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**From:** [REDACTED]  
**Sent:** Friday, 20 March 2020 10:29 AM  
**To:** [REDACTED]  
**Subject:** FW: Webform submission from: [webform\_submission:source-title]

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**From:** [REDACTED] **On Behalf Of** DPE PS ePlanning Exhibitions Mailbox  
**Sent:** Friday, 13 March 2020 2:28 PM  
**To:** [REDACTED]  
**Subject:** FW: Webform submission from: [webform\_submission:source-title]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 12:54 PM  
**To:** [REDACTED]  
**Subject:** Webform submission from: [webform\_submission:source-title]

Submitted on Fri, 13/03/2020 - 12:51  
Submitted by: Anonymous  
Submitted values are:  
Submission Type:I am submitting on behalf of my organisation  
First Name: Krystal  
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Submission file:  
[20200313-perich-group-submission-wsap.pdf](https://pp.planningportal.nsw.gov.au/draftplans/exhibition/western-sydney-aerotropolis-planning-package)

Submission: Perich Group Submission in response to the Draft Western Sydney Aerotropolis Plan – Dated December 2019

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

# SUBMISSION TO NSW GOVERNMENT

Submission by



Regarding

## **Draft Western Sydney Aerotropolis Plan – Dated December 2019**

*“We take a long-term view, one that is needed to build a city of global significance, and we understand that working collaboratively will achieve the best outcome.”*

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## Who are we?

The Perich Group is a large privately owned and operated group of companies. We are a multi-generational family business with a significant role to play in the future of the Western Sydney Aerotropolis. The key aspects of our group that are relevant to this submission are:

- We own large parcels of land within and nearby to the Aerotropolis precinct, including 311 ha within the Aerotropolis Core Precinct and 532 ha within the Agribusiness Precinct
- We have extensive experience in agriculture, predominantly dairy, beef cattle and cropping
- Our farms supply a public company that manufactures and exports food to Asian and other international markets and
- We own and operate a highly successful property development business with significant experience in delivering residential land, retail, commercial and employment projects.

Our head office is based in Bringelly, south west of Sydney on property neighbouring the Western Sydney Airport site.

Agriculture is the foundation of our family business. We are one of the largest dairy farming businesses in Australia milking over 12,000 cows. We largely supplement the feed requirements of the dairies via the crops produced on our network of farms. We are actively involved in developing improved farming methods for efficiency, energy generation and waste management.

Our property development business has delivered and sold over 4,500 residential lots in Oran Park, a large number of those lots were delivered via a project delivery agreement with Landcom. We see our understanding and experience delivering master planned communities as a key advantage to the development opportunities for the Aerotropolis.

Oran Park is a master planned community, Australia's newest town; a project that commenced in 2010 that now boasts a growing mix of lifestyle, employment and social infrastructure. To date the project has delivered a civic precinct including council chambers, library and parks, commercial office suites and a retail shopping centre.

We are well-advanced in our planning for the next major growth phase for the Town, which will include an indoor leisure centre, apartment buildings, the next stage of the retail centre, new office towers and supporting facilities and services.

Oran Park Town will play an important role in the initial development of the Aerotropolis by providing immediate capability to support businesses wishing to establish themselves in the Western City. This may include either by providing them with a site at Oran Park for their immediate accommodation needs, providing access to existing professional services in Oran park that their businesses will require, or by providing high quality homes and communities for where their employees can live.

Of most importance to us as a family who has lived, worked and invested significantly in our local community for over 80 years, is the enormous pride, willingness and excitement we have to be part of the Aerotropolis journey and make a meaningful contribution to it.

## **General Comments and Observations Regarding the WSAP**

### **1. Opening observations**

- We welcome the release of the documentation pack in the timeframe promised by Government and acknowledge the considerable work by all parties in preparing the pack.
- This submission will make limited detailed comments on the documents released so far. It will instead focus on some bigger ideas to build on the very solid work which has occurred to date.
- The documentation is considered and well-developed and we also note that additional documentation will be prepared in coming months to round out the package. Relevant considerations are:
  - The Western Sydney Street Design Guidelines and Western City Digital Action Plan will be very important guidance documents for future planning exercises and should be shared as soon as possible
  - The Place Infrastructure Compact (being prepared by the GSC) and State Infrastructure Contributions (DPIE) are not yet available. These documents are fundamental to those released for comment and should be worked on as a priority so that they are available in draft form before SEPP and DCP (Phase 1) controls are locked in over the coming months and
  - The detailed precinct controls in the draft DCP are also not available. Again, these should be made available before the SEPP controls are finalised so the cumulative impact of development controls can be understood by all parties.

