introducing a supply of mains water to parts of the Precinct. The properties are currently reliant on pump-out sewer systems and rainwater tanks for water.

The Precinct includes over 200 individually titled properties with areas between 2 and 10 hectares. A number of farm dams currently exist which collect and manage the natural flows of water and the topographical conditions are varied due to the historic agricultural / rural uses and construction of dwellings and shed structures.

#### About the CAG

The Southern Gateway Precinct CAG has existed in some form for many years. The land owners within the Precinct have long been a close-knit community who share collective ideals and aspirations for their area. They are highly organised and understand the value of participating in the public discussion around the WSA and Aerotropolis.

Currently, the CAG is in the process of formalising their organisational structure under a self-developed Memorandum of Understanding (MOU) which is underpinned by a series of objectives, including:

- 1. Progressing the orderly and expeditious planning of the lands
- 2. Resolving impediments to the planning process and the delivery of infrastructure
- 3. Collectively determining appropriate exit strategies over time
- 4. Working collectively and having an organised structure to work with Government into the future

The CAG appreciates their current situation and key impediments to the early rezoning of their lands, namely the immediate availability of utility infrastructure. The fragmented nature of the lands in the Precinct has been historically identified as a significant challenge for planning and investment attraction and this is identified in the Plan. Accordingly, the CAG in recognition of these issues is strengthening the formality of their organisation to better work with Government and the private sector to unlock the Precinct for future development. It is understood this process will take a number of years to fully resolve and that collaboration is crucial.

#### The Objectives of the Plan

The Plan is underpinned by 10 objectives to shape decision making across the four themes presented in the *Greater Sydney Region Plan*; productivity, sustainability, infrastructure and collaboration, and liveability. These objectives are supported by more detailed planning principles.

The CAG supports the objectives of:

- Providing an accessible and well-connected Aerotropolis that enables employment in emerging industries and supports job growth in Western Sydney.
- Sustainability-led outcomes for the built and natural environments is also fundamentally supported and the aims to lower emissions, protect wildlife and water re-use are critical in the delivery of a 21<sup>st</sup> century city, particularly an industrious one.
- Collaborative planning to ensure challenges to delivery and opportunities for the Precinct are fully reconciled and realised.



#### **Greater Certainty Around Timing to Rezoning and Infrastructure**

The Precinct is identified as a non-Initial Precinct or a 'Remaining Precinct' under the Plan. The Plan currently provides little certainty around when the Precinct will be rezoned, or when utility infrastructure services will be available to allow for future development. By contrast, all of the other six precincts bordering the WSA are identified as Initial Precincts which will be rezoned to Agribusiness, Enterprise, or Mixed Use by mid-2020, with precinct plans to be released later this year. Whilst the challenges of fragmentation and the sequencing of infrastructure delivery is understood, the lack of information around the timing of the Precinct's rezoning is not. The CAG considers that the Plan unfairly omits the Precinct from immediate rezoning where adjacent precincts to the east (Aerotropolis Core) and west (Agribusiness Precinct) are to be rezoned this year.

Clarification is also sought around the following terminology "sequence precinct planning and rezoning to match infrastructure provision and the rate and nature of development in the initial precincts and adjoining areas." This statement seems to be in direct contradiction of the main purpose of the plan to "share the benefits of population and economic growth and create employment, develop skills and boost productivity", particularly where alternative strategies to the delivery of infrastructure could enable equivalent market interest in the Dwyer Road Precinct. The CAG is genuinely concerned that they are being unfairly left behind in order to benefit other land owners to the north, east and west.



The current sequencing approach is considered an issue for a number of reasons:

The lack of information around 1. the timing of rezoning and infrastructure delivery leaves over 200 individual land owners with no clarity around their exit strategy. It is fully acknowledged that the residential properties in the Precinct will over time transition to Flexible Employment uses, however, this transition should occur ahead of the operations of the Airport, not after.

