

## **Draft Aerotropolis Special Infrastructure Contribution - Liverpool City Council** **Submission**

A key to success of infrastructure provision is the continued collaboration of State agencies and Local Government. Council are appreciative of the collaborative approach taken by NSW DPIE in their efforts to prepare the SIC and look forward to continuing this relationship as we seek to finalise the SIC and the local infrastructure contribution plan.

In response to the exhibition of the Aerotropolis Special Infrastructure Contribution, Liverpool City Council provides the following submission.

### **A. Need for increased certainty around land acquisition**

One of the key outstanding issues in relation to the delivery of infrastructure within the Aerotropolis is land acquisition. The Aerotropolis SEPP includes land reservation for a relatively small amount of land surrounding Thompsons Creek.

The infrastructure identified in the draft SIC, as well as Council's draft contributions plan, requires the acquisition of land to enable the delivery of the various infrastructure projects. The lack of an acquisition reservation map in the Aerotropolis SEPP (or viable mechanism to trigger acquisition) provides a great level of uncertainty for when and where these infrastructure items will be delivered. This approach places uncertainty on both the acquisition authority and existing landowners particularly those who may be facing hardship, to initiate the acquisition process.

It is acknowledged that this issue is more related to the Aerotropolis SEPP and Precinct Plans than the SIC, however the SIC will need to account for lands to be acquired by state entities. The inclusion of refined land reservation acquisitions maps will provide a greater level of certainty and transparency around the provision of infrastructure in the Aerotropolis.

#### **Recommendation:**

- 1. Facilitate the development of an acquisition strategy (or the land acquisition reservations map) for the Aerotropolis SEPP.**

### **B. Coordination of infrastructure delivery**

As a package, the Place Infrastructure Compact, SIC and Contributions Plan identify a significant amount of infrastructure to deliver in the Aerotropolis. There is a significant risk of overlap in the roles and responsibilities for delivery of specific items, as well as collocation of particular items between agencies and councils.

It is important that there is a coordinated approach taken to the delivery of infrastructure to minimise disruption to the community and maximise the benefit of each item. Council would like to see a state agency tasked with overseeing the delivery of infrastructure that is administered under state and local plans. This authority could also be used to facilitate land acquisition.

#### **Recommendation:**

- 2. Consider tasking a state agency with oversight and coordination of the delivery of infrastructure across State and Local Government plans.**

## C. Overlapping SICs

The Aerotropolis SIC proposes to overlap land already included under the Western Sydney Growth Areas SIC (WSGASIC). There is also the additional charge for the proposed metro stations within certain areas of the aerotropolis. Supporting documentation identifies that the WSGA SIC will be discounted in these overlapping areas.

This approach of having overlapping SICs, as well as the additional station charge for some land, is likely to be confusing to stakeholders and developers as they look to understand the full impact of infrastructure charges on their development proposals. Land parcels should only be subject to one SIC.

There is concern about the impact on the delivery of infrastructure within the Growth Centre if the related SIC is discounted. Discounting the WSGA SIC will create a shortfall for funding of identified projects within the Growth Centre. While the Aerotropolis is an important precinct, it should not come at the expense of infrastructure within the Growth Centre.

It is suggested that the WSGA SIC will need to be comprehensively reviewed to ensure its consistency with the role of the Aerotropolis and to ensure the infrastructure provided across both precincts aligns.

### Recommendation:

- 3. The Growth Centres SIC is reviewed to remove duplicate charges across land within the Aerotropolis and to ensure complementary work schedules.**

## D. 15th Avenue transport corridor

The SIC includes collection and allocation of funds for transport infrastructure. However, there is a lack of funding for the FAST corridor and related infrastructure to be delivered in accordance with the vision for the corridor. The SIC identifies \$19M to be collected for this project and yet the total project cost is in the vicinity of \$500M.

The FAST project has the ability to provide a fast and sustainable transport connection from the Western Sydney Airport and Aerotropolis to the existing Liverpool city centre. This transport connection could be delivered at less cost compared with other transport modes and be operational ahead of the opening of the airport. Transport for NSW are supportive of this project and it should therefore have greater emphasis in the SIC.

### Recommendation:

- 4. Include additional detail on the 15<sup>th</sup> Avenue upgrade to include reference to FAST initiative and associated cost.**

## E. Alignment of infrastructure schedules

Both the SIC and Council's contributions plan provides for a significant infrastructure. There is the potential for the current work schedules to overlap. As an example, the SIC includes a new community facility and open space while Council's contribution plan includes a similar facility and a range of open space areas.

