



12 March 2021

Department of Planning, Industry and Environment
Western Sydney Aerotropolis Precincts Submission
Locked Bag 5022,
Parramatta NSW 2124
Submitted via email to
<https://www.planningportal.nsw.gov.au/WSAPP>

To whom it may concern

Re: Western Sydney Aerotropolis Draft Precinct Plans: SSROC Submission

Thank you for the opportunity to make a submission regarding the exhibited Western Sydney Aerotropolis Draft Precinct Plans.

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of eleven local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of about 1.7 million, one third of the population of Sydney. SSROC seeks to advocate for the needs of our member councils and bring a regional perspective to the issues raised.

SSROC population and housing data¹, in the period from 2011 to 2016, reveals a very diverse socio-economic area marked by rapidly rising numbers of dwellings and underlying growth in the number of households in the area. The estimated resident population increased by over 150,000 during this five year census period.

As our area underwent rapid densification, it has increasingly been characterised by mounting numbers of households renting privately, many of whom continue to experience high rental stress. Analysis of weekly rental payments of households in the SSROC region show a larger proportion of households paying high rental payments (\$450 per week or more), and a smaller proportion of households with low rental payments (less than \$250 per week) when compared to Greater Sydney.

Although the urban growth of the SSROC area is unique, our region shares a number of issues and drivers with the Aerotropolis around managing rapid population growth sustainably while ensuring liveability. Regenerative and circular living and creating access to affordable homes have now become universal features of good planning.

¹ Source: Australian Bureau of Statistics, Census of population and Housing 2011 and 2016, compiled by id
<https://profile.id.com.au/ssroc/>



The integrated evidence-based strategic planning of the Aerotropolis Precincts has much to commend it. There are many elements that represent transferable best practice, that need to have much wider application, especially in other parts of Sydney. Even though this may involve incremental improvements rather than designing from scratch.

Key areas of focus for this submission

SSROC supports the Precinct's robust planning framework of principles and drivers contained within the Plans. Much of this work is outstanding and a welcome shift to longer term transformative strategic planning that promotes inclusive sustainable growth in our changing climate. Critically this is being linked to place-based Infrastructure planning and contributions.

While there are many clear, unique regional differences and particular landscape-led and place-based challenges being confronted by the planning of the Western Sydney Aerotropolis, there are two issues which Councils in SSROC are closely connected to and seek to find solutions to, albeit in different contexts. These relate to sustainability and to the challenge of delivering housing diversity that actually includes affordable rental housing.

Accordingly, of particular focus for this SSROC submission are those elements that focus on the sustainability and resilience framework and measures to deliver more affordable housing.

Background

The Western Sydney Aerotropolis will surround the planned Western Sydney International (Nancy Bird Walton) Airport and will contribute towards the 200,000 jobs target for the Western Parkland City. Jobs will be offered in technology, logistics, science, creative industries and agribusiness, within a cool, green connected environment.

This Western Sydney Aerotropolis Precinct Plan focuses on the initial precincts: the Aerotropolis Core, Badgerys Creek, Wianamatta-South Creek, Northern Gateway and Agribusiness precincts, as identified in the Western Sydney Aerotropolis Plan and State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (Aerotropolis SEPP). The Precinct Plan achieves the place-based planning principles and themes in the Western Sydney Aerotropolis Plan, including sustainability, connectivity, productivity, liveability, place and built form.

The Aerotropolis Plan (Western Sydney Aerotropolis Plan) identifies 10 precincts of which four, together with the Wianamatta-South Creek Corridor, are 'Initial Precincts'. This Precinct Plan relates to Aerotropolis Core, Wianamatta-South Creek Corridor, Northern Gateway, Badgerys Creek and Agribusiness.

Any master plan or development application must be consistent with the Precinct Plan objectives and requirements, and demonstrate consistency with the DCP. The Precinct Plan provides the framework and performance criteria for master plans and all development applications.

"The Aerotropolis Plan provides direction to promote a walkable, workable and liveable place with connections between accessibility, physical infrastructure, smart technology, sustainability and low carbon features, diverse housing and 24/7 Airport operations"².

SSROC welcomes the opportunity to make a constructive contribution to the exhibition of the Western Sydney Aerotropolis Draft Precinct Plans and has the following comments and feedback.

² NSW State Government, Western Sydney Planning Partnership, Draft Aerotropolis Precinct Plan, page 16, emphasis added.

