

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [PPO Engagement](#)
Cc: planning.exhibitions@planning.nsw.gov.au
Subject: Webform submission from: Western Sydney Aerotropolis Draft Precinct Plans
Date: Friday, 12 March 2021 11:49:48 AM
Attachments: [aerotropolis-precinct-plan-submission-█-badgerys-creek-road-1332-the-northern-road.pdf](#)

Submitted on Fri, 12/03/2021 - 11:48

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Peter

Last name

Lee

I would like my submission to remain confidential

No

Info

Email

█

Suburb/Town & Postcode

2153

Submission file

[aerotropolis-precinct-plan-submission-█-badgerys-creek-road-1332-the-northern-road.pdf](#)

Submission

Western Sydney Aerotropolis Draft Precinct Plans – Submission for Landowners of █ and █ Badgerys Creek Road and 1332 The Northern Road, Badgerys Creek.

I agree to the above statement

Yes

Disclaimer

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12 March 2021

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

Attention: Director of Western Sydney Aerotropolis

Subject: Western Sydney Aerotropolis Draft Precinct Plans – Submission for [REDACTED] Badgerys Creek Road and [REDACTED] The Northern Road.

Dear Director of Western Sydney Aerotropolis,

Calibre Professional Services Pty Ltd (Calibre) is making this submission to the Draft Aerotropolis Precinct Plan on behalf of landowners within the Aerotropolis Core Precinct. This submission regards [REDACTED] [REDACTED] also known as [REDACTED] Badgerys Creek Road Bringelly and [REDACTED] The Northern Road Bringelly.

The development area comprises three properties with an approximate area of 8 hectares which represents approximately 50% of the developable area of a larger precinct on the corner of Badgerys Creek Road and The Northern Road. The subject properties are outlined in red in Figure 1-1 below.

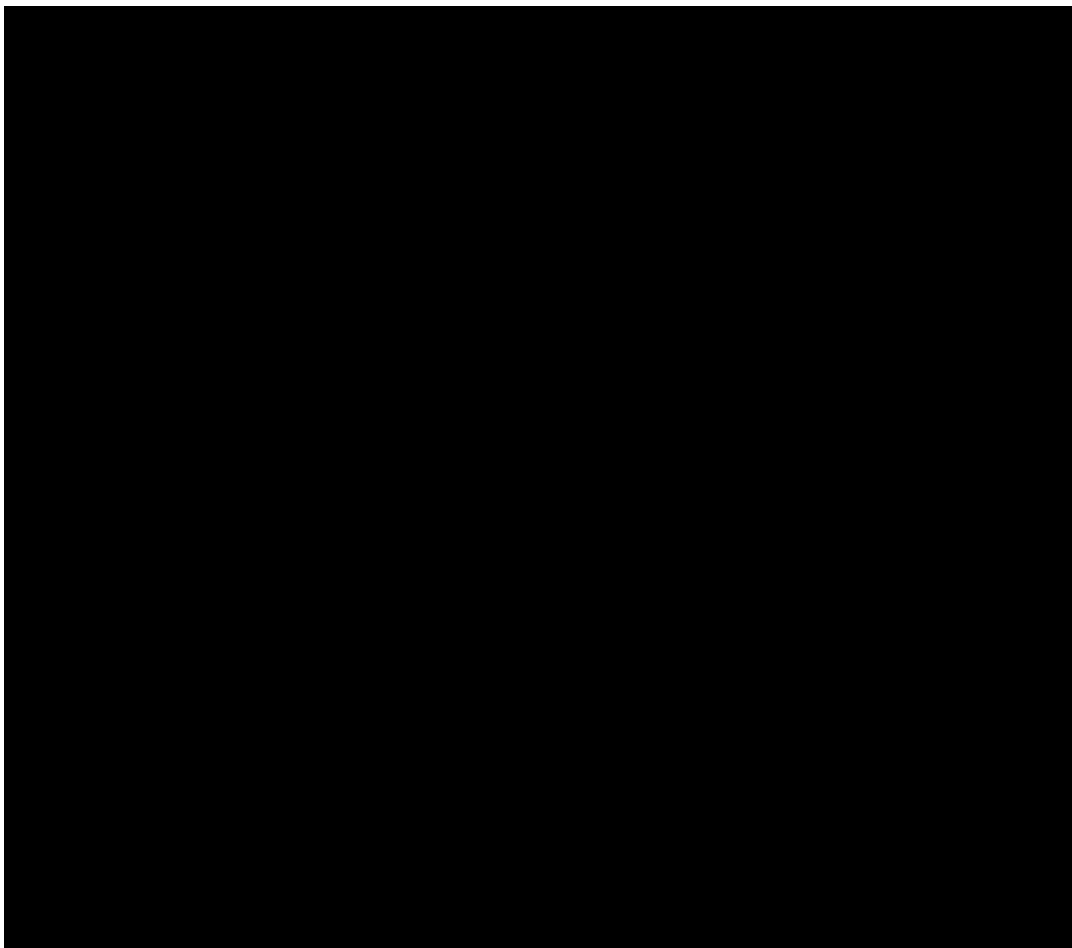


Figure 1-1: Site Context (Source: Draft Aerotropolis Precinct Plan)

1 STATE ENVIRONMENTAL PLANNING POLICY (WESTERN SYDNEY AEROTROPOLIS) 2020

1.1 Land Use Zoning

The *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020* adopts five flexible land use zones for the Aerotropolis Precinct. The subject sites are zoned MU Mixed Use and partly SP2 Infrastructure under the *SEPP (Western Sydney Aerotropolis) 2020*.

