

Andrew Jackson  
Director  
Western Sydney Planning Partnership  
PO Box 257  
**PARRAMATTA NSW 2124**

via NSW Planning Portal

Dear Mr Jackson,

**Re: Draft Western Sydney Aerotropolis Precinct Plan**

I write regarding the Draft Western Sydney Aerotropolis Precinct Plan which was placed on exhibition in November 2020 by the Western Sydney Planning Partnership.

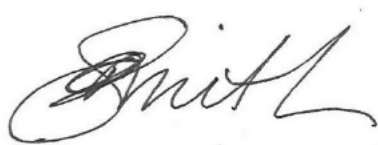
Liverpool City Council welcomes the opportunity to provide a submission on the Draft Precinct Plan. This submission is made pursuant to a resolution of Council at its meeting on 24 February 2021, and consists of the following parts:

- Submission on Draft Western Sydney Aerotropolis Precinct Plan
- Attachment A: Issues raised by the community to Council staff
- Attachment B: Detailed issues and recommendations

Liverpool City Council looks forward to continuing working with the Western Sydney Planning Partnership on the finalisation and implementation of this document.

Should you require any further information on this matter, please do not hesitate to contact me directly.

Yours sincerely,



**David Smith**  
Acting Director City Economy & Growth

## **Draft Aerotropolis Precinct Plan – Liverpool City Council Submission**

### **1. Collaborative approach to developing Precinct Plans**

The Western Sydney Planning Partnership's (the Partnership) collaborative approach to the development of these documents is supported and appreciated. In the early stages of precinct planning, Council staff were involved in a Vision & Principles Workshop, followed by a number of 'Enquiry by Design' workshops which analysed opportunities and constraints, and discussed preferred precinct planning scenarios. Two of these Enquiry by Design sessions were also open to landowners eligible for the master planning process (with sites greater than 100Ha), and to members of the Partnerships Community Liaison Group, which comprises of representatives from each precinct.

Despite early involvement in development of the Plans, the final drafts were not presented to the Partnership's Project Working Group or Project Control Group for endorsement. Previous documents drafted and finalised by the Partnership, including the Western Sydney Aerotropolis Plan, *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020*, and the Aerotropolis Development Control Plan (Phase 1) were all progressed through the Partnerships governance framework prior to exhibition, and then again at post exhibition for review of submissions and finalisation.

Staff recognise that the Partnership were under strict deadlines to undertake public exhibition of draft Precinct Plans prior to the end of 2020, however the established governance process should be used, as this method has been proven to be successful in the past.

#### **Recommendation**

**It is recommended that the Partnership:**

- 1. Use the established governance framework of the Project Working and Control Groups when:**
  - a. responding to this submission and other submissions for this exhibition;**
  - b. endorsing the final Precinct Plans; and**
  - c. developing, endorsing and finalising all future Partnership projects.**

### **2. Implementation of Precinct Plans**

#### **A. Level of detail within draft Precinct Plans**

A Precinct Plan needs to clearly specify what development is appropriate for a site, as well as what infrastructure is required for this development to occur. Currently, the level of detail within the draft Precinct Plan provides general detail suitable to assist in the progression of plans for large and/or master plan sites.

However, the detail is not sufficient for the plans to be interpreted at the individual lot level, as certainty of what is to be developed is not provided. A higher level of detail is required within the draft Precinct Plans, as individual Development Applications and State Significant Developments need to be assessed against a clear and certain framework.

An Indicative Layout Plan (ILP) which condenses all relevant precinct information within a single plan is required for the initial Aerotropolis precincts. The Austral ILP is a recommended example of the level of detail required within an ILP, as this shows the proposed land uses (including centre locations), the road network (specifying Government vs private developer responsibilities), social infrastructure (e.g. open spaces, schools and community centres) and the drainage network.

It is recognised that the vast scale of the Aerotropolis presented challenges in developing draft Precinct Plans with this level of detail within a short period of time. However, additional work needs to be undertaken to ensure the Aerotropolis Precinct Plans can be used to guide and assess development at both the individual lot level and larger scale.

Penrith and Liverpool City Councils have developed their draft 7.12 Contributions Plan. After the finalisation of the Precinct Plans, it is intended that a comprehensive 7.11 Contributions Plan will be prepared, which itemises the required infrastructure to be delivered within an essential works list. Therefore, the Precinct Plans need to be at a level where they clearly specify the detail and location of infrastructure to be funded under this 7.11 Contributions Plan.

## **Recommendation**

**It is recommended that the Partnership:**

- 2. Continue liaising with Council staff to understand the level of detail required in a Precinct Plan, which provides for:**
  - a. the effective assessment of individual sites (not just large or master plan sites); and**
  - b. for the development of an Essential Works List for a 7.11 Contributions Plan**
- 3. Prepare an Indicative Layout Plan, by adding the following information to the Combined Land Use Plan (draft Precinct Plan, p127):**
  - a. Road network (specifying Government & developer responsibility)**
  - b. Open space network**
  - c. Drainage network**
  - d. Social Infrastructure (indicative locations of schools & community facilities)**
  - e. Land-uses and development density**
- 4. Identify what sections of the Indicative Layout Plan are able to be varied (e.g. block depths, deletion of roads)**

## **B. Acquisition & Zoning in SEPP (Western Sydney Aerotropolis) 2020**

The *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020* (SEPP) came into effect on 1<sup>st</sup> October 2020. This included the rezoning of land within the Liverpool Local Government Area from predominantly rural zones, to the broad land use zones of Enterprise, Mixed Use, Agribusiness and Environment & Recreation.

The SEPP used these broad land use zones (not Standard Instrument land use zones) to provide a high degree of flexibility in terms of permissible land uses across the Aerotropolis. It was the intent of Precinct Plans to add the next layer of detail, which would ordinarily have been identified at the zoning stage e.g. location of open space and infrastructure.

It was understood by Council staff that the SEPP would subsequently be amended to ensure its alignment with the Precinct Plan, including the rezoning and mapping of future acquisition, for:

- Additional open space (zone to Environment & Recreation)
- Stormwater basins & drainage infrastructure (zone to SP2 Infrastructure)
- Classified roads (zone to SP2 Infrastructure)

However, no additional rezoning or mapping for acquisition is currently being proposed. This has resulted in confusion in how the plans can be implemented, as there is land zoned Enterprise, Mixed Use or Agribusiness under the SEPP, yet within the draft Precinct Plans it is identified as open space or water basins, and therefore cannot be developed in accordance with the applicable SEPP land use zone.

As rezoning and acquisition is not proposed, it is unclear who is responsible for the delivery of this land, or how acquisition is to occur. This has caused significant distress amongst residents who have been recently rezoned under the SEPP, but cannot develop in accordance with their land use zone, due to the draft Precinct Plan. The release of land for development requires the commitment of land acquisition, as seen in other land releases such as Austral, Leppington and Edmondson Park. It is vital that the Precinct Plans clearly identify government (State and Local) responsibility as well as the developer's responsibility in infrastructure delivery.

## Recommendation

**It is recommended that the Partnership:**

**5. Amend SEPP (Western Sydney Aerotropolis) 2020 to:**

- a. **rezone land for infrastructure (open space, community facilities, stormwater infrastructure and new high order roads);**
- b. **map these areas for acquisition; and**
- c. **identify the relevant acquisition authority.**

## 3. Open Space within draft Precinct Plans

### A. Wianamatta-South Creek Precinct and Environment & Recreation Zone

In Councils submission on the initial planning package (presented to Council 26 February 2020), the following recommendation was provided regarding Environment & Recreation zoned land: *"Recommendation 51 – Provide clarity regarding acquisition plans for Environment and Recreation zoned land, including timeframes and responsible acquisition authority"*.

It is acknowledged that the Department of Planning, Industry and Environment (the Department) are preparing a *Wianamatta-South Creek Delivery Strategy* which will be providing this information, and therefore the delivery (including ownership) of Wianamatta-South Creek is not being addressed within these draft Precinct Plans. Despite this, this Strategy and the Precinct Plans will be inextricably linked, and the Precinct Plan may need to be reviewed in light of the outcomes of the strategy. Given the Partnerships history and knowledge of the issues faced by the community, the Partnership should continue advocating for the review and involvement in the development of this strategy with the Department.

## Recommendation

**It is recommended that the Partnership:**

- 6. Continue advocating to the Department of Planning, Industry & Environment, for the Partnerships involvement in developing the Wianamatta-South Creek Delivery Strategy.**

### B. Location of additional Open Space

Within the finalised Western Sydney Aerotropolis Plan (WSAP), a Strategic Outcome of the Wianamatta-South Creek Precinct is to "Establish the Wianamatta-South Creek corridor as the structuring blue and green infrastructure spine of the Aerotropolis..." It is accepted that further open space (additional to the green spine) is required to be identified within the Precinct Plan, to ensure future employees and visitors are always in walking distance to public open spaces, and to mitigate the effects of the urban heat island. As discussed in 2A (above), this identified open space land is to be rezoned and marked for acquisition to ensure it can be developed.

Whilst additional open space is required, it should be located away from the Wianamatta-South Creek Precinct (including away from the Thompsons Creek regional park area marked for acquisition), and not within the PMF extent/low flood risk area, as the intent of this additional open space is to be supplementary to these areas already identified in the WSAP. To maximise benefits of open space

across within the Aerotropolis, it should be distributed across the precincts, and not situated adjacent to areas already proposed as future open space.