- 2. Delays in the rezoning and development of the Precinct will unnecessarily halt the sale and transition of these residential properties, leaving residents susceptible to significant adverse impacts from industrial developments and operations of the airport.
- 3. Delays will also create issues with interfaces to the emerging residential and mixed use precincts to the south of Greendale Road in South Creek West. If this development proceeds ahead of Dwyer Road, it could unnecessarily restrict certain development outcomes (i.e. larger or heavier industrial operations or more intensive land uses).
- 4. It unfairly promotes the immediate take up and development of lands in the Initial Precincts to the north, east and west; lands that are under the ownership of government, large land-owners, developers and major institutions. Planning and development in the Aerotropolis should be founded on equal opportunity of outcome which the Plan does currently not promote.
- 5. It does not account for the ability of alternative infrastructure servicing providers to enter into agreement with land owners to bring forward the serviceability of the Remaining Precincts to aid in the orderly and efficient development of the Aerotropolis.
- 6. Under the Plan, the current rural and large-lot residential zonings and development controls will continue to apply until such time that the lands are rezoned. This is considered problematic in that it continues to allow for land uses and developments that are and will be inconsistent with the surrounding land uses and operations of the WSA to the north, east and west.

#### Recommendations

- The Plan should identify the Dwyer Road Precinct as an Initial Precinct to provide greater certainty to the land owners which will enable the orderly sale and transition of the lands.
- To provide greater certainty for all, the Initial Precincts should be staged (i.e. the first two stages (2020), the following two stages (2021) and so on).
- Government's plans for the timing and delivery of utility infrastructure services should be included in the final Plan. As an example, Sydney Water's delivery plans for mains water and sewer should be captured as a new chapter or section in the Plan.
- The Plan should include some recognition or detail of alternative infrastructure servicing providers. For example, where an alternative energy, water and wastewater entity can properly plan and coordinate delivery of infrastructure in any precinct, options to accelerate rezoning and

development outcomes 'could' be considered. Such detail would need to form part of a Voluntary Planning Agreement or other arrangements with Government.

Government also need to provide some timing and certainty around the Biodiversity Certification
process. It is understood that the lands within the Dwyer Road Precinct are currently the subject of
assessment under the *Biodiversity Conservation Act 2016*. To enable future zoning and development
of the Precinct, a commitment to whole-of-Aerotropolis certification needs to be confirmed in the
final Plan and details around when this can be expected to occur.

#### **The Out of Sequence Process**

The Draft SEPP Discussion Paper provides a framework to establish an optional master planning process. It stipulates *"under limited circumstances, landowners will be able to provide granular details of land use allocation and arrangements across a site, which if approved may lead to the use of other planning pathways."* This alternative master planning process is available only to lands that are zoned and comprise at least 100 hectares.

The master plans must address any specific requirements issued by the Secretary of DPIE for a site or proposal. Importantly, the master plans can be undertaken concurrently with Precinct Plans.

This alternative pathway is supported by the CAG as it provides opportunities for landowners and developers to work collectively to deliver their visions for the future of their lands in consultation with the PP and other government departments. The alternative pathway could also be expanded to trigger the early rezoning of precincts not identified as Initial Precincts where:

- The proponent could demonstrate the availability of infrastructure under an Infrastructure Servicing Strategy and Plan
- The proponent could demonstrate commitment to development outcomes under a Development Delivery Plan
- Commitments from end-users of a character which align with the collective vision and desirable uses for a specific Precinct are affirmed through MOUs or similar
- The master plan is supported by an economic impact assessment which confirms that no adverse economic impacts will be borne by the Initial Precincts

More detail around this alternative process should be provided in the final Plan, particularly around how proponents can engage with the PP and DPIE in expediting planning processes.

#### Recommendations

- Provide more detail around the alternative framework for master planning 100ha+ precincts in the Aerotropolis
- Consider expanding this alternative pathway to trigger early rezoning / release of precincts where infrastructure, development outcomes, pre-commitments from industry to end use and economic analysis is provided to the satisfaction of Government.

