

[REDACTED]

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**From:** system@accelo.com on behalf of Daniela Vujic <[REDACTED]>  
**Sent:** Friday, 2 November 2018 2:19 PM  
**To:** [REDACTED]  
**Subject:** Submission Details for company MacroPlan (org\_comments)  
**Attachments:** 292068\_MP\_submission general\_WSA LUIP Stage 1\_2 November 2018.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

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Content:  
Please find attached MacroPlan's submission

IP Address: - 122.102.98.129  
Submission: Online Submission from company MacroPlan (org\_comments)  
[https://majorprojects.accelo.com/?action=view\\_activity&id=292068](https://majorprojects.accelo.com/?action=view_activity&id=292068)

Submission for Job: #9552  
[https://majorprojects.accelo.com/?action=view\\_job&id=9552](https://majorprojects.accelo.com/?action=view_job&id=9552)

Site: #0  
[https://majorprojects.accelo.com/?action=view\\_site&id=0](https://majorprojects.accelo.com/?action=view_site&id=0)

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2 November 2018

[REDACTED]  
Executive Director, Western Sydney and Aerotropolis Activation  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Mr [REDACTED]

**Re: Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan – Stage 1 Initial Precincts**

MacroPlan is supportive of a planning framework being prepared for the Western Sydney Aerotropolis (Aerotropolis) in order to provide economic, development and community benefits for businesses, residents and the Western Sydney Airport. We also support the Department reinforcing the regional vision of the *Western City District Plan* and providing further certainty for the private sector to invest in western Sydney and deliver on the vision for the region through the preparation of land use and infrastructure implementation plans.

The Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan (LUIIP) identifies nine precincts for development in stages subject to precinct plans being prepared. The three initial priority precincts are logical however, they are totally dependent on the completion of major infrastructure elements. Other precincts that have not been included in this LUIIP are adjacent to existing infrastructure or infrastructure already under construction. These precincts have the capacity to meet the rapidly increasing demand for employment and freight and logistic lands. For example the North Luddenham Precinct could provide early access to the Northern Gateway from the upgraded Northern Road. The Mamre Road Precinct adjoins rapidly expanding industrial and employment land areas and numerous services and major infrastructure will be extended through this area.

We would appreciate the Department of Planning and Environment considering the below comments on the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan (LUIIP) as part of facilitating the future development of this area.

- The requirement to follow the existing planning gateway process and the Unsolicited Proposal process for “out of sequence proposals” has the potential to add additional costs and time delays to the planning process for proponents.
- Development which fulfils the assessment criteria and demonstrates consistency with the strategic planning for the Aerotropolis and the Western Parkland City should not be delayed or linked to the finalisation of the three initial precinct plans and the new State Environmental Planning Policy (SEPP).
- The SEPP should identify and protect key freight corridors and industrial and urban services land for freight uses and ensure new residential development being built is designed to mitigate noise impacts from freight activities.

- The SEPP should not identify the sequencing of land release precincts. The development of the intended land uses within the Aerotropolis will be driven by private investment and private partnerships and it will be important to facilitate development where there is demand and consistency with existing strategic planning documents such as the Western City District Plan.
- The utilisation of the 'Airport Freight and Logistics Precinct' for airfreight will be directly linked to the number of international passenger services and the destination of these flights. Hence the use of this Precinct and adjoining lands in the short to medium term should be further explored.
- The implementation of planning mechanisms to facilitate the efficient movement of freight and the productive use of freight and logistics lands needs to be considered in order to cater for the forecast freight task for Western Sydney.
- The LUIP does not address the land use interface of the Aerotropolis with adjoining lands to the west of the LUIP. Consideration should be given to the extension of proposed uses within the Aerotropolis particularly where less fragmented land holdings adjacent to major infrastructure would provide the opportunity to deliver the desired land use outcomes for the Western Parkland City.

Detailed comments are provided below.

#### **Interim and out of sequence arrangements:**

The Western Sydney Aerotropolis has been divided into nine precincts with the LUIP prioritising the planning and delivery of three initial precincts. The process proposed to facilitate the early development of land in the other precincts (i.e. an "out of sequence proposal") will require proponents to demonstrate consistency with strategic planning strategies for the Western Parkland City as well as specific requirements identified in the LUIP. This is to be undertaken through a planning gateway process and is also to follow the governance process outlined in the NSW Government's *Unsolicited Proposal Guide 2017*.