### Recommendation

**It is recommended that the Partnership:**

- 7. Amend the draft Precinct Plans to locate additional open space provisions away from the Wianamatta-South Creek Precinct and Thompsons Creek area, to maximise benefits of this additional open space across the Aerotropolis.**

### C. Extent of Open Space

Although it is recognised that additional open space is required, there is significant concern with the extent of open space that has been identified within the draft Precinct Plans. Through the drafting process, the extent of open space was reduced in response to comments from Council staff, however there is still concern with the extent mapped across the draft Precinct Plan, especially within the Agribusiness Precinct. Without rezoning or acquisition (as discussed in 2A above), there is no pathway for the acquisition, development, and ongoing funding and maintenance of this land.

The scale of the open space entails a risk of becoming a significant barrier to active transit choices across the precincts, particularly in the Aerotropolis Core where someone might need to walk significant distances through the open space in order to reach their destination. The design requires a thorough strategy to ensure activation and experience of these connections and ensure that the distances do not encourage short trip vehicle use. Equally, a minimum distance between pedestrian & cycle links across the parklands would ensure they are more easily crossed.

Whilst there are many open spaces proposed, there are no civic spaces being identified across any precinct. It is important that a considerable amount of civic space is provided for the creation of genuine community benefit and identity within the precincts.

### Recommendation

**It is recommended that the Partnership:**

- 8. Continue liaising with Council to rationalise the extent of open space which can be effectively acquired, developed and maintained.**
- 9. Consider how to overcome the barrier between large expanses of open space and active transport.**
- 10. Consider inclusion of hardscaped civic spaces within open space provision.**

## 4. Aerotropolis Planning Framework

The draft Precinct Plan is currently a 233 page document, with the first two chapters containing background (non-assessable) information, and the assessable sections (Chapters 3-5), contain significant amounts of “*Principles Guidelines*”, which are also non-assessable. Certain ‘Objectives’ and ‘Requirements’ are broad statements, which are also not assessable. The background information is important for understanding context, however the Precinct Plan should clearly delineate between assessable items and background/guidance information.

Once the Aerotropolis Development Control Plan (Phase #2) is released for public exhibition, assistance from the Partnership may be required when assessing Development Applications against the proposed planning framework. This may be in the form of preparing a compliance table, or a template of an assessment report. Alternatively, the Partnership could assist in the development of an ePlanning system, where assessment templates are generated for applicants to pre-fill, which would enable Councils to have consistently formatted applications for their assessment.

## Recommendation

**It is recommended that the Partnership:**

- 11. Improve the legibility of the Precinct Plan documents by differentiating objectives and requirements from non-assessable items.**
- 12. Assist Council in the preparation of an assessment report template, compliance tables, and/or improvements to the ePlanning system to assist in the implementation of the planning framework at the assessment stage.**

## 5. Flexibility of Precinct Plans

### A. Minor amendments to the Precinct Plans

Chapter 1 of the draft Precinct Plan specifies that a planning proposal may be required where the proposed development is not consistent with the Precinct Plan. There should be enough flexibility available within the Precinct Plan to allow for minor changes, e.g. alignment of local street or active transport networks, or changes to the configuration of open space or water basins. A merit assessment can be made at the development application or master planning stage, thereby reducing the resource burden and time constraints of a planning proposal. The Indicative Layout Plan (request above) should show what is set and what is flexible.

Alternatively, these aspects could be placed into the DCP (which will provide flexibility for aspects which are open to variations), whilst more refined land-use and density controls could be realised in the SEPP.

## Recommendation

**It is recommended that the Partnership:**

- 13. Amend the draft Precinct Plan to:**
  - a. Allow variations to the Precinct Plans, justified on a merit assessment; or**
  - b. Refine SEPP and DCP to reduce content of Precinct Plan.**

### B. Transition of temporary & short term uses

The draft Precinct Plan contains Section 3.4.7 'Evolution or temporal land use and development', which primarily encourages the transition of new residential developments into commercial spaces over time. However the draft Precinct Plan does not allow for a departure from the Precinct Plan to provide temporary or short term uses on land, which can later transition to the intended use under the Precinct Plan.

The rezoning of precincts will have increased land-values, and therefore Council rates, resulting in some owners not having the financial capacity to pay increased land-holding costs. In non-initial precincts and precincts without servicing, activities such as agriculture, outdoor recreation, or other low impact/investment uses will be prohibited, restricting the ability of owners to generate income from their land to cover holding costs.

## Recommendation

**It is recommended that the Partnership:**

- 14. Amend Section 3.4.7 'Evolution or temporal land use and development' to allow the development of temporary & short term uses where it can be demonstrated that the Precinct Plan can be achieved in the future, provided a sunset clause is included in any consent.**



## 6. Infrastructure Delivery & Staging

### A. Level of Detail

The proposed and existing infrastructure corridors (e.g. electricity lines, gas or water pipelines) should be mapped within Section 5.1 Infrastructure Delivery of the draft Precinct Plan. The provision of a map will outline opportunities for consolidation and ensure appropriate development occurs along these infrastructure corridors. To complete this mapping, additional engagement with utility companies is required to understand their exact requirements and how it affects the Precinct Plans, for example:

- Any requirements for 800m buffer areas for gas pipelines
- Land requirements from Endeavour Energy/TransGrid (to avoid individual sub-stations on every block corner, and ensure zone substations don't provide for reverse amenity impacts)
- Requirements for the Airport Fuel Pipeline
- Potential undergrounding of existing utilities (e.g. high tension lines) and any applicable easements once they are undergrounded

The development of plans for the entire Aerotropolis precincts provides for a once in a generation opportunity to review all assets and corridors within the Western Parkland City. Much of the utility infrastructure in the area was constructed greater than 50 years ago, when it was assumed that land would only be used for rural and agricultural purposes.

Much of this infrastructure will be built to legacy standards and may not have been constructed to urban standards (such infrastructure may lack safety features which are vital in urban areas, such as concrete encasement of pipelines). Bare corridors, devoid of vegetation or above-ground infrastructure provides reverse amenity and sterilises what would otherwise be prime development land. Council sees it fit that this opportunity be taken to plan for future growth and rationalise existing utility assets in the Aerotropolis precincts to ensure that assets and corridors are fit for their future purposes.

Section 5.2 Sequencing Priorities is supported, however there are no objectives or requirements set in conjunction with Figure 66 Sequencing of the initial precincts. Therefore, it is unclear how the proposed sequencing can be called up at the assessment stage. There needs to be emphasis on the timing/delivery of critical infrastructure, as having access to water and sewerage is more important than a metro station. The Precinct Plan should be updated after infrastructure plans are prepared so it is used as a basis for staging of land for development.

Section 5.3 Out of Sequence Development is also supported, subject to changes. The section should also determine at what threshold the next priority phase starts. This section is also unclear about what developments can progress their application prior to the delivery of infrastructure. For example, development in Austral allows temporary Onsite Stormwater Detention (OSD) basins to be built, prior to the appropriate infrastructure being delivered.

### Recommendation

**It is recommended that the Partnership:**

- 15. Amend Chapter 5, to clarify what is required at the assessment stage for in sequence and out of sequence development.**
- 16. Engage further with utility providers to incorporate their requirements into an Indicative Layout Plan.**

## **B. Prioritisation of Industrial Land**

The sequence of servicing may be ignoring the level of demand we are currently experiencing for industrial and employment lands. Priority is being provided to the Aerotropolis Core Precinct and Northern Gateway Precinct, disregarding the considerable unmet demand we are experiencing currently for industrial land. Council's City Economy staff report that in the vicinity of 40 businesses with investment potential of \$1.5B, bringing up to 7500 jobs are not currently being catered for with timely servicing of industrial land.

### **Recommendation**

**It is recommended that the Partnership:**

- 17. Investigate opportunities to prioritise servicing of industrial land, in accordance with demand.**

## **C. Coordination of Infrastructure Delivery**

Coordinated delivery of infrastructure across the Aerotropolis is imperative to its successful development. The delivery of the Place Infrastructure Compact, State and Local Infrastructure Contributions, as well as the Precinct Plans will require coordination across numerous agencies, including Sydney Water, Transport for NSW, DPIE, Councils, Endeavour Energy, Transgrid etc.

### **Recommendation**

**It is recommended that the Partnership:**

- 18. Liaise with DPIE and Greater Sydney Commission to set up a process for the coordination of infrastructure delivery across the Aerotropolis.**

# **7. Specific Precinct Plan Requirements**

## **A. Height & Floor Space Ratio Requirements**

Within the draft Precinct Plans, Figure 31 Maximum Height Plan and Figure 32 Floor Space Ratio Plan (FSR) specify development standards across the precincts. The proposed heights across the Aerotropolis are generally in accordance with equivalent heights for mixed use and industrial areas across the Liverpool LGA. Likewise, the proposed FSR within the Aerotropolis Core is generally in accordance with that within the Liverpool City Centre. This is to be reviewed in light of comments made regarding the Market Feasibility Analysis Report, as the success of the Core is to not detract from other surrounding centres.

