

[REDACTED]

From: system@accelo.com on behalf of Robert Chambers
Sent: Friday, 2 November 2018 12:12 PM
To: [REDACTED]
Subject: Submission Details for company BBC Consulting Planners Pty Ltd (org_comments)
Attachments: 291993_FIGURES LRES.pdf; 291993_L-DoPE-Aerotropolis-181102-Final.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Robert Chambers

Organisation: BBC Consulting Planners Pty Ltd [REDACTED]

Govt. Agency: No

Email: [REDACTED]

Address:
[REDACTED]
[REDACTED]

Content:

Please see attached my submission and figures.

IP Address: - 103.60.216.6

Submission: Online Submission from company BBC Consulting Planners Pty Ltd (org_comments)

https://majorprojects.accelo.com/?action=view_activity&id=291993

Submission for Job: #9552

https://majorprojects.accelo.com/?action=view_job&id=9552

Site: #0

https://majorprojects.accelo.com/?action=view_site&id=0

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2 November 2018

RJC:18-156A

Director, Aerotropolis Activation
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Aerotropolis Activation Team

Dear Madam,

Re: Western Sydney Aerotropolis: Draft – Stage 1 Initial Precinct Land Use and Infrastructure Implementation Plan (“LUIIP”);

[REDACTED]

We write on behalf of the owners of the Property in relation to the exhibited LUIIP.

[REDACTED]

- [REDACTED]
- [REDACTED]

The Property is located on the [REDACTED] and on [REDACTED]. The boundaries and configuration of the [REDACTED]. The Property has an [REDACTED].

The Property is occupied and used by a mix of businesses in the earthworks, integrated natural resource and recycled products sector which form part of the Hi Quality Group which specialises in transport, logistics and plant hire, civil and environmental services, quarrying, resource recovery and recycling, waste management and landfill, building and landscaping product supplies, skip bins, construction site cleaning and property development.



The Property comprises buildings, workshops, reception, offices, storage bins and compounds, plant, customer parking, staff parking, truck parking and associated heavy vehicle manoeuvring areas, all generally as shown on the 2018 aerial photograph in **Figure 3A**.

Figure 3A shows the relationship of the Property to surrounding land.

The current statutory planning regime applying to the Property can be summarized as follows:-

- pursuant to SEPP (Western Sydney Employment Area) 2009 ("the WSEA SEPP") the Property forms part of the land to which the Land Application Map applies (see **Figure 4A**), but as yet the Property has not been released/ rezoned for industrial/ employment purposes (see **Figures 4B and 4D**) – this future employment land is shown as the "Broader WSEA"; and
- pursuant to Penrith LEP 2010, the Property is zoned RU4 Primary Production Small Lots (see **Figure 5A**), is subject to a minimum lot size of 2 ha (see **Figure 5B**) and is identified as land with scenic and landscape values (see **Figure 5C**).

The intent of the WSEA SEPP is that land in the Broader WSEA be rezoned for employment/ industrial purposes as a south westerly extension of the WSEA.

This planned future expansion of the WSEA was identified in "A Plan for Growing Sydney, 2014" (see **Figure 6**). Similarly, the Draft Western Sydney Airport EIS (2015) identified the Property as part of the WSEA Priority Land Release Area (see **Figure 7**), the M12 Motorway Community Update – February 2018 (see **Figure 8**) identifies the property and surrounding land as part of the Western Sydney Airport Growth Area (albeit affected by the planned M12 alignment), the Western Sydney Infrastructure Plan (2017) identified the Property as part of the Western Sydney Priority Growth Area (see **Figure 9**), and the Western City District Plan released in March 2018 identifies the Property as part of the WSEA (see **Figure 10**).

As is evident from all the above, the strategic planning intent for the Property has consistently been (and remains) that it form part of the employment and job generating land contained within the Broader WSEA.

This unambiguous, consistent and logical strategic planning framework is, however, not reflected in the LUIIP, pursuant to the maps associated with which the Property is in the Western Sydney Aerotropolis on some and outside it on others (see **Figures 11A - 11J**).

The Property is shown on the "Initial Precincts Map" in the LUIIP as being within the eastern part of the "Kemps Creek Precinct" (see **Figure 11A**), the "Kemps Creek Precinct" being divided in two by that part of the "South Creek Precinct" which follows the course of Kemps Creek.



On the "Structure Plan Map" in the LUIP, the Property is outside the boundary of the eastern part of the "Kemps Creek Precinct" (see **Figure 11B**) and thus not identified as "Flexible Employment Land". Similarly, on the "Precinct Map" in the LUIP, the Property is shown outside the boundaries of the "Kemps Creek Precinct" (see **Figure 11C**). On the "Connected Corridors Map" (see **Figure 11D**) the Property is back within the Aerotropolis boundary, as it is on the "ANEC/ ANEF Contours Map" (see **Figure 11E**), the "OLS Clart" (see **Figure 11F**), the "Potential Transport Corridors Map" (see **Figure 11G**), the "South Creek Catchment Map" (see **Figure 11H**), the "Conservation Value Map" (see **Figure 11I**) and the "Future Transport Initiatives Map" (see **Figure 11J**).

It is evident from the above that the Property is meant to be in the Aerotropolis and appears to have been excluded from it on the Structure Plan Map (see **Figure 11B**) because of the diagrammatic indication of the M12 Corridor which is in the order of 500m wide. This is around five (5) times the width of the likely actual corridor once determined. The Structure Plan Map should be made more precise to show Flexible Employment Land on the Property either side of the M12 Corridor.

In addition to the uncertainties caused by the above-described mapping in the LUIP, the LUIP also: -

- establishes Precinct boundaries based on the PMF which is inconsistent with established NSW Government policy for flood affected land – this has the effect of reducing the extent of the Broader WSEA land to the east of the "South Creek Precinct" (along the alignment of Kemps Creek) thereby reducing the extent of a viable future industrial/ employment land sub-precinct in the area bounded in Mamre Road, Elizabeth Drive and Kemps Creek;
- suggests future zonings which are not drawn from the Standard Instrument, thus creating significant uncertainty as to what land uses will/ will not be permissible in the future;
- defers to a later stage the release of employment land in the "Kemps Creek Precinct"; and
- because of all of the above, undermines the strategic intent of the Western City District Plan and the WSEA SEPP for the Broader WSEA area.

Submission

- A. It is essential that the LUIP Maps deal with the Property consistently: it should be shown as being included in all of the Aerotropolis maps;
- B. The Structure Plan Map should be made more precise to show the Property as Flexible Employment Land either side of the M12 Corridor: the M12 Corridor is shown as around 500m wide which is excessive;



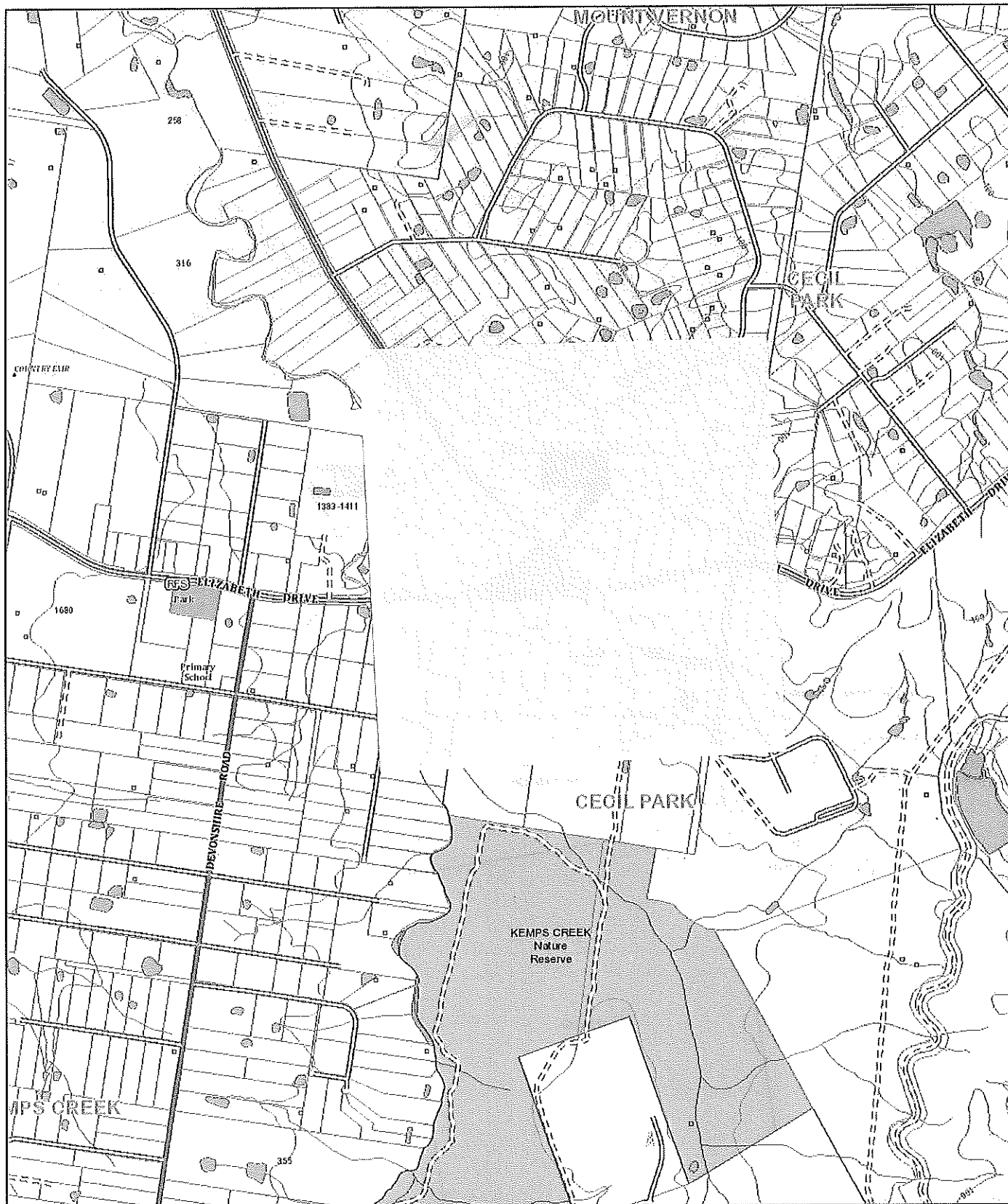
- C. The LUIIP does not explain how the long-standing and recently reinforced (by the Western City District Plan in March 2018) strategic planning intent for the Broader WSEA to provide essential employment and job generating land will be maintained and delivered insofar as the area to the north of Elizabeth Drive and to the west of Mamre Road (in which area the Property is located) is concerned;
- D. No diminution of the long-standing and recently re-inforced strategic planning intent for the Broader WSEA should be contemplated or facilitated by the LUIIP;
- E. No new controls should be introduced which prevent the continuation and expansion of the lawful use of the Property.