### **2. Further information on infrastructure provision is required**

- While provision of this information is foreshadowed in later documents including the Place Infrastructure Compact, an understanding of overall servicing strategies; staging and timing; infrastructure contributions; etc. is needed in the very near term so that land owners and others can start to make investment decisions which help implement the vision for the Aerotropolis in a short timeframe.
- Reference is made to “innovative utility provision” (DCP, p.20) which suggests there is a willingness to consider perhaps both new infrastructure types, and new ways of funding its provision. Given the enormity of the task, we are supportive of new methods to plan, fund and build infrastructure provided the innovation required to implement these new models does not unreasonably delay other important initiatives such as industry attraction.
- We remain convinced that Sydney Water’s *Western Sydney Regional Master Plan* is a key document for guiding future development in the Aerotropolis and the Western Parkland City in general. For example, whether recycled water will be provided in future development is a baseline consideration, particularly for larger landowners who are able to facilitate the delivery of critical trunk infrastructure.

- The Perich Group has demonstrated its ability to align its activities to help Government deliver its priorities at Oran Park. The prompt release of Sydney Water's *Western Sydney Regional Master Plan* will allow us to quickly determine how we could offer similar assistance at the Aerotropolis and its environs.

### **3. Information on development contributions frameworks is also needed**

- While provision of this information is also foreshadowed in later documents including the Place Infrastructure Compact and State Infrastructure Contributions plan, early release of this information, even at “in-principle” level of detail, will allow landowners, financiers and the development industry to respond quickly to Government’s final policy positions. For example:
  - The Aerotropolis Plan (pp. 84-85) says the PIC will consider “other” funding sources in addition to Federal, State and local government, developer contributions and the customer base of utility providers. While the “other” sources are not disclosed in the current documents, we believe an infrastructure bond or similar mechanism should be considered as part of the overall funding solution
  - The percentage of capital infrastructure cost intended to be funded via SIC should be openly stated up front as the industry will factor this cost into land acquisition decisions
  - How any proposed “value capture” mechanism is intended to operate for uplift provided by the Airport and Metro, and the percentage of cost to be captured from a value sharing mechanism, also needs to be stated up front for the same reasons.
- State and local infrastructure funding strategies are due for completion in late 2020, after final Precinct Plans have been prepared for the initial precincts. Draft funding strategies should be exhibited concurrently with draft Precinct Plans in mid-2020 to provide landowners, financiers and industry the certainty the need to mobilise quickly to help Government deliver its objectives.

### **4. Outcomes are expressed as aspirations with few metrics defining them**

- The development standards which will define how these aspirations will be achieved are presumably in the Phase 2 DCP (not yet available for review/comment). In absence of these standards, it is difficult for landowners and the development industry to understand potential impacts and costs.
- We encourage Government to make the standards available as soon as possible so these impacts can be calculated and understood. For example, different standards for nitrogen, phosphorus and suspended solid loads in South Creek will have vastly different impacts on the type of Water Sensitive Urban Design infrastructure deployed in the ‘urban’ zones and the amount of otherwise developable land that will be required for their provision.

## **5. Some road and rail connections would work better if configured differently**

- We believe there are several road and rail connections shown in the draft documentation which could achieve the same objectives, or meet additional ones, if they were differently configured. These are shown diagrammatically in Attachment 1.
- In summary our main suggestions are:
  - The Aerotropolis Core's Metro station and city centre may be better located further north on the ridge line. This will create a better relationship between the city centre, the station and Thompsons Creek and South Creek
  - The draft plans suggest that the core would straddle the creek. We believe this will diminish the ability for the town centre to have strong connections between the railway station and a definable CBD area, framed by city centre support activities. If amended as we suggest this will allow the creek and the CBD to be a mix of civic and public spaces, achieving strong connection to the blue/green grid. This area could include a sports stadium (closer to the station) or an open campus university with a mix of congregation and ceremonial spaces.
  - We also suggest that Fifteenth Avenue connect directly to the airport to achieve a stronger relationship between the airport and the new city centre, as well as a secondary access for emergency egress purposes. This is especially important if the Government wants people landing in western Sydney to stay in western Sydney. This will also enable the FAST transit proposed along Fifteenth Avenue to connect to the airport in a meaningful way. Good public transport (other than the Metro) between the airport and the town centre, using the FAST transit or similar, should also be considered.
- The scale of the city centre core is approx. 800m long (walkable distance from the station) and 400 wide. This is reasonably comparable to the city centres of Parramatta, Liverpool, Campbelltown and Penrith. As a context to the Sydney CBD, it is equivalent to the main business area between Circular Quay to King Street (northern end of the Pitt Street Mall) and from Macquarie Street to George Street. This is a considerable area and we think the suggestions made above will help this area function as envisioned by Government.
- Attachment 2 shows how the draft SEPP zoning map could be accommodated to take account of the above observations

