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Western Sydney Aerotropolis Precinct Plans Team
Department of Planning, Industry and Environment
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WESTERN SYDNEY AEROTROPOLIS DRAFT PRECINCT PLAN – HANSON SUBMISSION

This submission has been prepared by Ethos Urban on behalf of Hanson Construction Pty Ltd, in response to the Department of Planning, Industry and Environment's (DPIE) release of the Western Sydney Aerotropolis Draft Precinct Plan (Draft Precinct Plan).

1.0 Hanson's Interest in the Aerotropolis

Hanson has identified a pressing short-term need for enabling industries such as concrete batching plants within and around the Aerotropolis. Hanson (together with its subsidiary Hymix) is already supplying concrete for the Western Sydney Airport Early Earthworks package (10,000m³) as well as for The Northern Road upgrades Stage 4 (50,000m³), with Stages 5 and 6 to come. In the longer term, the Western Sydney Airport alone is projected to require almost half a million cubic metres of concrete. Added with the new M12 Motorway, and major upgrades to Elizabeth Drive, The Northern Road, and Stage 1 of Sydney Metro Greater West, millions of cubic metres of concrete will be required around the Aerotropolis in the next 5-8 years. This level of concrete demand will put substantial pressure on the supply capacity of existing local suppliers, and just as importantly, on the arterial road network connecting these batching plants to the Aerotropolis area.

Hanson/Hymix currently serves the Aerotropolis from its closest concrete batching plant at Prestons. The key issue is the lengthy travel time from Prestons to the project site, particularly during peak hour traffic, resulting in significant economic and environmental costs. Critically, from the point of production concrete begins to hydrate and therefore begins to harden. Roads and Maritime Services (RMS) concrete specifications require onsite non-conforming loads to be retempered within 40 minutes of leaving the plant or else they are to be discarded. Concrete being transported from Hanson Prestons to the Aerotropolis is not only in transit for longer than is preferred, spurring on the hydration process, but is unlikely to meet the RMS time specification for retempering. Furthermore, strict RMS temperature specifications are compromised by extended travel times. Non-conforming loads often become landfill – a substantial waste of natural resources, but also a very unnecessary waste of landfill space. The co-location of concrete batching plants close to the Aerotropolis would therefore lead to a more reliable and efficient supply chain resulting in increased certainty, reduced waiting times, better quality concrete, and significantly less wastage – and ultimately, cost savings for proponents and Government in delivering the buildings and infrastructure that will form the backbone of the Aerotropolis.

It is clear that there are therefore significant cost and environmental benefits associated with locating concrete batching plants as close as possible to where the demand is generated. There are also broader sustainability benefits as a result of the significant decrease in construction traffic movements associated with concrete agitator vehicles that will be required to deliver concrete for the Aerotropolis infrastructure. Locating batching plants within the Aerotropolis will result in reduced traffic congestion on key routes between existing batching plants and the project work sites around the Western Sydney Airport, as well as contributing to a smaller carbon footprint per tonne of concrete for the Aerotropolis.

2.0 Hanson's Interest in the Aerotropolis

Hanson own a site at [REDACTED] Lawson Road, Badgerys Creek, which is located within the Badgerys Creek Precinct of the Western Sydney Aerotropolis – as shown in **Figures 1 and 2**. Hanson intends to establish a concrete batching plant at the site, being a facility that will contribute to the construction of the Western Sydney Airport and the surrounding Aerotropolis.

The proposed concrete batching plant would have a production capacity of up to approximately 180,000 m³ of concrete per annum (or some 425,000 tonnes), and would be expected to employ up to 30 people.

The proposed concrete batch plant will be located in a prime location to service the concrete supply demands as detailed above. The road access in and out of the concrete plant is via arterial roads and motorways, which means the raw materials can be readily sourced from Hanson's current quarries located on the outskirts of Sydney in the Central Coast, the Illawarra, and Blue Mountains. The batching plant would result in up to approximately 80,000 truck movements per annum, mainly comprising concrete agitator trucks for outbound products, and B-Double aggregate tippers and cement tankers for inbound materials, or approximately 300 trucks per day. However, the plant would reduce overall traffic impacts associated with delivery of concrete by being located immediately adjacent to the area of demand, thereby reducing the distance travelled by concrete agitator trucks.

