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Attention: NSW Department of Planning, Industry and Environment
4 Parramatta Square,
12 Darcy Street
Parramatta, NSW, 2150

12 MAR 2021

DEPARTMENT OF
PLANNING, INDUSTRY
AND ENVIRONMENT

Dear Sir/ Madam,

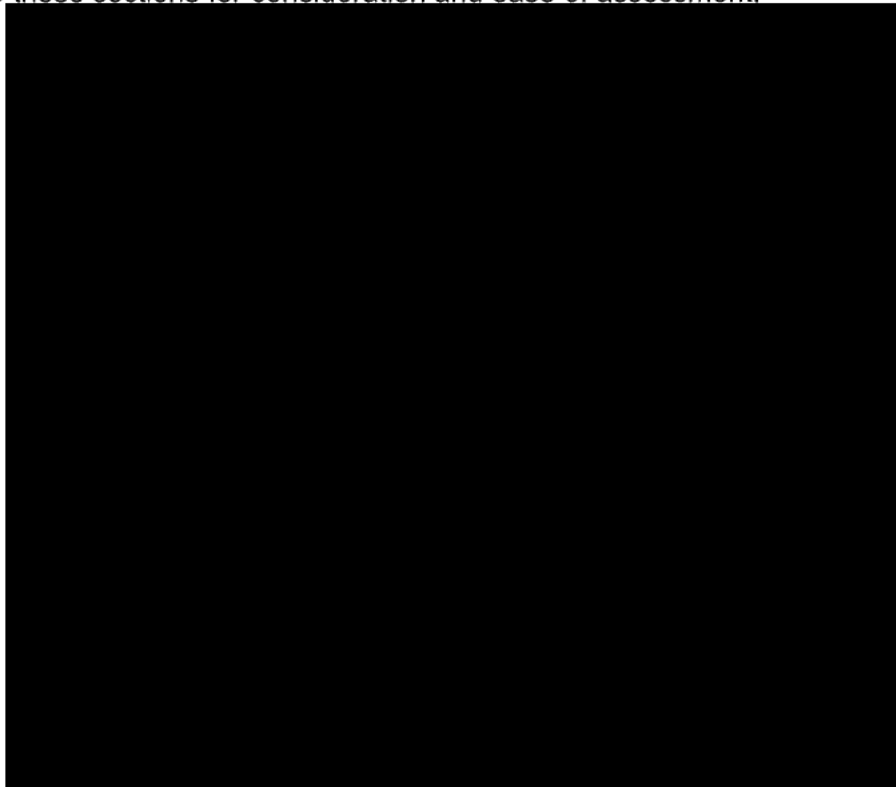
**SUBMISSION ON THE WESTERN SYDNEY AEROTROPOLIS DRAFT
PRECINCT PLANS – 17 Thomas Laycock Place, Bringelly**

This submission has been prepared by Land Evolution Pty Ltd on behalf of Hy Lam and Kim Lam being the owners of [REDACTED] Thomas Laycock Place, Bringelly [REDACTED]. Their property is located within the Aerotropolis Core of the Draft Precinct Plan area, as shown in **Figure 1** below, and is directly impacted by the precinct planning. The purpose of the submission is to object to part of the land use proposed for their property and seek amendment to the Draft Precinct Plans. Failing this, we seek fair and equitable compensation for the proposed uses, which are lower value than its current form and perceived development value based on zoning & the resilient nature of the site.

1.0 BACKGROUND

Under the Draft Precinct Plan, part of the site is proposed to be open space as shown in the diagram below. This submission seeks to change this land use to a development use that is generally consistent with the surrounding area.

We have considered the technical reports, key drivers and modification requirements under Section 1.4 of the Draft Precinct Plan in preparing of this submission. Our assessment and findings are broken up into these sections for consideration and ease of assessment.



2.0 TECHNICAL ASSESSMENT OF DEVELOPMENT CONSTRAINTS

This section of the submission considers the developability of the site with regards to the key Technical Reports annexed to the Draft Precinct Plan. It seeks to understand any natural constraints to ensure that the site is suitable for development.

