

Mark Makari

e: [REDACTED]
m: [REDACTED]

10 March 2021

Att: Director of Western Sydney Aerotropolis
Department of Planning, Industry and Environment
12 Darcy Street
Parramatta NSW 2150

By: Online lodgment

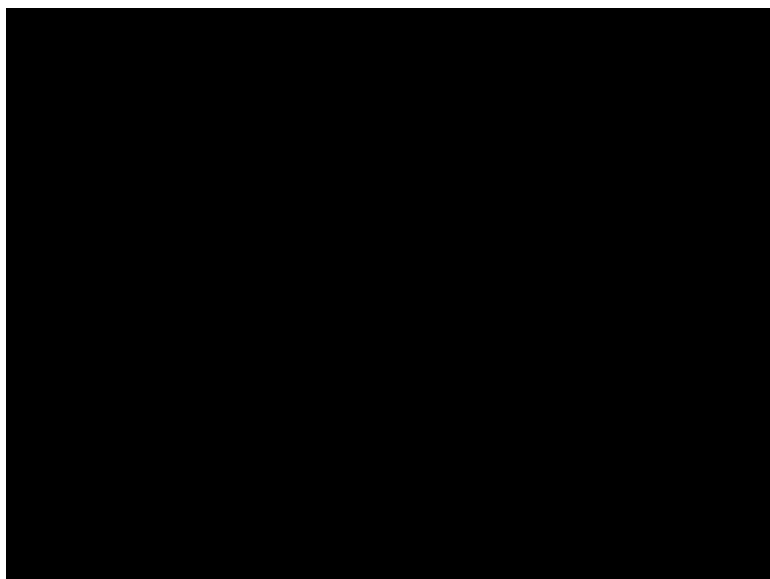
Dear Director,

WESTERN SYDNEY AEROTROPOLIS PRECINCTS SUBMISSION

Thank you for the opportunity to provide a submission on the draft Aerotropolis precinct plans.

I am the Director for [REDACTED] Derwent Road Pty Ltd who has entered into a contract for the purchase of [REDACTED] The Northern Rd Bringelly.

[REDACTED] The Northern Road Bringelly is zoned mixed-use and sits within the Aerotropolis core metropolitan centre. We are within a 700m radius of the metro station:



Whilst we are generally supportive of the draft documents, we have strong objections to the mapping that has been developed which are clearly at odds with the written reports and plans in relation to our property.

Our areas of concern are outlined below under the following headings:

- Amalgamation parcels
- Land use and Built Form
- Building Height and
- FSR

Amalgamation Parcels:

The draft documents state that amalgamated parcels should be on 5ha lots yet on the amalgamation maps our property is shown in a super lot of 16ha. This pools in more than 10 individually owned parcels of land which will be near impossible to coordinate as one development lot. We opposed this super lot and would like to be brought in line with all other landowners in the Aerotropolis core and request that the map is revised to show us in a 5ha amalgamation lot.

Land use & built form

The land use and built form allocated to our property as per the draft Combined Land Use Plan map is inconsistent with the written text in the draft reports. The draft map shows our property as business enterprise, rather than a mixed-use land use.

See below relevant locations in the draft plans which stipulate a mixed-use land use which is also consistent with our SEPP zoning of Mixed-Use:

Text from the reports on exhibition	What has been shown on the draft maps contained in the reports & our comment
In the precinct plan under 3.4.2 Land use and built form - Requirement – Aerotropolis core LU6 states “Prioritize mixed-use employment and residential development within 800m of the metro station...”	This requirement has not occurred we are 700m from the metro station yet and the mixed-use was allocated further south of us in the opposite direction of the metro station – approximately 850m – 1800m from the metro station.
In the precinct plan under 3.4.2 Land use and built form, Requirement all precincts LU2 states Prioritize mixed-use employment and residential development within 800m of the metro station..”	It is a requirement that mixed use employment and residential is prioritized within 800m of the metro station. This has not occurred and the mixed-use was allocated further south of us in the opposite direction of the metro station – approximately 850m – 1800m from the metro station.
In the precinct plan under 3.4.2 Land use and built form, Objective LU2 states “... achieve the objectives of land use zones, by providing the requirements for the type and location of land uses to achieve the Aerotropolis vision, including creating a 24/7 centre”	Our property is in the centre, we are 700m from the metro and to create a 24/7 centre means that we must have residential envisioned and permitted as part of our land use.

<p>In the overview report under Aerotropolis Core, Metropolitan Centre, bullet point 6 reads “Active streets within an 800m walkable catchment of the metro station”</p>	<p>Active streets are active during and after business hours. This can only be achieved with a mixed-use land use. We have not been shown a mixed-use land use yet we are from 700m of the metro</p>
<p>In the precinct plan under 3.4.1 Hierarchy of centres, Requirements LU1 Locate centres as identified in Figure 29....</p> <p>Fig 29 shows our property within the Metro radius of 800m and notes “...acts as a regional – scale mixed-use centre...”</p>	<p>We have not been shown as mixed-use in the building form maps. To be rectified please.</p>
<p>In the precinct plan under 3.4.1 Hierarchy of centres, Requirements LU2 Follow the hierarchy of centres within the Aerotropolis outlined in Table 2...</p> <p>Table 2 shows: Centre type – Metropolitan and Aerotropolis Core Role and Intent – ...includes multiuse purposes .. Critical locational criteria – Part of a mixed-use precinct... initially focused around 800m of the metro</p>	<p>We are within the 800m of the metro. According to Table 2 we should be prioritized for a mixed-use land use before anyone else. This has not occurred as properties to the south of us more than 1800m from the metro have been shown as mixed use and we have been reverted to a fringe use of business enterprise.</p> <p>Mapping needs to be corrected in line with the actual written requirements of these draft plans.</p>

Building Height

The building heights as shown on the mapping are inconsistent with the heights as indicated throughout the draft plans. We have been mapped with a height of 40m-52.5m, rather than the 55m-70m as the draft plans say we should be.

