

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 17 March 2020 3:37 PM  
**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 3:36 PM  
**To:** [REDACTED]  
**Subject:** FW: Webform submission from: [webform\_submission:source-title]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 3:34 PM  
**To:** [REDACTED]  
**Subject:** Webform submission from: [webform\_submission:source-title]

Submitted on Fri, 13/03/2020 - 15:30  
Submitted by: Anonymous  
Submitted values are:  
Submission Type:I am submitting on behalf of my organisation  
First Name: Stephen  
Last Name: McMahon  
Name Withheld: No  
Email: [REDACTED]  
Suburb/Town & Postcode: Leppington  
Submission file:  
[200313-let.dpie\\_aeroprecinct.pdf](#)

Submission: Please see attached submission.

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

Date: 13 March 2020  
File: New.C03



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

Dear Sir,

### **Submission on Exhibition of Aerotropolis Planning Package**

We write on behalf of the Maryland Development Partnership (ABN 78 119 050 541). It represents a major landowner in the North West 1 Sub Precinct in the South West Growth Area, on Greendale Road (being Lot 103 DP1242964) adjoining and directly to the south of the Aerotropolis Planning Area.

The location of the land in relation to the Planning Area is identified in red in the plan in Figure 1 on the following page.

The Maryland Development Partnership is in discussions with Government regarding the commencement of the rezoning of the land. As such it has a significant interest in the adoption of appropriate zoning and development controls for, and the sequencing of infrastructure in, the Aerotropolis Planning Area.

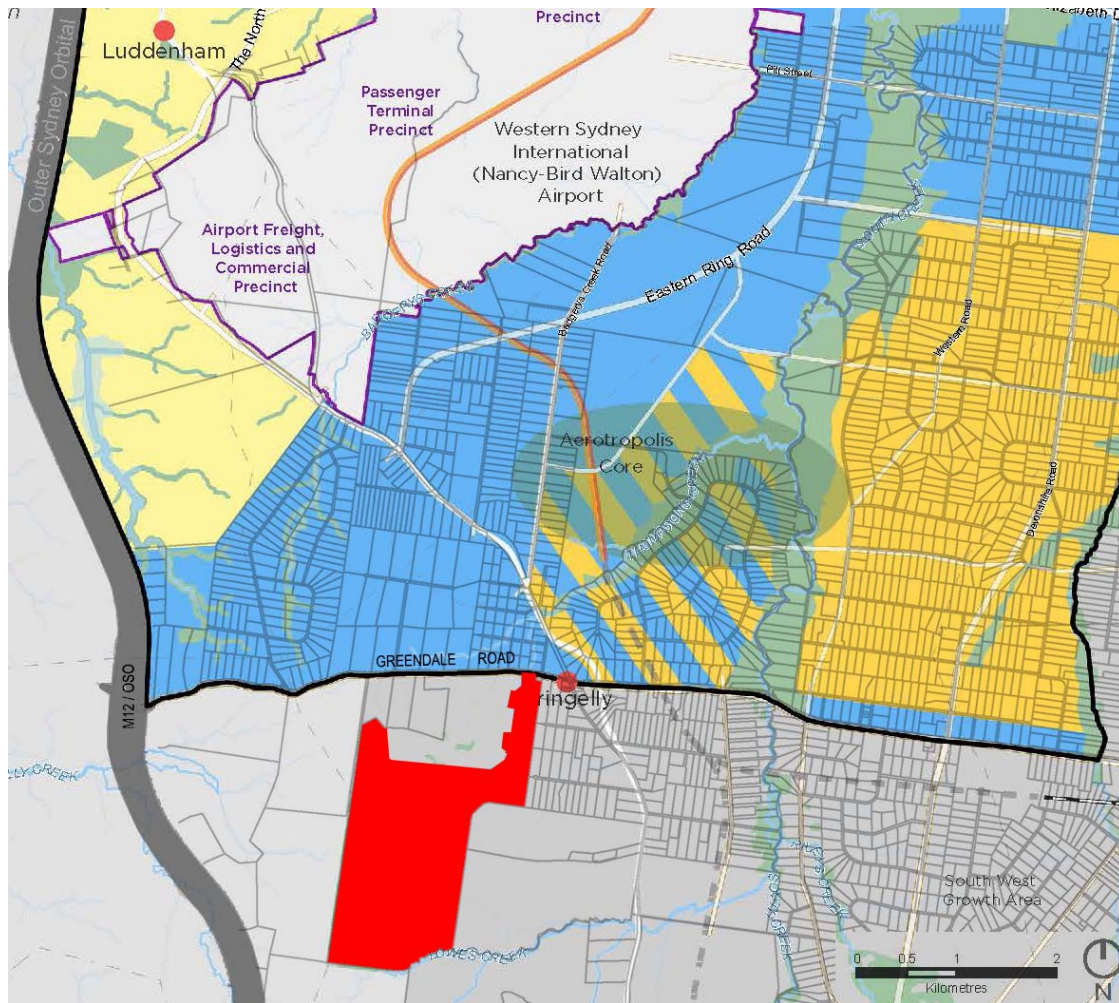
We have reviewed the draft Planning Package and have identified a number of matters of significance. These are identified with an explanation below and we request that the final Planning Package be amended to address these comments.

