



Monday 4 March 2024

Department of Planning, Housing and Infrastructure

Via: online portal

Subject: draft Bradfield City Centre Master Plan

The Centre for Western Sydney values the opportunity to comment on the draft Bradfield City Centre Master Plan prepared by the Western Parkland City Authority.

The Centre for Western Sydney combines world-class research expertise with frank and fearless advocacy on issues of importance to Western Sydney. The Centre's work is guided by its commitment to a thriving Western Sydney that leverages the region's strengths to work towards an equitable, prosperous and sustainable future.

The Centre sees the success of Bradfield City Centre as one of the key drivers of future prosperity for all Australians, especially those living in Western Sydney by levelling up opportunities.

Our submission focuses on how the design and development of Bradfield can unlock the potential of three areas key to driving a stronger Western Sydney economy and community: future industries, future skills and future communities.

If you require further information, please do not hesitate to contact Stefanie Balogh, Director of Higher Education and Public Policy at Western Sydney University at s.balogh@westernsydney.edu.au or 0413 083 226 Tom Nance, Policy and Strategy Lead at Western Sydney University at t.nance@westernsydney.edu.au or 0401 181 204.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andy Marks'.

Professor Andy Marks

Chief Executive Officer, NUW Alliance

Pro Vice-Chancellor, Strategy, Government and Alliances, Western Sydney University

Executive Director, Centre for Western Sydney

Submission | Draft Bradfield City Centre Master Plan

Monday 4 March 2024

Introduction

The [Centre for Western Sydney](#) at [Western Sydney University](#) welcomes the opportunity to comment on the [Draft Bradfield City Centre Master Plan](#), in particular its significant placemaking role in shaping Western Sydney's future economy and society.

The Centre is broadly supportive of the 10 master plan objectives and believes they provide a robust framework for Bradfield City Centre to fulfil its vision as a global leader in attracting investment and acting as a magnet for high-tech jobs closer to where people live. In particular, the innovation ecosystem, 24/7 vibrancy and global connection objectives align closely with the Centre's economic plan for Western Sydney, [Unlimited Potential](#).

Our plan, the first in a series of yearlong projects, is designed to highlight the most effective ways to capitalise on Western Sydney's advantages and map out its trajectory as a global powerhouse with highly skilled workers, future industries, well-paying jobs, and strong, cohesive communities.

The Centre sees the success of Bradfield City Centre as one of the key drivers of future prosperity for all Australians, especially those living in Western Sydney by levelling up opportunities. The city will have an impact far beyond its city boundary.

As the master plan states, "Bradfield City Centre is strategically located between the Northwest and Southwest Growth Areas and the existing and well-established centres of Greater Penrith, Liverpool, and Campbelltown-Macarthur".ⁱ

Next to the new Western Sydney International (Nancy-Bird Walton) Airport, Bradfield will be geographically and economically important as a "new central business district" for the Aerotropolis and the Western Parkland City.ⁱⁱ

Bradfield will be located just five minutes from the airport which is expected to move 37 million passengers a year by 2050 – accommodating more than half of all Sydney’s international air travel demand.ⁱⁱⁱ

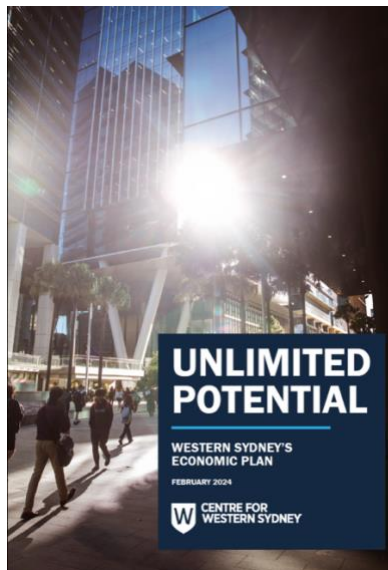
The master plan should be seen in the context of developing a world-class modern central business district to service Western Sydney’s growing demand alongside other important city centres in the region, rather than a new suburb. It will complement, rather than replace existing areas.

However, the Centre believes that many of the best practice design principles, especially around liveability and sustainability, should be adopted nationally in other developments.

As a key driver of the Aerotropolis, Bradfield has the potential to transform Western Sydney’s economy into a hub of advanced manufacturing, high technology industries, science, technology, innovation and engineering.

The benefits of these globally facing industries through higher skills and jobs will spill over into neighbouring centres such as Greater Penrith, Liverpool, and Campbelltown-Macarthur.

At the Centre, our ambition is to unlock the ‘unlimited potential’ of the region by attracting the global investment needed to create future industries and develop new skills and jobs.



Our economic plan demonstrates the urgent need to level up job creation in Western Sydney where 81 jobs exist for every 100 locals compared to 124 jobs for every 100 people in the rest of Sydney.

If Western Sydney had the same job-to-worker ratio as the rest of Sydney the region would generate about 400,000 new jobs compared to business as usual and a \$100 billion dividend to the local economy in just over a decade. People in Western Sydney would also be on average more than \$20,000 better off by 2036.

Bradfield's development is vital to attracting international investment and global partners to generate new industries, new high-tech jobs, and develop new skills and capabilities in Western Sydney. It will be an important ecosystem that helps to catalyse industry activation across the entire region.

Our submission focuses on:

1. Future Industries

1.1 Industries and innovation

1.2 Jobs

1.3 Destination of choice

2. Future Skills

3. Future Communities

3.1 Indigenous Australians

3.2 Future Bradfield residents

3.3 Housing

3.4 Liveability

3.5 Transport

3.6 Sustainability

3.7 Arts and cultural activities

Recommendations

Recommendation 1: Actively attract investment and new industries to strategically co-locate near universities, research institutions, and start-up incubators at Bradfield to commercialise and scale up new ideas.

Recommendation 2: Continue to focus on establishing Bradfield as Australia's leading centre of advanced manufacturing excellence.

Recommendation 3: Promote Bradfield as the international tourism gateway to destination Western Sydney.

Recommendation 4: Adopt the planned education partnership model between universities, TAFE, and industry across the nation to provide greater access to new in-demand skills and lifelong learning.

Recommendation 5: Continue engagement with Indigenous residents and stakeholders in a meaningful way, both during the development and delivery of Bradfield.

Recommendation 6: Constantly assess future population growth models in Bradfield to avoid catch-up services and vital infrastructure.

Recommendation 7: Health, education and innovation precincts such as those proposed for Bradfield and near the Aerotropolis must incorporate affordable housing development for key workers to ensure the retention of frontline and essential workers such as nurses, police, and teachers.

Recommendation 8: Encourage other jurisdictions to adopt best practice liveability initiatives planned for Bradfield so all Australians have high-quality amenities and quality of life.

Recommendation 9: Move from Rapid Buses to rail routes as quickly as practicable to join up growth centres in Western Sydney with Bradfield, the Western Sydney International Airport, and the Aerotropolis.
Undertake a feasibility study into the East West Rail Line to give investors certainty, and map out the route.

Recommendation 10: Encourage other jurisdictions to look to Bradfield's initiatives on net zero energy and water systems to adopt them in new developments.

Recommendation 11: Adopt the State of the Arts recommendation for a commitment to minimum per-capita funding for arts and culture based on population distribution across three tiers of government. This should begin with the development of a dedicated arts and cultural strategy for Western Sydney and ongoing funding for the Western Sydney Arts Alliance.

Adopt the State of the Arts recommendation to undertake a feasibility study for developing cultural precincts and creative industry clusters in Bradfield benchmarked against access to finance, access to talent, innovation, infrastructure, and access to wider markets.

1. Future industries

1.1 Industries and innovation

The Centre supports the positioning of Bradfield City Centre as one of Australia's major innovation ecosystems that co-locates organisations, institutions, and high technology industries to collaborate, innovate, and research and develop.

As home to the Advanced Manufacturing Research Facility, it can help the region's businesses tap into new global supply chains and expand their markets to rebuild Australian manufacturing.

In Unlimited Potential, we agree that agglomeration is key to industry development and activation and the driver of industry productivity through collaboration and learning.

We support the innovation, research and education focus of the master plan which is designed to support innovative sectors with high-value employment in areas such as advanced manufacturing, defence and aerospace.

In addition, the strategic co-location of new industries near universities; research institutions; Australia's national science agency, the CSIRO; and start-up incubators and accelerators will help with the generation and commercialisation of new ideas and innovations.

Recommendation 1: Actively attract investment and new industries to strategically co-locate near universities, research institutions, and start-up incubators at Bradfield to commercialise and scale up new ideas.

1.2 Jobs

The master plan estimates Bradfield City Centre will eventually generate about 20,000 new jobs. The focus on attracting advanced manufacturing jobs, leveraging the Advanced Manufacturing Research Facility, means many are likely to be high-paid, knowledge-intensive roles.^{iv}

The Centre argues a concentration of high-skilled jobs will have benefits for the region, creating additional demand for services and an ecosystem of connected industries, including small business suppliers. This will support nearby communities and grow neighbouring economic hubs.

Recommendation 2: Continue to focus on establishing Bradfield as Australia's leading centre of advanced manufacturing excellence.

1.3 Destination of choice

One of Western Sydney's advantages is its natural assets which anchor much of the region's tourism industry. Drawcards also include growing arts, culture, leisure, and sporting activities. The Western Sydney International Airport will be an international gateway to Bradfield and the rest of the region.

The Centre supports efforts to promote Bradfield as a "destination of choice" for travellers and businesses to build a new era of tourism-related industries.

Recommendation 3: Promote Bradfield as the international tourism gateway to destination Western Sydney.

2. Future skills

Bradfield has an opportunity to position itself as the nation's leading source of skilled workers with a range of in-demand capabilities that enable them to work across disciplines and industries.

The co-location of high-tech industries and education facilities, including shared TAFE and University hubs, will allow people to continually update their skills, training, and education throughout their lives.

This means Bradfield can lead the way in enacting recommendations from the Australian Universities Accord, including meeting high-impact skills needs through university and TAFE partnerships at speed.^v

Western Sydney has an increasingly educated population. Our [Untapped Talent](#) report in 2022 showed that 27.2 per cent of Western Sydney residents now hold a university degree, compared to 26.3 per cent nationally and 27.8 per cent across NSW.^{vi}

These figures, from the 2021 Census, demonstrate that the people of Western Sydney are an asset – they are young, skilled, and diverse.

But the region's surge in skills has not been matched with a corresponding wave of knowledge jobs. Importantly, this is something Bradfield is being deliberately designed to correct.

The Centre strongly endorses the master plan's emphasis on fostering partnerships between "industry, universities, vocational education and training (VET) providers and STEM schools to align skills with employer needs and drive innovation".^{vii}

In *Unlimited Potential*, we argue Western Sydney must develop "the future skills leap" to ensure people in the region have access to the skills, education, reskilling, and retraining they need throughout their lives for the high-paying, in-demand jobs of the future.^{viii} This is just as relevant for new industries as well as health and caring professions.

We therefore strongly support the inclusion of a permanent TAFE/VET facility and a multiversity campus.

We note the NUW Alliance (Western Sydney University, the University of NSW, the University of Newcastle, and the University of Wollongong) has signed a memorandum of understanding with the NSW Government to open a STEM University in the Aerotropolis in late 2026.

The NUW Alliance has also signed an MOU to establish an initial collaborative industry-led Advanced Manufacturing & Research Facility in Bradfield with staged growth and investment over the next 10 years.^{ix}

Recommendation 4: Adopt the planned education partnership model between universities, TAFE, and industry across the nation to provide greater access to new in-demand skills and lifelong learning.

3. Future communities

3.1 Indigenous Australians

Western Sydney has the highest number of Indigenous residents in any region in Australia, with generations of Indigenous people calling the region home.

The Centre welcomes the master plan's acknowledgement that a "unique opportunity exists to establish a platform for two-way knowledge sharing, to elevate Country and to learn from cultural practices that will create a truly unique and vibrant place for all".^x

The Centre encourages the Western Parkland City Authority to continue to engage with Indigenous residents and stakeholders in a meaningful way, both during the development and delivery of Bradfield. In *Unlimited Potential*, we stress that now is the time for the greater Western Sydney region to be an exemplar for the economic participation of Indigenous people.