Below are the occasions where height requirements are referred to in the draft documents:

Text from the reports on exhibition	What has been shown on the draft maps contained in the reports & our comment
<p>In the overview report under The height and Built form framework On Page 12, 2nd Bullet point “Promoting the densest and tallest form within the mixed-use center of the Aerotropolis Core”</p>	<p>We are zoned mixed-use, we are in the mixed-use core yet we have not been provided with the tallest form. The building heights of the highest building footprints have jumped us and been provided to properties adjacent to us but further south of the metro more than 1800m from the metro station yet we are 700m from the metro.</p>
<p>In the overview report under the Maximum heights of buildings table on pg 13, Mixed use, Centre metropolitan, core shows a height of 55-70m</p> <p>This table is also shown in the precinct plan Table 3 under 3.4.3 Height.</p>	<p>We are withing 800m of the metro - the core of the Mixed-use center, yet the heights in this table have not been applied when it came to the mapping.</p>

	These height have though been applied to properties near us but further away from the metro station.
In the precinct plan under 3.4.2 Land use and built form, Objective LU4 states “.. highest built form and densities in major centres serviced by Sydney Metro”	Our property is located in the centre, we are 700m from the metro but were not provided with the highest built form and densities. The highest built forms are provided further away from the metro to our south and south east
In the precinct plan under 3.4.3 Height, Objective LU2 states “.. apply the greatest height and urban density in the Aerotropolis core... around the metro station”	We are in the Aerotropolis Core but the greatest height has not been applied to us. The greatest height has been allocated to land further away from the station approx. 800m – 1800m

FSR

We strongly object to the highest densities being allocated outside of the 800m radius of the metro (up to 1800m away) and request that maps are amended to reflect the objectives and requirements of the draft plans. We have been provided with an FSR of 2.5 – 3:1 rather than the 3 - 3.5:1 as indicated we must receive, in the draft documents,

See below the numerous occasions where FSR / Density is referred to in relation to our location:

What the reports state should occur	Our comment and what has been shown on the maps
In the overview report under The height and Built form framework On Page 12, 2 nd Bullet point “Promoting the densest and tallest form within the mixed-use center of the Aerotropolis Core”	We are zoned mixed-use, we are in the mixed-use core yet we have not been provided with the densest or tallest form. The densest buildings have jumped us and been provided to properties adjacent to us but further south more than 1800m from the metro station, yet we are 700m from the metro.
In the precinct plan under 3.4.2 Land use and built form, Objective LU4 states “.. highest built form and densities in major centres serviced by Sydney Metro”	Our property is in the centre, we are 700m from the metro but were not provided with the highest built form and densities.
In the precinct plan under 3.4.2 Land use and built form, Objective LU6 states “.. higher densities in particular close to metro stations but also adjacent to creeks and open space”	We have not been provided the “higher densities” as neighboring lots further away from the metro have been. Additionally, we are being asked to provide open space and LU6 encourages the higher densities adjacent to the open spaces.
In the precinct plan under 3.4.3 Height, Objective LU2 states “... apply the greatest height and urban density in the Aerotropolis core... around the metro station.”	We are in the Aerotropolis Core the greatest density has not been applied to us. The density has been allocated to land further away from the station from 800m – 1800m

<p>In the precinct plan under 3.4.4 Floor space ratio in mixed-use centres, Objective LU03 states “Locate higher intensity mixed-use employment and residential densities within 800m of the Metro Station.</p>	<p>This objective has not been met. The higher density has by passed us although we are within 700m of the metro station. The higher intensity mixed use has gone to properties further away from the metro station approximately 850m – 1800m away.</p>
<p>In the precinct plan under 3.4.4 Floor space ratio in mixed-use centres, Requirements LU1 states “Metropolitan centre FSR Range 3:1 – 3.5:1 (net over block)</p>	<p>We are within the metropolitan centre. We are 700m from the metro station and were not provided with this FSR but a lesser FSR. Lands to the south east of us approximately 800m – 1800m from the metro station were provided with this Metro centre FSR</p>

We request that the department amends the mapping to become consistent with the draft reports written objectives and requirements. Please stick with the findings and recommendations of the written text in the report and amend the mapping accordingly.

In summary we request:

1. Amalgamation lots are maintained to 5ha lots
2. That the mapping is amended as per the objectives and recommendations of the draft plans, which are:
 - a) Heights to 70m
 - b) FSR to 3.5:1
 - c) Land use to Business core – Mixed use.

Lastly, we request that once our submission is considered, that amended documents are re-exhibited to give us another chance to review any changes to the plans.

We are also open to meeting with the department or its representatives to discuss the items raised in this submission at a suitable time to you.

Regards,

Mark Makari