

12 March 2020

Secretary
NSW Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir

**Submission to Draft Western Sydney Aerotropolis Plan (WSAP), Draft SEPP & Draft DCP, [REDACTED],
[REDACTED] Kerrs Road, Mount Vernon**

Metroplanning Services has been engaged by the owner of [REDACTED] Kerrs Road, Mount Vernon to prepare an objection submission in regard to the Draft Western Sydney Aerotropolis Plan (Draft WSAP), Draft State Environmental Planning Policy and Draft Western Sydney Aerotropolis Development Control Plan-Phase 1 which have recently been placed on exhibition for public comment.

Site Details

In reviewing the draft planning instruments, we have considered the locational and physical characteristics of our client's property which is currently rural residential in nature and contains a single dwelling with associated out buildings. A photograph of the site taken from the street frontage is provided below. The site is irregular in shape and has a moderate fall away from Kerrs Road towards low lying land that is traversed by a natural drainage line across the middle access handle portion of the site as identified in Figure 1. The site comprises predominantly cleared grassland. An aerial depiction of the site is contained in Figure 2.



Photo 1-View of site from Kerrs Road frontage

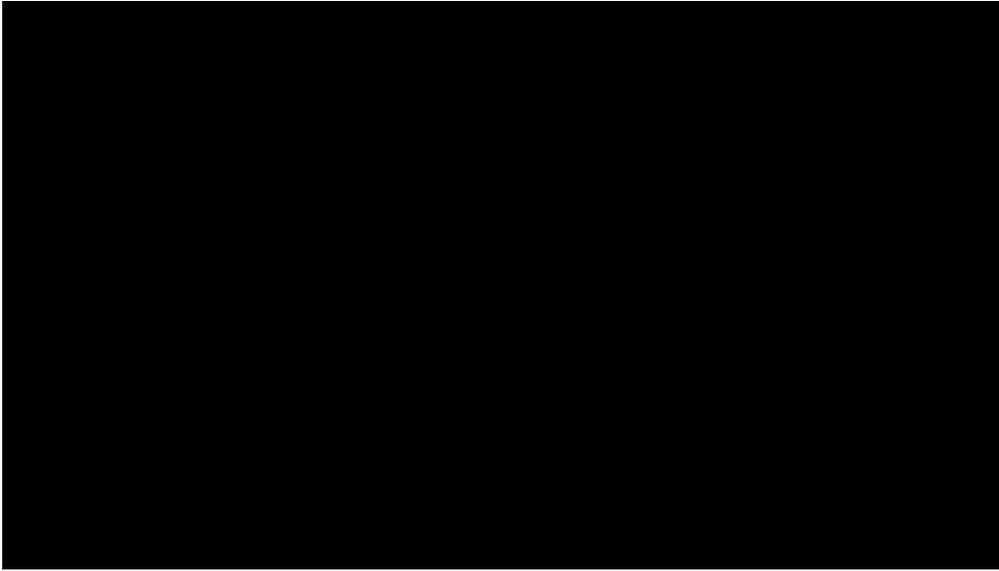


Figure 1-Location plan

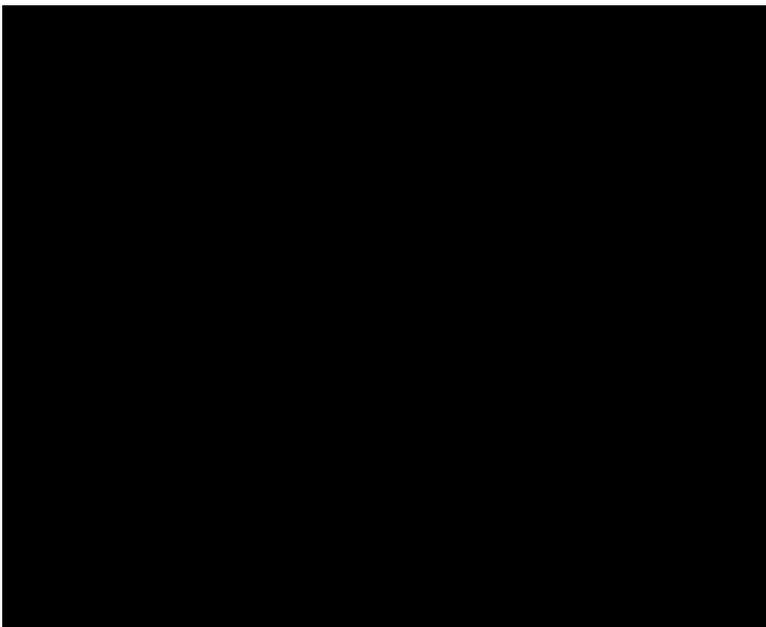


Figure 2-Aerial view of site

The site is currently zoned [REDACTED] under the provisions of Penrith Local Environmental Plan 2010. A landuse zoning map is contained in Figure 3.

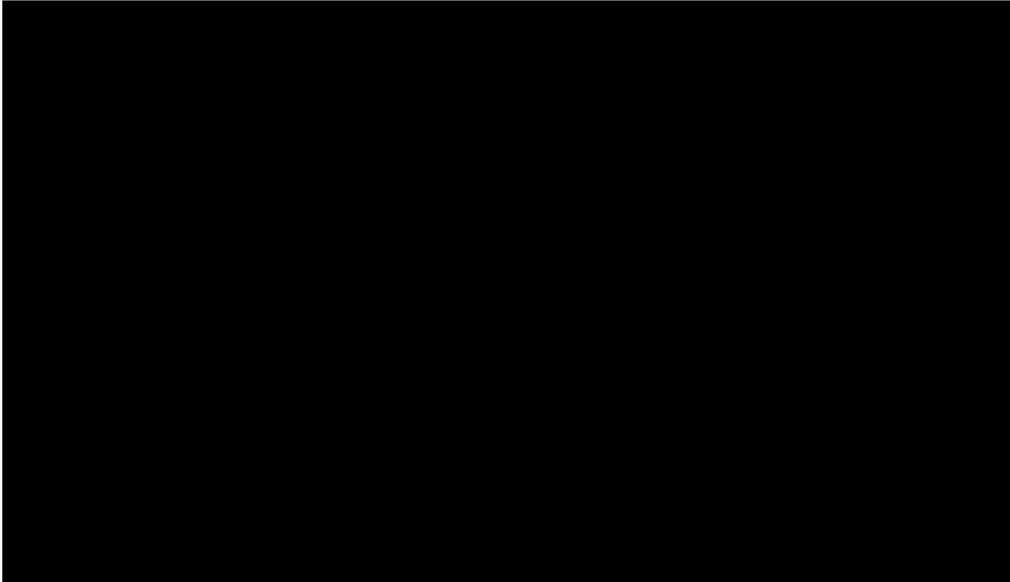


Figure 3-Penrith LEP landuse zoning map

Introduction

We have reviewed the supporting mapping and documentation associated with the Western Sydney Airport and note that The Draft Western Sydney Aerotropolis Plan (WSAP) presents the vision and planning framework for the Aerotropolis. The Draft WSAP includes, planning objectives and principles for the Aerotropolis, different land uses identified for each of the precincts, infrastructure to support the Aerotropolis, the sequence that precincts will be developed.

The Draft Western Sydney Aerotropolis State Environmental Planning Policy provides the planning legislation to support the draft Aerotropolis plan. The SEPP will also ensure State legislation supports the implementation of the WSAP. The Draft SEPP establishes precinct boundaries, applies land use zones to the initial precincts and provides requirements for developing near the Western Sydney International Airport.