The draft Precinct Plan specifies ranges for height and FSR, and not the exact standards. It can be assumed that applications will only use the upper limit within the range, which will be an unintended consequence of providing range limits for height and FSR. A finer grain level of detail is needed to determine the specific height and FSR which applies to the site. Provision of a minimum FSR may be useful to ensure that the amount of floor area (and job assumptions) is met. This could also be used to ensure sites are planned in an efficient layout, e.g. retail uses don't provide expansive at grade car parking.

### **Recommendation**

**It is recommended that the Partnership:**

- 19. Review extent of development standards in relation to adjoining centres.**
- 20. Amend Figures 31 and 32 to show the specific height and FSR applicable, not a range.**
- 21. Include minimum FSR requirements.**



## B. Section 3.4.12 Amalgamation

Council staff support the inclusion of Section 3.4.12 Amalgamation, subject to certain amendments. The preamble in this section states: “Under the current LEPs the precincts have a current minimum lot size of 10ha or 40ha”. However this is incorrect as the *Liverpool Local Environmental Plan 2008* does not apply to this land, because the SEPP applies.

The Figure 44 legend mentions ‘conceptual amalgamation parcels’, which results in ambiguity regarding how stringent the amalgamation requirement is. The legend also mentions ‘sub precincts’ however their intention is not explained within the objectives or requirements.

As identified in its legend, the Figure aims to provide areas which coordinate the development of open space and major road corridors. However, an amalgamation plan is not the correct avenue to coordinate open space or major roads, as acquisition through the SEPP can achieve this.

The amalgamation pattern does not achieve an equal share of development potential across lots, rather it often isolates areas of Environment & Recreation land away from the Mixed Use/Enterprise areas.

## Recommendation

**It is recommended that the Partnership:**

### **22. Amend Section 3.4.12 Amalgamation to:**

- a. Remove reference to the LEP as it does not apply to this land;**
- b. Clarify intent of ‘conceptual amalgamation’ and ‘sub precincts’; and**
- c. Amend the Figure to focus on amalgamating parcels of land to achieve equitable development potential across lots, or provide a list of parcels to be amalgamated.**

## C. Wildlife Hazard Management

The National Aviation Safeguarding Framework Guideline C notes the obligations of airport operators in reducing wildlife strike risk, as well as provides guidance for land use planning to reduce this risk. Significant work has been undertaken to ensure planning for the Aerotropolis is in line with this Guideline, which is supported by Council. In particular, the measures taken within the SEPP have satisfied the obligations for land use planning within the Guideline.

Council staff have concerns that additional stringent wildlife hazard management measures will have unintended effects upon the Western Parkland City vision if the requirements are not clearly specified. The use of “Government Commitment Areas” within the *Draft Wildlife Management Assessment Report* need to be clearly explained within the Precinct Plan. It should be stated that these areas have no further restrictions (other than those in the SEPP), and that tree removal, and proposed landscaping (species, green roofs, extent of vegetation etc.) is not a matter for consideration within:

- Environment & Recreation Zone
- Mixed Use Zone
- Land with Biodiversity Requirements
- Luddenham Village

Requirement AM6 of Section 3.3.5 Road Network states “Landscape all streets and provide an urban tree canopy in a way which does not inadvertently cause wildlife to become a safety hazard in the operational airspace of the Airport”. The road network should be exempt from stringent wildlife management restrictions as streets play a significant role in urban cooling, amenity for active transit users and sense of place. The current wording of this requirements creates ambiguity and could result in no street trees being provided. The statement should be clarified to ensure that generous, canopied street trees are required, but that certain species are avoided, if appropriate.

Objective LU07 of Section 3.4.2 Land use and built form states “Consider wildlife attraction when determining the appropriate location and type of new land uses...” This does not need to be specified within the Precinct Plan, as requirements for land uses are already specified within the SEPP.

## Recommendation

**It is recommended that the Partnership:**

**23. Clarify implications of wildlife hazard management within the Precinct Plan, including:**

- a. Additional restrictions are not applied to Government Commitment Areas;
- b. The exiting landscape is not to be altered; and
- c. Restrictions do not apply to the road network.

**24. Amend draft Precinct Plans to remove:**

- d. Requirement AM6 of Section 3.3.5 Road network
- e. Objective LU07 of Section 3.4.2 Land use and built form

## D. Affordable Housing

The Greater Sydney Region Plan, *A Metropolis of Three Cities*, specifies that 5-10% affordable housing is generally viable for new residential floor space (p70). Affordable housing has also been considered in the finalised Western Sydney Aerotropolis Plan (WSAP), as Objective 9 is “Diverse, affordable, healthy, resilient and well-located housing”.

The *Market Analysis and Economic Feasibility Study* (Atlas 2020, p17) states “While feasibility testing has established affordable housing is not currently viable in the Aerotropolis, it is understood that Precinct Plans will include a requirement that a minimum of 5% affordable housing is delivered for mixed use development, subject to feasibility testing”. Subsequently, requirement LU6 within Section 3.4.2 Land Use and Built Form states “Provide a minimum of 5% affordable housing in any mixed use development”.

As affordable housing is not seen to be viable for the time being, the future requirement should be in line with the Greater Sydney Commissions 5-10% Affordable Housing target, to deliver the above WSAP objective. Additionally, a SEPP amendment and Affordable Housing Contributions Scheme is required to enable 5-10% affordable housing to be provided.

## Recommendation

**It is recommended that the Partnership:**

**25. Amend the draft Precinct Plan to require 5-10% Affordable Housing to be provided as part of Mixed Use development.**

**26. Amend the SEPP and prepare an Affordable Housing Contributions Scheme to enable affordable housing to be provided.**

## E. Existing Land Uses

The Precinct Plan should consider existing long term land uses and how they will affect the implementation of the plan. For example large land parcels with established uses, such as existing or proposed State Significant Developments, are unlikely to be re-developed in short to medium term. Therefore linkages (e.g. Active Transport) should not be relied upon on these sites as they won't be achieved, unless they are included within a Contributions Plan for acquisition.

## Recommendation

**It is recommended that the Partnership:**

**27. Review the Precinct Plan in relation to location of existing and proposed State Significant Developments to determine if the Plan appropriately responds to their constraints.**

## F. Tourism

Tourism opportunities have not been discussed in the draft Precinct Plan. During 2020, City Economy completed a research report into the feasibility of Holiday Parks and Caravan Parks. This report shows value in a caravan park/camping ground/holiday park within the Aerotropolis Core, but due to financial viability, it is unlikely to be built. A combined Indoor Water Park & Themed Accommodation was also potentially a strategically viable option. Interest is being expressed already by developers in setting up such a facility within the Aerotropolis.

The table below illustrates the various options and constraints under current proposed zones. A major facility under current principles would be prohibited in the Agribusiness precinct. However this may not be viable in any precinct other than Agribusiness, under current proposed zoning plans. Caravan parks and camping grounds also are restricted everywhere.

Land Use Definition	Mixed Use	Enterprise	Agribusiness	Environment
Backpackers accommodation				
Bed and breakfast accommodation				
Farm Stay Accommodation				
Hotel or motel Accommodation				
Serviced Apartment				
Caravan Park				
Camping Ground				
Recreation Facility (major)				

## Recommendation

It is recommended that the Partnership:

28. Include tourism opportunities within the draft Precinct Plans
29. Investigate amendments to the SEPP to rationalise tourism uses across the Aerotropolis.

## 8. Agribusiness Precinct

### A. Interface with Tourism and Industrial Uses

The imagery and language around the Agribusiness Precinct suggest a strong level of tourism and visitor economic activity, however the plans are more aligned with generic industrial uses. The delivery of the human character as identified within the imagery needs finer grain built-form controls with consideration to diversity within the built form. The interface of Luddenham Village and proposed agribusiness uses should allow for the natural expansion of different interacting uses between them with a buffer zone designed to bring the two typologies together.

The Duncans Creek Dam is a significant natural feature which could play an important role in promoting local tourism and connecting agribusiness to tourism uses. There is a risk of creating industrial barriers between people and waterways within the current draft Plans.

## Recommendation

It is recommended that the Partnership:

30. Review the Agribusiness Precinct Plan to ensure built form outcomes responds to the vision.
31. Review the interface of the Agribusiness Precinct with significant landscape features to ensure the success of tourism.

## B. Agribusiness Research Hub

The Agribusiness Vision discussed the development of different agribusiness hubs, but there is little additional detail provided. Councils work in partnership with the Future Food Systems CRC project with UNSW, in mapping and analysing the food production supply chain in the region, will assist to inform development of hubs (along with other proposed aspects of the precinct). However this work will not be available until April 2021 at the earliest.

The need for the Agribusiness Precinct to be precinct planned is premature given the additional level of detail needed regarding feasibility and engagement with business and community regarding these Agribusiness Hubs.

### Recommendation

**It is recommended that the Partnership:**

**32. Provide additional detail regarding planning for the Agribusiness Hubs.**

## 9. Technical Advice: Transport

### A. Implications for Surrounding Growth Centres

The SEPP and draft Precinct Plans identify transport corridors heading east through Kemps Creek and Rossmore, and these lines stop at the eastern edge of the Aerotropolis. The extension of these corridors into the Austral Indicative Layout Plan is required to safeguard these corridors. The connector roads into Austral are currently identified as local roads, and will require increases in their proposed width; this would require the amendment of *SEPP (Sydney Region Growth Centres) 2006*.