The site is long and rectangular with a maximum depth of approximately 330m and a frontage of 60m to Lawson Road, and a total area of approximately 2 hectares. The site is reasonably flat, with a gentle fall away from Lawson Road towards Badgerys Creek. The site contains a single dwelling located near the Lawson Road frontage, with a rural shed behind. The majority of the site is cleared, with a small amount of vegetation scattered around the buildings. The on-site vegetation is not mapped on the Biodiversity Values Map published by the Office of Environment and Heritage. Primary access to the site is gained via a single driveway from Lawson Road, however there are currently no constructed driveways (Lawson Road does not have kerbs and gutters). A detailed aerial map of the site is shown at **Figure 3**.

The proposed concrete batching plant:

- Is at no cost to Government, as it will not require any service upgrades or enabling infrastructure.
- Will facilitate the orderly and efficient development of land – being a land use that is consistent with the Plan (i.e. Industry), as well as by establishing a more efficient construction materials supply chain to support the Western Sydney Airport and the Badgerys Creek Aerotropolis as they develop.
- Is not a noise sensitive use, so will not be adversely impacted by either airport construction activities, or by the future operation of the Western Sydney Airport. In particular we note that the site, along with the immediately surrounding sites, are impacted by the Australian Noise Exposure Concept levels of over 35, meaning they are noise affected.
- Contains structures with a maximum height of 25m above existing ground level, and so are well below the Obstacle Limitation Surface (OLS) for the airport.

The concrete batching plant is therefore an appropriate type of development for the site and the locality.