We endorse the inclusion of dedicated cultural spaces, a city design that facilitates the connection to Country, and the proposed embedding of First Nations language across the city in consultation with Traditional Custodians.

The development of a completely new city, arising from a greenfields site, presents a long overdue chance for Traditional Custodians to share in how a metropolis is shaped.

The Centre also welcomes the planned provision of a specialised Aboriginal community health facility, specialised Aboriginal childcare centre, and an Aboriginal Cultural Centre.^{xi}

In addition, we support the Indigenous Business Hub (Yarpa) in the Western Parkland City for Indigenous businesses and entrepreneurs. Scope exists to ensure economic development opportunities for Aboriginal businesses are included in Bradfield, and dedicated procurement policies could be considered such as the Business Council of Australia's Raising the Bar initiative.

Western Sydney is a place where learning has taken place for tens of thousands of years, where the Darug, Eora, Dharawal and Wiradjuri People innovated and thrived for millennia. In *Unlimited Potential*, we stress that now is the time for the greater Western Sydney region to be an exemplar for the economic participation of Indigenous people. Bradfield can play an important role in leading that dynamic.

Recommendation 5: Continue engagement with Indigenous residents and stakeholders in a meaningful way, both during the development and delivery of Bradfield.

3.2 Future Bradfield residents

The master plan estimates that between 15,288 and 23,000 residents will live in Western Sydney's newest CBD up to and beyond 2056.

It anticipates the future population will be characterised by students and young workers who move to the city to take advantage of new jobs. The plan predicts most residents will live in family households.

It will also have a high proportion of lone households, Aboriginal and Torres Strait Islander people, and Culturally and Linguistically Diverse groups.

Given this, the Centre supports the master plan's efforts to foster a sense of belonging and social cohesion by ensuring the provision of community centres, cultural facilities, and sports and recreation facilities.

We note the master plan includes education facilities plus a community health hub, aged care facilities, a justice precinct, a community centre, sporting, cultural and civic facilities, and a minimum 100 place public childcare centre.^{xii}

The master plan calculates that for every 100 units, there will be 15 primary aged children and 10 secondary aged children. For every 100 separate houses, the number of students more than doubles.

But we urge future growth to be carefully planned for to avoid a situation where catch-up education facilities are needed down the track.

Recommendation 6: Constantly assess future population growth models in Bradfield to avoid catch-up services and vital infrastructure.

3.3 Housing

The master plan forecasts that by 2026, there will be 1,000 to 1,200 jobs in Bradfield and no residents. By 2036, the number of jobs is estimated to be 8,000 to 8,300 and 3,000 to 3,100 residents.

Over the long term, Bradfield will have 20,000 to 24,000 jobs and 15,000 to 23,000 residents.^{xiii}

The population of the Western Parkland City is expected to increase by 720,000 people to 1.88 million people by 2056. The master plan says this will create the need for an extra 300,000 dwellings.

Western Sydney is expected to accommodate nearly two-thirds of Greater Sydney's population growth over the next two decades. The region needs a mix of flexible housing options for people in differing social, cultural and economic circumstances.

Bradfield will deliver 10,000 apartments, with the opportunity to deliver diverse, affordable housing. Given housing in this new CBD will be close to amenities, the Centre urges a clearly defined target for affordable and social housing be outlined.

As we outlined in our [Home Truths](#) report in 2023, more than one-quarter of low-income households in Western Sydney experience severe or moderate rental stress.^{xiv}

A housing strategy prepared by MacroPlan for the master plan states: "It is estimated that there will be demand for about 66,000 apartments, accounting for 22% of total dwelling demand in the Western Parkland City over the years between 2021 - 2056."

"It is estimated that the current potential supply of apartments in the Local Government Areas (LGAs) in Western Parkland City is 27,000-54,000, which may be adequate in the short term but not in the long term."^{xv}

The Centre advocates for higher-density housing and critical transport infrastructure, particularly the Metro rail linking Bradfield and the Western Sydney Airport. It is paramount this housing includes social and affordable dwellings managed by community housing providers, to contribute to addressing the expected 10-year-plus waiting time for social housing in many parts of Western Sydney.^{xvi}

As outlined in Home Truths, the NSW State Government must set and report clear targets for social and affordable housing development at a local government level, informed by current and projected demand.

In addition, health, education and innovation precincts such as those proposed for Bradfield and near the Aerotropolis must incorporate affordable housing development for key workers to ensure the retention of frontline and essential workers such as nurses, police and teachers.

Recommendation 7: Health, education and innovation precincts such as those proposed for Bradfield and near the Aerotropolis must incorporate affordable housing development for key workers to ensure the retention of frontline and essential workers such as nurses, police and teachers.

3.4 Liveability

The Bradfield master plan outlays a vision for one of the world's most advanced and vibrant cities, with a focus on safe, green, pedestrian and cycle-friendly spaces.

Most parts of the city will be within a five-minute walk from the new Metro station.

The Centre's report, [Liveability](#) in Western Sydney, focused on how investments in public spaces can have a transformational impact on the lives of residents.

This includes:

- Green infrastructure and public open spaces – improvements in air quality, access to public open spaces, walkability, and heat vulnerability.
- Community infrastructure – improvements in community participation in sport, arts and cultural activities.
- Walkability – improvements in social connectedness, health outcomes and perceptions of safety.^{xvii}

We applaud the master plan's attention to liveability and the initiatives it has put forward for the city.

We hope many of these will become the best practice benchmark in future developments. This includes the extensive greenery and parkland spaces as well as solar access, comfort and protection from wind and sounds.

Recommendation 8: Encourage other jurisdictions to adopt best practice liveability initiatives planned for Bradfield so all Australians have high-quality amenities and quality of life.

3.5 Transport

The ability of residents to make the most of their economic, educational and social opportunities is directly tied to the ease at which they can travel.

The Centre has long advocated for affordable, connected, accessible and public transport for residents.

Historically the system has been designed to connect the West to the East but we believe greater steps are needed to link the Macarthur, North-West and Western Sydney International Airport to the region.

We are also keen to see further routes connecting Bradfield to Western Sydney's growth centres, beyond the five on the drawing board:

- Penrith to Aerotropolis

- Liverpool to Aerotropolis
- Campbelltown to Aerotropolis
- Blacktown to Science Parl / Luddenham Metro
- Parramatta to Bonnyrigg.^{xviii}

Transport infrastructure is also a critical productivity enabler. The Aerotropolis will connect new and existing industries with large, global supply chains through logistics facilities.

Bradfield's prime location next to the new airport, and several key roads and infrastructure corridors including Bringelly Road, Badgerys Creek Road, Elizabeth Drive, M12 and The Northern Road enhance its location for new industries.

When operational, the journey on the Sydney Metro Western Sydney Airport line between St Marys and Bradfield will take 20 minutes.

The master plan shows the line will run through six stations:

- St Marys – interchanging with the existing suburban railway station and connecting customers with the rest of Sydney's rail system
- Orchard Hills – to service a future commercial and mixed-use precinct
- Luddenham – to service a future education, innovation, and commercial precinct
- Western Sydney International Airport – two stations to service the terminal and the business park
- Bradfield – to service the commercial heart of the Western Sydney Aerotropolis.

The Centre strongly supports the Metro line, and its impact on the region by removing 110,000 car journeys a day off local roads from 2056. As discussed earlier, it will also be important in attracting high-density accommodation.

Land has been gazetted for future Metro extensions to connect St Marys to Schofields/Tallawong to the north and Bradfield to Macarthur in the south.

We back as sensible the provision of a special purpose major infrastructure corridor to accommodate a possible future East West Rail Line connecting Greater Parramatta to Bradfield and the Western Sydney International Airport.

This project would ensure the new airport can truly service the people of the region and better connect the growth centre of Parramatta to the Western Parkland City.

The airport is expected to cater to 37 million passengers a year and accommodate half of Sydney's international air travel demands.^{xix}

Recommendation 9: Move from Rapid Buses to rail routes as quickly as practicable to join up growth centres in Western Sydney with Bradfield, the Western Sydney International Airport and the Aerotropolis. Undertake a feasibility study into the East West Rail Line to give investors certainty, and map out the route.

3.6 Sustainability

The Centre believes Bradfield's bold environmental commitments, including net zero energy and water systems, should become the benchmark in national urban planning.

This includes green corridors, tree canopy cover, innovative and resilient building materials, environmental regeneration, restoring waters and rebuilding biodiversity.

Bradfield can lead the way in sustainability, especially with its focus on being water neutral, having no waste to landfill and the extensive use of solar panels.

The master plan's emphasis on designing to meet the challenges of Western Sydney's climate, where maximum temperatures are 6-10 degrees higher than those in the eastern suburbs and inner-city, also needs to be adopted across the region.^{xx}

Recommendation 10: Encourage other jurisdictions to look to Bradfield's initiatives on net zero energy and water systems to adopt them in new developments.

3.7 Art and cultural activities

In 2023, the Centre launched its landmark [State of the Arts in Western Sydney](#) report, which called for a commitment to minimum per-capita funding for arts and culture in Western Sydney based on population distribution across three tiers of government.

It also called for critical research to be funded and commissioned into Indigenous arts and culture in the region, and to establish local, high-quality arts education, training, employment and business development pathways to deliver the artistic and creative skills required for the future of Western Sydney.^{xxi}

We believe Bradfield's commitment to public art in all aspects of its design, including on public spaces such as parks, streetscapes and buildings, is an important foundation stone in developing the region as an epicentre of arts and culture. However, it is important to recognise that public art is not a substitute for the requirement for long-term cultural infrastructure and creative spaces in Bradfield.

Recommendation 11: Adopt the State of the Arts recommendation for a commitment to minimum per-capita funding for arts and culture based on population distribution across three tiers of government. This should begin with the development of a dedicated arts and cultural strategy for Western Sydney and ongoing funding for the Western Sydney Arts Alliance.
Adopt the State of the Arts recommendation to undertake a feasibility study for developing cultural precincts and creative industry clusters in Bradfield benchmarked against access to finance, access to talent, innovation, infrastructure and access to wider markets.

Conclusion

The Centre for Western Sydney sees the Bradfield City Centre as an integral part of Western Sydney's economic and social transformation.

For the region to leap ahead and realise its potential at the forefront of innovation, creativity, technology, new jobs and new industries, Bradfield needs to be developed as a magnet for global investment, skills and ideas.

We believe the Bradfield master plan gets the balance right. It puts forward a design for a new city from scratch to drive future industries while meeting the needs of people who will live in and surround the CBD.

The Centre strongly argues that the success of Bradfield depends on all stakeholders – business, community groups, education institutions and political leaders – putting aside their differences to realise this unique opportunity.

Attracting international investment is the key to getting Bradfield off the ground, and positioning it as a centrepiece of Western Sydney's future as a world-leading economic powerhouse.

This will serve as a catalyst for the region, delivering a stronger, fairer community where people in Western Sydney have jobs closer to where they live, more take-home pay, improved services such as schools, hospitals and transport, and their children and grandchildren can access the jobs of the future.

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- ⁱ Western Parkland City Authority (WPCA), Bradfield City Centre Master Plan Application (BCCMP), Planning Report, October 2023, page 40
- ⁱⁱ WPCA, BCCMP, WPCA Master Plan Social Infrastructure Strategy, October 2023, page 3
- ⁱⁱⁱ WPCA, BCCMP, WPCA Master Plan Social Infrastructure Strategy, October 2023, page 4
- ^{iv} WPCA, BCCMP, Economic Strategy and Impact Assessment Report, October 2023, page 46
- ^v Australian Universities Accord final report, 2024, page 101
- ^{vi} Centre for Western Sydney, Untapped Talent, October 2022, page 3
- ^{vii} WPCA, BCCMP, Site Specific Development Controls, October 2023, page 33.
- ^{viii} Centre for Western Sydney, Unlimited Potential, February 2024, page 7.
- ^{ix} WPCA, BCCMP, WPCA Master Plan Social Infrastructure Strategy, October 2023, page 40.
- ^x WPCA, BCCMP, Site Specific Development Controls, October 2023, page 2.
- ^{xi} WPCA, BCCMP, Site Specific Development Controls, October 2023, page 24.
- ^{xii} WPCA, BCCMP, Site Specific Development Controls, October 2023, pages 162 and 163.
- ^{xiii} WPCA, BCCMP, Housing Strategy, Summary Statement, October 2023, page 3.
- ^{xiv} Centre for Western Sydney, Home Truths, 2023.
- ^{xv} WPCA, BCCMP, Housing Strategy, Summary Statement, October 2023, page 3.
- ^{xvi} Centre for Western Sydney, Home Truths, 2023.
- ^{xvii} Centre for Western Sydney, Liveability in Western Sydney, December 2022.
- ^{xviii} WPCA, BCCMP, Transport Management Accessibility Plan Report, October 2023, page 84.
- ^{xix} WPCA, BCCMP, WPCA Master Plan Social Infrastructure Strategy, October 2023, page 4.
- ^{xx} WPCA, BCCMP, Urban Design Report, September 2023, page 50.
- ^{xxi} Centre for Western Sydney, State of the Arts, 2023, page 8.