Overview of the submission

This submission is organised in two sections:

1. General Comments
2. A detailed discussion of the design provisions for supporting the circular economy and for providing for housing affordability as part of housing diversity.

Each of these sections will focus on the significant changes being proposed that are relevant to SSROC. This submission makes a number of recommendations along with supporting rationales.

1 General Comments

SSROC strongly welcomes the Precinct Plan's commitment to the circular economy and to housing diversity and housing affordability. SSROC values and supports the considered partnership approach to integrated plan making and the funding of infrastructure.

SSROC specifically commends "a sustainability and resilience framework that provides opportunities for new sustainability initiatives and targets, where precinct design is supported by cyclical resources and net positive ecological, social and economic outcomes"³. Our changing climate is a shared problem.

Accordingly, SSROC fully supports two of the stated objectives underpinning the Plans, namely:

Objective 5

A sustainable, low carbon Aerotropolis that embeds the circular economy

Objective 9

Diverse, affordable, healthy, resilient and well-located housing

SSROC considers that more could be done to articulate and give practical expression to the housing related objectives.

1.1 The circular economy

SSROC affirms the strong vision for integrating the planning of the circular economy into the Aerotropolis.

"The Aerotropolis will be regenerative and a place that achieves net positive outcomes through a circular economy that avoids waste where possible; reduces the demand for resources through design and co-location; and re-uses materials wherever possible before conventional recycling. This system reduces resource demand and keeps resources in use as long as possible, then recovers and regenerates products and materials at the end of their life. It is a more efficient and environmentally sound alternative to the traditional linear economy that makes, uses and disposes of resources.

"Precinct-scale initiatives will be essential. Waste and recycling services in the Aerotropolis and public places should not impact places, workers and residents. Circular economy components should be integrated throughout the Aerotropolis as a system, located at scale

³ Precinct Plan, page 10



to maximise positive waste, water and energy outcomes. Circular economy infrastructure located close to where people live and work allows for the efficient collection of materials, encourages participation in recycling and activities, and maintains the quality of materials so they can be put back to productive reuse within the community”⁴.

It provides a useful aspirational model for urban planning of the circular economy, albeit without many of the constraints confronting renewal that exist in many established urban areas.

1.2 Housing Diversity

SSROC generally supports the Plan’s vision for integrating diverse, affordable, healthy, resilient and well-located housing.

However, while housing is to be an integral part of the Aerotropolis, the housing component is not always well articulated in the Plans. References to housing are currently scattered across various parts of the Plans and their planning frameworks rather than under a consolidated section for unified consideration and clarity. This shortcoming is particularly important when relating housing plans to demographic need, understanding price points and housing supply targets.

Housing remains somewhat de-emphasized and masked in the mixed use residential zone. Clearly there is an objective to ensure that residential uses do not predominate and squeeze out other critical land uses. Residential land uses, while a minor proportion of the overall Aerotropolis Precinct Plans, looks set to grow and become the home to nearly 43,000 people with around 16,000 chiefly new dwellings by 2056. This will build on early rapid growth of around 9,500 people and 3,700 dwellings by 2036 (see Table 1 below).

The plan’s approach to housing makes it harder to assess the full housing impacts and needs of the resident population as well as the need for and shape of affordable housing provision. As a consequence, it is recommended that housing should be given some greater priority in the Precinct Plans. Currently housing information appears to be relegated to the Technical Summary and other technical reports. The potential consequence is that housing is treated as an afterthought especially in such an otherwise well-integrated and comprehensive plan.

The Technical Summary Report notes that “The Western Sydney Planning Partnership have prepared precinct-specific projections (known as common planning assumptions) which outline the expected number of jobs, residents and dwelling to be accommodated over the coming decades. The projections in the Common Planning Assumptions (CPA) form the basis of planning aspirations and precinct planning”⁵.

It is important to incorporate clear up to date expressions of many of the Technical Summary Report findings around housing provision within the Precinct Plans.