Thank you for the opportunity to make this submission

Yours faithfully
BBC Consulting Planners

[Redacted signature block]

Robert Chambers
Director
Email [Redacted]



Source: <http://maps.six.nsw.gov.au>



0 1km

LUIP SUBMISSION

FIGURE 1
Location

Prepared For - Beatty Legal





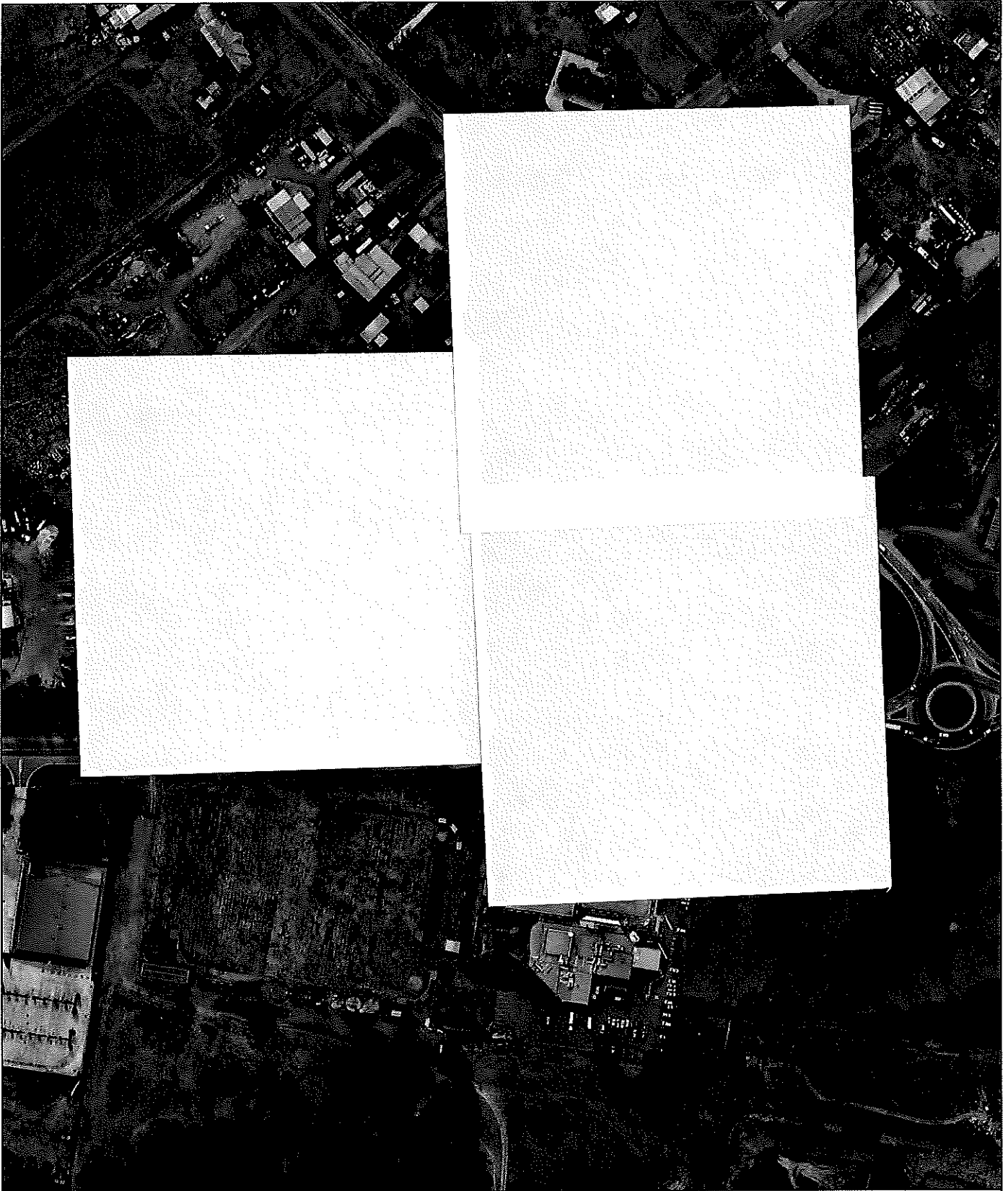
Source: <http://maps.six.nsw.gov.au>

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FIGURE 2
Site

Prepared For - Beatty Legal

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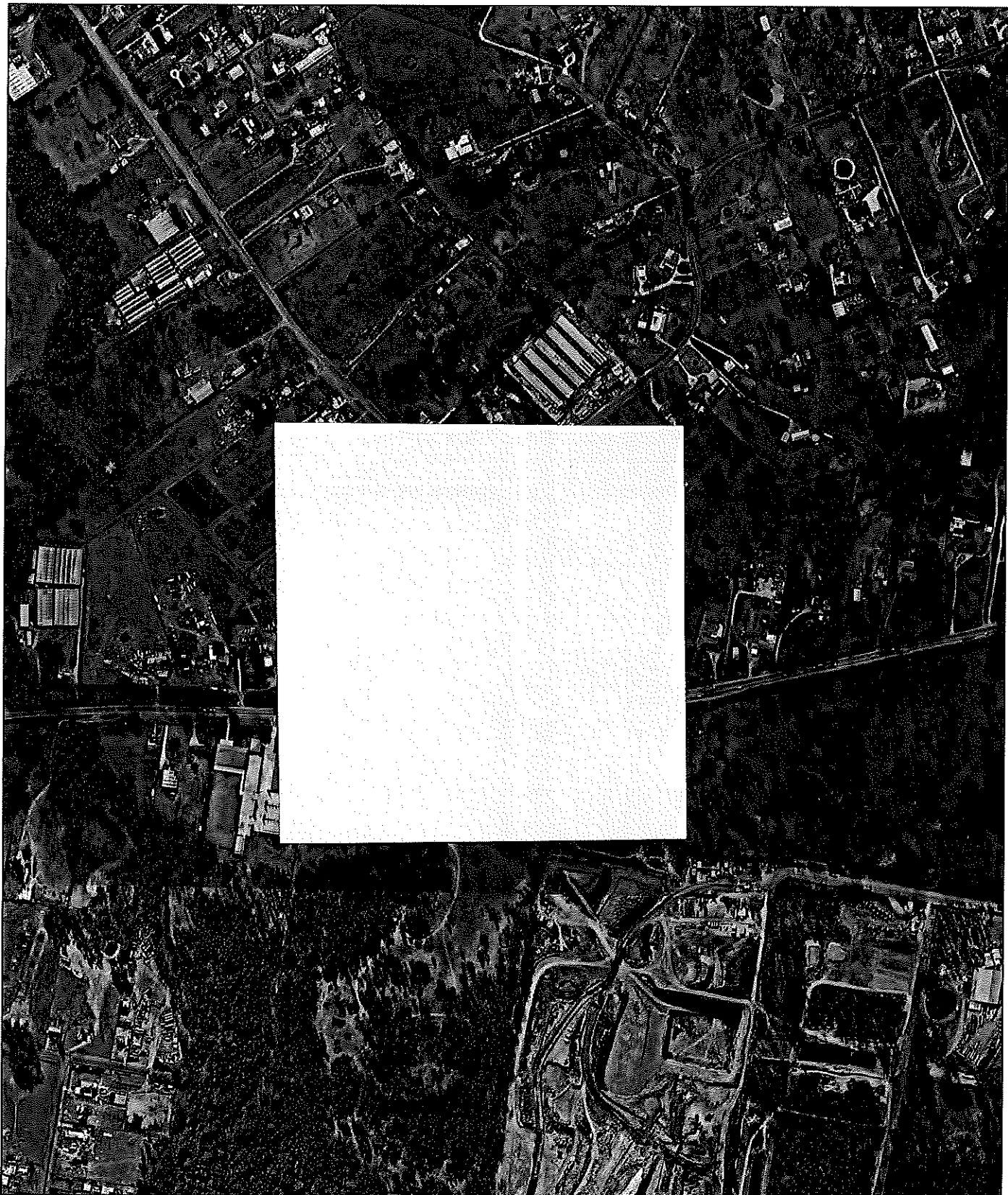
Source: NearMap 2018

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FIGURE 3A
Aerial Photo - Detail

Prepared For - Beatty Legal





Source: NearMap 2018


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FIGURE 3B
Aerial Photo - Wider Area

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 Subject Land

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FIGURE 4A
Land Application Map - SEPP (Western Sydney Employment Area) 2009

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 Subject Land

Zone

 Environmental Conservation

 General Industrial

 Light Industrial

 Infrastructure

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FIGURE 4B
Land Zoning Map - SEPP (Western Sydney Employment Area) 2009

Prepared For - Beatty Legal



-  Subject Land
-  Industrial Release Area

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FIGURE 4D
Industrial Release Area Map - SEPP (Western Sydney Employment Area) 2009