The Draft Western Sydney Aerotropolis Development Control Plan Phase 1 aims to promote design excellence in the Aerotropolis precinct plans and masterplans. The DCP will be developed over two phases. The DCP Phase 1 (draft now on exhibition) provides the vision and objectives for each of the initial precincts.

We have reviewed the Draft Western Sydney Aerotropolis SEPP and note that the middle access handle portion of the site is identified to be zoned part Environment and Recreation under the Draft SEPP landuse zoning plan contained in Figure 4. We understand that the zoning has largely been derived given the flooding affectation constraint on the property which is depicted in Figure 5. We have spoken with a representative of the Department of Planning and have been advised that the front northern portion of the site fronting Kerrs Road and the rear southern portion of the site will retain the existing zoning of the site

which is [REDACTED] under the provisions of Penrith Local Environmental Plan 2010. We are advised those portions of the site have been excluded given they are located outside of the Aerotropolis boundary line as identified in Figure 6.



Figure 4-Draft SEPP landuse zoning mapping

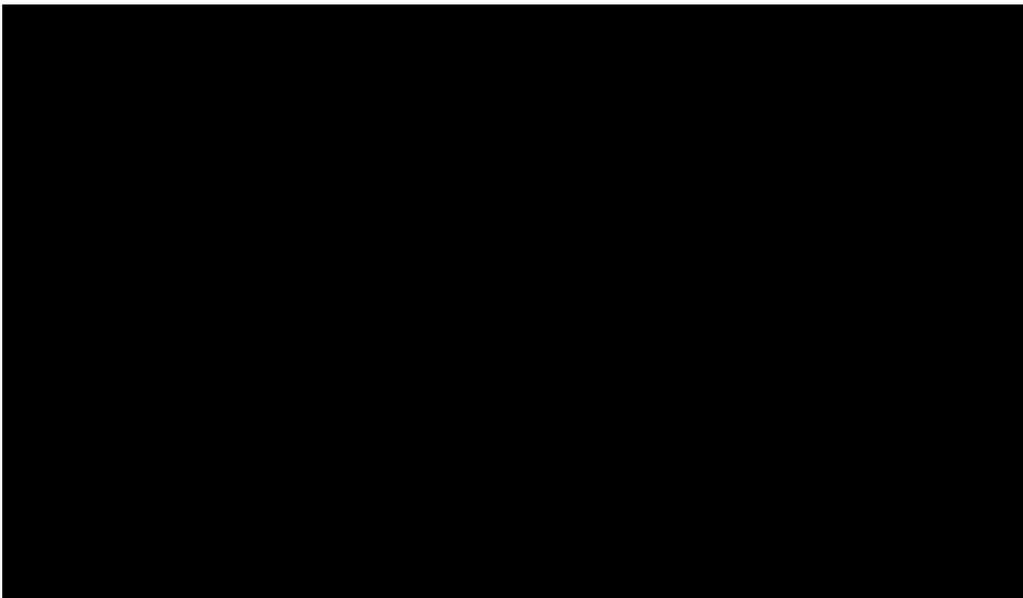


Figure 5-Draft Aerotropolis SEPP flood mapping

We understand that the broad application of the Environment and Recreation Zone will be to permit both environmental and recreational land uses. The objectives of the Environment and Recreation Zone are to:

- *To protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values.*
- *To prevent development that could destroy, damage or otherwise have an adverse effect on ecological or recreational values.*
- *To enable land to be used for public open space or recreational purposes.*
- *To provide a range of recreational settings and activities and compatible land uses.*

- To ensure that development is secondary and complementary to the use of land as public open space, and enhances public use, and access to, the open space.
- To encourage, where appropriate key regional pedestrian and cycle connections.

The zone permits limited uses without consent, including Environmental protection works and Flood mitigation work. Permitted with consent uses are Environmental facility, Information and education facility, Kiosk, Recreation area, Recreation facilities (outdoor), Water recreation structure and Road.