1.2 Aerotropolis Precinct Boundary

The subject sites are located in the Aerotropolis Core Precinct. The properties as a development area form a cornerstone gateway entrance to Badgerys Creek Road which is the main access road and entrance point to the Aerotropolis Core Precinct. Development at this entrance should be incentivised and maximised to establish a first impression upon entering the Aerotropolis Core Precinct.

2 INCONSISTENCIES/DISCREPENCIES IN THE EXHIBITED MATERIAL

From the exhibited material, there are inconsistencies and discrepancies between the plans in the Precinct Plan and Overview Report. These inconsistencies impact on the building height and floor space ratio for the subject properties which are highlighted below.

2.1 Maximum Building Height

The Height Plan from the Draft Aerotropolis Precinct Plan (Figure 31) specifies a maximum building height of 40-52.5m for the subject sites under as shown in Figure 2-1.

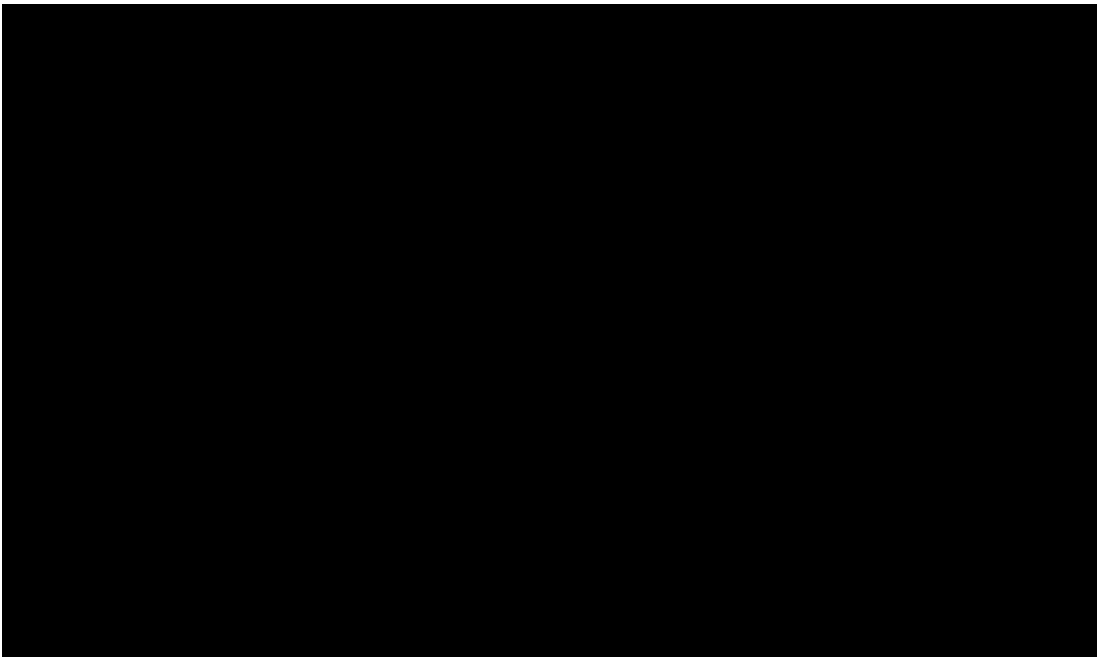


Figure 2-1: Maximum Building Height Map (Source: Draft Aerotropolis Precinct Plan – Figure 31)

The Maximum Building Height Map sourced from the Overview of Aerotropolis Core, Badgerys Creek and Wianamatta – South Creek Precinct Plans identifies a maximum building height of 15-46.5m for the subject sites as shown in Figure 2-2.

