

13 March 2020

Western Sydney Planning Partnership
PO Box 257
Parramatta NSW 2124

Our ref: 12524108-79843-16
Your ref:

Via: online submission

Dear Sir/Madam

Submission on the Western Sydney Aerotropolis Planning Package

Thank you for the opportunity to provide comments to the Western Sydney Planning Partnership (Planning Partnership) on the draft Western Sydney Aerotropolis Plan (WSAP), Western Sydney Aerotropolis Development Control Plan 2019 and Western Sydney Aerotropolis Discussion Paper on the proposed State Environmental Planning Policy.

█ has been engaged by our client █ to prepare this submission on its behalf.

█ is in the planning stage of a proposal to construct and operate a 'waste and resource management facility' at █ Kemps Creek (the site, as shown in **Figure 1**). The site is within the Western Sydney Aerotropolis and is currently zoned RU4 Primary Production Small Lots under the *Penrith Local Environmental Plan 2010*. The site is also within the area to which the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* applies and is 'unzoned land' meaning development of the site relies on Clause 12 of the WSEA SEPP to lawfully undertake employment-generating development.

█ notes that the draft WSAP includes planning objectives and principles for the Aerotropolis, permissible land uses for each of the ten (10) precincts and the sequence that precincts will be developed, with reference given to 'initial precincts' and 'non-initial precincts', reflecting the NSW Government's program to undertake precinct planning.

The initial precincts are the first precincts to be developed over the coming years and include the following six precincts: the Aerotropolis Core, Northern Gateway, Wianamatta-South Creek Precinct, Badgery's Creek Precinct, Mamre Road Precinct and the Agribusiness Precinct. █ understands that the Planning Partnership has the responsibility for delivering the Final Plan and Precinct Plans within the Western Sydney Aerotropolis to the Minister for Planning and Public Spaces.

The site is located within the Kemps Creek Precinct which is a non-initial precinct. The Draft WSAP identifies Kemps Creek Precinct as a precinct which will '...create opportunities for flexible employment development connected to residential communities in the south, Aerotropolis Core, the Airport and other centres such as the Liverpool CBD.'

On behalf of our client, we request that the Planning Partnership reconsider the nomination of Kemps Creek Precinct (and in particular, the land north of Elizabeth Drive) as an 'initial precinct' for the following reasons:



- **Waste service hub:** Within the Kemps Creek Precinct there is an existing precinct of waste management facilities including:
 - Brandown Quarries - Lot 90 Elizabeth Dr, Kemps Creek - Resource Recovery Centre, General Solid Waste (Non Putrescible) Landfill and Quarry (1.7 km east)
 - Waste Management by Resource Environmental Solutions – 16-23 Clifton Ave, Kemps Creek (20 m west)
 - Hi-Quality Group - 1513-1519 Elizabeth Dr, Kemps Creek (250 m west)

There are benefits in co-locating a number of waste management facilities in a specific area, rather than having them widely dispersed. Close proximity means that it is convenient for waste materials or by-products to be transferred between facilities for specialised processing. In this case, it also reduces the possibility of such facilities being located close to residential areas, or sensitive environmental receptors.

The proposed plastic waste processing facility would receive PET wastes, remove labels and caps, sort by colour, clean and shred the PET into flakes. In addition, it is proposed to turn the flakes into polyester fibre and cloth on site, using leading edge, high technology processes. Processing of other waste plastics on site is also being investigated.

Having regard to the above, the proposal is complimentary with adjoining land uses.

- **No major infrastructure upgrades required:** The existing road infrastructure accessing the site, in particular Clifton Avenue which links directly with Elizabeth Drive, the main east-west corridor between Liverpool and surrounding suburbs, is adequate and has the capacity to service the proposed waste management facility. The Kemps Creek Precinct (and in particular, the land north of Elizabeth Drive) is readily accessed by the regional road network, including both the M4 and M7 motorways.
- **Demand for waste management facilities** –The Western Sydney Airport and associated Aerotropolis will utilise local waste management facilities to dispose of wastes generated, rather than having on site recycling and waste processing facilities. The proposed facility will be suitable for receiving plastic wastes during the long term construction period associated with these facilities, as well as commercial and industrial wastes generated during operations.
- **Orderly and economic development of land:** There is the potential, should the land in the Kemps Creek precinct north of Elizabeth Drive be delayed from the initial precinct, that the ‘orderly and economic development’ of land, consistent with the objects of the *Environmental Planning and Assessment Act, 1979* will not take place. The reason being that the land is surrounded on all sides by the Wianamatta-South Creek fast track initial precinct (to the north, east and west) and Elizabeth Drive to the south. If the Kemps Creek precinct north of Elizabeth Drive is left in isolation, the delay in rezoning could hinder the momentum of development for the broader locality, preventing the timely delivery of employment-generating development. Further, it is noted that land further to the north (on the northern side of Mamre Road) is being fast tracked as the Mamre Road industrial Precinct.
- **Land use efficiency:** Fast tracking the Kemps Creek precinct north of Elizabeth Drive supports the early success of the broader Aerotropolis, through facilitating the development of land for medium

term uses that, over time can evolve and intensify in to higher order uses as the broader precinct evolves and matures.

Our client has been planning the development of the site since June 2019 and has undertaken advanced commercial negotiations with the land-owner, who is supportive of the proposal. Our client intends to meet with Penrith City Council at the earliest opportunity to brief them about this proposal.

We believe that this waste and resource management facility proposal is consistent with the proposed objectives of the Kemps Creek precinct, and will *'create opportunities for flexible employment development connected to residential communities in the south, Aerotropolis Core, the Airport and other centres such as the Liverpool CBD.'*

Thank you for the opportunity to provide a submission to the Western Sydney Aerotropolis Planning Package.

Aunano looks forward to working with the Planning Partnership to deliver its vision for the Western Sydney Aerotropolis and would welcome any further opportunities to contribute to the Kemps Creek precinct plan finalisation.

Sincerely

[Redacted signature block]



Paper Size ISO A4
0 10 20 30 40
Metres



Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 56



Site location

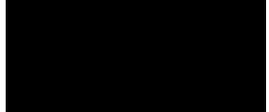


FIGURE 1



Data source: public domain