

Camden Council Submission to the
**Western Sydney
Aerotropolis Plan – 2020**



camden
council



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Executive Summary

With the projected rate of growth in Western Sydney (and the Greater Sydney Region) over the next three decades, there is a heightened need for an integrated, holistic approach to land-use and infrastructure planning. In this regard, Council commends the NSW Government's initiative in preparing the *Western Sydney Aerotropolis Planning Package*.

Camden Council is committed to both the existing community, and the future community that will grow throughout the Camden local government area (LGA) over the next 30 years. The *Western Sydney Aerotropolis Plan (WSAP)* (as well as the Western Sydney Airport project) are anticipated to have significant impacts on our community – this impact warrants a thorough and considered evaluation by both the NSW Government and the Australian Government.

Council has identified a number of key issues and recommendations for the Camden LGA regarding the *WSAP*. Council would welcome the opportunity to engage further with the Department of Planning, Industry & Environment (DPIE) in collaboration with the Camden LGA community, in discussing these issues, to assist in resolving potential issues associated with the *WSAP* project.

Key Messages

To assist DPIE in assessing the following submission, Council's key messages are grouped to align with the issues identified in the *WSAP* report; namely:

1. A vision for the Aerotropolis;
2. Implementing the vision;
3. Infrastructure;
4. Safeguarding the 24-hour airport;
5. Resilience and adaptability;
6. Precinct planning; and
7. Infrastructure funding and provision.

As part of this Executive Summary, following are the key issues identified by Council through a merit-based assessment of DPIE's exhibition material for the proposed *WSAP*. Council explores each of these issues in further detail, in the main section of this submission.



1. A vision for the Aerotropolis

Key Issues for the Camden LGA –

1.1 Western Sydney needs a projected 200,000+ new jobs, across a range of industries/vocations. These jobs must be available both in the Western Sydney Aerotropolis and locally e.g. in the Camden LGA.

1.2 To facilitate the delivery of these jobs and economic prosperity, the Western Parkland City needs an economic development strategy for Western Sydney.

1.3 DPIE must facilitate comprehensive, meaningful engagement with the Camden LGA community, regarding the *WSAP*.

1.4 To achieve the 'sustainable, liveable and connected' vision for the Aerotropolis, compact/walkable precincts must be planned and delivered up-front.

Generations of workers from Western Sydney have been compelled to travel daily to access employment in Eastern Sydney. With the projected growth of the Western Parkland City, current levels of employment opportunities in the west are not sustainable. **Existing/future residents in Western Sydney need access to local jobs e.g. in the Camden LGA.**

Council commends the NSW Government in its preparation of a *WSAP*. With a combined investment of almost \$9billion in infrastructure (\$5.3billion: Western Sydney Airport – Stage 1, and \$3.6billion: Western Sydney Infrastructure Plan), the need for a positive return in any benefit/cost analysis is paramount; particularly when its intent is to underpin the economies of Western Sydney, the broader Sydney Region, NSW and the Australian economies. In this regard, while it is acknowledged the NSW Government recently released its *NSW 2040 Economic Blueprint*, it remains evident that **Western Sydney needs its own economic development strategy**. A Western Sydney economic development strategy prepared by the NSW Government would demonstrate to the Australian Government, the finance sector, the business sector/industry and broader community how this significant infrastructure investment will help drive economic activity in Western Sydney; to help the Western Parkland City prosper at a level like that of Sydney's other two cities (i.e. the Eastern Harbour City and Central River City).

Council encourages DPIE to have an ongoing commitment to work with Council and the community, to ensure that any future *WSAP* planning initiatives are implemented through a collaborative engagement process.

To ensure the Aerotropolis is comprised of compact/walkable precincts, it must be planned and developed as such from the outset. The alternative i.e. initially larger building footprints is less likely to facilitate sustainable planning outcomes in the long-term.



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2. Implementing the vision

Key Issues for the Camden LGA –

2.1 There is a need for integrated strategies (with funding via an amended Special Infrastructure Contribution Levy) between the *WSAP* and the South West Growth Area (SWGA), that will address the transport network strategy and Wianamatta-South Creek catchment.

2.2 The *WSAP*'s first stage should include an integrated approach for Agribusiness with the Camden LGA, as well as location of education facilities in an expanded Aerotropolis Core Precinct, south of Bringelly Road.

2.3 Planning of the Western Sydney Aerotropolis should not be undertaken in isolation of the extensive development happening in the rest of the Western Parkland City - it should include:

- an integrated precinct planning approach;
- sequencing of land release and provision/coordination of supporting local infrastructure;
- a strategic plan for the Wianamatta-South Creek precinct;
- corridor protection/acquisition and construction of strategic road and rail infrastructure, and
- address the potential adverse impacts on property owners.

2.4 Adverse environmental impacts resulting from the Western Sydney Airport must be addressed.

The NSW Government must develop an integrated transport network strategy (with funding mechanisms) via the *WSAP* between the Western Sydney Aerotropolis and SWGA.

The planning principles enshrined in Council's '*Rural Lands Strategy 2017*' reflect an early opportunity for a direct interface in Agribusiness activity between the Camden LGA and the Western Sydney Aerotropolis.

Council acknowledges the need for locating world-class education facilities in Western Sydney. A combination of the projected population in the Western Parkland City, and access to greenfield sites in the north of the Camden LGA with proximity to the Western Sydney Airport and rail, make the area south of Bringelly Road ideal for locating these new education facilities.

Current development/planning in the upstream areas of the Wianamatta-South Creek Catchment is well advanced; planning for impacts associated with the Western Sydney Aerotropolis must reflect a holistic approach to the entire Wianamatta-South Creek Catchment.

The scale of infrastructure projects (both under construction and planned) for Western Sydney, is significant. The *WSAP* must quantify the cumulative air, noise, environmental,

social and economic impacts of the Western Sydney Airport, North-South Rail Line, Western Sydney Infrastructure Plan etc., all of which will ultimately service the Western Sydney Aerotropolis.

The environmental impacts resulting from the Western Sydney Airport (and associated infrastructure) could be significant for Western Sydney. Through the *WSAP*, DPIE must establish a comprehensive response in mitigating any adverse environmental impacts.

3. Infrastructure

Key Issues for the Camden LGA –

- 3.1 Integrated planning for the Wianamatta-South Creek, Blue-Green Infrastructure Framework.
- 3.2 Ridgeline & Linear Parks – locating sporting grounds should be allocated to spaces that are ‘fit for purpose’, while Linear Parks must be planned to facilitate strategic connections on the ‘green grid’.
- 3.3 ‘Transport network development’ for the Western Sydney Aerotropolis and the broader Western Parkland City should include clarity around timeframes for ‘north-south’ connections between the Western Sydney Aerotropolis, SWGA and broader Macarthur/Wollondilly region.
- 3.4 Council supports a holistic approach to Smart Cities technology-enabled solutions.
- 3.5 Community – an integrated approach to the provision of ‘district-scale’ open space is recommended.
- 3.6 Education - Adjoining the southern boundary of the Aerotropolis, the site of 283-293 Bringelly Road Leppington had previously been identified as a potential location for a new TAFE campus in Western Sydney – it is recommended the *WSAP* reflect the opportunity for the area south of Bringelly Road as part of a future education precinct.
- 3.7 Health – the provision of health facilities within the Aerotropolis may have some adverse implications for its core business.
- 3.8 Through either the ‘Place-based Infrastructure Compact’ process, or via a LUIIP, a holistic/definitive strategy is required (particularly between the Aerotropolis and SWGA) for sequenced infrastructure provision in the Western Parkland City.
- 3.9 A vision for social and cultural amenity is needed to enhance the liveability of Western Sydney.

The significance of the Wianamatta-South Creek Catchment for the Western Parkland City is acknowledged for both the Western Sydney Aerotropolis and SWGA. In this regard, as part of developing the *WSAP*, planning for the Wianamatta-South Creek corridor should



occur concurrently both upstream and downstream. A holistic approach to planning for this part of the Western Parkland City 'Blue-Green Grid' should promote integrated environmental outcomes between the Western Sydney Aerotropolis and the SWGA.

For the planning of 'Ridgeline Parks', it is important that appropriate use is considered in determining a treatment for each area. Sporting grounds tend not to work well on 'ridgeline' areas due to topographical constraints and should be planned for accordingly. Similarly, 'Linear Parks' must be planned appropriately to realise their full potential – this includes facilitating 'green grid' connections between Linear Parks and other open spaces.

To ensure the Western Sydney community is best served, it is important that DPIE work with the Camden LGA community, Council, Transport for NSW and the Greater Sydney Commission (GSC), in determining definitive timeframes for corridor protection, future construction and a timely land acquisition strategy for the various strategically significant corridors e.g. North-South Rail Line, M5 Motorway Extension etc.

While corridors such as The Northern Road are defined, there is an express need to determine other strategically significant connections between the Western Sydney Aerotropolis and the SWGA. The *WSAP* should reflect how/where the Aerotropolis will be served in future by these connections (e.g. M5 Motorway Extension, Jersey Road, Edmondson Avenue & Rickard Road), and what function they will serve e.g. Rickard Road/Edmondson Avenue transit corridor connection to Fifteenth Avenue.

The planning/implementation of digital infrastructure (connectivity/sensor/communications) should have the same importance as that of essential utilities, acknowledging that this technology is critical in enabling the delivery of 'smart place' outcomes. It is important to both encapsulate new technology (e.g. 5G radio cells) as with any key design consideration, and in doing so engage with the community to ensure that any concerns are adequately addressed.

The interface between two initial precincts in the *WSAP* (Aerotropolis Core and Wianamatta-South Creek) provides an opportunity to conduct 'district-scale' open space planning. Council would support a collaborative approach to planning for such facilities between the Camden LGA (South Creek West precinct) and the *WSAP*.

The NSW Government (TAFE NSW) recently sought nominations for a suitable site to locate a future Western Sydney TAFE Construction Hub. Council has corresponded with TAFE NSW, recommending that 283 – 293 Bringelly Road, Leppington provides a strategic opportunity to co-locate a VET institution with the Aerotropolis.

While there is merit in the philosophy of co-locating health and education services relative to the Aerotropolis, there is also the potential for adverse effects associated with proximity to the airport development. Health care facilities, by virtue of the services they provide, are often identified as 'sensitive social infrastructure' - more likely to be affected by impacts such as noise.

Current growth projections for the Western Parkland City (as part of the Greater Sydney Region) highlight the extent to which infrastructure provision is being stretched, to service



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multiple development fronts. The greenfield nature of the Western Parkland City is particularly resource intensive – it is recommended the *WSAP* reflects the cumulative impacts for timely infrastructure provision relative to adjoining areas e.g. SWGA, via either a 'Place-based Infrastructure Compact' or a *WSAP*/SWGA integrated LUIIP.

The future social and cultural amenity of Western Sydney will be considerably influenced by planning initiatives such as the Western Sydney Aerotropolis. To ensure this amenity adequately reflects the community of a future Western Sydney, a comprehensive vision is needed to guide a cultural evolution.

4. Safeguarding the 24-hour airport

Key Issues for the Camden LGA –

- 4.1 Because of the forthcoming airspace design process for the Western Sydney Airport, the structure plan approach for the *WSAP* should also be conducted concurrently for the SWGA, to ensure planning decisions mitigate the impacts of aircraft noise and protect the amenity of new communities.
- 4.2 Council acknowledges the merit of applying public safety areas at each end of the Western Sydney Airport runway(s); mapping in the exhibited *WSAP* to provide an indication of the potential impacts would be appropriate.
- 4.3 With the need for an integrated approach to water and green space management in the Western Parkland City, development of a structure plan for all waterbodies in the *WSAP*/SWGA would also in part mitigate any potential safety implications for the Western Sydney Airport e.g. wildlife strike.