#### The Opportunity for the Southern Gateway Precinct

The Plan currently has limited information around the intended future outcomes and opportunities for the Dwyer Road Precinct. The CAG has long recognised the opportunity for the Southern Gateway to match the significance and attention of other precincts including the Northern Gateway, the Aerotropolis

- Core and the Agribusiness Precinct. As a consolidated holding, the Precinct has:
- Excellent access to existing and planned future transport and social infrastructure;
- A significant geographical position as the southern anchor to the WSA as well as a transition area between the mixed use precinct in the Aerotropolis Core to the east, the predominantly future residential lands of South Creek West to the south and the newly planned Agribusiness Precinct to the north west.
- Opportunities for direct access and links onto the planned M9 Orbital.
- Over 700ha of largely unencumbered lands which can serve connections and support the future expansion of the WSA and development of the Aerotropolis.

To complete the vision for the Aerotropolis, it's southern anchor in the Southern Gateway Precinct needs to be more properly considered for its opportunities and benefits. The Precinct can unlock multiple additional opportunities over the longer-term. The Plan currently identifies the Precinct as future Flexible Employment with the following strategic outcomes:

 Provide employment opportunities close to Aerotropolis Core Precinct



- Encourage Opportunities linking to Agribusiness Precinct
- *Acknowledge the existing rural village character of Bringelly* (not considered an important element by the CAG)
- Utilise and expand the existing social and cultural infrastructure
- Manage the interface and relationship with South West Growth Area

Whilst the above strategic outcomes are noted, the Precinct can also offer the following strategic opportunities:

- Contribute to the establishment of contemporary and sustainable mixed business parks underpinned by research industries, medical and education institutions, urban services and recreation facilities;
- Deliver strategic north-south links connecting the M9 Orbital to the WSA and east-west links connecting the Agribusiness Precinct to the Aerotropolis Core (in the form of road and rail links); and
- Major tourism attraction and a high-quality temporary accommodation sub-precinct for international and domestic visitors and workers.

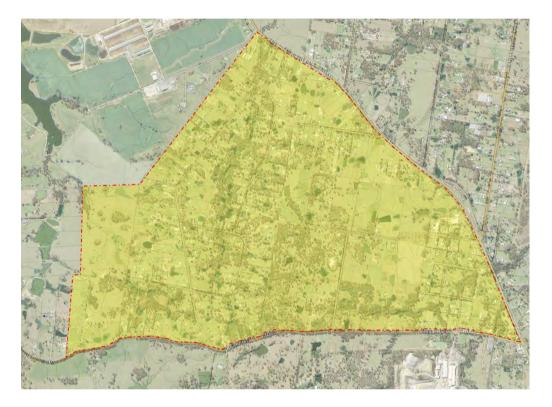
#### **Recommendations**

- Reconsider and build upon the vision and strategic outcomes for the Dwyer Road Precinct. Identify specific strategic opportunities based on the Precinct's position within the Aerotropolis to more clearly define its function and desired uses.
- As part of refining the vision, consider renaming the Dwyer Road Precinct to the Southern Gateway Precinct to better represent and embody the future outcomes.
- Consider and acknowledge opportunities for future links and connections within and around the

#### Precinct.

#### **Overcoming Land Fragmentation**

The Plan identifies land fragmentation in the Precinct as a major challenge to rezoning and orderly development. The driving force behind the organisation of the CAG is to enable the ease of transition of ownership from residential land owners to industry in the most orderly manner. It also establishes a greater convenience for representation and collaboration with Government and the private sector which cannot be underestimated.



Fragmented land ownership has proven to be repeated impediment to orderly development in rezoned precincts including most notably Leppington. Rezoning alone is not necessarily enough to overcome the challenges associated with existing land owner fragmentation, although certainty around uplift to planning controls can assist. Liverpool City Council and others have long understood these challenges and have developed innovative LEP provisions and are continuing to investigate strategies to overcome these challenges as part of planning frameworks.

The establishment of the CAG is a significant step to enabling rezoning and future development in the Precinct. They are committed to working closely with Government over the next few years to develop strategies to tackle the challenges of planning for and overseeing the orderly development of lands.

#### Recommendations

• Establish groups of planning experts to develop precinct plans with the organised land owner groups, whilst still allowing a level of self-determination and involvement in the delivery of visions and plans for precincts.

#### **Impacts to Residential Properties**

The most fundamental issue of the Plan and the sequencing approach for the Aerotropolis is the reality that over 200 residential properties will be located underneath an operational airspace in 2026. The PP has been clear that it anticipates rezoning and development of the Dwyer Road Precinct beyond the opening of the airport. This is probably the greatest flaw of the Plan, but it can be rectified with greater certainty and planning for these lands between now and 2024.