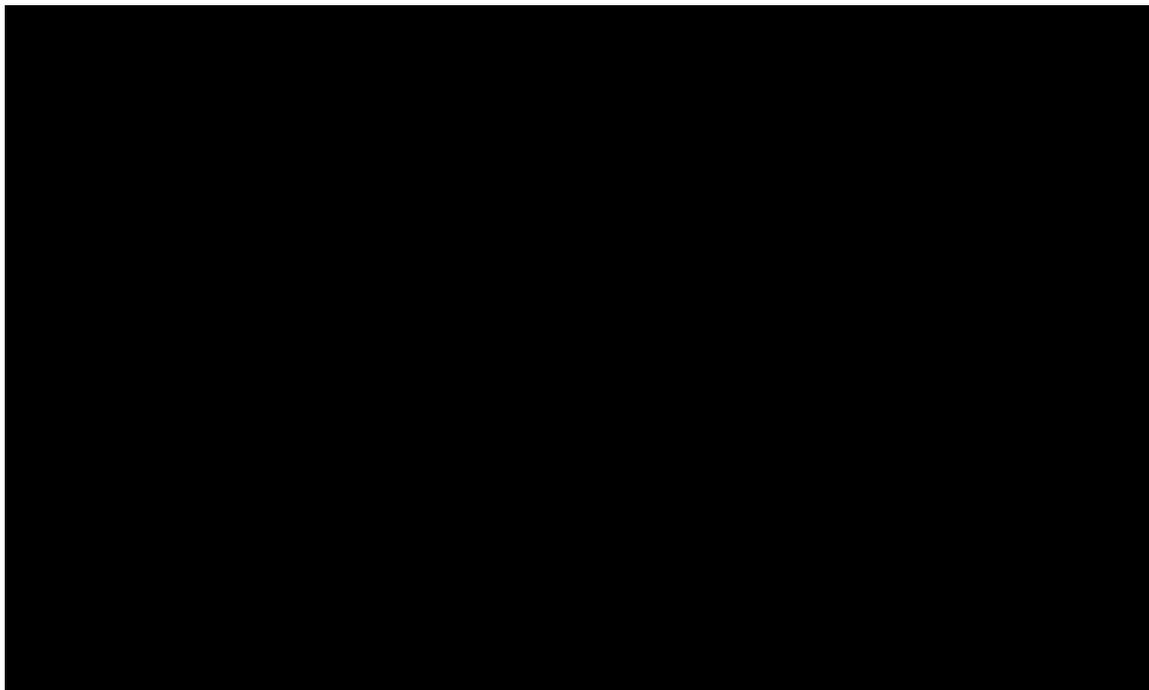


Figure 1: Western Sydney Airport and Badgerys Creek Aerotropolis context map

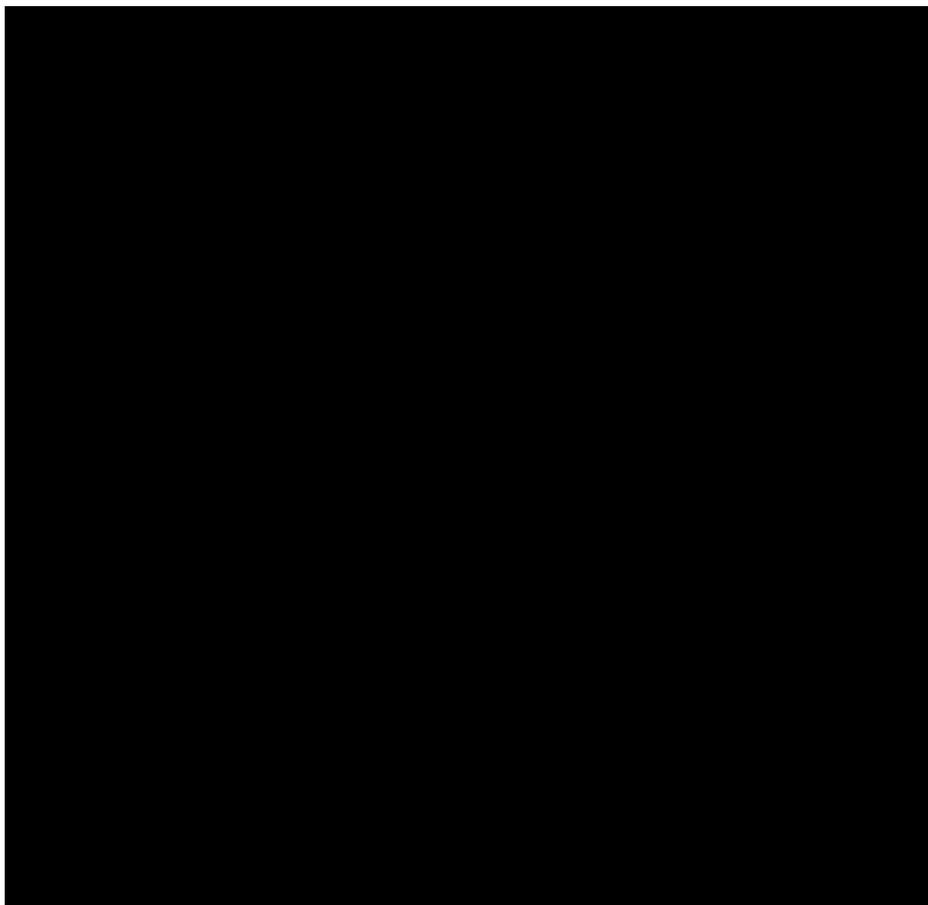


Figure 2: Western Sydney Airport and Badgerys Creek Aerotropolis context map

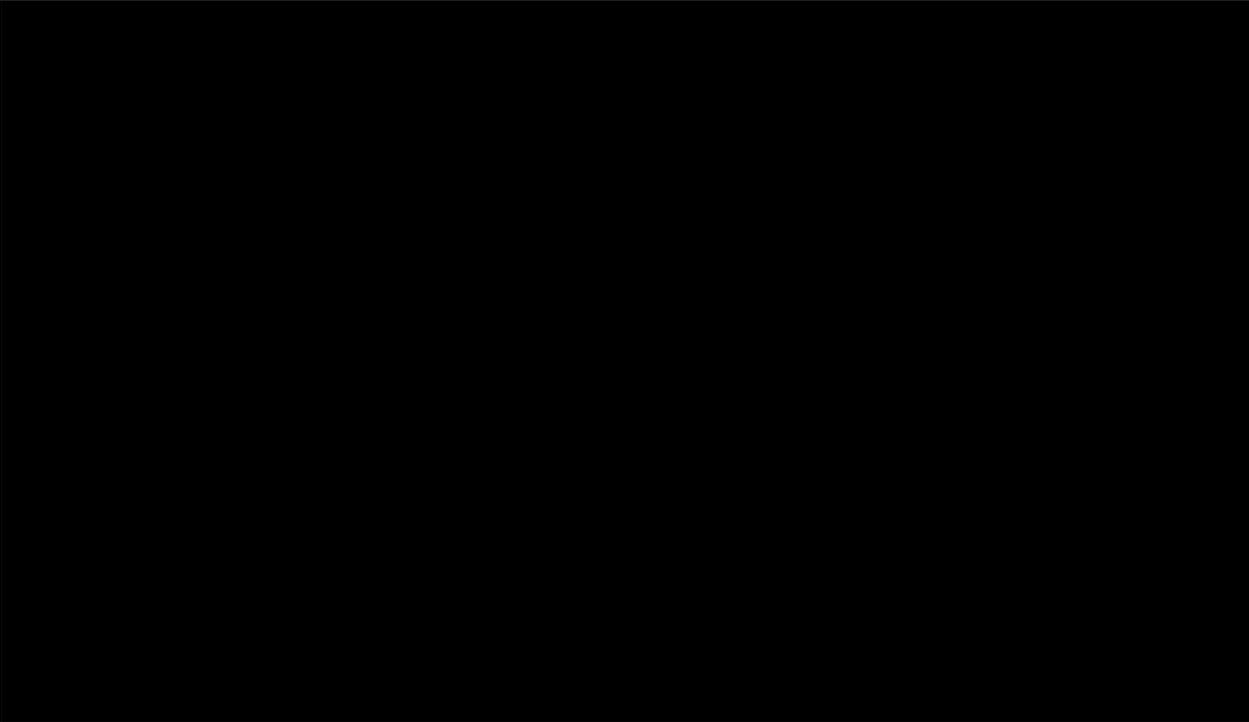


Figure 3: Aerial map of Hanson's site

3.0 The Issues

3.1 Permissibility of General Industry

The Draft Precinct Plan refers to light industry in three locations.

Section 3, Land Use and Built Form Requirements – LU5:

“Apply Enterprise and Light Industry Zones to provide flexibility for low density industrial uses in initial developments, with the land to transition over time for more dense employment.”

Figure 30 ‘Combined Land Use Plan, Western Sydney Aerotropolis’ contains an Enterprise and Light Industry Zone.

Section 3.4.8, Table 6, provides that the “Light industry enterprise: land use” has a maximum subdivision block size of 150x150m.

However, the term ‘light industry’ has never been used before in the *Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan Stage 1: Initial Precincts* of the subsequent Aerotropolis Plan. Further, the term ‘light industry’ is not specified in *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020* (the Aerotropolis SEPP), either as a land use or a zone.

Under the Aerotropolis SEPP concrete batching plants, which are a type of General Industry, are permissible with consent in the Enterprise Zone. However, if the Precinct Plan is finalised in its current form, then it would indicate that development characterised as ‘General Industrial’ might not be consistent with the Precinct Plan, rendering them quasi-prohibited development throughout the entire Enterprise Zone. We do not believe that this was ever the