The absence of defined flight paths and other airspace management strategies in the previously adopted Western Sydney Airport EIS and technical documents, highlights a key concern for Council regarding the aircraft noise assessment. The effect of this absence is that the flight paths used for the modelling may change at the time operations commence for Stage 1 of the airport. This creates uncertainty as to the modelling presented and the assessment of what areas and how many people will be affected by aircraft noise. Council recommends a concurrent review of the SWGA Structure Plan, along with sensitivity analysis that would give an idea of the implications that changes in flight paths would have.

While it is acknowledged that the precinct planning phase for the Aerotropolis will address the issue of public safety areas, it is noted that the *WSAP* must depict indicative footprints of these areas at each end of the runway; it is anticipated these would have been defined in any risk analysis of adjoining infrastructure e.g. Sydney Metro Greater West etc.

The issue of water management in the Western Parkland City will be strategically significant – in particular large water bodies and creek systems e.g. Wianamatta-South Creek. Wildlife will also rely on these water bodies and creek systems – what this means

for the safety of the Western Sydney Airport should be addressed in developing a structure plan for water bodies in the *WSAP/SWGA*.

5. Resilience and adaptability

Key Issues for the Camden LGA –

5.1 The cumulative impacts of large-scale infrastructure projects on air quality and visual amenity in Western Sydney require investigation

5.2 A holistic approach is needed to climate resilience and adaptability in the Aerotropolis, and broader Western Parkland City.

To achieve DPIE's 'liveability' aspirations for Western Sydney, there is an expressed need to evaluate how multiple infrastructure projects (e.g. Western Sydney Airport, Sydney Metro Greater West etc.) are impacting the existing/emerging communities – such as the cumulative impacts of Aircraft Noise and Airport Ground Noise (along with safety management issues). It is important the *WSAP* responds to these issues, as it provides the strategic direction for resilience and adaptability in the Aerotropolis.

Recent extreme weather events in Western Sydney highlight the need for an emphasis on more than a business-as-usual approach to climate resilience and adaptability. More needs to go into planning for climate change resilience for the Aerotropolis and the broader Western Parkland City. A climate risk assessment should be undertaken to inform the planning of climate change resilience, to be reflected in the SEPP and DCP.

6. Precinct planning

Key Issues for the Camden LGA –

6.1 Out-of-sequence land development arrangements have the potential to undermine infrastructure coordination, industry confidence and mitigate land development potential.

A place-based planning approach is essential for the success of the Western Sydney Aerotropolis – with a focus on integrated transport and land-use planning. Out-of-sequence development risks undermining a diligent planning approach. It is imperative that the NSW Government commits to a planned sequence in the Western Sydney Aerotropolis, to ensure the *WSAP* helps deliver a sustainable beginning for the Western Parkland City. Council would welcome the opportunity to work collaboratively in this regard with DPIE, the GSC and Western City & Aerotropolis Authority (WCAA) for the Western Parkland City.

While the *WSAP* identifies a series of 'desirable land uses' for each precinct, its use in out-of-sequence land development is a considerable risk. The *WSAP* must reflect a staged, government-led (in partnership with industry) approach to land-use planning, supported by coordinated infrastructure delivery.

7. Infrastructure funding and provision

Key Issues for the Camden LGA –

- 7.1 In developing a 'Place-based Infrastructure Compact' (PIC) as part of the *WSAP*, there is a need to integrate local developer contributions as part of a holistic approach to infrastructure planning;
- 7.2 The *WSAP* provides an opportunity for DPIE to address an urgent need for an integrated, holistic infrastructure funding framework (including value capture).

To provide a holistic infrastructure plan via the PIC, it is important that local developer contributions are included, as they form an integral part of the overall 'infrastructure picture'. It is recommended that DPIE liaise further with the GSC, and collaborate with Council, to include local developer contributions as part of the PIC in developing the *WSAP*.

Regarding funding for the *WSAP*, there is an urgent need for a holistic, integrated reform of infrastructure funding legislation – including a 'value capture' mechanism as part of the solution. With the review by the NSW Government of the Special Infrastructure Contribution (SIC) levy, and pending local developer contributions reform, the timing is opportune to tackle the issue of value capture concurrently with these existing methods.

Ongoing engagement

DPIE's *'Planning guideline for Major Infrastructure Corridors'* provides direction for infrastructure agencies on the planning mechanisms for corridor protection projects – this guideline is especially relevant to the *WSAP* given the interface with multiple infrastructure corridors (e.g. North-South Rail Line, M5 Motorway Extension, M12 Motorway, future aviation fuel pipeline corridor etc.) The guidelines state:

"Through the development and investigation of options, the land requirements to support the infrastructure project can be identified. All public consultation on corridor options will be led by the agencies. It is the agencies responsibility to provide sufficient detail about the corridor options at this time, so that the community can be informed about the implications of each option and is given the opportunity to participate in the process of determining the preferred corridor alignment. Once the preferred alignment has been identified and assessed, statutory protections can be created which can assist delivery of the infrastructure project in the future".

Council encourages DPIE to have an ongoing commitment to work with Council and the community, to ensure that any planning initiatives associated with the *WSAP* are implemented through a collaborative engagement process e.g. conducting community engagement sessions within the Camden LGA; and, that more information is made available regarding the *WSAP*.

Camden 'Draft Local Strategic Planning Statement 2019'

Camden is the fastest growing local government area in Australia, welcoming more than 100 new residents every week. In planning for this growth, Council's *Draft Local Strategic Planning Statement 2019* identifies the vision as Camden being a place of opportunity, built on a foundation of respect for the environment, with a well-managed approach to growth, social inclusion and economic innovation.

As depicted in **Figure 1 in this submission**, there are a number of local planning priorities for the Camden LGA that require careful consideration in developing the *WSAP*. Given proximity to the south of the Aerotropolis to the areas of future growth in the Camden LGA, an integrated approach between the *WSAP* and the *Draft Local Planning Statement 2019* would promote optimal planning outcomes for the Western Parkland City.

Council commends the vision for Camden as per the *Draft Local Strategic Planning Statement 2019*, to the NSW Government; it clearly articulates what is important to the Camden LGA community, and is especially applicable for the Western Parkland City as part of the ongoing planning for the *WSAP*.

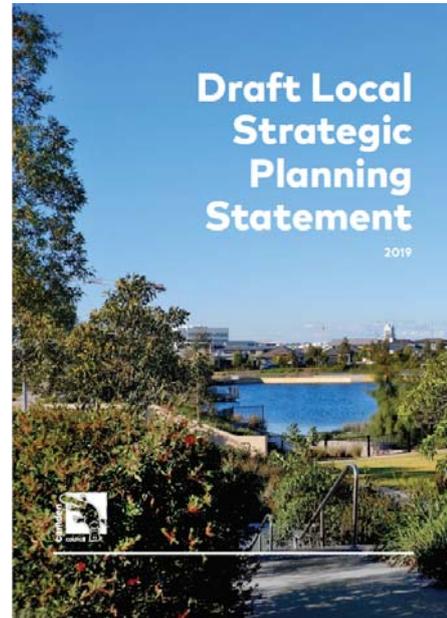
Camden 'Community Strategic Plan'

It is important that the NSW Government has regard to the current community vision as adopted by Council on 21 June 2017 i.e. *Community Strategic Plan – Shaping the Camden Local Government Area June 2017*, when planning for growth in the Western Parkland City (including the Camden LGA).

Council's *Community Strategic Plan (CSP)* identifies the community's main priorities and aspirations for the future (at least 10 years), and the plans and strategies for achieving these goals. Strategies regarding actively managing growth in the CSP include:

1.1.1 *Ensure provision of appropriate urban development for sustainable growth in the Camden LGA;*

1.1.2 *Manage and plan for a balance between population growth, urban development and environmental protection;*



Draft Local Strategic Planning Statement

Local Priority II	Local Priority L1	Local Priority P1	Local Priority S1
Aligning infrastructure delivery with growth	Providing housing choice and affordability for Camden's growing and changing population	Increasing the quantity and diversity of local jobs, and improving access to jobs across the Western City District	Improving the accessibility and connectivity of Camden's Green and Blue Grid and delivering high quality open space
Connecting Camden through integrated transport solutions	Celebrating and respecting Camden's proud heritage	Encouraging successful centres through a clearly defined centre hierarchy	Protecting and enhancing the health of Camden's waterways, and strengthening the role and prominence of the Nepean River
Planning for the delivery of the North South Rail and South West Rail Link Extension	Providing services and facilities to foster a healthy and socially connected community	Strengthening the Strategic Centres of Hamilton and Leppington	Protecting Camden's rural land
Working in partnership to deliver a more flexible, productive and sustainable Camden	Encouraging vibrant and connected centres which reflect Camden's evolving character	Ensuring a suitable supply of industrial and urban services land	Protecting and restoring environmentally sensitive land and enhancing biodiversity
	Supporting cultural infrastructure to provide cultural and creative spaces	Leveraging industry opportunities created by Camden's proximity to the Western Sydney Airport and Aerotropolis	Reducing emissions, managing waste and increasing energy efficiency
		Leveraging Camden's natural and cultural assets to promote local agricultural production and increase tourism	Improving Camden's resilience to natural hazards and extreme weather events

Figure 1 – Camden Draft LSPPS



1.1.3 Ensure adequate, accessible and high quality open and public space is made available across the Camden LGA;

1.2.1 Ensure rural land and associated landscape impacts are addressed.



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Western Sydney Aerotropolis Plan

1. A vision for the Aerotropolis

Council recommends that the Department of Planning, Industry & Environment:

- Develop an economic development strategy for Western Sydney. The projected 200,000+ job deficit in Western Sydney requires a solution via a diversified and integrated economic, land-use and transport strategy, that doesn't rely solely on the Western Sydney Airport;
- Facilitate comprehensive, meaningful engagement with the Camden LGA community, regarding the *WSAP*; and
- Carefully plan from the outset for compact, walkable precincts as the vision for the Aerotropolis.

Jobs for the Camden LGA community

Western Sydney needs an economic development strategy. The combined investment by the Australian and NSW Governments in the Western Sydney Airport, Western Sydney Infrastructure Plan and North-South Rail (stage 1), is approximately \$20bn. As an extension of the NSW Government's *NSW 2040 Economic Blueprint*, an economic development strategy for Western Sydney will ensure this \$20bn investment facilitates optimal economic outcomes for the Western Parkland City, inclusive of the Western Sydney Aerotropolis.

The intent of the *WSAP* is to determine a foundation for the land-use, infrastructure, sustainability, and urban design work that will guide and shape the development of the Aerotropolis. As depicted in **Figure 2 in this submission**, to realise the Western Sydney Aerotropolis' vision requires a range of diverse and cohesive initiatives, with the objective of optimising economic opportunities from the Western Sydney Airport and the emerging Western Parkland City.

As part of this vision, the *WSAP* indicates that the Aerotropolis "...contributes to greater productivity and a significant increase in jobs for Western Sydney in areas such as defence and aerospace, advanced manufacturing, technology agribusiness, health, education, research and tourism" (page 18).