Some of the key findings of the Technical Report Summary for housing included:

⁴ NSW State Government, Western Sydney Planning Partnership, Draft Aerotropolis Precinct Plan, page 32

⁵ Draft Aerotropolis Precinct Plan Technical Report Summaries November 2020, page 32

- Aerotropolis Core Precinct is the largest initial precinct and is envisaged to accommodate the greatest number of new dwellings and jobs. A mix of Enterprise and Mixed Use land zonings are proposed across the precinct.
- Establishment of a new residential community will be important to catalyse the location of local services.
- Precinct planning within the Mixed Use Zone should be prioritised given the importance of establishing a critical mass of residents within the precinct in attracting centre-based uses and broader employment activity.
- Master planning by Western City & Aerotropolis Authority (WCAA) and Sydney Metro around the Aerotropolis Core Metro Station will play an important role to unlock key development opportunities that will contribute to building investment momentum.
- In the early years, strategically located Government-owned sites could be key to catalysing development activity.
- The expeditious delivery of the Sydney Science Park will be critical in establishing the first resident catchment within the Aerotropolis. Master planning by Sydney Metro around the proposed Luddenham Metro Station will be important to coordinate and build upon the momentum generated by the Sydney Science Park.

Table 1: Based on the Technical Summary Report, Table 15, Potential development typology and their timing

Precinct	2016	2036	2056	Potential Development Typology	Comments
Dwellings					
Aerotropolis Core	373	1,873	8,373	Shop-top housing (5-12 storeys) Residential flat buildings (5-12 storeys) Multi-dwelling housing (3 storeys)	Medium density housing is expected to be taken-up first in the first 5 years, with shop top housing and higher density formats expected to commence delivery from Year 5. This results in a gradual start to dwellings take-up, which is expected to accelerate from Year 10 as higher density formats become viable to develop.
Badgerys Creek	72	18	6	Not Applicable	Reduction in dwellings due to demolition and new development.
Northern Gateway	80	1,655	5,905	Shop-top housing (9-15 storeys)	Medium density housing is expected to be taken-up first in the first 5 years, with shop top housing and

Precinct	2016	2036	2056	Potential Development Typology	Comments
				Residential flat buildings (9-15 storeys) Multi-dwelling housing (3 storeys)	higher density formats expected to commence delivery from Year 5. This results in a gradual start to dwellings take-up, which is expected to accelerate from Year 10 as higher density formats become viable to develop.
Agribusiness	607	1,288	1,476	Not Applicable	Rural workers' accommodation is permitted in Proposed SEPP.
Total	1132	4,834	15,760		
Population					
Aerotropolis Core	1,278	5,064	22,917	Based on Common Planning Assumptions household occupancy sizes	Persons per household: 2016: 3.42 2036: 2.7 2056: 2.74
Badgerys Creek	200	53	26		Persons per household: 2016: 2.76 2036: 2.95 2056: 4.46
Northern Gateway	246	4,423	16,183		Persons per household: 2016: 3.09 2036: 2.67 2056: 2.74
Agribusiness	1,722	3,319	3,800		Persons per household: 2016: 2.84 2036: 2.58 2056: 2.57
Total	3,446	12,859	42,926		

2 Detailed Discussion of the Plan Objectives and Performance Requirements

The draft precinct plans establish the strategic vision and general objectives, proposed land uses, performance criteria for development of land. This includes the approach taken to both the circular economy and affordable housing provision.

Part 3 of the Plan outlines the place-based Aerotropolis wide performance criteria for all of the Initial Precincts. This forms the focus of our detailed comments.

2.1 Sustainability and Resilience Framework⁶

Planning for the Aerotropolis will provide opportunities for new sustainability initiatives and targets, where sustainability is regenerative and strives to integrate the city and precinct design, supported by cyclical resources and net positive ecological, social and economic outcomes.

Helpfully the Plan adopts a range of principle guidelines. Two of note relate directly to enhancing the operation of the circular economy and are commended.

1. Favour circular economy systems such as local waste management strategies, food production, clean energy distribution, water treatment and recycling.
2. Essential waste and recycling services in the Aerotropolis and public places should not impact on the amenity for workers, residents, and the public such as visually unpleasant waste storage areas, noise, traffic and odours from waste collection services.

2.2 Circular Economy and Sustainable Living Design Objectives

The Plan usefully provides a set of 15 objectives for supporting the circular economy:

SRO1 Support opportunities for sustainable and efficient use of resources to minimise waste and deliver a circular economy, and water and energy from development to result in a carbon positive precinct by 2050.

SRO2 Transition to a net zero or net positive outcome over the medium to long term, with particular regard to waste management, water management, energy and carbon consumption.

SRO3 Set water and energy targets that exceed BASIX.