## **6. Consider additional performance criteria as a gateway for allowing large landowners to prepare masterplans, not just the size of the land holding**

- The draft SEPP (pp.32-33) anticipates large landowners may wish to prepare their own masterplans for their properties and permits this for sites in excess of 100ha.
- This is an enabling provision and opens the door to reduced planning timeframes, greater certainty and quicker approvals, which we strongly support.
- We appreciate the reasoning behind stipulating a minimum holding size of 100ha to enable this provision. However, there might also be merit in relaxing these standards in

particular circumstances to allow owners of holdings less than 100ha to prepare DCPs in cases where an appreciable public benefit is delivered as an early outcome. This might include:

- Delivery of a key piece of physical infrastructure which benefits other landowners (road; power; sewer; water)
- Delivery of major components of blue-green grid, regional open space or human services.

## **7. The simplified planning system promised by WCAA is not evident - yet**

- Page 14 of the draft DCP lists 30 separate documents/studies that are required to support a development application, noting the list is not exhaustive. We are concerned this will complicate rather than simplify the planning system.
- Details of exempt and complying development are not yet available, however, we advocate for a very extensive list so that the number of applications subjected to the far-reaching documentation requirements is minimized.

## **8. Priority should be given to development proposals in “B” and “I” zones**

- The success of the Western City Parklands hinges on the success of the Airport and Aerotropolis. Together, these places will anchor the economic future of the Western Parkland City and will be the centre of the region’s jobs into the future.
- Therefore, the State should send a clear signal that it values and will prioritise development assessment where it involves investment in jobs and services in the Aerotropolis, particularly in the early stages of development. This idea is expanded in point 11 below.
- The land use planning controls in the Aerotropolis and its environs, including the list of permissible uses, should contemplate that the Aerotropolis will undergo several “waves” of development before the area reaches maturity. This may take decades to achieve. Therefore, the continuation of existing uses, or the introduction of interim uses, which support Government’s longer term objectives should not be discouraged. Accordingly, the list of prohibited uses in the SEPP requires careful consideration so as not to discourage legitimate interim uses which achieve still broader “B” and “I” objectives.

## **9. The Planning Partnership has been effective: can it be given another purpose?**

- The Planning Partnership has made significant inroads across councils in a short time on vexed issues like common planning and design standards, street design, street tree planting and shared use of open space and community facilities.
- If Government is interested in a value-add proposition, the Planning Partnership model could be extended to also include approval of certain classes of development application, acting as a “DA Assessment Centre of Excellence” in the region.



- The DA Assessment Centre of Excellence could be made responsible for assessing all applications for development in the “B” and “I” zones. A “case management” approach could be applied to major development applications as it is to priority or complex medical cases, where specialist services are co-ordinated by an appointed case manager who is empowered to achieve the best outcome benefiting the client.
- Government has done something similar to this in the past by bringing various services together under the Service NSW banner. This logic could now be applied to development in the Western Parkland City, even on a trial basis, to test the merit of this approach.
- Benefits of this approach include:
  - Career development/upskilling of capable junior planners in the region, encouraging them to stay and develop their careers in the region
  - Ensuring the intent and IP in the current suite of planning documents prepared by the Planning Partnership is not lost when those documents are handed over to local councils for interpretation/implementation
  - Providing a feedback loop on the impact and outcomes of the planning controls, allowing for quick amendments to improve/refine the system.
- An industry attraction strategy to be managed by WCAA, working closely with the DA Assessment Centre of Excellence (to ensure a separation of interests/powers) would also benefit from the certainty in timing and (presumably) outcomes this system could provide.