Figure 6-Aerotropolis Structure Plan

Objections

Amenity Impacts

Our client is concerned that the recently exhibited Draft Mamre Road Precinct Plan which is proposed to be included in the Western Sydney Employment Area through proposed changes to the State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP) will have significant impacts upon the rural residential amenity of the Mount Vernon area. We note that the public exhibition period has closed for the Draft Mamre Road Precinct Plan however our client has serious concerns that the intended zoning of the area as predominantly IN1 General Industrial will adversely impact the amenity and traffic movements of rural residential properties in the Mount Vernon area. Refer Figure 7 Draft Mamre Road Precinct Landuse zone mapping. The red star identifies our client’s property.

We have reviewed the Mamre Road Precinct plan and note that the land abutting the rear of properties in Mount Vernon Road are proposed to be zoned IN1 General Industrial with a Transition Area of 250m deep. We note that the public exhibition of the draft Mamre Road Precinct plan has closed however we request that the land adjoining this Transition Area be zoned IN2 Light Industrial in order to minimise potential amenity impacts upon the rural residential character of the Mount Vernon properties. Also that the Transition Area should be zoned as E3 Environmental Management which will ensure that the depth of the

E3 zone is sympathetic to the environment and minimises impact from man-made hazards that may result from the industrial land uses in the IN2 zone. Refer Figure 8 illustrates the proposed transition area with zig zag lines.

It is important to note that Local Councils and the Department of Planning in the preparation of the Draft LEP's have zoned land adjoining residential properties IN2 Light Industrial zones. The same 'planning principle' should be initiated in regard to the Draft Mamre Road Precinct Plan in order to protect the residents of Mt. Vernon Road and there should be provision for a broader area of land zoned IN2 Light Industrial closer to Mount Vernon properties.

Traffic Impacts

Concern is raised regarding the industrial transport and traffic impacts on the surrounding street network particularly the residential areas of Mount Vernon. There is likely to be a significant increase in freight and logistics traffic with the efficiency of key intersections surrounding the Precinct likely to suffer. We are particularly concerned with the intersection of Kerr Road and Mamre Road to the south-west of the site which is likely to receive significant additional heavy vehicle traffic 24/7.

