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Dear Ms Van Laeren

Penrith City Council submission on Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan

Thank you for the opportunity to comment on the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan (LUIIP). Broadly speaking, Council aligns with the Government's vision for the Aerotropolis including the strong focus on additional jobs for Western Sydney residents, transformative corridors for major transport and green infrastructure, and an innovative approach to the way the area will be governed.

In acknowledging the LUIIP as a discussion paper to outline the Government's intentions for the development of the Aerotropolis, Council is looking to work closely with Department of Planning and Environment (DP&E) in preparing Stage 2 of the plan. This process must move quickly with a focus on finalisation of the LUIIP to its implementation. As a result, there is a need to quickly establish the Planning Partnership and the future planning framework considering the key role the Planning Partnership will have in the planning for the Aerotropolis.

Council congratulates DP&E for the community consultation undertaken to date and for welcoming our involvement as an opportunity to hear first-hand from our residents, landowners and stakeholders. It is our belief that the planning and implementation of the Aerotropolis must be based firmly on the principle of ongoing and genuine collaboration between governments in order for it to reach its full potential and bring transformative change to Western Sydney.

Council's submission is attached to this letter for your consideration. Should you wish to discuss the matters raised in this submission further, I can be contacted on (02) 4732 7777.

Yours sincerely

Natasha Baker
City Planning Manager

Penrith City Council submission on Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan

Infrastructure delivery

Council is of the view that the success of the Western Parkland City relies almost exclusively on the success of North South Rail, with the Western Sydney Airport acting as an accelerant to the transformation of the region. For the Western Sydney Airport to reach its potential, the finalisation of major transport corridors that the Aerotropolis relies upon, must be prioritised and move from being a concept to a reality. We reinforce that the North South Rail line must be operational from day one of the opening of Western Sydney Airport.

The delivery of services is critical to all early stages of planning within the Aerotropolis, therefore the DP&E need to ensure relevant agencies align their long term business activities with the staging outlined within the LUIMP to enable timely development and investment. This is particularly important for the management and recycling of water along the South Creek corridor.

The LUIMP is limited in its description of infrastructure and servicing beyond the identification of transport corridors already announced by the NSW Government. Further information and a commitment to the delivery to key infrastructure and services must be provided in Stage 2 LUIMP to provide certainty to landowners, investors and the business community. This information should also include reference to other proposed corridors including the Southern Link Road. Timeframes for their planning and delivery which correlate with the timeframes outlined in the LUIMP for the rezoning of land and initial precincts should also be identified.

In progressing the LUIMP and in the preparation of the Stage 2 LUIMP, a clear road hierarchy including arterial roads needs to be established, accompanied by an associated funding framework.

The Government must also consider the timing of social and cultural infrastructure to ensure the Aerotropolis has a sense of place and level of amenity worthy of a greenfield airport city to support workers, residents and visitors. This must include planning for health, education, cultural and recreational facilities upfront in the process, as opposed to retrofitting these facilities once the Aerotropolis is developed.

The challenges of funding this infrastructure is acknowledged, however the Government is encouraged to consider innovative broad-ranging responses to the funding of infrastructure, including consideration of value-sharing options.

South Creek precinct

Council strongly supports the vision for the Western Parkland City with the role of South Creek forming a cool and green spine as a defining element. It is recognised that the South Creek corridor has multiple functions including recreation, amenity, tourism and water management in addition to its significant role in forming part of the green grid for the Western Parkland City and across Greater Sydney more broadly.

However Council does not support, based on current information, the use of Probable Maximum Flood (PMF) to define the final edge of the South Creek Precinct. PMF is an anthropogenic measure used for an entirely different purpose to that which it is being applied to in the case of the South Creek precinct.

It is not accepted, on the basis of the briefings that we have received, that PMF is by any means an appropriate measure to use for the purpose of defining a green grid or urban heat island outcome, or as a future planning level. It is our view that the spatial footprint of the South Creek Precinct should be defined by either environmental or by urban and natural water management studies, not by PMF.

Given the uncertainty the application of the South Creek precinct boundary has created, the DP&E must provide further clarity on the proposed boundary, including the exhibition of any supporting technical studies of the South Creek precinct to better understand the intention and future zoning and land uses of this precinct, including future ownership, acquisition and ongoing management.

Northern Gateway precinct

The focus on the Northern Gateway precinct as the northern entrance to the airport and as an initial precinct to be rezoned is welcomed and supported. The Northern Gateway precinct is critical in supporting the business case for North South Rail and will be central to the emerging Western Economic Corridor, therefore its significance to the Aerotropolis and Western Parkland City should be acknowledged.

Future land uses within this precinct should be aligned to the strategic value of the location and match those in the Aerotropolis Core. The existing zoning of the Sydney Science Park needs to be considered in the context of the new planning framework to ensure that existing land uses, provisions and development consents still apply as this initial centre continues to develop.