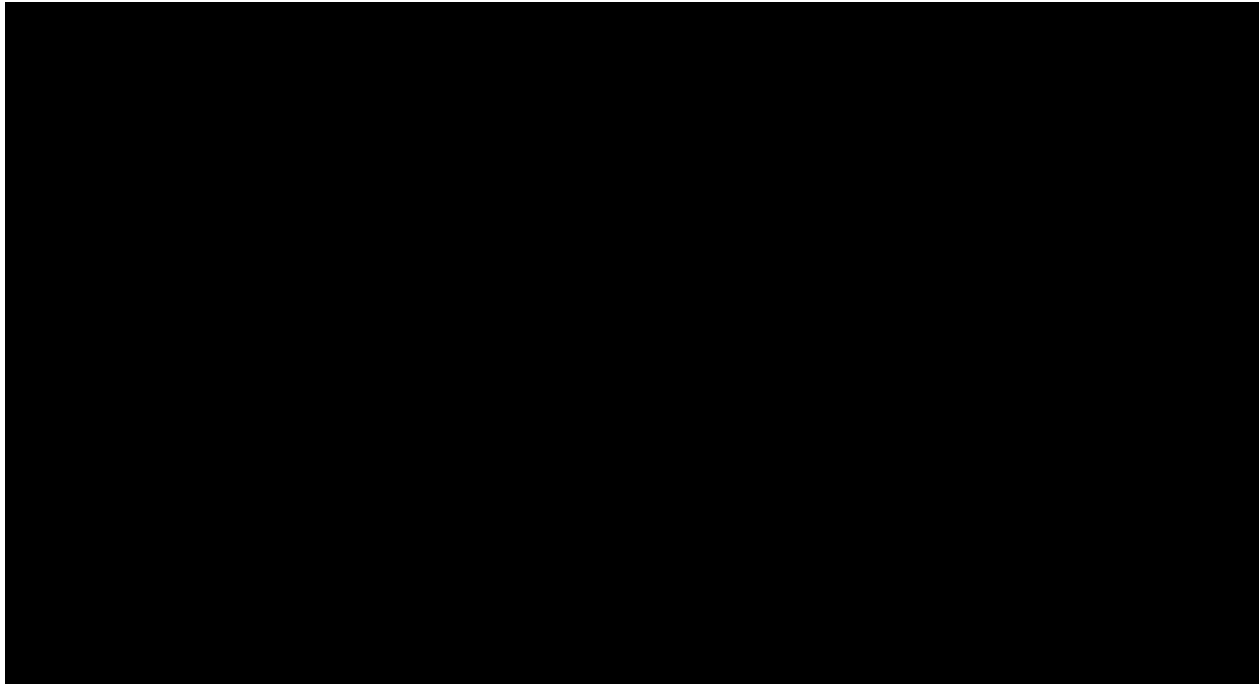


Figure 2-2: Maximum Building Height Map (Source: Overview of Aerotropolis Core Precinct Plans)

It is shown there are inconsistencies across the Draft Aerotropolis Precinct Plan Package. The Draft Aerotropolis Precinct Plan identifies a maximum building height of 40-52.5m for the subject properties. The Overview of the Precinct Plans should list a maximum building height of 40-52.5m for the subject sites yet identifies a maximum building height of 15-46.5m, **in contradiction to the Draft Aerotropolis Precinct Plan.**

It is requested that the maximum building height control within the Overview of Precinct Plans to be shown as 40-52.5m to ensure consistency with the Draft Aerotropolis Precinct Plan Package.

2.2 Floor Space Ratio

The Draft Aerotropolis Precinct Plan (Figure 32) specifies a floor space ratio of 0.6-2.4:1 for the subject sites as shown in Figure 4. The key accompanying the floor space ratio map does not specify an FSR of 0.6-2.4:1.

It is requested that the Floor Space Ratio map is updated to be consistent with the legend as identified for the subject site, with a FSR of 2.5-3.0.