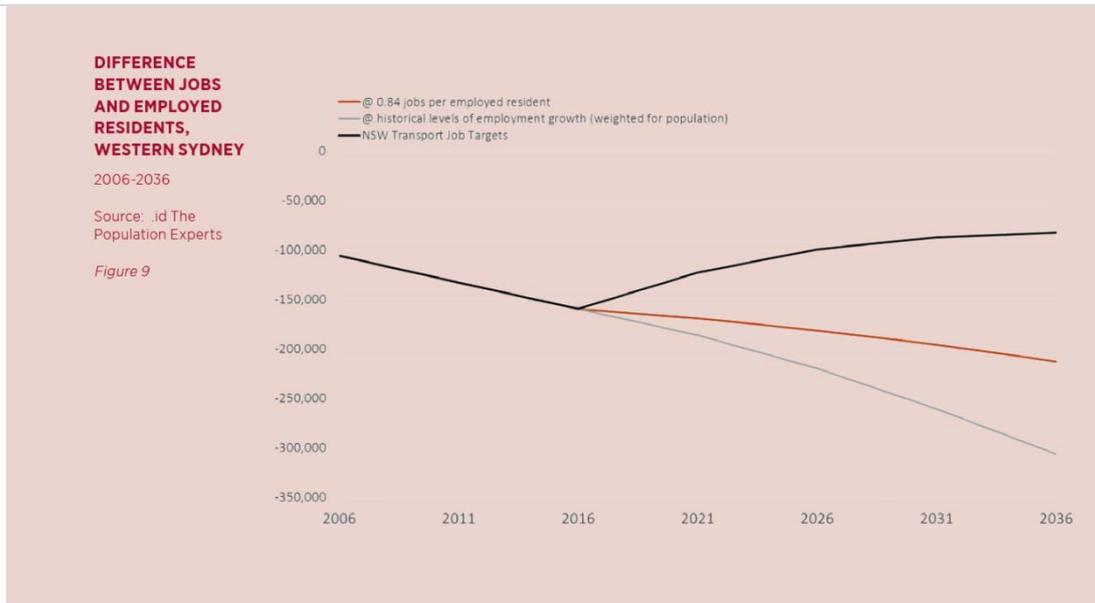


Figure 2 – Meeting the vision

Council acknowledges the significance of the WCAA's vision of 200,000 jobs for the Western Parkland City, as it would address a projected jobs deficit previously identified in a report prepared by Western Sydney University, '*Addressing Western Sydney's Jobs Slide*'.

Page 14 of Western Sydney University's report notes that if a linear approach (i.e. consistent with previous years) to planning and economic development in Western Sydney continues, the number of resident workers in Western Sydney will grow by 309,695 in the next twenty years, an increase of 30.9%. If the rate of jobs growth remains consistent with 2011 census data for this period, then jobs growth will fall behind worker growth. This would result by 2036 in the number of jobs in Greater Western Sydney growing by 256,737, or 22%. As a result, (by 2036) there will be 210,000 fewer jobs than resident workers in the region.

Figure 3 in this submission (below) provides a graphic representation of the 210,000 projected jobs deficit in Western Sydney to 2036.



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Western Sydney University

Figure 3 – Projected jobs deficit in Western Sydney to 2036 (source: Western Sydney University)

While the WCAA’s vision for 200,000 jobs provided over the next 20 years is welcomed, it is recommended that in subsequent stages of the *WSAP* that DPIE provide greater certainty as to the ratio of job types available within each of the various industries, relative to the skillset of the local labour workforce.

In meeting the vision for the Western Sydney Aerotropolis, and most importantly Western Sydney (including the Camden LGA), the *WSAP* should articulate what portion of jobs will become available between the different industries.

Western Parkland City – a vision for 200,000 jobs

<p><u>Job types include:</u></p> <ul style="list-style-type: none"> • aerospace and defence; • creative industries and the technology sector; • agribusiness; • manufacturing & logistics; • environment and sustainability; • tourism; • health and education; and • arts and cultural. 	<p>Of the 200,000 jobs, what is the % of each job type?</p> <p>How many of these jobs will be in the Camden LGA?</p>
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In planning for the Western Sydney Aerotropolis and sustainable growth in Western Sydney, it is particularly important to understand how many jobs each of these industries will generate, and the synergies/interdependencies between them, that may influence their success or failure.

Council's concern for its future residents in the Camden LGA, and as part of the Western Parkland City, is that the Western Sydney Airport is the primary/majority delivery agent in addressing the projected 200,000+ jobs deficit. Indicative job projections in the *WSAP* depict the *WSAP* delivering more than half the vision of 200,000 for the Western Parkland City. In this regard, if the Western Sydney Airport is not successful in the anticipated timeframe, and if for

example only 50,000 jobs are delivered, the social implications for Western Sydney may be dire.

To expand further on the point of providing local, sustainable employment opportunities, reference is made to the adjacent extract from the WCAA's strategy, *Delivering the Western Parkland City 2019*.

With the goal of creating 'locally-relevant jobs in Campbelltown, Liverpool and Penrith', the Camden LGA will continue to experience a daily 'jobs exodus' i.e. residents leaving their area every day to find employment.

3.3 CREATING LOCALLY-RELEVANT JOBS IN CAMPBELLTOWN, LIVERPOOL AND PENRITH

The existing centres of Liverpool, Campbelltown and Penrith all have a level of commercial development and jobs across a wide range of industries. However, across the Western Parkland City, local government areas are experiencing 'job exodus', with high numbers of residents commuting to jobs in other city centres. The Authority will work with the local governments to develop locally-relevant industry and attraction strategies.

The Authority will work with the local governments to develop locally-relevant industry and job attraction strategies.



Source: WCAA - *Delivering the Western Parkland City 2019*

It is important that the analogy of 'putting all the eggs in one basket' doesn't eventuate through the Western Sydney Aerotropolis planning process. There must be greater emphasis on economic



development opportunities within areas adjacent to the Western Sydney Aerotropolis, reflected in an economic development strategy for Western Sydney, to ensure local opportunities for investment are not lost in the context of higher order employment lands within the *WSAP*.

Engagement with the Camden LGA community

Council notes the importance of engagement by DPIE with the Camden LGA community on the *WSAP* project.

As noted previously in this submission, DPIE's '*Planning guideline for Major Infrastructure Corridors*' provides direction for infrastructure agencies on the planning mechanisms for corridor protection projects, which would apply in part to the *WSAP*.

Council strongly encourages DPIE to ensure it comprehensively includes the Camden LGA community on the journey toward developing the Western Sydney Airport and Western Sydney Aerotropolis. Without a collaborative engagement process with the communities most affected by the Western Sydney Airport and Western Sydney Aerotropolis, the NSW Government (and Australian Government) put at risk both a significant investment of public funding, as well as the wellbeing of existing and future residents in Western Sydney.

Transitioning to an Aerotropolis

In the building industry, the analogy of 'measure twice, cut once' depicts the ethos of getting the best outcome through good planning. The same approach can be applied to the vision for the Aerotropolis, of 'plan twice, develop once' i.e. planning and developing compact, walkable precincts upfront that meet the sustainability, liveability and connectivity objectives of the region. By allowing larger building footprints to develop as a 'transitional' arrangement in the Aerotropolis, is likely to impede the compact/walkable precinct vision.



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2. Implementing the vision

Council recommends that the Department of Planning, Industry & Environment:

- Conduct planning for road infrastructure that supports the *WSAP*, to reflect an integrated strategy in articulating how the transport network will function/be funded between the Western Sydney Aerotropolis, SWGA and surrounding areas;
- Amend the *WSAP* so that the Dwyer Road Precinct is an integrated component of the Agribusiness Precinct with a flexible zoning, as part of the first stage of the Aerotropolis development; and
- Include the location of world-class education facilities in an expanded Aerotropolis Core Precinct, south of Bringelly Road - **planning of the Aerotropolis should not be undertaken in isolation of the extensive development happening in the rest of the Western Parkland City.**

Airport – Road Infrastructure

The *WSAP* requires an integrated, contingent transport planning strategy that quantifies all impacts of the Western Sydney Aerotropolis and Western Sydney Airport on the local road network (including all east/west and north/south connections) which is justified by a robust cost-benefit analysis and traffic modelling data.

To facilitate the successful delivery of integrated transport infrastructure in Western Sydney, a well-connected, well-designed and free-flowing road network supported by appropriate infrastructure is needed to provide effective movement of people and goods within the local area and broader region. Without an integrated strategy reflected in the *WSAP*, a future Western Sydney Airport at full development (stage 2) would create extensive congestion on the local road network in the Camden LGA; with heavy freight and commuters travelling to/from the airport site via local roads.

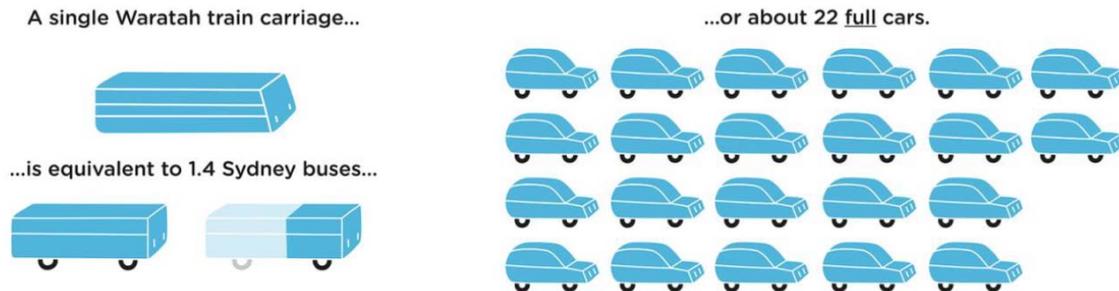
While the Australian Government's 'Western Sydney Infrastructure Plan' in support of the Western Sydney Airport is acknowledged, the potential adverse impacts on the local road network still needs to be quantified by DPIE via the *WSAP*. For example, as part of the broader transport planning for Western Sydney, there is a need for a review of the '*South West Growth Area Road Network Strategy*', in the context of the Western Sydney Aerotropolis, North-South Rail and South West Rail Link Extension. Similarly, an integrated review of other, sustainable transport modes (bus network, pedestrian, and cycling networks) is also required; along with any capacity for the promotion of interim

uses on the broader transport network where corridor protection has occurred, such as the provision of rapid bus services within the corridor.

Regarding corridor preservation for future road and transport infrastructure, as evidenced in previous NSW Government led projects (e.g. South West Rail Link), the sterilisation of land once transport corridor options are defined highlights the need to determine a clear timetable for acquisition, beyond the statutory planning protections. This will provide greater certainty around the approach to development applications involving significant capital investment, and a degree of certainty for residents and landowners. Implications for the sterilisation of land resulting from corridor preservation will be significant for certain landowners.

Airport – Transport Infrastructure

The NSW Government's *Future Transport Strategy 2056* noted transport as a 'placemaker' in its description of liveable communities, transforming public domain, activating centres and unlocking new activity. With the projected population growth for Western Sydney, both Australian and NSW government investment in transport infrastructure e.g. North-South Rail Line etc. will influence core planning objectives, including affordable housing, connectivity, liveability, resilience and sustainability. While the *Western Sydney City Deal* confirms funding for part of the North-South Rail Line, to date there is no funding commitment for construction of the full extent of the rail line through to Oran Park, Narellan and Campbelltown-Macarthur.



(Source: *Draft Future Transport Strategy 2056*)

As part of the NSW Government's vision of a system to support the growing Greater Sydney economy, public transport must play a pivotal role in alleviating urban congestion. An early commitment to constructing the full extent of the North-South Rail Line and South West Rail Link Extension will alleviate congestion and improve travel times and quality of life for residents in support of economic growth in Western Sydney.

Funding: as to its context regarding future funding of road and transport infrastructure in the Western Sydney Aerotropolis and SWGA, this issue is expanded upon further in *Section 7. Infrastructure funding and provision*, in this submission.