intention of DPIE, the Western Sydney Planning Partnership, or any of the other planning authorities, as it has never been mentioned in meetings or previously exhibited documents. Indeed, the Western Sydney Aerotropolis Plan, finalised in September 2020, specifically identifies the Badgerys Creek Precinct as a suitable location for this type of industry due to its lower amenity environment caused by airport operations and aircraft noise. As such, we would recommend that references to 'light industry' be removed from the section and figures identified above.

3.2 Facilitating Enabling Industries – Staging and Sequencing

Hanson been consulting with the Western Sydney Planning Partnership since early 2019, with a view to ensuring that the Aerotropolis Plan and Precinct Plans will facilitate the development of enabling industries that will be critical in building and supporting the Aerotropolis – especially in its early years. Every indication has been provided that the Western Sydney Planning Partnership is supportive of the ability to develop these enabling industries, and Section 7.2.4 of the finalised Aerotropolis Plan (September, 2020) specifically identifies that Aerotropolis enabling industries are a desirable land use, and that:

“New enabling industries to facilitate construction of the Aerotropolis may be permitted subject to interface treatments and an ability for the site to transition to higher order uses.”

However, the Draft Precinct Plan makes no provision for the development of enabling industries, and requires that any 'out of sequence' development demonstrate consistency with the Aerotropolis vision, the Precinct Plan objectives and principles, and the achievement of employment targets. As clearly articulated within the finalised Aerotropolis Plan itself, enabling industries such as concrete batching plants are likely to transition to higher order uses in the longer term, and so are unlikely to be consistent with these requirements.

