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From: system@accelo.com on behalf of Chris Stewart
Sent: Tuesday, 6 November 2018 4:03 PM
To: [REDACTED]
Subject: Submission Details for company Wollondilly Shire Council (org_comments)
Attachments: 293545_GOV Submission Details for Wollondilly Shire Council 20181106.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements:

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Content:
Please see attached.

IP Address: [REDACTED]
Submission: Online Submission from company Wollondilly Shire Council (org_comments)
https://majorprojects.accelo.com/?action=view_activity&id=293545

Submission for Job: #9552
https://majorprojects.accelo.com/?action=view_job&id=9552

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

Our Reference: TRIM 10735 CS:SG

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

25 October 2018

Dear Sir or Madam

DRAFT WESTERN SYDNEY AEROTROPOLIS STAGE 1 LAND USE AND INFRASTRUCTURE IMPLEMENTATION PLAN

I write in respect to the public consultation period for *The Stage 1 Plan for the Western Sydney Aerotropolis* and raise the following matters.

Area to which the Western Sydney Airport (WSA) Growth Area, State Environmental Planning Policy (SEPP), Land Use and Infrastructure Implementation Plan (LUIIP) and Technical Documents apply

The Aerotropolis presents a number of opportunities and significant challenges for Wollondilly. In a policy context, consideration needs to be given to whether the Stage 1 Plan should expand beyond borders of the WSA Growth Area to align with the suite of other documents likely to be prepared by the Department of Planning & Environment ('Department').

For instance it is anticipated that a State Environmental Planning Policy ('SEPP') will apply to land within Wollondilly based on the Australian Noise Exposure Concept (ANEC), flight movements, and obstacle height limits.

It is also anticipated that the local and regional infrastructure located within our Shire will be impacted by development pressure associated with the WSA Growth Area. A mechanism is required to augment our local and regional infrastructure using contribution funding collected from the development within the WSA Growth Area.

In this regard there needs to be a clear line of sight for all strategic planning and technical documents.

Better Connections and Public Transport (electrified rail) to Wilton

Council has advocated strongly for improved infrastructure delivery as part of planning for the Wilton Priority Growth Area ('WPGA'). This includes electrified rail via the existing Maldon-Dombarton Rail Corridor which would link the Illawarra to Western Sydney via Wilton.

The Stage 1 Plan should highlight the need for expenditure to develop a business case for electrified rail to Wilton in order to realise the significant opportunity to connect the new Airport to the Illawarra and service the significant growth planned for the Greater Macarthur Area.

Adequate public transport is a critical issue given the success or failure of the Aerotropolis depends largely upon the connectivity of the precinct within the regional context. Failure to integrate the precinct with outlying growth areas and regional centres would be an unfortunate but avoidable missed opportunity.

The role of Local Government

Council recently wrote to the Federal Minister seeking more active involvement in planning for the new Airport, including representation on FOWSA given the direct and indirect impacts and the opportunities within the Shire.

This possibly could be extended to surrounding local government areas located in the Illawarra, Central Coast and Hunter Regions.

Proposed Precincts

The concept of the proposed Agribusiness Precinct is strongly supported by Council. It will assist in achieving key principles outlined in Council's Community Strategic Plan. The Agribusiness Precinct needs to be supported by rational investment in infrastructure, such as a second crossing of the Nepean River and protected from urban encroachment. This includes being considerate of biosecurity, water access and demand, competition and land use conflict.

The document should be clear in its consistency with the principles for the Metropolitan Rural Area outlined in the Western City District Plan.

Out of Sequence proposals

Based upon the recent rezoning of the Wilton South East Precinct, concern is raised in regard to out of sequence rezoning of land in the WSA Growth Area.

Clear protocols for managing out-of-sequence development need to be articulated in the Stage 1 Plan. This includes establishing a process and evaluation criteria for how out-of-sequence proposals may be considered. This needs to manage expectations from landowners and property speculators that land identified within the Agribusiness Precinct is not merely urban development land in waiting.

It is unclear, whether this process would only apply to land within the WSA Growth Area, or whether this could extend to land covered by a SEPP (i.e. land in Wollondilly). It needs to be very clear how these proposals will be considered, and by whom and ensure probity procedures are in place.

Any process that creates uncertainty of the long term strategic value of land for agribusiness will ultimately result in the permanent loss of productive agricultural land. Agricultural and horticultural land within close proximity to the Aerotropolis needs to be considered a precious and finite resource which is critically important for employment and economic development.

Noise impacts

It is noted that there are no current planning controls within Wollondilly Local Environmental Plan, nor any overarching SEPP to address current land uses within areas subject to ANECs. These should be developed as part of the Stage 1 Plan.

Urban Development Zone

Wollondilly Shire Council has provided comment previously to the Department on the proposed use of this zone in the WPGA. While it has some merit, the use of this zone must be supported through strong planning framework to ensure a robust assessment and approval process. Its implementation within the WPGA has been poorly conceived, does not ensure high quality development outcomes and is presenting barriers to the timely assessment and approval of development applications.

While the Stage 1 Plan acknowledges successful implementation of Urban Development Zones (UDZ) in other jurisdictions, the experience in WPGA is that there is a lack of understanding of how an UDZ works and how it delivers flexibility without compromising quality planning outcomes.

The planning framework for how use of this zone is implemented lacks detail and a clear line of sight from proposal, through assessment/consultation and approval by local council and the NSW Government.

There must be a commitment in place to ensure that local councils lead critical precinct planning work in partnership with proponents to achieve the desired land use and built form outcomes.

Without a strong overarching framework, the flexible zone will not achieve the desired outcomes. The Department is encouraged to withdraw the UDZ proposal from these plans and promote its use through a separate planning reform process. This would involve benchmarking the proposed planning framework against other jurisdictions to show how it will deliver a similar beneficial outcome.

Funding of Infrastructure

At its Ordinary Meeting held 16 April 2018, Council resolved to write to the Minister for Education raising the need for a High School to be built in the North Ward of Wollondilly. The need has been identified based upon the projected growth in the area and the significant distances North Ward students are required to travel to access secondary education. Specifically Council request that a future high school be identified either in The Oaks or Silverdale. This should be factored in to any planning work within the WSA Growth Area.

Health Services

Council has advocated for an integrated health care precinct at Wilton to support the significant growth planned by the NSW Government. It is noted that the Stage 1 Plan suggests:

"that NSW Health is investigating a site for an integrated health facility within the Growth Area in a metropolitan or strategic centre location supported by public transport and that it could serve up to 250,000 people from around the Western Parkland City".

Council advocates that appropriate commitments to health services at Wilton and that any planning in this growth centre be consistent and collaborative with planning at WPGA.

A roadmap to make the Aerotropolis development ready

Concern is raised that the initial precincts appear to have 'precinct planning' and rezoning occurring prior to the infrastructure contributions framework being finalised. Precinct planning and a contributions scheme should be finalised before landowner proposals are submitted.

Yours faithfully



Chris Stewart
Director Planning
WOLLONDILLY SHIRE COUNCIL