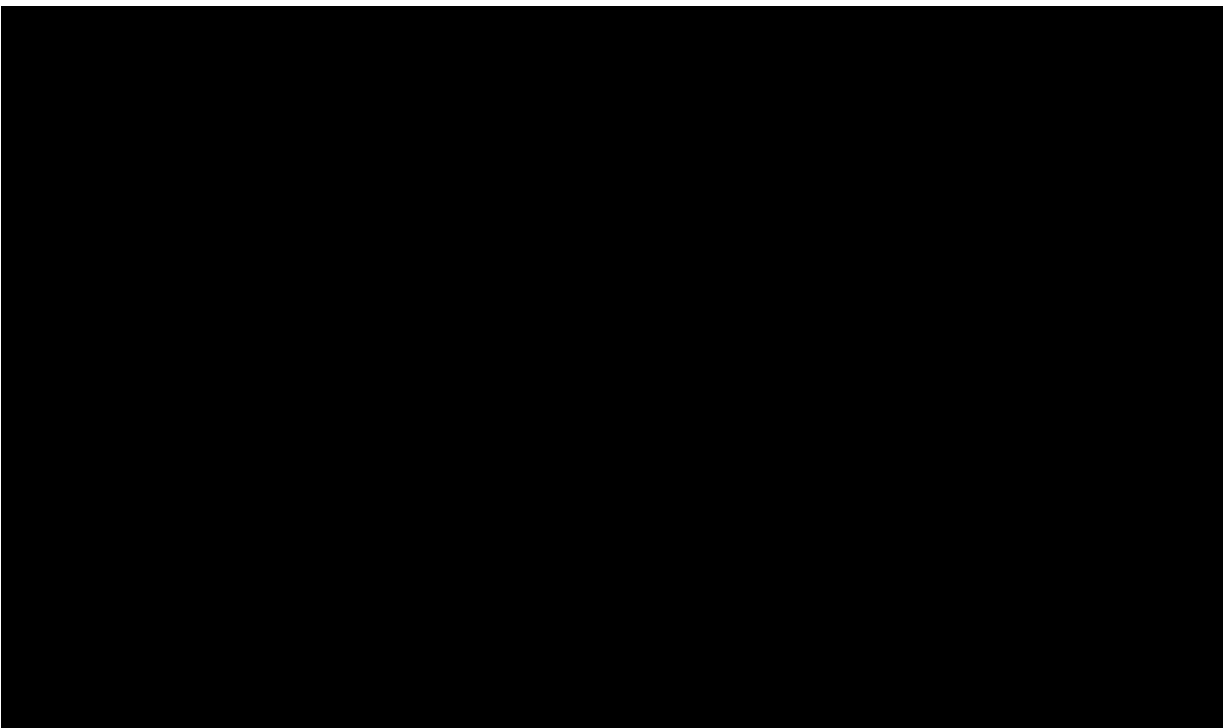


Figure 2-3: Floor Space Ratio Map (Source: Draft Aerotropolis Precinct Plan– Figure 32)

3 VISION – AEROTROPOLIS CORE

The subject sites are located within the Aerotropolis Core Precinct along The Northern Road and Badgerys Creek Road. The opportunity with the subject sites is to develop a mixed-use development in accordance with the vision outlined in the precinct plans.

3.1 Aerotropolis Core Precinct

The Draft Aerotropolis Precinct Plan identifies Aerotropolis Core as one of three main centres in the Aerotropolis and as “the primary centre of the Aerotropolis and will be the metropolitan centre”. Figure 3-1 below denotes the centre hierarchy showing subject sites to be located within a metropolitan centre being “a regional-scale mixed use centre focusing on a retail, services and business activity, serviced by a metro station”. The subject sites are located within the Aerotropolis Core.

The role of the centre is to “include multi use purposes for a diversity of uses and full range of community uses” with “development that creates residential density but ensures capacity for employment”. The subject sites meet the location criteria for the Aerotropolis Core metropolitan centre, being “initially focused around 800m of the Metro to Thompsons Creek”.

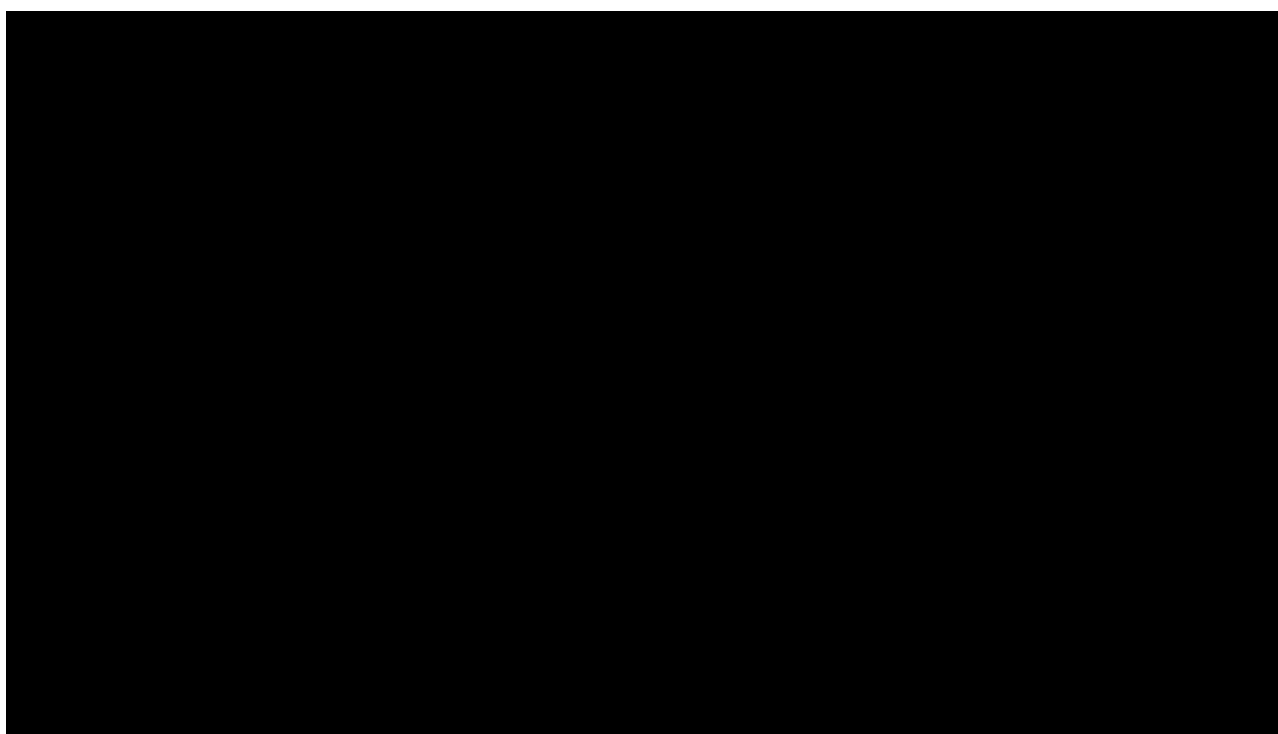


Figure 3-1: Centre Hierarchy (Source: Draft Aerotropolis Precinct Plan – Figure 29)