2.1 STORMWATER, FLOODING & WATER SENSITIVE URBAN DESIGN (WSUD)

The stormwater technical report prepared by Sydney Water indicates that no part of the property is subject to flooding in the 1% AEP event or even the 50% AEP event.

No existing water bodies are present on the site and no water quality or detention components are proposed on the site.

This indicates that from a stormwater, flooding & WSUD perspective the site is unconstrained and suitable for development.

2.2 HERITAGE

The site is not impacted by any heritage restrictions and no known artifacts have been identified on or within 200m of the site (confirmed via AHIMS Search). Heritage restrictions should not restrict full development of the site in any way.

2.3 ECOLOGY

No part of the site has been identified as having ecological constraints as shown in **Figure 3**. As such, from an ecology perspective, the site is suitable for development.

2.4 TRANSPORT & TRAFFIC

The site is accessed off Thomas Laycock Place which is currently a cul-de-sac. The road is set to be upgraded and reconfigured to a through road under the draft precinct plans but will remain a local road typology. A collector road is set to dissect the rear of the site heading in a north-south direction as shown in **Figure 4**. Another collector road runs along the northern boundary of the site.

Development of the parkland area would not have a significant impact on the road network as the major roads would not need to change. The parkland is not needed for pedestrian and cycleway connectivity as both of the proposed collector roads provide the required connectivity facilitating access in all directions.

2.5 SERVICEABILITY

The site could be serviced with local extensions to the proposed surrounding networks.

2.6 BUSHFIRE

No bushfire hazards have been identified on or near the site that would prevent development.

2.7 SOCIAL

The site is currently proposed to be partly mixed-use development and partly passive open space under the Draft Precinct Plan. No key social land uses have been identified on the site. Given the volume of passive open space within the draft precinct plan, a reduction in this area is not likely to have a significant social impact. In fact, the vision statement within the Aerotropolis Core identifies that the area is set to see an increase of between 20,000-24,000 residents and 50,000 to 60,000 workers. Given the site is close to the metro and easily accessible, it is ideally located to provide residential homes and workplaces that are easily accessible and socially desired.

2.8 URBAN DESIGN

The Urban Design of the Draft Aerotropolis Precinct Plans has been largely driven by the 5 layers of place being:

1. Blue Infrastructure (section 2.1 of this submission)
2. Green Infrastructure (section 2.3 of this submission)
3. Country (section 2.2 of this submission)
4. Connectivity (section 2.4 of this submission)
5. Community and Place (section 2.7 of this submission)

Each of these has been discussed within the technical assessment of this submission. It is possible that some of the assumptions in the Urban Design Report have led to restrictive development on this site, incorrectly, as discussed below.

Linear parks have not been identified as a key urban design feature along main roads though the precinct. The planning principles have instead led to linear parks following natural features, in particular creek lines. This is evidenced as the linear park shown on the subject property has been identified as a linear park along a tributary creek throughout the Urban Design Report (see diagrams on pages 130, 195 etc.). However, there is no identified creek along this area, so the classification appears to be an error.

Furthermore, the view lines identified on Page 210 of the Urban Design & Landscape Report are not apparent on site. It appears that the existing topography through the area, which is very flat, has not been considered. Given the topography, the views are not likely to be achieved.

The above suggests that there is limited need for a park in this location from an urban design perspective. Given our assessment, supported by the technical reports, determines that the site is resilient and suitable for development, and has already been re-zoned as such, classifying the area as parkland does not meet the primary objectives of the Precinct Planning as discussed in Section 3 of the submission.

The area identified as park within the site does not:

- Follow/ utilise the creek network
- Seek to retain the existing road network in this area
- Seek to retain any existing vegetation
- Maintain a key corridor for sight lines/ views

If developed the site would:

- Provide additional urban density

- Better consider the impact to existing residents, in both the temporary and permanent outcomes
- Maximize employment density in close proximity to the metro station

If left as parkland, the site would also become an additional and likely unwanted maintenance burden for Council's.

3.0 KEY OBJECTIVES OF THE PRECINCT PLAN

This section of the submission assesses development potential of the site against the Key Objectives of the Aerotropolis Precinct Plan.