The Plan identifies approximately one third of the Precinct as being located underneath the flight path and within the ANEC 20-25. Almost the entirety of the Precinct is also identified within the 3km wildlife buffer and is near to the southern ends of the runways within the Public Safety Areas. Multiple adverse impacts are likely to be borne by the residents in the Precinct including, but not limited to:

- Health impacts associated with aircraft noise as existing dwellings are not appropriately acoustically attenuated;
- Health and safety linked with any potential failures to operations including aircraft strike, unplanned dumping of fuels or waste from overhead aircraft;
- Increased impacts to health, safety and property from wind turbines, lighting, reflectivity and vibration; and
- The collective reduction to residential amenity, which should be guaranteed for existing residential areas.

The Plan cites the importance of safeguarding the future operations of the WSA from development and land use activities in the Aerotropolis, however, it fails to pay due consideration to protection of residential amenity from the multiple adverse impacts from the airport. It is of no argument that residents who are likely to remain in their homes in 2026 deserve a level of consideration for their health, safety and general wellbeing. This sentiment is echoed in the supporting letters from the Hon. Angus Taylor, the Federal Member for Hume and Peter Sidgreaves, the Local Member for Camden.

#### Recommendations

- The final Plan should identify the full extent of possible adverse impacts to residents who are earmarked to be remaining in the Precinct in 2026.
- The final Plan should include measures or ideas to protect residents from impacts from the operations of the WSA and surrounding developments in the Aerotropolis Core and the Agribusiness Precincts.
- Consider bringing forward the rezoning and precinct planning for the Dwyer Road Precinct and focus on strategies to overcome challenges of land fragmentation, infrastructure delivery and market

challenges to transition lands from residential. Allow for consideration of alternative mechanisms to forward track planning with the objective of moving residents on prior to the opening of the airport.

• Clarify the statement "a precautionary approach to residential development and other noise sensitive development within the ANEF 20 and above will be taken". What does the precautionary approach involve, and does it apply to existing residential properties in the Precinct?

#### Summary

The CAG thanks the Planning Partnership and others for the opportunity to provide this submission to the second Draft Aerotropolis Plan. The urgency in finalising the Plan to enable rezoning of the Initial Precincts is understood and the extent of work undertaken to date is fully appreciated.

The Dwyer Road Precinct presents significant opportunities. The CAG considers that the full extent of the opportunities and future potential of the Southern Gateway Precinct have not been recognised in the Plan. Additional details and clarifications are also required as identified throughout this submission.

The main concern for the CAG is the current lack of certainty of outcomes around rezoning and the delivery of infrastructure to the Precinct. This uncertainty has significant detrimental impacts to the 250+ residents and land owners as it inhibits the orderly transition of residential lands to employment lands in time for the opening of the WSA. The result is that residents are exposed to unnecessary duress and recognised future aircraft noise and other health and safety impacts.

All of these issues are able to be mitigated as part of the final Plan by recognising:

- The Dwyer Road Precinct as a focus Precinct for accelerated rezoning as an Initial Precinct where alternative infrastructure solutions can be demonstrated.
- The greater opportunities in terms of future land use and development outcomes to better frame the Precinct's position in the market place.
- The need to develop mitigation strategies to manage future impacts of airspace operations to existing residents.
- The promotion of a coordinated approach and strategies to overcoming land fragmentation challenges.

The CAG looks forward to working closely with all levels of Government into the future to resolve future impacts, issues and deliver the powerhouse which will be the Western Sydney Aerotropolis.

Please feel free to contact the undersigned should you wish to discuss any of the matters raised in this submission.

Yours sincerely



Josh Owen SENIOR ASSOCIATE PLANNER APP CORPORATION PTY LIMITED



# ANGUS TAYLOR MP

- FEDERAL MEMBER FOR HUME

A strong voice, for Hume

#### Letter of Support – Southern Gateway Precinct Community Action Group

I am pleased to support the submission of Southern Gateway Precinct Community Action Group (SGP), Dwyer Road Precinct. The SGP are proposing they advance to Stage 2 of Land Use Infrastructure Implementation Plan (LUIIP) for the Aerotropolis. SGP are requesting that priority be giving to the rezoning of the Dwyer Road Precinct to Flexible Employment Land. The Precinct includes over 250 residential properties and approximately 748 hectares of land.