3.2 Transport Network

The Draft Aerotropolis Precinct Plan provides a Transport Network Map for the Western Sydney Aerotropolis detailing future transport corridors within the Aerotropolis. Figure 3-2 below shows that the subject sites are within the 800-metre walking catchment of the Aerotropolis Core Metro Station. The Draft Aerotropolis Precinct Plan envisions that the “Aerotropolis Core metropolitan centre is framed around the Metro Station”. The subject sites are within the walking catchment of the Aerotropolis Core and should be considered as part of the commercial – mixed use development sites.

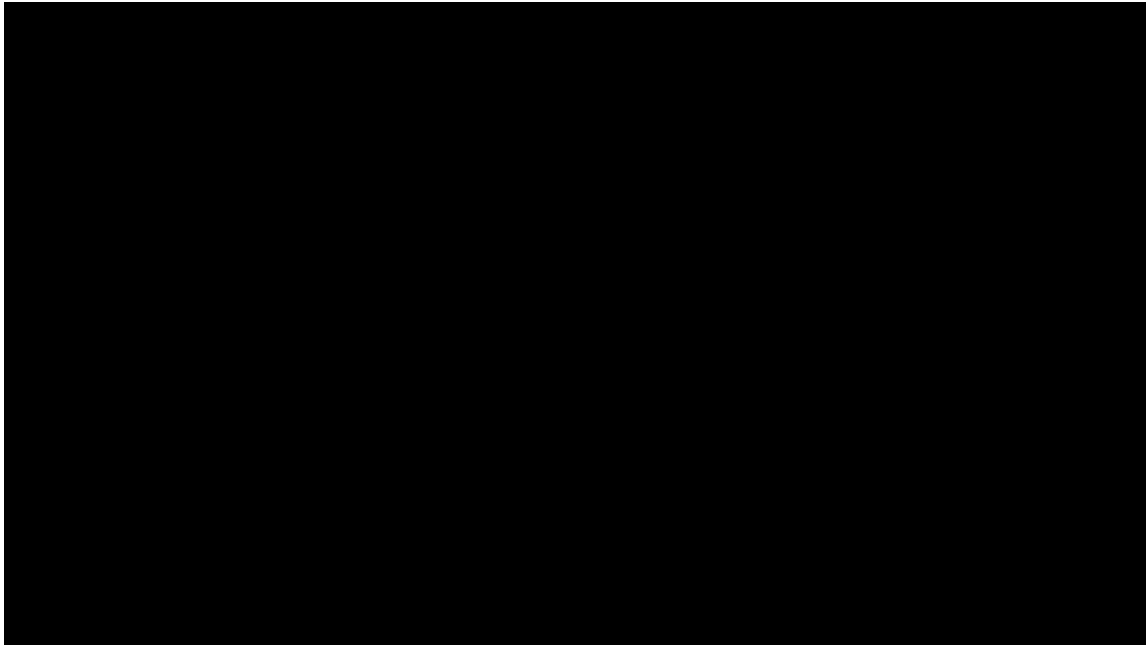


Figure 3-2: Transport Framework (Source: Draft Aerotropolis Precinct Plan)

3.3 Combined Land Use Plan

The Combined Land Use Plan (Figure 30) of The Draft Aerotropolis Precinct Plan identifies the majority of the Aerotropolis Core precinct to be a commercial centre - mixed use. However, the subject sites are shown to be business and enterprise despite being located within the Aerotropolis Core precinct and within 800m distance to the Aerotropolis Core Metro Station. The proposed land use controls pertaining to the subject sites should reflect intention to “locate high intensity employment/jobs and higher densities close to metro stations but also adjacent to creeks and open space” and “incorporate a height and density appropriate to centre hierarchies to optimise accessibility, with the highest built form and densities in major centres served by Sydney Metro” as specified in the Land Use and Built Form objectives.

It is recommended that Figure 30 – Combined Land Use Plan is amended to show the subjects sites to be commercial centre-mixed use similar to the remainder of the Aerotropolis Core precinct due to the sites strategic positioning within the Aerotropolis Core metropolitan centre, close proximity to a metro station and the adjacent Thompsons Creek. This would satisfy the requirement of Aerotropolis Core to “prioritise mixed use employment and residential development within 800m of the metro stations”, and intention to “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” which requires residential development as part of a mixed-use precinct.