04 March 2024

Department of Planning, Housing, and Infrastructure

Submitted via NSW Planning Portal Have Your Say.

To whom it my concern,

Bradfield City Centre Masterplan

Western Sydney University (**Western**) welcomes the opportunity to respond to the Department of Planning, Housing, and Infrastructure's (**DPHI**) Bradfield City Centre Masterplan (**the Plan**).

As the region's leading higher education provider, Western is seeking to establish a presence within the Bradfield City Centre. Working in partnership with government and industry, Western is seeking a primary tenancy within the Advanced Manufacturing Research Facility (**AMRF**).

Western will develop new platforms for education and cross disciplinary research, supporting knowledge jobs targets in Bradfield and the broader Aerotropolis, by providing focussed, competitive micro-credentials, and leading research collaboration. These operations will scale up in the long-term and expand on our existing initiatives including the Agri-Tech Precinct at the Hawkesbury campus and the Factory of the Future at the Bankstown City Campus.

Western commends the designation of an Innovation, Research and Education Precinct in the Masterplan, and the focus on connectivity, activation, and social and cultural infrastructure.

The Masterplan envisages 10,000 residential dwellings and over 20,000 jobs by 2056. Most of these jobs will be knowledge intensive, surpassing the proportion of knowledge intensive jobs currently in the Sydney CBD or Parramatta CBD. Whilst this is ambitious, the overall jobs density compared to Greater Sydney (2016 data) is relatively low and does not account for targeted employment growth in Greater Sydney to 2036 (per Council LSPS) or beyond.

Western believes that the Plan provides significant opportunity to establish a thriving collaborative City Centre with strong industry, education, and investment outcomes. The co-location of education and industry requires strong density targets and increased job figures to enable economic transformation and to capitalise on global investment attraction. Collaboration between universities, industry, and research through the AMRF, AIH and other initiatives will greatly benefit from strong employment targets, and the subsequent benefits which this provides.

If you require any further information, please do not hesitate to contact Michelle Lee, Director, Estate Planning and Strategy on 0431 983 100, or at michelle.lee@westernsydney.edu.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Bill Parasiris', with a stylized flourish at the end.

Bill Parasiris

Vice President, Infrastructure and Commercial
Western Sydney University



Action for Public Transport (N.S.W.) Inc.

P O Box K606
Haymarket NSW 1240
4 March 2024

Director - Assessments
Department of Planning, Housing and Infrastructure
Parramatta NSW 2124
Submitted via website

Submission on draft Bradfield City Centre Master Plan

Introduction

Who we are

Action for Public Transport (NSW) or "APTNSW" is a transport advocacy group which has been active in Sydney since 1974. We promote the interests of beneficiaries of public transport - passengers and the wider community alike.

Discussion

Appendix A

We agree with emphases on design, vegetation, street frontages, permeability and other attributes to create a welcoming non-car-based urban centre.

Appendix G - the Transport Management Accessibility Plan Report

Overall this document is commendable in advocating a major role for public transport, in contrast to many greenfield urban developments to date. Perhaps it recognises changed economic and environmental imperatives, noting this is Sydney's first urban centre to be planned as a greenfield site.

P.4 We approve a longer term planned extension of Metro northwest to Schofields, hence connecting to the Richmond line, and south to the greater suburban network.

P.26 We approve requirements that schools, local and higher centres etc. be located on bus routes (though in practice the centres will come before the routes).

P.36 "A potential new east-west mass transit corridor will connect the Western Parkland City to the Central River City". That's fine, but can we please see it in other planning documents such as the Future Transport series?

P.39 SW Rail link extension to Aerotropolis (Bradfield), 6 minute frequency by 2036. Presumably this would be an extension of Sydney Metro from Bankstown - please clarify.

Rapid bus routes Aerotropolis to Parramatta, Penrith, Campbelltown etc. 15 min headway by 2026, 10 min by 2036 "subject to future customer demand and funding availability." There has been considerable publicity recently since the opening of the Rozelle underground interchange with consequent traffic congestion on

Victoria Road. Delays to buses on Victoria Road have received less attention but are actually more important to public transport. Is it envisaged that the Aerotropolis rapid bus routes will be kept away from traffic congestion caused by single-occupant cars?

P.45 Special Purposes infrastructure corridor (SP2) north-south through site. "A decision regarding future rail infrastructure in the corridor is the subject of review by Government." All lines and station appear to be underground. We recommend that the rail corridor through Bradfield, the Aerotropolis area and the airport terminals be wide enough for four tracks (two tracks each metro and double-deck). So should be the stations. This may be the intention but the draft Plan needs clarification.

Construction of suburban heavy rail (double-deck) from Bradfield to Airport should be considered, parallel to Metro, avoiding change at Bradfield on these journeys.

P.74 - only a medium sustainable mode share target is seen as feasible for medium term, 2036. However we approve longer term projected public transport mode share rise (Table 20).

We note (see various bus route maps) that no urban development seems currently planned to west of Bradfield. Is this likely to continue as rural land? If not, transport corridor requirements from Bradfield centre should be planned.

Chapter 7 (Travel Demand Management): we approve principles of limiting unnecessary car trips, encouraging walking, cycling public transport including in urban design.

Jim Donovan
Secretary
Action for Public Transport (NSW) Inc.

Submission on Bradfield City Centre Master Plan

The Committee for Sydney thanks the NSW Government for the opportunity to provide a submission on the recently released Bradfield City Centre Master Plan.

Bradfield, and the Aerotropolis more broadly, is an important part of Sydney and NSW's long term economic development. It is vital that as a new city centre, it maximises the opportunities to support a range of industries, future residents and cultural roles. The Committee for Sydney recognises that the realisation of the Master Plan will take place over decades, and that this document is an important starting point for this vision to be realised.

We also recognise the immense amount of work that has gone into the development of the Master Plan and wider vision, with many years and multiple supporting technical reports contributing to its development. Our submission identifies four key considerations of the Master Plan itself and the process, rather than providing technical comment on any of the supporting documents.

Introduction

The Committee for Sydney is the city's peak advocacy and urban policy think tank. We are an independent non-partisan organisation with more than 160 members. We are advocates for the whole of Sydney, developing solutions to the most important problems we face. Our goal is to help our city be the best in the world.

Key issues that require investigation

Our submission highlights four strategic issues for the Western Parkland City authority to consider regarding the Bradfield City Centre Master Plan.

Affordable Housing clarity

The Planning Report makes mention of the aspiration to provide Affordable Housing in the Bradfield City Centre, but does not identify specific targets. Instead, language such as '...optimises the opportunity to provide diverse, affordable housing...' (p6), '...provide the opportunity to provide key affordable housing...' (p43), 'Residential uses, including affordable housing...' (p51) and 'In accordance with NSW Government policy a proportion of the residential dwellings will be affordable housing.' (p72).

While this indicates that affordable housing will be provided at some point, it is unclear how much will be, when it will be or by when.

It is the NSW Government's stated policy that on Government-owned land, a minimum of 30% of housing will be affordable, social and universal. As the site of the Bradfield City Centre is government-owned, and there is a continued call for an increased supply of affordable housing in Greater Sydney, The Committee for Sydney believes that the Master Plan should be more explicit in articulating its affordable housing target for the City Centre to ensure it is seen as delivering on its pre-election commitment and to be leading the way in developing diverse, inclusive communities.

The Committee for Sydney recommends including in the Master Plan and Planning report a specific commitment regarding the delivery of a minimum of 30% affordable, social and universal housing in the Bradfield City centre.

Better reflect the evolutionary nature of City Centre development and reserve highest and best land use

The Bradfield Master Plan presents a vision of a mature, long established commercial and mixed-use City Centre. While this is an important element to long-term vision setting, it does not reflect the evolutionary steps that centres of this scale go through before they reach maturity.

The Bradfield City Centre has often cited other areas of Sydney such as Parramatta and Surry Hills as places to draw inspiration from. These, however, have undergone multiple iterations of their urban, social and economic roles before becoming the places they are today.

It is important that the Master Plan reflects the necessarily iterative nature of urban development, rather than just arrive at a final state. This is important for several reasons:

- There is risk that moving towards a 'highest and best use' model that invariably includes significant residential development will likely exclude other critical, but perceived 'low' value uses like industrial and manufacturing uses.
- The preliminary strength of the Bradfield and Aerotropolis economic proposition is its focus on advanced manufacturing and associated industries. Moving to a higher value commercial and residential model from the outset may limit the ability for these industries and their institutional partners to establish and set up the Aerotropolis' competitive advantage.
- The long-term nature of the master plan realisation requires a degree of flexibility to adapt to changing industry needs. Leading with a final state master plan, without interim or evolutionary steps, limits the ability for Bradfield to respond.

The Master Plan should recognise the iterative nature of Bradfield's development and present a likely land use sequencing strategy that arrives at the Master Plan's end state. This could include identifying land parcels that may be able to accommodate lower value early-stage land uses such as advanced manufacturing and logistics, that take up large land parcels but that can turn over and intensify as the City Centre developments. This is reflected in the Economics Report (Appendix O, Section 6.2 and Recommendation 1), but does not translate into the Master Plan itself.

This has the added value of enabling Bradfield to come to market sooner with industries directly aligned with its early-stage competitive advantages and industry vision, while not precluding the Master Plan from being realised over the longer term. This could be supported by innovations such as sunset clauses on development consents in recognition of the City Centre's desired end state or the retention of the sites in freehold ownership by the Government, with long-term ground lease models applied (as currently occurs for commercial development at Sydney Olympic Park) to provide long term land use flexibility.

The Committee for Sydney recommends a horizons-based approach to the sequencing of land parcel development and land use to retain long term adaptability, with a focus on commercial and industrial in earlier stages and residential as a longer-term land use.



Role of other Western Sydney centres and precincts

It is understandable that the Master Plan for Bradfield does not have a focus on centres outside of the Aerotropolis. This comment from the Committee for Sydney is intended to help inform the NSW Government's wider approach to the economic development Western Sydney.

The Master Plan is silent on the role that Bradfield plays in a broader network of Strategic and Metropolitan Centres across Western Sydney. It is essential that in the desire for Bradfield to develop as a City Centre in Western Sydney, the NSW Government recognises the instrumental role that the established centres of Penrith, Liverpool and Campbelltown and the Mamre Road precinct play in the growth of the Aerotropolis, particularly in the attraction of early-stage commercial and industrial development, where these centres already have a critical mass of commercial and institutional clustering.

The Committee for Sydney recommends that the WPCA ensure the major centres of Penrith, Liverpool and Campbelltown are the recipients of commercial development in the early stages and that the Government continues to commit to servicing Mamre Road to increase the supply of industrial land to ensure they can continue to grow to support the Aerotropolis as well as contribute to job growth in Western Sydney.

Infrastructure funding strategy

The Master Plan has what appears to be a detailed infrastructure contributions plan in support of it (Appendix V). The Committee for Sydney recognises how important it is to ensure that funding of all infrastructure – including social and cultural infrastructure – is appropriately accounted for as development progresses.

It is important that funding also provides an operational funding stream in addition to capital funding, to ensure that it can provide the required civic functions on an ongoing basis.

The Committee for Sydney recommends that the WPCA ensure that there is sufficient funding allocated through infrastructure contributions for the sustainable ongoing operations of proposed social and cultural infrastructure.

