

Camden Council Submission to the

Draft Aerotropolis “Initial Precinct” Plans

Draft Initial Place-Based Infrastructure Compact (PIC)

Draft Western Sydney Aerotropolis Special Infrastructure Contribution (SIC)



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Executive Summary

This document forms Camden Council’s submission on the Draft Aerotropolis “Initial Precinct” Plans, Draft Initial Place-Based Infrastructure Compact (PIC), and Draft Western Sydney Aerotropolis Special Infrastructure Contribution (SIC) placed on public exhibition by the Department of Planning, Industry and Environment (DPIE) and the Greater Sydney Commission (GSC) from 10 November 2020 to 26 February 2021.

Council has identified a number of key recommendations for each of these documents, having consideration for the implications for Leppington North precinct which is located within the Draft PIC boundary, and other high-growth areas in the Camden LGA including the South West Growth Area.

Council would be happy to discuss the key recommendations contained in this submission with DPIE and the GSC in greater detail.

This submission was endorsed by Council on 6 February 2021.

Key recommendations for the Draft Aerotropolis “Initial Precinct” Plans

Planning for Precincts in the South West Growth Area

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

- Ensure that the proposed built form outcomes for the “Aerotropolis Core” initial precinct, including building heights and FSRs, are considered during the future precinct planning for the South Creek West precinct in the South West Growth Area.
- Investigate options for a future Enterprise Corridor along Bringelly Road and a future Employment Land Investigation Area along The Northern Road as identified on Page 53 of Camden Council’s adopted Local Strategic Planning Statement.

Review of the South West Growth Area Structure Plan

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

- Undertakes a review of the existing Structure Plan for the South West Growth Area and finalises a Land Use and Infrastructure Implementation Plan (LUIIP) for the South West Growth Area as a matter of priority, noting that Council has repeatedly sought a review of the Structure Plan since its adoption in 2006.



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Planning and delivery of public transport infrastructure

Council recommends that the Department of Planning, Industry & Environment the Greater Sydney Commission and Transport for NSW:

- Acknowledge the need for the early delivery of public transport infrastructure between the Aerotropolis and the Camden LGA, including rail and rapid bus, to provide access to the Aerotropolis for Camden's residents.
- Prioritise the planning and delivery of public transport to ensure that Camden's residents will be able to access the forecast employment opportunities within the Aerotropolis prior to the opening of the Western Sydney International (Nancy-Bird Walton) Airport in 2026.

Key recommendations for the Draft Initial Place-Based Infrastructure Compact (PIC)

Key findings under the draft PIC

Council recommends that the Greater Sydney Commission:

- Notes that Council does not support Finding 2 and the "Thriving Aerotropolis" scenario under the draft PIC.
- Reviews the growth scenario and considers a more flexible scenario which ensures an equitable allocation of jobs across the Western Parkland City.

The PIC methodology and assumptions

Council recommends that the Greater Sydney Commission:

- Reviews the proposed growth scenarios under the draft PIC and consider a model which is more flexible and able to be updated over time.
- Clarifies how the population and job forecasts for areas outside the PIC boundary will be used to inform future strategic and infrastructure planning for those areas, as concern is raised if it is intended that these forecasts are to be 'locked-in' without further review.



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Proposed actions under the PIC

Council recommends that the Greater Sydney Commission:

- Confirms that the out-of-sequence development provisions of the draft PIC do not apply to the servicing of precincts within the South West Growth Area and other existing and planned development areas (Proposed Action 5).
- Confirms that the "Fit-for-Place" program, which will closely align infrastructure delivery to demand, will apply to both the South West Growth Area and other high-growth areas within the Camden LGA (Proposed Action 6).
- Confirms that the forward public land and property program will be informed by the outcomes of Proposed Actions 6 and 8 to ensure that an infrastructure and land acquisition pipeline is established in the South West Growth Area and other high-growth areas in the Camden LGA. (proposed Action 7).
- Proceed with place-based business cases for infrastructure planning, prioritisation and delivery, with the intention of stimulating public and private investment and addressing barriers to growth including fragmented land ownership (Proposed Action 8)

Leppington North precinct

Council recommends that the Greater Sydney Commission:

- Amends the PIC following the finalisation of the Leppington Town Centre review to ensure that the PIC reflects updated population and employment forecasts and infrastructure requirements.
- Ensures that there is sufficient flexibility under *Proposed Action 6 – 'Fit-for-Place' program* and *Proposed Action 8 – Shifting to place-based business cases* so infrastructure provision can respond to demand across all development types and sectors, not only residential development.

Advocacy for a PIC for the Camden LGA and Greater Macarthur

Council recommends that the Greater Sydney Commission:

- Commits to a timeframe to commence the preparation of a PIC for the Camden LGA and Greater Macarthur, and investigates whether the PIC process could occur concurrently with the review of the Structure Plan and preparation of the LUIMP for the South West Growth Area by DPIE.



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Key recommendations for the Draft Western Sydney Aerotropolis Special Infrastructure Contribution (SIC)

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

- Clarifies the potential funding shortfall under the Western Sydney Growth Areas SIC resulting from the overlap with the Proposed SIC, and amends the Growth Areas SIC as a matter of urgency to ensure that the Western Sydney Growth Areas SIC will not under-collect developer contributions towards SIC infrastructure in the South West Growth Area.



