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Name: Western Sydney Regional Organisation of Councils Ltd Company  
Organisation: Western Sydney Regional Organisation of Councils Ltd (Regional Waste Coordinator)  
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Content:  
Please see File attachment 1.

IP Address: [REDACTED]  
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*Advocating for the people of Western Sydney*

**Submission:**

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

**2 November 2018**

**Western Sydney Regional Organisation of Councils Ltd**

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## About WSROC

The Western Sydney Regional Organisation of Councils (WSROC), representing councils in Western Sydney, has reviewed the *Western Sydney Aerotropolis – Land Use and Infrastructure Plan – Stage 1: Initial Precincts* (Plan) relevant to the waste and resource recovery services provided by councils to its residents.

In 2014, the NSW Environment Protection Authority (EPA) funded regional waste groups, to develop waste avoidance and resource recovery strategies and projects to outline future directions for resource recovery practices across the region.

The western Sydney waste group includes Western Sydney and Macarthur waste strategies, concerning the councils: Blacktown City Council, Blue Mountains City Council, Cumberland Council, Fairfield City Council, Hawkesbury City Council, Liverpool City Council, Parramatta City Council, Penrith City Council, The Hills Shire Council, Camden Council, Campbelltown City Council and Wollondilly Shire Council.

WSROC has reviewed the Plan in accordance with the western Sydney regional waste strategies and submits the following comments and recommendations for consideration.

## **Executive Summary**

Western Sydney Region Organisation of Councils (WSROC) welcomes the opportunity to comment on the draft *Western Sydney Aerotropolis Land Use and Infrastructure Plan, Stage 1: Initial Precincts (Plan)*.

WSROC supports the preparation and establishment of a plan that will set the strategic direction concerning land use and infrastructure provisions for the Western Sydney Aerotropolis.

As identified within the Plan, it is truly a "once in lifetime" opportunity to plan and integrate future land use planning and provide supporting infrastructure, and safeguard essential urban services.

We welcome the planning and delivery of the infrastructure and supporting urban services for the western Sydney region. However, our review of the Plan has raised concerns that it has not given the issues surrounding waste and resource recovery (recycling) adequate consideration. It is our view that waste planning (includes both waste and resource recovery) is an important consideration for not just western Sydney but for the greater Sydney region, as the Aerotropolis precinct is home to the majority of Sydney's waste management infrastructure.

The lack of recognition of waste and resource recovery as an essential urban service is currently a shortcoming and missed opportunity of the Plan.

WSROC advocates that waste and resource recovery needs to be recognised as an essential urban service within the Plan. It is essential for the success of Western Sydney and the future Aerotropolis precincts that waste infrastructure and waste assets are recognised as an essential service akin to energy and water. Waste and resource recovery therefore must be incorporated into land use and infrastructure planning for the Western Sydney Aerotropolis.

WSROC is supportive of the *Western Sydney Aerotropolis – Land Use and Infrastructure Plan* aligning with the actions and priorities of the Western City District Plan. WSROC supports the inclusion of waste management driven priorities within sustainability actions and priorities of the *Western City District Plan*.

However, it is concerning that in planning for land use and infrastructure for the Western Sydney Aerotropolis there is very little mention of waste and no recognition of waste and resource recovery as an essential urban service, or the recognition of this precinct as the home for Sydney's waste management infrastructure.

WSROC submits that the following issues need to be adequately addressed:

- Planning and coordinating new aerotropolis infrastructure delivery include consideration of investment in waste and resource recovery as a priority. Opportunity for securing land (and appropriate land use zonings) and investment of new waste management infrastructure must be incorporated into the Plan;
- In the consideration of potential land uses across the proposed precincts, future land use zonings must ensure the protection of existing and essential waste infrastructure and assets across western Sydney;
- Consideration and investigation of planning for waste infrastructure and waste assets (or at a minimum proposing suitable land use zoning) within the Western Sydney Aerotropolis that can meet current and forecasted waste needs, as well as waste generated by developments across the future Aerotropolis precincts; and
- Ensure the use of innovative and sustainable design-led planning principles that includes consideration of waste generated and potential resource recovery opportunities. This is essential in ensuring the efficient and safe servicing of waste across urban communities and residential developments. This is paramount as planning for the Aerotropolis precincts move towards creating new urban environments and higher density communities.