SGP is preparing a joint submission in response to State 2 of the LUIIP and are hoping to be provided with an official decision about the timing of the rezoning of their precinct.

As the Local Member for Hume, I have met with representatives of this group on two occasions to discuss this proposal for rezoning. They have provided a valid and soundly based approach to presenting their position which is solely for the timely rezoning of the Dwyer Road Precinct.

As mentioned, SGP is a group of small landowners who are seeking a fair hearing and a positive road forward so they can make well informed decisions about their future. Larger landowners have the advantage of resources and knowledge about the planning processes. However, I have found the representatives of SGP, Paul Coyto and Helen Anderson to be well informed and focussed on ways to facilitate the rezoning of their lands in a constructive manner.

SGP are to be congratulated for their initiative and taking steps to work effectively as a large land owner group rather than individually. By providing a shared objective and one voice they present an organised and cohesive message on behalf of their community.

I note that the Dwyer Road Precinct is the only area that borders the Airport that does not have confirmation about the timing of their future rezoning. All the other precincts within a 3km radius have been advised that rezoning will completed at the end of this year. The residents of this precinct however have no timeframe other than a formal statement that it will not be before the airport is operational. They are concerned about the impacts on their health and lifestyle of living next to a 24/7 operational airport with this precinct also being affected by ANEC 20-25 noise contours.

The Southern Gateway Precinct Community Action Group (SGP), Dwyer Road Precinct, will be preparing a submission that provides the justifications, rationale and strategies to facilitate a fast tracking of the rezoning process. I ask that consideration be made to reviewing their submission and the timeframe for rezoning.

Yours sincerely,



ANGUS TAYLOR MP Member for Hume 0 4 FEB 2020

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## Peter SIDGREAVES MP Member for Camden



March 11 2020

Helen Anderson Chair Committee of Landowners Dwyer Road Precinct (Southern Gateway Precinct) Via email- sgpbringelly@outlook.com

Dear Ms Anderson

As requested, please find below excerpt from letter to the Minister for Planning regarding the Dwyer Road Precinct:

#### Dwyer Road Residents Group

The Dwyer Road Residents Group includes approximately 250 properties that will be impacted by the Draft Western Sydney Aerotropolis Plan. The residents are in the newly created Dwyer Road Precinct.

#### **Residents Concerns**

The main concern of these residents is that the Dwyer Road Precinct is not planned to be an Initial Precinct even though the majority of the Dwyer Road Precinct is located within 3 Kilometres from the Western Sydney International (Nancy-Bird Walton) Airport and inside the Australian Noise Exposure Concept (ANEC) 20-25 zone.

The residents are concerned that they will soon have an airport operating 24 hours a day and 7 days a week on their door step. They will also have development and construction happening in neighbouring precincts, who are Initial Precincts, including the Aerotropolis Core Precinct to the east and north-east and the Agribusiness Precinct to the north and north-west.

Further, the Draft Western Sydney Aerotropolis Summary of Key Planning Documents, December 2019 on page 14 states "the timing of detailed planning for the non-initial precincts will depend on a range of factors, including market demand and the timing of the delivery of infrastructure and services to the Aerotropolis." This concerns the residents as they have no certainty as to when the proposed rezoning of the Dwyer Road Precinct to Flexible Employment will occur.

#### **Residents Proposed Solution**

The residents would like the Dwyer Road Precinct to be included as an Initial Precinct.

I completely understand that not all precincts can be included as initial precincts. However, could I please ask that consideration be given to the Dwyer Road Precinct being included in the Initial Precincts?

Yours faithfully

Peter Sidgreaves MP Member for Camden



4 March 2020

Mr Paul Coyto Southern Gateway Precinct Community Action Group

BRINGELLY NSW 2556

Dear Paul

We appreciate this opportunity to write in support of the submission being made by the Southern Gateway Precinct Community Action Group (SGPCAG) with respect to the *Draft Western Sydney Aerotropolis Plan (WSAP)* as exhibited by the Western Sydney Planning Partnership.