SRO4 Plan for green infrastructure that provide for water treatment and retention, urban cooling, ecosystem services and amenity and integrate it into built, landscaped and natural environments

SRO5 Minimise land use conflict and provide for a mix of uses in appropriate locations.

SRO6 Embed circular economy design principles into the buildings and infrastructure throughout the Aerotropolis to maximise the recycling and reuse of materials.

SRO7 Maximise the use of recovered materials in buildings, infrastructure and the public domain.

⁶ Precinct Plan, pages 171-172

SRO8 Collect and transport waste and extractive materials in a manner that is safe, efficient, cost effective and does not negatively impact on liveability and the environment.

SRO9 Protect existing recycling and resource recovery infrastructure and identify new locations for waste recycling and circular economy infrastructure.

SRO10 Encourage innovative approaches to sustainable design, construction and management of buildings and precincts.

SRO11 Facilitate the design, construction and operation of environmentally sustainable buildings and precincts, including energy efficiency, renewable energy, efficient resource and energy use and reduced emissions and waste.

SRO12 Provide for a transition to a sustainable regenerative outcome by enabling sustainable innovations as the Aerotropolis evolves.

SRO13 Recognise waste as a resource and the collection and transport of waste and recycling as an essential service that must be undertaken in a manner that is safe, efficient, cost effective and does not negatively impact on liveability and the environment.

SRO14 Facilitate and support a circular economy around repair, reuse, recycling, remanufacturing and reprocessing.

SRO15 Embed circular economy design principles into the buildings, public domain and infrastructures throughout the Aerotropolis to maximise the recycling, recovery and reuse of materials.

SSROC strongly supports the suite of 15 objectives as an integrated package within the Plan to support the circular economy and would generally welcome their wider adoption as planning objectives that can be adapted for different contexts by DPIE and local councils.

Corresponding to the 15 objectives the Plan proposes 15 performance requirements for activating land uses covered by the Plan in relation to better realising the circular economy.:

SR1 Utilise sustainable energy, water and waste systems to encourage a circular economy that improves efficiency and results in low-carbon developments.

SR2 Provide a diversity and integrated system of renewable energy supply including solar, green hydrogen, bio-energy and the like.

SR3 Ensure waste and recycling collection infrastructure is integrated within developments and where possible across separate developments while addressing storage, safety, efficiency, accessibility to waste, reuse and recycling services without compromising the safety and amenity of the public domain.

SR4 Ensure waste collection, power and water use, where relevant and possible, is communicated throughout to encourage the creation of sustainable regenerative outcomes.

SR5 Develop integrated systems for energy generation – waste and water

SR6 Design places to enable air flow, ventilation and appropriate building morphology to support the cooling of the built form and public spaces.

SR7 Plan for, and achieve, leading industry targets by 2025 and from 2026 beyond to achieve sustainable regenerative targets:

	Leading industry practice Target 2020 and 2025	Sustainable regenerative Target 2026 and beyond
BASIX	BASIX (energy) – 45-60 BASIX (water) - 60	BASIX (energy) – 45-60 BASIX (water) - 60
Non-residential uses (subject to final modelling)	GreenStar Communities – 5+ stars Green Star – 5+ stars NatHERS – 7 star	GreenStar Communities – 6+ stars Green Star – 6+ stars NatHERS – 8+ star/ Passive home
Circular economy targets	10% reduction of waste generation 85% reduction in construction waste	100% recovery and re-use of organic waste 90% reduction in construction waste

SR8 Development to prioritise procurement of building materials from within a 30km radius of the development site, where feasible.

SR9 Circular economy activities must be located in appropriate locations with consideration given to:

- adjacent land uses, considering the likely construction and operational impacts of the proposed development in order to prevent land use conflict
- proximity of the proposed development in relation to the Airport, and associated risks to airport and aircraft operations (in reference to the proposed development's risk assessment)
- alignment with land use zone objectives, including adjacent land uses
- proximity to Environment and Recreation Land Use zone and potential impacts to public space and its useability
- proximity to major transportation routes, considering safe transportation of extractive and waste materials.

SR10 Waste or resource management facilities should be located within an acceptable distance from the servicing customer base.

SR11 The distances from a circular economy activity to material processing plants or landfills should be minimised.

SR12 An appropriate buffer distance should be kept between the circular economy activity and residential areas or other sensitive land uses. An appropriate buffer distance is a distance which can be demonstrated to prevent unmitigated environmental nuisance.

