



**SUBMISSION TO
WESTERN SYDNEY
AEROTROPOLIS DRAFT
PRECINCT PLANS**

gray&walsh



17 March 2021

Mr. Andrew Jackson
Western Sydney Planning Partnership
PO Box 257
Parramatta NSW 2124

Dear Andrew,

SUBMISSION TO THE WESTERN SYDNEY AEROTROPOLIS DRAFT PRECINCT PLANS

OVERVIEW

This submission has been prepared by Gray & Walsh Pty Ltd the development managers of the planned Western Sydney Airport Business Park in consultation with our consultant Urbis Pty Ltd (**Urbis**), and Reid Campbell Architects in response to the public exhibition of the Western Sydney Aerotropolis draft Precinct Plans (**draft Precinct Plans**).

We have an interest in a landholding of approximately 67.2 hectares located at 2420 to 2430 The Northern Road and 140 Adams Road, Luddenham (**the site**). The site benefits from over 1.1 kilometre (km) of frontage of the soon to be completed The Northern Road. The property enjoys a strategic location between Elizabeth Drive, Adams Road, The Northern Road, and the Western Sydney International (Nancy-Bird Walton) Airport (**WSA**).

We thank you for the opportunity to make a submission and provide feedback on the draft Precinct Plans with a specific focus of the draft Agribusiness Precinct Plan.

The draft Precinct Plans seek to build on the vision and objectives for the Aerotropolis outlined within the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan Stage 1 – Initial Precincts (**LUIIP**) and the gazetted State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (**Aerotropolis SEPP**) and recognises the significant economic potential for Western Sydney however we consider that a number of the provisions are in conflict with the Aerotropolis SEPP or that there are matters such as a transparent acquisition provision missing from the draft Precinct Plans that must be addressed prior to finalisation.

We strongly support the continued nomination of the Agribusiness Precinct as a key initial precinct with significant potential to deliver employment as well as services that would support the WSA and serve Greater Sydney's distribution, trade, freight, and logistics needs. We encourage the Department of Planning Infrastructure and Environment (**DPIE**) to work with land owners and key stakeholder to develop a clear process for the successful development of land within the Aerotropolis Precinct, to ensure positive outcomes and clarity of the key roles and responsibilities for each party in the building of the Western City.

1. THE SITE

The Western Sydney Airport Business Park is a major landholding located at 2420 to 2430 The Northern Road and 140 Adams Road, Luddenham (**the site**). It is legally described as Lots 3 to 7 in DP 1240511. The location of the site is shown below in **Figure 1**.

The 67.2-hectare landholding has over 1.1km frontage to the new alignment of The Northern Road and has the benefit of a right of way to Adams Road. The site is located approximately 560 metres to the north-west of the future WSA within the Agribusiness Precinct, initially identified within the LUIIP and the exhibited draft Precinct Plans.

The site is one of the largest landholdings within the Agribusiness Precinct. It is generally clear due to a history of grazing land uses and is currently occupied by a number of rural residential dwellings. The site is traversed by a contained catchment at the upper reaches of a tributary of Cosgroves Creek in the southern portion of the site. These attributes of the land and its physical location provide opportunity for the area to be accessed and serviced in an efficient staged manner that is in line with the draft Precinct Plan envisioned 'Blue-Green-Grid' to ensure that a meaningful open space network is provided within the Aerotropolis.



[Figure 1 – Site location within Agribusiness Precinct]

2. STRATEGIC PLANNING CONTEXT

Historically the site has been identified as future employment land or urban land and the context of the site is summarised as follows:

- Under State Environmental Planning Policy (Western Sydney Employment Area) 2009 (**WSEA SEPP**), the site was identified for the purposes of “providing for development including major warehousing, distribution, freight transport, industrial, and high technology and research facilities.”
- In 2013, the NSW Government and the then Department of Planning & Infrastructure prepared a draft Structure Plan and vision for the Broader Western Sydney Employment Area (**WSEA**). The main employment sectors identified for WSEA in the short to medium term were transport, logistics and warehousing with opportunities for higher density employment, such as business parks, in the longer term. The site is located within WSEA and identified as ‘employment land’.
- The Greater Sydney Regional Plan (A Metropolis for Three Cities) identifies a Metropolitan Rural Area within Greater Sydney with the intent to provide certainty and protection to agricultural industries by preventing inappropriately dispersed urban activities in rural areas. The site is not identified as being within the Metropolitan Rural Area.
- The Western Sydney District Plan sets out the planning priorities and actions for Western Sydney. The site is included in the area identified as ‘Land Release Area’ and ‘Potential Future Industrial/Employment Land.’ The site is located within the western economic corridor, which has the intent to facilitate “job growth leveraging the investment in infrastructure and new communities”.

