

01 November 2018

Director, Aerotropolis Activation
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Re: Submission to the draft Land Use and Infrastructure Implementation Plan for the Western Sydney Aerotropolis relating to land in Bringelly

1. Introduction

This submission has been prepared on behalf of the Aerotropolis Agribusiness Action Group (AAAG) to provide comment on the draft Land Use and Infrastructure Plan (draft Plan) for the Western Sydney Aerotropolis.

The AAAG is a community group representing 182 residents in the Bringelly area. The full list of residents supporting this submission is provided at **Appendix 1**.

The AAAG generally supports the vision for a Western Sydney Aerotropolis but is concerned that the proposed Agriculture and Agribusiness Precinct is too restrictive in its vision and fails to account for the key differences in site characteristics.

The AAAG proposes the creation of a "Southern Gateway Precinct" containing a flexible mix of employment uses not necessarily limited to agriculture-related operations. Subject to discussions with DP&E, further investigations would be undertaken and more detailed vision for the land would be proposed.

This submission provides the following information:

- site description;
- review of the draft Plan including key objections; and
- recommendations for amending the Plan prior to finalisation.

2. The Site

The site comprises an area of approximately 65ha bounded by The Northern Road to the north and east and by Greendale Road, and extending just past Dwyer Road to the west. Refer to Figure 1 and 2 below.

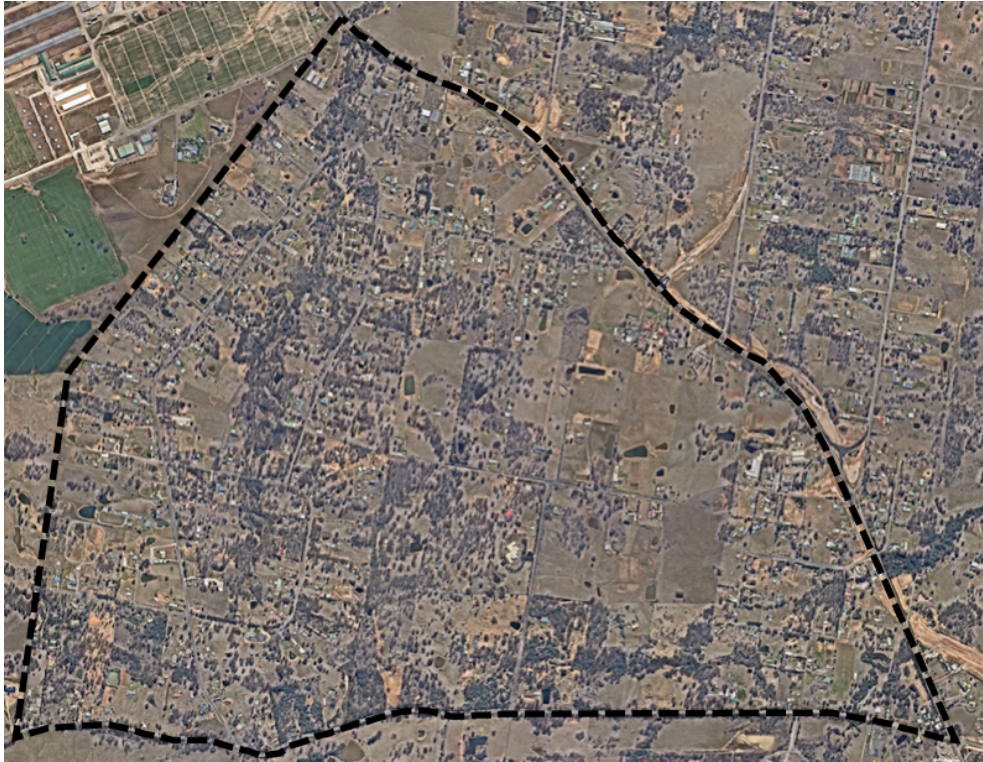


Figure 1: Site Aerial Photograph (Source: Nearmap)

