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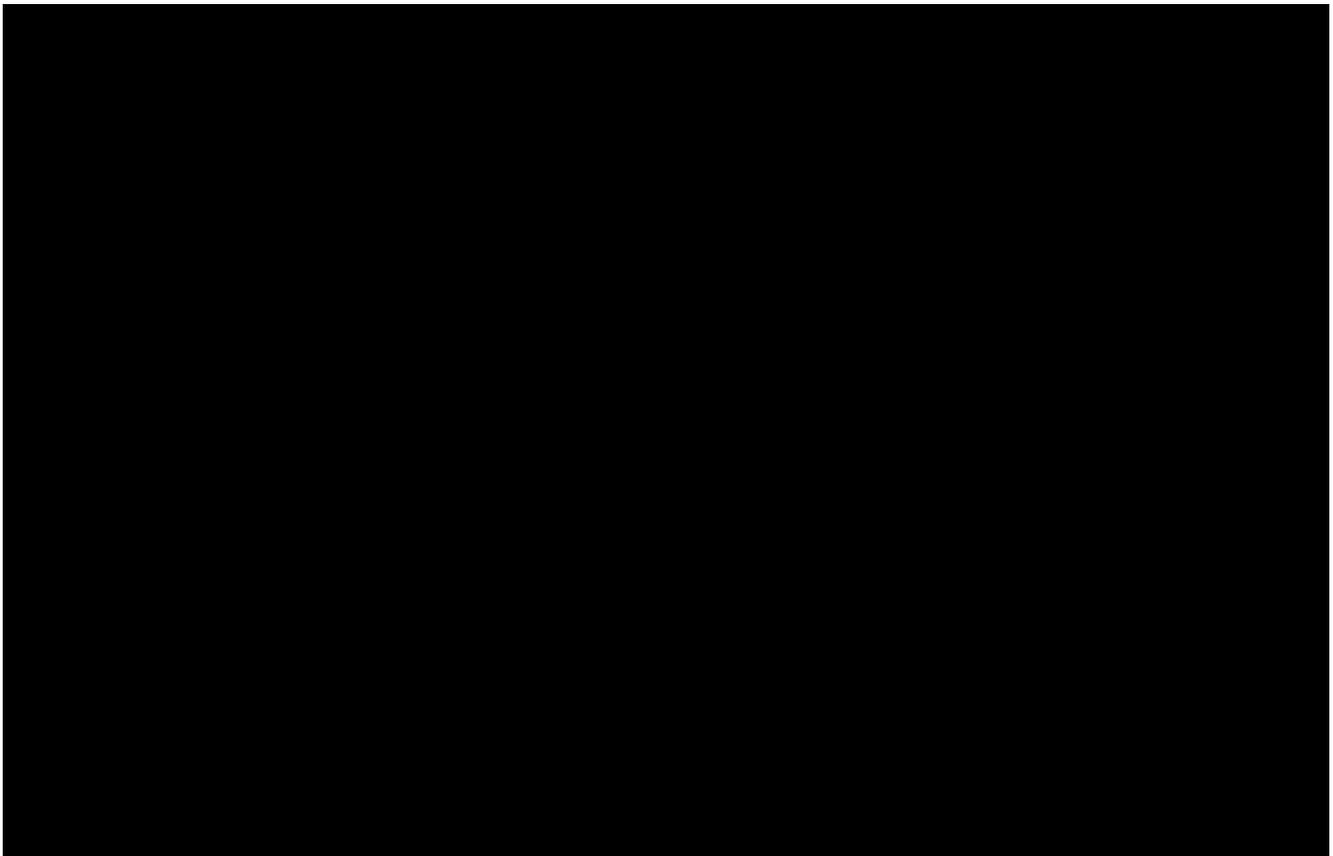
12 March 2021

Attention: Anthony Pizzolato
Manager, Aerotropolis / Planning Partnership

Dear Anthony

Submission on draft Western Sydney Aerotropolis Precinct Plans

Downer EDI Works Pty Ltd (Downer) owns [REDACTED] Martin Road in Badgerys Creek (the site). The approximately 24 hectare (ha) site falls within two priority precincts of the Western Sydney Aerotropolis. The western third of the site falls within the Badgerys Creek Precinct while the eastern two-thirds of the site falls within the Wianamatta-South Creek Precinct. South Creek forms the sites eastern boundary (refer to figure below).