#### **10. Camden Council should be consulted on major issues and its views considered**

- While none of the Aerotropolis precincts are in Camden LGA, the orientation of the documentation makes it feel as though Camden Council has been overlooked when preparing the document suite.
- For example, the draft SEPP (p. 24) references Liverpool and Penrith flooding data as relevant inputs to planning processes. Presumably Camden’s flooding information is also a relevant input for South Creek and its tributaries. Equally, significant infrastructure serving the Airport (like the Metro) will ultimately pass through Camden at some time in the future.
- LGA boundaries are arbitrary: commercial, civic and retail development catchments pay them no regard and spill across them. Planning in the Aerotropolis area should therefore consider Camden Council’s views on important planning issues occurring in the Aerotropolis but whose impact is felt in the Camden Council area.
- This could be achieved simply by the Direction the Minister will issue under section 9.1 of the *Environmental Planning and Assessment Act 1979* stipulating that Penrith and Liverpool Councils need to consult with Camden Council on certain classes of planning or development application, and consider the Council’s views when making decisions on those matters.

#### **11. Provide certainty beyond the Aerotropolis boundary by gazetting the Metro corridor**

- Although the current planning package is focused on Aerotropolis and initial precincts, it is important not to overlook linked areas beyond these immediate boundaries, both north and south
- For areas to the south, the single thing Government could do to provide greater certainty to industry and the wider community would be to gazette the corridor for the Metro rail.
- We understand the vertical and horizontal alignments are now set. This is evident in the fact that referrals for developments adjoining the exhibited corridor boundary are now required, and also by the very detailed comments are being provided by Transport for NSW to those referrals.
- Gazetting the alignment will allow all parties (Government, land owners, businesses and the wider community) to continue planning for development with certainty. While gazetting the boundary may trigger land acquisition requests from owners in certain circumstances, securing the alignment, particularly over smaller holdings, will ensure ease of implementation at a later stage.

#### **12. Commit to extending the Metro southwards to Campbelltown**

- We cannot see any references to Sydney Metro Greater West Stage 2 (the southern connection to Campbelltown) in the documents that have been released for consultation. We understand a strategic business case has not yet been prepared for this link and if this is true the lack of reference to the link, in absence of a funding and timing commitment from Government, is understandable. In addition, the southern extension of the Metro falls beyond the area covered by these plans.
- While this may be the case, we believe planning for a successful Aerotropolis cannot occur without contemplating the route and timing for Sydney Metro West Stage 2. Connecting existing centres such as Campbelltown, Narellan and Oran Park to the Aerotropolis as soon as practical is vital for several reasons:
  - These areas provide a willing workforce for uses located in the Aerotropolis
  - Existing centres can provide initial services for the Aerotropolis if they are properly connected to it
  - Travel habits, once established, are very difficult to alter. Completing the southern connection as soon as possible will establish early travel patterns to the Aerotropolis, prioritising public transport over private motor vehicles.
- The Perich Group encourages Government to proceed with planning for the Stage 2 link as a priority and would like to work with Government to find ways to facilitate the early provision of the southern Metro link to Campbelltown.

### **13. Acquisition of land for Environment and Recreation purposes could be prioritised**

- Land in the Leppington Pastoral Holdings Pty Ltd (LPH) holding along Thompsons Creek is proposed for acquisition under the SEPP. The approximate area for acquisition is an additional 16ha over and above the land affected by the 1:100 flood level, which of itself is approximately 26ha.
- However, nearly 8ha of land that was previously in the South Creek Precinct (and not able to be developed) has been added to the Aerotropolis Core. Thus, there is a net impact of approximately 8ha of land lost from LPH's developable footprint from LUIPP Stage 1 to the current plan.
- It seems the additional acquisition area has been proposed to ensure riparian corridors are wide enough to provide useful habitat and recreational values, noting the Thompsons Creek 1:100 flood line is very narrow in places in the LPH holding.
- On face value, there would be few benefits for LPH in retaining ownership of the land in the short to medium term, particularly if it will be used for recreation uses in the longer term. Therefore, acquisition of the land as soon as practical after the SEPP's gazettal may meet both LPH and Government objectives.