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Infrastructure

■ ■ Proposed Road

□ Subject Land

Existing Road

— Major

↔ Motorway

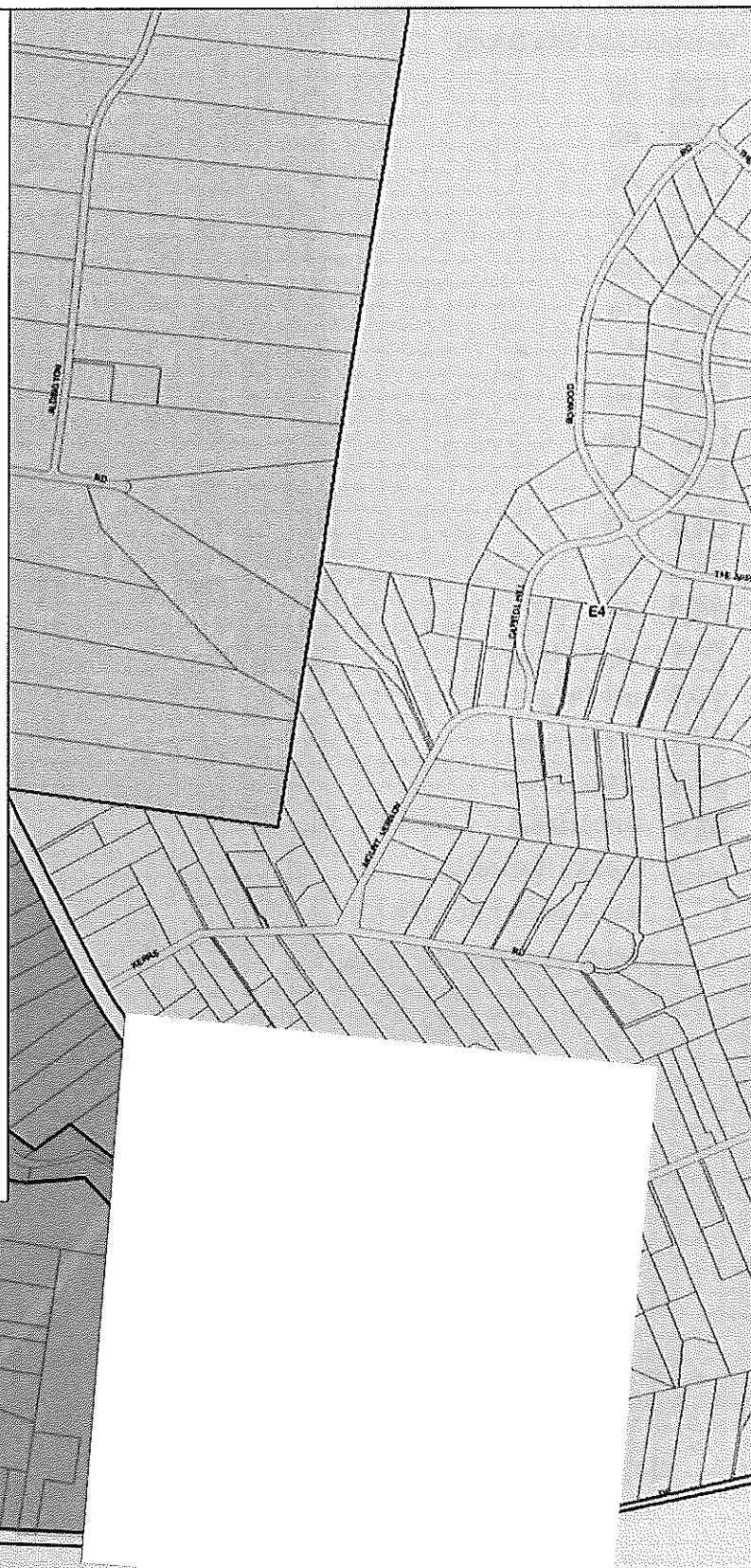
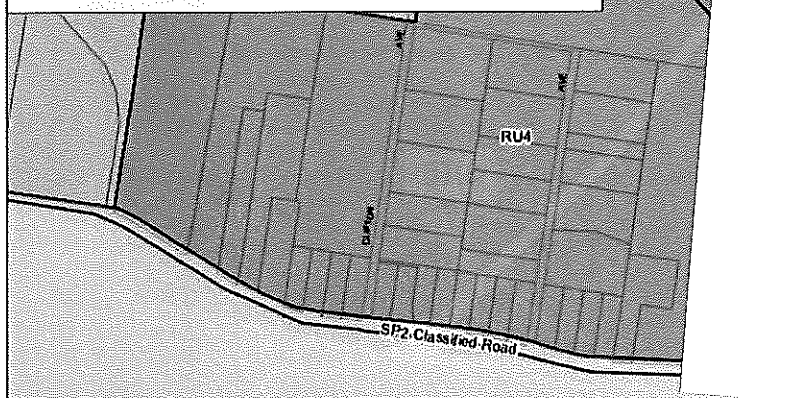
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FIGURE 4F
Transport and Arterial Road Infrastructure Plan Map - SEPP (Western Sydney Employment Area) 2009

Prepared For - Beatty Legal

Zone

B1	Neighbourhood Centre
B2	Local Centre
B3	Commercial Core
B4	Mixed Use
B5	Business development
B6	Enterprise Corridor
E1	National Parks and Nature Reserves
E2	Environmental Conservation
E3	Environmental Management
E4	Environmental Living
IN1	General Industrial
IN2	Light Industrial
R1	General Residential
R2	Low Density Residential
R3	Medium Density Residential
R4	High Density Residential
R5	Large Lot Residential
RE1	Public Recreation
RE2	Private Recreation
RU1	Primary Production
RU2	Rural Landscape
RU4	Primary Production Small Lots
RU5	Village
SP1	Special Activities
SP2	Infrastructure
SP3	Tourist
W1	Natural Waterways
W2	Recreational Waterways
DM	Deferred Matter
WSEA	SEPP (Western Sydney Employment Area) 2009
SM	SREP No. 30 - St Marys



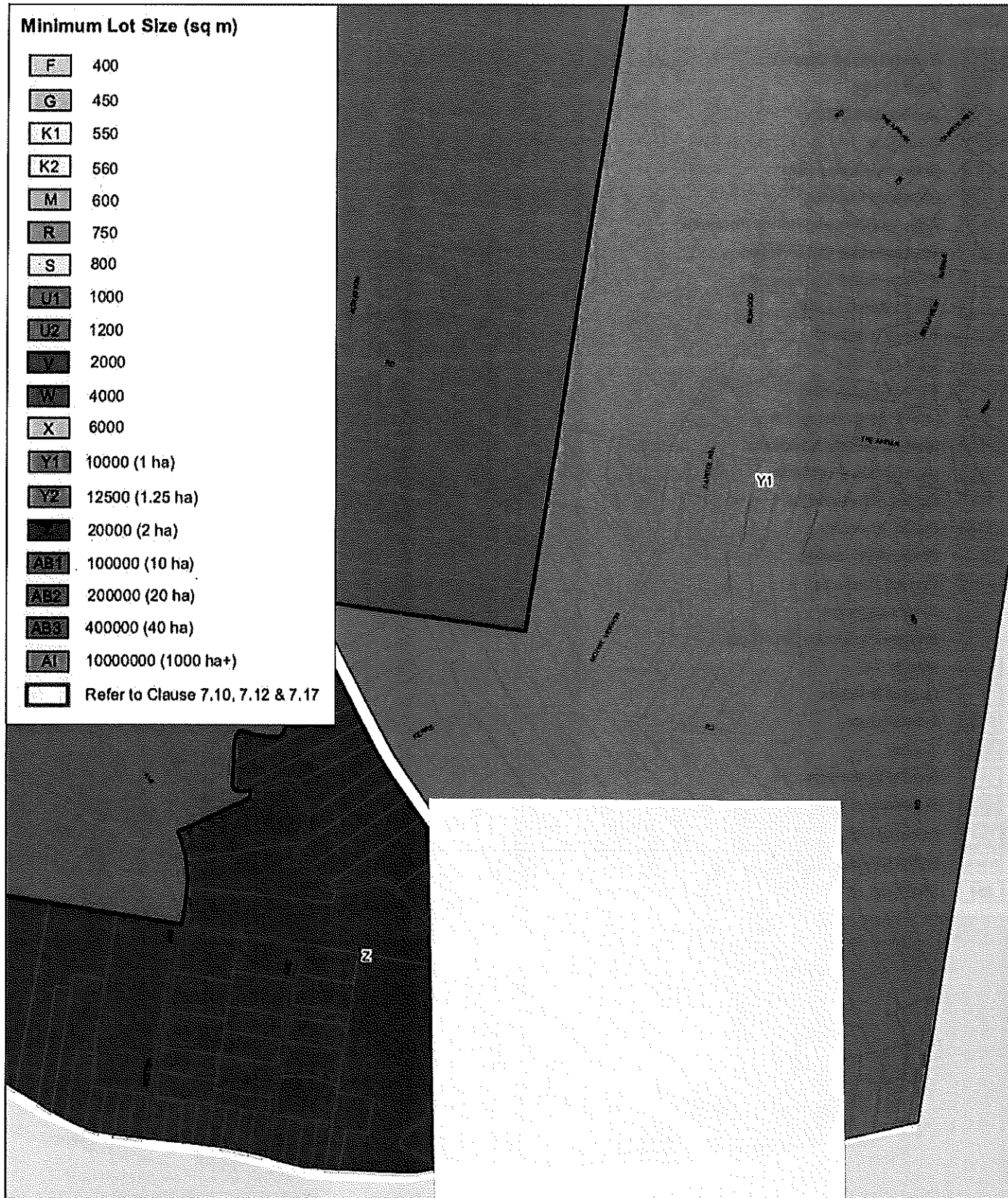
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FIGURE 5A
Zoning Map - Penrith LEP 2010

Prepared For - Beatty Legal

Minimum Lot Size (sq m)

F	400
G	450
K1	550
K2	560
M	600
R	750
S	800
U1	1000
U2	1200
V	2000
W	4000
X	6000
Y1	10000 (1 ha)
Y2	12500 (1.25 ha)
	20000 (2 ha)
AB1	100000 (10 ha)
AB2	200000 (20 ha)
AB3	400000 (40 ha)
AI	1000000 (1000 ha+)
	Refer to Clause 7.10, 7.12 & 7.17



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FIGURE 5B
Lot Size Map - Penrith LEP 2010