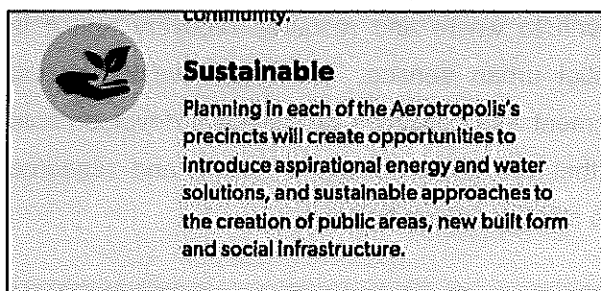
# WSROC Response to Draft Plan

## 1. Sustainability Principle

Western Sydney waste group supports the Plan's principles for success that will underpin planning, development, infrastructure coordination, cross-government collaboration and engagement with landowners, community and industry stakeholders.

The inclusion of sustainability as a standalone principle is welcomed and supports the sustainability actions and directions contained within the *Western City District Plan* (District Plan). However, as recognised in the District Plan, sustainability must include waste and resource recovery and given the same detail and level of consideration as an essential service akin to energy and water.

Figure 1: Extract from Plan, *Visioning for success - Sustainable principle*, p8.



### 1.1 Recommendations

- That the sustainability principle be expanded to include waste and resource recovery.

## 2. Supporting State and Regional Plans

WSROC supports the approach of the Plan to link with and support existing state and regional plans. Therefore, it is essential that the sequenced land use and infrastructure planning and delivery be consistent with the outcomes and directions of *A Metropolis of Three Cities* and the *Western City District Plan*.

The *Western City District Plan* identifies a series of planning priorities and objectives. Most relevant to waste planning is Planning Priority W19 - *reducing carbon emissions and managing energy, waste and water efficiently*) and objectives 35: *More waste is re-used and recycled to support the development of a circular economy.*

It is concerning that clear strategic and infrastructure planning within the Plan does not expand on or provide in any detail how this specific planning priority and objective of the Western City District Plan has been considered for the Western Sydney Aerotropolis.

### **3. Waste and Resource Recovery is an Essential Urban Service**

Waste and resource recovery is an essential urban service. Therefore, waste and resource recovery must be incorporated into land use and infrastructure planning for the Western Sydney Aerotropolis.

It is vital that planning considerations are given to waste and resource recovery and it is acknowledged within the Plan as an essential urban service. Too often "waste" is just considered in terms of general waste management and collection of individual developments and the full gamut of activities and issues that are captured within "waste and resource recovery" are never realised and addressed at a strategic planning level.

This is evident within the Plan (extract provided in Figure 2), where waste is considered only as a utility to support individual developments rather than an essential urban service. It is disappointing that waste and resource recovery has been disregarded as a key urban issue for the Aerotropolis and not included as part of the infrastructure planning and delivery considerations.

WSROC advocates that waste needs to be elevated and considered in the Final Plan as part of the key infrastructure that will require further investigation and funding decision, and in the delivery framework for the initial precincts.



Figure 2: Extract from Plan, 6.2 Utilities and services, p.50

## **6.2 Utilities and services**

The timely and efficient provision of enabling infrastructure is a key consideration to activate precincts. Limited trunk infrastructure means significant planning and investment is required to unlock development in the Aerotropolis.

As work continues to investigate the accommodation of trunk infrastructure, consideration needs to be given to how this will be funded and the timing and impacts of any infrastructure maintenance on road corridors. As an example, trunk infrastructure is not to be located within the Elizabeth Drive corridor but adjacent to that corridor within service roads or easements.

The second stage of the Land Use Plan (the Final Plan) will include a flexible servicing strategy that will provide long-term direction, ensure certainty of utility supply and allow for alternative servicing solutions as technologies and hybrid servicing methodologies. Precinct planning must build in a reduction in carbon emissions and recognise the use of urban design and smart infrastructure to manage energy, water and waste efficiently.