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Relationship between this submission and other submissions

Draft PIC

Camden Council officers have participated in the preparation of two further submissions on the Draft PIC as outlined below:

- a joint submission prepared by the Western Parkland Councils, which represents the eight Councils who have partnered with the Australian and NSW Governments to deliver the Western Sydney City Deal, and focuses on matters of regional importance across the entire Western Parkland City; and
- a joint submission prepared by officers from Camden, Campbelltown and Wollondilly Councils which focuses on the urgent need for a PIC across the greater Macarthur region.

It is requested that this submission be read in conjunction with the abovementioned submissions.

Previous Council submission on Western Sydney Aerotropolis Plan – February 2020

At the meeting of 25 February 2020, Council endorsed a submission on the draft Western Sydney Aerotropolis Plan.

This previous submission considered the entire Western Sydney Aerotropolis Plan and its impact upon the existing and future community, and identified key issues and recommendations on the following subjects:

- A vision for the Aerotropolis;
- Implementing the vision;
- Infrastructure;
- Safeguarding the 24-hour airport;
- Resilience and adaptability;
- Precinct planning; and
- Infrastructure funding and provision.

Whilst a number of Council's issues and recommendations have been or are intended to be addressed through projects such as the Draft PIC, the draft "Initial Precinct" plans, the draft SIC, and other projects under the Western Sydney City Deal, it is requested that GSC and DPIE continue to address the recommendations contained in Council's earlier submission as the planning and delivery of the Aerotropolis evolves.

A copy of Council's previous submission can be obtained via the link below:

<https://www.camden.nsw.gov.au/assets/pdfs/Council/Plans-and-Strategies/Submissions-and-Position-Papers/Camden-Council-Submission-2020-Western-Sydney-Aerotropolis-Plan-FINAL-as-approved-by-Council-25-02-2020.pdf>



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Draft Aerotropolis “Initial Precinct” Plans

The Draft Aerotropolis “Initial Precinct” Plans seek to establish land use and development controls for the “initial” precincts which are located wholly within the Liverpool and Penrith LGAs. Given that these plans do not have a direct impact on land within the Camden LGA, the focus of this submission is the relationship between the draft precinct plans and the planning and development of adjoining land within the Camden LGA.