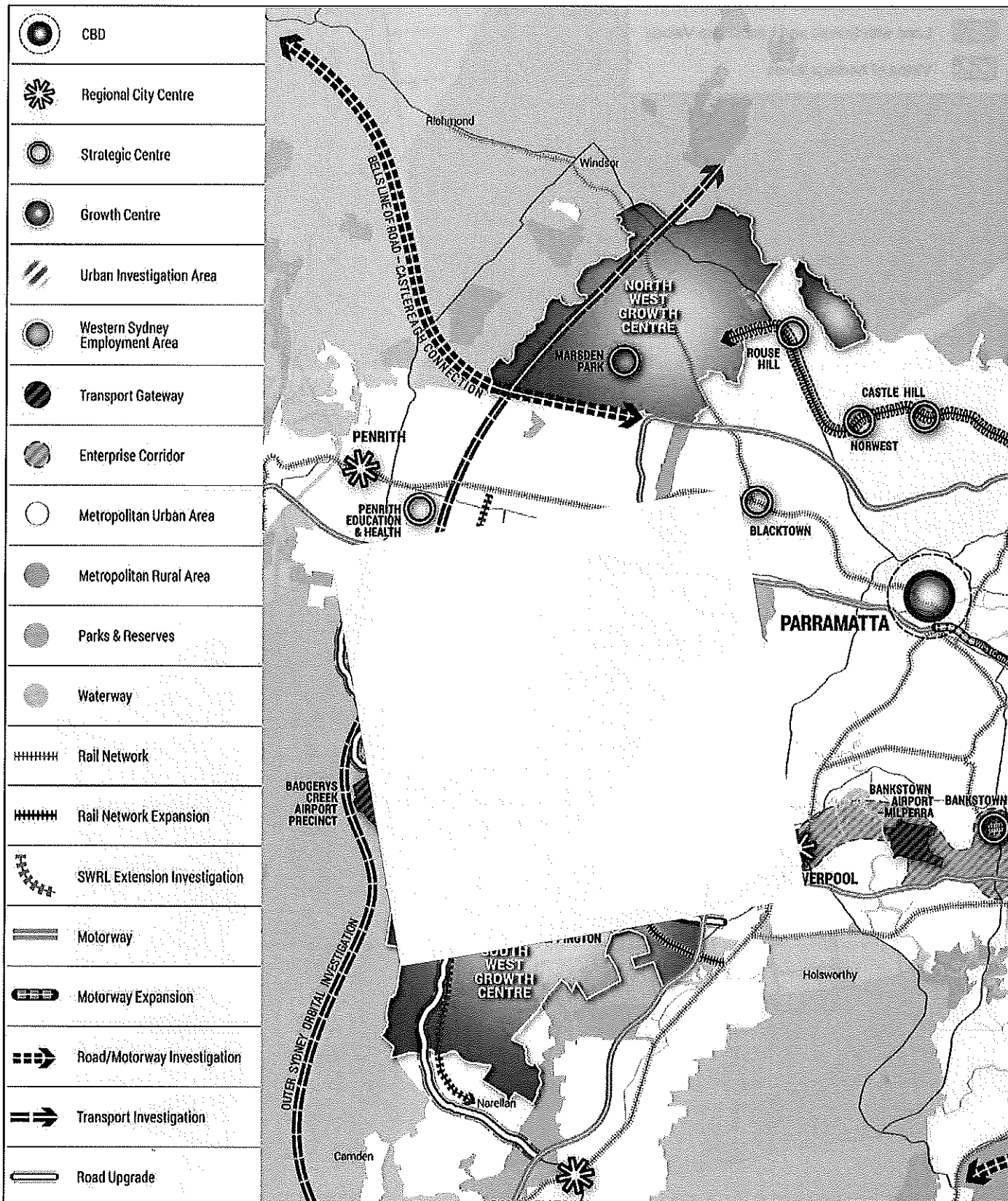
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FIGURE 5C
Scenic and Landscape Values Map - Penrith LEP 2010

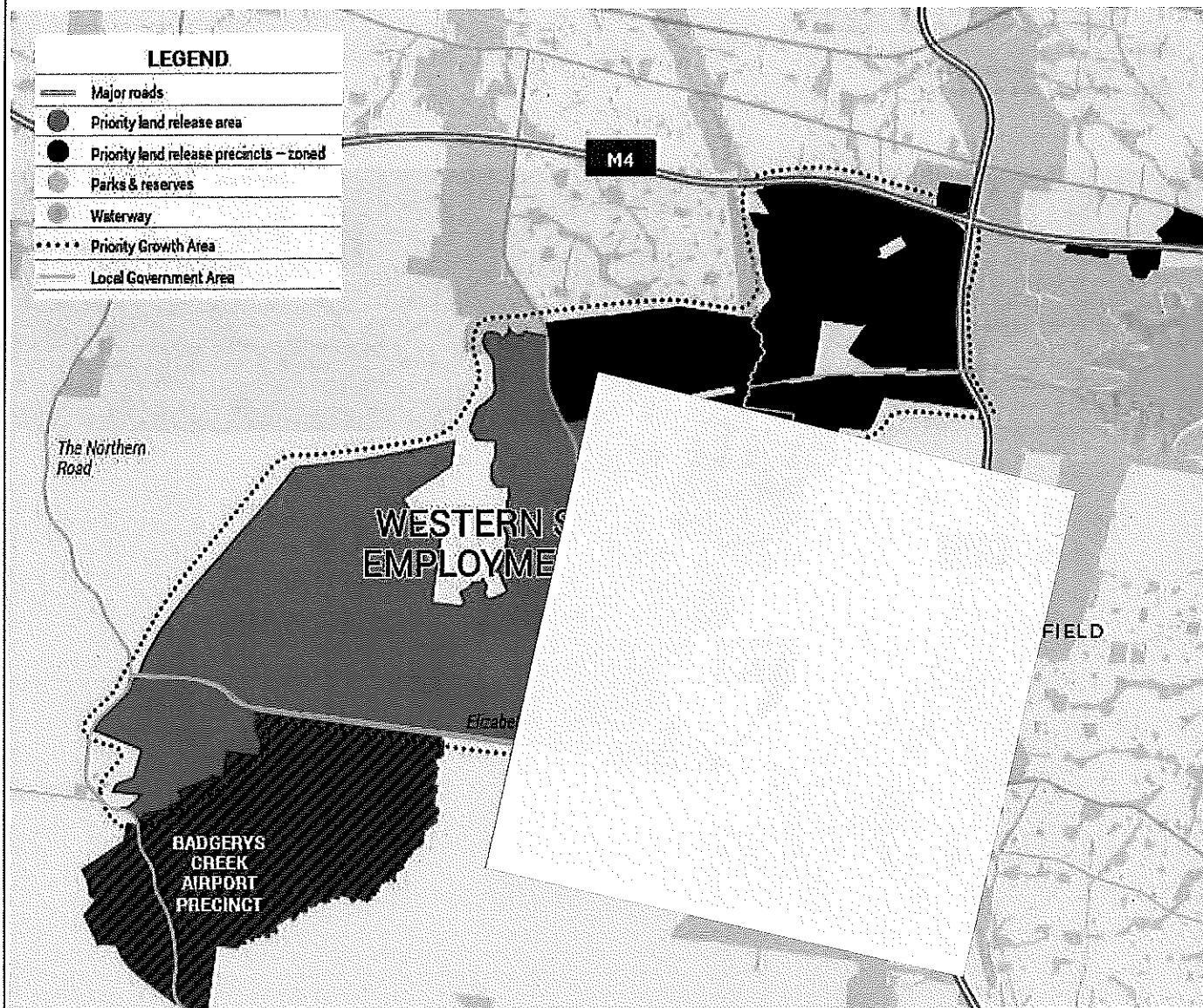
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FIGURE 6
Connecting Western Sydney's Population Growth Jobs – A Plan for Growing Sydney 2014

Prepared For - Beatty Legal











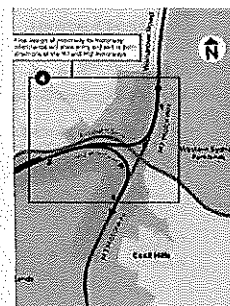
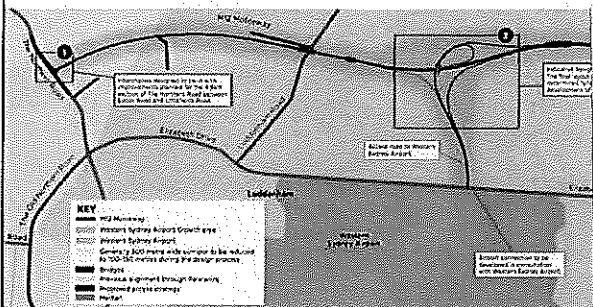
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FIGURE 7
Western Sydney Employment Area (DP&E) - Draft Western Sydney Airport EIS October 2015

Prepared For - Beatty Legal

KEY

-  M12 Motorway
-  Western Sydney Airport Growth area
-  Western Sydney Airport
-  Generally 300 metre wide corridor to be reduced to 100-150 metres during the design process
-  Bridges
-  Previous alignment through Parklands
-  Proposed access strategy
-  Median