Thank you

Thank you again for the opportunity to provide input into the Bradfield City Centre Master Plan. We encourage the government to continue working with stakeholders and would appreciate the opportunity to comment on the final draft Master Plan prior to finalisation.

Should you have any questions or want to discuss our submission in more detail, please do not hesitate to reach out to Jeremy Gill, Head of Policy, via jeremy@sydney.org.au.

4 March 2024

Department of Planning, Housing and Infrastructure
12 Darcy Street
Parramatta NSW 2150
Via submission portal

Submission: Bradfield City Centre Master Plan

The Community Housing Industry Association NSW (CHIA NSW) welcomes the opportunity to provide feedback on the draft master plan for the Bradfield City Centre.

CHIA NSW represents 95 registered, not-for-profit community housing providers (CHPs) in NSW. Our members currently own or manage more than 54,000 homes across NSW for individuals and families who cannot afford to rent or purchase a home on the private market. Since 2012, community housing providers have delivered nearly 5,800 new homes across NSW, representing an investment of over \$2 billion.

CHIA NSW is supportive of the vision to create a thriving mixed-use precinct at Bradfield City Centre. However, it is disappointing that the draft master plan does not include any provisions to secure social and affordable homes. With capacity for 10,000 dwellings within the precinct, this is a missed opportunity.

Alongside major transport, open space and community facilities, social and affordable housing is critical infrastructure that will assist with realising the social and economic objectives of the Aerotropolis and the broader Western Parkland City.

The provision of social and affordable housing will ensure people in low to moderate income jobs that are essential to supporting the Aerotropolis can live in proximity to their work. This includes airport personnel, retail and hospitality staff, health and childcare workers and other essential service workers.

Social and affordable rental housing supply is not keeping pace with population growth or demand. By 2041, the supply gap in South-Western Sydney could be as high as 28,600 homes – an increase of 54% over the current supply gap of 18,600 homesⁱ.

The scale of the supply gap for housing which is affordable to people in the lowest income groups clearly warrants the attention of all levels of government. The delivery of affordable housing needs to be a central pillar of the planning for the Aerotropolis, both to support the economic productivity of the area and to ensure development does not erode housing affordability for low-income households in the region.

Simply increasing the supply of homes on the market, no matter how ambitious the targets, will not reduce housing costs sufficiently for those on the lowest incomes. This is evident from a consideration of recent supply trends.

Between 2006 and 2021 the number of homes in NSW increased by 23.1%, outstripping the 17.4% increase in householdsⁱⁱ. Despite this, housing became more expensive. Median rents increased by 83% and property prices increased by 116%ⁱⁱⁱ. This outpaced the rise in median household income of 77%^{iv} and inflation of 38%^v. As a result, housing was further pushed out of the reach of lower income households.

While the initial Western Sydney Aerotropolis Precinct Plan, exhibited in November 2020, proposed a minimum 5% affordable housing requirement, no mechanisms for securing this exists in the current planning framework.

CHIA NSW strongly recommends that the master plan includes a requirement for social and affordable housing to be included as part of any residential or mixed-use development within the Bradfield City Centre. Employment-generating development should also be required to provide a monetary contribution towards affordable housing, particularly where the development is expected to generate low-income jobs – given the need for affordable housing that will result.

This would be consistent with the NSW Government’s commitment under the National Planning Reform Blueprint to phase in inclusionary zoning to support permanent affordable, social and specialist housing.

Affordable housing contribution requirements are an efficient and effective means of securing affordable housing. They provide certainty to the community and developers, enabling local councils to plan for and fund affordable housing in partnership with not-for-profit organisations, such as CHPs.

Feasibility concerns can be addressed by phasing in requirements over time to allow the market to adjust. Internationally, as well as in NSW, it has been demonstrated that a broad-based contribution requirement does not impede development, as developers incorporate the contribution into the land purchase price.^{vi} The Centre for International Economics, in its evaluation of infrastructure contributions reforms in NSW, also concluded that over time, infrastructure costs will be factored into lower land values, rather than higher housing prices.^{vii}

While a lower requirement may be necessary in the initial years of a scheme, given development feasibility constraints, a higher target is likely to be supported in the future as development returns increase and requirements are costed into land purchases.

CHIA NSW recommendation:

- Include a minimum 5% affordable housing requirement in the Bradfield City Centre master Plan. This should apply to residential, mixed-use and employment generating development.

CHIA NSW appreciates the opportunity to provide feedback on the draft master plan. Please don’t hesitate to get in touch if you require any further information about this submission.

CHIA NSW looks forward to continued engagement with the NSW Government on planning reforms.

Kind regards,



Michael Carnuccio
Manager - Policy
CHIA NSW

References

ⁱ South West Sydney SA4 from Quantifying Australia's unmet housing need - Regional snapshots (December 2022) Prepared for the Community Housing Industry Association by Ryan van den Nouwelant, Laurence Troy, and Balamurugan Soundararaj; UNSW City Futures Research Centre.

ⁱⁱ Based on a comparison of Census data.

ⁱⁱⁱ Based on a review of DCJ Rent and Sales Reports.

^{iv} Based on Census data.

^v ABS Consumer Price Index.

^{vi} Gurrán, N., Gilbert, C., Gibb, K., van den Nouwelant, R., James, A. and Phibbs, P. (2018) *Supporting affordable housing supply: inclusionary planning in new and renewing communities*, AHURI Final Report No. 297, Australian Housing and Urban Research Institute Limited, Melbourne.

^{vii} The Centre for International Economics, (2020) *Evaluation of infrastructure contributions reform in New South Wales - Final Report*, prepared for the NSW Productivity Commission.

Shelter NSW submission on the *Bradfield City Centre Masterplan – (Feb 2024)*

A secure home for all

4 March 2024



About Shelter NSW

Shelter NSW has been operating since 1975 as the State’s peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides secure homes for all. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality.

We are especially concerned for low-income households which struggle to afford good quality and well-located housing in the private market. We consider a sustainable housing system one that delivers what we call Triple-A housing and Triple-P outcomes:

Affordable and diverse homes	Accessible, well-located housing	Appropriate, high-quality development
Housing supply and demand	Proximity to jobs and services	Amenity and aesthetics
Tenure forms and rights	Access to public transport	Energy and environment
Housing types and sizes	Accessibility and adaptability	Standards and maintenance
Productive cities and regions	Poverty-free communities	Protected neighbourhoods
Access to jobs and services	Housing stress and homelessness	Energy use and consumption
Housing costs and consumption	Physical and mental health	Urban heat
Financial and economic stability	Education access and attainment	Climate resilience and adaptation

Shelter NSW has consistently called for the rebuilding of the state’s stock of social housing (public and community)¹ to provide for those low-income people unable to compete in the private housing market. The medium-term return to 5% of all housing stock (and 10% by 2040) would create a reliable safety net, substantial asset base and critical infrastructure for a growing population. Social housing stock of this size would create a genuine alternative to those struggling in the precarious and unaffordable private rental market.

Shelter NSW has also called for the expansion of affordable housing, in addition to social housing not instead of it. We have consistently called for the NSW Government to ensure that any housing supply growth is accompanied by requirements for social and affordable housing. We are strong advocates for a regulated definition of affordable housing according to the EP&A Act, 1979, appropriately priced for very low (less than 50% of median income), low (50 – 80% of median income), moderate income (80 – 120% of median income) households, with an expectation of paying no more than 30% of gross income on rent².

Shelter NSW commends the NSW Government for its recognition of the impact of the housing crisis and its commitment to make change; and notes the Government’s commitment to deliver 30% social/affordable housing on any public land that it redevelops for residential purposes.

¹ [221206_Shelter-NSW-2023-State-Election-platform.pdf \(sheltersnsw.org.au\)](https://www.sheltersnsw.org.au/221206-Shelter-NSW-2023-State-Election-platform.pdf)

² s1.4 of Environmental Planning & Assessment Act 1979; cl. 13 of State Environmental Planning Policy (Housing) 2021

1. Executive Summary

Shelter NSW (Shelter) welcomes and appreciates the opportunity to comment on the exhibited Bradfield City Centre Masterplan³, which sets out a draft planning framework for an entirely new city centre⁴ which will be the core precinct for the development of the Western Sydney Aerotropolis⁵ and broader Western Sydney through which the Sydney Metro Western Sydney Airport line (commencing in 2026) will cross⁶.

Shelter notes the Aerotropolis Masterplan has evolved out of earlier iterations. Shelter previously raised specific concerns to provide social and affordable housing at a scale proportional to growth envisaged in the Western Sydney Aerotropolis in both 2021 and 2022⁷.

In these earlier submissions, Shelter reflected on the apparent exclusion of any meaningful action to support the housing needs of people on low-moderate incomes who are expected to live and work in the Aerotropolis. Shelter called for safeguards, by way of proactive commitments and actions by the NSW Government, so that the private housing market will be rendered affordable for essential workers and lower income households and or insecure wages⁸.

³ Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

⁴ WPCA (October 2023). Bradfield City Centre Master Plan Application Housing Strategy – Summary Statement. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/29.+Appendix+BB+20231020+Housing+Strategy+Statement+Report.PDF

⁵ Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

⁶ Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

⁷ Shelter NSW Submission (2021) Submission on Initial Place-based Infrastructure Compact for the Western Parkland City. Retrieved from: <https://shelternsw.org.au/wp-content/uploads/2021/02/Shelter-NSW-Submission-PIC.pdf> and Shelter NSW Submission (31 March 2022). Submission on the Draft Western Parkland City Blueprint. Retrieved from: https://shelternsw.org.au/wp-content/uploads/2022/04/220331_WPC_Blueprint_Submission_SM_template-1.pdf

⁸ *ibid*

The current iteration of the Bradfield City Centre Master Plan now exhibits changes to planning controls including to the exhibited SEPP (Precincts-Western Parkland City) 2021, Western Sydney Aerotropolis Precinct Plan and Western Sydney Aerotropolis DCP – Phase 2. Shelter NSW’s current submission (and the third made by Shelter overall) specifically concerns itself with an assessment of the intent and merits of the Bradfield City Centre Master Plan and its capacity to effectively generate genuine social and affordable housing within a city centre intended to facilitate growth, including up to 15,200 residents; the majority in high density unit housing⁹, 24,000 jobs and 10,000 dwellings from 2026 through to 2056¹⁰. An artist’s impression of the Bradfield City Centre is provided in **Figure 1**.



Figure 1: Photomontage of the Bradfield City Centre in context of high density apartment living planned around the Aerotropolis metro station. Source: WPCA Planning Report. Retrieved from https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

Shelter asserts there is no adequate Master Plan response to guide delivery of opportunities for key affordable housing development despite the significantly increased densification and total housing capacity within the Bradfield City Centre of the Western Sydney Aerotropolis¹¹

⁹ GHD (October 2023). Bradfield City Centre Master Plan Application WPCA Master Plan Social Infrastructure Strategy. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/15.+Appendix+N+-+20231020+Social+Infrastructure+Strategy+Report.PDF

¹⁰ Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

¹¹ ibid

Shelter notes the Bradfield City Centre site, measuring 114.6 ha in area, is a Commonwealth government owned greenfield site¹², within the Liverpool LGA.

The Western Parkland City Authority (WPCA) is the NSW Government Agency responsible for delivering, coordinating and attracting investment to the Western Parkland City. A key component is the delivery of the Bradfield City Centre.

The WPCA (proponent) was granted permission by the (then) NSW DPE to prepare a master plan for the Bradfield City Centre¹³. The Department of Planning, Housing and Infrastructure (DPHI) is the assessing authority for the exhibited Master Plan.

The proponent's Planning Report¹⁴ sets out the justification (Master Plan responses) to the proposed statutory amendments to allow for future development within the Bradfield City Centre¹⁵.

However, as exhibited¹⁶, Shelter is unable to locate any enabling framework and or evidence based assessment in the exhibited documentation which includes the Planning Report and or its conclusions any or any supporting technical report in the appendices and or their conclusions to justify strategic and site specific merit by the Master Plan in relation to social and affordable housing.

Social and affordable housing outcomes are only achievable where an effective enabling framework set standards for implementation. Upon examination, the technical assessment for social and affordable housing in the exhibited Master Plan¹⁷ amounts to:

The Master Plan has the capacity to accommodate ~10,000 residential dwellings. In accordance with NSW Government policy a proportion of the residential dwellings will be affordable housing.