The *WSAP* could consider the use of the North-South Rail corridor for the purpose of temporary rapid bus connections between the Western Sydney Airport, Oran Park, Narellan and Campbelltown-Macarthur. Early establishment/operation of this corridor



through the SWGA is likely to facilitate influence over commuter behaviour to/from the Airport/Aerotropolis; a behaviour that, once heavy rail is constructed south of the Western Sydney Aerotropolis, should translate to high-levels of patronage on this strategic transit corridor from the outset.

Note: in the context of transport infrastructure, reference is made to the Structure Plan on page 27 of the *WSAP*; specifically, the legend reference for 'Key Network Upgrades'. It is currently difficult to discern from this plan, where the 'Key Network Upgrades' will occur. Council recommends further improvements to the Structure Plan in making this information legible.

Agribusiness – Dwyer Road precinct

Given the scale and anticipated longevity of the Western Sydney Airport project, a staged approach to the structure planning for the Aerotropolis is acknowledged as a prudent approach. The initial stages in the *WSAP* as currently proposed are depicted in **Figure 4** of this submission.



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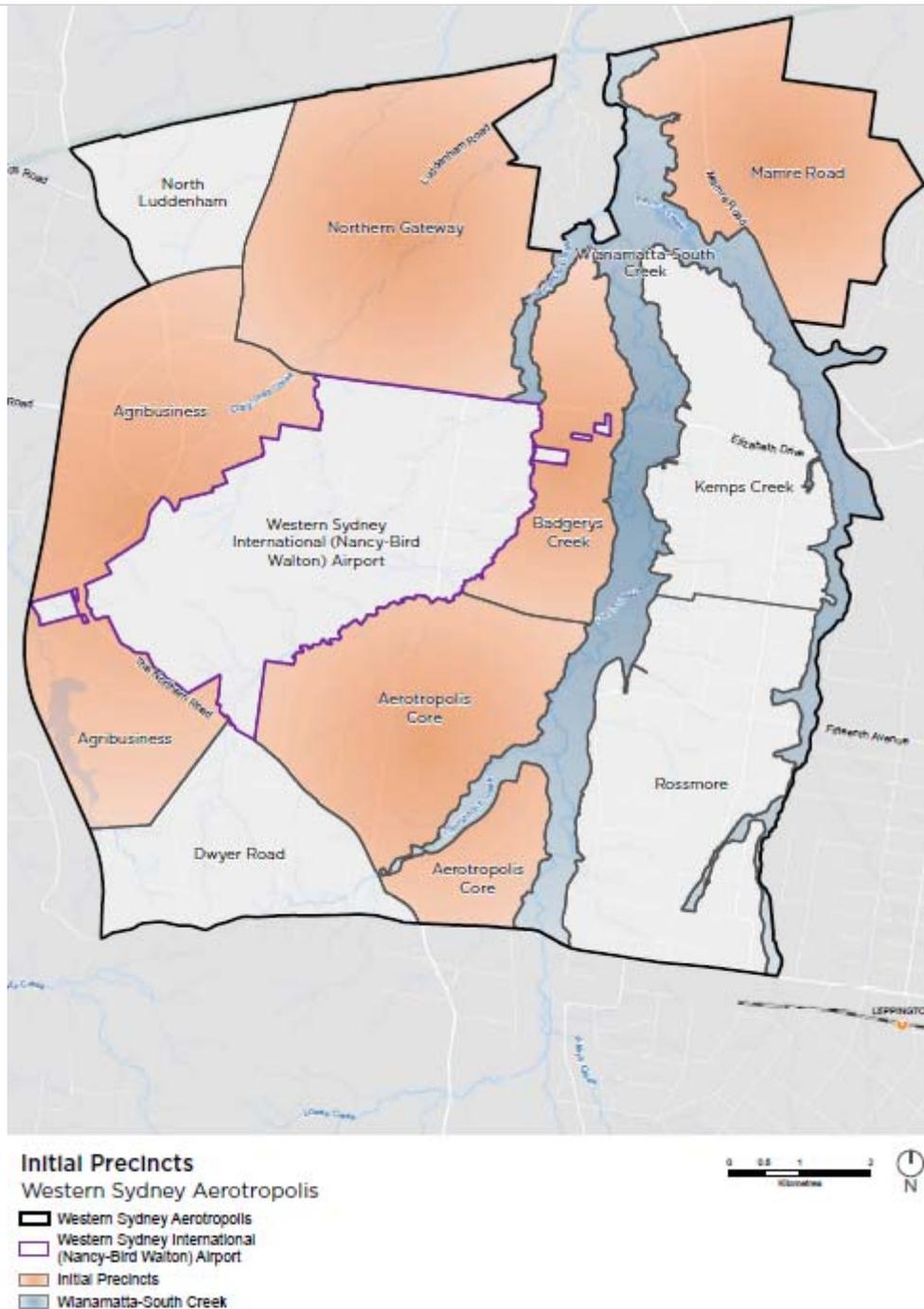


Figure 4 – Proposed Western Sydney Aerotropolis Initial Precincts (source: DPIE)

Further to the initial precincts identified, it is recommended that DPIE investigate the integration opportunities for the Dwyer Road precinct as an ‘Agriculture and Agribusiness’ area as part of the proposed ‘flexible zoning’. Council notes that part of the proposed Dwyer Road precinct could form an integral component of the Agribusiness function of the

Aerotropolis, and future Agribusiness areas to the south in the Camden LGA as part of the 'Metropolitan Rural Area'. In this regard, the identification of the Dwyer Road precinct as a flexible employment area should have consideration of these potential future land-uses.

As the Dwyer Road precinct proposal has implications for rural land in the Camden LGA as part of the 'Metropolitan Rural Area'; the planning principles enshrined in Council's '*Rural Lands Strategy 2017*' warrant consideration by DPIE in identifying how Agriculture and Agribusiness can effectively interface between the Aerotropolis and the Camden LGA - in alignment with principles in Council's '*Rural Lands Strategy 2017*', including:

- 1. *Protect Camden's remaining rural lands;*
- 3. *Provide certainty and avoid rural land fragmentation; and*
- 5. *Enhance Camden's rural economy.*

Council's *Draft Local Strategic Planning Statement 2019* also notes the need to manage growth "*carefully and effectively to ensure the retention of the places, landscapes and characteristics of Camden's rural heritage and background*" (page 70).

Camden Council

Local Priority S3 Protecting Camden's rural land



Relationship to other plans and policies	Local Priority S3 is consistent with Camden's CSP Key Directions: 2.'Healthy Urban and Natural Environment'	
	Local Priority S3 also gives effect to the Sydney Region Plan Directions: 8. A city in its landscape	
	Local Priority S3 also gives effect to the Western City District Plan Priorities: W17. Better managing rural lands	
Actions and timeframes	Council will continue to implement the recommendations and actions within the Camden Rural Lands Strategy	Ongoing
	Council will review existing planning instruments to minimise and manage rural land conflicts	Short Term
	Council will work with Wollondilly Council and the Sydney Peri-Urban Network (SPUN) to explore options to protect agricultural land and encourage local food production	Short Term

(Source: Camden Council - *Draft Local Strategic Planning Statement 2019*)

The Camden LGA has a long-established agricultural sector, that is well placed for economic integration with export activity made accessible by the Western Sydney Airport.

The interface between the Camden LGA agricultural sector, would enable the opportunity for agricultural export activity from the Airport's opening in 2026 – precinct planning in the *WSAP*, particularly regarding Dwyer Road must support this opportunity via an appropriate zoning.

Aerotropolis Core Precinct

It is noted that a strategic outcome of the *WSAP* for the Aerotropolis Core Precinct, is to “*plan for a centre for excellence in STEM-based education including secondary, vocational (VET) and tertiary education facilities*” (page 62 *WSAP*).

There may be merit in the consideration of expanding the Aerotropolis Core Precinct south of Bringelly Road, to encapsulate these education facilities as part of servicing the broader Camden LGA and Western Sydney communities.

For example, the *WSAP* acknowledges the need to locate noise sensitive development (such as schools) outside of the ANEC/ANEF 20-25 contours. As a result, this may infer an education precinct would be best located at the southern extent of the Aerotropolis Core Precinct, closest to Bringelly Road. In this regard, it may be of benefit to consider its location within the Camden LGA, either with proximity to the South West Rail Link Extension and/or the Sydney Metro Greater West.

The Camden communities' vision on education depicted in the *Camden Community Strategic Plan* is “3.1.1 Ensure employment, tourism and education opportunities are expanded across the Camden LGA”. Schools are vital institutions in our society. They educate our future generations and provide essential skills to emerging workforces.



Regional Educational Precinct (Sample Impression)

While there is already a presence of tertiary institutions in Campbelltown, Liverpool and Penrith, through an expanded Aerotropolis Core Precinct there is an opportunity to develop the education space further, in the Camden LGA. As part of the structure planning process for the Aerotropolis, DPIE should explore further the opportunities in extending the Aerotropolis Core Precinct into the Camden LGA, to facilitate its integration with both the Western Sydney

Aerotropolis and growing Camden community.

Further to these options, it is important to note that **the planning of the Aerotropolis should not be undertaken in isolation of the extensive development happening in the rest of the Western Parkland City.**

The ‘desirable land uses’ for the Aerotropolis Core Precinct, as outlined in Section 7.2.1 (page 58 of the *WSAP*), are broad. Whilst it is acknowledged that the intent of the *WSAP* is to provide flexibility and attract investment, this should not mean that the market alone is left to entirely dictate the nature of this future centre. By contrast, the Northern Gateway Precinct provides a more focused vision for the potential future land uses, primarily around food science and technologies with complementary residential and retail uses. These



uses are understood as being important to activate the Precinct for its primary purpose of achieving a successful employment, education and innovation hub.

The *Western City District Plan* outlines the potential future industries that could be located within the Aerotropolis, within the context of the entire Western Parkland City. The District Plan does not mention the inclusion of, for example, cultural and sports precincts within the Aerotropolis. Whilst the Aerotropolis Core Precinct should not necessarily exclude these uses, these should be considered as complementary to the key employment generating land-uses and provided for in the interests of activating the Precinct. There also needs to be greater consideration of the impact on surrounding centres not located within the Aerotropolis area, and the potential to locate some of these complementary uses outside of the Aerotropolis Core Precinct, or even outside of the Aerotropolis e.g. in the Camden LGA.

While in the early stages of evolutionary planning for a new city centre, there will continue to be opportunities for certain land-uses and planning approaches to be tested as the Precinct progresses. In this regard, it is important that there is an appropriate balance between marketing the precinct to attract early investment, while striving for optimal planning outcomes in ensuring that proper consideration is given to the Aerotropolis' role in the broader Western Parkland City.



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3. Infrastructure

Council recommends that the Department of Planning, Industry & Environment:

- As part of developing the Blue-Green Grid infrastructure framework, develop a strategic plan for the Wianamatta-South Creek precinct;
- Via the Blue-Green grid infrastructure framework, ensure the strategic plan for the Wianamatta-South Creek Catchment governs how it will function in an integrated way between the Western Sydney Aerotropolis and SWGA (including funding for regional drainage infrastructure via an amended Special Infrastructure Contribution Levy);
- Plan for the appropriate location of Sporting Grounds to areas other than just Ridgeline Parks, and facilitate connections between multiple Linear Parks throughout the Aerotropolis;
- Proceed in finalising the corridor protection process (e.g. Rail, M5 Motorway Extension etc.), inclusive of definitive timeframes for preservation, acquisition and construction;
- In reflecting the commitment under the 'Western Sydney City Deal' for the 'Western City Digital Action Plan', ensure the *WSAP* is conducive to promoting tangible digital solutions and technologies;
- Explore an integrated approach to planning between the *WSAP* and the Camden LGA, on social infrastructure issues such as community facilities, education and health;
- Consolidate infrastructure planning between the *WSAP* and the SWGA, via an integrated LUIIP or extended 'Place-based Infrastructure Compact'; and
- Explore the vision of creating cultural amenity in the Western Sydney Aerotropolis integrated with the Camden LGA, that enhances the liveability of Western Sydney.