The Plan discusses the challenges of coordinating infrastructure and land use planning and identifies how all levels of government working collaboratively with the community and industry stakeholders are aiming to deliver infrastructure in line with the planned growth.

WSROC accepts that this is a significant challenge. It is therefore vital that the considerations of infrastructure and essential service delivery include waste infrastructure planning and waste asset protection.

### **3.1 Recommendations**

- Chapter 6, Section 6.1 be extended to include waste and resource recovery infrastructure in the Final Plan for further investigation and funding decision.
- Infrastructure and appropriate land use zoning needed for the essential servicing of waste should be included and considered in the Plan.
- Local government and the waste management industry must be consulted as part of the waste infrastructure considerations.

- Proposed zonings for the precincts should ensure infrastructure and urban zones include appropriate land uses that support the range of “waste and resource recovery” land uses.

#### **4. Land Use and Infrastructure Planning**

We support the provision for well-planned residential and urban communities of high quality and amenity standards, and aligning planned population growth with land use planning and infrastructure requirements.

While the Plan has included consideration and planning for water and energy services, transport and social infrastructure such as education, health and arts (culture), the Plan is devoid of any detailed consideration and planning for waste and resource recovery services and infrastructure.

WSROC recommends that the forecast residential growth and urban development be supported by investment in early planning for waste infrastructure, and safeguarding it from sensitive to land use.

The draft NSW *Waste and Resource Recovery Infrastructure Strategy* identifies that by 2021, it is expected that nearly 8.8 million tonnes of waste will need to be processed for the Sydney metropolitan region, which does not include the expected growth generated by the Western Sydney Aerotropolis.

WSROC commissioned *Western Sydney Waste Infrastructure Needs Assessment*<sup>1</sup> identified a shortfall of waste and recycling facilities across Sydney to meet this growth, which will require expanded capacity at existing facilities as well as construction of new facilities.

In addition, this assessment illustrated that Sydney is likely to face a shortage in mixed waste treatment, recycling and organic processing facilities by 2021. Any closure of existing facilities located within the Aerotropolis zone exacerbates this critical need, also recognised in the

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<sup>1</sup> WSROC, 2015, *Western Sydney Infrastructure Needs Assessment*, accessed 01/11/18  
<<https://wsroc.com.au/projects/project-regional-waste/project-infrastructure-needs-assessment>>.

'Greater Sydney Region Plan: A Metropolis of Three Cities'<sup>2</sup>, Objective 23 which states, "Industrial and urban services land is planned, retained and managed – [which] supports retention of local recycling and waste management facilities."

#### **4.1 Recommendations:**

WSROC recommends that the following be considered in infrastructure planning and delivery of the Western Sydney Aerotropolis:

- Sydney's limited landfill availability;
- The limited capacity of existing waste facilities to accommodate projected waste growth resulting from the expansion of residential and urban areas;
- The need for additional waste and recycling infrastructure within the planned precincts for the Aerotropolis due to the planned growth and development; and
- The need for additional construction and demolition waste recycling infrastructure as a waste stream to cater for additional construction and development.

The Aerotropolis precincts will need to accommodate all forms of land uses to support the planned growth and population increases. Traditionally this has considered infrastructure such as roads and schools but in creating truly sustainable urban communities, must be expanded to include waste and resource recovery.

In addition to the above, there is opportunity at this greenfield planning stage to capitalise on the potential for investment and commitment in providing facilities that divert waste from landfill and support these new technologies.

The *Western City District Plan* identifies a series of planning priorities and objectives. Most relevant to waste planning is Planning Priority W19 - *reducing carbon emissions and managing energy, waste and water efficiently*) and objectives 35: *More waste is re-used and recycled to support the development of a circular economy.*

Unfortunately, at this stage, clear planning direction within the draft Plan does not expand on or provide in detail how this specific planning priority and objective can be addressed or achieved.