Shelter notes there is no Master Plan informed response to considerations of social and affordable housing need and or assessment of any kind associated with the significant densification, population influx, total housing capacity and economic drivers from major projects and infrastructure associated with the Western Sydney Aerotropolis in the exhibited Master Plan^a. Further, there is no adequate Master Plan response in the exhibited Master Plan to include an appropriate component of housing affordable for very low to moderate income earners.

¹² Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

¹³ SGS Economics and Planning (October 2023). Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF

¹⁴ Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

¹⁵ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

¹⁶ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

¹⁷ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

The, as exhibited Master Plan,¹⁸ reveals a lack of due regard for adequate and informed consideration of critical social and affordable housing provision and the lack of any statutory mechanisms and or procedures to realise this vision cannot result in an equitable outcome shared by all parts of a new community, positioned to be the major centre within the Aerotropolis Core Precinct, within the wider Western Sydney Aerotropolis¹⁹.

Further, adequate social and or affordable housing responses for a population of over 15,000 based on housing targets²⁰, which amounts to approximately 64% of the wider Aerotropolis precinct²¹, within the key anchor centre for the development of the Aerotropolis and broader Western Sydney²² is not just a welfare policy response given the 20,000 + jobs²³, (50% of the Aerotropolis Core employment target²⁴) as a key employment centre to Western Sydney²⁵.

The Bradfield City Centre Master Plan as exhibited²⁶ is incapable of creating a regulatory framework and any pre-requisite conditions to embed delivery of social and affordable housing within the Bradfield City Centre.

Further, the Bradfield City Centre Master Plan as exhibited²⁷ provides no rationale to evaluate what proportion of the 10,000 dwellings should apply as affordable for low to moderate income households within the Bradfield City Centre.

The exhibited Master Plan is fundamentally flawed without a coherent statutory planning framework to realise a vision to compel government to act to address social and affordable housing needs and cannot be viewed as promoting the public interest.

A strong objection is raised to the exhibited Master Plan which should be refused in its current form.

¹⁸ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

¹⁹ SGS Economics and Planning (October 2023). Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF

²⁰WPCA (October 2023). Bradfield City Centre Master Plan Application Housing Strategy – Summary Statement. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/29.+Appendix+BB+-+20231020+Housing+Strategy+Statement+Report.PDF

²¹ SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF

²² SGS Economics and Planning (October 2023). Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF

²³ ibid

²⁴ SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF

²⁵ ibid

²⁶ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

²⁷ ibid

2. Key Issues

2a. Strategic Planning Framework

Shelter notes the Aerotropolis Masterplan has evolved out of earlier iterations to which it raised specific concerns in relation to affordable housing provision in both 2021 and 2022²⁸. In the submissions, Shelter called for proactive commitments and actions by the NSW Government to provide social and affordable housing at a scale proportional to the growth envisaged, without which the private housing market will be unaffordable for essential workers and people on low or insecure wages²⁹.

The current iteration of the Bradfield City Centre Master Plan exhibits changes to planning controls including to the exhibited SEPP (Precincts-Western Parkland City) 2021, Western Sydney Aerotropolis Precinct Plan and Western Sydney Aerotropolis DCP – Phase 2.

²⁸ Shelter NSW Submission (2021) Submission on Initial Place-based Infrastructure Compact for the Western Parkland City. Retrieved from: <https://shelternsw.org.au/wp-content/uploads/2021/02/Shelter-NSW-Submission-PIC.pdf> and Shelter NSW Submission (31 March 2022). Submission on the Draft Western Parkland City Blueprint. Retrieved from: https://shelternsw.org.au/wp-content/uploads/2022/04/220331_WPC_Blueprint_Submission_SM_template-1.pdf

²⁹ *ibid*

Shelter NSW's current submission primarily concerns itself with an assessment of the intent and merits of the Bradfield City Centre, and its capacity to effectively generate genuine social and affordable housing.

Shelter has reviewed the exhibited Master Plan³⁰ in detail but can find no adequate quantitative or qualitative assessment in any of kind for social and affordable housing provision in the exhibited documentation³¹. This is despite the significantly increased densification within the Bradfield City Centre within the Aerotropolis³² which has the capacity to accommodate 10,000 residential dwellings.

Further, while it is appreciated from the exhibited Master Plan, *future analysis of data sets will need to be updated according to population projections and market demand for housing, refining the overall number of dwellings in the Aerotropolis*³³, affordable housing will require pre-requisite conditions before it can be delivered and any proportion decided upon requires considered assessment alongside the details of the exhibited Master Plan³⁴.

2b. Statutory Planning Framework

The Master Plan responses as exhibited need to adequately inform the objectives and requirements of the Bradfield City Centre (Aerotropolis) planning framework and hierarchy of plans to realistically leverage for much needed affordable housing to support the 'work near home' opportunity for all³⁵ as intended within the Bradfield City Centre. Findings show otherwise detailed as follows:

Western City District Plan Planning Priorities assessment

The Western City District Plan sits under the Greater Sydney Region Plan: A Metropolis of Three Cities and strategically sets out the housing and jobs targets for the area³⁶ detailed as planning priorities. The key objective for affordable housing for the Bradfield City Centre Master Plan is Planning Priority W5 described as providing housing supply, choice and affordability with access to jobs, services and public transport³⁷.

³⁰ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

³¹ WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

³² ibid

³³ WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

³⁴ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

³⁵ WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

³⁶ SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+.+20231020+Economic+Strategy+and+Impact+Assessment.PDF

³⁷ WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

Importantly, as stated in the planning report³⁸ the Master Plan is considered consistent with the intention of Planning Priority W5. The stated adequacy relies on future development application opportunities providing key affordable housing development to support the population with further information provided in Housing Strategy Statement Report³⁹.

Shelter asserts “key affordable housing development” is not necessarily a technical reference to affordable housing as defined by the EP&A Act 1979, as amended (the Act) for very low to moderate income households, being such households as prescribed by the regulations or as provided for in an environmental planning instrument. It follows then, that a clear and unambiguous explicit reference to affordable housing as defined by the Act is required to distinguish it from commonly held notions of ‘housing affordability’. This distinction is imperative to rule out any degree of uncertainty prior to establishing Master Plan response adequacy. Consistency with the Planning Priority W5 remains unresolved without such necessary clarification.

Shelter also notes the Executive Summary to the Housing Strategy – Summary Statement refers to diverse and affordable housing in proximity of employment and transport,⁴⁰ but again fails to provide a clear and unambiguous reference to affordable housing as defined by the Act. As stated above, without an explicit reference to affordable housing defined by the Act the reference in the Housing Strategy remains ambiguous. Further, while a reference to social and affordable housing appears in the text of the Housing Strategy related to tenure of the 10, 000 apartments there is no assessment.

Moreover, the projected future community provided by the WPCA Master Plan Social Infrastructure Strategy in support of the Bradfield Master Plan anticipates the Bradfield City Centre to be characterised by students, young workers, single person households, Aboriginal and Torres Strait Islander people and Culturally and linguistically diverse groups⁴¹

While recommendations are tabled for aged care and health facilities, as well as facilities and services that facilitate social interaction and community connections (community centres cultural facilities and sport and recreation facilities) to increase social cohesion and build social resilience within the community,⁴² the GHD report⁴³ makes no recommendation for social infrastructure as social and affordable housing to be delivered through the Bradfield City Centre Master Plan. Importantly, this is despite prospective demand generated by both the Bradfield City Centre Master Plan site itself as well as the wider Aerotropolis and Western Parkland City as the Bradfield City grows⁴⁴.

³⁸ *ibid*

³⁹ *ibid*

⁴⁰ Macroplan (October 2023). Bradfield City Centre Master Plan Application Housing Strategy – Summary Statement. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/29.+Appendix+BB+-+20231020+Housing+Strategy+Statement+Report.PDF

⁴¹ GHD (October 2023). Bradfield City Centre Master Plan Application WPCA Master Plan Social Infrastructure Strategy. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/15.+Appendix+N+-+20231020+Social+Infrastructure+Strategy+Report.PDF

⁴² *ibid*

⁴³ *ibid*

⁴⁴ *ibid*

Shelter notes the significant contribution over the next 40 years to 2056 from:

- a completely new city centre (114 ha in size) earmarked for establishment in the early stages to enable connections with surrounding strategic centres within the Aerotropolis precinct⁴⁵
- approximately 64% of the wider Aerotropolis precinct population⁴⁶ which includes 50% of the Aerotropolis Core employment target⁴⁷.
- significant growth forecast, using a 15 year moving target for capacity, associated with the zoned capacity up to 54,000 apartments in the eight Western Parkland City LGAs outside of the Western Sydney Area Aerotropolis⁴⁸ (**Figure 2**).

The drivers influencing growth cannot possibly be expected to comprehensively inform the adequacy of the Bradfield City Centre Master Plan responses without any regulatory framework with power to have an effective impact on social and affordable housing provision factored in.

Further, Shelter notes the findings of performance of affordable housing clauses and planning agreements of the eight (8) LGAs outside of the Western Sydney Area Aerotropolis (**Table 1 of Appendix A**) including Blue Mountains, Camden, Campbelltown, Hawkesbury, Liverpool, Penrith and Wollondilly and Fairfield (**Figure 2**) will directly impact their ability to absorb social and affordable housing need associated with the Bradfield City Centre Master Plan in an effort to address the inconsistency within the exhibited Master Plan.

The findings in tracking performance of planning mechanisms and procedure and other sources of the eight councils (**Table 1 of Appendix A**) reveals considerable variability in the type, degree and weight of instruments and procedures given to enhance capacity for affordable housing growth used by each council. Consequently, the potential for local councils to play an effective role in fostering social and affordable housing in the Bradfield City Centre of the Aerotropolis is lacking.

Shelter asserts comprehensive regulatory arrangements to effectively support growth and deal with those lower income households who will be disproportionately impacted by housing affordability issues, including essential workers, needs to be addressed through the exhibited Master Plan.

⁴⁵ WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

⁴⁶ SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+--+20231020+Economic+Strategy+and+Impact+Assessment.PDF

⁴⁷ SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+--+20231020+Economic+Strategy+and+Impact+Assessment.PDF

⁴⁸ Macroplan (October 2023). Bradfield City Centre Master Plan Application Housing Strategy – Summary Statement. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/29.+Appendix+BB+--+20231020+Housing+Strategy+Statement+Report.PDF