In doing so, we note that we have also lodged a submission on the *Draft WSAP* with respect to Boral's priorities in the region. This, however, focuses separately and exclusively on the proposed Enterprise Zones in the Badgerys Creek sector of the Aerotropolis.

Specifically, through this letter we offer our support to the SGPCAG's seeking of a changed classification within the *Draft WSAP* for the 'Dwyer Road Precinct' at Bringelly to 'Initial Precinct' for future rezoning purposes.

Boral has had a long association with the Bringelly community by virtue of its former ownership of the (now PGH) Greendale Road brickworks, and current construction of the new Bringelly concrete batching plant on neighbouring land.

In first proposing the latter, we recognised the significant investment made toward the new concrete facility was justified by the potential for the site to support projected growth around the immediate area.

This growth is already well in evidence. To the south, the continued expansion of residential areas in Oran Park and Cobbitty toward Bringelly has promoted Camden into being the fastest growing Local Government Area in the entire country.

Similarly, preparatory infrastructure works such as the upgrade of The Northern Road, Bringelly Road and other arterials surrounding the Aerotropolis demonstrates the foreshadowed development of the region is advancing.

Accordingly, the local community is in the midst of experiencing the physical and social change signalled via various State Government South West Growth Area plans of the past 20 years, now to be augmented by further instruments such as the *Draft WSAP*.

Through our ongoing connection to local stakeholders, many of whom have been resident in Bringelly for lengthy periods, we know many landowners find themselves at a resulting 'crossroads'.

Most have reached a critical stage where they must decide either to maintain their existing property and lifestyle in a location which will be completely different in 10 years' time, or begin making



alternative plans to maximise the return from their investments as should be the right of any landowner.

As pointed out by the SGPCAG, those opting for the second course of action will be stymied by the lack of certainty about the future permissible uses of their largely rurally-zoned land should the *Draft WSAP* be adopted in current form without the Dwyer Road Precinct being treated as 'Initial'.

The *Draft WSAP* instrument should be in place to relieve such concerns, especially once the oftrepeated aspiration that the Western Sydney Airport (WSA) should be central to a well-planned, sustainable and livable future precinct affording opportunities to all is considered.

We agree with the SGPCAG that proposed deferral of updated planning arrangements for the Dwyer Road Precinct may in fact deny the early opportunities for the Bringelly community proposed to be extended to every single other community interfacing with the WSA.

We question the equity in facilitating a clear set of parameters for these other communities, allowing landowners there distinct advantage over Bringelly counterparts, both in terms of time to plan out future land uses and consequently potential land value.

For many years, it's been clear both the Federal and State Governments see the establishment of the WSA as a generational opportunity to significantly increase and physically shift the greater Western Sydney employment base. The rapid development of suburbs to the south and increasing population suggests this is a commitment quickly nearing the point of requiring delivery.

With the substantial land space contained by the Dwyer Road Precinct, and the SGPCAG's proposition this land is ideally suited to host a range of job-providing businesses, we believe it's critical to assess the precinct now and avoid losing the opportunity to support this outcome.

Deferring until a later stage to see what transpires as the community grows may be appealing, however our view is taking this course will leave matters unresolved for the existing residents and future investors who will eventually deliver on the objective.

For current Bringelly residents, the realising of the true value of their properties may be lost forever if not dealt with at this early stage.

Investment may be negatively impacted should, in the absence of any current direction, future decisions be taken to utilise the precinct for 'missing' purposes which prove incompatible, or which support ad hoc uses offering unsustainable or limited job numbers.

In summary we fully support the SGPCAG in their view that it's time to address all of these issues, and that the first step toward this is for the *Draft WSAP* to equitably recognise all WSA interface communities as 'Initial Precincts'.

We sincerely hope the SGPCAG are successful in their endeavours as, in our view, it would offer just compensation to a community which undoubtedly be substantially different once the WSA is completed and beyond.

Yours faithfully



**Robert Giddings** General Manager, Boral Concrete (NSW/ACT) Boral Australia