MacroPlan is supportive of the Department's existing planning gateway and planning proposal process for rezoning applications however, we are concerned that the Unsolicited Proposal process could prolong a rezoning process if the planning gateway and Unsolicited Proposal process both need to be followed and hence the potential for additional costs and time delays to the planning process for proponents. It is also not clear if proponents will be required to enter into contractual agreements with Government and demonstrate the uniqueness of a proposal as identified in the *Unsolicited Proposal Guide*. The proposed process, once drafted, should be documented for public review and comment including indicative timeframes to progress "out of sequence proposals".

We are also concerned that an "out of sequence proposal" may be delayed until such time that the three initial precinct plans are finalised and the State Environmental Planning Policy (SEPP) is released. Development which fulfils the assessment criteria and demonstrates consistency with the strategic planning for the Aerotropolis and the Western Parkland City should be facilitated in the shorter term.

#### **New State Environmental Planning Policy (SEPP):**

The LUIP notes that the SEPP for the Aerotropolis will provide important protections for the community of the new Aerotropolis from aircraft noise. It is also important to acknowledge that the Aerotropolis will facilitate freight and logistics uses and hence should be considered in the drafting of the SEPP.

The *NSW Freight and Ports Plan 2018-2023* (FPP) identifies that there is an opportunity to reserve appropriate land for the growing freight task, particularly around Western Sydney Airport and the Western Sydney Employment Area through good planning. The FPP identifies the need for planning authorities to identify and protect key freight corridors and industrial and urban services land for freight uses and for land use planning policies to avoid new residential development being built too close to freight activity.

Section 5.1 of the LUIP states that the SEPP will “identify appropriate sequencing of land release precincts and establish strict criteria to guide alternative release scenarios”. MacroPlan is of the opinion that this should not be documented in an environmental planning instrument but instead identified in a planning guideline or framework. The development of the intended land uses within the Aerotropolis will be driven by private investment and private partnerships and it will be important to facilitate development where there is demand, early access to supporting infrastructure and consistency with existing strategic planning documents such as the Western City District Plan.

#### **Airport Freight and Logistics Precinct:**

The majority of airfreight is currently carried in the hold of passenger planes with the remainder being transported by dedicated freight aircraft. Therefore the utilisation of the Airport Freight and Logistics Precinct for airfreight will be directly linked to the number of international passenger services and the destination of these flights. Hence the use of this Precinct and adjoining lands in the short to medium term should be considered and a broadening of ‘general’ freight and logistics uses allowed.

#### **Freight requirements and future growth:**

The growth in the freight task for the Western Parkland City is forecast to be greater than population growth for the District over the next 20 years (Figure 1). Significant growth in the volume of imported containers is also predicted for the Western Parkland City (Figure 2). The delivery of new freight infrastructure will further support the efficient movement of freight to and from Western Sydney.

The zoning of land for a future intermodal terminal in Western Sydney is supported and will facilitate the movement of freight to and from Port Botany and a future container facility at Port Kembla with the construction of the Maldon-Dombarton Rail Line. The proximity and total volume of land holdings that facilitate freight and logistics uses will further support the commercial viability of an intermodal terminal in Western Sydney. The implementation of planning mechanisms to facilitate the efficient movement of freight and the productive use of freight and logistics lands will be critical to the future economic growth and development of NSW.

The proximity of the Mamre Road precinct to existing freight-related infrastructure and employment lands (i.e. the Western Sydney Employment Area, the M4 and M7 Motorway) and proposed future freight-related infrastructure (e.g. the Western Sydney Freight Line, M12 Motorway, Outer Sydney Orbital motorway and freight line and an intermodal terminal for Western Sydney) as well as the lands exposure to future aircraft noise (ANEC/ANEF 20-25), the rezoning of this land should not be delayed for employment, warehousing and freight and logistics uses. Section 8.3 of the LUIP confirms that this precinct is well suited for such uses. Landholdings are currently available to be developed for this purpose, providing investment certainty and jobs for Western Sydney.