### **Request 1: The Dwyer Road Precinct**

That:

- 1.1 The area of strategic investigation to support the proposed land use outcome in the Dwyer Road Precinct be extended to the southern side of Greendale Road.
- 1.2 The Greendale Road Corridor be identified as an "Economic Corridor" that supports a mix of higher order commercial and other uses that befits the corridor's accessibility, its major road frontage; and that is consistent with previous considerations.
- 1.3 The planning for the Dwyer Road Precinct be accelerated.

At the outset we commend Government for amending the Dwyer Road Precinct from "Agribusiness" (as identified in the Stage 1 Land Use and Infrastructure Implementation Plan August 2018) to "Flexible Employment." This Precinct enjoys proximity to the airport and high quality access and connectivity to Western Sydney (via The Northern Road, Bringelly Road and future M9/OSO via Greendale Road). Given these attributes the highest and best use of the land is not agriculture.

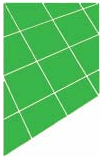


*Figure 1: Location of the site subject of this submission (indicated in red) in relation to the Aerotropolis' Dwyer Road Precinct*

Rather, rural areas in the neighbouring Camden and Wollondilly LGAs that will enjoy improved connectivity to the airport via the M9/OSO provide more appropriate locations for agribusiness. Furthermore 'agribusiness' uses align well with the land use intentions for the rural areas of these Councils as identified in their Draft Local Strategic Planning Statements (LSPSs).

We also acknowledge that the land subject to this submission falls outside the Aerotropolis Planning Package Area. However Greendale Road, that straddles the boundary between the subject site and the Dwyer Road Precinct has strategic significance in both the movement network of the Aerotropolis Planning Area and more locally in terms of the employment uses sought for the Precinct.

Most importantly, Greendale Road is intended to be one of a limited number of connections to the M9/OSO Motorway. A grade separated interchange is proposed to link the M9/OSO with Greendale Road; while the Northern Road and Bringelly Road grade separated interchange is currently under construction. It is obvious that the road has both significance and potential to play an important role as an "Economic Corridor" for the Planning Area and Precinct.



This conclusion is not new. The potential for Greendale Road (together with Bringelly Road) to perform as an “Economic Corridor” that supports a mix of higher order commercial and other uses have been identified in previous strategic planning exercises given its attributes.

It is appropriate that the land use along Greendale Road, as an economic corridor, is strategically planned on both sides of the road as part of the Planning Package. This approach will not only maximise the planning potential of the corridor, but it also offers a sound approach to town planning and economic development as it also permits identification and resolution of more fine grained issues. Such issues include intersection location (cross-precinct connectivity), urban design and the identification of strategic locations for specific major road oriented higher order land uses.

Work on the resolution of these matters in the subject site will commence in the near future when the rezoning of the site gets underway and planning for the Aerotropolis can inform and collaborate with the planning of the site.

Currently however planning for the Dwyer Road precinct is not intended to commence until “post 2020” (given it is identified as a “remaining Precinct” with no stated programme for subsequent rezoning). It would be effective to accelerate the Planning component of the Precinct release.

## **Request 2: Precinct Release**

**That:**

- 2.1 The precinct release staging and thus infrastructure sequencing be reviewed.**
- 2.2 South Creek be identified as the primary influence for an ‘Initial Precinct’ release corridor**

The programme in the plan for the staging of precincts is broad and essentially two steps: “initial’ and ‘remaining’. In a practical sense it is unlikely that the development of the Aerotropolis Planning Area will only be in two phases. Staging will ultimately be linked to the sequencing of infrastructure, particularly sewer and water lead in networks as is conventional practice for greenfield development.

