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**Sent:** Wednesday, 10 March 2021 1:24 PM  
**To:** PPO Engagement  
**Cc:** eplanning.exhibitions@planning.nsw.gov.au  
**Subject:** Webform submission from: Western Sydney Aerotropolis Draft Precinct Plans  
**Attachments:** submission-letter.pdf

Submitted on Wed, 10/03/2021 - 13:22

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Anthony

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tobia

**I would like my submission to remain confidential**

No

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**Submission file**

[submission-letter.pdf](#)

**Submission**

Submission: Mainstream Electrical Pty Ltd strongly supports the planning for the Aerotropolis and support the implementation of this planning strategy. However, the primary reason for this submission is to demonstrate the lack of attention and details surrounding infrastructure servicing for the Western Sydney Aerotropolis Area. Calibre is pleased to submit a submission in reference to the Western Sydney Aerotropolis Draft Planning Package currently on exhibition for public comments, further clarification for the following matters will be highly recommended. Please refer to the attached letter.

**I agree to the above statement**

Yes

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Western Sydney Aerotropolis Draft Precinct Plan Submission Letter

On Behalf of

Mainstream Electrical Pty Ltd

10 March 2021

Western Sydney Planning Partnership  
PO Box 257  
Parramatta NSW 2124

## **Western Sydney Aerotropolis Draft Planning Package - Submission**

This letter is in reference to the exhibition of the draft Western Sydney Aerotropolis Planning Package released by the *Department of Planning, Industry and Environment* in conjunction with the Western Sydney Planning Partnership.

Mainstream Electrical Pty Ltd strongly supports the planning for the Aerotropolis and support the implementation of this planning strategy. However, the primary reason for this submission is to demonstrate the lack of attention and details surrounding infrastructure servicing for the Western Sydney Aerotropolis Area.

Mainstream Electrical Pty Ltd is pleased to submit a submission in reference to the Western Sydney Aerotropolis Draft Planning Package currently on exhibition for public comments, further clarification for the following matters will be highly recommended.

### **1 DRAFT WESTERN SYDNEY AEROTROPOLIS PLAN**

The draft Western Sydney Aerotropolis Plan was released in December of 2019 for public exhibition and comment. The draft Aerotropolis Plan builds upon the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan (LUIIP) (August 2018).

The draft plan lacks significant detail surrounding the infrastructure planning and delivery, specifically water and waste water services for the land to be rezoned for urban development. The current Sydney Water - Growth Servicing Plan addresses short term outcomes for 2019 – 2024. However, there is still a need for consolidated work beyond this period for the next 5/10 years for the servicing arrangements for:

- Western Sydney Aerotropolis including the precincts of Rossmore, North Luddenham, Kemps Creek, Dwyer Road, Badgerys Creek, Mamre Road as well as the Aerotropolis Core;
- The South West Priority Growth Centre; and
- The expansion of the Greater Western Sydney Employment Area.

The Aerotropolis – shaping objectives and principles includes the goal for Infrastructure and Collaboration, being Objective 7 – Infrastructure that connects and services the Western Parkland City as it grows. However, for this objective to be attained through the planning for the Western Sydney Aerotropolis, it is recommended that the provision of strategy for the delivery of utility servicing arrangements to be paramount with the timing and cost effectiveness, to support the orderly development of the Aerotropolis and South Creek region.

#### **1.1 Section 4 – Infrastructure**

The infrastructure strategy outlined within the Western Sydney Aerotropolis Plan lacks significant detail surrounding the servicing strategy, specifically surrounding water and waste water provision.

The LUIIP (August 2018) in respect to infrastructure planning stated *‘that the second stage of the land use plan include a flexible servicing strategy that will provide long-term direction, ensure certainty of utility supply and allow for alternative servicing solutions as technologies and hybrid servicing methodologies*. However, the LUIIP identifies constraints such as fragmented land, isolated development separated from existing infrastructure, out of sequence developments and capacity for development to pay for infrastructure. In comparison to the documents released within the Western Sydney Aerotropolis Planning package this did not include any infrastructure planning strategy.

##### **1.1.1 Section 4.5 Integrated water, wastewater and recycled water services**

The Western Sydney Aerotropolis Plan does not specify a delivery or implementation strategy for water, wastewater and recycled water services. These services are essential to the orderly development of the Aerotropolis region. The areas to be rezoned that include the Aerotropolis core, and surrounding Rossmore regions will likely be subject to mixed use and residential development that requires a servicing strategy to be in place to influence the timing of development. It is recommended that this strategy is developed in conjunction with Sydney Water, relevant stakeholders and government authorities to ensure future development can be achieved in an orderly manner.

### 1.1.2 Section 6.4.2 Floodplain Management

Further details surrounding the flood management strategies and how it should be integrated with stormwater management for the Aerotropolis Area should be included.

Although the 1 in 100-year flood level has been adopted rather than the PMF level, a large number of the Aerotropolis area, especially South Creek and Wianamatta – South Creek Precinct is flood prone. Further details surrounding the proposed uses of the precinct and water management strategies should be included within the Western Sydney Aerotropolis Plan.