SR13 Any circular economy or extract industry activities involving filling of land, including approved activities that have resulted in a change in landform, upon completion of the approved activity, the landform is to be returned to its original state through the use of Virgin Excavated Natural Materials (VENM) or Excavated Natural Material (ENM) or other soils under a specific resource recovery order and exemption. Note: Any material received for this purpose must be validated by a suitably qualified independent person to demonstrate that it is VENM or meets the requirements of the relevant resource recovery order/exemption and is fit for its intended purpose.



SR14 Development must be consistent with circular economy principles as defined in the NSW Circular Economy Policy Statement.

SR15 Incorporate Public Place Circular Economy Infrastructure into large commercial and mixed use developments to ensure adequate opportunity for people to participate in reuse and recycling schemes.

SSROC strongly supports the suite of 15 requirements as an integrated package within the Plan and would generally welcome their wider adoption as planning requirements that can be adapted judiciously for different contexts and locational constraints by local councils and DPIE and be referenced in the proposed Design and Place SEPP.

In particular, SSROC strongly supports the adoption of higher BASIX standards to achieve greater environmental performance in the Precinct Plan and recommends providing the legislative capacity for Local Councils to similarly adopt higher more ambitious BASIX standards in their LEPs without recourse to planning incentives, mirroring the two steps proposed in the Plan's requirements.

This is an opportunity to show support for transitioning buildings to net zero as our climate extends way beyond the Precinct Plan.

Notably the Aerotropolis Precinct Plan has the statutory weight of the Aerotropolis SEPP and can provide the opportunity for energy and water BASIX targets and other sustainability rating tools to be exceeded⁷.

This approach is consistent with proactively and practically adopting a pathway to the NSW Government target of net zero carbon emissions by 2050 and making NSW more resilient to a changing climate. Recent research *Future Proofing Residential Development to Climate Change, Stage 1 Report*, commissioned by Waverley, Randwick and Woollahra Councils points to the need for planning instruments to enable higher BASIX targets as the climate warms.

Findings from this report indicate that by 2070, houses in Eastern Sydney will need to use significantly more energy for cooling and very little energy for heating. With greatly increased reliance on air-conditioning, this will have implications for occupant health, energy affordability and energy security. These predictive results are likely to be repeated and amplified in the Aerotropolis Precinct and other parts of Western Sydney.

3 Land use and built form framework

The *Land Use and Built Form Framework* described in the Plan is informed by the land zones established in Aerotropolis Plan: Agribusiness, Enterprise, Environmental and Recreation and Mixed Use.

The Aerotropolis SEPP sets out the land use framework zones and prohibited uses only that are incompatible with the objectives for each zone. This encourages new and emerging uses in precincts such as Agribusiness that are compatible with the zone objectives.

The Aerotropolis Precinct Plan notes that this landscape-led precinct, is not implementing business as usual (underlining is this submission's emphasis), and "provides the opportunity to make the Aerotropolis a great place for workers, tourist and residents".

⁷ Precinct Plan, page 169

This framework creates new opportunities for housing responses that are intended to be more integrated with employment, recreation and other uses. In the process of creating this additional flexibility, it may also create the unintended possibility for some important issues like social equity and housing affordability to be insufficiently examined and responded to in the Plan. Most economists acknowledge that inequality has a profound adverse effect on economic growth and prosperity.

3.1 Land Use and Built Form Objectives⁸

The Plan provides a set of 7 objectives to guide Land Use and Built Form planning:

LUO1 Provide a range of employment across the Aerotropolis with other mixed uses such as residential, community, social and open space to meet the residential, working and visitor demand, specific to place.

LUO2 Achieve the objectives of land use zones, by providing the requirements for the type and location of land uses to achieve the Aerotropolis vision, including creating a 24/7 centre.

LUO3 Identify the Aerotropolis Core and the specialised centre in the Northern Gateway as higher order centres with social infrastructure and higher employment and residential densities.

LUO4 Locate local and neighbourhood centres in areas of high amenity linked to public transport.

LUO5 Link all centres to, and prioritise, active and public transport access over private vehicles.

LUO6 Suitably space local centres to provide sufficient services to enable walkable residential and working communities.

LUO7 Ensure sufficient distance between existing and proposed centres to ensure economic viability.

