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From: system@accelo.com on behalf of APP Corporation Pty Ltd Company
Sent: Friday, 2 November 2018 1:32 PM
To: [REDACTED]
Subject: Submission Details for company APP Corporation Pty Ltd (org_comments)
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Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: APP Corporation Pty Ltd Company
Organisation: APP Corporation Pty Ltd (Urban Planner)
Govt. Agency: No
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Content:
APP Corporation Pty Ltd submission to the Western Sydney Airport Stage 1 Land Use and Infrastructure Implementation Plan

IP Address: - 108.171.134.163

Submission: Online Submission from company APP Corporation Pty Ltd (org_comments)
https://majorprojects.accelo.com/?action=view_activity&id=292030

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

Mr Brett Whitworth
Director, Aerotropolis Activation
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Whitworth,

**RE: LANDOWNER SUBMISSION IN RELATION TO THE WESTERN SYDNEY AEROTROPOLIS STAGE 1
LAND USE AND INFRASTRUCTURE IMPLEMENTATION PLAN**

This submission has been prepared by APP Corporation Pty Ltd (APP) on behalf of the landowner's of [redacted] (legally described as [redacted]) (hereafter referred to as 'the site'). The site is located on the northern side of Elizabeth Drive and is adjacent to the proposed Western Sydney Airport (See Figure 1). The western boundary of the site is formed by Badgerys's Creek. The site is within the Local Government Area (LGA) of Penrith. The site is occupied by a single dwelling and sheds, as well as a track in the north-western corner. The remainder of the site is occupied by paddocks with minimal vegetation.

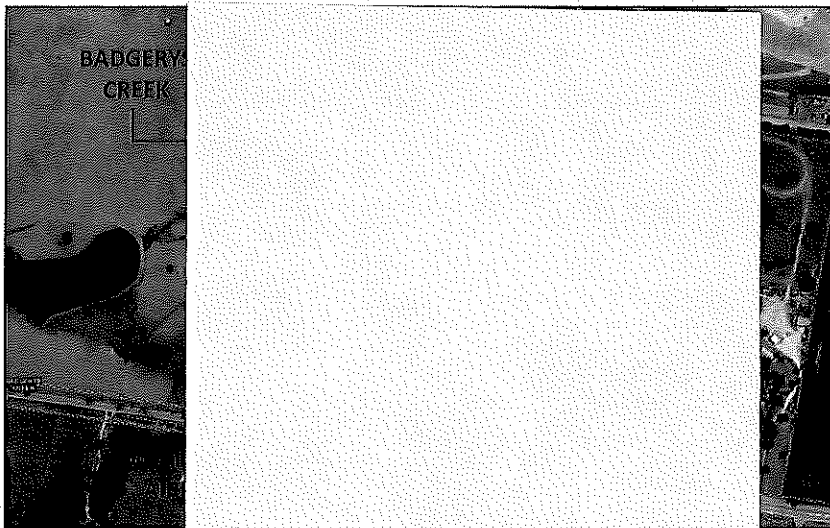


Figure 1

This submission has been prepared in response to the 'Western Sydney Aerotropolis – Land Use and Infrastructure Implementation Plan (LUIIP) - Stage 1' (The plan). The plan establishes the high-level vision for how the Western Sydney Aerotropolis might take shape, identifying potential land uses and the sequence of development surrounding the new Western Sydney Airport. It identifies three initial precincts for priority planning including the Aerotropolis Core, Northern Gateway and South Creek, with the remaining precincts of North Luddenham, Rossmore, Mamre Road, Kemps Creek, Badgerys Creek

and Agriculture/Agribusiness to follow. APP on behalf of the landowner commends the NSW Government in their efforts to release the plan, and commence the vision for the Western Sydney Aerotropolis.