## 1.2 Section 8 – Infrastructure funding and provision

### 1.2.1 Section 8.4 Utilities and Services

Although the Western Sydney Aerotropolis Plan does identify the current lack of trunk infrastructure within the Aerotropolis, it lacks detail as to what strategy will be implemented in order to service the Aerotropolis for future development

A flexible servicing strategy will ensure that the individual characteristics, objectives and uses of each precinct can be catered for, however, this plan lacks enough detail that alludes to how this objective will be achieved. It is to be noted that the Western Sydney Aerotropolis LUIP – Stage 1 mentioned that servicing strategies and details would be provided within the subject plan, being the draft Western Sydney Aerotropolis Plan.

### 1.2.2 Section 7.1.2 Common implementation strategies

Planning for state and local infrastructure funding discussions needs to be conducted with Sydney Water in addition to local Councils and planning partnerships.

Further, the current fragmented ownership of many of the precincts surrounding the Aerotropolis, such as Rossmore and the Aerotropolis Core needs to be considered when devising precinct plans for these regions. Additionally, it is recommended that precinct plans include further detail about indicative road patterns to ensure further development can occur efficiently in the future.

## 2 WESTERN SYDNEY AEROTROPOLIS DISCUSSION PAPER ON THE SEPP

### 2.1.1 2.11 Essential Infrastructure Provision

The proposed SEPP details that ‘an integrated water solution will consider opportunities for water provision and re-use, and wastewater within developments as the servicing strategy is prepared for the precincts’.

*“The proposed SEPP will require the consent authority to be satisfied, prior to development applications being approved, that public utility infrastructure will be provided, or alternate and adequate arrangements to make that infrastructure available have been made”.* The wording of this clause implies that alternate servicing arrangements can be provided by developers if public utilities are yet to be provided.

This may lead to the fragmentation of servicing strategies rather than a holistic, orderly development approach. Therefore, resulting in negative development outcomes which are not consistent with the wider objectives of the Aerotropolis region.

## 2.2 Part 8 – Planning Pathways

### 2.2.1 Section 8.6 – Staging and Sequencing of development

The discussion paper on the draft SEPP details that the relevant precinct plans will include a staging plan that *‘proposes the staging and sequencing of infrastructure provision to inform the roll out of development’* This will ensure that the delivery of infrastructure is aligned with growth’.

It is recommended that any staging and sequencing plan included in the draft SEPP details about the future road network within each precinct in order to facilitate orderly development that can be integrated with servicing and infrastructure provision.

## 3 DRAFT WESTERN SYDNEY AEROTROPOLIS DEVELOPMENT CONTROL PLAN PHASE 1

As section 2 of the DCP is yet to be finalised, it is premature to comment on the DCP as a whole. However, it is recommended that the road layout for the Precincts is finalised and included within the DCP, to allow for development applications for new development within the Rossmore and the Aerotropolis core regions to progress, rather than be halted. Potential for site specific DCP’s to be developed prior to the gazettal of the relevant precinct plans is supported and encouraged, especially in areas with fragmented ownership.

#### 4 PRECINCT PLANNING

Section 8.3 of the SEPP discussion paper details that the SEPP will introduce requirements for DA's submitted after notification of the proposed SEPP. One of these requirements is to ensure that any development proposals do not result in fragmentation of landholdings. This requirement is not supported, as a majority of the land located within the Aerotropolis Core and Rossmore consist of fragmented ownerships, and therefore any application on this land that results in fragmented ownership would hinder development efforts.

It should also be noted that due to a large fragmented ownership within the Aerotropolis Core and Rossmore regions, a precinct wide DCP may not be suitable, as many of the current land owners may choose not to develop on their land. As a result, a DCP needs to be prepared prior to gazettal.

#### 5 CONCLUSION

The Western Sydney Aerotropolis Plan and supporting State Environmental Planning Policy should occur in conjunction with the release of a water and wastewater servicing strategy for the whole Aerotropolis and South West Growth Area rather than just the Nancy Bird Walton Airport site, as it will ensure future development within this region can occur seamlessly and in a coordinated manner.

In summary, the main issues of concern are:

- Lack of infrastructure and delivery implementation strategy for water and wastewater services within the Draft Western Sydney Aerotropolis Plan;
- Lack of details regarding the proposed uses and water management strategies for the South Creek and Wianamatta Precinct;
- Lack of detail surrounding the strategy to service the Aerotropolis for future development and potential issues regarding the fragmented ownership of many of the proposed precincts;
- Inclusion of alternate or adequate arrangements for public utility infrastructure within the draft SEPP, which may lead to fragmentation of servicing strategies;
- Lack of detail surrounding future road network within each precinct; and
- The high levels of fragmented ownership of land within the Aerotropolis Core and Rossmore Precincts, which would be affected by the draft SEPP and its limitations to restrict development proposals that result in fragmented landholdings. This would restrict any future development proposals within these affected regions and is not supported.

Yours sincerely

**Mainstream Electrical Pty Ltd**



**Anthony Tobia**

Managing Director