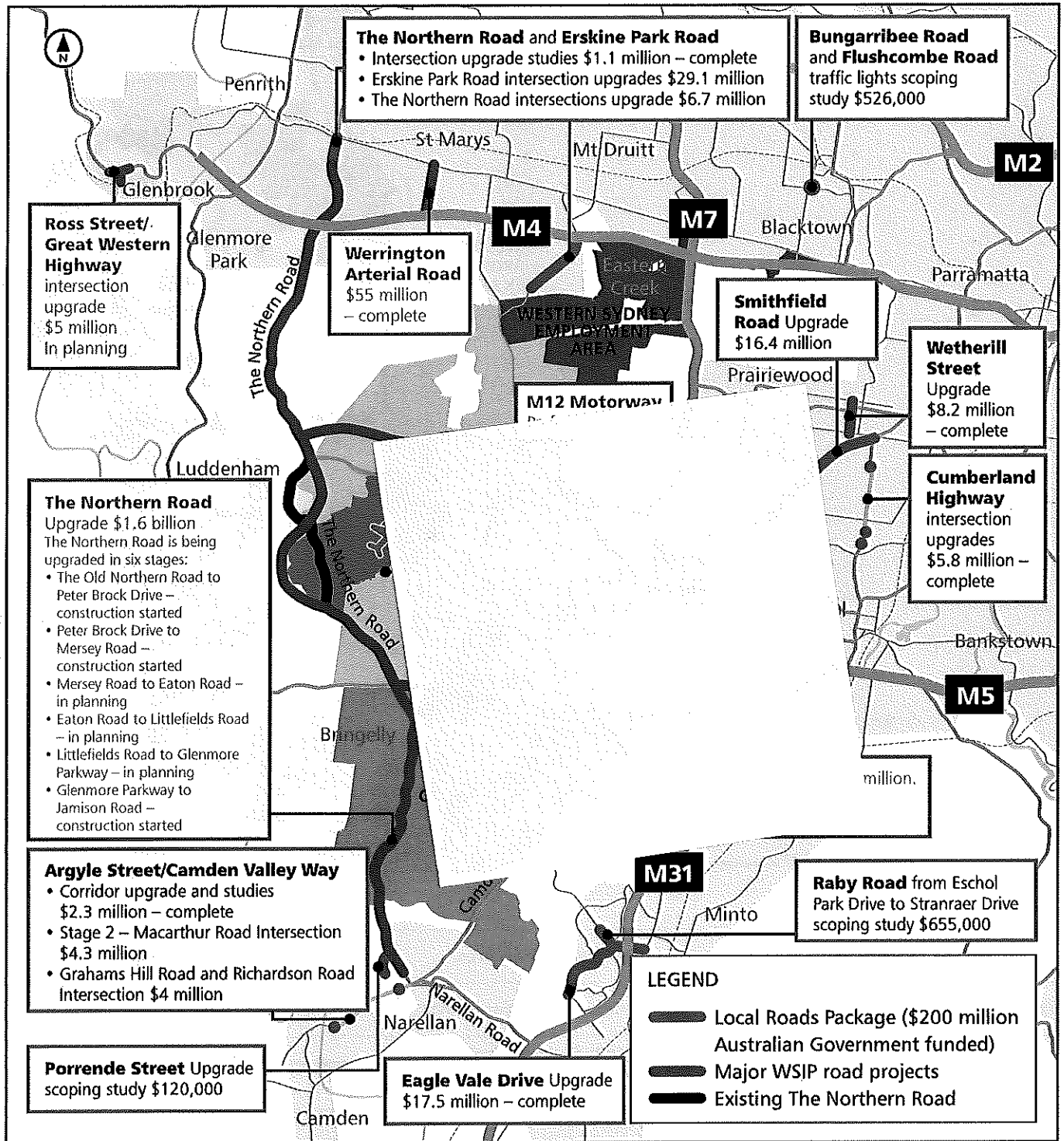


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FIGURE 8
M12 Motorway Community Update - February 2018

Prepared For - Beatty Legal

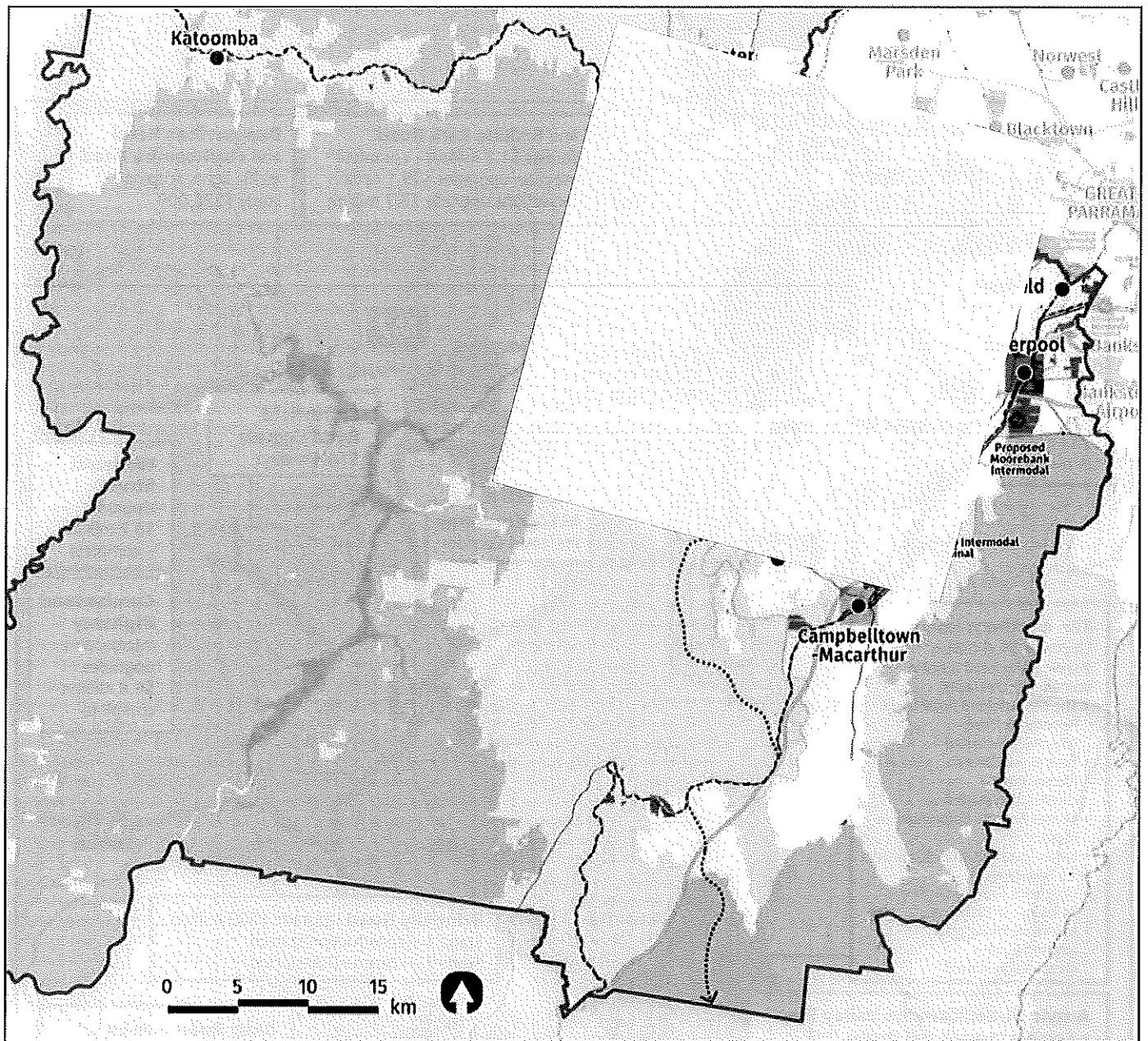




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FIGURE 9
Western Sydney Infrastructure Plan Map June 2017

Prepared For - Beatty Legal

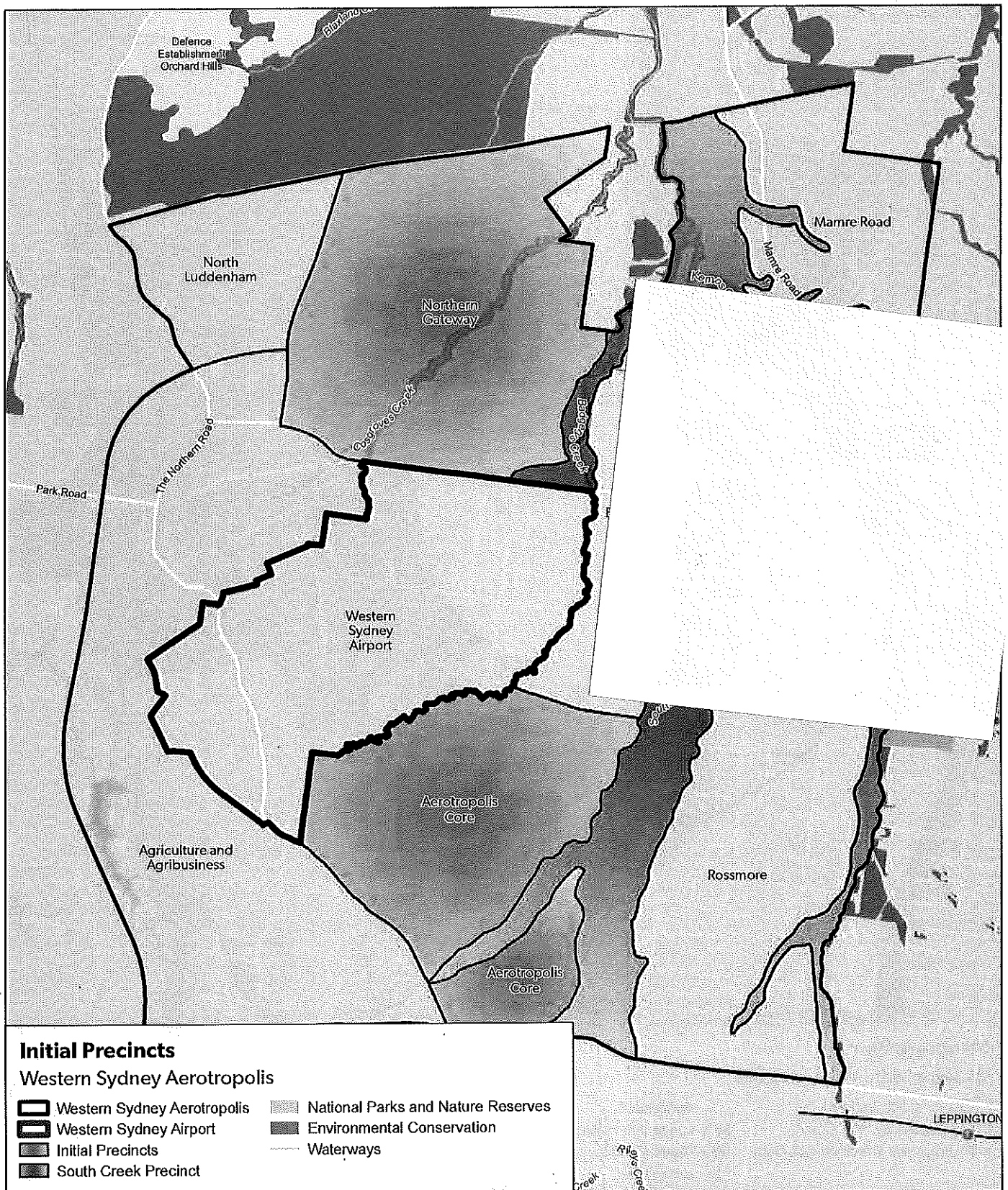


— District Boundary	● Metropolitan Rural Area	... Freight Rail Investigation
● Metropolitan Cluster	● Industrial and Urban Services Land	○ Urban Area
● Strategic Centre	▨ Potential Future Industrial/ Employment Land	—●— Train Station
● Waterways	— Freight Rail	== Motorway
● Protected Natural Areas	— Shared Rail	— Road

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FIGURE 10
Western City District Industrial and Urban Services Land and Freight Assets - Western City District Plan, March 2018