The site is identified within the plan, and spans across two of the proposed precincts including the South Creek initial precinct identified as “non-urban land”, and Badgerys’s Creek identified as “employment land” (See Figure 2). Whilst the landowner supports the overall vision for the broader Western Sydney Aerotropolis and objectives for the South Creek precinct, there are a number of factors which warrant consideration in finalising the plan. These include:

1. Re-investigating the South Creek Precinct Boundary in relation to the site
2. Recognising the development potential of the site as part of the Badgerys’s Creek Precinct (and broader Aerotropolis)
3. Greater clarification regarding land uses within South Creek
4. On-going Consultat

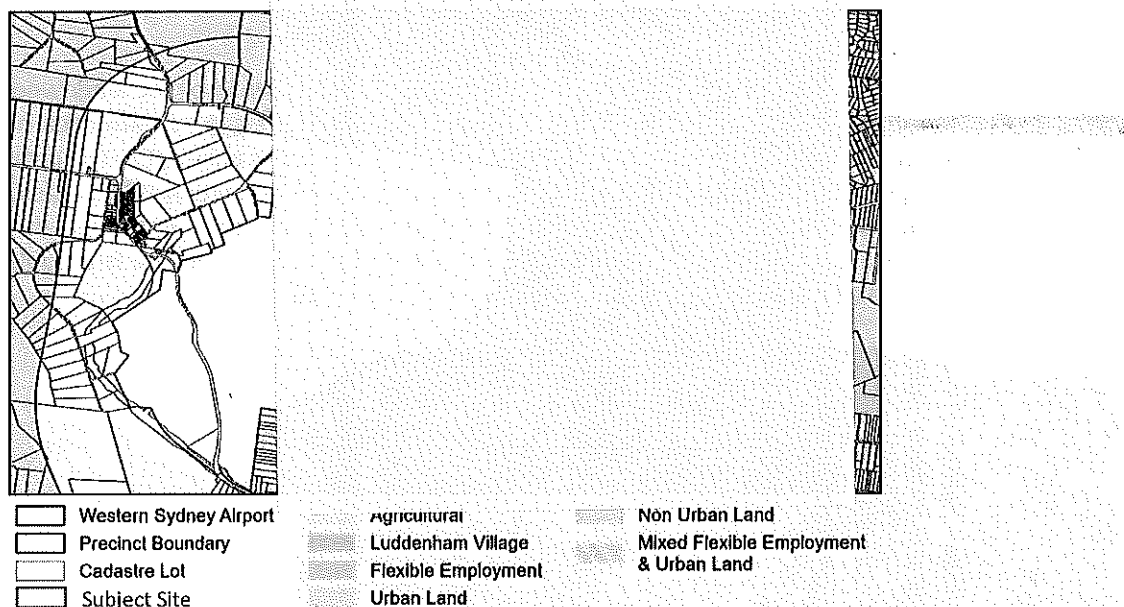


Figure 2 The site in relation to the LUIIP (DPE 2018)

1. RE-INVESTIGATING THE SOUTH CREEK PRECINCT BOUNDARY IN RELATION TO THE SITE

The *Western Sydney Aerotropolis – South Creek Precinct FAQs* (DPE 2018, p. 3) states that the boundaries of the South Creek Precinct have been developed to reflect environmental considerations, such as significant vegetation as well as the PMF level, within which it is appropriate for potential new water and waste water infrastructure required to reduce any implications of the creek as a result of flooding.

Whilst the need for water infrastructure proposed under the South Creek Precinct is understood, the extent of the precinct’s boundary on the site is considered onerous. The plan does not justify why water infrastructure can only be accommodated on “non-urban” land. Given the large size of the site, there is opportunity to provide a well-thought, appropriate flooding design response through measures that can be integrated as part of future development on the site, which fits within the Badgerys’s Creek Precinct whilst responding to the South Creek Precinct. Minimal flood impacts on the existing flood regime,

surrounding environment and minimal risk to life would need to be demonstrated as part of this process. This in combination with future design controls associated with the South Creek precinct for example; appropriate setbacks and interface with South Creek (and riparian lands) including landscaping/planting to aid cooling etc. can still achieve good flood planning outcomes and meet the overall objectives of the plan.

The *Western Sydney Aerotropolis – South Creek Precinct FAQs* indicates that where land is partially within the South Creek Precinct, that future detailed planning to be undertaken in 2019 will help to refine the precinct boundary including consideration of property boundaries. This approach is supported, and it is recommended that the matters raised above be considered as part of this process. However, where the plan maintains that certain lands remain partially within two precincts, the plan should adopt a ‘flexible planning approach’ (along boundaries) which can include the integration of water infrastructure principles to ensure best practice planning outcomes can be achieved.

