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**From:** system@acelo.com on behalf of Daniela Vujic [REDACTED]  
**Sent:** Friday, 2 November 2018 4:58 PM  
**To:** [REDACTED]  
**Subject:** Submission Details for company MacroPlan (org\_comments)  
**Attachments:** 292217\_MP\_submission for client no.2\_WSA LUJIP 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

Name: Daniela Vujic  
Organisation: MacroPlan (Senior Strategic Planning Manager)  
Govt. Agency: No  
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[REDACTED]  
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Content:  
Please find attached MacroPlan's submission on behalf of a client.

IP Address: [REDACTED]  
Submission: Online Submission from company MacroPlan (org\_comments)  
[https://majorprojects.acelo.com/?action=view\\_activity&id=292217](https://majorprojects.acelo.com/?action=view_activity&id=292217)

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

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

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2 November 2018

Brett Whitworth  
Executive Director, Western Sydney and Aerotropolis Activation  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Mr Whitworth,

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

MacroPlan has been engaged by a client to make representations on its behalf with respect to Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan (LUIIP).

Our client commends the Department for preparing the LUIIP for the Western Sydney Aerotropolis which will be Greater Sydney's newest economic hub. This strategic planning led process reinforces the regional vision of the *Western City District Plan* and sets out the planning framework to support all levels of government to deliver jobs and social opportunities for the Western Parkland City. The LUIIP provides further certainty for the private sector to invest in western Sydney and deliver on the vision for the region.

Comments on the LUIIP are outlined in the submission below.

**Background:**

There is significant interest in developing land located to the south of the Western Sydney Employment Area for warehousing and freight and logistics uses. The present inadequate supply of industrial land in Sydney has the potential to impact on Sydney and the State's competitiveness in national and global markets. An increase in the supply of industrial land, particularly in Sydney's outer west, is required to meet demand and service Sydney's employment growth. Freight and logistics uses in western Sydney will provide the catalyst for investment and jobs in western Sydney well before the Airport commences operation.

The Mamre Road Precinct has the capacity to meet the rapidly increasing demand for employment land for freight and logistics use. The Precinct adjoins rapidly expanding industrial and employment land areas which will be further enabled by the multi-billion dollar investment by the Australian and NSW Governments in major transport-related infrastructure projects.

**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 and lands that permit freight and logistics uses will further support the efficient movement of freight to and from Western Sydney and NSW.

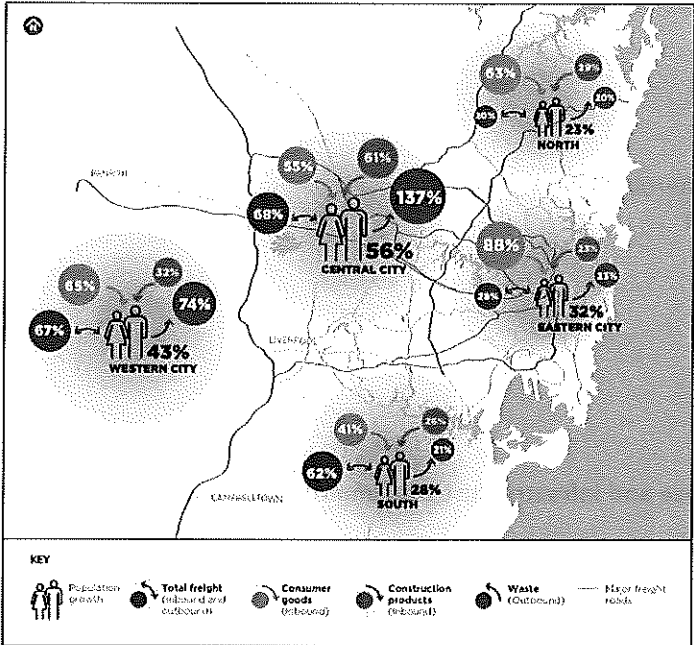


Figure 1: Greater Sydney population and changes in freight demand to 2036 (source: TfNSW, NSW Freight and Ports Plan 2018-2023)