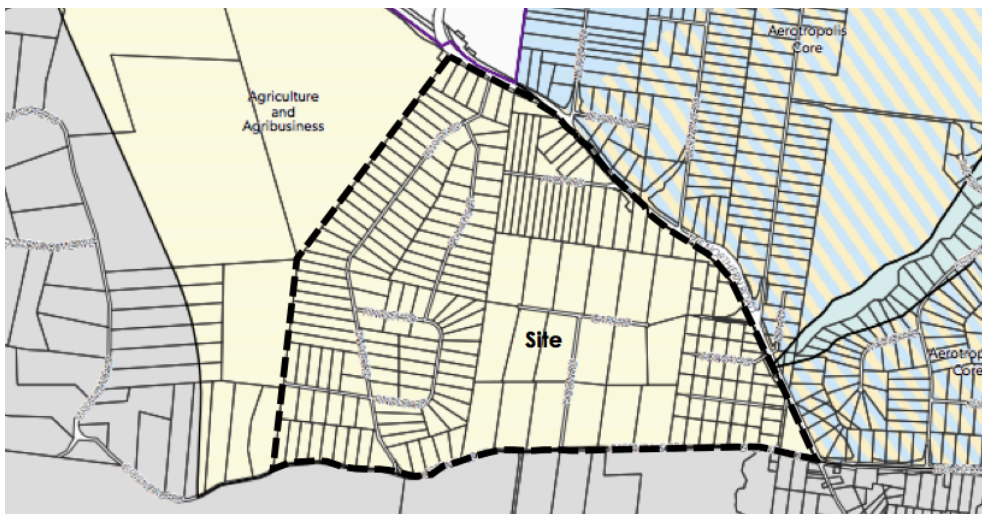


Figure 2: Lot Boundary Map (Source: DP&E)

The site's key site characteristics are outlined below:

- **Current zoning:** The site is zoned part RU4 Primary Production Small Lots and part R5 Large Lot Residential.
- **Lot pattern:** The site comprises a mixture of lot sizes, primarily ranging from 1.2ha to 2ha, with a group of 10ha lots towards the centre of the site. These lots are distinctly smaller than the large landholdings to the west and northwest.
- **Current uses:** The site accommodates a mix of land uses, primarily dwelling houses and small businesses. Most lots within the site have dwelling houses, and a multiple lots have dual occupancies. There are currently no agricultural operations, as confirmed by ABN data and by residents.

According to ABN data, there are **1,144 active businesses** in the Bringelly postcode (2556), and, based on aerial imagery, it is apparent that the large majority of these are located within the site. Specific uses within the site include but are not limited to:

- multiple dwelling houses;
 - multiple dual occupancies;
 - multiple trucking/freight and transport businesses;
 - multiple excavation and earthmoving businesses;
 - prefab transportable homes;
 - child care centre;
 - outdoor adventure fitness centre;
 - hairdressers;
 - pet boarding kennels;
 - greyhound trainers;
 - panel-beating;
 - hospitality supplies and delivery
 - crane operators;
 - concreting;
 - fencing contractors;
 - tradesman (electricians, plumbers, building /construction);
 - light manufacturing;
 - lawn mowing/landscaping businesses; and
 - lawn mowing/outdoor equipment service/repair.
- **Surrounding land uses:** The site is surrounded by future urban land to the north/northeast (Aerotropolis Core), residential land to the east (Kelvin Park), future residential land to the south (South Creek West) and rural agricultural land to the west/northwest.
- **Transport infrastructure:** The site is well connected to current and future transport infrastructure, including:
 - The Northern Road, an arterial road, borders the site to the north and is currently being upgraded to two lanes each way along this section.
 - The intersection of The Northern Road and Bringelly Road is being upgraded to a grade separated interchange (overpass).
 - Greendale Road, a B-double route, borders the site to the south.
 - The future M9 Outer Sydney Orbital will run north-south less than 1km to the west of the site and will include an exit at Greendale Road.
 - The planned North-South Rail Link will run parallel to The Northern Road (to the north of the road) in the vicinity of the site.
- **Ecology:** The site as a whole is not significantly constrained from an ecological perspective. Only marginal portions of the site, namely along Badgerys Creek and Bardwell gully, are identified in Liverpool Local Environmental Plan 2008 as "environmentally sensitive land".
- **Flooding:** No portion of the site is identified as flood prone land.
- **Bushfire prone land:** Minor portions of the site, namely the southern and northwestern portions, are identified as bushfire prone land.
- **Agricultural soils:** Based on a review of the Liverpool Rural Lands Study 2012, the majority of Bringelly is characterised as Class 3 soil category, meaning it has moderate agricultural capacity (Class 1 being optimum for agriculture).
- **ANEF restrictions:** The site is affected to a minor extent by ANEF restrictions associated