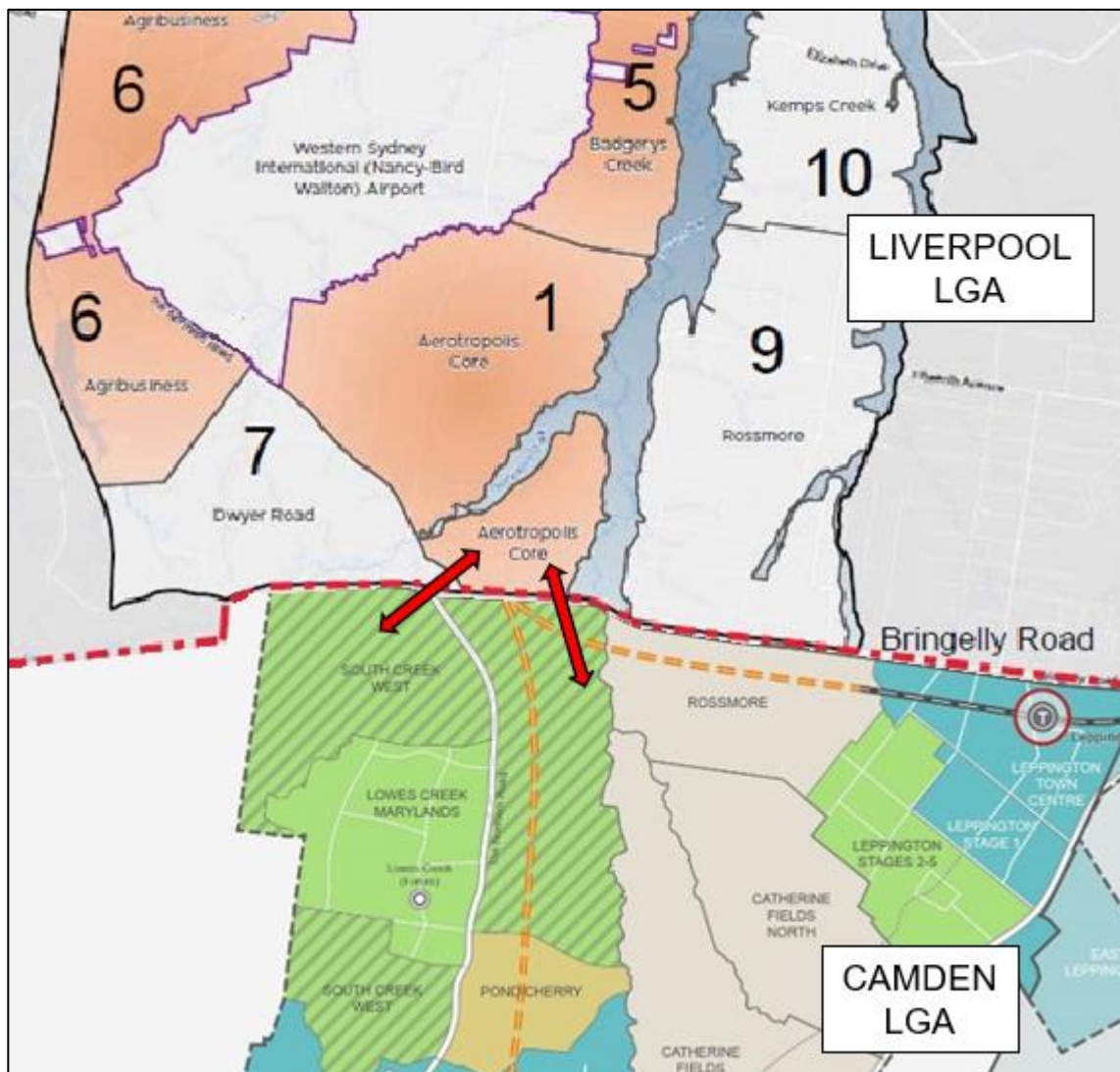


Figure 1 – location of Aerotropolis “Initial Precincts”, the South West Growth Area precincts, the Camden and Liverpool LGA boundary (shown with a red dashed line)



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Planning for precincts in the South West Growth Area

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

- Ensure that the proposed built form outcomes for the "Aerotropolis Core" initial precinct, including building heights and FSRs, are considered during the future precinct planning for the South Creek West precinct in the South West Growth Area.
- Investigate options for a future Enterprise Corridor along Bringelly Road and a future Employment Land Investigation Area along The Northern Road as identified on Page 53 of Camden Council's adopted Local Strategic Planning Statement.

The "Aerotropolis Core" initial precinct is located immediately to the north of the South Creek West precinct in the South West Growth Area. South Creek West was formally released by DPIE in 2017 but the precinct planning process has yet to commence.

It is essential that the planning for South Creek West has regard for the bulk, scale and intensity of the planned "Aerotropolis Core" development and considers appropriate controls for South Creek West which provide a buffer between future development in the South West Growth Area – in terms of both the built form and the land use zones/missibility. This could include the investigation of a business/enterprise corridor along Bringelly Road and employment land investigation area along The Northern Road as per Page 53 of Council's adopted Local Strategic Planning Statement (LSPS) and as shown in **Figure 2**.

A copy of Camden Council's adopted LSPS can be obtained via the link below:

<https://www.camden.nsw.gov.au/assets/Uploads/adopted-LSPS.pdf>



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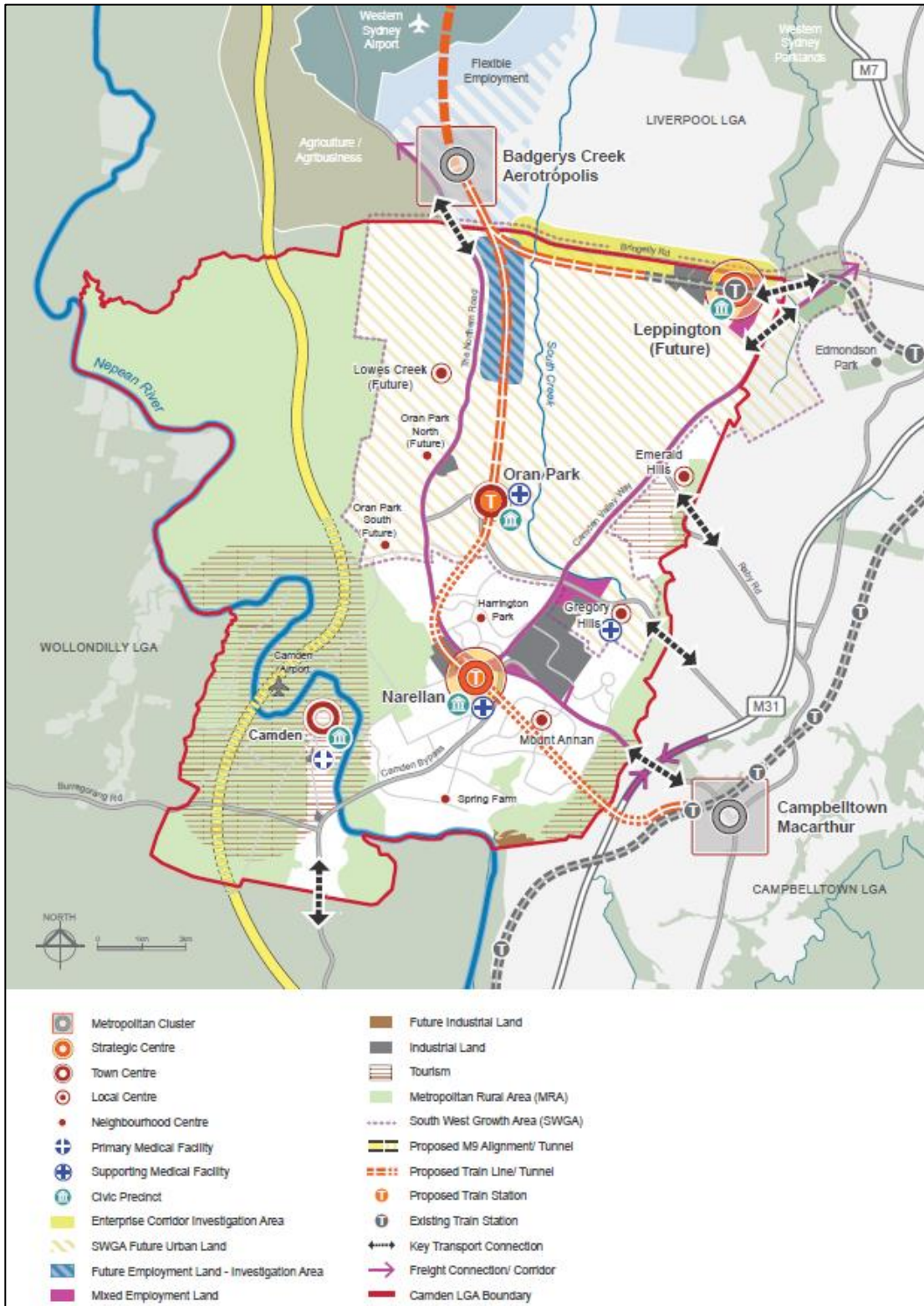