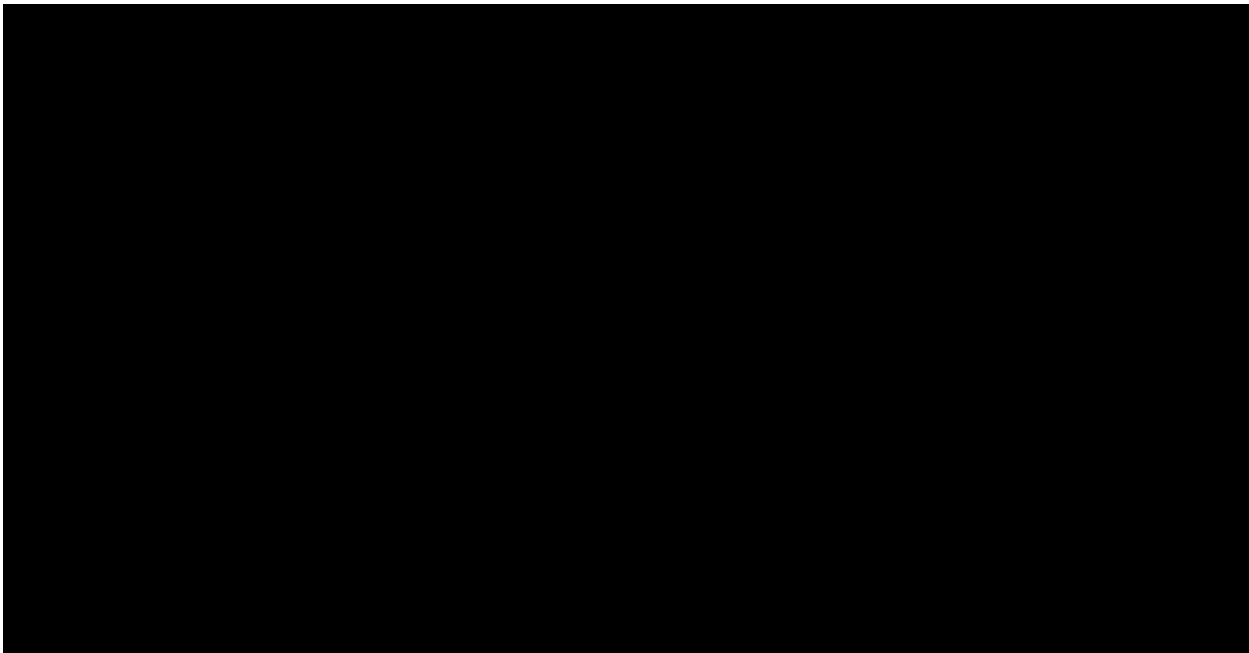


Figure 3-3: Combined Land Use Plan (Source: Draft Aerotropolis Precinct Plans – Figure 30)

3.4 Open Space

The Draft Aerotropolis Precinct Plan identifies the subject site to contain open space land as shown in Figure 3-4 below. This land is not zoned Environment and Recreation under the *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020*, nor is the property identified for public acquisition for the purpose of open space.