with the future Western Sydney Airport, with only the western portion of the site affected by the 20-25 ANEF contour.

3. Review of Draft Land Use and Infrastructure Implementation Plan

The draft Plan identifies the site as forming part of the Agriculture and Agribusiness Precinct, as shown in the figure below. DP&E's vision for the precinct and our key objections to that vision are discussed below.

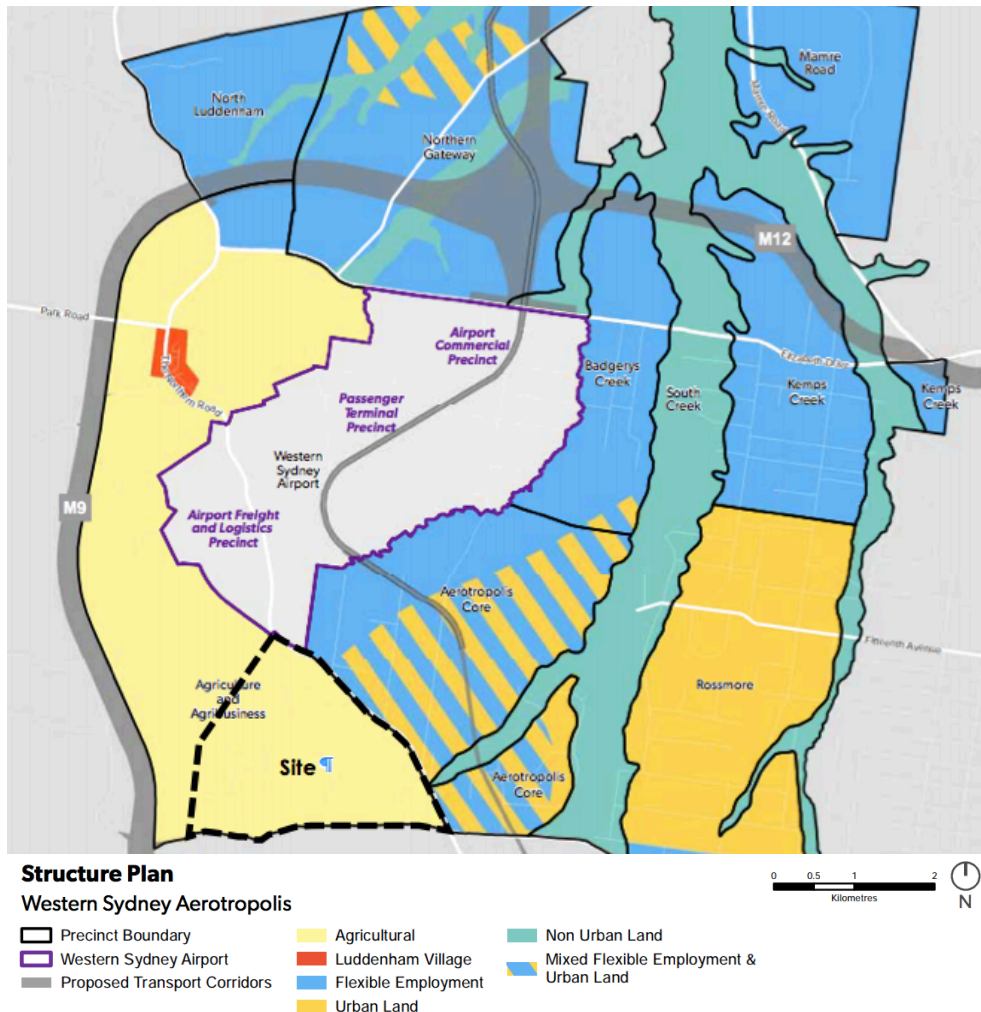


Figure 3: Aerotropolis Draft Structure Plan (Source: DP&E)