### **14. The status/purpose of the Regional Parkland (Investigation) notation is unclear**

- The draft Aerotropolis Structure Plan map (p. 27) shows an "egg" over a large portion of the LPC holding with the annotation "Regional Parkland (Investigation)" in the map key. The draft SEPP does not have a Regional Parkland zone or any controls related to such a zone.
- It is not clear if this annotation is intended to refer simply to the land proposed to be acquired as described above, or if there is a further proposal to allocate additional land for a Regional Parkland. We seek clarity on this question as a priority, given its potential impact on our future farming and land development plans.

### **15. There is an unprecedented focus on retaining all significant vegetation which will be very difficult to achieve**

- We appreciate why this is an important objective in terms of meeting the overall vision for Western Parkland City and for addressing major issues in the region such as urban heat island effect, habitat conservation and establishing a green/blue grid which adds value to the area.
- It is unlikely the degree of preservation/conservation envisaged in the draft documentation can be achieved in the context of the significant (re)forming of landscapes associated with broadacre land subdivision in a greenfield situation. There is a need to ensure that the overall objective of retaining vegetation is still achieved, but its importance against the important objective of ensuring the Aerotropolis is established as the anchor use to the Western Parkland City needs to be carefully considered.

- We suggest some sort of triage be applied to ensure higher value vegetation is retained and lesser value vegetation can be removed. Higher value vegetation might be distinguished from lower value vegetation by its relative extent, the completeness of the ecological communities present and the impact on achieving other Aerotropolis outcomes if the vegetation is retained.
- If lesser value vegetation is approved for removal, replacement ratios should be sufficiently high to ensure the Western Parkland City's overall objectives of "greener" and "cooler" are still met.

#### **16. Biodiversity corridors are shown in areas which have questionable biodiversity value**

- In November 2019, following a meeting with Department of Planning, Industry and Environment staff, we prepared a submission suggesting a potential distribution of biodiversity/riparian areas across the Perich Group's "Base Farm" holding in the Agribusiness precinct. Our submission was addressed to Steve Hartley, Executive Director, Biodiversity & Sustainability and was supported by an expert consultant report.
- The consultant's report observed that most of the Hydroline streams mapped on "Base Farm" site do not constitute 'rivers' as defined under the *Water Management Act 2000*. The report also observed that most Hydroline streams did not possess a 'bed' or a 'highest bank', nor did they constitute a 'natural channel or a 'natural channel artificially improved' as defined under the Act.
- The consultant's report concluded that the Hydroline streams on "Base Farm" had predominantly very low biodiversity or conservation value due to the long history of extensive and intensive agricultural use and that the only biodiversity values were restricted to relatively small sections of the larger watercourses on the subject site.
- The draft Land Zoning Map in the SEPP shows a network of Environment and Recreation corridors, presumably based on Hydroline streams, meaning the proposed Environment and Recreation zoning on "Base Farm" is shown in places where there is questionable biodiversity value due to the intensive agricultural activities which have been conducted on that land for many years.
- It is not clear whether our submission informed the proposed Environment and Recreation zonings in the draft SEPP, given it was made very close to the release of the draft SEPP package. We ask that this matter be re-examined and we can supply a copy of our previous submission if necessary.

#### **17. We welcome the opportunity for future collaboration in the next stage of planning**

- We would welcome the opportunity to work more collaboratively with Western Sydney Planning Partnership and Western City & Aerotropolis Authority in developing the next phase of planning documents for the Aerotropolis.

- This is especially so for any master planning which may be commenced in the near future for either the Agribusiness or Aerotropolis Core, where the Perich Group has substantial land holdings.
- Future planning should give careful attention to questions of staging and timing of zoning to avoid any unintended consequences. For example, how future zoning exercises may impact land tax that is payable by owners, especially if land is rezoned but development is delayed because of utility infrastructure provision or similar issues, needs to be addressed so all parties can act on any rezoning with confidence.

## Summary

The Western Sydney Aerotropolis is a project that will span generations. As a family-based group one of our key principles is long-term planning for the benefit of current and future generations. We see our part in the development of the Western Parkland City from that same perspective.

While we are keen to make progress, we value strategic planning which occurs in a considered manner and which delivers greater certainty for all stakeholders at each successive step. We appreciate that this type of planning takes time and we believe it best occurs in collaboration with others who have an aligned interest in achieving great outcomes.