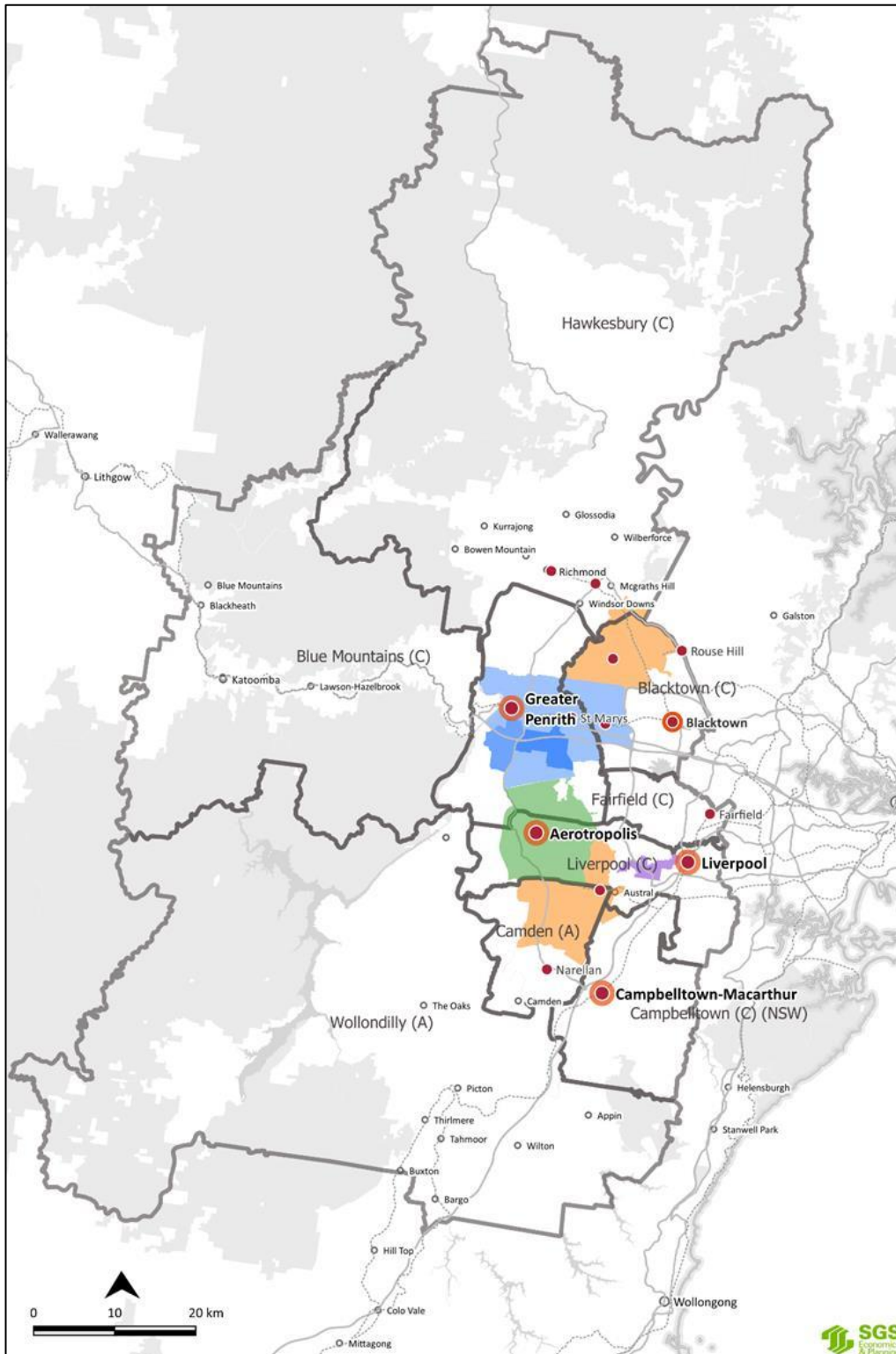


Figure 2: Strategic context of the Bradfield City Centre, Bradfield within the Western Sydney Aerotropolis (Liverpool LGA) highlighting the 8 LGAs

Source: SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF

Western Sydney Aerotropolis Plan (WSAP)

Shelter notes the EP&A Regulation requires a statement of consistency with the WSAP as it provides the overarching strategic direction for the development of land in the Aerotropolis, aligning it to the Greater Cities Commission Plan: A Metropolis of Three Cities and the Western City District Plan (WCDP). The purpose and alignment of the WSAP has been considered because it informs the development of a precinct plan and Bradfield City Centre Master Plan in the Aerotropolis.

An overview of the key principles / guiding directions as reported in Table 8 of the exhibited Planning Report⁴⁹ finds the Master Plan is overall consistent with the key considerations and strategic outcomes for the vision and social and cultural infrastructure of the Aerotropolis Core Precinct.

However, in the absence of any assessment of social and affordable housing need and or provision in any of the exhibited Planning Report and or technical reports in the accompanying documentation⁵⁰ for the Bradfield City Centre Master Plan Shelter questions how the Master Plan can satisfactorily address the key principles and guiding directions for the WSAP.

Further, Shelter points to a factual error in the Housing Strategy Statement Summary report which states the Bradfield City Centre has the capacity to deliver 10,000 apartments making it a significant contribution to the total supply and diversifying housing supply within the Aerotropolis consistent with Objective (d) of the WSAP.

Objective (d) of the WSAP does not exist. Objective (d) relates to the EP&A Act 1979 requirement for affordable housing.

Importantly, affordable housing as defined by the Act concerns itself with income band eligibility to support very low (50% of the median wage), low (between 50% - 80% of the median wage) and moderate (80% 120% of the median wage) income (tenanted) households. In effect, this is housing targeted to support the lowest 40% of income earners, including essential workers forecast to come from the west and other parts of Sydney⁵¹ who will provide a major source of employment for the Aerotropolis⁵².

Environmental Planning and Assessment Act

Shelter notes Table 9 of the Planning Report⁵³ sets out the statutory planning framework for NSW. This includes social considerations as part of the decision making processes for assessment by the consent authority. Section 1.3 Objective (d) of the Act is specific to

⁴⁹ WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

⁵⁰ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

⁵¹ WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

⁵² ibid

⁵³ WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

promote the delivery and maintenance of affordable housing. The Master Plan response reads Bradfield City Centre will provide affordable housing options to facilitate the ‘work near home’ opportunity for all.

Shelter notes authority exists for the Master Plan to implement affordable housing in any of the exhibited documentation for the Bradfield City Centre Master Plan⁵⁴. And specifically, that the consent authority must have regard to other applicable environmental instruments that apply to the proposed development.

The use of a generic name convention “NSW Policy”⁵⁵ to which affordable housing will be assessed does not in itself compel the consent authority (DPHI) to enable equitable housing outcomes. Rather, the lack of details over expectations for affordable housing provision to inform development of the Bradfield City Centre Master Plan lacks transparency. Critically, it will have far reaching effects for not only the inclusion of affordable housing within the Bradfield City Centre but more broadly, for other functional planning mechanisms and procedures including local planning schemes in the surrounding 8 LGAs to the Western Sydney Aerotropolis which is clearly inadequate in the public interest.

Other relevant SEPPs: SEPP (Housing) 2021

Shelter can find no listing for the SEPP (Housing) 2021 in either Table 12 of the Planning Report and or any supporting documentation⁵⁶. Notwithstanding, Shelter is aware the consent authority must have regard to other application environmental planning instruments that apply to the proposed development. Shelter notes social and affordable housing is clearly insufficient without a supporting SEPP.

Further, the SEPP (Housing) 2021 sets out both a reportable definition of affordable housing defined by the Act and state wide standards to produce equity accountability and transparency over implementation of social and affordable housing outcomes for the Bradfield City Centre Master Plan and more broadly, Aerotropolis.

Western Parkland City SEPP

The Western Parkland City SEPP which aligns with the aims of the WSAP and Aerotropolis SEPP sets out the zoning for the Bradfield City Centre Master Plan. While Shelter understands affordable housing will be permissible within the Bradfield City Centre from the planning report⁵⁷ there is no explicit definition for affordable housing defined by the EP&A Act 1979 or reference in either the aims and or design and intent, listed as a permissible use in the zoning table and or has no key development standards to guide affordable housing development considerations a consent authority has to have to regard to.

⁵⁴ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

⁵⁵ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

⁵⁶ NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

⁵⁷ *ibid*

3. Public Interest

The Planning Report concludes the Master Plan is within the public interest. In recognition of the absence, insufficient and or inadequate Master Plan responses for social and affordable housing outcomes, this is a fundamentally flawed view which cannot be reconciled by the as exhibited Master Plan and accompanying supporting technical reports.

Social and affordable housing is in the public interest. Social and affordable housing creates a socially diverse residential population representative of all income groups, when created through well considered government intervention, and, is held in perpetuity. Such a critical action embeds a sustainable future for all within communities. It is therefore incumbent that minimum standards (a negotiated planning agreement) to acquire affordable housing as a public benefit is part of the Bradfield City Centre Master Plan through the development approval process before the DPHI for consideration to shift the inequity.

Affordable housing is recognised as a material public benefit by up to 60% of all councils across Greater Sydney (**Table 1 in Appendix A**). The lack of an advertised functional scheme (AHCS) to secure developer contributions for affordable housing through the development process, while ideal, does not prevent the NSW Government from making use of a negotiated planning agreement for affordable housing as an additional public benefit. It is a viable solution to the current administrative and procedural barrier to incentivise supply of affordable housing held in perpetuity within the Bradfield City Centre.

Shelter asserts any negotiated planning agreement needs to reflect a percentage that acknowledges the 114ha Bradfield City Centre site is commonwealth government land. Shelter notes the NSW Government has already committed to delivering 30% social and affordable housing on its own land, where it is being developed for residential housing.

Stronger government intervention to provide affordable housing is a high priority in the Bradfield City Centre. The DPHI has the ability to leverage for housing affordability not only based on the share of forecast growth, total housing capacity, major development and government owned greenfield opportunity but one which comprehensively encompasses the whole housing spectrum, particularly those lower income (households unaccounted for in the exhibited Master Plan application as made. Such an effective response to social and affordable housing is achievable where political circumstances permit.

Further, without negotiating for implementation of affordable housing held in perpetuity through a negotiated planning agreement, time limited consents cannot resolve the eventual loss of affordable housing for those most in need as properties return to the private rental market.

Time limited consents for affordable housing cannot have an effective or enduring impact to help those most in need beyond a limited timeframe without the consent authority (in this case DPHI) leveraging for effective implementation of affordable housing held in perpetuity.

Otherwise, the net result is a return of those dwellings and their lower income tenants to the private rental market. Housing affordability issues will continue as a critical and intractable problem for those lower income (rental) households (those most in need) without this safety net.

4. Conclusion

While the exhibited Master Plan considers affordability needs of buyers, renters and owners who make up the housing market for the future Bradfield City Centre it fails, completely, to consider those for whom the private housing market consistently fails: those requiring diverse and secure affordable housing (held in perpetuity) that is well located near employment opportunities and transport⁵⁸.

Shelter is calling for housing outcomes that are genuinely offered to a mix of income levels, household types and cultural groupings with far reaching equitable outcomes that can be shared by generations to come within the new Bradfield community of the Western Sydney Aerotropolis.

The public interest requires a comprehensive picture of housing affordability which delivers certain social and affordable outcomes for lower income households, not just a picture based on housing capacity, as proposed. Essential to this is a functional planning framework for the as exhibited Bradfield City Centre Master Plan which provides for adequate social housing and appropriate levels of affordable housing (held in perpetuity) within the Bradfield City Centre, as both will have an enduring public benefit within the local community of the Aerotropolis for generations to come.

Shelter advocates for a recommendation for refusal of the exhibited Master Plan in direct response to the lack of evidence to make explicit provisions to provide for, maintain and regulate matters relating to social and affordable housing in the, as exhibited, Draft Bradfield City Centre Master Plan.

⁵⁸ WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: https://shared-digital-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF

Please contact me at pilar@shelternsw.org.au if you require any further clarification / would like to discuss any of the details within the above submission.