2. RECOGNISING THE DEVELOPMENT POTENTIAL OF THE SITE AS PART OF THE BADGERYS’S CREEK PRECINCT AND BROADER AEROTROPOLIS

The site represents a significant development opportunity given that it is consolidated, has a large site area (approximately 15.2 hectares), is adjacent to the new airport, and has a frontage to Elizabeth Drive, which is identified as key road infrastructure within the plan to provide key east-west link in the north of the Aerotropolis precinct. The site is also located in close proximity to several planned major transport corridors including the North South Rail Link, the Outer Sydney Orbital and the M12 Motorway. Moreover, the proposed Mirvac Elizabeth Drive Enterprise Precinct (EDEP) is located approximately 570 metres east of the site. The EDEP comprises a 240ha area of land and proposes the delivery of employment land, retail centres and public open spaces that adjoin Elizabeth Drive for workers and residents nearby. The site presents a significant development opportunity as part of the Badgerys Creek employment precinct (and broader Aerotropolis) given its size, location and key frontage, in addition to its proximity to lands being controlled by significant developers.

The plan identifies that landowners will be able to apply to accelerate the rezoning of a precinct earlier, however, as shown in Figure 2, majority of the site is located within both the South Creek Precinct (one of three ‘initial precincts’) and the remainder within the Badgerys Creek Precinct (to be rezoned at an unknown, later stage). Further to the matters discussed in relation to the South Creek boundary in point 1, the landowner raises concern that the division of their site between these two precincts will not allow the site to be holistically considered on its own merits and properly, as part of the accelerated rezoning process.

3. GREATER CLARIFICATION REGARDING LAND USES WITHIN SOUTH CREEK

Under Appendix 8.1 of the LUIIP, specific “non-urban” land uses are envisioned within the South Creek Precinct including: *Open space, Recreational facilities, Pedestrian and cycle connectivity, Community facilities, and Restaurants or cafes*. Some residential and employment uses may also be possible, provided they are located in areas outside of the Australian Noise Exposure Concept (ANEC) 20, are connected to mixed use residential, and are above the 1 in 100 year flood justified by the Sector Strategy. Uses fronting onto Badgerys’s Creek and riparian areas are generally supported as they will benefit from greater amenity and access to natural open space.

Whilst residential and employment uses have been suggested within South Creek Precinct, greater clarity is required as part of the Stage 2 – LUIIP in relation to the extent and scale of such development,

in recognising their role early within this precinct.

It is noted that the general standard for residential development is above the 1 in 100 flood line and is a matter that can be controlled through detailed design. On the other hand, employment/non-residential uses (such as industrial and commercial), are generally not precluded below the 1 in 100 flood level provided that the development can demonstrate all practical measures will be taken to prevent or minimise the impact of flooding and water quality.

The site is highly capable of providing employment uses and we request that as part of the Stage 2 LUIMP, the *types* of employment uses envisaged within the South Creek precinct be provided.

4. ON-GOING CONSULTATION WITH AFFECTED STAKEHOLDERS

The Western Sydney LUIMP indicates that over the coming months the Department will be working with stakeholders including landowners and the community in preparing the final LUIMP. The landowner is supportive of this approach, however requests that on-going consultation with affected landowners occurs to ensure absolute transparency throughout this process. The landowner is keen to work with NSW Government in relation to the site.

CONCLUSION

In conclusion, the landowner supports the overall vision for the Western Sydney Aerotropolis and South Creek precinct, however is of the view that further consideration is required in relation to the site including its significant development potential as part of the broader Aerotropolis, the extent of the South Creek Precinct boundary on the site, and greater clarification on the land uses envisaged within this precinct in finalising the plan.

We thank you for the opportunity to provide a submission in relation to the Stage 1 - LUIMP, and kindly request that the Department of Planning take into consideration the matters raised within this submission.

If you have any queries, or request's for additional information, please contact [REDACTED]
[REDACTED] or alternatively, [REDACTED]

Yours sincerely
APP CORPORATION PTY LIMITED

[REDACTED]

Diana Khoury
Urban Planner