In their current form, the Draft Precinct Plan will therefore significantly impede the early development of the Aerotropolis by implementing controls applicable to a long-term end state development outcome, without making any provision for enabling interim uses that could be delivered in the shorter term.

It is recommended that Section 5.3 of the Precinct Plan be amended to specifically provide for the development of enabling industries where such development is at no cost to government.

3.3 Detailed Land Use Considerations

The Draft Precinct Plan as exhibited is far too prescriptive and contains significant detail that should not be specified at this stage of the planning process. Whilst this may be appropriate for a design-led strategic planning exercise in order to inform a long term vision for the Aerotropolis – the Precinct Plans will be given a statutory basis through clause 41 of the Aerotropolis SEPP. The inappropriate detail set out in the Draft Precinct Plan includes a very fine grained street pattern, areas of local open space, and building envelopes that do not follow current property boundaries.

We also note that the Badgerys Creek Precinct appears to have been planned as part of the Aerotropolis Core and South Creek Precincts, notwithstanding its significantly differing future land use and development outcomes as articulated in Section 7.2.4 of the Aerotropolis Plan. In particular, the Badgerys Creek Precinct as a whole will always be characterised by lower amenity due to the close proximity of airport operations and aircraft noise, and so is expected to contain highly functional and larger scale developments of a more industrial nature. As such, the Precinct Plan should make more provision for general industrial development typologies.

Given their statutory weight, the Precinct Plans should show, at most, only high level land use and development outcomes and not the fine grain details as currently shown within the Draft Precinct Plan. The detailed provisions and requirements of the Draft Precinct Plan are more appropriate for the Phase 2 Development Control Plan, and should include flexibility to pursue alternative solutions where the employment and investment objectives of the Precinct can be achieved.

It is recommended that the Draft Precinct Plan be revised to remove the level of detail specified in terms of the nature and typology of development, whilst providing for more flexibility for the orderly and timely development of land – especially for general industrial development and enabling industries.

3.4 Schedule of Specific Comments on Objectives and Controls

Section	Comment and Recommendation
Section 1	
1.1	Hanson is generally supportive of the vision, however the Precinct Plan needs to also take into account the land use feasibility and market drivers that will drive the initial phases of investment.
1.3-1.5	The Precinct Plan should be a high-level document that guides more detailed lower order plans, being Master Plans and the Phase 2 DCP. The Draft Precinct Plan is however a highly detailed and prescriptive document, which as a statutory document will prevent the evolution of the Aerotropolis over time, hinder flexibility and make the DA assessment process complex, time consuming and difficult.
Section 2 Precinct Plan Framework	
2.1 -2.3	Hanson accepts and is generally supportive of the eight key planning drivers, however it is noted that the drivers appear too focussed on the end state of the Aerotropolis, and do not envisage the short-term development of enabling industries or the evolution of the Aerotropolis over time. In that regard, adaptability and flexibility to be able to respond to market drivers are critical.
2.4	The Badgerys Creek Precinct has been included with the Aerotropolis Core and Wianamatta-South Creek Precincts, but would benefit from a precinct-specific focus, similar to the approach set out in the Aerotropolis Plan, which identifies that Badgerys Creek should be the precinct for the development of enabling industries as the Aerotropolis evolves due to its lower amenity environment caused by airport operations and aircraft noise.
Section 3 The Precinct Plan	
3	Whilst Hanson is generally supportive of the intent of the Draft Precinct Plan to manage development in an orderly way, the Draft Precinct Plan has too many and too detailed objectives and requirements. Many of the requirements in the Draft Precinct Plan would be more appropriate in the Phase 2 DCP where there would be greater flexibility provided by s3.42 of the EP&A Act which provides that a DCPs principal purposes is to provide guidance and is not a statutory document.
3.2	Hanson queries whether the western part of its site has been allocated as public open space (as the map is difficult to read at the scale published), and on what basis this allocation was made. Whilst Hanson is generally supportive of the provision of public open space throughout the Aerotropolis, the Badgerys Creek corridor runs north-south immediately adjacent to the rear boundary of the site, so allocating part of the site to open space in this location seems unnecessary. Retention of ephemeral creeks and re-use of farm dams is not practical or necessarily desirable in the context of delivering functional industrial development or for enabling industries.
3.3	The Transport Network and Street Hierarchy are far too detailed and prescriptive for a Precinct Plan, and should be limited to the location of collector roads, whilst providing for flexibility in the local road layout taking into account detailed land use planning, and more detailed technical analysis of site conditions and access requirements of specific development typologies.
3.4	The Land Use and Built Form Framework is far too detailed for a Precinct Plan and the high prescriptive requirements do not allow for the evolution of the Aerotropolis over time or the development of enabling industries to support the delivery of the Aerotropolis in the short to medium term. In particular, the yield and density framework, and the urban typologies considered, do not account for key enabling industries. Some further detailed concerns include: <ul style="list-style-type: none"> - Clause 3.4.7 (Evolution or temporal land use and development) makes no provision for the evolution of industrial uses or the facilitation of enabling industries to support the delivery of the Aerotropolis. - Clause 3.4.11 (Sites greater than 5,000sqm) emphasises the delivery of a fine grained urban form that ignores the low amenity environment (due to aircraft operations) and lower density employment outcomes envisaged for the Badgerys Creek precinct. A fine grained urban form may be suitable in some parts of the Aerotropolis, but this current one-size-fits-all-approach lacks flexibility and site-specific context. - Clause 3.4.12 (Amalgamation) – Hanson specifically objects to Requirement LU6 which would prevent any development from occurring until the land has been amalgamated to 5ha. This would prevent the orderly and economic use of the land for the development of enabling industries in the short to medium term, and undermine the flexibility needed to allow the Aerotropolis to evolve over time.
Section 5 Infrastructure Delivery and Staging	
5.3	Out of Sequence Development should also envisage the delivery of enabling industries, and allow flexibility for these industries to evolve over time in response to the changing context and character of the precinct. Requirement I2 should specifically include a trigger for enabling industries.

