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01 February 2021

Mr Andrew Jackson
Director, Planning Partnership
PO Box 257
Parramatta, NSW 2124

Dear Andrew,

SUBMISSION ON THE DRAFT AEROTROPOLIS PRECINCT PLANS

This submission has been prepared by Urbis Pty Ltd (**Urbis**) on behalf of CSR Building Products Pty Ltd (**CSR**) in response to the release of the draft Aerotropolis Precinct Plans (**Precinct Plans**). CSR welcomes the opportunity to comment on the Precinct Plans and seeks a partnership on the delivery of Aerotropolis Core and Badgerys Creek precincts. It is critical to ensure the Precinct Plans provide the right balance to enable flexibility in planning controls to deliver development on-the-ground tomorrow but not preclude each precinct's ability to contribute to the Western Parkland City vision.

CSR congratulates the Western Sydney Planning Partnership (**WSPP**) on releasing the draft Precinct Plans. It is recognised that the Precinct Plans are one of the remaining statutory requirements in the *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (Aerotropolis SEPP)* to enable lodgement of development applications to the respective consent authority. Therefore, it is imperative to ensure the Precinct Plans enable the delivery of enterprise uses, to facilitate investment around the Western Sydney Airport, and create the building blocks for this area to transform into Sydney's third CBD.

This submission has been divided into the following key sections:

- **About CSR:** Overview and history of the client and its site in the Aerotropolis Core;
- **Comments and recommendations on the Precinct Plans;**
- **Conclusion and Next Steps:** Discussion on the appropriate next steps to resolve the Precinct Plans.

ABOUT CSR

CSR is a major Australian industrial company producing building products to support the delivery of development across a variety of portfolios including residential, multi-residential and commercial construction.

In October 2016, CSR acquired Boral Bricks Pty Ltd (**Boral**) brick business, which included a brick making facility at Badgerys Creek. This site is strategically placed in the Western Sydney Aerotropolis and the Western Sydney Airport borders the site to the west.

CSR is repositioning the development of the site as it transitions to longer-term uses as envisioned by the NSW Government and WSPP. Therefore, CSR is invested in the success of the Western Sydney Aerotropolis, and seeks the following comments and recommendations to be addressed prior to finalisation.

COMMENTS AND RECOMMENDATIONS ON THE PRECINCT PLANS

The WSPP release of the Aerotropolis Precinct Plans is welcomed. However, the current state of these Precinct Plans is not acceptable and must be amended prior to finalisation. In particular, the WSPP must recognise the significance of applying statutory weight via the Aerotropolis SEPP, the lack of evidence-based planning, and lack of consideration for cadastral boundaries. The following sections provide a detailed response to these matters and requests the WSPP to amend the Precinct Plans based on the following recommendations.

Role of the Precinct Plan

The gazettal of the Aerotropolis SEPP elevated the role and function of a Precinct Plan via the Aerotropolis SEPP. Clause 41 in the Aerotropolis SEPP states the following:

Development consent must not be granted to development on land to which a precinct plan applies unless the consent authority is satisfied that the development is consistent with the precinct plan.

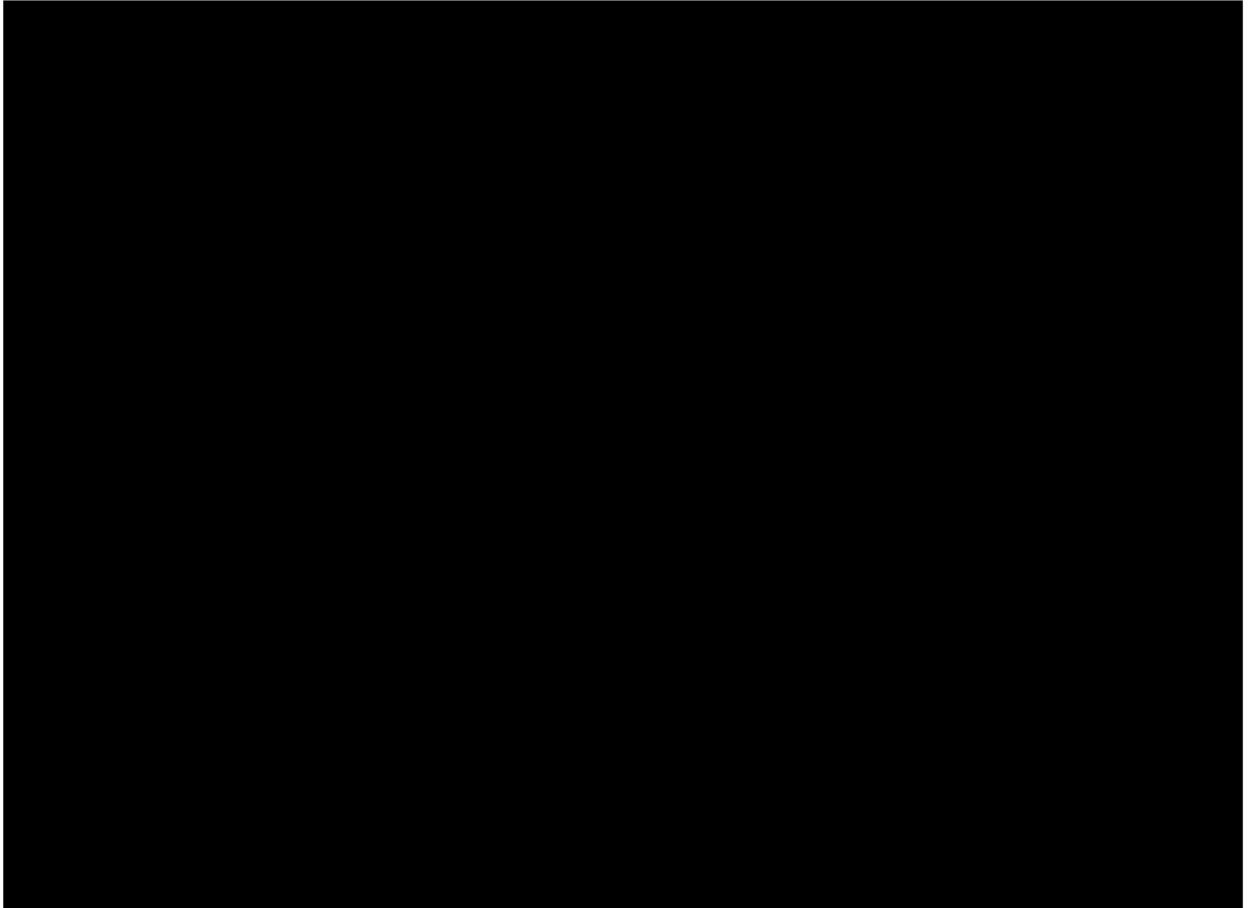
It is understood the intent of a precinct plan is to provide a guide to how development patterns should occur to achieve the 2056 vision of the precinct. However, the WSPP must recognise on-the-ground development delivered tomorrow will not reflect the development patterns shown in the Precinct Plans. In order to achieve a fine-grained road pattern with higher order uses as shown on the Precinct Plan, land surrounding the Western Sydney Airport must undergo several development cycles. The current statutory weight of the Precinct Plans and the detail contained in them will prevent investment in the Aerotropolis in the short and medium term.

Therefore, it is recommended for the WSPP to adopt the following recommendations:

Recommendations:

1. Remove the statutory weight of the Precinct Plan.
2. Amend Clause 41 to require development to demonstrate consistency with the Precinct's vision and objectives. This applies a principles-based approach versus reliance on a detailed precinct plan that will become redundant as further information becomes available.
3. If the WSPP requires application of Clause 41 as it currently stands, it is imperative to remove the fine grain detail shown on the Precinct Plan, and adopt a high level structure plan for each precinct. This approach reflects the NSW Government's approach to Wilton Growth Area. **Figure 1** below demonstrates how this approach can be shown in relation to CSR's site.
4. If none of the three recommendations above are adopted, then the WSPP must work with developers on proponent-led masterplans as a matter of urgency.