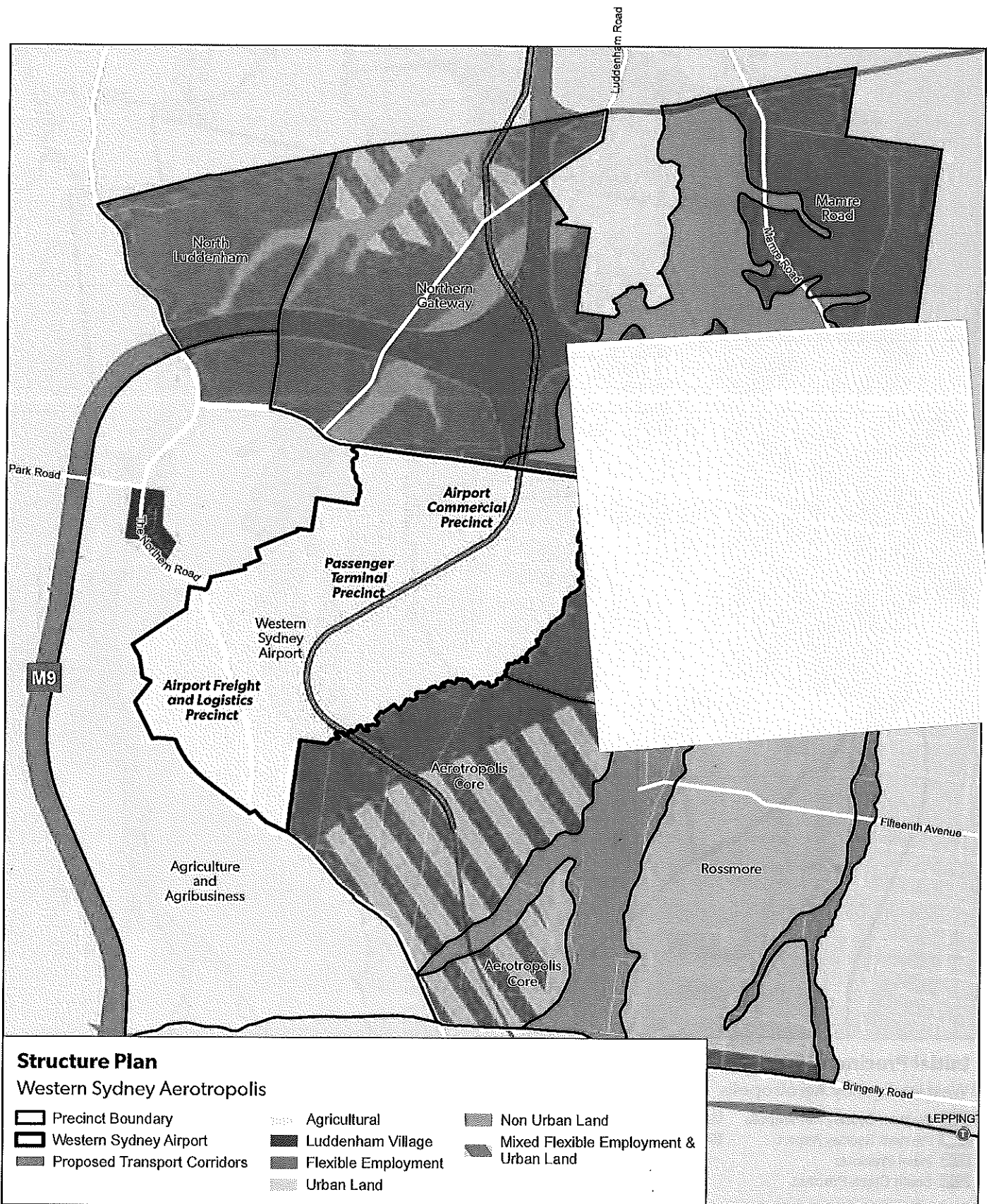
Prepared For - Beatty Legal



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FIGURE 11A
Initial Precincts - Western Sydney Aerotropolis, Land Use and Infrastructure Implementation Plan

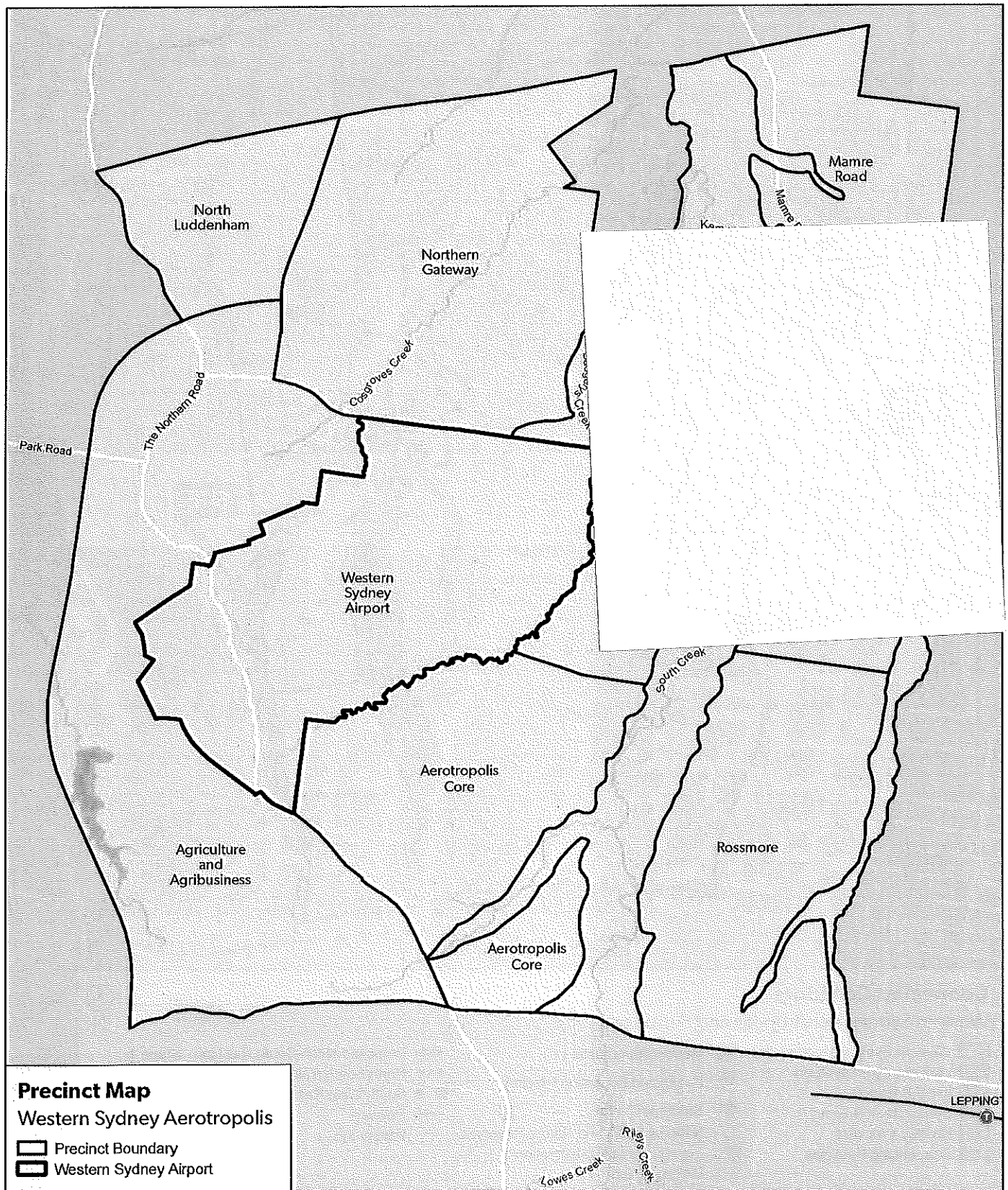
Prepared For - King & Wood Mallesons



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FIGURE 11B
Structure Plan - Western Sydney Aerotropolis, Land Use and Infrastructure Implementation Plan

Prepared For - King & Wood Mallesons



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FIGURE 11C
Precinct Map - Western Sydney Aerotropolis, Land Use and Infrastructure Implementation Plan

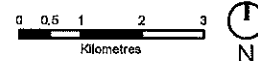
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Connected Corridors

Western Sydney Aerotropolis and Surrounds

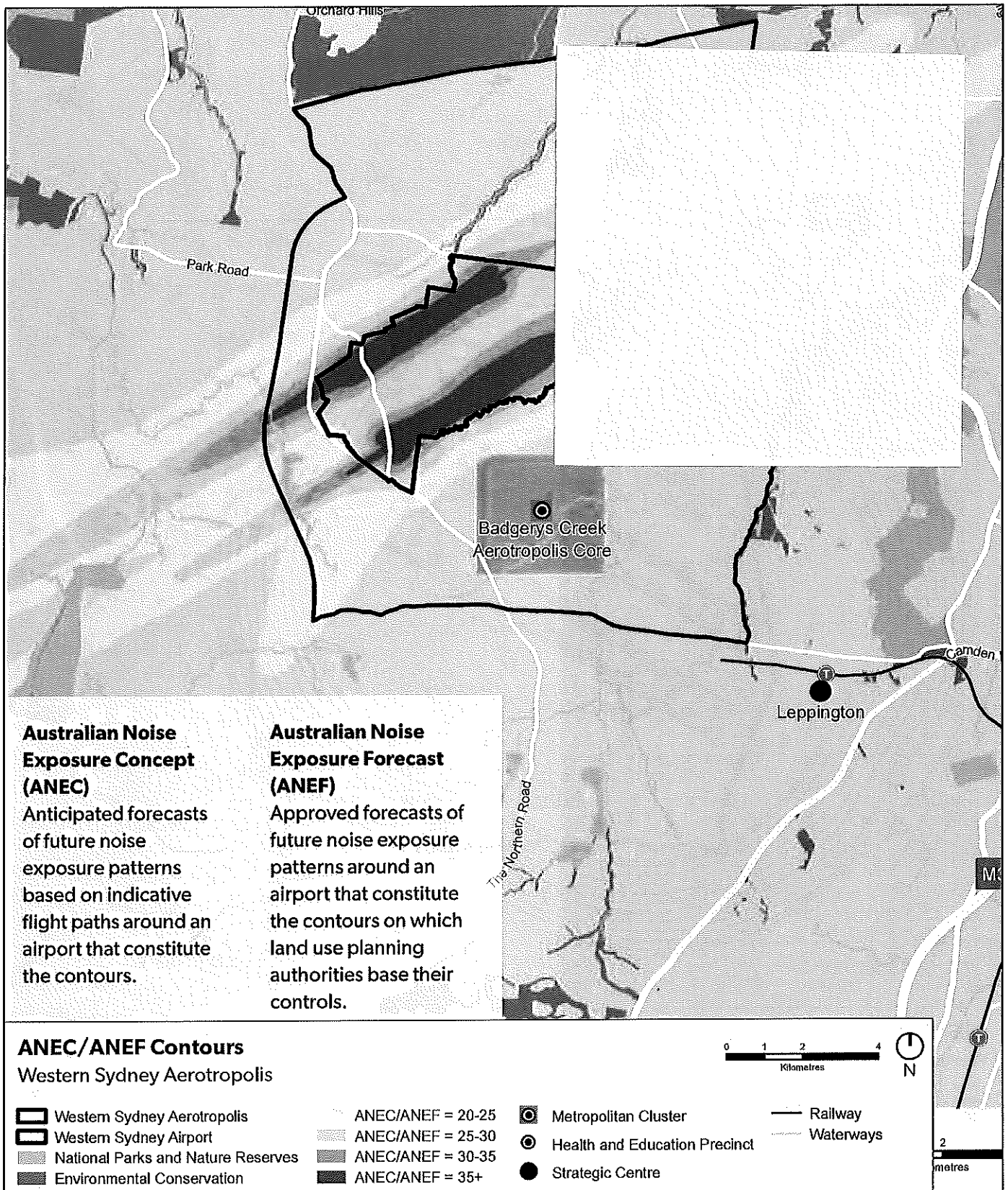
- | | | |
|-----------------------------|------------------------------------|------------------------------------------|
| Western Sydney Aerotropolis | Metropolitan Cluster | Proposed North South Rail Link - Stage 1 |
| Western Sydney Airport | Health and Education Precinct | North South Rail Link - Future Stages |
| Initial Precincts | Strategic Centre | South West Rail Link Potential Extension |
| South Creek Precinct | National Parks and Nature Reserves | Railway |
| Related Precincts | Environmental Conservation | Waterways |
| Surrounding Precincts | Defence Land | |