4.0 Recommendations and Conclusion

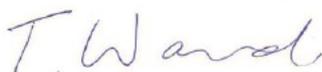
In general, the Precinct Plan should acknowledge that the employment areas within the Badgerys Creek Precinct will always be characterised by lower amenity due to the close proximity of airport operations, and so are expected to contain highly functional and larger scale developments of a more industrial nature. The final form of the Precinct Plan needs to reflect these functionality and feasibility requirements, as well as respecting market drivers. The proposed controls in the Draft Precinct Plan appear to relate more closely to a light industrial / business park scale land use and do not translate into feasible outcomes for the large scale warehousing and/or enabling industrial developments that will lead the first wave of investment in the Aerotropolis.

Our key recommendations are listed below:

Key Recommendations	
1	References to 'light industry' should be removed from the Draft Precinct Plan, and for the Badgerys Creek Precinct the Draft Precinct Plan should provide for more flexibility in the nature and typology of development outcomes – especially making provision for general industrial development and enabling industries.
2	Amenity outcomes within the Badgerys Creek Precinct need to be flexible to be the appropriate scale to suit demand, and should be subject to detailed precinct planning, in order to properly take into account the lower overall amenity environment caused by airport operations and aircraft noise.
3	It is recommended that the Draft Precinct Plan be revised to remove the level of detail specified in terms of the nature and typology of development, whilst providing for more flexibility for the orderly and timely development of land – especially for general industrial development and enabling industries. Higher levels of detail (as currently set out in the Draft Precinct Plan) should be included in a Development Control Plan.
4	The Transport Network and Street Hierarchy in section 3.3 of the Draft Precinct Plan should be limited to the location of collector roads, whilst providing for flexibility in the local road layout taking into account detailed land use planning, and more detailed technical analysis of site conditions and access requirements, allowing the local street network to evolve over time without unnecessarily preventing the development of enabling industries.
5	Clause 3.4.12 (Amalgamation) – should not apply in the event that it would prevent the development of enabling industries.
6	Section 5.3 (Out of Sequence Development) of the Draft Precinct Plan should be amended to specifically provide for the development of enabling industries where such development is at no cost to government.

Hanson would be happy to discuss these issues further in support of DPIE's finalisation of the Draft Precinct Plan in an expeditious manner.

Regards



Tim Ward
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 Ethos Urban