Figure 1 Recommended Precinct Plan Layout



Consistency between Zoning and Precinct Plan

The adoption of urban development zones within the Aerotropolis SEPP sought to minimise spot rezonings and provide the market flexibility to respond to demand. The detail contained in the Precinct Plan diminishes the effectiveness of the urban development zones as it identified specific land uses, such as light industry and enterprise centre (refer to **Figure 2** below).

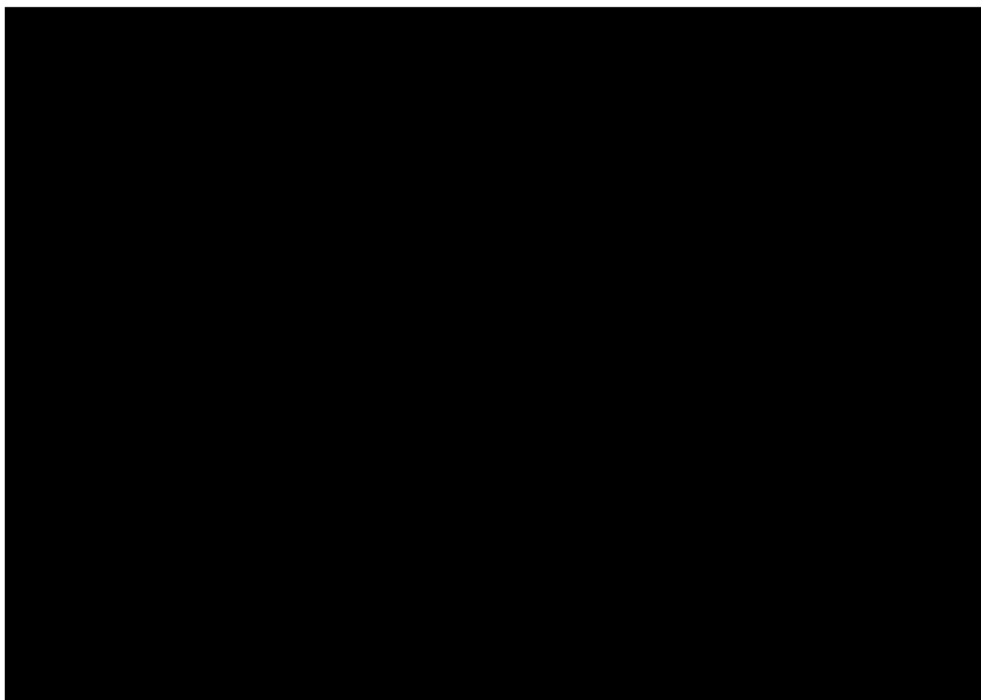


Figure 2.1 SEPP (WSA) 2020 – Land Zoning Map

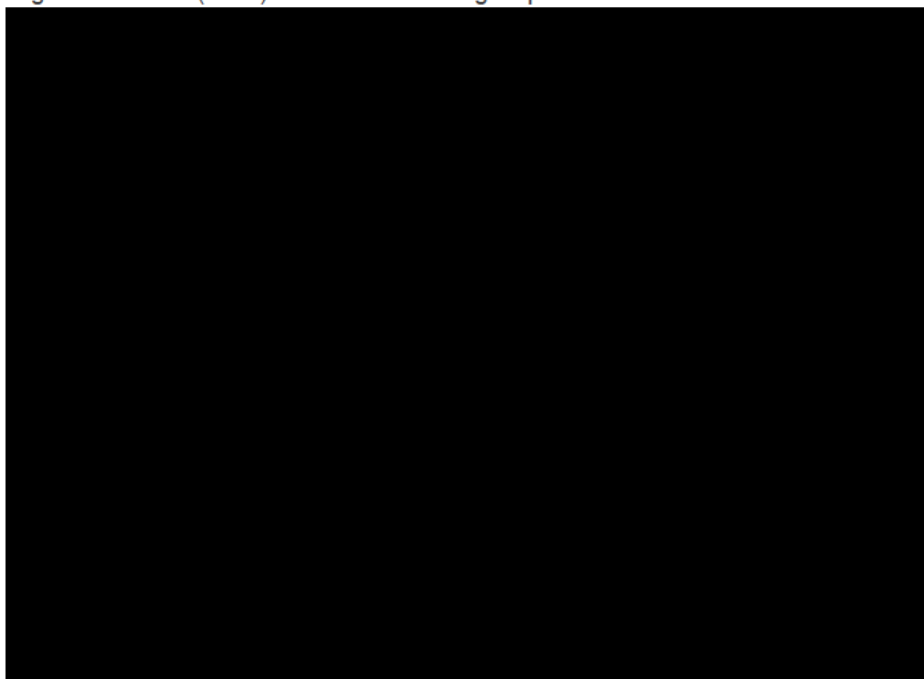


Figure 2.2 WSA Draft Precinct Plan – Land Use Plan

Source: NSW Legislation/ Planning Partnership; Western Sydney Aerotropolis Urban Design and Landscape Plan Report, Draft for Public Comment

This detail should be removed from the precinct plan. It should be up to the market to determine the type of land uses and their location within the context of the Precinct Plan. By detailing land use types in the Precinct Plans, it prevents innovation and market response to investment in the Aerotropolis.

Recommendation:

5. The Precinct Plan must remove detail of land use types and their location in the precinct, as it is in conflict with the intent of the urban development zone. Land uses should be dictated by the market and evidence-based technical investigations at the DA stage.

Evidence-Based Urban Design and Planning

In addition to the matters outlined in **Section 2.2**, the application of land uses across the Precinct Plans is deemed premature. Based on the exhibition package, there has been limited analysis into the existing conditions and identification of future needs for the precincts. The lack of evidence-based investigations calls into question whether the Precinct Plans appropriately reflect the existing conditions and future needs to facilitate delivery on an Aerotropolis. For example, the following matters have not been appropriately addressed in the Precinct Plan:

- A robust analysis documenting the relationship of transport corridors with land uses. It is integral to ensure appropriate land uses are adjacent to corridors to minimise negative externalities, such as noise, but also create an activated space where people and public transport can interact in an engaged and safe manner.
- The location of centres do not relate to major roads or public transport infrastructure. A Precinct Plan must demonstrate accessibility to and from centres, and tenants require visibility from major roads. Centres located on the fringe of urban development are not economically viable, and do not promote accessibility for users.
- There is limited analysis into the quantum and location of open space across the Precinct, especially in employment areas. Employment areas should not be required to provide similar open space requirements to mixed-use areas. The identification of open space in Enterprise zoned areas in the Precinct Plan should be removed.

Commercial and industrial developments through detailed design will identify the quantum of open space required to support future employees, and appropriately provide the need in their development. In addition, the Precinct Plans must recognise the role of Wianamatta-South Creek Precinct, which focuses on recreation and environmental amenity for the Western Sydney Aerotropolis.