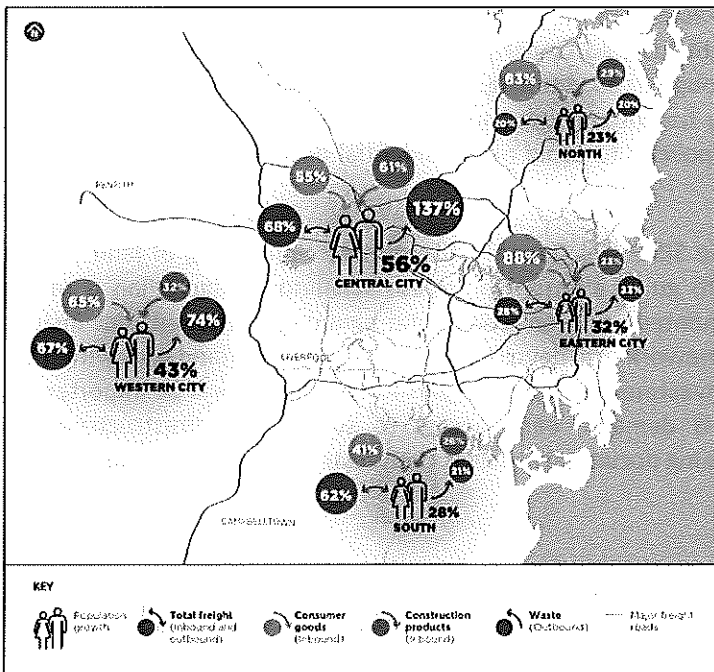
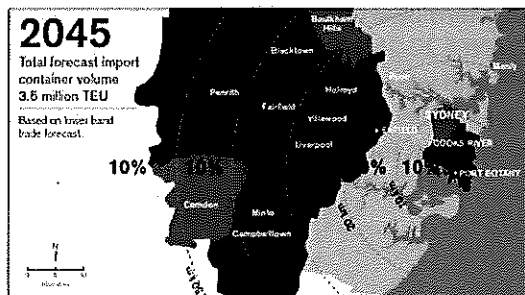
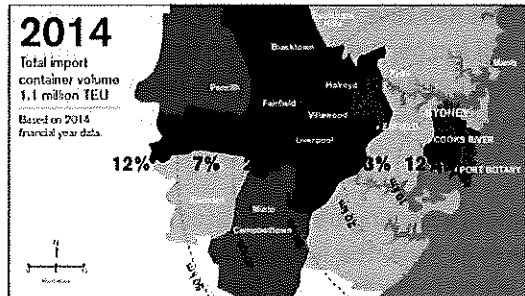
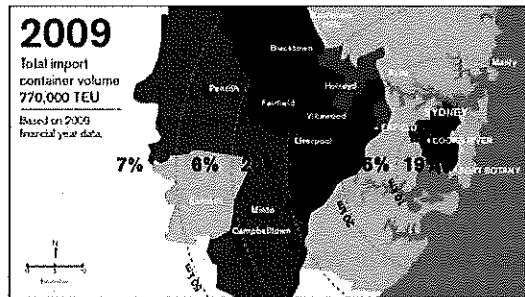


Figure 1: Greater Sydney population and changes in freight demand to 2036 (source: TfNSW, NSW Freight and Ports Plan 2018-2023)

Distribution of import containers

Over 80 per cent of import containers through Port Botany are delivered within a 40 kilometre radius of the Port and this will remain over the next 30 years.



- Greater than 170,000 TEU
- 80,000 to 170,000 TEU
- 45,000 to 80,000 TEU
- 30,000 to 45,000 TEU
- 20,000 to 30,000 TEU
- 0 to 20,000 TEU
- % percentage of imported containers within 10 kilometre radius bands.

Note: Distribution mapped by local government area.

Figure 2: Forecast distribution of import containers (source: NSW Ports, Navigating the Future – NSW Ports' 30 Year Master Plan)

**Opportunities outside the Aerotropolis:**

MacroPlan is supportive of the Aerotropolis providing new housing and employment opportunities within the Aerotropolis. We are of the view that the planning framework should provide flexibility to extend proposed uses within the nine precincts into adjoining lands (i.e. land to the west of the Aerotropolis) in order to maximise land use and transport integration and the development outcomes for this area. There may be more opportunity to deliver the desired outcomes for the Western Parkland City on lands outside the Aerotropolis where landholdings and land ownership are less fragmented.

Yours sincerely,



**Michael Tilt**  
**Chief Executive Officer**