### Recommendation

**It is recommended that the Partnership:**

**33. Liaise with the Department and Transport for NSW to amend *SEPP (Sydney Region Growth Centres) 2006* to connect the proposed road corridor into Austral.**

### B. Responsibilities of Transport Corridors

**Detail on classification of roads has not been identified within the draft Precinct Plans, and detail regarding timing of construction has also not been provided. This has resulted in confusion from staff, developers and residents regarding the delivery of the road network.**

### Recommendation

**It is recommended that the Partnership:**

**34. Specify responsibility of road delivery within the Precinct Plans.**

**35. Liaise with TfNSW to determine anticipated construction timeframes.**

### C. Additional Investigations for Implementation

Additional traffic planning is to occur for implementation of the Precinct Plans. This includes:

- A detailed transport management and accessibility plan is to be carried out for each precinct, which includes (but not being limited to):
  - Forecast traffic flows along the proposed street network within each precinct (both AM and PM peaks) in 2026, 2036 and 2056.
  - Forecast travel demands at key intersections to identify intersection treatments, such as traffic signals or roundabout and layouts.
  - Proposed bus network and service plan including rapid bus routes and local bus routes and associated bus stop facilities. The proposed bus routes should avoid dead-end roads with potential transit links to connect other precincts. Consultation is required with TfNSW and bus operators for any interim or ultimate bus routes and associated

bus stops. Each precinct should have at least 90% coverage of bus services (i.e. within 400 m catchment of a bus stop).

- Identification of intersection treatments, traffic calming devices, pedestrian and cyclist crossing facilities and bus stops.
- A Green Travel Plan will be required for major developments within each precinct according to the proposed travel demand management strategy.
- The proposed street networks within the proposed metro station precincts are to be further refined to identify the required transport interchange facilities, such as commuter car park, bus stands, bicycle parking station, taxi and shared vehicle zones, and pick-up and drop-off bays and potential future expansions.
- Intersection treatments are to be designed to cater for heavy vehicle movements. Consideration is given to provide a service road running in parallel to or intersect with the existing and future arterial roads to provide direct access(s) to major industrial premises.
- It is preferred that a 3m wide two-way dedicated cycle track is to be provided along both collector and industrial streets as shown in Figures 7-7 and 7-10 of Western Sydney Aerotropolis Transport Planning and Modelling Stage 2 report.

### Recommendation

**It is recommended that the Partnership:**

- 36. Continue refining the transport plans for the Aerotropolis, with regards to the points above.**

## 10. Technical Advice: Native Vegetation

### A. Implications for Essential Infrastructure Delivery

Careful consideration of the location and impacts of essential infrastructure in relation to biodiversity assets is required to ensure that potential conflicts are identified and appropriately managed early in the planning process. This is considered critical to avoid undue complexities during the delivery phase.

The exhibited draft Growth Centres Biodiversity Consistency Report assumes that only 0.75 ha of Existing Native Vegetation (ENV) will be cleared for essential infrastructure. This area appears to only account for the Major Infrastructure Corridor. Given the apparent uncertainty in the infrastructure planning at this stage, it would seem premature to assume that this would be the only required impact to ENV. It would also seem premature to determine the appropriate extent of changes to biocertified land (as proposed within the Biodiversity Consistency Report) until there are further details available on the required essential infrastructure.

Council has faced significant challenges during infrastructure delivery in previous precincts due to unavoidable impacts to ENV that were not accounted for at the precinct planning stage. This has shifted a significant cost onto Council to provide the required offsets.

### Recommendation

**It is recommended that the Partnership:**

- 37. Consider the potential conflicts between infrastructure delivery and ENV protection throughout the precinct planning process to avoid this complexity in future precincts.**
- 38. Establish a clear process and funding source for any required offset measures.**

### B. Open Space & Native Vegetation Implications

The open space network presented within the Precinct Plan is dominated by linear reserves. The large edge to core ratio of this configuration would make long-term management challenging and is likely to negatively influence the ecological value due to extensive edge effects and encroachments. Where

ENV spans the majority of the width of these linear reserves, infrastructure delivery will be particularly difficult. The design of the open space configuration should respond to potential conflicts such as this to ensure that land management constraints do not present a barrier to infrastructure delivery and reserve utilisation. The configuration should also consider optimal ecological outcomes and required management effort.

## Recommendation

**It is recommended that the Partnership:**

- 39. Consider configuration of linear reserves in relation to biodiversity and infrastructure delivery impacts.**
- 40. Detail the responsibilities and funding arrangements for revegetation and bushland maintenance works to provide Council an indication of likely implications. It is anticipated that this management would extend beyond the biodiversity offset and green infrastructure works included within the SIC, but the extent of the gap isn't clear.**

### C. Technical Report: Biodiversity Assessment (Eco Logical Australia, 26 October 2020)

The Biodiversity Assessment technical report contains some very specific recommendations and assumptions regarding the requirement to adhere to the existing Biodiversity Certification Order. These aren't reflected within the Precinct Plan, which only contains a broad reference to the overall ENV area target set within the Order.

The Biodiversity Assessment technical report assumes that all Existing Native Vegetation (ENV) within areas zoned as Environment and Recreation would be retained. This assumption appears to have been made despite a large degree of uncertainty regarding the likely impacts within these areas. In particular, infrastructure planning is at a very early stage. For example, Figure 12 of the Precinct Plan only shows indicative WSUD drainage basin locations. Consequently, there is little certainty that the assumption that all of this ENV would be retained is reasonable.

If all of the ENV within areas zoned as Environment and Recreation is retained, there is still a shortfall of 45.26ha of ENV required to maintain parity with the Biodiversity Certification Order. Within the Biodiversity Assessment, this is proposed to be primarily covered by an open space network protecting additional ENV. The requirements that are likely to be associated with the management of this ENV will add to the complexity of managing the open space network, and may result in highly constrained reserves with restricted ability to deliver the full range of anticipated uses (particularly active open space). This will cause ongoing management conflicts if not planned for appropriately to ensure that all proposed uses can be catered for. The proposed protection of ENV in the Environment and Recreation zoned land and additional proposed areas of open space would only allow for a surplus of 1.58ha of ENV in relation to the Biodiversity Certification Order requirements. A single essential infrastructure project that is yet to be designed could exceed this surplus.

It therefore seems that the precincts would need to rely upon the additional measure proposed by the Biodiversity Assessment, to include Additional High Conservation Value Vegetation (AHCVV) in the ENV area requirement. Most AHCVV has only been validated via aerial photography (i.e. no site inspection). Of critical importance, it is noted within the Biodiversity Assessment (on page 45) that the EES group of DPIE have indicated that there is no precedence for considering AHCVV. Its suitability and required processes should therefore be further detailed prior to being relied upon as an appropriate measure to meet the ENV area requirement.

Section 4.5 (recovery potential) of the Biodiversity Assessment includes a discussion of the limitations associated with this section. The utilised method offers a very coarse assessment of the recovery potential, and may not be representative of the resources required to facilitate the recovery.



Section 5.4.2 (rehabilitation and revegetation constraints) of the Biodiversity Assessment currently only considers wildlife strike risks and climate change. This section should be expanded to include additional considerations including, but not limited to, infrastructure and recreation related uses which may also influence rehabilitation and revegetation actions.

### Recommendation

**It is recommended that the Partnership:**

- 41. Consider including prescriptive requirements that align with the technical report. Given the apparent importance of retaining all ENV within the open space network, this should also be reiterated in all pertinent sections of the Precinct Plan.**
- 42. Review Section 4.5 and 5.4.2 in light of comments above.**

## 11. Technical Advice: Environmental Health

### A. Technical Report: Draft Air Quality and Odour Study – Baseline assessment for the Western Sydney Aerotropolis – Prepared by NORTHSTAR AIR QUALITY PTY LTD - October 2020

The Draft Air Quality and Odour Study prepared by Northstar Air Quality Pty Ltd identified existing and approved sources of air pollutants and odour in the vicinity of the proposed development site including commercial and industrial activities, agriculture, waste management, extractive industries and infrastructure. Aircraft operations are likely to contribute significantly to concentrations of air pollutants including but not limited to particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOCs) and odour in the region. Increases in ozone were also previously predicted to the south and south-west of the airport. As the assessment of ground-based activities excluded aircraft operations, the Environmental Health Section raised concerns that the consultant's assessment may underestimate potential air quality impacts associated with the airport's operation. If required by the Stage 1 assessment, Northstar Air Quality Pty Ltd reported that a Level 2 and/or Level 3 Odour Assessment would be undertaken in accordance with the NSW Department of Environment and Conservation's Technical Framework: Assessment and management of odour from stationary sources (2006) and its Technical Notes. Council staff believes that a Level 2 or 3 assessment would be appropriate to quantify the extent of air quality impacts associated with the WSA.

Furthermore, the precinct contains existing rural and industrial uses that have the potential to generate odour and other associated impacts which may affect the amenity of land intended for future development and occupation. This is concerning as odour generating land uses may continue to operate for an indefinite period of time. With appropriate consideration, land use conflicts between existing uses and new developments can be minimised or mitigated. As part of their assessment, Northstar Air Quality Pty Ltd referred to Chapter 5 of the Technical Notes to the Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW prepared by the Department of Environment and Conservation NSW dated November 2006 to assess odour impacts from existing broiler poultry farms and calculate acceptable separation distances. It should be noted that Chapter 5 of the Technical Notes is applicable to proposed broiler poultry farms rather than existing operations. This screening method is generally used to assess site suitability and odour mitigation measures for new or modified activities.