3.1 Overview of Agricultural and Agribusiness Precinct

The draft Plan states that the Agricultural and Agribusiness Precinct will “support the long-term retention and growth of agriculture and agribusiness in the Western City”. The precinct will build on current agricultural operations, accommodate new agricultural opportunities and capitalise on international demand for fresh food.

The following are identified as key features of the precinct:

- reliable water supplies;
- good soils;
- available farm labour;

- proximity to markets; and
- compatibility with airport operations.

The draft Plan nominates the following potential land uses for the precinct:

- ongoing agriculture production such as dairying and poultry farming;
- intensive horticulture such as mushroom and tomato farming;
- food processing; and
- food research and technology.

The draft Plan also identifies that an “agri-port” will be located within the precinct, with the size and location to be determined after a feasibility study prepared by the Department of Primary Industries (DPI).

3.2 Key objections

We have identified a number issues with the proposed Agriculture and Agribusiness Precinct:

Overly broad-brush approach:

The Agriculture and Agribusiness Precinct covers hundreds of hectares and contains land of varying characteristics and constraints. While we appreciate that the draft Plan is a high level document, with more detailed precinct planning to follow in the future, we are concerned that the precinct boundaries suffer from an overly board-brush approach and lack sufficient justification.

For example:

- As noted in Section 3.1 above, “good soils” are named as a key feature of the precinct. However, the quality of the soils throughout the precinct varies. Based on the Liverpool Rural Lands Study 2012, we understand that the subject site is classified as mostly Class 3 soils (moderate agricultural potential), while the land to the west and northwest, around Greendale and Wallacia, is classified as Class 1 and 2 (high agricultural potential). These differences in soil quality should be considered in the final drawing of the precinct boundaries.
- “Compatibility with airport operations” is also identified in the draft Plan as key characteristic of the precinct. It is assumed that this refers, at least in part, to aircraft noise. Areas subject to harsh aircraft noise are not suitable for residential or other sensitive land uses and are better able to accommodate agricultural and other less sensitive uses. Based on ANEF maps provided in the draft Plan, it is clear that only a portion of the precinct would be seriously affected by aircraft noise. The subject site would only be affected to a minor extent—only the western/northwestern edge would be affected by the 20-20 ANEF contour (lowest noise). These differences in ANEF restrictions should also be considered in the final drawing of the precinct boundaries.

Uncertainty around land uses:

There appears to be a good deal of uncertainty around the future land use/development outcomes in the Agriculture and Agribusiness Precinct—both among local stakeholders and within government. The term “agribusinesses” has not typically been applied in the context of a large-scale rezoning or structure plan, and draft Plan contains limited information about the intended development outcomes.

This lack of clarity is disrupting residents' current transactions and future plans. We have confirmed multiple reports of investors retreating from the area following release of the draft Plan due to uncertainty around development outcomes. A local real estate agent has advised that investor interest has "come to a standstill", see copy of letter received from a reputable real estate agency established in the area for nearly 20 years in **Appendix 2**. Detailed evidence on investor retreat can be provided if required.

Furthermore, as illustrated in the letter at **Appendix 3**, some investors have explicitly advised that they would be interested in the area subject to the zone incorporating a more flexible mix of land uses.

Additionally, there is a lack of certainty around timing for rezonings. In order to ensure a clear, transparent planning process, there should be a plain timeframe and steps outlining future rezonings.