It's very important that there is a clear differentiation between the local contribution plan and the special infrastructure contribution. It is acknowledged that these matters will continue to be worked through as the Department and council refine these plans.

Council and the Western Sydney Planning Partnership and DPIE have initiated an audit of the infrastructure proposed within the local contribution plan the special infrastructure contribution and the precinct plans. This work is fundamental in ensuring there is alignment both between the infrastructure plans and the strategic plan to facilitate the delivery of projects.

#### Recommendation:

- 5. Continue collaboration between DPIE, PCC and LCC to ensure clear delineation of projects in the respective work schedules.**
- 6. The SIC is not finalised until the comparative analysis is finalised.**

## F. Equity for charge on transport

The SIC proposes a specific charge around the two proposed metro stations as a form of value capture. To ensure the vision of the Aerotropolis is achievable, it is important that jobs locate within close proximity to sustainable transport modes. It is important that the proposed station charge does not create a disincentive to achieving this objective.

#### Recommendation:

- 7. Ensure the proposed station charge does not create a disincentive to achieving the objective of locating jobs within close proximity to sustainable transport modes.**

## G. Additional detail on works schedule

At present the SIC provides basic information for each infrastructure item (basic description and cost). Additional information is needed to assist community and stakeholders in understanding what will be delivered by the SIC. This information, including more detailed description, cost of works and land and location (if known) should be provided to ensure clarity for the community and stakeholders.

#### Recommendation:

- 8. Provide additional information in the SIC in relation to the various infrastructure items in the work schedule**

## H. Funding gaps

Most infrastructure items included in the SIC have a cost apportioned to future development that is well below the 100% attributed cost. This apparent funding gap, and the lack of clarity on how this gap will be funded, raises concerns on the ability to deliver the infrastructure items. It is important that these structural infrastructure elements have a clear path to delivery as timely provision of infrastructure will have a direct impact on the success of the Aerotropolis.

Secure funding sources for these infrastructure items will provide a greater level of confidence in the ability of governments to achieve the vision for the Aerotropolis and the broader Western Parkland City.

#### Recommendation:

- 9. Identify funding sources for the full cost of items.**

## I. SIC and development assessment

It is important that the necessary infrastructure plans are finalised to ensure development applications are able to be approved. At present, a DA cannot be approved in the Aerotropolis initial precincts if a contributions plan is not in place.

### Recommendation:

- 10. Ensure the SIC commences prior to, or alongside, the local contributions plan.**

## J. Cumberland Plain Conservation

Council's draft local infrastructure contributions plan does not include any environmental rehabilitation works. However, the SIC Plan only appears to cover biodiversity offsets associated with the Cumberland Plain Conservation Plan (CPCP). Given the draft status of the CPCP, and inbuilt flexibility of what the offset package would comprise of, there is little certainty regarding which actions would be funded by the SIC.

It is likely that a large portion of the funds will be spent on offset measures in areas outside of the aerotropolis boundary. Some works may be included under the 'green infrastructure' category of the SIC, but this is ambiguous.

### Recommendation:

- 11. Provide Council with a clear indication of what the SIC would cover, and any likely gaps in funding for the management of natural assets.**

## K. Timing of environmental works

The SIC notes that the contribution towards biodiversity offset works associated with the CPCP would not be required until the CPCP is adopted and land has been biocertified. At this stage, the timing of this is an uncertainty, introducing a risk that this contribution would not be in place in a timely matter. It is important that greater certainty in timeframes for this aspect are provided.

### Recommendation:

- 12. Finalise the CPCP prior to finalising the precinct planning process.**

## L. Relationship between PIC and SIC

The Greater Sydney Commission prepared the Place Infrastructure Compact to align growth and infrastructure investment. This appears to be a key document in the preparation of the SIC. In a separate submission to the GSC, Council has raised concern about the population projections included in the PIC. Within the Austral, Edmondson Park and Leppington growth areas, the population figures are well below what is expected within the precinct as a result of increased residential dwelling densities or inaccurate assumptions.

The impact of this is the under provision of infrastructure and inappropriate timing on the delivery of infrastructure.

The assumptions relating to future population need to be consistent across the local contributions plan, the precinct plans, the PIC and the SIC.

Recommendation:

- 13. Ensure that there is consistency in assumptions and projections across the various planning and infrastructure documents within the Western Parkland City.**