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FIGURE 11D
Connected Corridors - Western Sydney Aerotropolis, Land Use and Infrastructure Implementation Plan

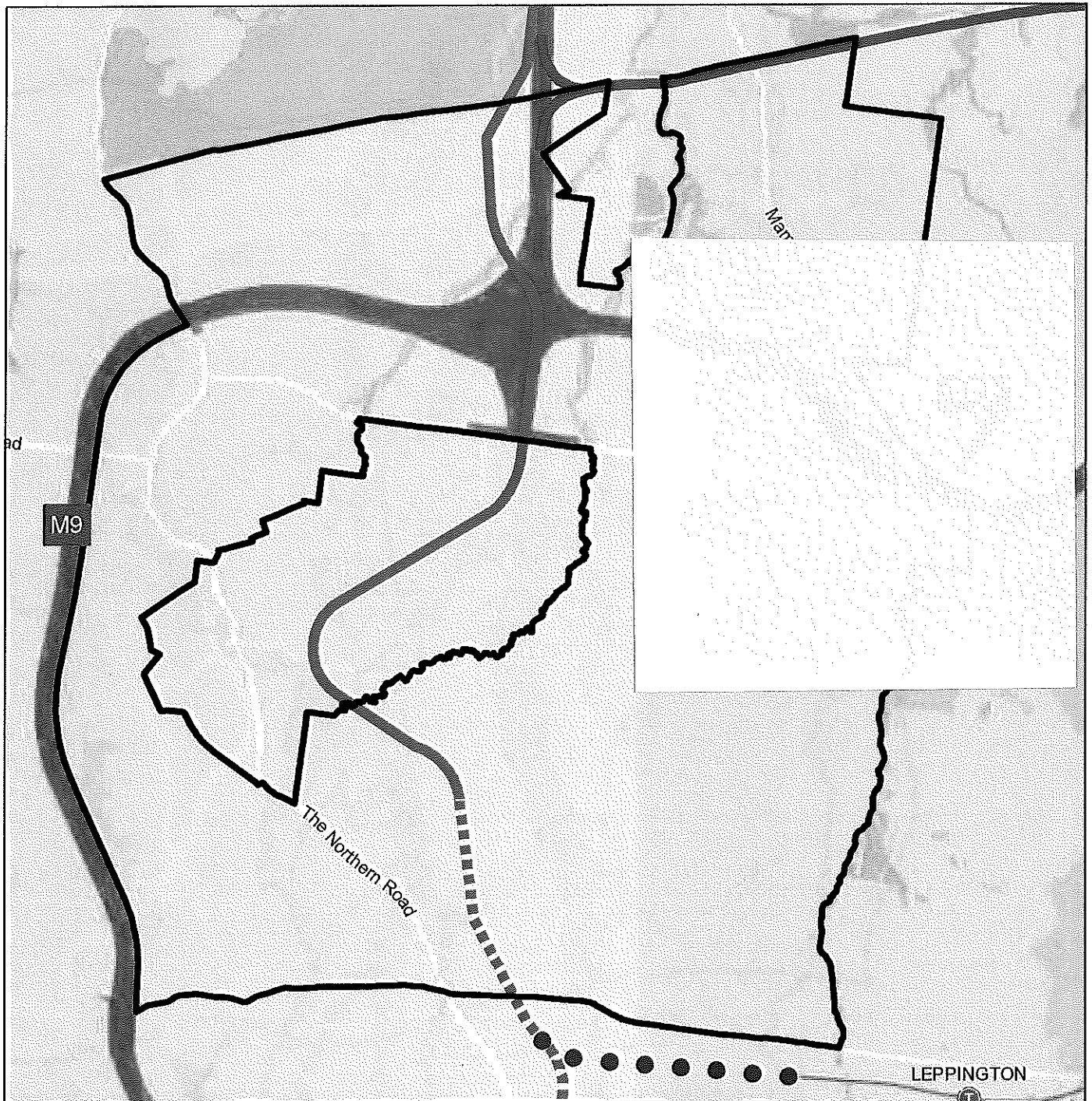
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FIGURE 11E
ANEC/ANEF Contours - Western Sydney Aerotropolis, Land Use and Infrastructure Implementation Plan

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Potential Transport Corridors

Western Sydney Aerotropolis

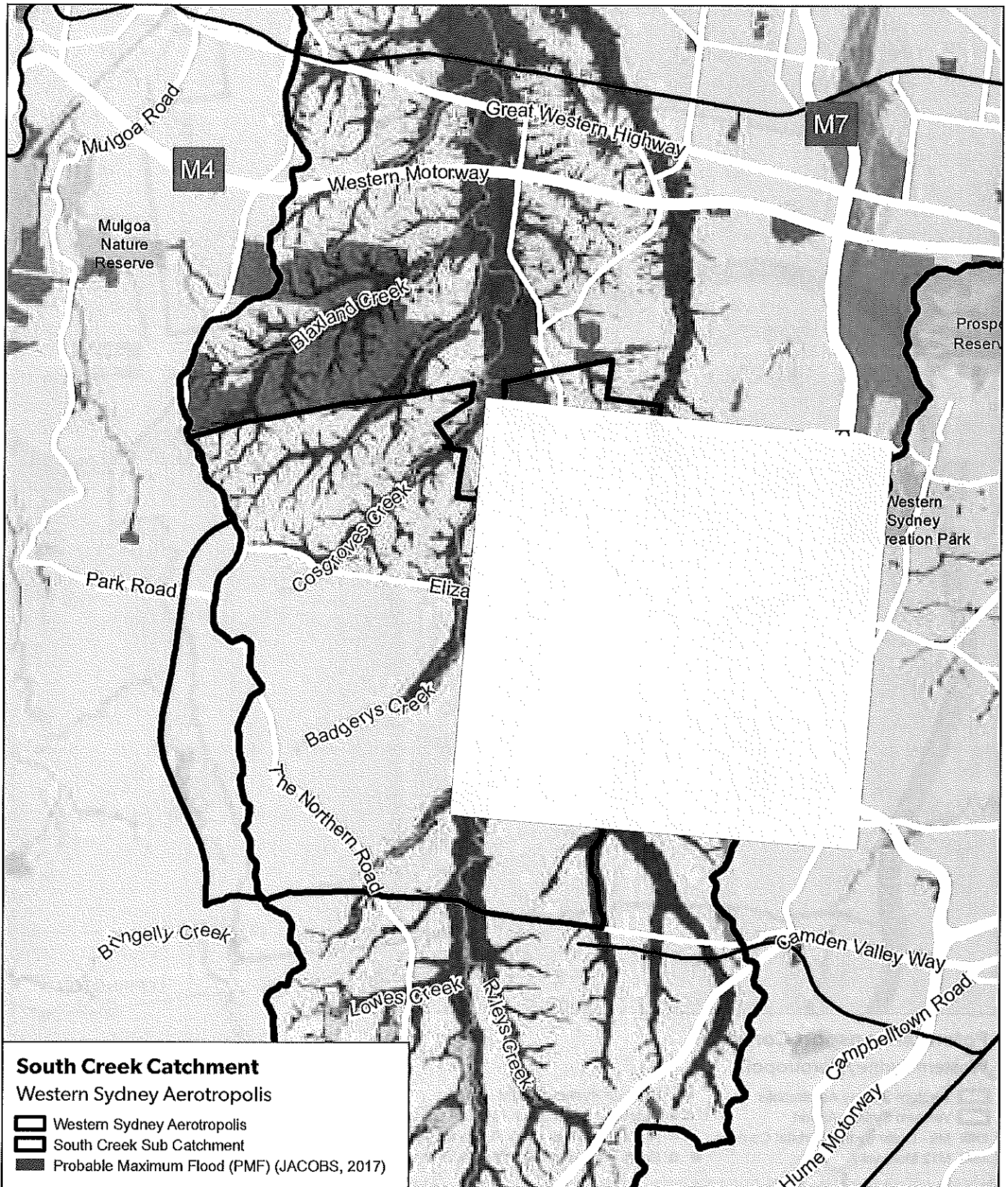
- | | |
|------------------------------------|------------------------------------------|
| Western Sydney Aerotropolis | Western Sydney Freight Line |
| Western Sydney Airport | Proposed North South Rail Link - Stage 1 |
| M9 - Outer Sydney Orbital Corridor | North South Rail Link - Future Stages |
| M12 Motorway | South West Rail Link Potential Extension |