However, no detail on infrastructure sequencing is provided in the Plan with the exception of some high level strategic commentary in Part 4.5 of the Plan. Given the proposed location of the “Upper South Creek Water Factory with associated Resource Recovery Plant” (p.40), and the role of South Creek in the water cycle and topographical character of the area, it is logical that South Creek will offer the corridor for a major trunk gravity sewer. This sewer will serve much of the Aerotropolis as well as the South West Growth Area south of Bringelly Road, including the site subject of this submission.

For the development of both the Aerotropolis and the South West Growth Area it is vital that the delivery of the gravity sewer in a southerly direction progressively along South Creek (upstream) is made a priority. Similarly, it is vital that the delivery of the sewer is the major influence in Precinct release and rezoning due to the broader benefits it offers Western Sydney. This approach may also, by default, include amendments to the boundaries of the precincts so that Precinct release can support and justify the investment required to sequentially construct the trunk sewer up South creek.



### Request 3:

That:

**The practicality of the objective to retain existing remnant vegetation in development areas (outside environmental areas) be reviewed.**

The Vision within the Aerotropolis Plan pursues a landscape led approach to planning (Part 2.1). This is commended and it is appropriate that sustainability be given a high priority in contemporary urban development.

However there is an inherent contradiction within the plan between the objective to reserve remnant trees within development areas and acknowledgments that other parts of the Aerotropolis require significant earthworks to accommodate large scale employment uses and buildings / structures. For example the exhibition material for the Mamre Road Precinct notes that *"The delivery of industrial land may need significant earthworks in those areas in order to modify slopes between 15% and 20%"* (p.22).

A literal application of a control of this nature would effectively restrain development or introduce significant implications for construction and affordability implications as contemporary subdivision construction often (driven by natural landform character) requires significant cut and fill to meet stringent lot, road and stormwater gradient requirements.

Furthermore, this aspect of the plan seeks the protection of trees that we assume will be in bio certified areas. As bio certification has already been conferred on much of the area (via the Growth centres SEPP) the environmental impacts of the removal of trees in these areas will have already been offset. The landowner has already provided compensation for the offset by the payment of a Special Infrastructure Contribution that includes a proportion of funding for the delivery of the Cumberland Plain Conservation Management Plan (CPCP).

### Request 4:

That:

**The intentions for the "M5 Motorway Extension Indicative Corridor" along Bringelly Road be clarified.**

The plan in the Vision for 'Proposed Transport Corridors' (unnumbered but located on Page 37) proposes a broad corridor for what appears to be an upgrade of the new (upgraded) Bringelly Road currently under construction to a Motorway standard to link the M9/OSO with the M5.

No detail or justification is provided in the Plan for this extraordinarily significant item of transport planning. In fact there is absolutely no discussion on this proposal in the Planning Package. Furthermore, this corridor was not identified in Transport for NSW's 'Protection of Transport Corridors in Western Sydney' exhibition in March 2018.

Due to the potential planning, property and amenity impacts, clarity on this matter is required as a matter of urgency. As planning moves forward in both the Aerotropolis Planning Area and the southern side of Bringelly Road in the South West Growth Area (including the subject site) certainty is of paramount importance if further delays in precinct planning are to be avoided.



Request 5:

That:

The intentions for the distance contours for the Airport "Wildlife Buffer" be clarified.

The plan in the Vision for 'Wildlife Buffers' (unnumbered but located on Page 49) requires clarification. The buffer contours extend across a large part of the Aerotropolis Planning Area as well as the South West Priority Growth Area into the site subject of this submission.

Little detail is provided in the Plan for this potentially significant influence on land use planning, built form and landscape outcomes and this has significant potential to exacerbate uncertainty. Importantly it appears it may contradict and undermine the "Landscape Led Approach" to planning that is driving the Vision for the area.

In conclusion, we welcome and support the exhibition of the Draft Planning Package by Government. It is an important milestone in the delivery of the Aerotropolis. We have made a number of requests for amendments and / or clarification and we would be happy to meet with planning staff to present our comments.

Yours faithfully,

MACARTHUR DEVELOPMENTS PTY LTD

A handwritten signature in black ink, appearing to be 'S. McMahon', with a long horizontal stroke extending to the right.

Stephen McMahon  
General Manager