3.1 OBJECTIVE 1 – AN ACCESSIBLE & WELL-CONNECTED AEROTROPOLIS

The assessment under Section 2.4 of this submission demonstrates that the proposal to develop the parkland area would not have a negative impact to the connectivity of the Aerotropolis. Further to this, development of the parkland area within the site would enable an increase in jobs and population in one of the most well-connected areas of the aerotropolis and therefore provide more opportunities to meet Objective 1.

3.2 OBJECTIVE 2 – HIGH-VALUE JOBS GROWTH IS ENABLED, AND EXISTING EMPLOYMENT ENHANCED

Restricting the site to parkland is a contradiction to Objective 2 as it limits the opportunity to create more jobs and employment in a key area of the precinct, near the proposed metro, on land that is entirely constraint free and suitable for development. Development of the site would better meet Objective 2 as it would facilitate job creation.

3.3 OBJECTIVE 3 – SAFEGUARD AIRPORT OPERATIONS

Development of the site would be in line with the proposed surrounding land uses and would not have a negative impact on the airport operations. Therefore, development of the site would meet Objective 3.

3.4 OBJECTIVE 4 – A LANDSCAPE-LED APPROACH TO URBAN DESIGN & PLANNING

The site is unconstrained with blue or green infrastructure and therefore can be developed to best meet the objectives of the re-zoning and precinct planning without impacting the intention of a landscape led approach. Significant landscaping is being implemented as part of any development site in alignment with the Objective.

3.5 OBJECTIVE 5 – A SUSTAINABLE LOW CARBON AEROTROPOLIS THAT EMBEDS THE CIRCULAR ECONOMY

Density is key to a circular economy as increased population and local business' that support each other improve the sustainability of each business through the area. Development of the site would enhance the circular economy as the existing landholding would likely see an increase in additional jobs and social infrastructure in an area of the precinct than requires dense population for success. Further to this, the site is near the proposed metro which would encourage commuting on public transport rather than individual vehicles. This will assist in meeting sustainability and carbon targets. Objective 5 would be met with development of the site.

3.6 OBJECTIVE 6 – A RESILIENT AND ADAPTABLE AEROTROPOLIS

We have assessed the site for resilience under the technical assessment of this report and there were no issues identified that would restrict resilient development. Key Driver 6 of the Draft Precinct Plan suggests that resilient development land will be pursued for new buildings, places and infrastructure. As it currently stands, the Precinct plan does not meet the objective of Key Driver 6,

but it would if amended to incorporate development. Development of the site would better meet objective 6 than its current form.

3.7 OBJECTIVE 7 – INFRASTRUCTURE THAT CONNECTS AND SERVICES THE WESTERN PARKLAND CITY

Development of the site would have minimal impact on servicing and infrastructure as identified in the technical assessment, Objective 7 could be met.

3.8 OBJECTIVE 8 – A COLLABORATIVE APPROACH TO PLANNING AND DELIVERY

The proposed development of the site has been assessed against relevant expert reports from a variety of disciplines, as per Section 2 of this submission. This ensures that it maintains the collaborative approach to planning from a multi-disciplinary perspective.

This submission is feedback as part of the departments legal obligation to exhibit the draft precinct plan. Objective 8 can only be met if a collaborative approach with the community is also taken. This would involve each submission being seriously considered and changes not just pondered but implemented based on merit.

3.9 OBJECTIVE 9 – DIVERSE, AFFORDABLE, HEALTHY, RESILIENT AND WELL-LOCATED HOUSING

The site is in one of the best locations within the Precinct Plan for development. It is close to the aerotropolis station, adjoins major roads and is resilient against natural constraints. It is in a position to provide more residential and employment opportunities close to future homes therefore meeting Objective 9.

3.10 OBJECTIVE 10 – SOCIAL AND CULTURAL INFRASTRUCTURE THAT STRENGTHENS COMMUNITIES

Given the abundance of passive open space in the area the current proposal provides limited social benefits. Development of the site would likely provide opportunity for increase social amenity as identified in Section 2.7 of this submission. Therefore, development of the site would better meet Objective 10.

3.11 OBJECTIVE 11 – GREAT PLACES THAT CELEBRATE LOCAL CHARACTER AND BRING PEOPLE TOGETHER

Development of the site gives opportunity to create more great places for people to live and work. Increasing the population in the area adds to the intended character of the Aerotropolis Core and therefore would meet Objective 11.