Potential sterilisation of land:

We are concerned that the vision for the Agriculture and Agribusiness Precinct is overly ambitious and economically unviable. New-age farms and agribusiness may in fact be important components of the future Aerotropolis, but it is far from clear that the full extent of land set aside for these purposes will be necessary. Some land within the precinct may develop as envisioned, but some land, due to variations in location and site characteristics, may become sterilised—unsuitable for agriculture and agribusiness and unable to be developed for other useful purposes due to the zoning.

We believe the subject site may become one such sterilised area given its sub-optimal agricultural capacity and lack of large landholdings and current agricultural operations. This sterilisation may result in a large area of unsightly, unmaintained rural land in close proximity to the new airport. Such an outcome would detract from the urban amenity of the Aerotropolis and fail to align with the strategic vision of the Aerotropolis as a catalyst for economic growth.

The area may also miss on opportunities such as sewerage, water and NBN due to lack of development interest.

Lack of quantitative analysis:

Related to the above point, we believe that current boundaries of the Agriculture and Agribusiness Precinct lack sufficient quantitative justification. The draft Plan contains no evidence on the precinct's economic viability or necessity. As such, we consider the boundaries in the draft Plan to be prematurely drawn. We are particularly concerned about the site's inclusion in the Agriculture and Agribusiness Precinct given that the site currently accommodates no agricultural uses and has sub-optimal agricultural soils.

Summary of objections:

In consideration of the above points, we believe that the Agriculture and Agribusiness Precinct as proposed in the draft Plan is premature and ill-conceived. It neglects the unique characteristics of the site that make it unsuitable for agriculture, and it would leave the site indefinite a holding pattern, ostensibly part of the new Aerotropolis but lacking in redevelopment potential. Such an outcome would run contrary to the strategic vision for the Aerotropolis as a catalyst for economic growth.

4. Recommendation

We propose the creation of a **Southern Gateway Precinct**. It is envisioned that the precinct would function as a key centre at the airport's southern interface that would accommodate a range of employment uses with links to food production and processing. Similar to the Northern Gateway Precinct, uses in the Southern Gateway Precinct would include:

- food production and processing;
- food technology and research;
- agribusiness;
- warehousing and logistics;
- complementary offices and retail; and
- some residential.

The proposed Southern Gateway Precinct is shown in the modified Structure Plan below.