Figure 2 – Extract from Page 53 of Camden Council's adopted LSPS



Review of the South West Growth Area Structure Plan

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

- Undertakes a review of the existing Structure Plan for the South West Growth Area and finalises a Land Use and Infrastructure Implementation Plan (LUIIP) for the South West Growth Area as a matter of priority, noting that Council has repeatedly sought a review of the Structure Plan since its adoption in 2006.

The Structure Plan for the South West Growth Area (SWGA) establishes the high-level vision for the development of the growth area precincts, including the location of town and neighbourhood centres, industrial, employment and conservation lands, and private and public transportation links.

The South West Growth Area Structure Plan was prepared by DPIE in 2006. Since that time, Council officers have repeatedly sought a review of the Structure Plan as a priority. It is now essential that the Structure Plan now be reviewed by DPIE to have regard for the various changes that have occurred in planning for the growth of this region including:

- the outcomes of rezoning the growth area precincts of Oran Park, Turner Road, Catherine Field (Part), Leppington North and Leppington Stage 1;
- changes to the district and regional strategic planning framework, and the adoption of Camden Council's Local Strategic Planning Statement;
- the announcement, planning and commencement of works for the Western Sydney International (Nancy-Bird Walton) Airport;
- the completion of the South West Rail Link to Leppington;
- the gazettal of corridors for the extension of the South West Rail Link and the North South Rail Line; and
- the commencement of planning for the Aerotropolis "Initial Precincts" and the preparation of the draft PIC.

In recent times, "Structure Plans" have been superseded by Land Use and Infrastructure Implementation Plans (LUIIPs) which include significantly more detail. It is envisaged that a LUIIP for the SWGA could include in the following:

- a long-term vision for the SWGA so the community grows as planned;
- articulating the essential transport links for the SWGA, including integrated development with the North South Rail Line, and South West Rail Link Extension;
- providing an infrastructure masterplan;
- identifying areas for growth, based on a detailed analysis of opportunities and constraints;
- developing a framework to guide future planning; and
- establishing an implementation and monitoring framework.



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The need to review the Structure Plan and prepare a LUIP is also identified as an action under *Priority 11 – Aligning infrastructure delivery with growth* on pages 28 and 29 of Council's adopted LSPS.

Planning and delivery of public transport infrastructure

Council recommends that the Department of Planning, Industry & Environment the Greater Sydney Commission and Transport for NSW:

- Acknowledge the need for the early delivery of public transport infrastructure between the Aerotropolis and the Camden LGA, including rail and rapid bus, to provide access to the Aerotropolis for Camden's residents.
- Prioritise the planning and delivery of public transport to ensure that Camden's residents will be able to access the forecast employment opportunities within the Aerotropolis prior to the opening of the Western Sydney International (Nancy-Bird Walton) Airport in 2026.

The Aerotropolis "Initial Precinct" Plans identify that the "Aerotropolis Core will be the economic hub" and "will be home to between 50,000 and 60,000 workers". It is essential that public transport connections are available so that Camden's residents can efficiently access these employment opportunities, whilst also enhancing connections between the Aerotropolis and key centres in the Camden LGA. A failure to deliver viable public transport options from the Camden LGA to the Aerotropolis will further entrench the reliance on private motor vehicles within this region.

The Western Sydney City Deal includes two key commitments for the delivery of public transport in the Western Parkland City including:

- Commitment C1 – Deliver Rail for the Western City, which seeks to deliver the first stage of rail between St Marys and the Aerotropolis prior to the opening of the Airport in 2026; and
- Commitment C2 – Rapid Bus Service for the Western City, which seeks to establish a network of Rapid Bus corridors across the Western Parkland City prior to the opening of the Airport in 2026.