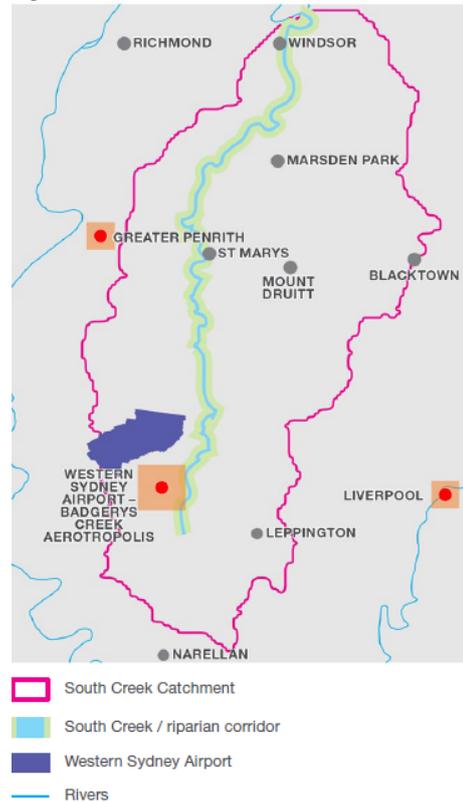
Wianamatta-South Creek Precinct

The vision for Wianamatta-South Creek, reflected in the *Western City District Plan*, *Western Sydney City Deal* and the *WSAP* is supported; as a part of the *Western City District Plan*'s 'Blue-Green Grid' that will provide amenity through parks, community facilities and ecological services, Wianamatta-South Creek will function as the conceptual 'heart' of the Western Parkland City (and in turn, the Aerotropolis). Given local government is likely to inherit much of the maintenance responsibility for public land in this precinct, it is important that new maintenance funding mechanisms are established and maintained in perpetuity.

As part of the subsequent staged planning for Wianamatta-South Creek, it is important that DPIE (in conjunction with key stakeholders, including Council) prepare a strategic plan that identifies a range of opportunities for recreation and community facilities associated with the development of land within and adjacent to the Wianamatta-South Creek corridor (as noted in the *Western City District Plan*).

Council is currently undertaking a Blue-Green Grid Analysis, which forms part of the broader suite of strategy and policy documents commissioned through the LEP Review project. The Blue-Green Grid Analysis will investigate opportunities to implement the Sydney Green Grid at the local scale. Projects identified through this process will seek to establish or enhance hydrological and ecological aspects of the Grid. Many components of the Camden LGA Grid feed into broader District connections, as identified in the *Western City District Plan* (including Wianamatta South Creek and Kemps Creek which are identified as priority corridors in the District Plan). It is noted that some of these corridors run through the wildlife buffer zone identified in the *WSAP*. The rehabilitation of ecological corridors has the potential to attract wildlife, with their increased presence an indication of a successful implementation of the Grid. As such more information is required to outline how the Blue-Green Grid will be implemented in areas within proximity to the wildlife buffers.

Figure 46 – South Creek corridor



Source: *State Infrastructure Strategy* – page 167

In DPIE developing a strategic plan for Wianamatta-South Creek, it should be inclusive of drainage implications of future development resulting upstream, in the Wianamatta-South Creek corridor i.e. from future development in the Camden LGA. While both Council officers and DPIE have worked collaboratively on this issue to date, a further body of work is needed to quantify the drainage impacts for Wianamatta-South Creek, in the event that the Western Sydney Aerotropolis develops in advance of the bulk of future development in the Camden LGA.



This point is particularly significant in light of DPIE’s consideration of using/discharging treated wastewater into the Wianamatta-South Creek catchment. While the anticipated ‘heat island’ effect of a fully developed Western Sydney Aerotropolis and Western Parkland City is a significant challenge for environmental management, it will be necessary to determine what capacity the Wianamatta-South Creek corridor will have in managing conflicting land-use and water management functions. In this regard, it is recommended that DPIE develop the strategic plan for the Wianamatta-South Creek Precinct (i.e. corridor/catchment), prior to progressing the Stage 2 *WSAP*, inclusive of a definitive flooding assessment (including Probable Maximum Flood Assessment) for the Wianamatta-South Creek Precinct, to mitigate any adverse impacts on the floodplain, Wianamatta-South Creek and other significant water bodies e.g. large upstream farm dams.

While DPIE is currently at the structure planning stage of the Western Sydney Aerotropolis project, it is important that a definitive flood impact assessment is completed prior to proceeding to the next phase. A thorough investigation is required into the issue of surface water and flooding, before a Stage 2 *WSAP* is determined for specific land-uses that will interface with the Wianamatta-South Creek corridor.

Actions	Responsibility
71. Implement the South Creek Corridor Project and use the design principles for South Creek to deliver a cool and green Western Parkland City.	Councils, other planning authorities, State agencies and State-owned corporations

Source: *Western City District Plan* – page 113

Water Smart Planning in the Wianamatta-South Creek Catchment



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2017 Metropolitan Water Plan framework

Goal	Outcome	Strategies
A liveable, growing and resilient Greater Sydney	Our water supply is secure and affordable	Making the best use of our existing supplies
		Investing in water conservation
		Investigating new water sources for long-term needs
	Our water supply system is resilient to stresses and shocks	A Drought Response Strategy with a broad suite of measures
		Identifying and mitigating risks to water security
		Planning for our variable climate and climate change
	Our urban communities are more liveable and resilient	Establishing the WaterSmart Cities program
		Investigating barriers and enablers to cost-effective water recycling
		Establishing partnerships and collaborative arrangements
	Rivers downstream from dams are healthy	Implementing variable environmental flows from Warragamba Dam
		Modifying Warragamba Dam to release the flows
		Protecting the benefits of environmental flows
Monitoring and adaptive management of flows		
Adaptive planning		

FIGURE 1: 2017 Metropolitan Water Plan framework showing the goal, outcomes and strategies of the plan

As noted previously in this submission, the vision for Wianamatta-South Creek, reflected in the *Western City District Plan*, *Western Sydney City Deal* and the *WSAP* is supported. However, it is important that the *WSAP* accurately reflects a transparent framework for the integrated, sustainable management of Wianamatta-South Creek.

Example 1: While not clearly articulated in the *WSAP*, at recent industry briefings DPIE officers advised the option of investigating the discharge of wastewater into the Wianamatta-South Creek catchment. While this may reflect the pending objectives of the ‘2017 Metropolitan Water Plan Framework’, it is critical that this thinking is reflected in the *WSAP* if that is the NSW Government’s intention. Planning for urban development in the SWGA is currently subject to specific criteria that prescribes stormwater

discharge in a restricted way (i.e. dry, offline basins). An intended change in the form of treated wastewater discharge into Wianamatta-South Creek would have significant water management and environmental implications; both of which must be explored in the *WSAP*.

Example 2: There are a series of large farm dams located upstream of the Western Sydney Aerotropolis, that currently serve a regional water management (drainage) function. The *WSAP* represents an opportunity to address the issue of regional drainage management between the Western Sydney Aerotropolis & SWGA. This must include an appropriate funding mechanism i.e. as part of the Special Infrastructure Contribution Levy review, to ensure the integrity of water management in the Wianamatta-South Creek catchment relative to the Western Sydney Airport site.

Recommendation 93

Infrastructure NSW recommends the completion of the South Creek Corridor strategic business case by late 2018.

Recommendation 94

Infrastructure NSW recommends that Water NSW and Sydney Water consider a portfolio of options for the augmentation of Sydney’s water supply, including the findings of the South Creek strategic business case, and provide advice to the NSW Government for its consideration by early 2019.

Source: *State Infrastructure Strategy – page 167*

The recommendations made by Infrastructure NSW regarding completion of a strategic business case for the Wianamatta-South Creek Corridor, must occur concurrently with the *WSAP* process.

Ridgeline & Linear Parks

While it is acknowledged that locating local/passive park amenities on 'ridgelines' is appropriate, the same is not necessarily so for sporting grounds. It is important to note the future need for a mix of spaces, and their distribution to land that best fits their purpose.

'Multi-functional Linear Parks' need to be provided to also run perpendicular to infrastructure/riparian corridors, in order to make network connections (often over ridgelines). Otherwise there are just very strong linear 'north-south' links, with few 'east-west' connections; this approach would complete a network grid across the *WSAP* area, and broader Western Parkland City.

'North-South' Transport Connections

The importance of preservation for strategic transport corridors such as the North-South Rail Line, Rapid Bus Corridors etc. will form an integral part of the Western Sydney Aerotropolis' need for a functional transport network.

However, it is also noted that the sterilisation of land once transport corridor options are defined highlights the need to determine a clear timetable for acquisition and construction, beyond the statutory planning protections. This will provide greater certainty around the approach to development applications involving significant capital investment, and a degree of certainty for residents and landowners e.g. M5 Motorway Extension.

The Australian Government's example of acquiring land for the Western Sydney Airport site over several decades demonstrates that early land acquisition for significant infrastructure projects is common and provides certainty for all stakeholders.

While corridors such as The Northern Road are defined, there is an express need to determine other strategically significant connections between the Western Sydney Aerotropolis and the SWGA e.g. M5 Motorway Extension.

For example, the *WSAP* should identify the Rickard Road/Edmondson Avenue corridor as a key north-south connection between Fifteenth Avenue, the Rossmore precinct and Leppington precinct. This would provide an opportunity to establish high-quality pedestrian/cycle connections between the Aerotropolis and the Camden LGA.

Digital Infrastructure - Smart Cities

Under the digital infrastructure commitment in the Western Sydney City Deal, there is an opportunity for all levels of government to deliver tangible digital solutions and technologies in the Western Parkland City, that the community both need and want. In this regard, the NSW Government, in part via the *WSAP*, can establish a strategic direction for key digital actions such as:

- Inclusive community connectivity;
- Being effective with data use;
- Partnering with other tiers of government, the community and industry;



- Responsibly managing data; and
- Infrastructure investment that is fit for purpose/future.

Council encourages DPIE to expand the strategic vision for digital infrastructure in the *WSAP*, to ensure it clearly aligns with the outcomes of the commitment under the Western Sydney City Deal, as well as other relevant policies e.g. *NSW Internet of Things Policy*.

Open Space – Regional Parks

The proposal of a southern regional park as an interface between the setting of the Wianamatta-South Creek corridor and urban areas is acknowledged as a key opportunity to conduct ‘district-scale’ open space planning. In this regard, Council would welcome the opportunity to participate in a collaborative approach with DPIE for the planning for such a facility. Arbitrary lines such as the extent of the *WSAP* or local government boundaries, should not inhibit the aspiration to attain good planning outcomes for all surrounding communities in the Camden LGA.

Education

Designated as a strategic centre under the *Western Sydney District Plan*, Leppington is an ideal opportunity for the *WSAP*, to integrate primary and tertiary education with the landscape, to create places of wellbeing and learning. In this regard, TAFE NSW’s mandate to locate a suitable site for a future Western Sydney TAFE Construction Hub makes Leppington an obvious choice. With the site of 283 – 293 Bringelly Road, Leppington previously identified via the planning process as a strategic opportunity to co-locate a VET institution with the Aerotropolis, this option is commended to DPIE for further investigation.