While SSROC supports these objectives, it is important to include and repeat the housing objectives of the Western Sydney District Plan. The Precinct Plan as a contributor to local housing markets should aim to support the proposed NSW Housing Strategy and be informed by the Partnership councils' Local Housing Strategies. Importantly the Plan should include an explicit affordable housing objective that links to Affordable Rental Housing Targets for very low to low-income households in Greater Sydney (potentially a new LU8). This is critical because the market does not deliver below-market housing offerings. Housing affordability is the most limiting choice many NSW households face. It can powerfully exclude many from living securely in locations and in ways that are most appropriate to a household, productive for the economy and conducive for a household's well-being.

The Government's Housing Strategy Discussion Paper flags a broad and inclusive vision⁹ for the role housing needs to play in NSW, to help provide:

⁸ Precinct Plan, pages 125-126

⁹ NSW Government, *Discussion Paper, A Housing Strategy for NSW* May 2020, page 10.

“Housing that supports security, comfort and choice for all people at all stages of their lives, achieved through supply that meets the demand for diverse, affordable and resilient housing and responds to environmental, cultural, social and economic contexts.”

NSW Government’s Greater Sydney Region Plan’s strategic objective 11: states that:

“Housing is more affordable and diverse

“Providing housing supply, choice and affordability, with access to jobs, services and public transport”

“Decisions are required to equitably enhance local opportunities, inclusion and connection to services.”¹⁰ A Metropolis of Three Cities “sets targets for new housing, with a range of types, tenures and price points to improve affordability”¹¹.

A best practice planning approach needs to clearly embed social equity priorities within its principles and objectives around housing

Western Sydney has long provided Sydney a significant source for affordable housing, where housing was available to low-income households, both as public and private rental. It has also been a major source of affordable home ownership. It has acted a shock absorber for Sydney’s deep unaffordability crisis in the housing market and address past policy failures and provide a pressure release valve when uncapped global capital flow inflows and high levels of migration have made a nonsense of static supply and demands models. Councils in SSROC and other parts of Sydney appreciate the benefit of having locations where workers can make their homes and then often commute to larger employment centres.

The provision of affordable and social housing is a critical and essential part of delivering housing diversity for those at the lower end of the income scale. These households often cannot effectively meet their housing needs in the housing market because of financial hardship from rental stress and tenancy insecurity.

The development of the Aerotropolis can and should aim to play a constructive role in the housing arena. The Aerotropolis is designed to be an accessible, innovative 24-hour metropolitan centre, connected globally, nationally, locally and digitally. The 30-minute city requires essential workers to live close by to the Aerotropolis. Initially local affordable rental housing will help to attract lower paid workers who will need to live close by to sustainably fill night shifts for the around the clock airport. Affordable housing provision becomes both a productivity and a social equity issue.

Social responsibility for the housing needs of each area’s population should ideally be addressed locally where there are local supports and are not transferred by inaction to other Greater Sydney Districts. Housing affordability is already a major issue for councils in SSROC. For various reasons homeless people in the Eastern City Sydney CBD often originate in other parts, including Western Sydney.

Adoption of a clear approach to housing affordability will strengthen the Aerotropolis’ social licence to operate and ability to serve the community.

¹⁰ NSW Government, Greater Sydney Region Plan, page 36

¹¹ Ibid page 3

3.2 Land Use and Built Form Requirements – all precincts

Importantly there is one performance requirement to realise the provision of affordable housing.

LU6 Provide a minimum of 5% affordable housing in any mixed use development.

SSROC strongly supports the inclusion of a minimum affordability requirement in the Precinct plan as a step towards not just a more equal inclusive society but also a more productive one.

However, SSROC has a number of recommendations to improve on the scale, scope and calibration of this requirement:

1. *Affordable housing contributions should be re-defined as applying to all zones that involve residential uses.*

Rather than limiting or confining affordable housing to mixed use residential, affordable housing contributions should notionally apply to all zones. This will provide flexibility, if in the future, there are use changes allowing residential uses. Signposting a potential affordable requirement provides strategic guidance if residential uses become a permissible through changes to other zones in the future.