In 2012, revised odour modelling was completed for the Austral and Leppington North Growth Centre precinct. JBS Environmental Pty Ltd reported that the entire precinct was potentially affected by unacceptable odours and illustrated the potential odour impact zones (500 metre radius) associated with each poultry farm to assist in identifying land requiring assessment. The 500m buffer distance is considered to be consistent with the majority of published recommended minimum separation

distances of poultry sheds to a range of adjoining land-uses, including urban residential areas. For example, Schedule 3 of the *Environmental Planning and Assessment Regulation 2000* recognises that poultry farms for the commercial production of birds (such as domestic fowls, turkeys, ducks, geese, game birds and emus) within 500 metres of a residential zone or 150 metres of a dwelling not associated with the development are likely to significantly affect the amenity of the neighbourhood by reason of noise, odour, dust, lights, traffic or waste. The 500 metre setback for intensive livestock agriculture to residential zones is also reflected within Part 5 of the Liverpool Development Control Plan 2008. In addition, the Department of Infrastructure, Planning and Natural Resources previously developed a Draft Model Development Control Plan for Broiler Poultry Farms. This document indicates that development proposed within 500 metres of an existing poultry farm must demonstrate that the design, use and ongoing operation of the proposed development will not affect the continued operation of the industry.

## Recommendation

It is recommended that:

- 43. The Draft Air Quality and Odour Study prepared by Northstar Air Quality Pty Ltd is revised to include maps illustrating the buffer distances surrounding the identified sources to ensure that land potentially affected by air quality or odour impacts is readily identified for assessment.**
- 44. The Draft Air Quality and Odour Study is prepared or reviewed and certified by a suitably qualified environmental consultant who is a Certified Air Quality Professional under the CAQP Scheme administered by the Clean Air Society of Australia and New Zealand (CASANZ) or Certified Environmental Practitioner under the CEnvP Scheme administered by the Environment Institute of Australia and New Zealand (EIANZ).**

### B. Technical Report: Draft Western Sydney Aerotropolis Constraints and Land Capability Assessment Stage 1 Report – Prepared by AURECON AUSTRALASIA PTY LTD - October 2020

The assessment fails to provide an executive summary, scope of works, and what the objectives of the investigation were in accordance with the noted NSW EPA Guidelines for reporting on Contaminated Land, 2020. This information would be appropriate to determine the direction of the contamination assessment and identify data gaps present.

The contaminated land assessment completed by Aurecon was reportedly undertaken in general accordance with the National Environment Protection (Assessment of Site Contamination) Measure 1999 as amended 2013, NSW EPA Guidelines for Consultants Reporting on Contaminated Land (2020) and Guidelines made and endorsed by the NSW EPA. As the assessment does not include a detailed appraisal of the site's history, it is believed that the documentation would not sufficiently identify potentially contaminated areas within the WSA that are likely to be constrained for future urban development.

The NSW EPA's document titled 'Consultants Reporting on Contaminated Land Contaminated Land Guidelines' (2020) explains that an appraisal of the site history is fundamental to the preliminary investigation and may be used to assess the likelihood of site contamination. The NSW EPA specifically underlines the importance of reviewing and assessing all relevant information about the site, including information available from planning authorities and the NSW EPA and information obtained during site inspections. Whilst it is understood that the assessment was not prepared to fulfil the requirements of a preliminary investigation of the land, it must provide adequate information to: identify all past and present potentially contaminating activities; identify potential contamination types; discuss the site condition; provide a preliminary assessment of site contamination; and assess the need for further investigations.

As part of their assessment, Aurecon indicated that they reviewed records held by the NSW EPA under Section 60 of the *Contaminated Land Management Act 1997*. However, it appears that the consultant did not review other registers held by the NSW EPA under Section 58 of the *Contaminated Land Management Act 1997* and Section 308 of the *Protection of the Environment Operations Act 1997*. Furthermore, the contaminated land assessment did not appear to include a review of Land Titles records, Council records under Section 10.7 (2 and 5) (formerly Section 149) of the *Environmental Planning and Assessment Act 1979* or SafeWork NSW records for current and historical dangerous goods licences for the WSA. To adequately identify areas of potential concern, the contaminated land assessment prepared by Aurecon shall be revised to address the aforementioned data gaps.

Aurecon confirmed that additional contaminated land investigations would be required in future to delineate the nature and extent of contamination across the WSA. Although not outlined by the consultant, the requirements to consider contamination and remediation in zoning or rezoning proposals were transferred to a Ministerial direction (No 2.6) under section 9.1 of the *Environmental Planning and Assessment Act 1979*. Additional requirements to consider contamination and the need for remediation during development assessment are imposed by Clause 7 of *State Environmental Planning Policy (SEPP) No. 55- Remediation of Land*. Consideration would also need to be given to the requirements of the relevant Development Control Plan.

### Recommendation

**It is recommended that the Partnership:**

- 45. Amend the report in light of comments provided by Council.**

## 12. Technical Advice: Business Development

### A. Technical Study: Western Sydney Aerotropolis Market Analysis and Economic Feasibility Report – ATLAS – October 2020

Within the report, the viability of various precincts are compared based on jobs per hectare and servicing costs, and seem to ignore market demand principles. For example the Aerotropolis Core is predicted to provide more jobs per hectare and residential areas per servicing dollar. This is to be expected, however there is limited private sector market demand for those investment classes in the area, and other areas of Liverpool LGA are already serviced and appropriately zoned for such developments, for example Liverpool CBD.

The technical study is focussed on the Aerotropolis Core, ignoring current demand and the Liverpool CBD. The three major cities that comprise the region (Liverpool, Campbelltown, Penrith) are drivers of the Aerotropolis and are already well resourced and serviced. The success of the Aerotropolis Core should not detract from the surrounding centres.

### Recommendation

**It is recommended that the Partnership:**

- 46. Review the report and draft Precinct Plan development standards (height & FSR) in light of the comments provided. Consider amending the precinct priority strategy based on market sensitivity testing and the capacity of commercial floorspace in the metropolitan cluster for development that does not benefit from airside proximity.**

## 13. Technical Advice: Community Planning

### A. Technical Study: Draft Social Infrastructure Needs Assessment

#### Section 5.2.3 - Health Infrastructure and facilities

The planning and design considerations for health infrastructure and facilities should consider adaptable spaces (flexible room areas) to accommodate emergency response like bush-fire relief area, and temporary accommodation space.

#### Section 5.7.2 - Commitments and recommendations for cultural and art facilities

This should include consideration of cultural facilities celebrating the history of the place being agricultural land.

#### Section 5.9 - Parks and Open Space

Local Sports field: Liverpool City Council promotes and supports provision of a minimum 2 sports fields to facilitate multi-use of the fields. For local sports field provision, Council prefers 2 rectangle sports fields co-located with an oval field. For sites that don't allow for 2 rectangle fields, Council recommends dual purpose single sports field.

District Sports field: Council supports the following combinations (not limited to):

- 2 x rectangle sports field and 1 x oval;
- 2 sets of 2 x rectangle field with 1 x oval;
- 2 x rectangle sports field and 1 x oval; and 2 x outdoor sports fields (multi-purpose); and
- District sports fields + local outdoor sports/ district outdoor sports.

Local Outdoor Sports field: Recommended provision of minimum 2 outdoor sports fields to facilitate multi-use of the fields. For sites that don't allow for 2 outdoor fields, Council recommends dual purpose single sports field.

### Recommendation

**It is recommended that the Partnership:**

- 47. Review the report and draft Precinct Plans in relation to the comments provided.**

## **ATTACHMENT A – Issues Raised by the Community to Council Staff**

This section reflects the prominent issues raised by the community to Council staff through phone calls, landowner education workshops run by Liverpool City Council, and workshops run by the Western Sydney Planning Partnership:

### **1. Acquisition**

As discussed within the submission, residents have reasonably requested any land identified for open space or water basins be marked for acquisition. Significant stress has been experienced by the community where they have been zoned for Enterprise or Agribusiness and then shown as open space or basin within the draft Precinct Plan. Clarification on how this land is to be developed has not been provided.

There is much community confusion over the acquisition strategy for public open space and other community land as designated. Many small businesses have expressed disappointment at this exclusion and this has caused uncertainty in the decision making process which, in turn, risks limiting investment and job creation in the area.

### **2. Environment & Recreation Zoning**

The *SEPP (Western Sydney Aerotropolis) 2020* came into effect on 1<sup>st</sup> October 2020, and this introduced the Environment & Recreation zoning. There is still significant concern amongst the community regarding the implications of the Environment and Recreation zone within the Wianamatta-South Creek Precinct. This submission requests the Partnership liaise with the Department of Planning, Industry and Environment on the development of the Wianamatta-South Creek Delivery Strategy.

### **3. Clarity of Plans**

The draft Precinct Plans were only released in A4 size and not clear as to where individual lots applied. It is requested that release of future plans ensures they are legible to how they affect individual sites.