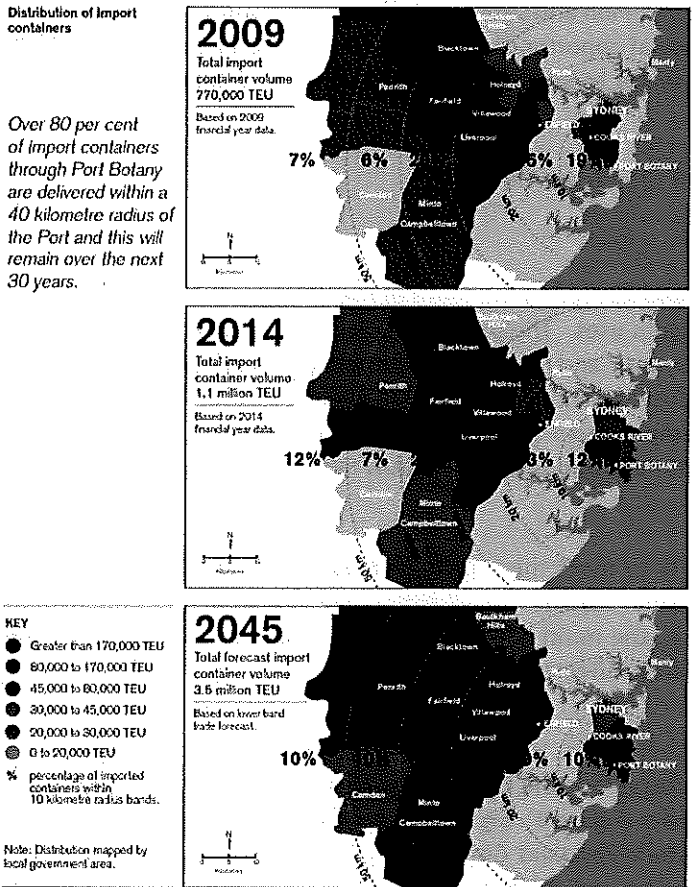
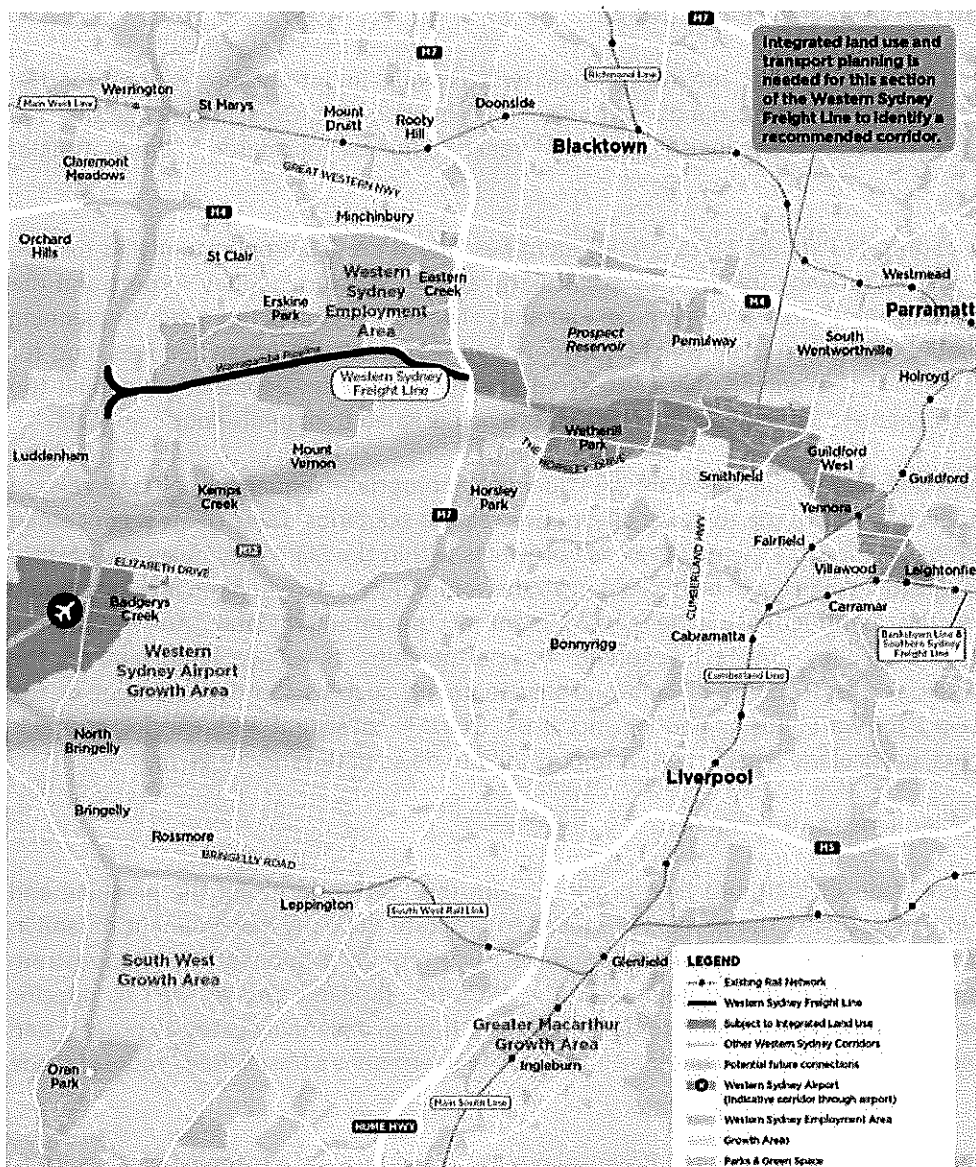