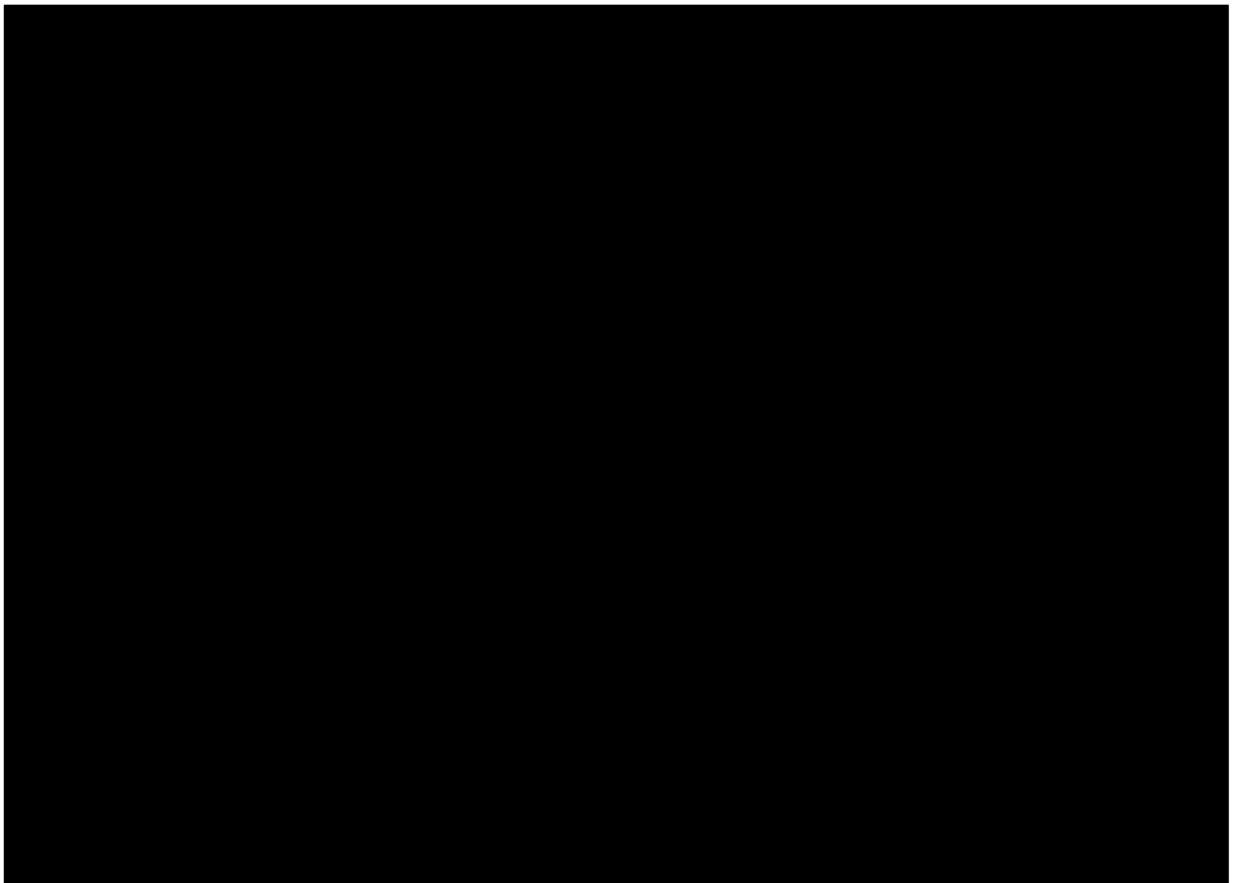
- In addition to open space, there is limited rationale why schools and sporting fields are to be located within employment areas. These uses must be located close to their end users, which are the future residents within the Aerotropolis. Therefore, these uses must be removed from Enterprise zones and appropriately located within Mixed Use zones in the Aerotropolis Core.
- Finally, the identification of drainage infrastructure is premature. The associated exhibition documents do not provide sufficient analysis for stormwater infrastructure. This infrastructure is best identified at the development application stage, as water cycle management modelling will confirm basin types, sizes and their locations.

Based on the lack of an evidence-based approach, the following recommendations must be addressed prior to finalisation of the Precinct Plans.

Recommendations:

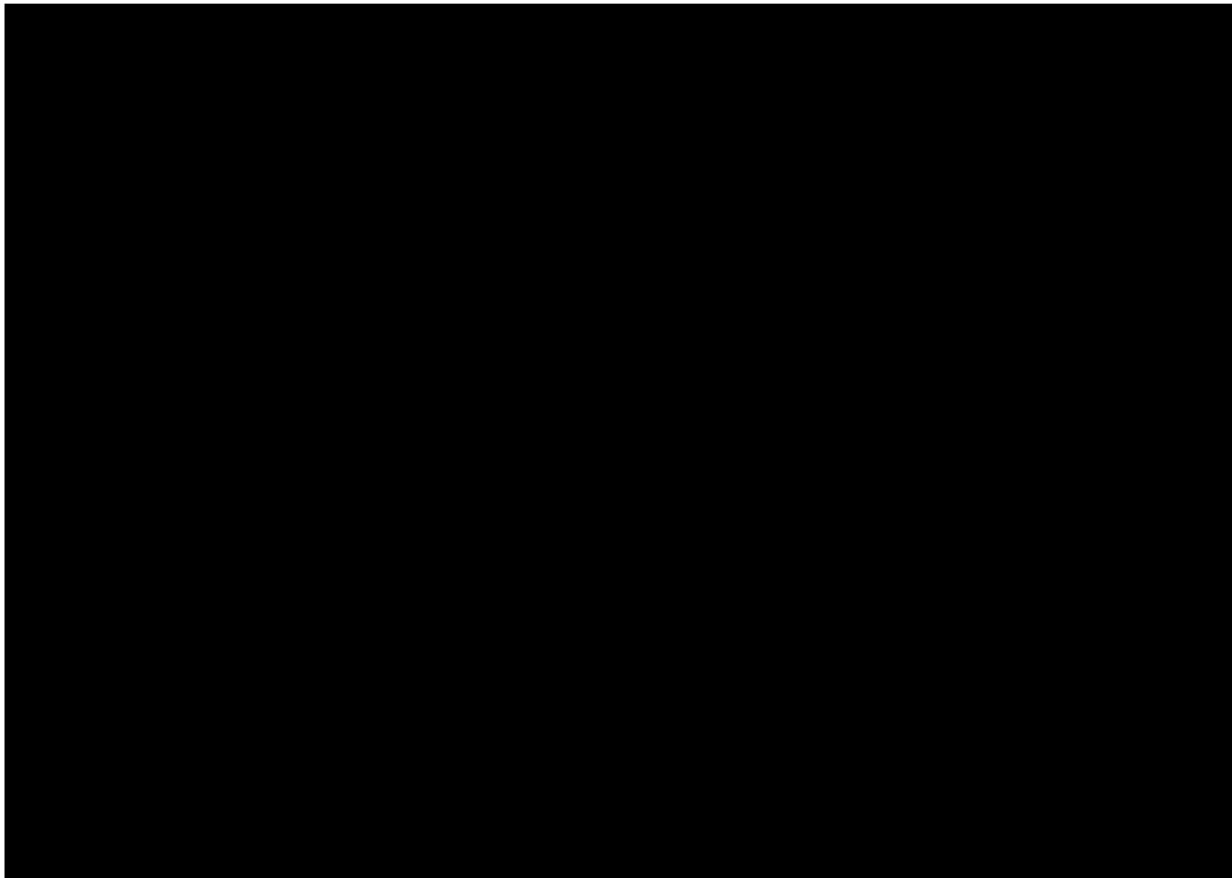
6. The Precinct Plan must remove detail of land use assumptions and their location in the precinct, as it conflicts with the intent of the urban development zone. Land uses should be dictated by the market, as long as they align with the vision and principles contained in the Precinct Plan.
7. Infrastructure such as drainage and open space, should be confirmed at the development application stage. Details of these types of infrastructure must be removed from the Precinct Plans.
8. The Precinct Plan must adopt the approach to land use and open space distribution as shown in **Figure 4** and **Figure 6**.