The strategic importance of the site has been recognised in the Aerotropolis SEPP and this is reflected in the draft Precinct Plans and the targeted early release of this land for development intended to support the successful operation of the WSA.

3. WESTERN SYDNEY AIRPORT BUSINESS PARK

Adjoining the WSA and benefiting from over 1.1 km of frontage to the soon to be completed The Northern Road, Western Sydney Airport Business Park (www.westernsydneyairportbusinesspark.com.au) is strategically located between Elizabeth Drive, Adams Road and The Northern Road..

The Western Sydney Airport Business Park is managed by the Development Management team who are delivering the largest employment area within the Sydney’s North West Growth Area, the \$2.9 billion Sydney Business Park (www.sydneybusinesspark.com.au).

Our team is preparing structure and precinct planning layouts to accommodate proposed uses including Business Premises, Distribution Centres, Food and Drink Premises, Freight and Logistics, Light Industry, and Warehousing as permitted in the Agribusiness zone . Our aim is to build a world class business park that will attract the very best businesses from around the globe and will incorporate superior telecommunications and infrastructure provision, high quality landscaping, a range of amenities and integrated green technology.

We are already in discussions with a number of tenants regarding their property requirements and desire to locate within the Western Sydney Airport Business Park to support and grow with the Western Sydney Airport opening. The preliminary concept plans for the future development of the site are included in **Appendix A** and **Appendix B** of this submission.

4. SUBMISSION ON DRAFT PRECINCT PLANS

Western Sydney Airport Business Park welcomes the opportunity to comment and participate in the development of the draft Precinct Plans. We acknowledge the Western Sydney Planning Partnership (**Planning Partnership**) for the considerable amount of work involved in developing the long-awaited strategic planning framework for the Aerotropolis.

Good planning leads to positive outcomes for all stakeholders. We strongly support the connection to Country as a driver for planning and urban design and the subsequent landscape led approach to precinct planning.

While we support the broad strategic vision set out within the draft Precinct Plans, we believe that the over-complex, prescriptive and fine-grained nature of the draft Precinct Plans could present a barrier for efficient site planning and development design once further detail is known. This has certainly been our experience when seeking to develop land subsequent to precinct planning exercises where local roads have been zoned for infrastructure purposes under the environmental planning instrument or the location is mandated in a precinct plan.

The draft Precinct Plans need to provide clear guidance for the development of the Aerotropolis going forward and clear pathways of development to be achieved. It is vital that the planning framework is clear, flexible and supported by strong evidence. Now is the time to set a framework that ensures the best outcomes for future development within all precincts.

We have reviewed the package and have identified a number of key matters which we support together with matters which we consider should be addressed prior to finalising the draft Precinct Plans. The identified refinements to the draft Precinct Plans in the vicinity of the site are consistent with the overall intent and structure of the draft Precinct Plans and reflect the planning outcomes sought to be achieved. This has been done to ensure that changes to the detail do not adversely impact on the delivery of the Agribusiness Precinct and to enable the development potential of the site to be achieved consistent with the strategic objectives of the Agribusiness Precinct.

4.1. SUPPORT FOR THE PRECINCT PLANS

As stated above we support the broad strategic vision set out within the draft Precinct Plans. In summary we support the overall strategic direction in relation to:

- The staging for the release of land in the Agribusiness Precinct (as shown in **Figure 1**) and confirm that we are ready to commence development of the site as detailed in our submission of February 2020;
- Future development controls as they relate to building heights and the overall layout of development within the precinct;
- The sub-arterial road network layout which will provide strategic transport connections necessary for the success of the precinct however as noted below further design development is required at this stage; and
- The proposed hierarchy of centres.



[Figure 2 – Landholding and staging plan.]