Thank you

Sincerely

Pilar Aberasturi

Planning Policy Officer
Shelter NSW

Pilar Aberasturi

Sincerely

John Engeler

CEO,
Shelter NSW

John Engeler

Appendix A

Table 1: Local Government affordable housing delivery

LGA – Greater Metro Sydney	Instrument Clauses / definition of AH	AHCS / Plan	Planning Agreement Register that includes VPA with an AH contribution	AH dwellings
Blue Mountains Council	<p>Blue Mountains LEP 2015 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0829</p> <p>BM LEP 2015: Cl.6.22 – Incentives for providing AH – add 15% of the max GFA with 50% of incentive used for AH for at least 3 years on title.</p> <p>Blue Mountains LEP 2005 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2005-0633</p> <p>BM LEP 2005 Cl 12 – Principal Objectives of the Plan – to promote affordable housing options</p> <p>Blue Mountains LEP 1991 https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0683</p>	<p>Local Housing Strategy 2020 https://www.bmcc.nsw.gov.au/sites/default/files/docs/Blue%20Mountains%20Local%20Housing%20Strategy_March%202020.pdf</p> <p>No adopted Affordable Housing Strategy</p>	<p>No AH in VPAs https://www.bmcc.nsw.gov.au/development/planning-rules/infrastructure-contributions-planning-agreements</p> <p>Note</p>	No

Camden Council	Camden LEP 2010 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0514	Local Housing Strategy October 2020	No AH in VPAs https://www.camden.nsw.gov.au/strategic-planning/section-7-11/voluntary-planning-register/	No.
Campbelltown Council	Campbelltown LEP 2015 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0754 Cl.8.4 AH in area B – (8.4 (1)& 8.4 (2) at least 5% of GFA used for res accommodation as AH (gross floor area of 50sqm).	Local Housing Strategy Endorsed by Campbelltown City Council 29 September 2020	https://www.campbelltown.nsw.gov.au/Build-and-Develop/Planning-Policies-and-Controls/Planning-Agreement-Register	Yes AH Units
Fairfield City Council	Fairfield LEP 2013 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0213	Fairfield City Local Housing Strategy 2020	Fairfield Planning Agreement https://www.fairfieldcity.nsw.gov.au/Planning-and-Building/Planning-and-Policies/Planning-Agreements However, the register of planning agreements on exhibition, executed and or concluded do not show any planning agreements where AH has been acquired.	Yes.
Hawkesbury	Hawkesbury LEP 2012 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2012-0470 1.2 Aims of Plan	Hawkesbury Local Housing Strategy August 2020	https://www.hawkesbury.nsw.gov.au/plan-and-build/planning-policies/planning-agreements	No AH

Liverpool Council	<p>Liverpool LEP 2008 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2008-0403</p> <p>Liverpool Plains LEP 2011 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2011-0644</p>	Liverpool Local Housing Strategy July 2021	https://www.liverpool.nsw.gov.au/development/liverpools-planning-controls/planning-agreements	No AH
Penrith Council	<p>Penrith LEP 1991 (Environmental Heritage Conservation (1991 EPI 674) https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0674</p> <p>Penrith LEP 1998 (Urban Land) (1991 EPI 9) https://legislation.nsw.gov.au/view/html/inforce/current/epi-1999-0009 Cl. 9. Zone objectives and dev control table</p>	Local Housing Strategy 2022	https://www.penrithcity.nsw.gov.au/building-development/planning-zoning/planning-controls/voluntary-planning-agreements	Yes AH.
Penrith Council	<p>Penrith LEP 2010 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0540 Zone R4 High Density Residential</p> <p>Penrith LEP No. 201 (Rural Lands) (1991 EPI 364)</p>	Local Housing Strategy 2022		No AH

	https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0364 Cl. 7.31 AH contributions Penrith LEP No. 255 – Exempt and Complying Development (2000 EPI 122) https://legislation.nsw.gov.au/view/html/inforce/current/epi-2000-0122			
Wollondilly Shire Council		Local Housing Strategy 2021	https://www.wollondilly.nsw.gov.au/planning-and-development/development-contributions/planning-agreements-register/	No.

4 March 2024

ATTENTION: Catherine Van Laeren

Executive Director – Metro West
NSW Department of Planning, Housing and Infrastructure
via: NSW Department of Planning Portal

cc. Anne Skewes
Acting CEO
Western Parkland City Authority
via email: Anne.Skewes@wpcasidney.com.au

RE: BRADFIELD CITY CENTRE MASTERPLAN

Dear Mrs Van Laeren,

The Urban Development Institute of Australia NSW (UDIA) is the state's leading development industry body. We represent the leading participants in the industry and have more than 450 members across the entire spectrum of the industry including developers, financiers, builders, suppliers, architects, contractors, engineers, consultants, academics and state and local government bodies.

UDIA invests in evidence-based research that informs our advocacy to state, federal and local government, so that development policies and critical investment are directed to where they are needed the most. Together with our members, we shape the places where people will live for generations to come and in doing so, we are city shapers. In NSW alone, the property industry creates more than \$581.4 billion in flow on activity, generates around 387,000 jobs and provides around \$61.7 billion in wages and salaries to workers and their families.

UDIA welcome the opportunity to provide feedback to both the Department of Planning and Western Parkland City Authority regarding the draft Bradfield City Masterplan. The draft Bradfield City Centre Master Plan sets out a framework for future development within the city centre of the Western Sydney Aerotropolis as well as further information on the future mixed-use development, road networks, open space and parkland within the city centre.

UDIA understands as part of the master planning process, changes to current planning controls are also required, including the State Environmental Planning Policy (Precincts – Western Parkland City) 2021, Western Sydney Aerotropolis Precinct Plan, and the Western Sydney Aerotropolis Development Control Plan (DCP) – Phase 2.

Since 2014 industry has witnessed significant planning and rezoning announcements, with the Nancy Bird Walton International Airport developing on schedule. However, development in the other 9 precincts across the Aerotropolis is progressing slowly, largely due to uncertainty around the delivery of critical enabling infrastructure. Swathes of rezoned industrial land is still sitting vacant waiting for clarity on when the complex web of new or upgraded roads will be delivered and when the recycled stormwater scheme connecting industrial lands will be completed.

UDIA and our members have identified some areas of concern regarding the current master planning proposal and associated plans, and we stand ready to assist both the Department of Planning, Housing and Infrastructure (DPHI, or the Department) and the Western Parkland City Authority (WPCA, or the Authority) to achieve the vision for the Bradfield City and associated precinct. To better improve on the proposed masterplan for Bradfield, both the Department and Authority should consider the following recommendations:

Recommendations:

- 1. UDIA strongly urges the WPCA to make public their existing Memorandum of Understandings with investors who have made undertaking or committed to the Bradfield City, in order to further generate industry certainty and clarity within the Aerotropolis and across the Western Parkland City.**
- 2. UDIA strongly encourages the DPHI and WPCA to increase the maximum permissible heights and FSR ratios within the Precinct.**
- 3. UDIA strongly encourages the WPCA to clarify if any external research has been undertaken to adequately capture the jobs and skills needs of the growing Western Parkland City population and the ability for the Bradfield City to scale its development potential, in order to better capture the needs of a growing population.**
- 4. That the WPCA make adequate provision for the build and completion of the Southwest Rail Link Extension by 2031 and the full North-South Rail link by 2035.**
- 5. UDIA recommends the Masterplan provide greater clarity regarding the next stage of the process - the delivery and construction phase.**

- 6. UDIA recommends the WPCA provide a clearer scope of the development sequencing and timing within the Bradfield City Centre**
- 7. UDIA strongly encourages the WPCA, due it being the first master planned community leading the Aerotropolis' development, to focus funds toward local road and transport infrastructure.**
- 8. UDIA urges the WPCA to carefully consider the thresholds, locations and identified structures requiring design competitions and that all reasonable steps are taken to mitigate extensive and costly design processes.**

NextGen West Manifesto:

The UDIA's NextGen West platform is the summary of two years of work from UDIA's NextGen West Leadership Panel – represented by leaders from Local Government, State Government Agencies and the development industry. NextGen West represents the voice for GWS to ensure the region, cities and neighbourhoods emerge as desirable places to live and work. Implementation of our pillar recommendations, with the right investment and the right decisions that achieve better productivity and liveability outcomes, will ensure that Bradfield will emerge as a globally recognised growth area.

NextGen West identifies the six critical areas necessary to ensure that Aerotropolis and Western Parkland City contributes to Sydney's growth and global competitiveness. NextGen West is a strategy designed to improve regional access and ensure that informed decision-making by government leads to infrastructure coordination and a significant increase in amenity. UDIA recommends both the Department of Planning and the Western Parkland City Authority incorporate best practice thinking outlined in the six pillars of NextGen West when considering the masterplan. These pillars include:

- Developing essential Infrastructure that covers both city shaping and critical enabling infrastructure aimed at servicing future growth and better connections between commercial centres across the western suburbs.
- Placing downward pressure on housing affordability by ensuring the right balance of density and diversity across local government areas.
- Continue incorporating jobs and employment initiatives that create higher skilled jobs closer to home in Western Sydney.
- Simplify governance and planning pathways that assist the development industry in navigating planning decisions.
- Ensure environment and resilience measures are prioritised for communities to better withstand environmental challenges and which include biodiversity outcomes that are realistic, affordable, and achievable.

- Continue investment in social and cultural infrastructure to improve urban environments and public domain areas together with funding for arts and culture that will build upon the rich diversity in Western Sydney.

Executive Summary:

The WPCA Bradfield Masterplan should be applauded for its robust and well-considered Precinct, open space, community amenities and ambitious infrastructure. UDIA and its members note some key improvements could be made to better deliver for the future community of Bradfield and to provide greater certainty for industry in setting out the vision for the Bradfield City. UDIA members have raised concern regarding a lack of detail with some of the contents contained in the Masterplan and associated documentation, with several members indicating that certain parts are rehashed from previously distributed Department of Planning Aerotropolis Planning Package information. Similar Masterplans, currently under review by the Technical Assurance Panel (TAP) in the Aerotropolis by comparison have included 47 detailed technical reports and 257 detailed civil drawings (cross sections and elevations), detailing delivery and requirements compliance plans for areas in similar size to the Bradfield City (180 hectares and over 1 million square metres of warehouse, factory, hardstand and commercial offices). Members have also indicated that they need to better understand how the WPCA will sequence the delivery of infrastructure and transport connectivity with other areas across the Aerotropolis and Western Parkland City.

UDIA and its members are supportive of the successful development of Bradfield over the coming decades and industry have expressed an interest to better support and participate with investors to deliver the vision for Bradfield. Members are seeking greater clarity and understanding about the potential opportunities for private sector participation in the delivery of Bradfield. UDIA is also seeking a greater understanding pre commitments and undertaking made by existing Memorandums of Understanding from local and international investors in the Precinct. The UDIA notes that the Masterplan has not made any indication of these MOU's.

UDIA also supports the Masterplan stressing the need for more apartment capacity in the planning framework to cope with rising demand, as future public transport options open to the public over the next decade in and around the Western Parkland City and Aerotropolis.

Recommendation:

- **UDIA strongly urges the WPCA to make public their existing Memorandum of Understandings with investors who have made undertaking or committed to**

the Bradfield City, in order to further generate industry certainty and clarity within the Aerotropolis and across the Western Parkland City.

Realising the full potential of Bradfield:

The UDIA has taken time to consider if the Masterplan has adequately set ambitious targets for employment, housing, commercial and jobs growth. Whilst we understand that it has been prepared within the remit of the broader Aerotropolis planning framework, we consider the delivery of 20,000 - 24,000 jobs as being under ambitious for the City of Bradfield. For example, Parramatta has by contrast developed nearly 55,000 jobs to date and is still growing. The Western Parkland City Authority has outlined that it expects 8000 jobs and 3000 residents to be delivered by 2036, with total development within the precinct supplying circa 341,000 sqm of Gross Floor Area (GFA). By 2056, this figure is expected to increase to circa 24,000 jobs and 15,000 residents, with GFA totalling 1.25 million sqm under a maximum permissible building height limit of 62 metres. Table 17 of the Masterplan report indicates that from 2026, Bradfield will support between 1,000 and 1,200 jobs, with a site coverage of existing dwellings delivering circa 48,500 square metres of floor area. Unless these are construction jobs, this figure is impossible to achieve in the short timeframe outlined in the Masterplan, with jobs and resident figures rising considerably by 2036 to 8,300 jobs and 3,100 residents respectively. UDIA strongly encourages the Department of Planning and WPCA to increase the maximum permissible heights and FSR ratios within the Precinct, allowing for greater employment, residential and investment capacity within the City of Bradfield to meet the precincts potential over the coming decades of development. Bradfield is effectively capping its ability to develop jobs forever by requirements in the planning framework to not exceed proposed floorspace and height caps. In the UDIA's view Bradfield City has greater potential than what is reflected in the Masterplan, and this will inadvertently limit the scope and framework of the city for decades to come. Increasing heights and FSRs to support future residential and employment developments within the precinct will assist in delivering job generating assets which boost productivity, housing and community opportunity via access to skilled jobs and opportunities within close proximity to homes.

UDIA strongly encourages the WPCA to clarify if any external research has been undertaken to adequately capture the jobs and skills needs of the growing Western Parkland City population and the ability for the Bradfield City to scale its development potential, in order to better capture the needs of a growing population. Due to the timeline for development extending beyond 2056, UDIA and its members are concerned that the current master planning process may be exposed to external market, construction, economic and government factors, which may hinder its ability to deliver on the overall vision for the precinct. This is an incredibly long horizon given the intensity

of the \$1 billion in funding that was dedicated to developing the Bradfield CBD as a catalyst for surrounding growth in the Aerotropolis.