2. *The contribution level should stipulate a minimum of 5% to 10% on privately owned land and or developments. A 10% target should generally apply if this is shown to be viable. A minimum 15% affordable housing target should apply on large Government owned sites. The target should also reflect the requirements in the proposed Design and Place SEPP¹².*

The Community Housing Industry Association (CHIA) NSW submission¹³ to the Western Sydney Aerotropolis Planning Package highlighted that there was a 41% increase in homelessness in the Western Sydney City Deal area between 2011 and 2016 census. 39% of households renting in Western Sydney City Deal area were in housing stress. By 2036, the Western Sydney City Deal area will need an additional 64,400 affordable and social housing dwellings.

The lack of any requirements for social housing should also be examined especially given current Aboriginal households' lack of access to suitable housing.

The CHIA submission backed by modelling from SGS makes a cogent case. The proposal for 5% requirement applying only to mixed use development appears to be seriously inadequate and will while useful ultimately leave Sydney a less fair place. The opportunity provided by the development of the Aerotropolis will have been missed and Sydney will be poorer for it.

Government investment in social and affordable housing needs to lead, complement and exceed the financial levies and contributions made by the private sector undertaking redevelopments. Housing provision for those in need remains a key Government responsibility and accountability. The intensity of government investment in around the Aerotropolis (such as

¹² Explanation of intended effect for a Design and Place SEPP, February 2021 'Within Greater Sydney, targets generally in the range of 5–10% of new residential floor space are viable and should be delivered (Greater Sydney Region Plan Objective 11).'

¹³ Community Housing Industry Association NSW submission to the Western Sydney Aerotropolis Planning Package, 13 March 2020

the Sydney Metro) means there is room for a much higher social dividend for the existing population of Western Sydney through government provision of social housing and affordable housing from the planning system.

Affordable housing targets of 5–10% for housing in private developments, where viable in areas of uplift, as established in District Plans should be exceeded in developments on Government owned land. The targets set for private developments should not be applied, as the Government is not constrained by the same commercial viability constraints and imperatives to provide market returns to private shareholders that apply to private developers.

3. *More guidance is required to clarify the calculation of affordable housing contributions and their administration.*
4. *The early application of the affordable housing requirements will help to ensure that essential workers are assisted at the critical establishment of the airports operations.*
5. *The adoption of affordable housing supply 'stretch' targets. These should be set out as a component of a Precinct Housing Strategy that includes overall dwelling targets across different tenures and housing types, at a variety of price points.*

4 Conclusion

Thank you for the opportunity to comment the exhibited Draft Aerotropolis Precinct Plans.

The intense and considered investment in the Plan's well-integrated approach that joins up social and cultural, economic and environmental planning and is coordinated by the governance of the Western Sydney City Deal has much to commend it. A compelling broader opportunity now exists to apply many of the Precinct's policy settings, requirements and learnings to improve placemaking more widely in growth areas further afield. The adoption of higher BASIX standards is a particularly important issue to highlight.

SSROC specifically commends the "sustainability and resilience framework that provides opportunities for new sustainability initiatives and targets, where precinct design is supported by cyclical resources and net positive ecological, social and economic outcomes". These policy settings should and can have wider application in the planning system.

While reflecting the unique circumstances and place for establishing the Aerotropolis in Western Sydney, there are many elements of the Precinct Plan that represent transferable best practice, and which need to have much wider application, especially in other parts of Sydney. There are opportunities to have these elements adopted by individual local councils, or across districts or the State through the proposed Design and Place SEPP.

SSROC member councils cover a large portion of Greater Sydney and have a direct interest in supporting and advocating for changes to improve and diversify the delivery of housing that meets the needs of our current and future communities by maintaining supply and increasing housing choice. Affordable housing is perhaps the most critical option or choice for lower income earners struggling in the private housing market. SSROC would encourage the review process to consider the opportunities to strengthen what has been proposed in the draft plans.



In order to make this submission within the timeframe for receiving comments, it has not been possible for it to be reviewed by councils or to be endorsed by the SSROC. I will contact you further if any issues arise as it is reviewed.

If you have any queries please do not hesitate to contact me or Mark Nutting, SSROC's Strategic Planning Manager on 8396 3800.

Again, thank you for the opportunity to comment on the Western Sydney Aerotropolis Draft Precinct Plans and we are keen to participate in any further consultation stages for the introduction of the new Western Sydney Aerotropolis Draft Precinct Plans, in particular consultations about changes that could particularly impact on our local councils.

Yours faithfully

A handwritten signature in black ink that reads 'H Sloan'.

Helen Sloan
Acting General Manager
Southern Sydney Regional Organisation of Council