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<sup>2</sup> Greater Sydney Commission, 2018, *The Greater Sydney Region Plan, A Metropolis of Three Cities*, accessed 01/11/18, <<https://www.greater.sydney/metropolis-of-three-cities>>.

This principle in the structure plan for precinct planning provides the opportunity to capitalise on advanced waste technologies.

The Plan could incorporate progressive waste technologies and precinct-based solutions in line with the District Plans as part of this principle. This would also provide an improved linkage for waste outcomes to the planning priorities and waste outcomes of the District Plan.

The *Western Sydney Waste Infrastructure Needs Assessment* identifies that the broader Sydney metropolitan area needs more waste and resource recovery facilities to service the growing population. Currently, there is a window of real opportunity for securing land, investment and appropriate land use zoning controls for progressive waste technologies and resource recovery solutions.

## **5. Protecting Existing Infrastructure**

We agree that a coordinated approach to infrastructure investment and sustainability initiatives is required. We also suggest that waste infrastructure and planning be included and considered regarding infrastructure investment and delivery, and land use planning decisions.

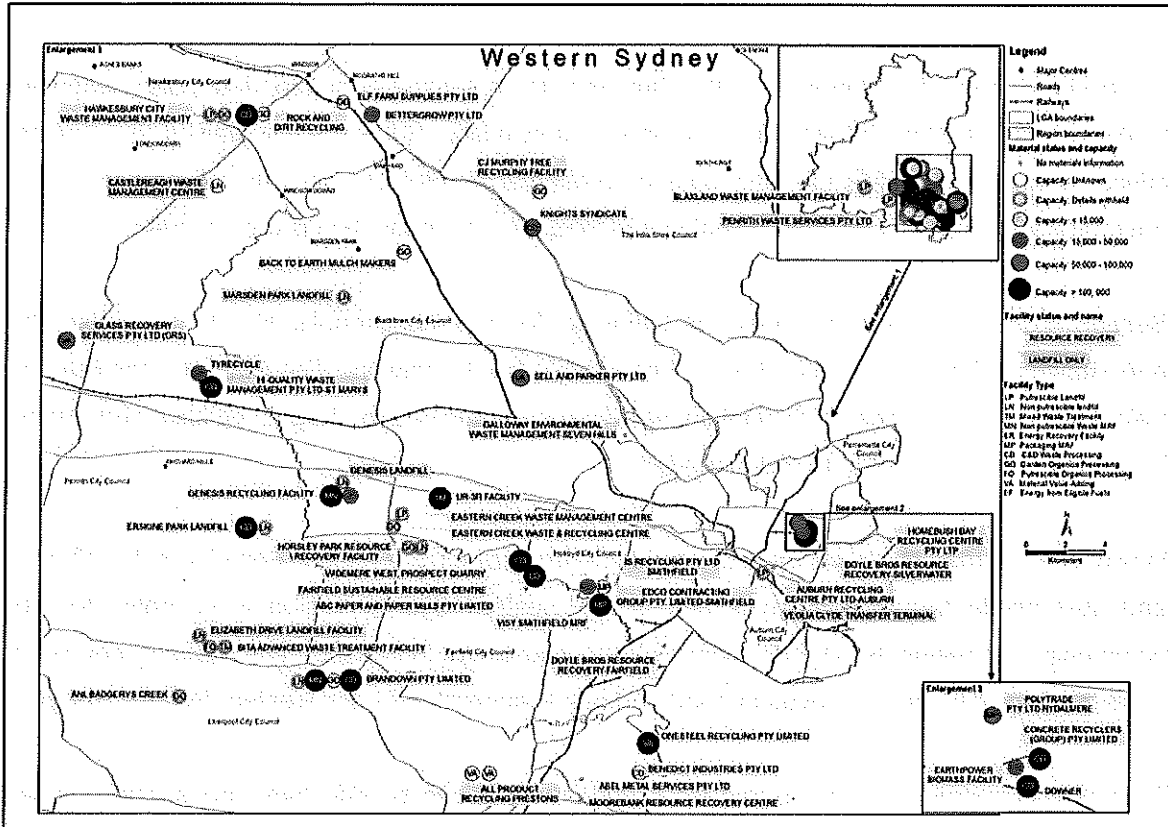
This could include initiatives for securing suitable land for waste management facilities and exploration of new waste technologies. WSROC is willing to collaborate and assist in providing advice and guidance on the waste assessment needs for Western Sydney and the Sydney metropolitan region, alongside with key stakeholders such as NSW Department of Planning and the EPA.