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The western third of the site within the Badgerys Creek Precinct is zoned Enterprise while the eastern two-thirds of the site within the Wianamatta-South Creek Precinct is zoned Environment and Recreation (refer to figure below). Approximately 7.5 ha of the site is within the Enterprise Zone and therefore only approximately 30% of the site can be developed



Downer is in the process of preparing a State Significant Development (SSD) application for our proposed Circular Economy Hub at [REDACTED] Martin Road, Badgerys Creek. Downer has reviewed the Draft Aerotropolis Precinct Plan and has met with you on 5 March 2021 to discuss the implications for development of [REDACTED] Martin Road.

Downer would like the following matters to be considered in the finalisation of the Aerotropolis Precinct Plan.

1. Figure 22 in the Draft Aerotropolis Precinct Plan proposes a 25m wide local collector road along the eastern edge of the Enterprise Zone within the Badgerys Creek Precinct. This local collector road is set back from the eastern edge of the Enterprise Zone and takes up a significant area of the remaining part of the site that is able to be developed. There is also an industrial street proposed along the same alignment of the existing Martin Road which forms the current western boundary of the site. To avoid further sterilization of the remaining approximately 30% of the site that falls within the Enterprise Zone and can be developed for industrial purposes, Downer requests

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- that this local collector road is relocated to an alternative position. A more suitable location could be along the existing Martin Road alignment along the western boundary of the site.
2. Figure 30 presents indicative employment zone centre locations within the Enterprise Zone. It states that these locations are indicative and may be re-accommodated subject to further detailed justification. Similar to the above submission, as there is only approximately 30% of the site within the Enterprise Zone and therefore able to be developed for industrial purposes, relocation of this proposed employment zone centre to an alternative location outside the site would be preferred. There are a number of properties within the Badgerys Creek Precinct and Enterprise Zone that are not impacted so significantly by flooding and where a much larger percentage of the site is able to be developed. It is requested that the relocation of the proposed employment zone centre to one of these properties is considered.
 3. Figure 66 - Sequencing Plan in the Draft Aerotropolis Precinct Plan identifies the site to be within a second priority area. In the meeting with WSPP we were advised that development in line with the ultimate and higher order desirable land uses in the second priority areas is likely to occur in about 15 years and that enabling works would likely be allowed in the Enterprise Zone for about 15 years. As there will be a significant amount of development in the Aerotropolis after the first 15 years, there will be a high demand for enabling works post 15 years. Therefore, Downer requests that consideration is given by WSPP when providing comment on development applications for enabling works, that these should be permitted for a longer period than 15 years.
 4. Section 5.1.8 of the Western Sydney Aerotropolis Phase 1 Development Control Plan (DCP) outlines performance outcomes to ensure new or upgraded Waste or Resource Management Facilities deliver best practice environmental performance controls. 'Enabling works' that are developed around a circular economy model are likely to include the use of waste (processed off-site) or will process waste on-site as a raw material in manufacturing products eg in asphalt production. This is important to meet the objectives of the Draft Aerotropolis Precinct Plan around circular economy. If these enabling works are likely to need to transition to a higher order land use within about 15 years, it is particularly onerous to require them to comply with performance outcomes PO1 and PO2 in particular, as these requirements would result in a significant additional capital cost, that is unlikely to be recovered over the time period in which enabling works will be allowed at the site. However, through the SSD process and preparing the Environmental Impact Statement and associated technical studies, the development would need to demonstrate that it wouldn't have any significant impacts on sensitive receivers and neighbouring landowners and would apply all reasonable and feasible environmental controls. Therefore, Downer requests that in developing the Phase 2 DCP and finalising the Aerotropolis Precinct Plan that consideration be given to providing more flexibility for enabling works that adopt circular economy initiatives including waste processing and resource recovery, to be

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able to demonstrate that they can adopt reasonable and feasible environmental controls/management measures and not have significant impacts on sensitive receivers and neighbouring landowners without strictly applying performance outcomes in PO1 and PO2 of Section 5.1.8 of the Phase 1 DCP.

Thank you for the opportunity to provide comments on the Draft Aerotropolis Precinct Plan and we look forward to working with you in preparing our SSD application for our proposed Circular Economy Hub.

Kind Regards,

Jim Appleby
General Manager – Reconomy
Downer EDI Works Pty Ltd
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Email: [REDACTED]