### **4. Dwyer Road Precinct**

Many businesses that are currently located in the Dwyer Road Precinct desire more certainty in order to expand. As well, if this area were already rezoned, it has the capacity to be serviced in a timely fashion and could potentially attract new business that would not be attracted to other areas in the Aerotropolis. Many small businesses in this precinct face considerable pressure from surrounding development and many would like to expand or continue to operate but the current zoning precludes them from doing so. The precinct may provide a suitable site for tourism style development.

### **5. Level of Engagement**

The community expressed disappointment and frustration with the level of engagement from this public exhibition. Previous engagement with the community has been positive, with one on one meetings provided, yet many residents expressed concerns that the plans were unclear and there was no forum to discuss. More intensive and better quality engagement with stakeholders would lead to greater success in managing these issues. Planning is best done to suit market conditions and community expectations can then be managed, rather than be a government led “top down” approach.

**ATTACHMENT B – Detailed draft Precinct Plan Issues & Recommendations**

Section	Item	Issue	Recommendation
<b>Chapter 3 Precinct Plan</b>			
Chapter 3	All	Inconsistency between wording of 'open space' and 'public open space'.	Change 'open space' to 'public open space'.
<b>3.1 Recognise Country</b>			
3.1.1 Aboriginal Heritage	All	This seems to be restricted to the protection of parklands.	It is recommended that clear actions for connection to country be identified within the built form setting of each precinct plan.
<b>3.2 Blue-Green Infrastructure</b>			
Principles Guidelines	All	This information is not in an assessable location. Most is just background information, some would make good objectives, requirements or DCP controls. Example: "12: Consolidate areas of deep soil to ensure pervious soils, with...50%..." Should be a DCP control "13: Optimise dams for their ability to cool the place and aim to re-use, adapt or enhance them for water retention." Can be a Farm Dam Objective.	Move assessable controls to an assessable location. Clearly delineate between guidance/background information and assessable requirements to assist in assessment process.
3.2 Blue Green Infrs. Framework	Figure 11	Definition of Medium Flood Risk states "Low impact recreation - Boardwalk walking trails and viewing". The word 'platform' is missing.	It shall be "Low impact recreation - Boardwalk walking trails and viewing platform".
3.2.1 Wianamatta-South Creek Corridor	BG1	"Provide drainage basins in the general location shown on Figure 12 to appropriately manage water". The terms 'general location' of basins and 'appropriately manage water' is not sufficient enough for precinct planning.	Liaise with Sydney Water to determine exact requirements for basins, so they can be acquired. This will require concept designs to determine inlet/outlet channels, volume, and water quality improvement area.
3.2.2 Flood Management	BG1	"Ensure urban development avoids encroachment into the 1% AEP." This is contrary to SEPP (Western Sydney Aerotropolis) 2020, which allows development within Environment & Recreation zoned land.	Provide controls which allow for development that is appropriate within 1% AEP.
3.2.3 Water in the Landscape	All	This section includes water quality performance criteria (ambient qualities of waterways and waterbodies).	It is also recommended to include pollutant reduction targets for urban development as per Council's requirement.
3.2.4 Riparian corridors & farm dams	BG3 BG8	Waterway health targets set in previous section are being repeated in this section. Only need to be established once.	Delete requirements.



Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan

Section	Item	Issue	Recommendation
3.2.5 Integrated Water Management & WSUD	BGO3	This objective is to comply with the DCP. This is not needed to be mentioned, as it applies for every section of the Precinct Plan.	Delete requirement.
3.2.5 Integrated Water Management & WSUD	BG1	Waterway health targets set in Section 3.2.3 are being repeated in this section. Only need to be established once.	Delete requirement.
3.2.5 Integrated Water Management & WSUD	BG6	<i>"Provide an allocation of enough, suitably located land area to allow for stormwater assets"</i> . This is not clear enough for planning to occur. The stormwater system needs to be specified and acquired.	Provide detail of stormwater system.
3.2.5 Integrated Water Management & WSUD	Figure 13	Figure illustrates stormwater management system for the land falling towards the street only.	Include an illustration demonstrating how the stormwater for the area will be treated if development site is falling away from street i.e. when requiring inter allotment drains.
3.2.6 Undisturbed Soil Network	BG4 BG5	These requirements relate to canopy cover not the soil network.	Move requirements to Section 3.2.7 Public domain and canopy cover
3.2.7 Public Domain & Canopy cover	BGO5	<i>"Plant trees close to buildings and hot surfaces to ensure effective building cooling."</i> This is not an objective. It is a control suitable for a DCP.	Delete from Precinct Plan, and put into DCP. Trees should not be planted within 3m of building foundations
3.2.7 Public Domain & Canopy cover	BG1	<i>"Consider the open space demands of the worker population along with existing and future (where appropriate) residential demand."</i> Is not a measurable requirement.	Delete, as the open space map (and future acquisition map) has considered this need.
3.2.7 Public Domain & Canopy cover	BG8	No deep soil requirements have been provided.	Add in deep soil requirements from the Principles Guidance at start of Chapter.
3.2.7 Public Domain & Canopy cover	BG11	This is a WSUD control, does not belong in this section.	Remove and place within Section 3.2.5 Integrated Water Management & WSUD.
3.2.8 Biodiversity & vegetation corridors	Figure 16	Figure 16 is a map of High Ecological Value (HEV) areas. However, there is no reference to this feature within the text of the Precinct Plan.	Clarify how the Precinct Plan responds to HEV and why it has been included as a figure.
3.2.8 Biodiversity & vegetation corridors	All	This section refers to the Cumberland Plain Conservation Plan (CPCP), which is in draft form.	The CPCP should be finalised prior to being relied upon by the Precinct Plan to ensure a robust information base and clarity regarding potential implications.
3.2.8 Biodiversity & vegetation corridors	BGO3 BGO8	Both relate to Cumberland Plain Conservation Plan. Don't need duplication.	Merge or remove one objective.
3.2.8 Biodiversity & vegetation corridors	BGO5	<i>"Support long-term viability and ecological connectivity by ensuring development does not encroach on protected land."</i> Protected land is not defined.	Define the intended scope of 'protected land'.

Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan

Section	Item	Issue	Recommendation
3.2.8 Biodiversity & vegetation corridors	BG1 BG2	These are duplications of the same information.	Merge or remove one requirement.
3.2.8 Biodiversity & vegetation corridors	BG2	"...include generous linear parks..." It is unclear what is intended by the term 'generous'. Eg is there a minimum width proposed for the linear parks, and many of the riparian linear parks currently shown in the draft Precinct Plan would not be considered generous in an ecological context.	Clarify intent of wording.
3.2.8 Biodiversity & vegetation corridors	BG2	"...include corridors to allow wildlife to migrate". Migrate is incorrect language.	Change 'to migrate' to 'movements'.
3.2.8 Biodiversity & vegetation corridors	BG3	Clarify whether 'movement corridors' is intended to be a reference to animal movement or human movement.	Clarify wording.
3.2.8 Biodiversity & vegetation corridors	BG4	Clarify the intent of this requirement by including further details on the referenced Caring for Country principles.	Request clarification on how Connection to Country principles can be assessed.
3.2.8 Biodiversity & vegetation corridors	BG5	Relates to soil landscapes, already covered in Section 3.2.6 Undisturbed Soil Network.	Delete requirement.
3.2.8 Biodiversity & vegetation corridors	BG6	<i>"Provide an efficient water source for trees including compact shared utility trenches below footpaths to maximise the area of unobstructed deep soil."</i> This does not relate to this section.	Delete or move to Section 3.2.7 Public Domain & Canopy cover
3.2.8 Biodiversity & vegetation corridors	BG7	What is intended by 'conservation areas', and does this differ to 'protected land' referenced in BG05? What are the 'targeted' threatened species?	Ensure clarity and consistency of terms.
3.2.8 Biodiversity & vegetation corridors	BG10	Where should the replacement trees be planted, are they required to be within the development site? This may not always be considered feasible.	Clarify intent of requirement.
3.2.8 Biodiversity & vegetation corridors	Figure 17	This Section does not explain its correlation with Figure 17.	Explain intent of each legend marking in Figure 17 within the written objectives and requirements.
3.2.9 Scenic and Cultural connection	All	This is an appropriate level of Objectives and Requirements.	Implement this level of detail across other sections.
<b>3.3 Access &amp; Movement Framework</b>			
Principle Guidelines	All	This information is not in an assessable location. Most is just background information, some would make good objectives, requirements or DCP controls.	Clearly delineate between guidance/background information and assessable requirements to assist in assessment process.

Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan

Section	Item	Issue	Recommendation
3.3.2 Active Transport	Figure 20	It is unclear how active transit connections, particularly the cycling routes will interact with the undulating nature of the landscape, which risks low active transit use.	It is recommended that adequate resting sites and raised pathways/bridges are identified in the early stages to accommodate this challenge. Requirements are to be clear that cyclists have priority over the needs of other road users when designing such corridors. These routes are not to be located in the same corridors as high vehicular traffic corridors. A land-acquisition plan may be required to ensure missing links do not ensue.
3.3.4 Freight	Figure	Figure is missing. Section does not contain a map showing freight routes.	Provide a corresponding map to accompany this section.
3.3.6 Travel Demand Management	All	This is adding to Section 3.3.1 Transport Strategy. It does not need to be its on standalone section.	Merge with Section 3.3.1 Transport Strategy to simplify the Chapter.
3.3.7 Protect Transport Corridors	AMO2	<i>“Achieve long-term protection for corridors, subject to the Major Corridors SEPP, by ensuring that development does not adversely impact or prevent the land from being used as an infrastructure corridor in the future.”</i> Do not need a precinct plan to ensure a SEPP is enforced. The Corridors SEPP does not cover all corridors, so this section should be about protecting the corridors that don’t have any protections.	Remove reference to Corridors SEPP.
3.3.7 Protect Transport Corridors	AMO3 AM4	This relates to protection of classified roads, however classification of roads have not been showed.	Mark road classification within Precinct Plan.
3.3.7 Protect Transport Corridors	AM3	The requirement for development within 25m of rail & road corridor is already established through <i>SEPP (WSA) 2020</i> Clause 29, and is not needed in Precinct Plan.	Delete requirement.
3.3.7 Protect Transport Corridors	AMO4	This is an objective relating to freight and not corridor protection.	Move to Section 3.3.4 Freight.
3.3.8 Street hierarchy and typology	Intro	Mentions this section applies to all roads, including classified roads, however classification of roads have not been showed. Clarify the explanatory text – where each cross section is applied?	Mark road classification within Precinct Plan.
3.3.8 Street hierarchy and typology	Intro	Paragraphs 2 and 3 are unclear. High order roads are ‘fixed’ but require more detail. Lower Order roads are ‘not shown’. What do these sentences mean?	Clarify wording of paragraphs 2 and 3.

*Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan*

Section	Item	Issue	Recommendation
3.3.8 Street hierarchy and typology	Table 1	The Higher Order Roads names within the Table (priority public corridor, primary arterial, motor ways, freight) don't match with the lines within Figure 22. Don't know where the information in the Table is to apply, if it does not match with the road network.	Clarify how Table 1 is to apply to the Road Network.
3.3.8 Street hierarchy and typology	Street Sections	The street sections presume static land uses, and in the case of sub-arterial roads (45m and 40m wide), restrict interaction with built form through continuous planting zones between footpaths and lot boundaries as well as being designed as movement only space.	Include flexible zones at regular intervals which can accommodate other uses e.g. bike parking, seating, business/shopfront activation, etc. especially along the active zones.
3.3.8 Street hierarchy and typology	High Street	The "High Street" is designed with car dominance which undermines the essence of the "high street" character. The continuous planting separating pedestrians from the carriageway limits the ability for easy crossing, discourages cyclists from stop/start trips and encourages faster driving. Given a high street character which presumes active uses on each side of the street, the design of the elements within the street reduces the likelihood of achieving the high street outcome.	It is recommended that intermittent gaps in planting is provided for easy crossing/cyclist stopping with a reduced speed limit to achieve the high street character.
3.3.8 Street hierarchy and typology	Street Sections	Cycling seems to be planned for a purely commuter experience e.g. on most streets the amount of continuous planting zone between cycle lanes and footpath prevent stop and start cycling trips. There is an opportunity to encourage new and social cycling interactions by providing adequate breaks/flexible areas along the cycleway.	It is recommended that cycling infrastructure is designed with good interaction to pedestrian zones especially in more active areas.
3.3.8 Street hierarchy and typology	Street Sections	The design of the street intersections are not detailed out within the drawings, and it is unclear how different transit modes are prioritised at intersections.	It is recommended that intersection typologies are designed at the early stages and are included as part of the street typologies. Provide details on Local Area Traffic Movement or traffic calming infrastructure. Provide information on visual cues and the design of the street network to enforce the road hierarchy and prevent every local street from facilitating through traffic. Provide guidance on how to improve intersection safety at uncontrolled 4-way intersections without reducing pedestrian permeability.
<b>3.4 Land Use and Built Form Framework</b>			
Principles Guidelines	All	This information is not in an assessable location. Most is just background information, some would make good objectives, requirements or DCP controls.	Clearly delineate between guidance/background information and



Section	Item	Issue	Recommendation
			assessable requirements to assist in assessment process.
3.4.1 Hierarchy of Centres	All	Local/neighbourhood centres need to incorporate development controls on lot sizes, to achieve a fine grain architectural outcome for the neighbourhood centre. This would ensure an accessible environment for small business and accommodate appropriate uses. The precinct plans should also have development controls for the connections between the centres to encourage walkability.	Provide additional development controls for centres.
3.4.1 Hierarchy of Centres	All	The distance between neighbourhood centres is quite large, and smaller scale centres need consideration. It is recommended that smaller sized local centres are included within the mapping of centres to encourage walkability, local character and access for small business.	Provide additional development controls for centres.
3.4.1 Hierarchy of Centres	All	The section shows indicative areas for centres and identifies their hierarchy. The location and floor space area of each centre needs to be identified to ensure its future development. If not identified, floor space may not be provided if it is not as viable option or excessive floorspace may undermine higher order centres.	Prepare an implementation list/framework detailing how detailed planning for centres is to occur, and how it will be delivered.
3.4.1 Hierarchy of Centres	Figure 29	Explanation of specialised Centre – spelling error on line 6.	Correct error.
3.4.1 Hierarchy of Centres	Table 2	Local Centres & Neighbourhood hubs: “ <i>Ideally located on a frequent public transport spine</i> ”. This isn’t an ‘ideally’ criteria, it is essential.	Remove word ‘ideally’ in Local Centres & Neighbourhood hubs.
3.4.2 Land Use and Built Form	All	This section should be about Land Use only, as this is section relates to Figure 30 Combined Land Use Plan.	Remove height and density objectives and requirements, and place within relevant Height and FSR Sections.
3.4.2 Land Use and Built Form	Obj.	Reduce the objectives in this section, as there are too many to be practical. For example: LU03 isn’t an objective and can be placed in the DCP LU04 relates to height & density and can move to relevant Sections for height/FSR LU05 is an OLS requirement already established in the SEPP, so isn’t needed in the Precinct Plan LU07 is land use considerations for wildlife strike, which is already in the SEPP, so isn’t needed in the Precinct Plan LU08 relates to retention of stormwater and does not link to land uses	Relocate or delete objectives.

Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan

Section	Item	Issue	Recommendation
3.4.2 Land Use and Built Form	LU5	"Apply Enterprise and Light Industry Zone...". Zoning is already established within the SEPP (light industry is not a land use zone). The Precinct Plan does not change the zoning.	Delete this requirement, as the Precinct Plan does not zone land.
3.4.2 Land Use and Built Form	LU6	A minimum of 5% is not in line with the Greater Sydney Region Plan of 5-10%.	Amend to show 10% minimum. Then prepare an Affordable Housing Contributions Plan.
3.4.2 Land Use and Built Form	LU7	"Achieve the locational criteria of particular social and public domain uses..." What does locational criteria mean?	Clarify what locational criteria means.
3.4.2 Land Use and Built Form	LU10	Cross ventilation & thermal comfort are DCP issues.	Reframe to a Precinct Plan level requirement by considering street orientation and prevailing winds at the ILP/block level, to avoid instances where developers just want to maximise yield.
3.4.2 Land Use and Built Form	LU14	"Develop land adjacent to Wianamatta-South Creek and Thompsons Creek as a regional park." The regional park is within the Thompsons Creek area, not adjacent.	Reword to remove 'adjacent'.
3.4.3 Height	LU1	The OLS already applies under the SEPP, and does not need to be established in the Precinct Plan again.	Remove Requirement.
3.4.3 Height	Figure 31	Presents a height range, and not exact numbers. Only the maximum will be used, meaning the intent of having a range will not be realised.	Provide exact height figures not a range. A minimum height (or floor space) requirement may be desired to ensure that job density targets are more likely to be realised.
3.4.4. FSR in Mixed Use	LUO1	This objective says to apply FSR. This is not necessary.	Delete objective.
3.4.4. FSR in Mixed Use	LU1	References FSR within DCP. There are no controls within the Phase 1 or Phase 2 DCP for FSR.	Delete reference to DCP.
3.4.4. FSR in Mixed Use	LU2	This requirement relates to yield, not FSR.	Relocate to Section 3.4.5 Yield and Density
3.4.5 Yield & Density	LU3 LU4 LU5	This is essentially repeating the same idea.  LU5 also refers to the 'Market Analysis and Economic Feasibility Report'. Any information for assessment should be in Precinct Plan, the report should be background info only.	Merge into one Requirement, stating meet the targets, or justify undersupply or oversupply.  Remove reference to the report.
3.4.6 Urban typologies	Info	Is a development meant to choose which typology is most fitting for them?	Clarify how this will be implemented.
3.4.6 Urban typologies	Figures	The images currently don't show any detail and it is very unclear on how this idea is meant to work.	Clarify images to show how they are to work.



*Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan*

Section	Item	Issue	Recommendation
3.4.6 Urban typologies	Table 5	High levels of pervious area makes it difficult for small sites to be developed. It is less likely that these requirements can be achieved in medium density residential areas due to lot sizes.	Specify minimum lot sizes for development or specify pervious area to allow development to occur on smaller sites.
3.4.7 Evolution or temporal land use and development	LU2	Mentions Key site Map in SEPP. The SEPP already achieves this requirement, and it doesn't need to be repeated.	Delete requirement.
3.4.9 Open Space Typology	All	For this to be enabled, acquisition is required.	Show acquisition on maps.
3.4.9 Open Space Typology	Info	Active recreation i.e sport fields should be multi-purpose and multi-use to provide for diversity in recreation facilities. Co-location of facilities should be considered wherever possible.  A minimum two sporting fields (applies to cricket, rugby and soccer) are recommended for operational and performance feasibility. In case of tennis and basketball courts a combination of 4 courts is highly recommended (operational and performance feasibility) with multi-use line marking to support a wide range of sports.  Recreation facilities should be accessible to all age groups and abilities (aligned with Everyone Can Play Guidelines and Council's DIAP Action Plan).	Amend section to include information.
3.4.9 Open Space Typology	Info	The linear park and nature zones will need to identify locations for amenities (public toilets and change rooms) to establish a high-quality open space network with pedestrian connectivity and accessibility.	Amend linear park wording to include amenities.
3.4.10 Interface and management with existing uses	All	This information is covered within the EP&A Act or DCP controls. Not needed in the Precinct Plan.	Delete Section.
3.4.12 Amalgamation	Info	The info mentions existing LEPs, however the LEPs aren't applicable to the land.  The "future Phase 2 DCP.... includes provisions to encourage amalgamation of lands". The DCP will be active at the same time, so is not 'future', and there are no provisions to encourage amalgamation of land.	Delete reference to LEPs.  Delete reference to Aerotropolis DCP.
3.4.12 Amalgamation	Figure 44	Amalgamation Plan doesn't meet the wording, it results in parcels of land which have higher development potential, and other lots burdened by E&R land which isn't being acquired.	Refer to Amalgamation discussion within this submission.

Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan

Section	Item	Issue	Recommendation
		Legend mentions items which are not discussed in the writing: "Open space requiring coordinated development" "Major roads requiring coordinated development" "Sub precincts"	
3.4.13 Roofscapes	All	This is not relevant for a Precinct Plan.	Relocate to the DCP.
<b>3.5 Social and Cultural Infrastructure Framework</b>			
Principles Guideline	All	This information is not in an assessable location. Most is just background information, some would make good objectives, requirements or DCP controls.	Clearly delineate between guidance/background information and assessable requirements to assist in assessment process.
3.5.1 Social, comm. & cultural infrastructure	Figure 48	This Figure identified dot points, but not land allocation for different types of social infrastructure. The land needs to be set aside, or have timeframes on when decisions are made for location/acquisition.	Further investigation into location or requirements of social infrastructure.
3.5.1 Social, comm. & cultural infrastructure	SC4	This requirement is to assess the need for social infrastructure. The social infrastructure study has already done this.	Delete requirement.
3.5.1 Social, comm. & cultural infrastructure	SC6	<i>"Provide active recreational facilities and sport fields in locations and quantity outlined in the Special Infrastructure Contribution and Local Contribution Plans."</i> The SIC or LIC don't show locations.	Delete requirement.
3.5.1 Social, comm. & cultural infrastructure	SC7	Design of building is not a Precinct Plan matter. This is covered by the DCP.	Delete requirement.
3.5.1 Social, comm. & cultural infrastructure	SC8	Design of building is not a Precinct Plan matter. This is covered by the DCP.	Delete requirement.
3.5.1 Social, comm. & cultural infrastructure	SC9	This requires provision to be in accordance with Table 7. This was already established in SC5.	Delete duplication.
3.5.1 Social, comm. & cultural infrastructure	SC10	Incorporation of green infrastructure is a design matter, dealt with in DCP.	Delete requirement.
3.5.1 Social, comm. & cultural infrastructure	Table 7	There is a drafting error in the description.	Correct error.
3.5.1 Social, comm. & cultural infrastructure	Table 7	The following are prohibited in the Agribusiness zone in SEPP, yet identified as social infrastructure needs in Agribusiness Precinct: Aged Care Recreation facilities (outdoor)	Amend SEPP or Precinct Plan to ensure consistency in land uses.

*Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan*

Section	Item	Issue	Recommendation
3.5.1 Social, comm. & cultural infrastructure	Table 7	The number of sports field proposed are required to be reviewed/reconfigured over the course of development, in response to the evolving recreation need and demand of the precincts. 10 Netball courts serve a certain demographic population, but not wider demographic requirement. 10 netball courts are likely to be delivered in a combination and shared use with complementing sports like basketball and tennis.	Add commentary provision is to be reviewed in accordance with demand/changing demographics.
3.5.1 Social, comm. & cultural infrastructure	Table 7	The aquatic facility is not identified under Western Sydney City Deal and PIC. Will it be considered as a part of SIC? The proposed aquatic centre should be classified as Regional considering the catchment area of Aerotropolis (Aerotropolis Core and other precincts). A regional aquatic centre should be identified under SIC.	Revise in relation to PIC and SIC.
<b>3.6 Sustainability &amp; Resilience Framework</b>			
Principles Guideline	Info	There are terms in Paragraph 1 which are not clear and not included in the Glossary. For example: 'respond to the ecosystem', what is 'ecosystem' referring to? 'sustainability is regenerative' 'cyclical resources'	Clarify wording.
Principles Guideline	Info	In Paragraph 2 it is stated that the Aerotropolis will follow best industry practice for the first three to five years. What industry standards are applied after five years? In the future, when the industry standards advance beyond the referenced targets will the Aerotropolis targets be revised accordingly? There is reference to a 'target of regenerative sustainability', but the target and terminology are not clear.	Clarify wording.
Principles Guideline	Info	Remove reference to Phase 2 DCP. This will be active at the same time.	Remove reference to Phase 2 DCP.
Principles Guideline	All	This information is not in an assessable location. Most is just background information, some would make good objectives, requirements or DCP controls.	Clearly delineate between guidance/background information and assessable requirements to assist in assessment process.
Principles Guideline	1	There is a heavy reliance on achieving tree canopy targets through streetscape works.	Include other options for increasing tree canopy (e.g. green infrastructure, road, lot and green space layouts, private domain)
Principles Guideline	4	Consideration should be given to decentralised energy supply storage solutions (e.g. community solar power), and/or tri-generation schemes	Include decentralised energy supply storage solutions.
3.6 Sustainability & Resilience Framework	Obj.	There are too many objectives to be effective.	Consolidate objectives, or place into DCP.

*Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan*

Section	Item	Issue	Recommendation
3.6 Sustainability & Resilience Framework	Obj.	Consider objectives below: High performance, energy saving and green building facades to reduce heat and light reflection. Promote solar panels installation for industrial and residential use. Installation of solar lights in parks and open space	Consider these objectives.
3.6 Sustainability & Resilience Framework	SRO3	"Set water and energy targets that exceed BASIX." This reads like an objective for the Precinct Plan delivery, not what an applicant can achieve.	Delete objective. Provide evidence to support more stringent targets.
3.6 Sustainability & Resilience Framework	Req.	There are too many general requirements. Keep only the measurable requirements within the Precinct Plan, and move the remaining to the DCP (adding additional detail). For example: Assessable: SR7 (targets) SR8 (source materials from within 30km) Not assessable/Precinct Plan relevant: SR5 (develop integrated systems) SR6 (air flow/ventilation)	Delete requirements if detail (e.g. energy generation) is detailed within the DCP.
3.6 Sustainability & Resilience Framework	All	There is little detail on the type of recycled water to be potentially delivered, and to where. Competitive pricing of that water will also be crucial to ensure viability of any future intensive horticulture proposed in the precinct. This is especially so in the Agribusiness precinct, which presumably is the area most likely to benefit from a recycled water scheme.	Request additional detail regarding recycled water is provided.
3.6 Sustainability & Resilience Framework	All	Very little detail is provided also as to the circular economy hubs within the precincts. ie where should they go? What size? Or is it better to be more flexible and leave the market to decide? For example, a solar farm of around 5MW is proposed on CSR's land at Badgerys Creek. Is this an appropriate site for this facility? Should it be larger to cater for future demand? Where are the best sites for facilities of this type?	Clarify circular economy hubs.
<b>Chapter 4 Specific Precinct Plan Performance Criteria</b>			
4.1 Aero Core, Badgerys Creek & Wianamatta	All	This level of detail is appropriate for the DCP not a Precinct Plan.	Move to DCP.
4.1 Aero Core, Badgerys Creek & Wianamatta	Images	The imagery and artist impressions of the Aerotropolis Core need to be more accurate to indicate the appropriate heights for the buildings. The character of the graphics suggests a more residential outcome than what is planned for the area.	It is recommended that the imagery should indicate more accurate built form outcome and likely users/uses.
4.3.1 Luddenham Village	All	Support vision for Luddenham Village.	N/A.

*Submission to Western Sydney Planning Partnership Draft Aerotropolis Precinct Plan*

Section	Item	Issue	Recommendation
4.3.4 Heritage (Agribusiness)	All	This duplicates with the Section 3.1 of the Precinct Plan.	Remove duplication with heritage section of the Precinct Plan.
<b>Chapter 5 Infrastructure delivery &amp; staging</b>			
Chapter 5	All	Various.	Refer to discussion regarding staging within this submission.
<b>Miscellaneous</b>			
Additional consideration		Identify the level of activation throughout the day for each area. This is particularly the case where hotels and fly in, fly out uses are located.	Levels of activity across the large open spaces and industrial sites are clearly identified and Crime Prevention Through Environmental Design strategy is captured with the precinct plans.
Reference Documents		Provide links to reference documents within the Precinct Plan & DCP for future references (legislation, guidance documents...).	Provide links where documents are referenced.