Whilst work is continuing on the delivery of these two City Deal commitments by the NSW Government, further work is required for the planning and delivery of the second stage of rail to Oran Park and Narellan and through to Macarthur, and the extension of the South West Rail Link from the Aerotropolis to Leppington Station. The locations of these public transport corridors is indicatively shown on Page 27 of Council's adopted LSPS and at **Figure 3** in this submission.



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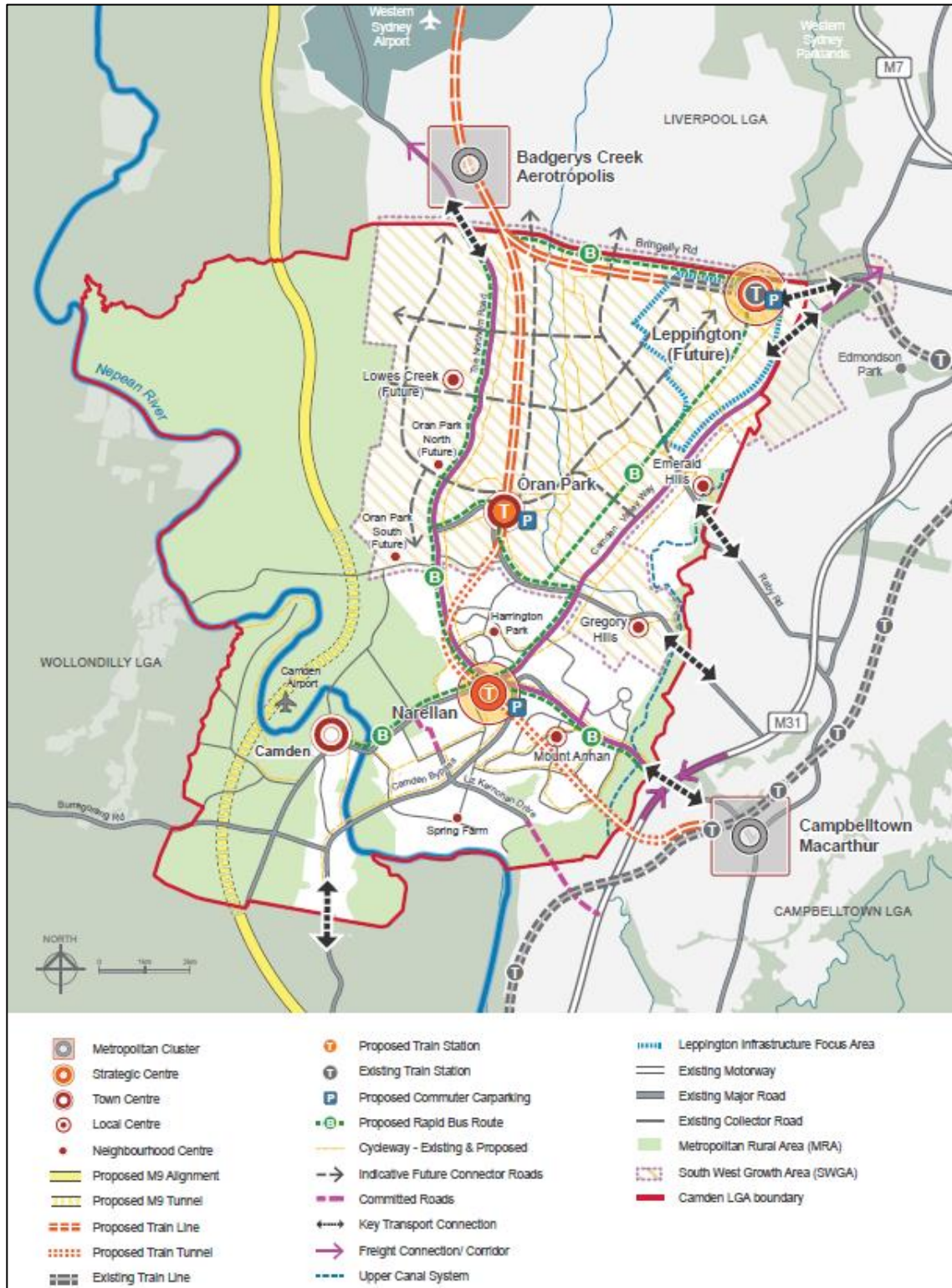


Figure 3 – Key transport corridors and connections for the Camden LGA

Draft Initial Place-Based Infrastructure Compact (PIC)

Land to which the draft PIC applies

The Draft PIC applies to three geographical areas shown in Figure 2 below which are:

- Aerotropolis;
- Greater Penrith to Eastern Creek area; and
- Austral to Glenfield Corridor.

The Austral to Glenfield Corridor includes the Leppington North precinct in the South West Growth Area – part of which is located in the Camden LGA as hatched in blue.