Figure 3 WSA Draft Precinct Plan - Land Use Plan



Source: Western Sydney Aerotropolis Urban Design and Landscape Plan Report, Draft for Public Comment

Figure 4 CSR Proposed Land Use



Source: Urbis

Figure 5 Draft Precinct Plan - Proposed Open Space Framework

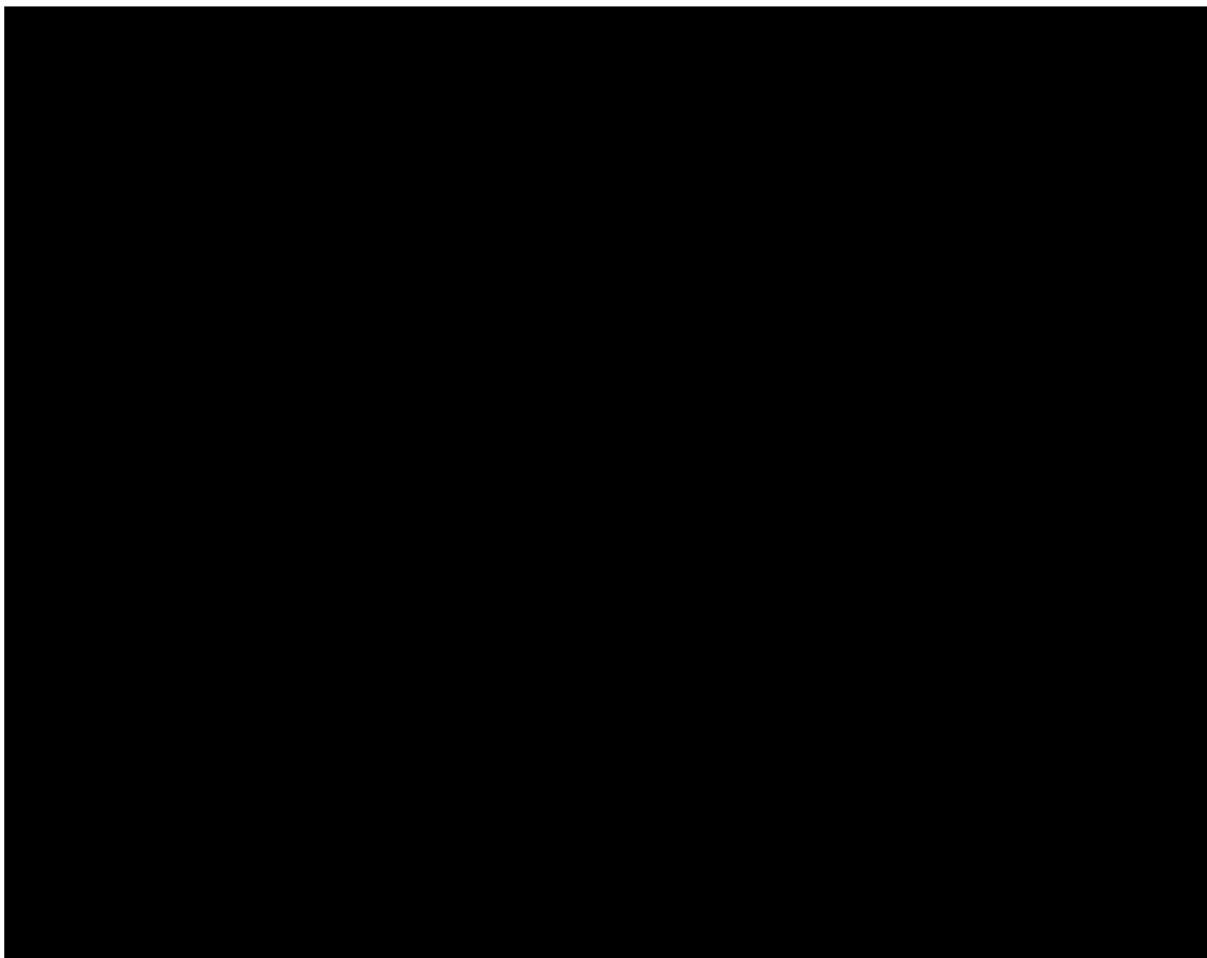
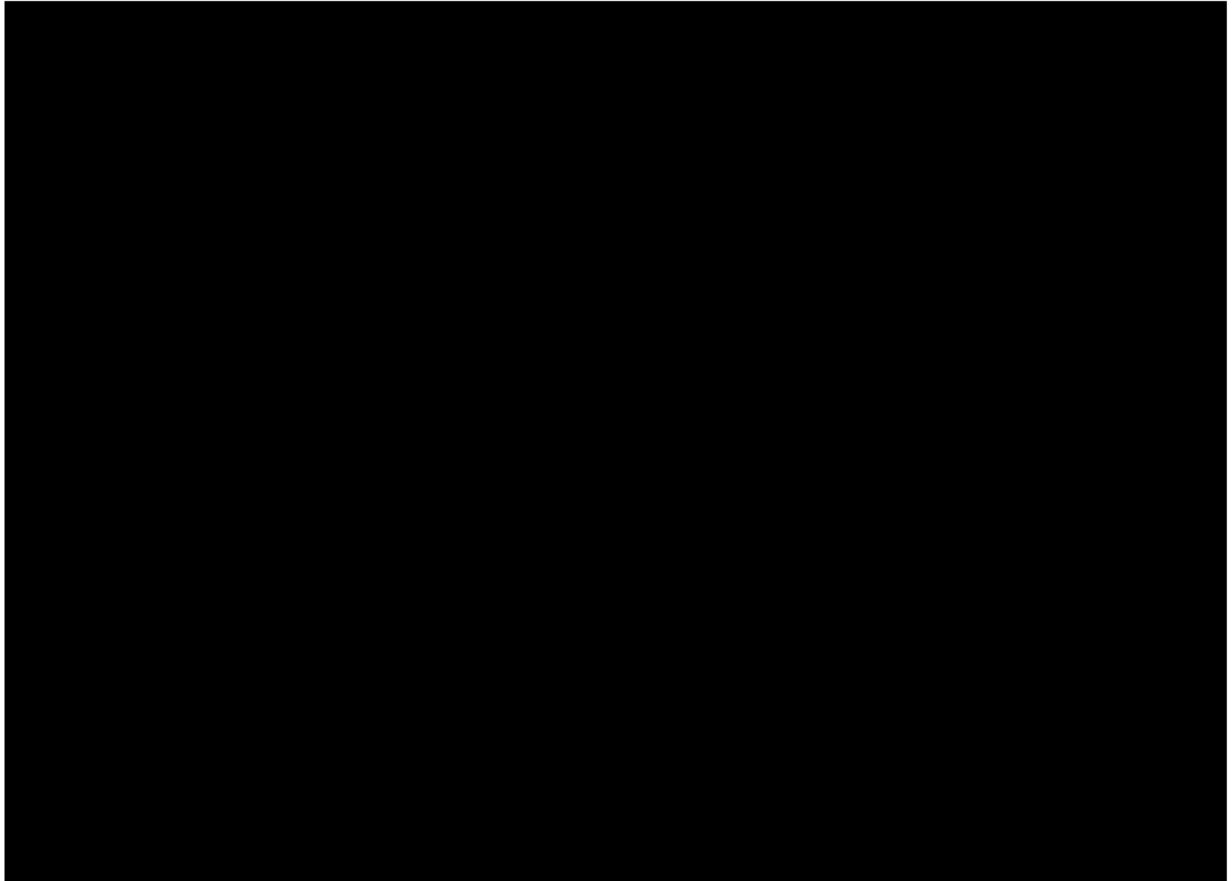