Health

There are potential adverse effects on health services through risks associated with airport development. People within healthcare facilities also tend to be disproportionately vulnerable to impacts such as noise and air quality, as reflected in *The Western Sydney Airport Plan and Environment Impact Statement 2015* (and in particular the Social Impact Assessment). Health care facilities are also identified as ‘sensitive social infrastructure’ more likely to be affected by impacts such as noise, social amenity, etc. but the specific health impact on these sensitive settings is not assessed. Council recommends that the *WSAP* responds to these issues, to ensure the provision of any health services provided in proximity to the Aerotropolis do not suffer any ill-effects resulting from location relative to the Western Sydney Airport.

Integration of Infrastructure Planning with the SWGA

“The most immediate step to integrating the planning for the Aerotropolis is to integrate its precinct planning with other growth areas”. (page 26 *WSAP – Stage 1 (2018)*). To achieve the intent of this statement may prove to be a significant indicator of the success (or otherwise) of urban planning in the future Western Parkland City.



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For example, the sequencing of land release and provision/coordination of supporting local infrastructure is one of the key elements in facilitating new housing. The experience of the Austral/Leppington North precinct has demonstrated a clear need for a collaborative approach between government, utility providers and landowners. With the *WSAP*, there is an opportunity for a more holistic approach to this process, particularly regarding adjacent precincts in the Camden LGA (**as per Figure 5 in this submission**).

As per the map below, spatially the Leppington centre will be the closest (geographically) strategic centre to the Western Sydney Aerotropolis. Planning for servicing infrastructure must be addressed concurrently with implementation of the *WSAP*, to mitigate any potential planning conflict between key centres – this is crucial if the hierarchy of centres identified for the Western Sydney Parkland City (via the *Western City District Plan*) are to thrive. Whether this is achieved via an integrated LUIIP between the Aerotropolis and SWGA, or an extended 'Place-based Infrastructure Compact' is a matter for DPIE. Either way, it must include the SWGA area, as it will significantly influence how urban development relative to the Western Sydney Airport is likely to evolve – whether in a lineal, supportive and structured way, or in contrast to efficient and effective development patterns.



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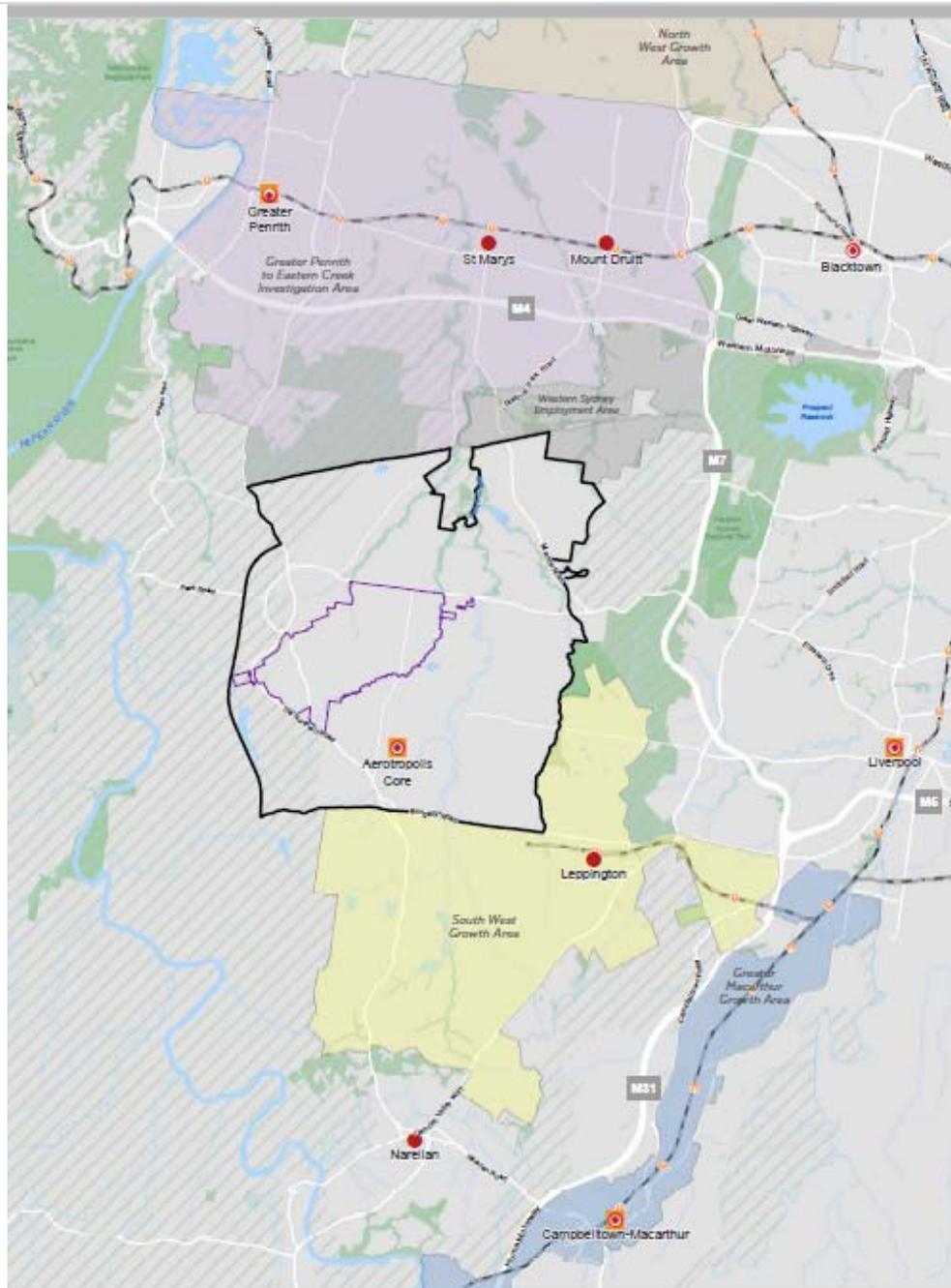
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Adjoining Areas

Western Sydney Aerotropolis

- | | | |
|--|---|---|
|  Western Sydney Aerotropolis |  Greater Penrith to Eastern Creek Investigation Area |  Metropolitan Cluster |
|  Western Sydney International (Nancy-Bird Walton) Airport |  South West Growth Area |  Health and Education Precinct |
|  National Parks and Nature Reserves |  Greater Macarthur Growth Area |  Strategic Centre |
|  Environmental Conservation |  North West Growth Area | |
|  Western Sydney Employment Area |  Metropolitan Rural Area | |



Figure 5 – Western Sydney Aerotropolis and surrounds (source: DPIE)

A Culture of Arts and Creativity

The *WSAP*'s vision for cultural infrastructure is that it supports tourism in Western Sydney, to provide a unique and exciting arts and cultural experience to help the night-time economy. It will seek to co-locate artistic and education precincts to encourage collaboration, drive enterprise and innovation, and support the development of creative industries.

Such a vision could in part be realised via integration with the SWGA, to serve the population of Western Sydney, including the Camden LGA. This could include performing arts, exhibition spaces for showcasing contemporary visual arts, craft and cultural heritage and studio spaces.



Performing Arts Facility (Sample Impression)

These amenities would play an important role in promoting community wellbeing in the region, by supporting and celebrating the artistic vibrancy of local, cultural and community identity. DPIE are encouraged to work collaboratively with Council and the community to further explore this vision, in creating cultural amenity in the Western Sydney Aerotropolis that enhances the liveability of Western Sydney.

4. Safeguarding the 24-hour airport

Council recommends that the Department of Planning, Industry & Environment:

- Through land-use planning via the *WSAP*, address the deficiencies in the Western Sydney Airport EIS regarding Aircraft Noise and Airport Ground Noise;
- Develop a comprehensive Safety Management Strategy/Plan for the Western Sydney Airport, supported through planning in the *WSAP*; and
- Ahead of the precinct planning phase, develop a structure plan of all water bodies throughout the *WSAP*/SWGA, to address the issue of wildlife strike.



Aircraft Noise & Airport Ground Noise

From an environmental perspective, the curfew-free operation of a Western Sydney Airport, 24 hours a day, 7 days a week, has the potential to impact Western Sydney.

The absence of defined flight paths and other airspace management strategies in the *WSAP* highlights a key concern for Council regarding the aircraft noise assessment. While it is evident the ANEC/ANEF contours impact the Camden LGA, the effect of flight paths used for the modelling may change at the time operations commence for Stage 1 of the Western Sydney Airport. This creates uncertainty as to the modelling presented and the assessment of what areas and how many people will be affected by aircraft noise. In addition, there has not been any sensitivity analysis that would give an idea of the implications that changes in flight paths would have.

Not having final flight paths and airspace design also limits impacts on the identification of appropriate mitigation methods, an aspect that had not been adequately addressed in the Western Sydney Airport EIS.

There has been no assessment quantified in the Western Sydney Airport EIS of the potential scale or severity of community annoyance that is likely to result in reaction to aircraft noise. Further work is required in developing the *WSAP* to adequately respond to all these issues.



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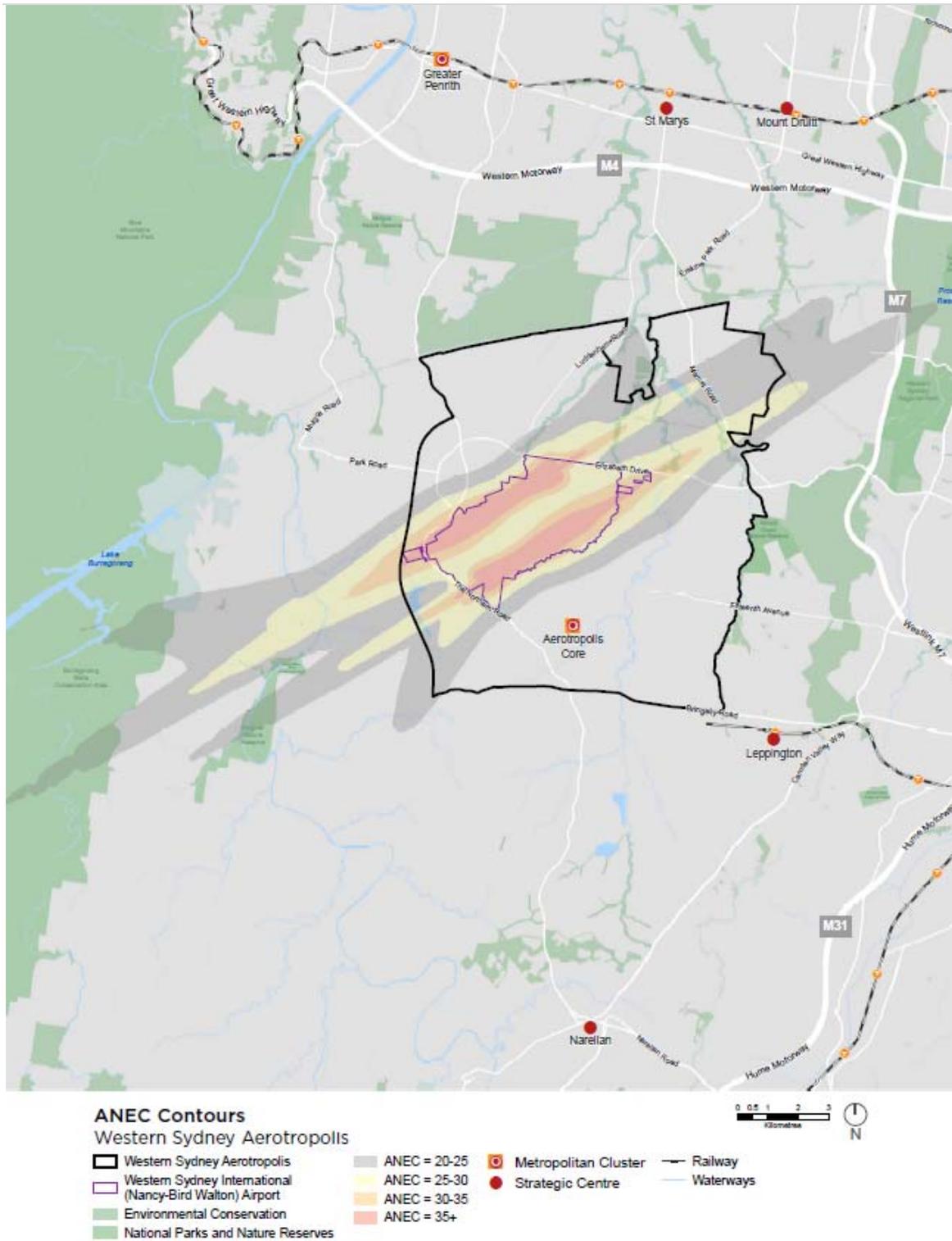


Figure 6 – ANEC Contours Western Sydney Aerotropolis (source: DPIE)

The Western Sydney Airport EIS includes exposed population statistics which provide a useful indication of the potential scale of the community who may be affected by aircraft noise to varying degrees. However, in isolation, this data does not provide an indication of the scale or severity of potential community reaction to aircraft noise levels as a result of annoyance.