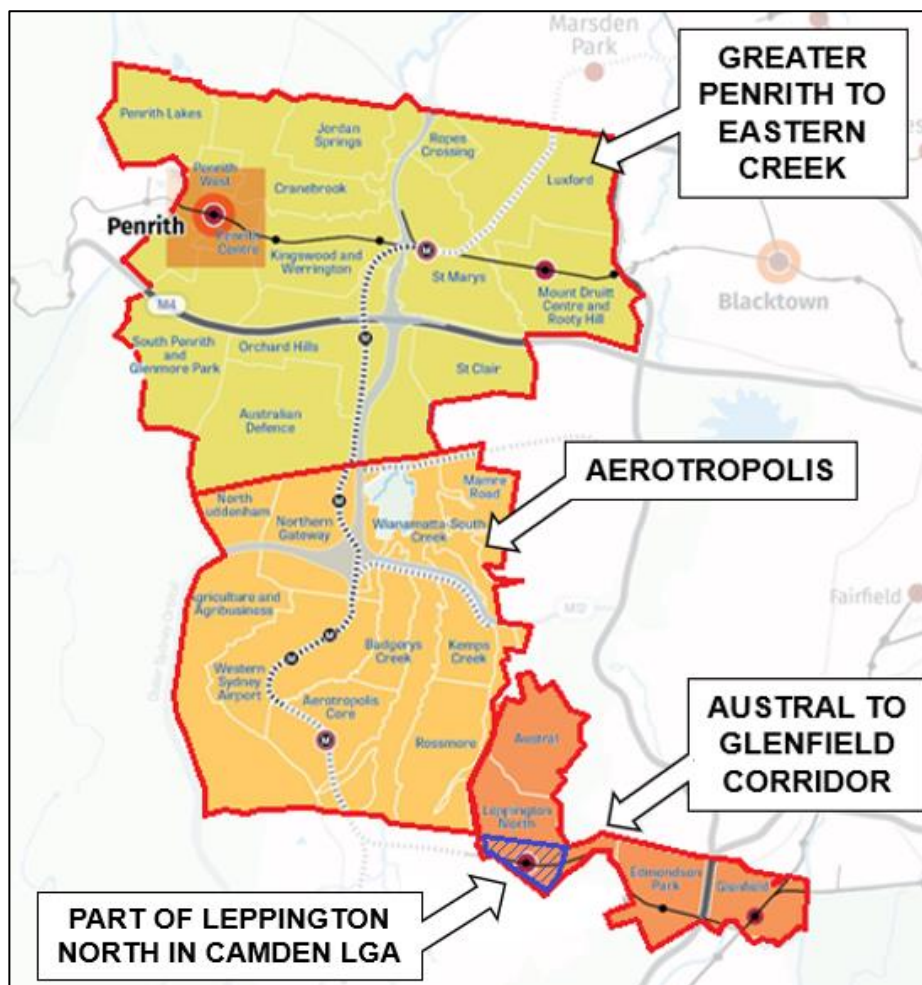


Figure 4 – PIC areas and Leppington North in the Camden LGA



Structure of PIC submission

This submission is focused on the how the draft PIC applies to the Camden LGA and is structured as follows:

- Key findings under the draft PIC
- The PIC methodology and assumptions
- Proposed actions under the PIC; and
- The Leppington North Precinct;

Key findings under the draft PIC

Council recommends that the Greater Sydney Commission:

- Notes that Council does not support Finding 2 and the "Thriving Aerotropolis" scenario under the draft PIC.
- Reviews the growth scenario and considers a more flexible scenario which ensures an equitable allocation of jobs across the Western Parkland City.

The Draft PIC includes six key findings which underpin the rationale for preparing the PIC. Five of these key findings are supported in-principle and include:

- *Finding 1 – The scale of the opportunity is significant and the choices are vast;*
- *Finding 3 – The Western Parkland City vision needs sustained and upfront investment;*
- *Finding 4 – Co-funding infrastructure to make great places is key;*
- *Finding 5 – Early insights can inform better decision-making; and*
- *Finding 6 – New ways of thinking are essential to resilience.*

The finding which is not supported is *Finding 2 – Rebalancing jobs will deliver community benefits and better equity*. The preferred development and infrastructure scenario under the draft PIC is "Thriving Aerotropolis" which is estimated to deliver 86,000 more jobs across the Western Parkland City by 2056 compared to the "Thriving Metropolitan Cluster" scenario. However, this is achieved by reallocating infrastructure and jobs towards the Aerotropolis and reducing infrastructure and jobs in other parts of the Western Parkland City, including key metropolitan centres.

The "Thriving Metropolitan Cluster" scenario is also identified as delivering a greater net benefit of \$4bn vs \$3.5bn for the "Thriving Aerotropolis" scenario which is a considerable additional net benefit for the Western Parkland City.



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The PIC methodology and assumptions

Council recommends that the Greater Sydney Commission:

- Reviews the proposed growth scenarios under the draft PIC and consider a model which is more flexible and able to be updated over time.
- Clarifies how the population and job forecasts for areas outside the PIC boundary will be used to inform future strategic and infrastructure planning for those areas, as concern is raised if it is intended that these forecasts are to be 'locked-in' without further review.