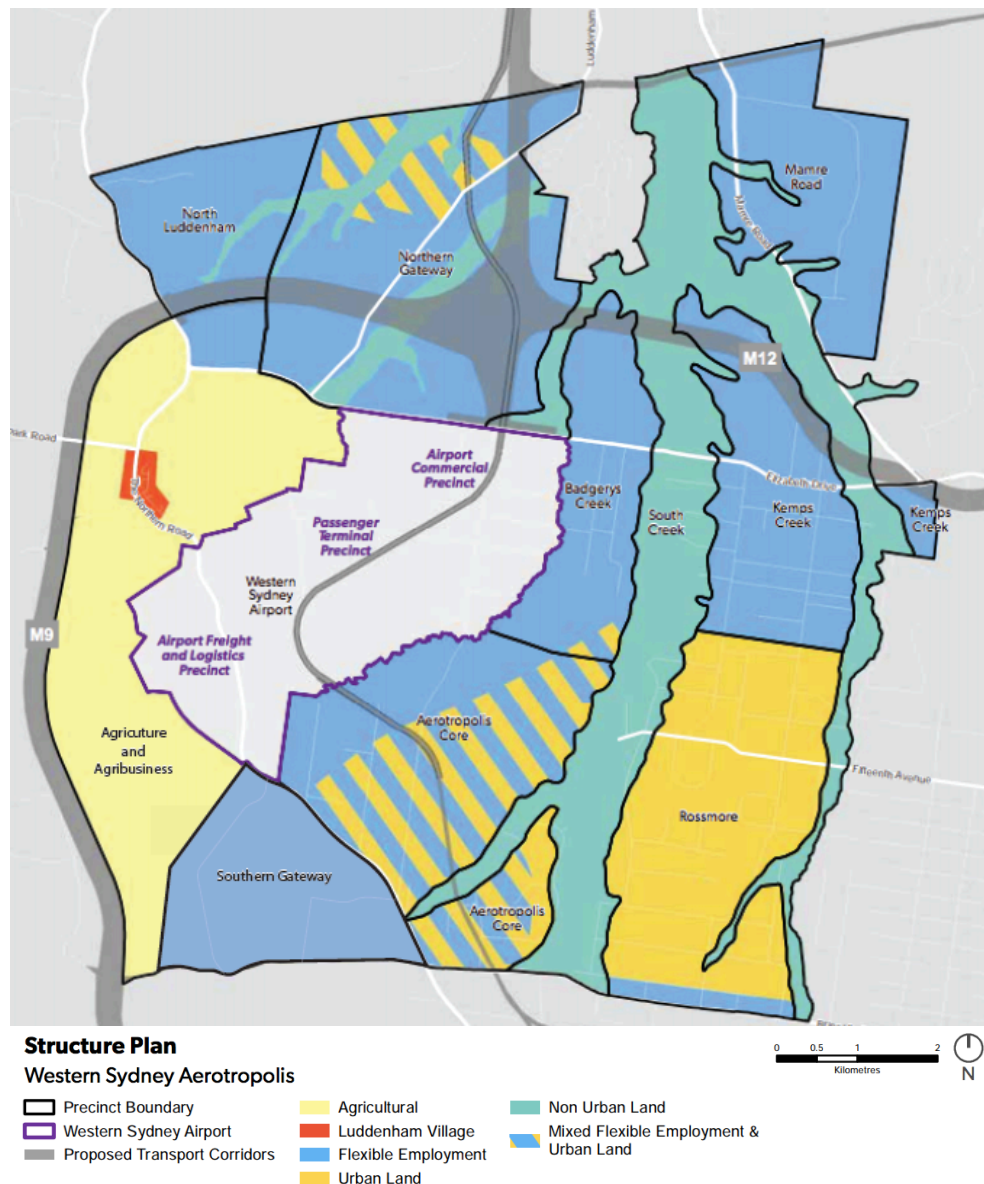


Figure 4: Proposed Structure Plan (Source: DP&E; modified by Mecone)

4.1 Key factors

The key factors contributing to our recommendation for a Southern Gateway Precinct are outlined below.

Lack of major development constraints:

The land is not flood-affected and is not significantly constrained from an ecological or bushfire perspective. As such, the land can be redeveloped quickly, efficiently and flexibly. Furthermore, the land is affected by ANEF restrictions only to a minor extent, which means it is suitable for other non-agriculture uses.

Sub-optimum agricultural soils:

The site's soils have only moderate agricultural capacity (Class 3), which means that there would be no major opportunity cost from an agricultural perspective if the site were developed for non-agriculture purposes.

The land further to the west, such as Greendale and Luddenham West, is better suited to agriculture, as it has better quality soils and is more affected by ANEF restrictions. In fact, we understand that the Badgerys Creek West Landowners Group, which is associated with land to the directly to the west of the airport (to the northwest of the subject site) has expressed interest in expanding their operations further west rather than south.

Current uses:

There are no registered agricultural business as per ABN data. Local residents have confirmed this lack of agriculture. This means there would be no risk of displacing or losing any key agricultural operations if the future zoning were to allow for more flexible employment uses.

There are multiple small business and industries, the most significant being trucking/freight operations. Opportunity exists to capitalise on this existing agglomeration of freight operations. (Note: More investigation is needed to determine the exact type and scale of these existing operations.)

Relatively fragmented land ownership:

The site's land ownership is relatively fragmented, with lots generally in the 1.2ha to 2ha range. This makes the land less suitable for large-scale agricultural activities.

Proximity to airport freight and logistics precinct and key transport infrastructure:

The site is positioned in close proximity to the airport freight and logistics precinct and is well located to play a supporting freight and logistics role.

Additionally, the site is surrounded by key road infrastructure on all sides—The Northern Road to the north and east, Greendale Road to the south and the M9 Orbital to the west. Business and residents within the precinct will have easy access to Sydney's arterial road network.