It is essential in land use planning that existing waste and resource recovery facilities and waste assets be identified and protected from urban development pressures.

The Plan should be extended to recognise the pressures placed on waste servicing and infrastructure lands and include mechanisms such as land use zones to protect existing waste and resource recovery infrastructure and assets such as landfills, mixed waste processing facilities, and composting facilities.

Figure 3 illustrates existing waste infrastructure and waste assets such as landfills and resource recovery facilities.

Figure 3: Existing waste infrastructure and waste assets (Source: Western Sydney Waste Infrastructure Needs Assessment)



### 5.1 Recommendations:

- The Plan be expanded to include (or at a minimum commit to) a comprehensive waste infrastructure and waste asset needs analysis for the Western Sydney Aerotropolis precincts. This analysis is essential to:
  - Identify waste needs for the precincts and should be used to inform land use zonings that ensure efficient waste management for the region is secured.
  - Ensure any proposed zoning changes protect existing waste management facility to ensure that they can operate without pressures arising from land use conflict and opportunity to be expanded to meet Sydney's population growth.

- Recognise that a number of these existing waste assets service local government areas outside of Western Sydney and that they are critical infrastructure to the wider Sydney metropolitan area.

## **6. Integrating Land Use and Transport**

It is acknowledged that Chapter 4 of the Plan aims to implement an appropriate policy response to protecting important infrastructure corridors. Specifically, Section 4.2 identifies that several critical transport infrastructure and corridor preservation projects are currently planned and under investigation. This forward planning and infrastructure protection is commended.

Section 4.3 further identifies that the planning for the Aerotropolis should maximise the opportunity for it to be a central hub for the State's freight network. The Plan outlines that the freight line, which is under investigation, will open opportunities for freight, logistics and related industries to better connect to global markets.

WSROC welcomes the investment in road infrastructure for the region. Securing safe, efficient and sustainable transport systems across the western Sydney region is essential for our community and residents. The development and investment in transport and efficient movement of freight (including waste moved by road and rail) is supported for the western Sydney Region.

Transport infrastructure is important for ensuring waste can be effectively transported across local government boundaries to waste management facilities. The pressures councils and the wider industry face, regarding the daily movement and transfer of waste (particularly with a 24-hour economy), needs to be understood and reflected in the Plan. These pressures have implications on costs to the community and directly impact sustainability.

It is WSROC's view that there is opportunity to work with local councils, waste industry groups and stakeholders to ensure transport and freight considerations within the Plan recognise the importance of waste transport and logistic issues faced by councils and the waste industry.

## **6.1 Recommendations:**

- Transport and freight considerations within Chapter 4 of the Plan, should be expanded to include freight challenges faced by local Councils and the broader waste industry, particularly when working towards improving the freight network; and
- The Plan should also consider that the movement of waste within the planned precincts not only impacts western Sydney councils but there are other Sydney councils that use and rely on waste management facilities within western Sydney.

## **7. Contemporary, Liveable Cities**

WSROC agrees that the greenfield nature of the Aerotropolis precincts offers an unprecedented opportunity for advanced sustainability initiatives to create sustainable and livable urban communities.

It is pleasing to WSROC the level of commitment to ensuring future residents and urban communities are both livable and sustainable. WSROC commends the development of design guidelines as detailed within Chapter 4 of the Plan and specifically Section 4.3 that will create a sustainable, liveable and green Aerotropolis.

The establishment of innovative and sustainable urban design principles that will be embedded within future codes and design guidelines to support the precincts is welcomed.

However, it is concerning for WSROC that these considerations within Section 4.3 of the Plan have not been expanded to include the consideration of waste and resource recovery. In creating a sustainable and liveable community for western Sydney, the Plan must consider all supporting land uses and required urban services.