The Health Risk Assessment in the EIS provides the most discussion of the adverse community impact, including references to research concerning the relationship between noise exposure and poor community health, but ultimately states that no quantitative assessment of these issues was conducted as part of the study. The scale of the proposed airport and the number of people potentially affected warrant further evaluation of the subject via the *WSAP*. The introduction of a new curfew-free international airport at a greenfield development site introduces a risk of wide-spread and prolonged community health concerns. A better understanding of this potential risk would be prudent to inform the *WSAP*, and the extent to which operational noise mitigation should be prioritised relative to other non-safety related airspace management considerations.

With regard to Airport Ground Noise, no consideration has been given in the *WSAP* to the cumulative noise impact from:

- Aircraft engine ground run-ups (particularly at night);
- Aircraft taxiing;
- The new M12 motorway;
- The realignment of the Northern Road;
- Internal and local road networks;
- A proposed Outer Sydney Orbital; and
- The Sydney Metro Greater West.

The EIS had not adequately addressed the need for a ground-based assessment of noise source levels, the type/magnitude of impacts and their cumulative effects.

No consideration has been given to the cumulative noise impact from all ground noise sources at the nearest noise sensitive receptors both with and without mitigation measures as required by the EIS Guidelines. Additional assessment should also be undertaken for other ground noise sources.

While the masterplan for the Western Sydney Airport precinct has not yet been released by WSA Co, there is currently insufficient evidence (as per the EIS) that many of the ground-based noise impacts will be adequately addressed. It is important that the *WSAP* responds to these issues, to ensure that all future land-use activities are conducive to mitigating adverse noise impacts on the areas immediately adjacent to the Western Sydney Airport (including the Camden LGA).

Aviation Safety

The safe operation of a Western Sydney Airport is paramount to the community most exposed to it, in the Western Parkland City. The *WSAP* must respond to this factor, in addressing issues that include:

- Early preservation of a corridor, and early construction of a dedicated pipeline to supply aviation fuel to the proposed airport site – to minimise risk associated with road-based fuel transport (and local road network congestion);
- The risks associated with fuel dumping, and the proximity of the proposed airport site relative to Sydney's primary water catchment area;
- Proximity of vital infrastructure to the proposed airport site, and indicative flight paths; and
- The impacts of safe operation of the proposed airport resulting from adverse weather conditions i.e. fog.

Public safety areas

As stated in the *WSAP*, “*the risk of aircraft incidents is highest at the ends of runways*” (page 48). This requires the need for modelling the trapezoidal area at the end of each runway, to ascertain the extent of the public safety area, in accordance with the ‘National Airports Safeguarding Framework’. This should occur ahead of the precinct planning phase, to fully disclose to the community as early as possible, the potential implications. Council notes that, as this work would have already been done as part of a risk analysis for the Sydney Metro Greater West and Outer Sydney Orbital projects, the relevant information should be made publicly available, ahead of the precinct planning phase of the *WSAP*.

Wildlife Buffer Zones

The issue of aircraft safety and wildlife strike is noted as of importance in safeguarding a 24-hour airport; while potentially less of an issue in ‘non-daylight hours’, seasonal migration of wildlife is of particular concern.

Council notes that the exhibited *WSAP*:

- Does not provide a clear definition of wildlife buffers;
- Does not provide a clear application of what controls apply to wildlife areas which extend into the Camden LGA; and
- Does not articulate the implications of wildlife buffers on the Planning of the Western Parkland City and Agribusiness Precinct (zoning and permitted uses).



The proximity and extent of the Wianamatta-South Creek catchment to the airport is of concern to Council, as to how far upstream (south) the wildlife buffer zones extend, **as depicted in Figure 7.**



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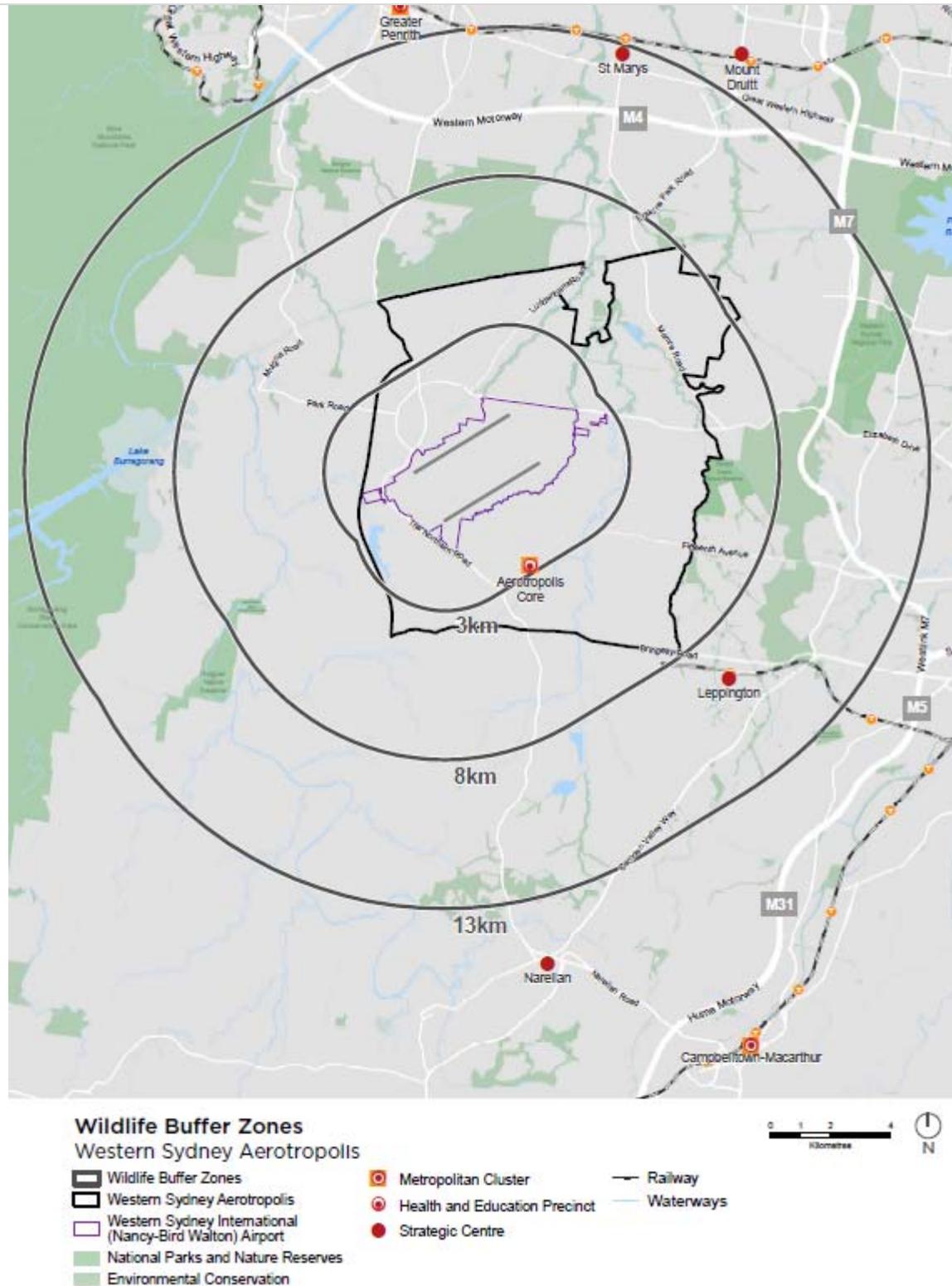


Figure 7 – Wildlife Buffer Zones: Western Parkland City (source: DPIE)

The *WSAP* states “*This may influence where dams, water bodies, wastewater treatment facilities, parks or biodiversity conservation sites are located. This will be addressed in precinct planning*”. (page 48)

Council strongly recommends that DPIE, in advance of the precinct planning phase in the *WSAP*, develop:

- A structure plan for the *WSAP/SWGA* depicting all significant dams, water bodies etc.; and
- A strategic plan for the Wianamatta-South Creek catchment, inclusive of the Camden LGA, that addresses issues such as wildlife strike.

5. Resilience and adaptability

Council recommends that the Department of Planning, Industry & Environment:

- Investigate and address the cumulative impacts of large-scale infrastructure projects on Air Quality and Visual Amenity in Western Sydney; and
- A holistic, assertive approach is needed to developing climate change resilience in the Western Sydney Aerotropolis.

Contemporary, Liveable Neighbourhoods – Visual Amenity, Air Quality.

As part of the implementation of the *WSAP*, the cumulative impacts of large-scale infrastructure projects in Western Sydney should be investigated.

The anticipated scale of the Western Sydney Airport (combined with other major projects such as the Sydney Metro Greater West) will be significant in transforming the existing landscape. It is essential therefore that appropriate steps are taken in planning for this change, including the investigation of appropriate mitigation measures fully utilised to limit adverse impacts on visual amenity, built form and urban design.

An integral part of the ‘Liveability’ for the future of Western Sydney, will be air quality.

While already a significant issue, air quality resulting from a second major airport within the Sydney Basin has long been a key point of concern for Council. The drafted Western Sydney Airport EIS did not adequately respond to what has the potential to undermine the health of the entire Western Parkland City. It is the responsibility of the Australian and NSW Governments to effectively communicate the scale of the population affected by issues such as air quality, and other significant issues, so that a quantitative and qualitative assessment of the combined impacts to our community may be determined.

Climate Change Resilience



The *WSAP* notes the following on page 53:

“The effects of climate change pose challenges to ecosystems, communities and economy. All three levels of government have adopted mitigation and adaption policies that acknowledge the need to plan for climate change”.

Given the experience of recent extreme weather events in Australia, including Western Sydney, there is a need for an emphasis on more than a business-as-usual approach to climate resilience and adaptability.

In this regard, Council acknowledges the *WSAP*'s establishment of low carbon precincts at the precinct planning and masterplanning stages. However, it is important that this approach flows through to standards and controls set out in the SEPP and DCP.

More needs to go into planning for climate change resilience for the Aerotropolis and the broader Western Parkland City. A climate risk assessment should be undertaken to inform the planning of climate change resilience , to be reflected in the SEPP and DCP.

For example, **as depicted in Figure 8**, Council's *Draft Local Strategic Planning Statement 2019* will work to identify the potential risks associated with a changing climate through a climate risk assessment and identify priority issues for Council and the community.



