

12th March 2021

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Online submission

cc. Peter Achterstraat AM: productivityfeedback@treasury.nsw.gov.au

cc. Alex O'Mara, Group Deputy Secretary, DPIE

cc. Marcus Ray, Group Deputy Secretary, DPIE

Dear Mr Betts

Re: draft Aerotropolis Precinct Plan

I write regarding the draft Aerotropolis Precinct Plan (draft Precinct Plan) proposed by the Department of Planning, Industry and Environment (the Department).

The Urban Taskforce acknowledges the need for the Aerotropolis precincts to be properly planned so as to deliver on the vision of being “Australia's next global gateway” over the next twenty years.

The Urban Taskforce supported the broadly flexible planning framework provided by the Aerotropolis SEPP. The SEPP's zoning framework reflects the need for a 20 year plan that delivers a new city. By being less restrictive and ‘open’ the SEPP's zoning framework can facilitate development responses to changing global and local economic, social and environmental conditions and the subsequent changes to market and consumer preferences. However, where the Aerotropolis SEPP succeeds – the draft Precinct Plan fails.

The draft Precinct Plan is **not supported**. The draft Aerotropolis Precinct plan is over-regulated, with an excessive number of planning requirements that are likely to stifle development and investment, at least for the short to medium term, in many of the Aerotropolis precincts.

The Urban Taskforce **recommends** that the draft Precinct Plan is comprehensively revised and refined with a focus on broad objectives and outcomes as opposed to prescriptive planning requirements. A more outcome focussed document would allow the flexibility needed by industry and communities to accommodate any major economic shocks or changes to circumstance, (A global pandemic that all but puts a halt to international air travel – for example.)

Of serious concern is the requirement for any development application inconsistent with the draft Precinct Plan requiring a Planning Proposal. Given the 270 detailed and overly prescriptive planning requirements, this will result in a considerable amount of

planning proposals going before the Secretary of Planning further clogging an already slow approvals system in NSW.

Urban Taskforce draw's DPIE's attention to the NSW Productivity Commission's *Green Paper- continuing the Productivity Conversation*. The Productivity Commission's paper identifies the NSW Planning System as being "overly complex, prescriptive and slow". The report's recommendations include "Cut NSW planning assessment gap - Continue to implement measures to reduce red tape and complexity in the planning system. Bring NSW approval assessment times into line with other jurisdictions' times by the end of 2023".

The draft Precinct Plan represents the kind of overly prescriptive and complex plan the Productivity Commission identifies as needing to change. The draft Precinct Plan is overly prescriptive by containing pages and pages that proponents need to address in designing buildings and preparing DAs and masterplans. The same pages and pages are then required to be considered by planners in assessing the DAs and masterplans. This extends assessment times and adds to the costs of delivery of both the actual development and the approval.

The Urban Taskforce **recommends** DPIE reviews the draft Precinct Plan in the context of the NSW Productivity Commission's Green Paper with a view to the final plan being a responsive and flexible, fit for purpose, long term document to guide the preparation and assessment of master plans and development applications.

The Urban Taskforce is always willing to work closely with the Government to assist in delivering on the vision for the Aerotropolis.

Table 1 includes a summary of Urban Taskforce recommendations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending to the right.

Tom Forrest
Chief Executive Officer

Table 1:
Summary of Urban Taskforce recommendations

	Urban Taskforce recommendation
1.	The Urban Taskforce recommends that the draft Precinct Plan is comprehensively revised and refined with a focus on broad objectives and outcomes as opposed to prescriptive planning requirements.
2.	The Urban Taskforce recommends DPIE reviews the draft Precinct Plan in the context of the NSW Productivity Commission's Green Paper with a view to the final plan being a responsive and flexible, fit for purpose, long term document to guide the preparation and assessment of master plans and development applications.