Figure 6 CSR Proposed Open Space Principle



Source: Urbis

Transport Infrastructure

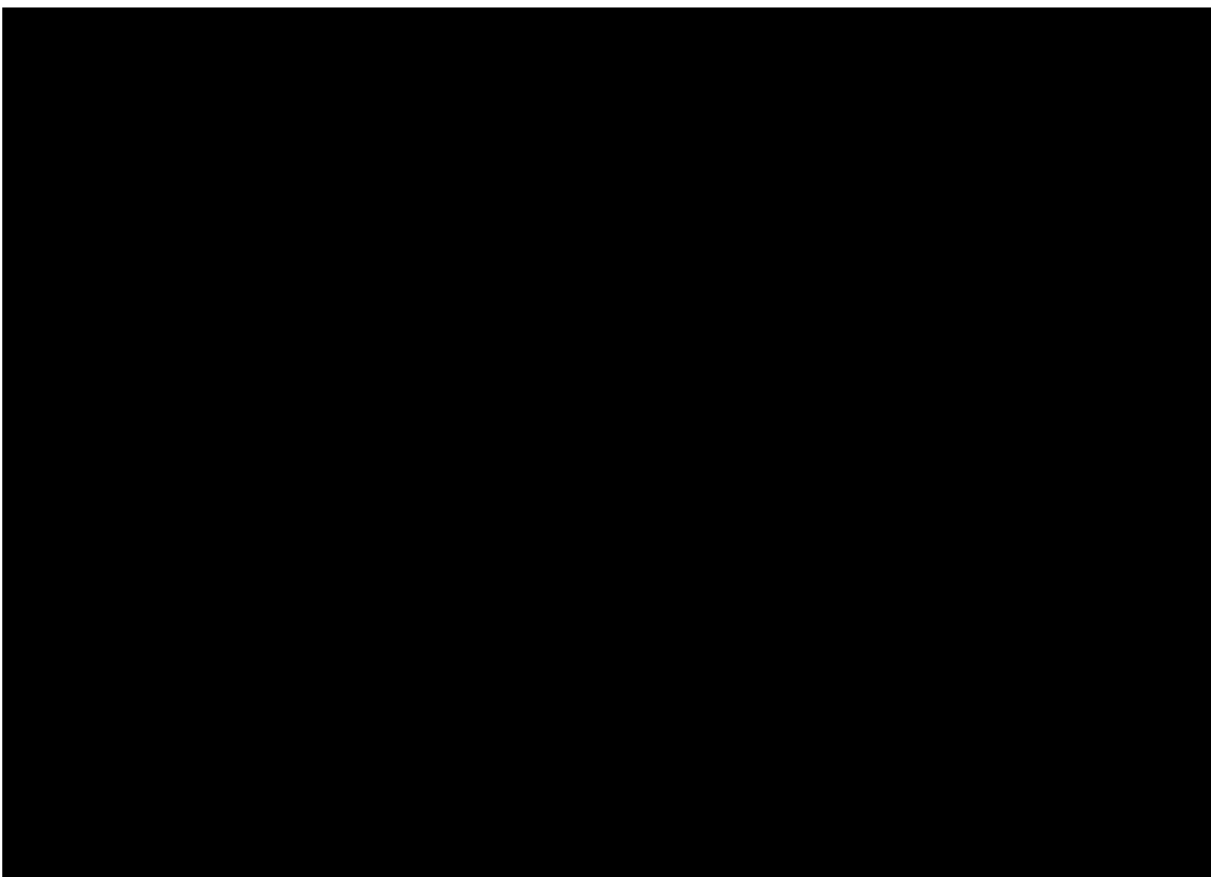
Transport infrastructure is a critical component to the success of the Precinct Plan. The Precinct Plans must consider the role of major roads, their proposed alignments, spacing of intersections, and relationship with built form and the public realm. While the Precinct Plans do document these considerations, it is considered premature as proper investigation into transport corridors has not commenced.

In particular, it is concerning that the Precinct Plans are dictated by wide road reservations, which create barriers and dividers across the precinct. This will not create good design outcomes and does not align with the vision of the Western Parkland City and the Western Sydney Aerotropolis. In addition, it leads to inefficient outcomes on operations and movements. There are more efficient road reservations, which require less land take and provide better outcomes in relation to traffic movement and place.

In addition to road width requirements, the Precinct Plans do not recognise the risk associated with key road corridors and fragmented land. The Eastern Ring Road has the ability to be compromised due to significant land fragmentation. The Precinct Plan must recognise interim options to deliver partial road corridors in the short and medium term, while also preserving the full road reserve widths as funding is allocated and acquisition can proceed. A significant opportunity for the short term is

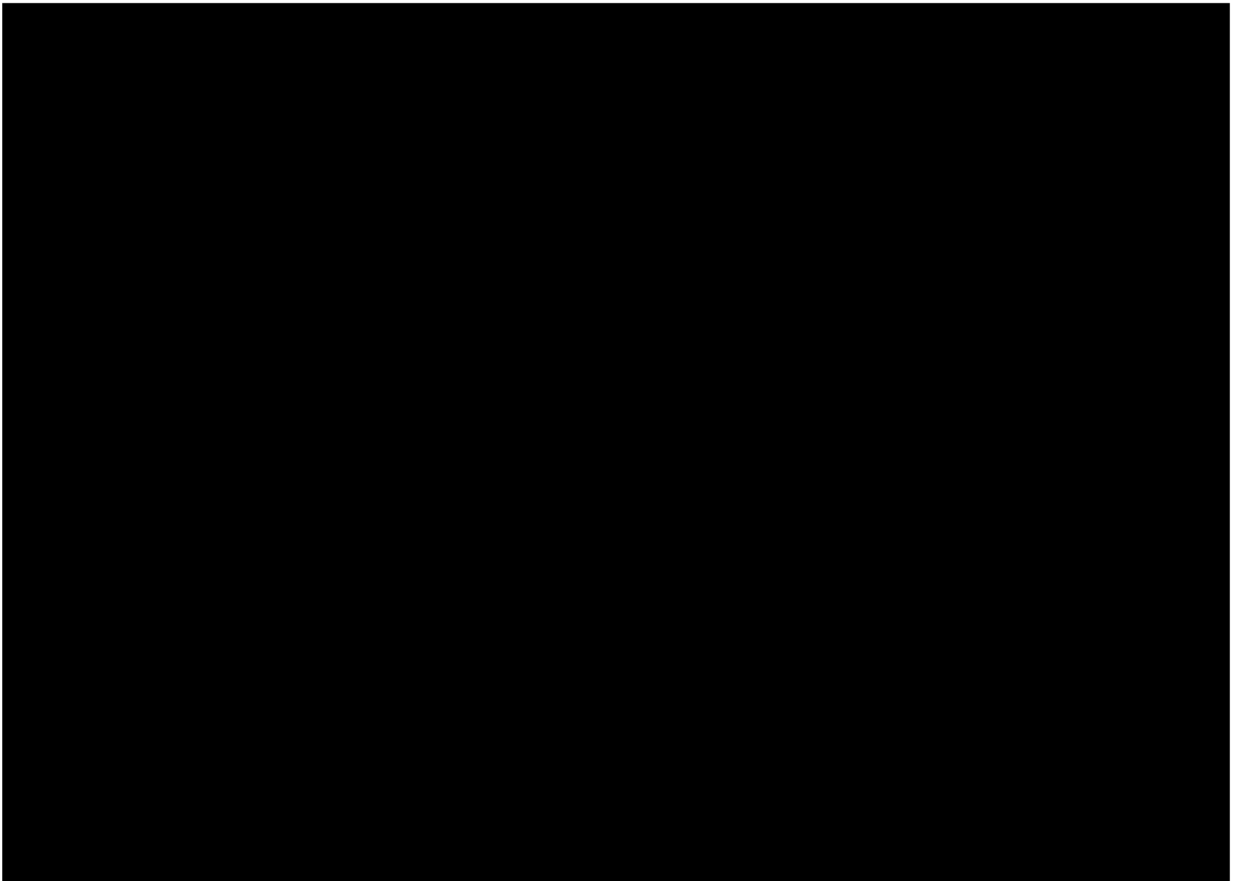
retaining the function of Badgerys Creek Road. With the second runway anticipated to be delivered in 2050, it provides the opportunity for Badgerys Creek Road to provide interim access until Eastern Ring Road is acquired and funding is received to construct the corridor.

Figure 7 Draft Precinct Plan - Proposed Transport Strategy Plan



Source: Western Sydney Aerotropolis Urban Design and Landscape Plan Report, Draft for Public Comment

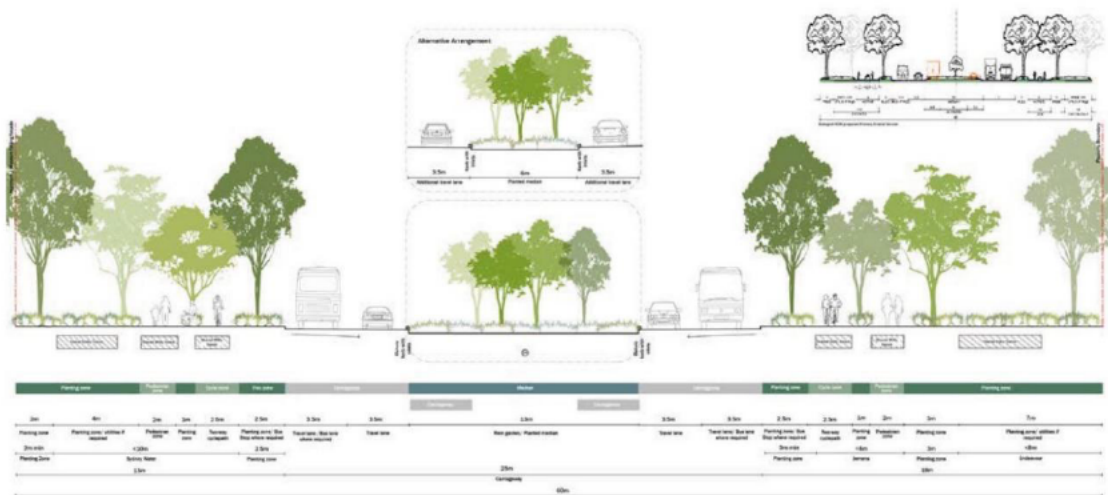
Figure 8 CSR Proposed Transport Strategy