Council also strongly believes that there should be no caps placed on the number of jobs or dwellings within the precinct as they could be perceived as a restriction or limitation to the growth of the precinct. We believe that residential development can enhance and assist in the creation of place within the Aerotropolis, however as the North South Rail line is critical to the Western Sydney Airport's success, more detailed planning work around the business case for North South Rail and future station locations will need to consider the role of residential development within centres.

Aerotropolis Core precinct

The LUIIP identifies the Aerotropolis Core precinct as the central city at the core of the Aerotropolis' activity around the Western Sydney Airport. Whilst it is recognised that there is a need for a centre to be located adjacent to or directly within an airport to complement and support on site airport-related activities and industry; the proposed size, volume, land uses and narrative around the proposed Aerotropolis Core has the potential to dilute other centres

within the Aerotropolis and potentially disadvantage Penrith, Liverpool and Campbelltown's opportunities for growth.

Council believes that opportunities for higher value employment uses should be dispersed equally and flexibly within the Aerotropolis itself, not just the Aerotropolis Core precinct.

Staging of the initial precincts will therefore be crucial to ensure the Aerotropolis is not competing against the other centres within the broader Metropolitan City Cluster, and that strategically and well-located land, other than just the Government's, facilitates a range of opportunities, including high value employment, cultural, recreational, health and tertiary uses and place-making opportunities.

Residential development

Council is firmly of the view that there is a need to future-proof Western Sydney Airport by ensuring compatible, predominantly employment-related land uses that do not impact on the growth and success of Western Sydney Airport.

However we are also open to the permissibility of residential development within the Aerotropolis, particularly where it assists in place-making, where it supports the delivery of city-shaping infrastructure such as North South Rail and where the land is free from noise, odour or other health-related impacts. Council does not support the application of arbitrary exclusion zones without any supporting technical studies or evidence base.

Further to this, the quantum of residential development within the Aerotropolis and particularly the Aerotropolis Core precinct should also be carefully considered to ensure the growth of Penrith and Liverpool as higher density city centres within the Metropolitan City Cluster. With 8,000 dwellings projected for the Aerotropolis Core, this is a significant number considering its proximity to Penrith City Centre, St Marys Strategic Centre and planned and future growth areas within adjacent local government areas which may compete with, instead of support, the other centres within the Metropolitan City Cluster.

It is recommended that Penrith, DP&E and Liverpool City Council work together prior to the finalisation of the Stage 2 LUIP to find an appropriate residential balance.

Planning Framework and Governance

The LUIP recognises, and Council agrees, that a flexible planning framework is required to govern the future development of the Aerotropolis particularly due to the growth and development of the Aerotropolis over the long term. However it has become evident that the proposed planning framework and the timing of its implementation is not yet well understood.

Council believes that there is a need to better understand the role of precinct plans and master plans before determining if the application of the Urban Development Zone is the right approach, however acknowledges that there is a need to facilitate ongoing amendments in an efficient and orderly way. Therefore, further clarity is sought in this regard as part of the Stage 2 LUIP.

It is also recommended that the proposed State Environmental Planning Policy be released for public exhibition with an opportunity to review and provide feedback on its content. This would assist in better understanding the proposed planning framework as well as provide Council the opportunity for input.

Further clarification is sought on the role and responsibilities of the Western City and Aerotropolis Authority (WCAA), given the recent introduction of the *Western City and Aerotropolis Authority Act 2018*. The Stage 2 LUIIP could further explain and better visually demonstrate the role of the WCAA and Planning Partnership in the planning, implementation and delivery of rezoning proposals, precinct plans, master plans, and development of private and government-owned land.

Out-of-Sequence proposals

Council supports the approach to out-of-sequence proposals given the crucial role of the staging of future rezonings to ensure the Aerotropolis' success over the long term. Out-of-sequence proposals must only be considered where high-value jobs are the primary outcome, where proposals maximise full utilisation of infrastructure, invest in new infrastructure particularly where there are value-adding opportunities, or where key sites are in single ownership. While not distracting from orderly and accelerated roll-out of the area via the initial precincts, key sites in single ownership and servicing capability should be considered in a timeframe equal to those initial precincts where it can be demonstrated consistency with the out-of-sequence criteria. The LUIIP also needs to demonstrate that land being rezoned as part of the initial precincts is sufficient to meet the demand in the short to medium term.

There is also a need to facilitate airport-related construction activities such as accommodation for temporary workers and other service-based land uses to support future workers. It is recommend the DP&E consider interim and temporary uses on land close to the Western Sydney Airport site that supports the construction activities of the airport and other major infrastructure projects. These uses must not jeopardise the future use of the land, and could be implemented with a time-lapse consent.

Council also believes there is merit in further research on special manufacturing areas/zones being created in the LUIIP, particularly in response to anecdotal evidence suggesting an increasing demand for smaller and more specialised industrial uses.