The Perich Group are a key stakeholder and we are in a unique position to help Government deliver key aspects of the Aerotropolis. We welcome and encourage further direct engagement with Government during this key planning stage and ask that all correspondence on this submission be directed to;

Tim Bryan  
Chief Executive Officer  
Perich Group  
1675 The Northern Road  
BRINGELLY NSW 2556



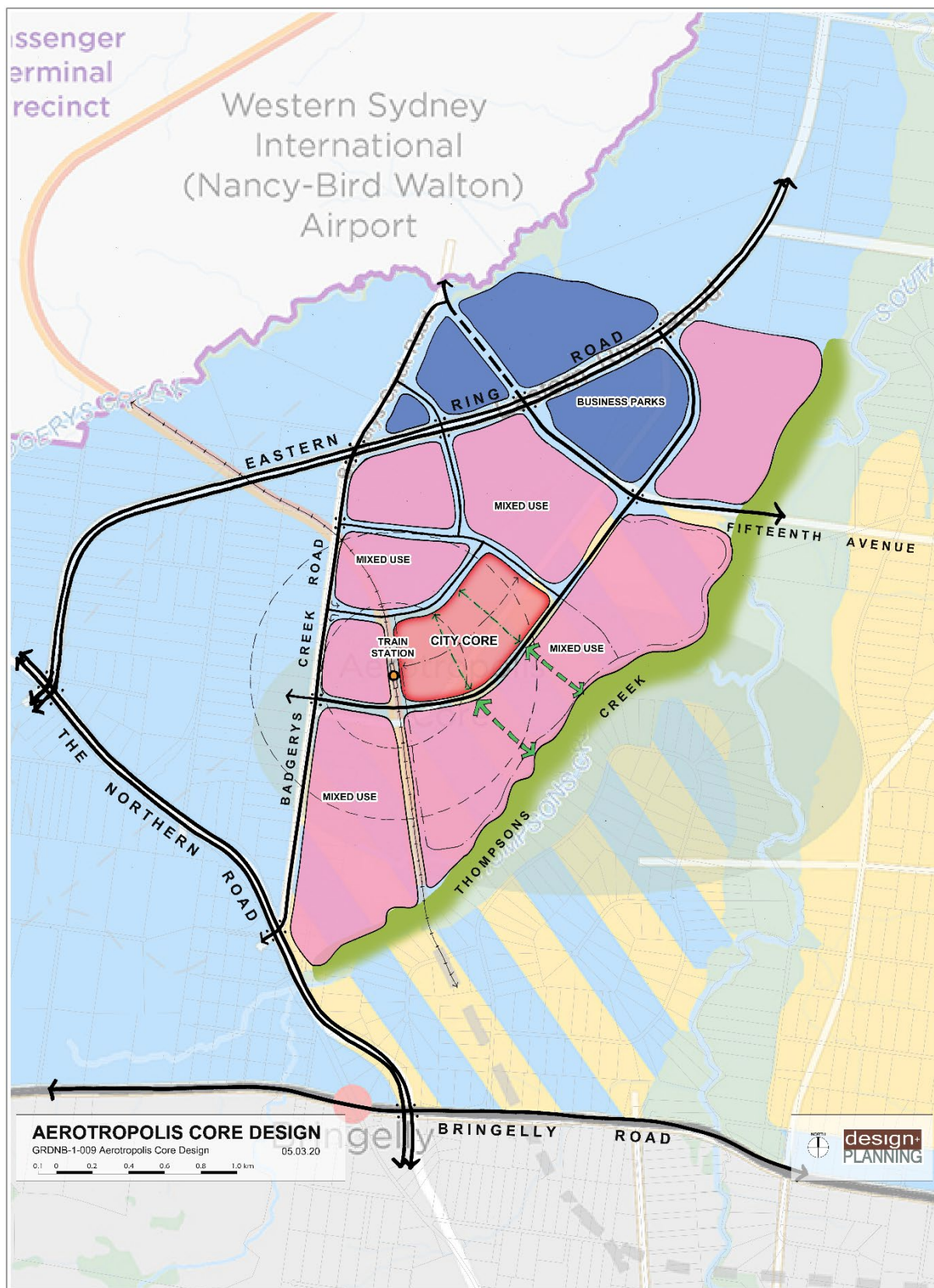
Anthony Perich AM  
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**Attachment 1 – Urban Structuring Ideas**



## Attachment 2 - Draft SEPP Zoning Map