Source: Urbis

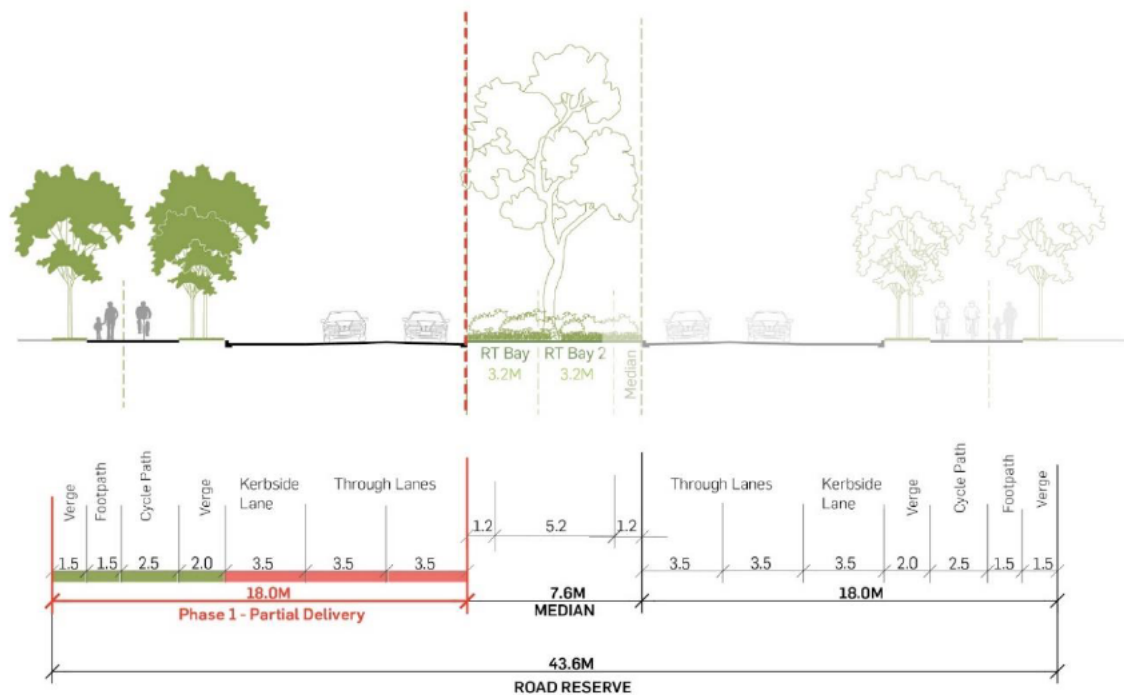
Figure 9 Primary Arterial Road - Road Section

DRAFT PRECINCT PLAN (60M)



CSR PROPOSED

EASTERN RING ROAD/ EAST-WEST CONNECTION (43.6M)



Recommendations:

9. The Precinct Plan must adopt the proposed transport strategy as outlined in **Figure 8** above. The strategy responds to existing conditions within the site, and offers multiple road connections to enable an immediate delivery of the precinct and aligns with the vision of the Western Parkland City.
10. The proposed road reservations within the Precincts Plans are excessive. The proposed Eastern Ring Road section at **Figure 9** reduces acquisition requirements, but meets the objective to promote traffic movements, reduces the road reservations as an active transport barriers, and allows for verges to facilitate delivery of trees in line with the Western Parkland City vision. It is recommended for the WSPP to adopt the proposed road section.

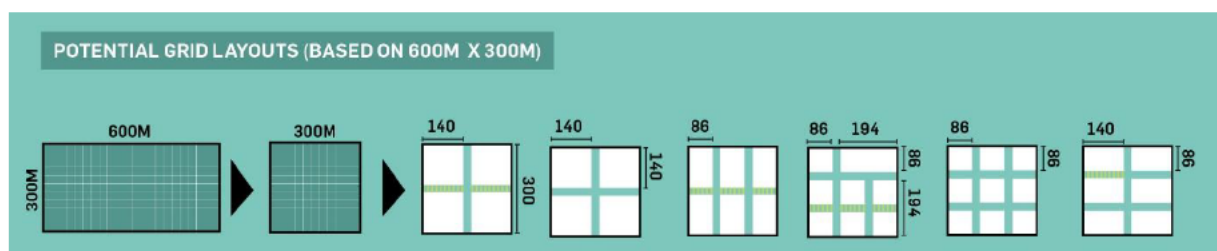
Built Form Controls

The Precinct Plans contain built form parameters to guide development, such as height and floor space ratio. The inclusion of these built form parameters in the Precinct Plan is not appropriate. These controls do not align with industry standards, and are overly prescriptive. Due to the statutory weight of the Precinct Plan, these controls will restrict responses from the market and place risk of lack of investment within the Aerotropolis. The controls are further exacerbated as they are based on the 2056 vision of the Aerotropolis. The controls need to consider first mover land uses within the Aerotropolis, such as warehouse and distribution centres, data centres, and manufacturing uses. The current controls in the Precinct Plan are too restrictive, and do not account for the minimum block size requirements for these uses.

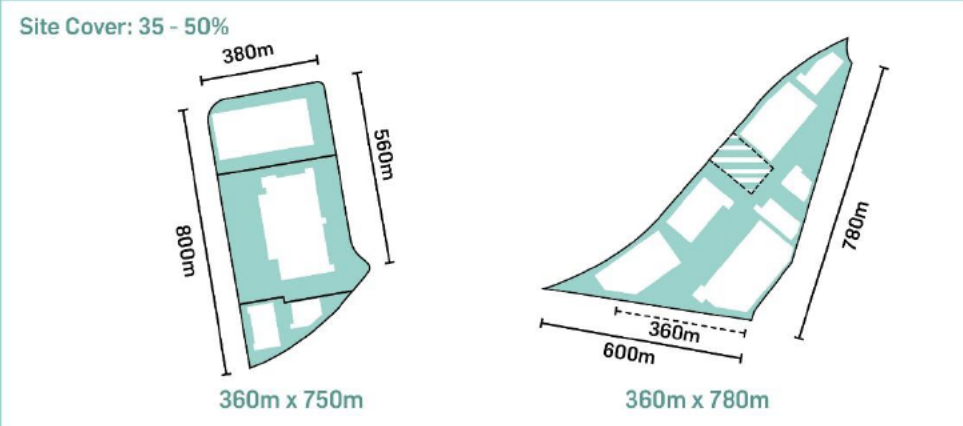
Instead, the WSPP needs to investigate how current controls can facilitate investment in the short term but enable block patterns to be subdivided to create a fine, urban grid in the long term as land uses intensify over time. Urbis has analysed how this can be facilitated within the Precinct, which is shown at **Figure 10** below.

The Precinct Plans should adopt principles on how block patterns and built form controls should adopt over time, as demonstrated below. In addition, the built form controls should be removed from the Precinct Plans and implemented through the Phase 2 Development Control Plan (DCP). By inserting into the Phase 2 DCP, it provides the consent authority guidance on built form controls but does not restrict development to innovate to meet market demand.