Figure 2: Forecast distribution of import containers (source: NSW Ports, Navigating the Future – NSW Ports' 30 Year Master Plan)

A recommended corridor for the Western Sydney Freight Line has been identified by Transport for NSW (TfNSW) between the M7 Motorway and the planned Outer Sydney Orbital's freight rail corridor (i.e. through the Western Sydney Employment Area) (Figure 3). A future freight rail line would provide freight rail connections to serve employment lands and future industries across the Western Sydney Aerotropolis (Aerotropolis) and support the growth of freight and the logistics industry in Western Sydney. It is anticipated that in the future, the Western Sydney Freight Line corridor may encourage investment in a new Western Sydney intermodal terminal to support future freight needs. In order for a future intermodal terminal in Western Sydney to be viable, a significant cluster and volume of land holdings that permit and facilitate freight and logistics uses will be required with efficient connections to the major road network.



**Figure 3: Recommended Western Sydney Freight Rail Line Corridor (source: TfNSW, *Western Sydney Freight Line Corridor Identification*, March 2018)**

Given the proximity of the Mamre Road precinct to existing freight-related infrastructure (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 and the opportunity to continue to meet demand in the short to medium term. MacroPlan has a number of international logistics clients with requirement for substantial land areas that are not currently available. Meeting these requirements is critical to the efficient operation of Sydney's freight and logistics sector. We therefore request that the rezoning of this precinct is prioritised by its inclusion in the initial precincts.

#### **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 and requiring new development to be designed to minimise noise impacts.

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". Our client is concerned that the identification of the sequencing of release precincts within the SEPP may delay the Mamre Road precinct being rezoned and could be misleading to the community as to when the precinct should be developed for the identified use. The development of the intended land uses within the Aerotropolis will be driven by private investment and partnerships. It will be important for the Department to facilitate the rezoning of land and development, such as the development of the Mamre Road Precinct for warehousing and logistics uses, which is consistent with existing strategic planning documents, particularly where there is opportunity to do so in the shorter term.

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

The 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*.

Our client is 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 and the continued supply of land. The proposed process, once drafted, should be documented for public review and comment including indicative timeframes to progress "out of sequence proposals". Development which fulfils the LUIP assessment criteria and demonstrates consistency with the strategic planning for the Aerotropolis and the Western Parkland City should not be delayed.

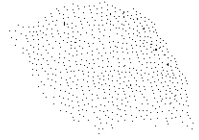
We look forward to further working with the Department regarding the future planning of the Western Sydney Aerotropolis.

Yours sincerely,



**Michael Tilt**  
Chief Executive Officer

1. The first part of the document is a list of names and titles, including "The Hon. Mr. Justice G. D. C. O'Connell" and "The Hon. Mr. Justice J. J. O'Connell".



2. The second part of the document is a list of names and titles, including "The Hon. Mr. Justice J. J. O'Connell" and "The Hon. Mr. Justice J. J. O'Connell".