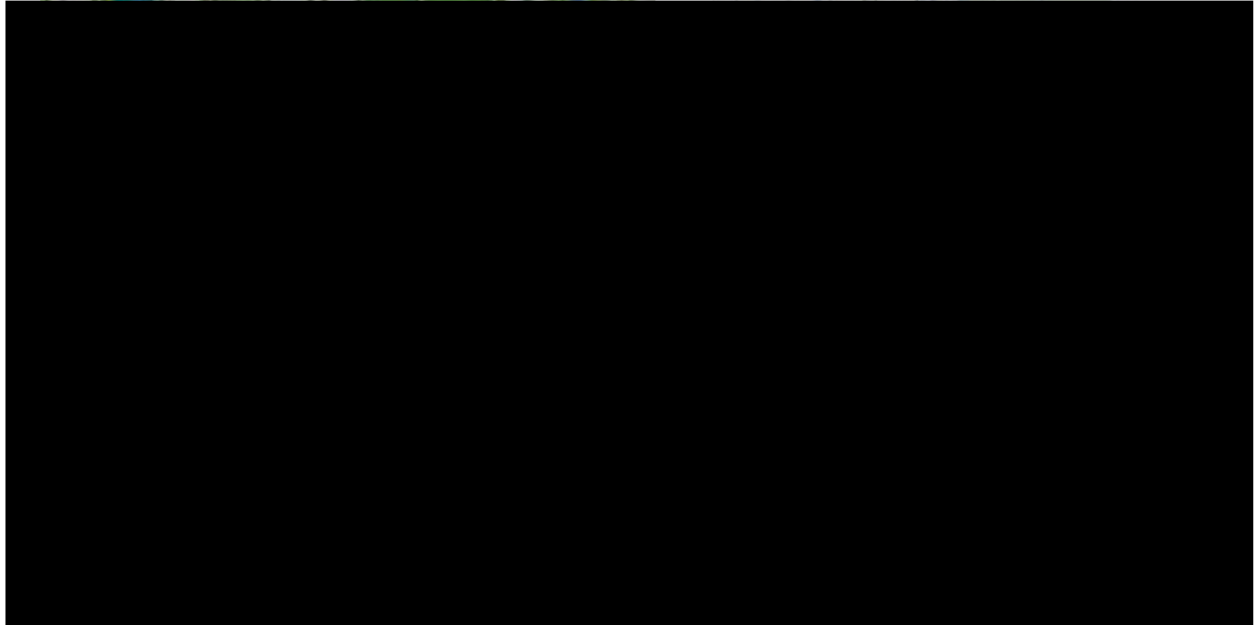


Figure 3-4: Open Space Network (Source: Draft Aerotropolis Precinct Plans – Figure 15)

It is requested that should the public authority intend to acquire the open space as public land, the land should be reserved for public open space acquisition. Alternatively, should the public authority not seek to acquire the open space, the land shown as open space should be included in the site area for calculation for floor space ratio.

3.5 Conceptual Urban Arrangement

Conceptual Urban Arrangement West of Badgerys Creek Road (Figure 46) contained in the Draft Aerotropolis Precinct Plan identifies the edge of development for Thompsons Creek to be between 45 Badgerys Creek Road parallel to the line of the creek and the northern boundary of 25 Badgerys Creek Road.

It is requested that Figure 46 is amended to show the edge of development to be parallel to the line of the creek rather than the northern boundary of 45 Badgerys Creek Road to enable a larger developable area as shown in red below.

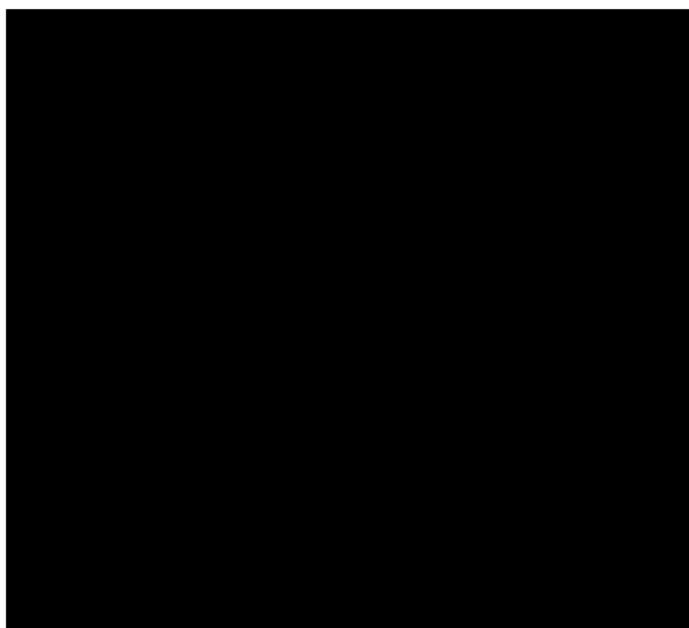


Figure 3-5: Conceptual Urban Arrangement West of Badgerys Creek Road (Source: Draft Aerotropolis Precinct Plans – Figure 46)

3.6 Site Amalgamation

The Draft Aerotropolis Precinct Plan advises that amalgamation of land is required to a minimum of 5 hectares in area to support the development of efficient mixed-use development. The subject three properties have an approximate area of 8 hectares, whilst the wider development parcel consisting of 10 sites has an approximate total area of 16 hectares. The development of the 8-hectare site should be permitted and not held with the remaining properties to make 16 hectares

It is requested that an incentivised control for maximum building height and floor space ratio is introduced on the basis of site amalgamation. Incentivised floor space ratio and maximum building height controls are common around Metro Stations. The incentivised control would permit increased floor space ratios and maximum building heights upon site amalgamation and master planned development, to encourage orderly and co-ordinated development. It is recommended that an incentivised clause should be implemented for amalgamated development sites surrounding the Western Sydney Aerotropolis Metro station

3.7 Height and Built Form Framework

Two varying height controls have been identified for the subject site. The Draft Aerotropolis Precinct Plan identifies a maximum building height of 40-52.5m for the subject properties whilst the Overview of the Precinct Plans identifies a maximum building height of 15-46.5m. The Height and Built Form Framework specifies that height controls are dependent on a range of factors including “promoting the densest and tallest form within the mixed-use centre of the Aerotropolis Core” and “providing for the urban density adjacent to the amenity of parks and Wianamatta corridor”. The intention of the height control within the Draft Aerotropolis Precinct Plan is to “apply the greatest height and urban density in the Aerotropolis Core the Metro station”. However, this urban density has not been promoted adjacent to the creek corridor with regard to the subject sites. The table applying to the building heights in the Core references 55-70m which should be applied to the subject sites.