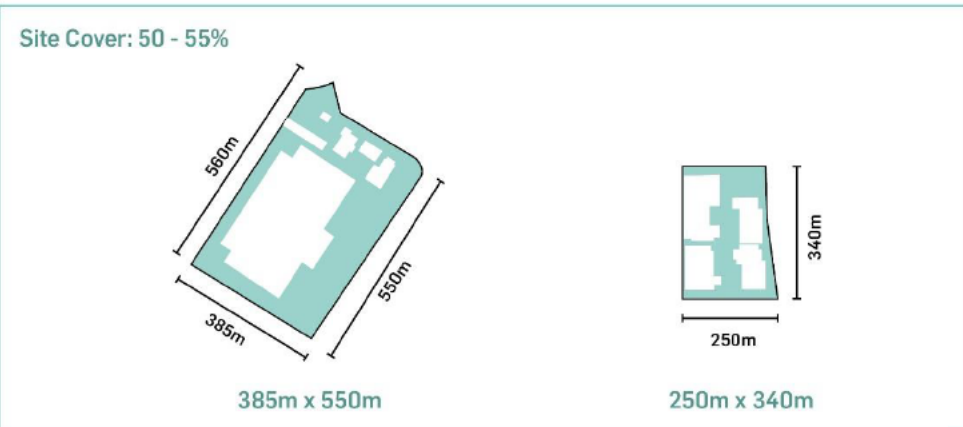
Figure 10 Evolution of Urban Development in the Aerotropolis



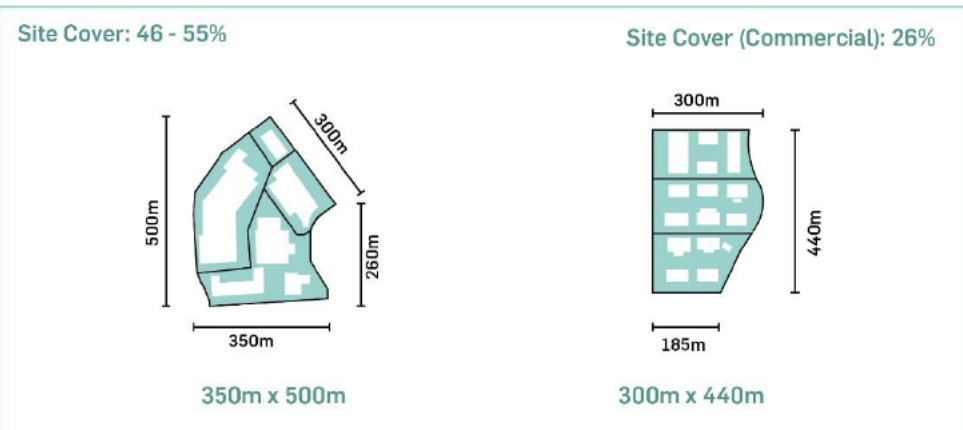
OAKDALE WEST INDUSTRIAL ESTATE, NSW



EASTERN CREEK BUSINESS PARK, NSW



CARIBBEAN PARK, VICTORIA



Source: Urbis

Recommendations:

11. The Precinct Plan must remove built form parameters from the precinct plan. These controls must be contained in the Phase 2 DCP. By inserting into the Phase 2 DCP, it provides the consent authority guidance on built form controls but does not restrict development to innovate to meet market demand.
12. The Precinct Plan must recognise the Aerotropolis will be delivered through development cycles. The urban design work by the WSPP must acknowledge how the Aerotropolis intends to evolve and set the framework to enable an industrial use to transform to a higher order use. This is not evident in the exhibition package, and must be addressed.

Urbis has demonstrated how this can occur in **Figure 10**. Urbis and CSR welcome the opportunity to discuss with the WSPP the appropriate application of built form controls across the planning framework in the Western Sydney Aerotropolis to achieve the vision but enable on-the-ground development tomorrow.

Application of Urban Design

The planning of Sydney Growth Areas has been streamlined since the incorporation of the Growth Centres Commission in the early 2000s. A process that involved the engagement of State government agencies, local council representatives and where required, major landowners. The process led to the planning of the South West and North West Growth Areas in a manner that allowed for the planning of key infrastructure. One of the elements that was important for the precinct's success was the development of an Indicative Layout Plan (ILP) that guided the provision of SEPP planning controls such as zoning, building height, environmental and/or density controls.

The ILP were prepared with enough ground truthing and review from technical specialists to understand issues such as:

- location and siting of schools;
- location and alignment of main roads;
- quantity, function and distribution of open spaces;
- servicing strategy;
- Water Sensitive Urban Design; and
- extent of environmental areas.

Important for the development of the ILP was to understand and plan around:

1. Major landholdings, particular if these could influence the delivery of important infrastructure and land uses; and
2. Property boundaries to ensure that infrastructure could be delivered in a staged manner.

As the ILP sits within DCPs, it provides a balance of guidance and flexibility to allow changes over time.

We consider that in the current approach the Precinct Plans have abandoned important learnings from the previous processes as they seek to provide a very rigid layout over the whole Precinct without sufficient knowledge of key constraints and opportunities of urban design elements.

Despite a strong principles-based approach, the Precinct Plans lack significant ground-truthing and consideration for detailed site opportunities and constraints. In particular, cadastral boundaries and ownership patterns have been overlooked. We consider that site ownership is a relevant consideration to enable ease and efficiency in delivery of infrastructure as well as coordination and phasing between landowners. As part of this review and refinement of the Precinct Plans, we recommend that major landowners are engaged in the master plan process to enrich site-specific outcomes for the benefit of development and place outcomes at the Western Sydney Aerotropolis.

In addition to site ownership, it is evident there is a lack of consideration for existing natural topography and landscape features. As an example, within the Aerotropolis Core, a “Hilltop Park” has been identified within a low-lying valley. The plans represent an oversimplification of open space provision and we recommend the open space strategy is reviewed against existing site-specific conditions. Engaging with major landowners as part of this review process will enable a better understanding of local site issues and ways to best manage them.

Recommendations:

13. The Precinct Plan must consider site ownership as a significant consideration for delivery and phasing of roads, infrastructure and land uses.
14. It is critical for the WSPP to engage with major landowners as part of the Precinct Plan and masterplanning process to ensure site specific opportunities and constraints are considered. Local knowledge is an essential requirement to enable a successful delivery and implementation of a Precinct Plan.
15. The WSPP must learn from previous precincts in greenfield growth areas. The proposed Precinct Plans run a significant risk of repeating same mistakes such as lack of evidence-based investigations and consideration of cadastral boundaries, which will affect the successful delivery of the Aerotropolis.

Infrastructure Contributions

CSR understands the requirements of infrastructure across Western Sydney and the demand it places on State and local government agencies to facilitate the timely delivery to unlock land for urban development. The use of a contribution plan to levy funds for infrastructure delivery is understood, however, both State and local governments need to holistically look at the cumulative effects of multiple contributions and how they affect feasible development outcomes.

At the time of this Precinct Plan exhibition, both State and local governments proposed to overhaul the infrastructure contribution by proposing the following:

- Section 7.12 Plan for the Western Sydney Aerotropolis: 6.5% levy on capital investment value
- Western Sydney Aerotropolis SIC: \$200,000/ ha of net developable area
- Western Sydney Growth Areas SIC: contribution is required under this SIC but is reduced by 74% if in industrial area. This is estimated to be \$24,987.56/ ha of net developable area.

The WSPP must work with the Department of Planning, Industry and Environment and Liverpool City Council to ensure there is a balance between infrastructure contributions and delivery of development. An analysis of the proposed infrastructure contributions to the current industrial market indicates a significant impact on Sydney's ability to attract industrial tenants compared to Melbourne and Brisbane. This is outlined below.

Economic Analysis on the Industrial Market

Sydney is Australia's most expensive industrial markets with rents currently averaging \$153 per sq.m. In comparison, Sydney's two main competing industrial markets of Melbourne and Brisbane are achieving average industrial rents of only \$113 and \$111 per sq.m, respectively. While Melbourne and Brisbane's industrial rents per sq.m are fairly similar, Sydney's industrial rents per sq.m are \$40-42 per sq.m higher, which reflects a 35-38% premium.