4.0 ASSESSMENT AGAINST KEY ITEMS REQUIRED FOR MODIFICATION

Section 1.4 of the Draft Aerotropolis Precinct Plan outlines performance criteria for modification of the Precinct Plan. Given the land in question is relatively small in size, when compared to the Draft Precinct Plan Area, it is unlikely to be permissible to amend the plan at a later date via a planning proposal or a master plan development application. As such, it is imperative that the Draft Precinct Plans be amended now, prior to being adopted, to provide the best outcome for the site. Here we have assessed the performance criteria to assist in recognizing the better outcome and justify the amendment.

4.1 PLACE BASED OBJECTIVE OF THE WSAP

The key objectives of the Draft Precinct Plan have been addressed in Section 3 of this submission. All objectives can be met with the proposed change therefore, it can be supported for this element.

4.2 INTEGRITY OF THE BLUE-GREEN INFRASTRUCTURE, TRANSPORT INFRASTRUCTURE, HIERARCHY OF CENTRE'S AND SOCIAL INFRASTRUCTURE FRAMEWORK

Each of these items are addressed in Section 2 of this submission. The integrity of each element is met as part of the proposed change therefore, it can be supported for this element.

4.3 SUPERIOR URBAN DESIGN

The current urban design through this area identifies much of the site as parkland, but this is not justified when considering the Urban Design Principles set out in the Precinct Plan technical report and discussed under Section 2.8 of this submission.

In particular the area identified as park within the site does not:

- Follow/ utilise the creek network
- Seek to retain the existing road network in this area
- Seek to retain any existing vegetation
- Maintain a key corridor for sight lines/ views

If developed the site would:

- Provide additional urban density
- Better consider the impact to existing residents, in both the temporary and permanent outcomes
- Maximize employment density in close proximity to the metro station

If the site were to be developed, more of the key urban design principles would be met. In particular additional urban density and employment opportunities close to the metro would be achieved as discussed in detail under Section 2.8 of this submission. Given this, a superior urban design outcome would be achieved if the site were developed.

4.4 ENHANCEMENT OF STRATEGIC VISION

By demonstrating compliance with the key objectives under Section 3 of this submission, we have shown that the proposal meets the strategic vision for the Aerotropolis Precinct. As it currently stands resilient land is not adequately used in a key area of the aerotropolis close to the metro. Development of the site would better align with the strategic vision.

4.5 ALIGNMENT WITH OBJECTIVES

The key objectives of the Draft Precinct Plan have been addressed in Section 3 of this submission. All objectives can be met with the proposed change therefore, it can be supported for this element.

4.6 ALIGNMENT WITH TRANSPORT PLAN

The transport plan has been addressed under Section 2.4 of this submission. Converting the parkland to development land would have minimal impact to the transport plan and given this could be supported for this item.

4.7 STAGING WILL NOT BE NEGATIVELY IMPACTED

The proposal is consistent with current staging and therefore will not impact the staging.

4.8 ALIGNMENT WITH THE LAND USE, HEIGHT & MINIMUM SIZE OBJECTIVES

The proposal seeks to amend part of the land use identified within the site from park to development. However, it would be consistent with proposed surrounding land uses and the land use objectives, height and minimum size objectives identified through relevant planning criteria.

5.0 CONCLUSION

It would appear that part of the site has been earmarked as greenspace unnecessarily as it was considered a parkland along a creek line (which it is not) and because it sought to maintain view lines (that don't appear to exist).

The entire site appears to be free from natural constraints making it suitable for development.

We have assessed development of the parkland area against the Key Objectives of the Draft Precinct Plan and found that the proposal could meet all of the Objectives.

We have assessed the proposal to develop the parkland area against the modification requirements identified within Section 1.4 of the Draft Precinct Plan and conclude that it can be supported.

Given this, we believe that the proposal should be considered for amendment, and that the site should have the same/ similar development use as surrounding landholdings. Failing this, the landowner should be fully and fairly compensated for the change of use in the area to a lower order use.

Should you have any queries please do not hesitate to contact us.

Yours Sincerely,



Jason Stephenson

Director – Land Evolution Pty Ltd

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