Due to the positioning of the subject sites within the Aerotropolis Core, in proximity to a metro station and adjacent to the Creek, it is requested that a building height of 55-70m should be applied for the subject sites.

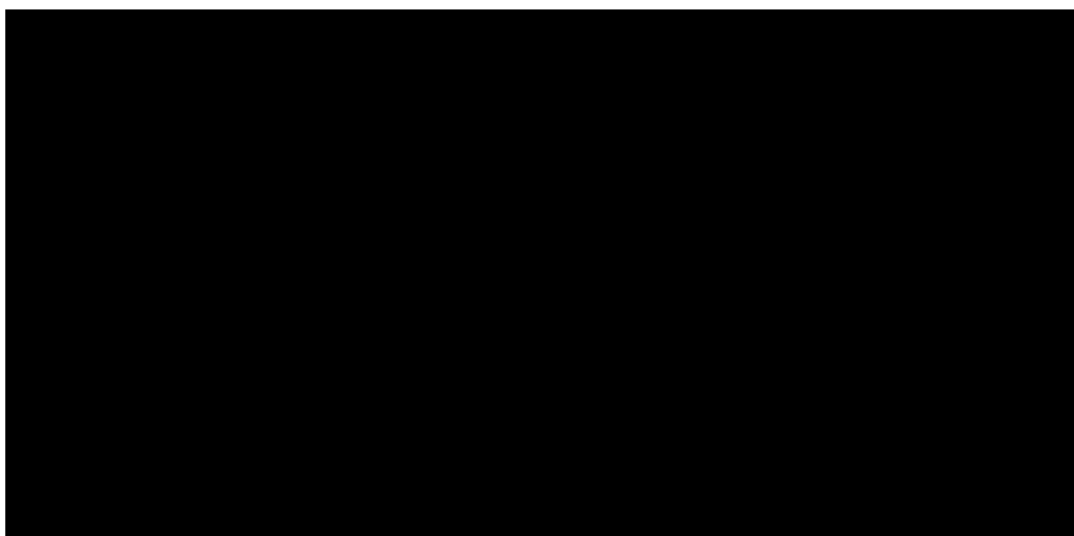


Figure 3-6: Height and Built Form Framework (Source: Draft Aerotropolis Precinct Plans)

			Aerotropolis	Badgerys Creek	Northern Gateway	Agribusiness
			Maximum Height (metres above ground level)	Maximum Height (metres above ground level)	Maximum Height (metres above ground level)	Maximum Height (metres above ground level)
Mixed Use	Centre - Metropolitan	Core	55 - 70	-	-	-
		Frame (area that supports the core)	40 - 52.5	-	-	-
	Centre - Specialised	Core	-	-	30 - 45	-
		Frame (area that supports the core)	-	-	20 - 27	-
Enterprise / Agribusiness	Luddenham Village		-	-	-	Existing height controls
	Centre - Local		24	24	20-27	10 - 20
	Centre - Local Employment		24	24	20-27	10 - 20
	Enterprise / General Employment		24	24	20	10 - 20

Figure 3-7: Maximum Height of Buildings Table (Source: Draft Aerotropolis Precinct Plans – Table 3) Page 7 of 8

4 RECOMMENDATIONS

The recommendations of this submission are based on consideration that:

- The subject sites are within the 800-metre walking catchment of the Aerotropolis Core Metro Station, where higher densities and building heights should be encouraged in accordance with the principles in the exhibited material.
- The subject properties are along Badgerys Creek Road, which is a gateway entrance to the Aerotropolis Core where development should be incentivised.
- There is intention to amalgamate the properties in order to co-ordinate and masterplan orderly development.

This submission recommends that the building height controls, and floor space ratio contained in the Draft Aerotropolis Precinct Plan for the subject properties being [REDACTED] and [REDACTED], [REDACTED] Badgerys Creek Road and [REDACTED] The Northern Road are increased to reflect the following:

1. **A Maximum Building Height of 55-70 metres for [REDACTED] Badgerys Creek Road and [REDACTED] The Northern Road.**
2. **A Floor Space Ratio of 3-3.5:1 for [REDACTED] Badgerys Creek Road and [REDACTED] The Northern Road.**
3. **An incentivised maximum building height and floor space ratio control on the basis of site amalgamation.**
4. **The open space area shown on [REDACTED] Badgerys Creek Road should be identified to be acquired for public purposes.**
5. **Alternatively, if the land is not to be acquired, the open space area should be used in the calculation of site area for the floor space ratio.**
6. **The boundary of the open space land should be aligned parallel to the creek and not to reduce the developable area of [REDACTED] Badgerys Creek Road.**

It is requested that the Department of Planning, Industry and Environment take on board the comments and recommendations discussed in this letter.

To further discuss this submission, please contact Peter Lee on [REDACTED]

Yours Sincerely,

Calibre Professional Services Pty Ltd



Peter Lee
Planning Leader