Waste is an essential urban service and it is critical that it is considered at this planning stage to ensure the efficient and safe servicing of waste across urban communities and residential developments. Proper planning for waste service provision has an indisputable impact on local amenity and promotes safer interactions between important service vehicles (such as waste collection vehicles and fire trucks) and the streetscape.

It is noted from the Plan that these design guidelines will be developed through planning partnerships to create workable and innovative standards for street layouts, building design,

infrastructure and utilities, open space and water management.

WSROC urges that local councils are key stakeholders in the development of these design guidelines, specifically for waste requirements. It is essential for these design guidelines to incorporate street layouts and street designs (widths) to allow for the efficient and safe transfer of waste. It is also paramount that building design, particularly for medium and high-density environments, be designed and built to allow for the suitable servicing of waste to occur.

The planning and design of street networks that support safe and efficient transfer of waste is a consideration that needs attention at this early planning phase.

Streets need to be of appropriate width to ensure that they can be accessed by waste collection vehicles. Similarly, design of individual medium and high-density developments need to consider waste servicing in the early design phase. This is to ensure that these individual developments can be serviced, and waste collection vehicles can move and transfer waste without impacting on public safety and amenity.

WSROC welcomes the opportunity to work collaboratively with the relevant authority in the development of these design guidelines. It is important that councils are consulted in this regard, as they shoulder the legislative responsibility for the provision of household waste management services, and each council must apply requirements that best meet the sustainability needs of their community.

Failure to give due consideration to these issues can result in streets not appropriately designed and constructed to facilitate waste servicing, which impacts negatively on both public safety and amenity. Too often waste is considered as an “after thought” in the development process resulting in developments that are not designed or constructed that can be integrated with a council's waste service. This issue extends beyond waste servicing into broader amenity and environmental impacts which affect resource recovery, illegal dumping, litter and odour.

## **7.1 Recommendations:**

- Relevant planning authority consult with local councils to ensure waste servicing is considered in the development of design codes and guidelines that would ensure the effective and efficient collection and transfer of waste.



## 8. Conclusion

In summary, WSROC commends the State government for consulting in the preparation of a strategic plan to guide future land uses for the Western Sydney Aerotropolis and the incorporation of infrastructure planning and delivery for Western Sydney.

The development of the Western Sydney airport is a significant opportunity to truly transform western Sydney. However, it is not without its challenges.

Throughout this submission, concerns have been expressed regarding the lack of emphasis on waste and resource recovery infrastructure. WSROC advocates waste infrastructure planning and delivery must be considered on the basis that it is an essential service, provided to every single resident and business in this precinct. Waste infrastructure planning is as essential as water and energy but is often overlooked as it is a service delivered by local government. Consideration of waste and resource recovery must be elevated within the Plan to achieve a truly sustainable and liveable Western City.

Waste and resource recovery must be considered at a strategic planning level to ensure:

- Existing waste infrastructure and waste assets are protected to ensure their long term and sustainable operation. Consideration of existing waste infrastructure and assets that service not only western Sydney but also other Sydney councils, needs to be given a higher level of detail within the Plan. This includes appropriate land use zones that will allow for their long-term operation by appropriately locating urban development zones to minimise future land use conflict; and
- Strategic planning for the future Aerotropolis precincts considers the waste needs of a growing western Sydney with the expected increase in resident population and urban communities within the Aerotropolis. A waste needs assessment needs to be undertaken as a priority of the Plan.

The development and design of future contemporary and liveable communities needs to ensure:

- Design guidelines and codes are established that incorporate waste servicing considerations.
- Street layouts and urban communities need to be designed to accommodate a street network that supports the safe and efficient transfer of waste, minimisation of litter and illegal dumping and protection of amenity.

Individual developments must be designed to incorporate effective waste management systems that can be integrated with Councils waste collection services. Failure to do so will impact on both the public amenity and safety of the future urban environments, and long-term implications for local governments and residents.

If the final Plan includes a list of key infrastructures for further investigation, it is expected that waste and resource recovery facilities will be included on this list.