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FIGURE 11G

Potential Transport Corridors - Western Sydney Aerotropolis, Land Use and Infrastructure Implementation Plan

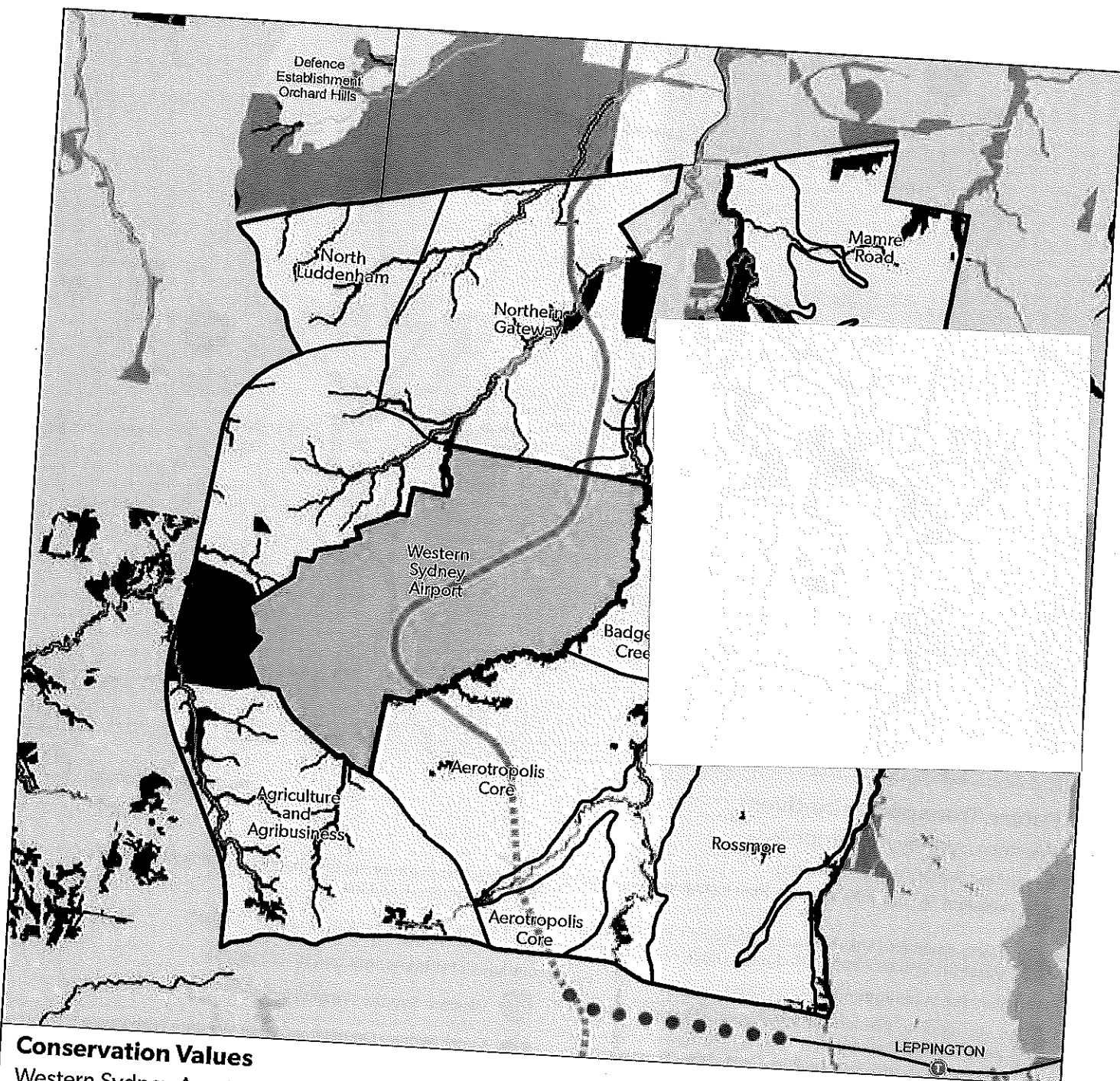
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FIGURE 11H
South Creek Catchment - Western Sydney Aerotropolis, Land Use and Infrastructure Implementation Plan

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Conservation Values

Western Sydney Aerotropolis

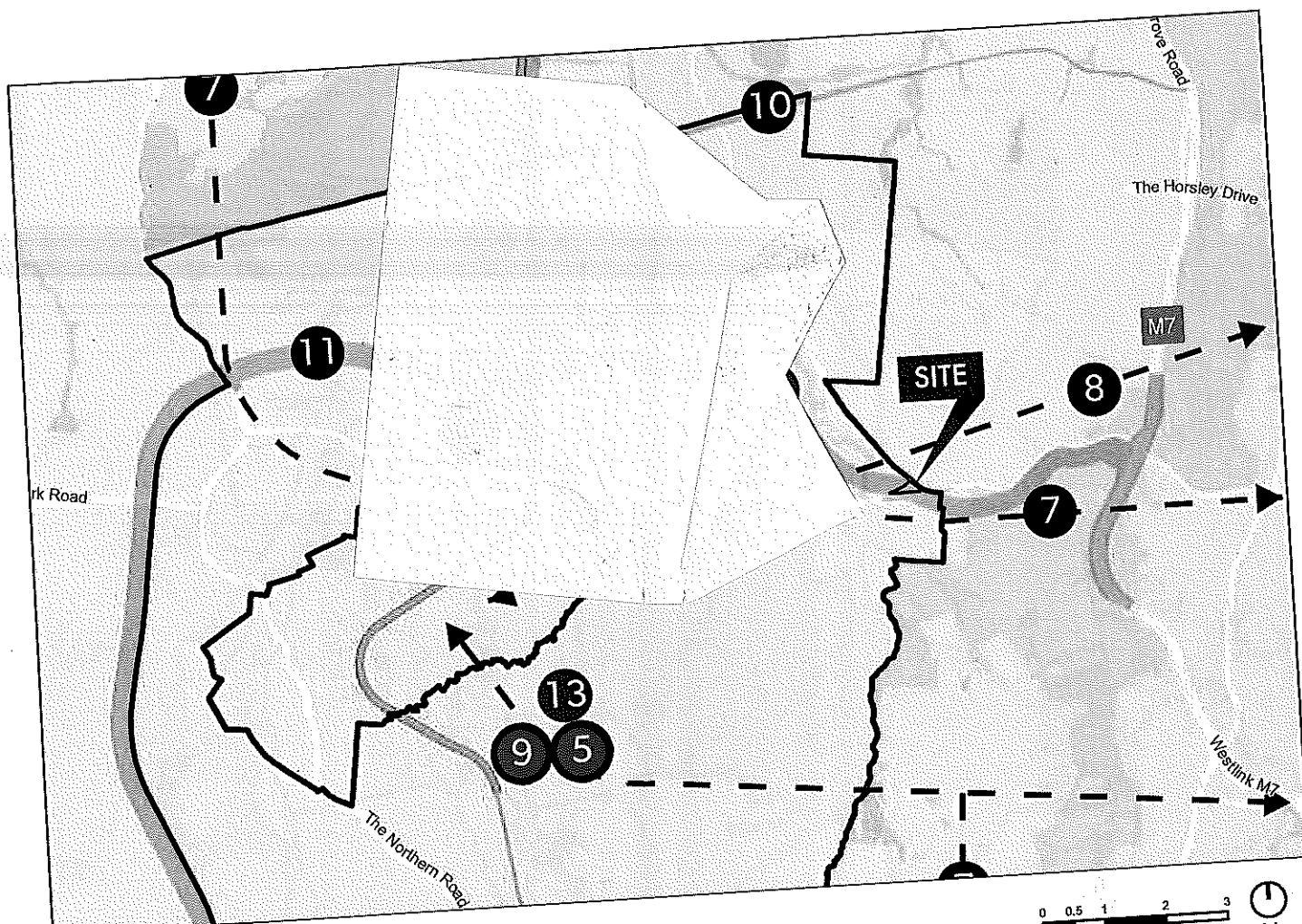
- Western Sydney Aerotropolis
- Precinct Boundary
- Western Sydney Airport
- Potential and Existing Conservation Land
- National Parks and Nature Reserves
- Environmental Conservation
- Defence Land
- Proposed North South Rail Link - Stage 1
- North South Rail Link - Future Stages
- South West Rail Link Potential Extension
- Railway
- Waterways

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FIGURE 111
Conservation Values - Western Sydney Aerotropolis, Land Use and Infrastructure Implementation Plan

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Future Transport Initiatives

Western Sydney Aerotropolis

Committed Initiatives (0 - 10 years)

- 1 Western Sydney Infrastructure Plan including the new M12
- 2 North-south Rail link in Western Parkland City: St Marys - Western Sydney Airport - Badgerys Creek Aerotropolis

Initiatives for Investigation (0 - 10 years)

- 3 Leppington to Western Sydney Airport - Badgerys Creek Aerotropolis Rail Link
- 4 Proposed North-south Rail Link in Western Parkland City: Western Sydney Airport - Badgerys Creek Aerotropolis - Campbelltown-Macarthur
- 5 Western Sydney Airport - Badgerys Creek Aerotropolis Connected and Automated Vehicles zone*
- 6 Western Sydney Fuel Pipeline*

- 7 Infrastructure to support Rapid Bus Connections and Improved Bus Connections between Western Sydney Airport - Badgerys Creek Aerotropolis and Penrith, Liverpool, Blacktown and Campbelltown-Macarthur

- 8 Western Sydney Airport - Badgerys Creek Aerotropolis - Parramatta Rail Link
- 9 Western Parkland City Bus Interchange*

Initiatives for Investigation (10 - 20 years)

- 10 Western Sydney Freight Line
- 11 Outer Sydney Orbital from Great Western Highway to Western Sydney Airport - Badgerys Creek Aerotropolis

Initiatives for Investigation (20+ years)

- 12 M5 motorway extension from Liverpool to Outer Sydney Orbital
- 13 Western Sydney Airport - Badgerys Creek Aerotropolis Inner and Outer Ring Roads
- 14 Outer Sydney Orbital from Western Sydney Airport - Badgerys Creek Aerotropolis to Hume Motorway

* Indicative Location

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FIGURE 11J

Future Transport Initiatives - Western Sydney Aerotropolis, Land Use and Infrastructure Implementation Plan

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