Consistency with strategic objectives:

The proposed Southern Gateway Precinct would not notably hinder any State or local strategic objectives for the Western Sydney Aerotropolis.

The Western City District Plan identifies the Aerotropolis as a key economic catalyst for the area, and the proposed Southern Gateway Precinct would contribute to the Aerotropolis' economic success.

We acknowledge that the Western City District Plan envisions an agribusiness precinct near the airport. However, the proposed Southern Gateway Precinct would not directly hinder the realisation of this vision; it would simply allow for additional flexibility in land use and development outcomes.

4.2 Challenges ahead

There are a number of challenges to creating the proposed Southern Gateway Precinct, as outlined below:

Integration with Aerotropolis Core:

Integration with the Aerotropolis Core would need to be considered as part of creation of the Southern Gateway Precinct. Overall, we believe the current infrastructure plans will allow for adequate integration, and we do not believe that The Northern Road would function as a major barrier.

While there may be no large intersection planned expressly for the purposes of connecting the site to the Aerotropolis Core, business and residents in the Southern Gateway Precinct would still be able to access the Core via the existing and planned road network. The upgraded The Northern Road and Bringelly Road intersection will provide smooth and easy access between Greendale Road and The Northern Road, and access into the Core would be achieved via Badgerys Creek Road, Derwent Road and Mersey Road.

Relationship to agricultural lands to the west:

As part of the creation of the Southern Gateway Precinct, the relationship to the agricultural lands to the west/northwest would need to be considered. This issue could be dealt with at the detailed precinct planning stage through appropriate buffer zones or transition areas. It is not a fundamental obstacle that should prevent flexible employment uses from occurring.

Outcome of DPI study:

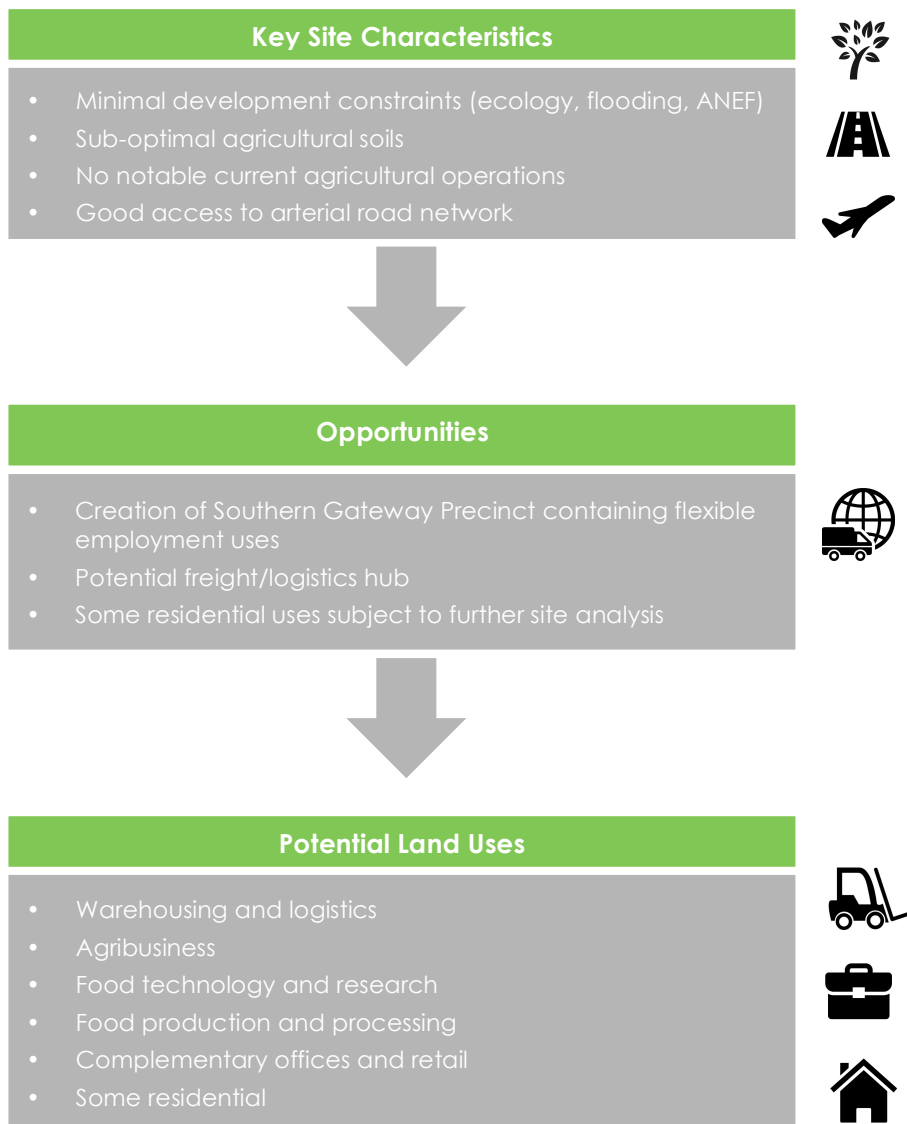
DPI's feasibility study is expected to be available in early 2019. It is anticipated that the study will identify the best areas for agriculture and agribusiness, consider the economic viability of the agribusiness industry in the area and identify the preferred location for the future agri-port. The results of the study will be a key consideration in the future of the subject site.⁶