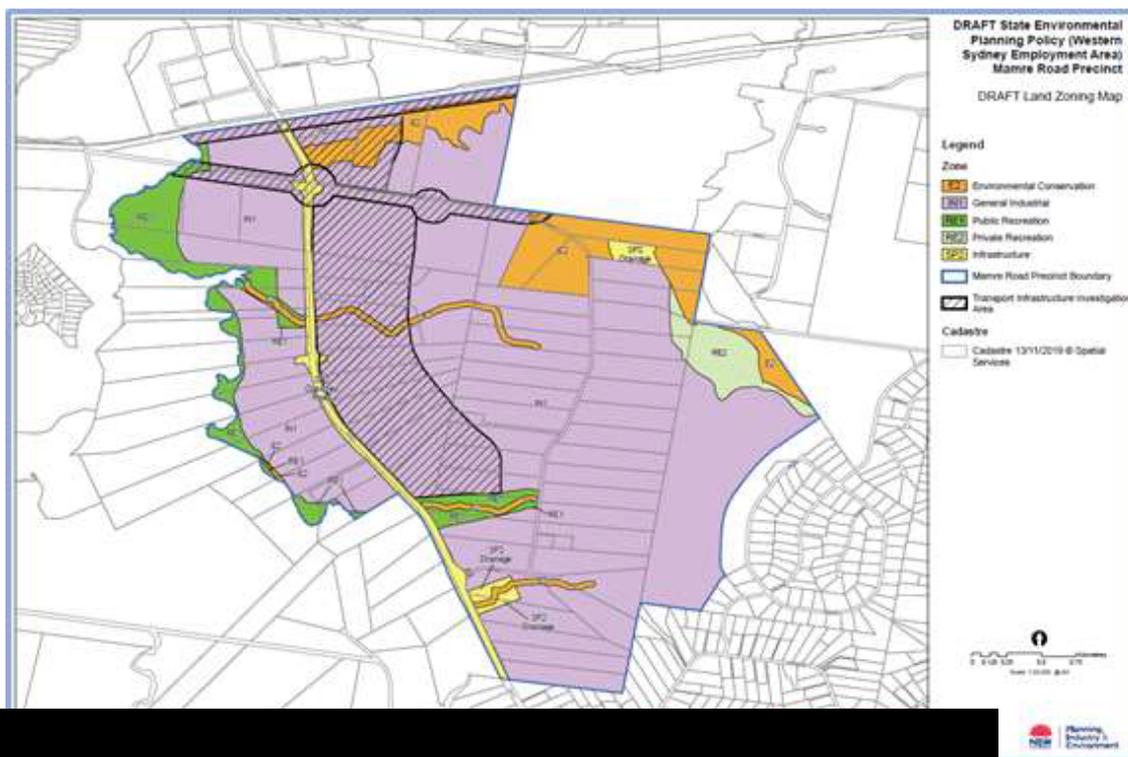


Figure 7-Draft Mamre Road Precinct landuse zoning mapping

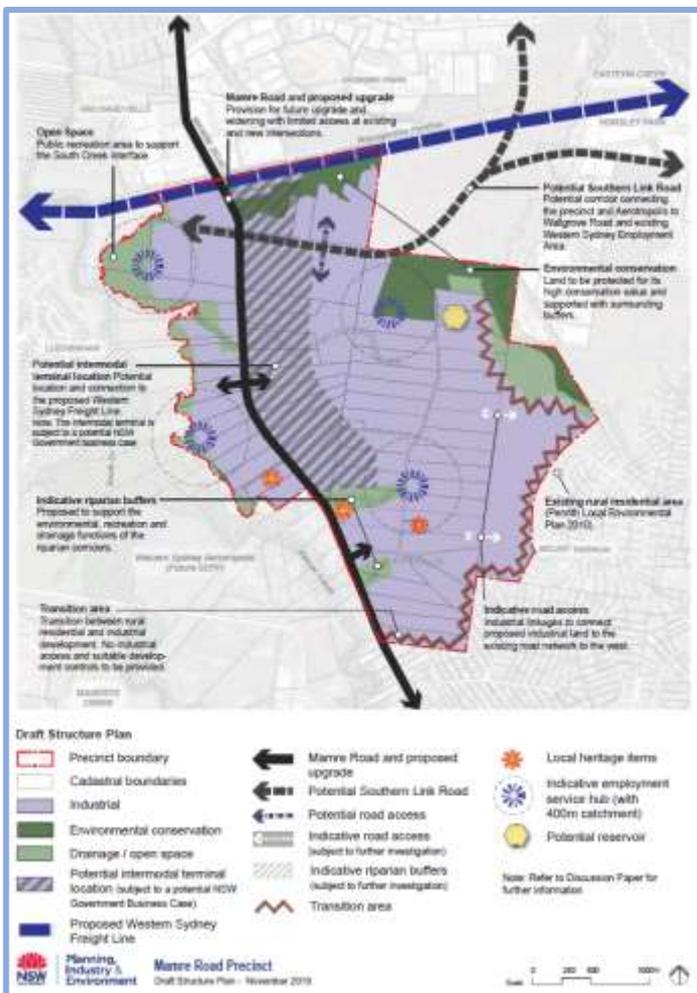


Figure 8-Draft Mamre Road Structure Plan

In conclusion, we seek that the Department undertake further consideration to the adverse amenity and traffic management impacts that the Draft Aerotropolis Plan and Draft Mamre Road Precinct Plan will have upon the amenity of our client's property and accordingly make amendments.

We can be contacted on [REDACTED] the Department requires any clarification.

Yours Faithfully

[REDACTED]

John Mckee
DIRECTOR