4.2. GROUND TRUTHING THE PRECINCT PLAN

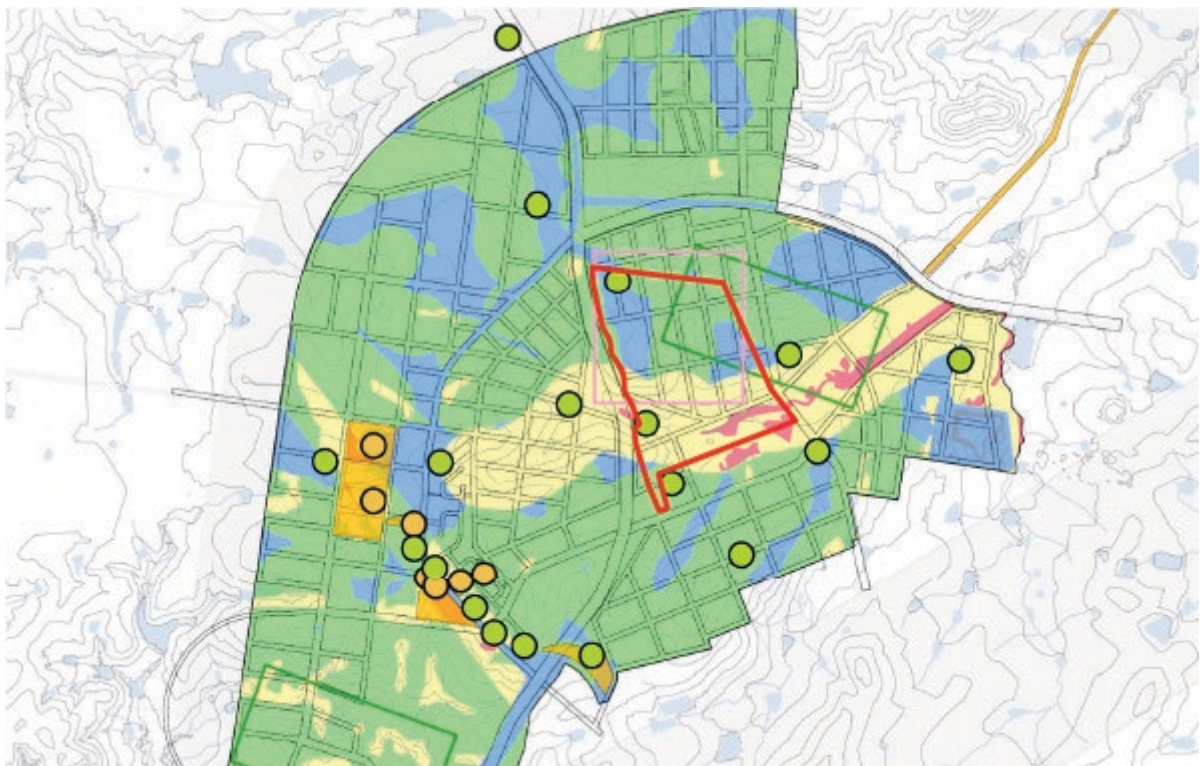
Ground truthed, evidence-based planning is the cornerstone of what we do to achieve quality outcomes. Using evidence in setting planning policy promotes informed decision-making and supports the achievement of significant, sustainable change. The evidence base that underpins the precinct planning process should be accessible to all with the ability to question and challenge certain assumptions and findings where necessary.

To ensure accuracy within the draft Precinct Plan and certainty for future development we would request that:

- Detailed Water Cycle and Flood Risk Impact Assessments are completed and exhibited. We understand that the previous exhibited documents indicated that the Environment and Recreation zone across the Aerotropolis has been informed by the 1:100 flood planning level which has not yet been defined within an up to date flood study. It is important that ground truthing of all waterways informs the classification of waterways and any requirement to retain waterways Strahler Order 2 and higher in their natural state is consistent with the NRAR definition of a 'river'.
- Cadastre boundaries are accurately considered and presented in the draft Precinct Plan and supporting studies. Understanding and accounting for land ownership is an essential component

of good planning and is a relevant factor when considering proposals for lot amalgamation and future local road network and connections to avoid inefficient development patterns.

- We support the objectives of the draft Precinct Plan to enable retention of non-Aboriginal heritage items and recognise the rich cultural heritage of Western Sydney and support the celebration of heritage in Luddenham Village. However, the nomination of unlisted Heritage Items and identification of items that no longer retain the inherent heritage significance when the item was listed should be removed from the Precinct Plan item listing. We submit that the identification of unlisted items introduces an unnecessary constraint on orderly development of land and without required evidence base to support such nomination undermines the conservation objectives sought to be implemented. Further, we consider that items 219 and 220 no longer retain or reflect the heritage significance relevant when first listed. A review of the two items confirms that there is little original fabric remaining in the old Hall and farmstead. This can be confirmed through site specific reviews and the outcomes of such reviews should be reflected in the final Precinct Plan in order to avoid the unnecessary sterilisation of land associated with the item and related buffer areas.



[Figure 3 – Heritage map with site identified and showing the two non-listed heritage items]

4.3 REFINEMENTS TO THE PRECINCT PLAN

Whilst we understand the intention for planning for the Aerotropolis to adopt a 'beyond business as usual' approach this should be developed to fit around rather than in addition to existing and well understood statutory frameworks and processes under the EP&A and other related Acts. It is appropriate for the Precinct Plan to identify opportunities for the coordination of land use, infrastructure and transport infrastructure and an approach to enable the integration of infrastructure corridors

especially given the scale of greenfield areas. The Precinct Plan when finalised will be the first stage precinct plan and will set the bench mark for future precinct plans.

In a planning context a precinct plan should be a high-level plan that defines a vision, strategic directions and guidelines that can be reflected in future detailed masterplans and development applications to facilitate the effective, sustainable and ongoing management of development and delivery of infrastructure.