5. Conclusion

In summary, AAAG is concerned that the proposed Agriculture and Agribusiness Precinct is premature and ill-conceived, lacking in quantitative justification and overly broad-brush in its approach. It would leave the site sterilised—unsuitable for agriculture and lacking in redevelopment potential due to zoning.

In order to prevent such an outcome, AAAG proposes that the site be re-classified as the Southern Gateway Precinct with flexible employment uses.

The chart below summarises the key site characteristics, opportunities and potential land uses for the proposed Southern Gateway Precinct.



We consider that the proposed Southern Gateway Precinct has strategic merit and would benefit from further discussion with DP&E. As such, we kindly request a meeting with key DP&E staff to discuss the issues raised in this submission.

Please do not hesitate to contact me on 8073 4677 or at acoburn@mecone.com.au if you have any questions.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Adam Coburn', written in a cursive style.

Adam Coburn, Director

Appendix 1

List of Residents

Appendix 2

Real estate correspondence

5th October 2018



1393 Camden Valley Way,
Leppington NSW 2179

PO Box 97
Leppington NSW 2179

t 02 9606 4311

f 02 9606 4399

e leppington@ljhooker.com.au

To Whom It May Concern

With the release of the draft structure plan for the Western Sydney Aerotropolis, there is much confusion around the proposed zoning of Agriculture & Agri business.

Due to the limited information and definition of what the actual proposed zoning is, residents and purchasers do not understand what will and will not be allowed.

This is having an adverse impact on property prices.

Prospective purchaser' are reluctant to buy property in this area as a result.

Since the release of the draft structure plan we have witnessed a reduction in enquires from purchasers wishing to secure property in the above area.

It is worth noting that our office has been established since 1999 and has been actively working the area.

Should you require any further information please do not hesitate to contact me.

Yours faithfully,
LJ Hooker Leppington

A handwritten signature in blue ink, appearing to read "Anthony Bucca".

Anthony Bucca

Appendix 3

Investor correspondence

AEROTROPOLIS GROUP Pty Ltd

31st Oct 2018

To Aerotropolis Agribusiness Action Group Bringelly

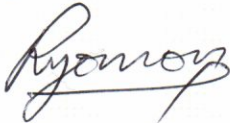
Hi Mr. Paul Coyto,

Aerotropolis Group would be interested to buy some land in the proposed 'Southern Gateway' of the Western Sydney Aerotropolis, as part of expanding our project, if usage/zoning of the land is appropriate.

We believe that, Southern Gateway is the right location for Mixed flexible Employment and Urban Land, similar to Northern Gateway.

Looking forward to discuss further with you about the opportunity.

Regards



Jomon Varghese

Managing Director & CEO

Aerotropolis Group & World Trade Center Sydney (WTC SYDNEY)