Furthermore, Sydney's strong industrial rent growth over the last 2.5 years of 3.6% per annum has far exceeded the rental growth observed in Melbourne and Brisbane of 2.2% per annum and 1.9% per annum, respectively. This indicates that the Melbourne and Brisbane industrial markets are substantially more affordable than Sydney, as shown in **Table 1** below.

Table 1 Comparison of Average Industrial Rents per sq.m (\$ per sqm)

	Q3 2017	Q1 2018	Q3 2018	Q1 2019	Q3 2019	Q1 2020	<i>Average Annual Growth (%)</i>
Sydney	\$140	\$142	\$144	\$151	\$150	\$153	3.6% p.a.
Melbourne	\$107	\$108	\$108	\$111	\$111	\$113	2.2% p.a.
Brisbane	\$106	\$106	\$100	\$110	\$111	\$111	1.9% p.a.

Note: Rents are prime average

Source: Colliers International; Urbis

Sydney already struggles to compete with the Melbourne and Brisbane industrial markets for investment due to much higher rents of some \$40 higher per sq.m. Despite Sydney's large population and the economies of scale and agglomeration benefits it can offer, Sydney underperforms relative to its size, population and location in terms of trade processed. As shown in **Table 2**, Sydney only processes an average of 5 tonnes of goods through its ports and airports per head of population. In comparison, Melbourne processes a much higher 7.3 tonnes per capita while Brisbane processes an even higher 13.5 tonnes per capita.

The proposed increase in infrastructure contributions is likely to result in Sydney's industrial land becoming even less attractive to both investors and tenants, which will further reduce Sydney's competitiveness against Melbourne and Brisbane. This will have flow-on implications as Sydney loses jobs in the industrial and supply chain sectors to Melbourne and Brisbane.

Table 2 Comparison of Trade per Capita, 2018-19

	Total Trade (tonnes)	GCCSA Population (persons)	Trade per Capita
Sydney	26,676,517	5,312,163	5.0
Melbourne	37,248,076	5,078,193	7.3
Brisbane	33,850,676	2,514,184	13.5

*Note: Trade includes goods processed through ports and airports within the Greater Capital Cities (GCCSA)
Source: Port Australia; Australian Department of Infrastructure, Transport, Regional Development and Communications; Urbis*

Higher infrastructure contributions will further push up industrial rents in Sydney as developers seek to maintain their development margins and project feasibilities. If these higher rents per sq.m are achieved then the affordability of industrial land in Sydney will worsen and continue to reduce Sydney's ability to compete for investment against the Melbourne and Brisbane industrial markets.

As a result, prospective and even existing tenants will increasingly choose to locate in Brisbane and Melbourne and the Aerotropolis will not be developed in line with the NSW Government's vision. This will, in turn, negatively impact Sydney's ability to create jobs and economic opportunities.

Recommendations:

16. The WSPP must work with the Department of Planning, Industry and Environment and Liverpool City Council to understand the cumulative impacts of infrastructure contributions. If implemented as it currently stands, investment will choose to locate to more attractive cities, such as Melbourne and Brisbane. This is a significant risk to achieving the Western Parkland City vision, and ensuring the success of the Aerotropolis.
17. The WSPP must consult with industry and landowners to understand the key tenants wishing to locate in the Aerotropolis, and their critical considerations on deciding to invest in a geographic location.

Staging and Sequencing

The WSPP identified staging and sequencing of precincts across the initial precincts. The intent of the sequencing seeks to assist with the additional servicing/ infrastructure requirements for urban land. The priority areas are divided into three stages with the site located in the second priority stage. CSR disagrees with the site's identification in this stage and requests for the WSPP to include the site into the first priority stage as:

- it is a large unfragmented landholding;
- CSR and adjacent landowners have requested the WSPP to work in a joint partnership to prepare a masterplan that meets the vision of the Aerotropolis and enables proactive delivery of land uses surrounding the Airport; and

- the consolidated sites will enable a comprehensive planning and delivery of infrastructure across Badgerys Creek and Aerotropolis Core precinct in the short and medium term.

Recommendations:

18. The WSPP must amend the staging map to include the site within the first priority stage.

CONCLUSION

We look forward to working with WSPP to address key issues raised in this submission. In summary, CSR requests the following recommendations to be addressed prior to finalisation.

1. **Remove the statutory weight of the Precinct Plan.**
2. **Amend Clause 41 to require development to demonstrate consistency with the Precinct's vision and objectives. This applies a principles-based approach versus reliance on a detailed precinct plan that will become redundant as further information becomes available.**
3. **If the WSPP requires application of Clause 41 as it currently stands, it is imperative to remove the fine grain detail shown on the Precinct Plan, and adopt high level structure plans for each precinct. This approach reflects the NSW Government's approach to Wilton Growth Area. Figure 1 above demonstrates how this approach can be shown in relation to CSR's site.**
4. **If none of the three recommendations above are adopted, then the WSPP must work with developers on proponent-led masterplans as a matter of urgency.**
5. **The Precinct Plan must remove detail of land use types and their location in the precinct, as it is in conflict with the intent of the urban development zone. Land uses should be dictated by the market and evidence-base technical investigations at the DA stage.**
6. **The Precinct Plan must remove detail of land use assumptions and their location in the precinct, as it conflicts with the intent of the urban development zone. Land uses should be dictated by the market, as long as they align with the vision and principles contained in the Precinct Plan.**
7. **Infrastructure such as drainage and open space, should be confirmed at the development application stage. Details of these types of infrastructure must be removed from the Precinct Plans.**
8. **The Precinct Plan must adopt the approach to land use and open space distribution as shown in Figure 4 and Figure 6.**
9. **The Precinct Plan must adopt the proposed transport strategy as outlined in Figure 8 above. The strategy responds to existing conditions within the site, and offers multiple road connections to enable an immediate delivery of the precinct and aligns with the vision of the Western Parkland City.**
10. **The proposed road reservations within the Precincts Plans are excessive. The proposed Eastern Ring Road section at Figure 9 reduces acquisition requirements, but meets the objective to promote traffic movements, reduces the road reservations as an active transport barriers, and allows for verges to facilitate delivery of trees in line with the**

Western Parkland City vision. It is recommended for the WSPP to adopt the proposed road section.

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Urbis has demonstrated how this can occur in Figure 10. Urbis and CSR welcome the opportunity to discuss with the WSPP the appropriate application of built form controls across the planning framework in the Western Sydney Aerotropolis to achieve the vision but enable on-the-ground development tomorrow.

13. The Precinct Plan must consider site ownership as a significant consideration for delivery and phasing of roads, infrastructure and land uses.
14. It is critical for the WSPP to engage with major landowners as part of the Precinct Plan and masterplanning process to ensure site specific opportunities and constraints are considered. Local knowledge is an essential requirement to enable a successful delivery and implementation of a Precinct Plan.
15. The WSPP must learn from previous precincts in greenfield growth areas. The proposed Precinct Plans run a significant risk of repeating the same mistakes such as lack of evidence-base investigations and consideration of cadastral boundaries, which will affect the successful delivery of the Aerotropolis.
16. The WSPP must work with the Department of Planning, Industry and Environment and Liverpool City Council to understand the cumulative impacts of infrastructure contributions. If implemented as it currently stands, investment will choose to locate to more attractive cities, such as Melbourne and Brisbane. This is a significant risk to achieving the Western Parkland City vision, and ensuring success of the Aerotropolis.
17. The WSPP must consult with industry and landowners to understand the key tenants wishing to locate in the Aerotropolis, and their critical considerations on deciding to invest in a geographic location.
18. The WSPP must amend the staging map to include the site within the first priority stage.

Next Steps

The previous exhibitions and post-exhibition review have resulted in limited amendments to the Western Sydney Aerotropolis Plan and the Aerotropolis SEPP. Therefore, CSR requests the WSPP to meet with key landowners and developers to resolve the following matters raised in this submission, and seek an agreement to provide industry the confidence on the timing delivery of development and the WSPP assurance the planning framework can successfully respond to market demand in the short term.



Yours sincerely,

A handwritten signature in black ink, appearing to read "Carlos Frias". The signature is stylized with fluid, connected letters and a long, sweeping tail on the final letter.

Carlos Frias
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