A detailed review of the draft PIC has been undertaken to inform this submission, and the following observations are made regarding the assumptions and methodology contained in the draft PIC documents:

- The growth scenarios and methodology embedded in the draft PIC are informed by assumptions which are variable and subject to change over time. However, the draft PIC does not acknowledge this variability as it seeks to adopt one specific growth scenario (Thriving Aerotropolis) to inform the infrastructure priorities. It is recommended that an alternative approach be adopted which is able to respond to emerging economic, housing and employment trends and can adjust between different growth scenarios over time, with corresponding changes to be made to the finalised PIC.
- Whilst the draft PIC clearly defines the land to which it applies (specifically the Aerotropolis, Greater Penrith to Eastern Creek, and Austral to Glenfield corridors), its population and jobs assumptions extend beyond the draft PIC area to cover to the entire Western Parkland City. This results in different population and jobs assumptions for non-PIC areas depending upon which PIC growth scenario is chosen. These changes to population and jobs assumptions for non-PIC areas may require further examination and justification. The draft PIC is also unclear on the status of these assumptions for the non-PIC areas, and how they will be used for future planning purposes (i.e. will these be locked-in to inform future PICs or local/district/regional planning and infrastructure activities in future?).



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Proposed actions under the PIC

The following recommendations are made regarding the proposed actions under the PIC which are relevant to the Leppington North Precinct and other high-growth areas of the Camden LGA including the South West Growth Area:

Council recommends that the Greater Sydney Commission:

- Confirm that the out-of-sequence development provisions of the draft PIC do not apply to the servicing of precincts within the South West Growth Area and other existing and planned development areas (Proposed Action 5).
- Confirm that the "Fit-for-Place" program, which will closely align infrastructure delivery to demand, will apply to both the South West Growth Area and other high-growth areas within the Camden LGA (Proposed Action 6).
- Confirm that the forward public land and property program will be informed by the outcomes of Proposed Actions 6 and 8 to ensure that an infrastructure and land acquisition pipeline is established in the South West Growth Area and other high-growth areas in the Camden LGA. (proposed Action 7).
- Proceed with place-based business cases for infrastructure planning, prioritisation and delivery, with the intention of stimulating public and private investment and addressing barriers to growth including fragmented land ownership (Proposed Action 8)

Leppington North Precinct

Council recommends that the Greater Sydney Commission:

- Amends the PIC following the finalisation of the Leppington Town Centre review to ensure that the PIC reflects updated population and employment forecasts and infrastructure requirements.
- Ensures that there is sufficient flexibility under *Proposed Action 6 – 'Fit-for-Place' program* and *Proposed Action 8 – Shifting to place-based business cases* so infrastructure provision can respond to demand across all development types and sectors, not only residential development.



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The draft PIC identifies the Leppington North Precinct as an initial place for housing and people under the draft PIC, supported by a mix of complementary land uses.

A comprehensive review of the planning controls in the Leppington Town Centre is currently underway. The outcomes of this review may have implications for the type and timing of development within Leppington North and require a flexible approach to infrastructure delivery across all development types.

The timing of non-residential development in the Leppington town centre may also be accelerated due to the proximity of Leppington North to the Aerotropolis, and future connections from the Leppington Town Centre to the Airport and Aerotropolis including the extension to the South West Rail Link and the provision of rapid bus.

It is essential that the PIC is reviewed following the finalisation of the Leppington Town Centre Review and includes sufficient flexibility to respond to evolving market conditions.

Sufficient flexibility must be embedded in *Proposed Action 6 – 'Fit-for-Place' program* and *Proposed Action 8 – Shifting to place-based business cases* to ensure that infrastructure provision responds to demand across all development types and sectors, and not only residential development.

The relationship of Proposed Actions 6 and 8 to Leppington North will be discussed in greater detail under *"Other findings and proposed actions under the PIC"* on page 17 of this submission.

Advocacy for a PIC for the Camden LGA and Greater Macarthur

Council recommends that the Greater Sydney Commission:

- Commits to a timeframe to commence the preparation of a PIC for the Camden LGA and Greater Macarthur, and investigates whether the PIC process could occur concurrently with the review of the Structure Plan and preparation of the LUIP for the South West Growth Area by DPIE.

Pages 30 and 31 of the Draft PIC notes that the Camden and Greater Macarthur regions are identified as potential future PIC areas as shown in **Figure 5** in this submission. The Draft PIC also notes that:

"the Western Sydney PIC Program is intended as an enduring program for the Western Parkland City – its scope will be continually monitored and reviewed. As this occurs, the intent is for the remaining option areas to benefit from the use of the new PIC model. This recognises concerns raised by the councils, on behalf of



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their communities, that fast-growing areas outside the initial PIC area also require infrastructure aligned with growth.”

The Camden LGA is the fastest growing LGA in Australia and its existing and future community would substantially benefit from the preparation of a PIC for this LGA and the Greater Macarthur region. There may be opportunities to align a PIC process for the Camden LGA and Greater Macarthur region with a review of the South West Growth Area Structure Plan and preparation of a LUIP with DPIE, as there are synergies regarding the information and datasets needed to inform each process.