If a precinct plan is too detailed or fine grained in terms of establishment of allotment consolidation, local road networks and connections it can stifle innovation and constrain future development that would normally be explored in the preparation of masterplans for development areas with thin the Agribusiness Precinct clause 41 of SEPP Aerotropolis directs that:

Development consent must not be granted to development on land to which a precinct plan applies unless the consent authority is satisfied that the development is consistent with the precinct plan.

No objection is taken to this control, however if the precinct plan is overly prescriptive in its terms this will prevent development consent being granted to innovative projects that have been developed examining the opportunities of a site at a micro level. To avoid potential conflict between precinct plans and development proposals, while still delivering the overall objectives of the Aerotropolis SEPP and the Precinct Plan we suggest that the following refinements be made:

- Make provision for additional intersections to facilitate multi directional movements, and ensure that they are well located, generally 1km apart along Elizabeth Drive, in accordance with standard TfNSW design standards. This could include:
 - the provision of signalised intersection for the new sub-arterial road that runs parallel Northern Road connects across the Agribusiness precinct from Adams Road north across Cosgrove Creek and Elizabeth Drive; and
 - the provision of a four-way signalised intersection at the corner of Elizabeth Drive, Luddenham Road and the new Road on the northern side of Cosgroves Creek; and
 - add an additional left in left out on The Northern Road between Elizabeth Drive and Adams Road.
- We support the draft Precincts Plan in terms of the maximum 350m x 350m (approximately 12 hectares) subdivision block sizes. This control should be applied to the Anton Road area and that the local low order Industrial Roads as nominated in the draft Precinct Plan be removed. The nomination of the Industrial Roads will result in the subdivision of land on a grid of 115m x 25m - approximately 2.5hectare which is around 15% of the size of the target block size. This will decrease the opportunity to deliver a diversity of product and result in a poor urban design and planning outcomes for the precinct and reduce the flexibility of product within the zone. In the circumstances where there not a nominated centre or hub in this location the larger road pattern should be retained, and the more detailed layouts be developed as part of the future master planning. Consequently, the larger road pattern suggested by our draft masterplans should apply. We have prepared Figures 4 and 5 below to demonstrate how the road network can be developed without the fine-grain estate or Industrial Roads being set.



[Figure 4 - Existing Structure Plan]



[Figure 5 – Recommended Structure Plan without fine grain road layout]

CONCLUSION

In conclusion we summarise below the outcomes we are seeking from this submission and further consultation with the Planning Partnership and DPIE

1. We support the identification of the Agribusiness Precinct as one of the six initial precincts identified of the 10 precincts in the Aerotropolis. The planning and delivery of the future development of the site within the Agribusiness Precinct is a significant opportunity given its location along the Northern Road upgrade, connectivity to Elizabeth Drive and Adams Road, proximity to WSA and the complementary land uses which will promote economic activity.
2. Western Sydney Airport Business Park supports the governments commitments to early infrastructure provision including roads. Indeed, the site enjoys the largest frontage to The Northern Road in the Agribusiness Precinct. There is further opportunity to enhance accessibility by adopting additional intersections to facilitate multi directional movements, and ensure that they are well located, generally 1km apart along Elizabeth Drive, in accordance with standard TfNSW design standards. This could include:
 - the provision of signalised intersection for the new sub-arterial road that runs parallel Northern Road connects across the Agribusiness precinct from Adams Road north across Cosgrove Creek and Elizabeth Drive; and

- the provision of a four-way signalised intersection at the corner of Elizabeth Drive, Luddenham Road and the new Road on the northern side of Cosgroves Creek; and
 - add an additional left in left out on The Northern Road between Elizabeth Drive and Adams Road.
3. We request the rationalisation of the proposed road network currently shown on the precinct plans. We are currently delivering major existing employment centres and note that having many pre-planned local and zoned roads reduces flexibility and creates conflict once more detailed site-specific planning and constraint identification is undertaken. Further work needs to be undertaken to ensure that key regional connections are delivered and opportunities to deliver the fine grain design in future master plans and development proposals.
 4. Preparation of detailed Water Cycle and Flood Risk Impact Assessments and Heritage Assessments to ensure the land is not unnecessarily inhibited by desk top studies.
 5. Greater clarity on the proposed framework for the delivery of infrastructure and open space networks and acquisitions mechanisms.

We look forward to further consultation on the draft Precinct Plan and other processed strategies in the planning framework. If you have any questions, please do not hesitate to contact Owen Walsh on 0413 442 096 or owen.walsh@g-w.com.au or Clare Brown, Director of Urbis at cbrown@urbis.com.au.

Yours sincerely,



Owen Walsh
Director, Gray & Walsh



Clare Brown
Director, Urbis

APPENDIX A

PRELIMINARY CONCEPT MASTER PLAN

western sydney airport business park



APPENDIX B

ARTIST'S IMPRESSION OF THE WESTERN SYDNEY AIRPORT BUSINESS PARK