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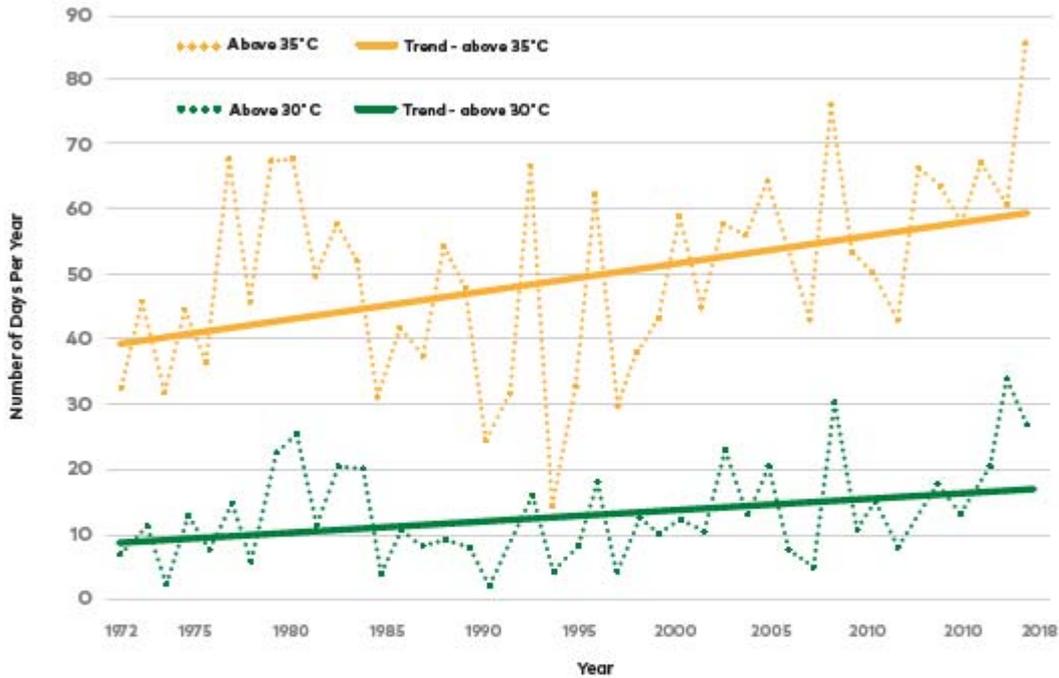


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Number of days in the Camden LGA above 30°C and 35°C



Sustainability

Actions

- Council will undertake a climate risk assessment and identify priority issues for Council and the community – **Short Term**
- Council will investigate a Community Garden and Urban Food Policy to encourage local food production – **Short Term**
- Council will review planning controls related to flood prone land – **Short Term**

Figure 8 – Local Priority S6: Improving Camden’s resilience to natural hazards and extreme weather events (source: Draft Camden LSPS)

6. Precinct planning

Council recommends that the Department of Planning, Industry & Environment:

- Develop a staged plan for precinct/land release in the Western Sydney Aerotropolis, supported by a coordinated infrastructure program – out-of-sequence development arrangements should not occur; and
- Engage with Council in a collaborative approach to integrated land-use and infrastructure planning between the southern precincts in the Western Sydney Aerotropolis, and adjacent precincts in the Camden LGA e.g. South Creek West.

Out-of-sequence development arrangements

A critical point to confidence in the development industry is the degree of plausible certainty for all its core business elements e.g. availability/access to developable land, cost/access to finance, timing for approvals, value of development costs/levies etc. A sustained threat to any of these elements may place at risk the appeal for investment into the sector.

As part of this issue, the provision of ‘out-of-sequence’ development arrangements depicted in the *WSAP* presents as one such potential risk. Land/precinct release out-of-sequence may result in fractured infrastructure delivery, which would in turn undermine confidence of other landowners/developers, resulting as an impediment to orderly development.

In the majority of large, private residential/commercial development projects, a developer will establish a structured staging plan; an orderly approach to what land development is to occur where and when, supported by infrastructure. This approach provides certainty for the developer (and ultimately their customers) in delivering their development in a structured way.

Enabling out-of-sequence development arrangements also places a considerable strain on local government and other key stakeholders e.g. Transport for NSW, Sydney Water etc regarding the provision of supporting infrastructure. For example, the experience to date in the SWGA is one of dis-connected, isolated precinct land release, that has stretched infrastructure provision both spatially and financially. A structured and staged approach to the Western Sydney Aerotropolis would circumvent the outcomes experienced in the SWGA, achieving efficiencies through economies of scale, coordinated provision etc. The means to deliver this approach under a single agency/authority is explored in the following section 5. *Funding, coordination & delivery of infrastructure.*

Integrated planning between the Aerotropolis and the Camden LGA

As noted previously in this submission, planning of the Aerotropolis should not be undertaken in isolation of the extensive development happening in the rest of the Western Parkland City. This includes those areas immediately to the south of the Aerotropolis, adjoining the northern boundary of the Camden LGA.



Figure 9 – Interface between the Western Sydney Aerotropolis and the South West Growth Area/Camden LGA)

As depicted in **Figure 9**, there is an extensive interface along Bringelly Road, between the Western Sydney Aerotropolis and the northern area of the SWGA/Camden LGA. This proximity provides an opportunity for DPIE to work collaboratively with Council on an integrated approach to land-use and infrastructure planning between the two areas, with the objective of seamless planning outcomes across the Western Parkland City.

7. Infrastructure funding and provision

Council recommends that the Department of Planning, Industry & Environment:

- In collaboration with the Greater Sydney Commission, integrate the planning for local developer contributions into the 'Place-based Infrastructure Compact' initiative; and
- Conduct a concurrent review of funding strategies, including a value capture mechanism, to facilitate financially sustainable infrastructure.

Place-based Infrastructure Compact

Council commends the NSW Government for its integrated infrastructure planning approach via the 'Place-based Infrastructure Compact' (PIC) initiative, as piloted recently in the Greater Parramatta and the Olympic Peninsula. The PIC process facilitated by the GSC should pioneer a new approach to the coordinated/sequenced provision of infrastructure, in support of development in the Aerotropolis.

However, to provide a holistic infrastructure plan via the PIC, it is important that local developer contributions are included. While the *WSAP* makes the statement *"The process will consider funding sources for the infrastructure and services identified, including from the NSW and Australian Government, State infrastructure and local developer contributions..."* (page 84, *WSAP*); Council is of the understanding, as an active participant in preparing the PIC Area #1 (Aerotropolis, Leppington, Edmondson Park, Glenfield), that local developer contributions are not part of the PIC process. In this regard, it is recommended that DPIE liaise further with the GSC, and collaborate with Council, to include local developer contributions as part of the PIC in developing the *WSAP*.

Infrastructure Funding

The local contributions planning system in NSW needs significant review. The existing contributions planning framework has been in place since 2005 (enshrined in legislation dating back to 1979).

The current system removes the ability to collect for key local infrastructure items considered 'non-essential', thus restricting Council from being able to levy contributions for many types of community infrastructure.

With the introduction by the NSW Government of the Special Infrastructure Contribution (SIC) levy during the same timeframe, development industry response to the infrastructure funding framework has not been altogether positive. Regarding funding for the *WSAP*, this highlights the urgent need for a holistic, integrated reform of infrastructure funding legislation – including a 'value capture' mechanism as part of the solution. As noted in the Australian Government's 2016 discussion paper on value capture:

"When new or improved infrastructure is delivered by governments, many different groups benefit. However, when the project is funded by governments entirely out of general taxation revenue, all taxpayers share the burden of paying for the infrastructure – even though many of them will not use or directly benefit from it.

By identifying and quantifying the value created from the development of the new infrastructure, and connecting it with the costs of the infrastructure, value capture mechanisms can help governments deliver projects through a fairer model. By better linking projects and beneficiaries, this approach can also encourage better land use planning and improved infrastructure investment decision-making".

(Using Value Capture to Help Deliver Major Land Transport Infrastructure Discussion Paper 2016)

As part of the holistic review of infrastructure funding, consideration is required for the funding of maintenance on local infrastructure, to mitigate adverse impacts resulting directly from the Western Sydney Airport. Notwithstanding ongoing upgrades to the Northern Road and Bringelly Road as part of the Western Sydney Infrastructure Plan works program, other parts of the Camden LGA road network will be the subject of significant volumes of heavy vehicle traffic movements, required as part of construction of the Western Sydney Airport, delivery/removal of materials etc.

The anticipated adverse impact on local roads highlights the need for an infrastructure funding system, inclusive of a mechanism to facilitate restorative measures to Council's existing asset base, as a direct result of the construction of the Western Sydney Airport.

Western Sydney Aerotropolis – Draft SEPP Discussion Paper

Following are comments in response to the *Draft SEPP Discussion Paper*, for the Western Sydney Aerotropolis.

SEPP Maps

- Revise the 'Precinct Boundary Map' to amend the boundary of Agribusiness Precinct and Dwyer Road Precinct (as per the points made earlier in this submission, under 2. *Implementing the vision – Agribusiness – Dwyer Road precinct*);
- Revise the Flood Maps to capture 1-in-100, 1-in-20 and PMF;
- Revise the Land Zoning Map to amend the Agribusiness zoning further south to Bringelly Road, with regard to the Metropolitan Rural Area;
- The Land Reservation Acquisition Map identifies only a portion of South Creek to be acquired for environment and recreation purposes. The area identified needs to be justified in terms of its population servicing. Open space provision needs to be looked at more cohesively for the Aerotropolis;
- The Lighting Intensity and Windshear Map will affect parts of the Camden LGA. These maps should provide guidance on the implications on future development in the SWGA; and
- The Wildlife Buffer Zones Map affects planning for the SWGA, South Creek West Release Area and Cobbitty and Harrington Park. The SEPP specifically identifies that it will affect landscape design guidelines and building design and siting which

will affect the DCP's for these areas, including Leppington. The Planning Package should provide detailed guidance on this matter.

Part 2 – Proposed State Environmental Planning Policy

- In reference to page.4 / 2.3 *Zoning Approach* in the Discussion Paper - this section specifies two SP1 zones including SP1 Special Activities (Airport) Zone and SP1 Special Activities (Commonwealth Zone). Clarification is sought as to whether these zones are the same – and if not, recommend further clarification in the Draft SEPP as to how they're differentiated;
- In reference to page.4 / 2.4 *Integrated Water Management Strategy* in the Discussion Paper – the Plan mentions the South Creek Sector Review and Western Sydney Regional Master Plan 2020, as the key documents that will inform these provisions. Council notes it is not possible for stakeholders to provide comment on this, when these two documents have not yet been made publicly available; and
- In reference to page.6 / 2.8 *Infrastructure funding arrangements* in the Discussion Paper – the Plan identifies the investigation of value capture mechanisms and this should also be considered in the drafting of infrastructure funding provisions of the SEPP (as noted earlier in this submission, in item 7. *Infrastructure funding and provision*).

Part 4 – Precinct Specific Controls

- It is recommended there is a clearer discussion on expectations around density in each of the precincts. For example, Planning Principles regarding the development of the Wianamatta-South Creek Precinct needs to emphasise the appropriate location of higher densities around green/transport infrastructure. This is referred to in the vision but not reflected in the principles.

Part 8 – Planning Pathways

- Regarding item 8.3 *DAs submitted prior to precinct planning* (page 32) – DA's submitted prior to precinct planning being finalised, should also be required to be consistent with any draft precinct plans that are publicly available; and
- Regarding item 8.5 *Complying and exempt development* (page 33) - Given that the identified zones in the Aerotropolis do not align to the zones in the Standard Instrument, there should be clear provisions around the applicability of the Codes SEPP which only applies to certain zones.