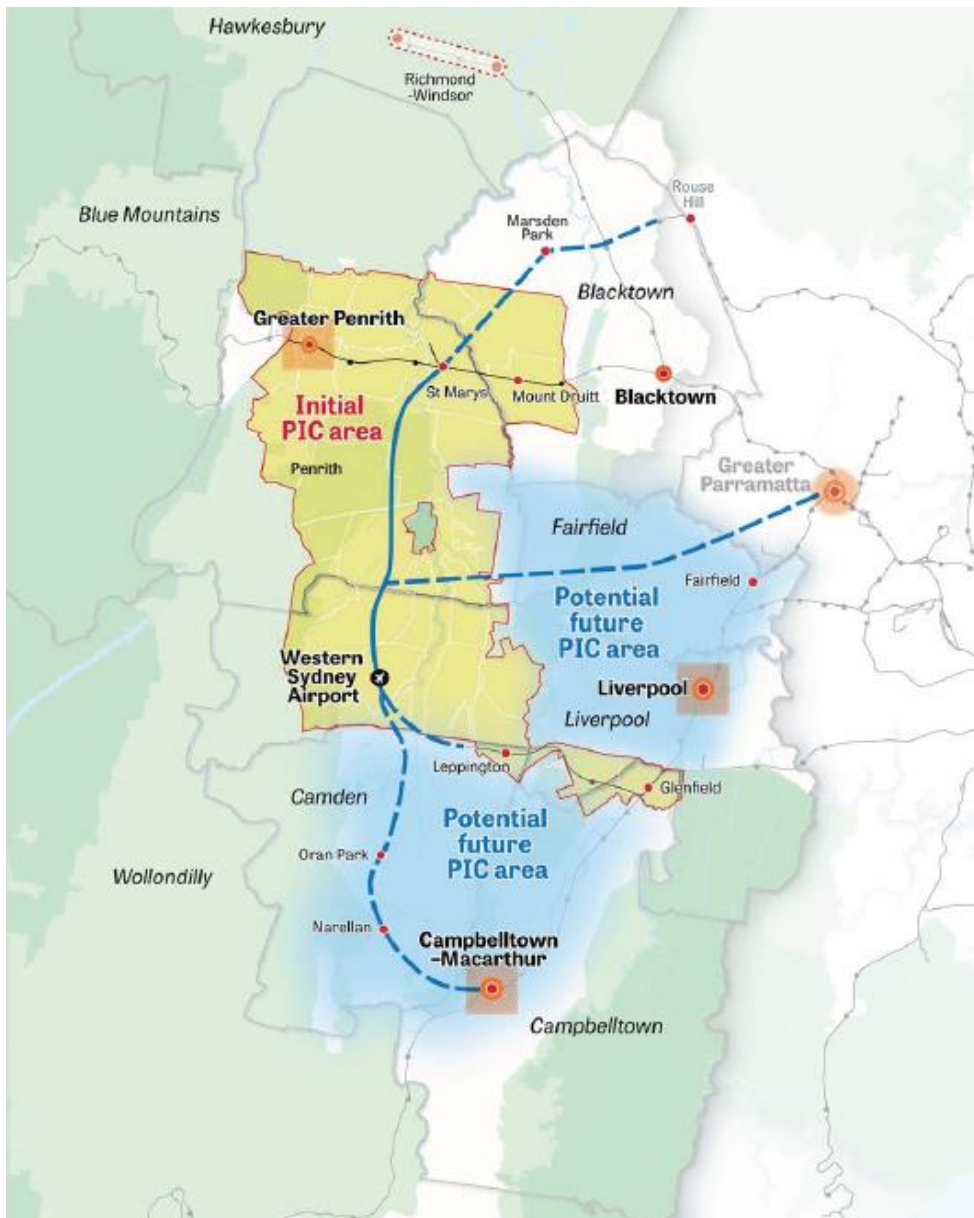


Figure 5 – potential future PIC areas



Draft Western Sydney Aerotropolis Special Infrastructure Contribution (SIC)

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

- Clarifies if there will be a funding shortfall under the Western Sydney Growth Areas SIC resulting from the overlap with the Draft SIC, and if so, amends the Growth Areas SIC as a matter of urgency to ensure that the Western Sydney Growth Areas SIC will not under-collect developer contributions towards SIC infrastructure in the South West Growth Area.

The exhibition documentation identifies that a portion of the Draft SIC overlaps with the South West Growth Area in the Liverpool LGA, which is subject to the existing Western Sydney Growth Areas SIC. It is noted that the draft SIC does not apply to land in the Camden LGA. DPIE proposes that to avoid developers making a contribution twice towards the same infrastructure, where there is an overlap, the developer will pay the full amount under the Draft SIC and the amount payable under the Western Sydney Growth Areas SIC will be discounted. The remaining contribution will fund the cost of the biodiversity offset as required under the Growth Centres Biodiversity Offset Program.

It is unclear whether this approach will result in a funding shortfall under the existing Western Sydney Growth Area SIC. It is requested that DPIE clarifies whether there will be a funding shortfall resulting from the overlap, and if so, amends the Western Sydney Growth Areas SIC as a matter of urgency to ensure that the Western Sydney Growth Areas SIC will not under-collect developer contributions towards SIC infrastructure in the South West Growth Area.



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