Recommendations:

- **UDIA strongly encourages the Department of Planning and WPCA to increase the maximum permissible heights and FSR ratios within the Precinct.**
- **UDIA strongly encourages the WPCA to clarify if any external research has been undertaken to adequately capture the jobs and skills needs of the growing Western Parkland City population and the ability for the Bradfield City to scale its development potential, in order to better capture the needs of a growing population.**
- **UDIA and its members strongly urge the WPCA and Planning to consider increasing floorspace and height caps.**

Transport Connectivity in Bradfield and the Aerotropolis:

The Western Parkland City and Bradfield centre more specifically is set to emerge as the third major city in Greater Sydney, with up to 184,500 new homes and 200,000 new jobs by 2036. Inadequate public transport is evident across the West, with on average 1 rail station per 30,000 people in Western Sydney, compared to 1 every 15,000 people in the Eastern suburbs. UDIA notes that the Bradfield Masterplan has detailed that there has been no decision as to whether the Bradfield Metro rail will be built with a tunnel or viaduct, as it traverses Thompson Creek.

The scale of public transport infrastructure needed to service Western Sydney is significant and will therefore take time to deliver. The obvious gaps in the current network in the Southwest growth precincts is the Leppington connection to the Aerotropolis and the North-South Metro line termination at Bradfield. While there are plans to join Leppington to Bradfield by rail, and to extend the Metro line from Bradfield to Macarthur via Oran Park and Narellan, there has been little commitment to timing or budget by the Government since its announcement in 2018.

The UDIA believes that the WPCA should support the southern extension of the Metro line from Bradfield to Leppington and to Oran Park, as part of its Master planning, in order to better serve the substantial population growth being realised in this part of Western Sydney. Extensive residential and employment areas will be opened east and west of the Northern Road in the next decade, adding to existing residential and employment populations. While there is a commitment to investigate extending the Metro rail network from Bradfield to Leppington, there is no such commitment for any southern extension of

the route to Oran Park and beyond. The scale of public transport infrastructure needed to service Western Sydney is significant and will therefore take time to deliver. However, integrated land use planning along already protected rail corridors should commence immediately, so that landowners and developers have the certainty required to plan for long lead time projects, but more importantly so that community benefits from the eventual delivery of the infrastructure can be maximised. Strategic planning for both the major rail projects in Southwest Sydney should commence immediately, with a strong focus on driving housing supply to address the existing and future housing shortages, and to ensure that a network of rail-based centres can be delivered over time to meet the needs of growing communities across the Aerotropolis and Western Parkland City.

Recommendation:

- **That the Western Parkland City Authority make adequate provision for the build and completion of the Southwest Rail Link Extension by 2031 and the full North-South Rail link by 2035.**

Bradfield Masterplan Infrastructure Delivery:

Since the Federal Government's announcement of the Western Sydney Airport in 2014, the Government's vision of the land surrounding the airport has been detailed in several plans, policies, and environmental planning instruments (EPis). UDIA members have raised concerns regarding the documentation on infrastructure delivery contained within the Masterplan package. Many members have outlined that the current document is vague, reflecting the evolving nature of the contribution's framework (draft s7.11 plan at Liverpool City Council, transition from SIC to HPC in 2026, and exemptions from the 2% train station precinct surcharge on the SIC). Adjoining landowners are calling for greater confidence to source partnership opportunities within Bradfield and UDIA therefore calls on the WPCA to demonstrate greater leadership within government to align their masterplan with the evolving and changing landscape of infrastructure delivery. UDIA recommends the Western Parkland City Authority provide a clearer scope of the development sequencing and timing within the Bradfield City Centre, as this will assist neighboring developers and landowner within the Aerotropolis and surrounding Western Sydney growth precincts. The staging discussion in the exhibited material by the WPCA is very broad and industry believes that more work can be done to further enhance the plan ahead of its finalization.

Recommendations:

- **UDIA recommends the Masterplan provide greater clarity regarding the next stage of the process - the delivery and construction phase.**
- **UDIA recommends the Western Parkland City Authority provide a clearer scope of the development sequencing and timing within the Bradfield City Centre.**

Contributions, Fees and Charges:

The WPCA have detailed that they wish to apply the Housing and Productivity Contribution fees toward open space and tree canopy coverage. Industry feels this is a wasted opportunity which would be better focussed on the upgrade of vital road infrastructure such as Badgerys Creek Road, which in turn will further accelerate investment in Bradfield with immediate effect.

One of the WPCA's top priorities listed in Table 19, is the Metrolink Boulevard. UDIA believes that greater attention could turn to other infrastructure within the Bradfield Precinct, as neighbouring developments benefiting from the Metrolink not slated to occur for several years and the Eastern Ring Road (ERR) is several years away from being constructed according to Transport for New South Wales (TfNSW). UDIA strongly encourages the WPCA, due it being the first master planned community leading the Aerotropolis' development, to focus funds on local road and transport infrastructure.

As part of the masterplan process and documentation, the WPCA have also outlined that the NSW Government and council is owed a total of \$26 million, as part of fees incurred via SIC and Local Council Contributions (s7.12). UDIA notes that the figures contained in the Masterplan for s7.12 contribution fees have not been calculated since Liverpool City Council's 4.5% development cost proposal was still a draft figure at the time of preparing the report. The WPCA have also failed to calculate their Housing and Productivity Contribution, since it does not currently apply (SIC converts to HPC on 1 July 2026), even though it will in the future. UDIA feels the WPCA and broader industry would benefit from greater transparency and up to date reporting as part of the Masterplan and therefore encourages the WPCA to update figures in line with recent government announcements and changes to existing fee arrangements with council.

Recommendations:

- **UDIA strongly encourages the WPCA, due it being the first master planned community leading the Aerotropolis' development, to focus funds toward local road and transport infrastructure.**

Design Excellence Requirements:

The Masterplan report includes design excellence requirements for several development sites within the City of Bradfield. UDIA urges the WPCA and Department of Planning to consider whether the proposed requirements could result in overlapping design competitions or competing requirements and encourages careful consideration as to the thresholds and locations currently included in the design excellence strategy. Any review panels should be principle based to mitigate extensive and costly design processes which may have the outcome of delaying development. Whilst these controls can be well meaning and designed to mitigate poor design outcomes, they have little regard to development feasibility and can sometimes stifle development adding time and cost. Often design excellence panels have very conflicting opinions based on personal preferences rather than agreed standards. This can mean money and time are wasted on consultants needing to redesign plans, as well as the cost of the panels themselves. UDIA urges the WPCA to carefully consider the thresholds, locations and identified structures requiring design competitions and that all reasonable steps are taken to mitigate extensive and costly design processes.

Recommendation:

- **UDIA urges the WPCA to carefully consider the thresholds, locations and identified structures requiring design competitions and that all reasonable steps are taken to mitigate extensive and costly design processes.**

Conclusion

UDIA members want the City of Bradfield's vision to fully develop over the coming years. The broader Aerotropolis and Western Sydney region would benefit from greater cooperation and partnership between Government and the private sector. Coordinating the delivery of priority road, water and public transport infrastructure in order to unlock much needed development, including areas surrounding Bradfield are necessary. A combination of current supply shortages, expensive operating conditions, slow progress in delivering serviced land, and complex governance arrangements has led to low investment confidence. Fortunately, the Aerotropolis is made of large landholdings and a motivated private sector that can offer expertise and experience to implement the vision and present opportunities for partnerships. With major planning policies for the Aerotropolis now completed, industry is keen to shift the focus to the delivery phase.

The WPCA should be applauded for their robust and well-considered Precinct masterplan, associated infrastructure and other plans. The recommendations outlined in our submission, will assist in developing the City of Bradfield.

Please reach out to **Director – Greater Western Sydney, Charles Kekovich** at ckekovich@udiansw.com.au or call via 0409 776 588 if you would like to discuss these matters further.

Kind regards,

A handwritten signature in black ink, appearing to read 'G. Melvin', with a long, sweeping underline stroke.

Gavin Melvin
Acting Chief Executive Officer
UDIA NSW

4 March 2024

The Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

cc. Anne Skewes, CEO, WPCA – sent by email

Electronic submission

Re: Bradfield City Master Plan

To whom it may concern

After a considerable amount of time and resources that have gone into the preparation of the draft Bradfield City Master Plan, it is somewhat disappointing that the plan is limited to the Government owned boundaries of the City of Bradfield.

The detail within the Master Plan for the city of Bradfield is solid, but with only two to three years to go before the Nancy Bird Walton Airport begins operations, there is a massive funding deficit for the infrastructure listed in the Infrastructure Delivery Strategy and this is even more the case for the privately owned land surrounding Bradfield.

The WPCA Bradfield Master Plan is not seeking to change much of the detail already provided in the Aerotropolis Precinct Plans, the interfaces with neighbouring properties and its role as a catalyst for development in Western Sydney.

The detail of the planning controls is welcome, as is the designation of much of the land as mixed-use development. The Height of Buildings (HOB) and Floor Space Ratio (FSR) limits are conservative and threaten to limit Bradfield as a third city. While Urban Taskforce appreciates that the CASA limits must be respected, beyond that, WPCA should prepare its Master Plan with ranges up to the CASA permitted HOBs.

Bradfield City is to be the centre of the third city of Sydney. It should not be constrained by conservative thinking in these formative years. Think of Bradfield – who set up the growth of Sydney with a massively over-scoped (for the time) Harbour Bridge.

The focus on Bradfield City, in isolation, and not the infrastructure servicing the land owned by the private sector surrounding the Bradfield City where the owners are ready and willing to spend billions of dollars to generate jobs and new homes, is disappointing.

Urban Taskforce is particularly concerned about the lack of detail regarding how Bradfield will be connected to the broader precinct in the short term. What is the role of the WPCA as the coordinator of infrastructure in the Aerotropolis and the rest of the Western Parkland City?

1. Rename Western Parkland City Authority the Bradfield City Development Authority

Urban Taskforce welcomes the NSW Government's announcement last year that the Greater Cities Commission and the Western Parkland City Authority would be folded back into the Department of Planning, Housing and Infrastructure (DPHI). This will enable a single point of focus for planning (DPHI) and a clear delineation of responsibility for infrastructure sequencing and delivery across both the WPCA and also within the Bradfield City precinct.

With the establishment of DPHI on January 1, there is an opportunity for a reappraisal of the strategic direction of the Western Parkland City.

However, as of the start of March 2024, there remains considerable confusion among landowners, industry, the media and the community, as to the role of the WPCA. The website outlines broad responsibilities:

Our work

					
Delivery of the 114-hectare Bradfield City Centre	Upskilling residents of the Western Parkland City through our New Education and Training Model (NETM) courses	Growing industry capability through development of the Advanced Manufacturing Research Facility (AMRF)	Coordinating infrastructure development across the Western Parkland City	Attracting investment into the Western Parkland City	Supporting liveability projects to improve the lives of residents

Through the release of this Draft Master Plan, it is becoming increasingly clear that the focus of the WPCA is on the development of Bradfield City.

This focussed role has not been clearly articulated to major stakeholders. It is certainly not understood.

The Master Plan's Infrastructure Strategy is largely a repeat of what was exhibited by the then Department of Planning and Environment in the Precinct Plans and focusses solely within the Bradfield boundaries.

As a case study, the Master Plan's commentary on electrical power is that the supply will be delivered from the Bradfield North Zone Substation. This is as a result of other landowners working directly with Endeavour Energy to secure this vital infrastructure. The Master Plan rests on the efforts of third parties in this respect.

As a result, there is little consideration evident of enabling infrastructure or coordination outside of what some in the industry are now characterising the WPCA's work as the "Isle of Bradfield."

From this one case study, it is clear the WPCA is focussed solely on Bradfield and not coordinating delivery and growth with their Aerotropolis neighbours.

Given the wide perception, and one that remains on the Authority's website, that a key role of the WPCA is to coordinate infrastructure development across the Western Parkland City, industry and Urban Taskforce members could be forgiven for their expectation that this Master Plan would articulate how the infrastructure will connect in with the plans for the rest of the Western Parkland City.

Recommendation 1: that the roles and responsibilities of the Western Parkland City Authority are clearly communicated to all stakeholders, and that the Government consider renaming the Western Parkland City Authority the "Bradfield City Development Authority".

2. Planning Controls

Urban Taskforce supports the application of Mixed Use (MU1) zoning throughout Bradfield City Centre. This will provide flexibility into the future when determining the most appropriate mix of residential and commercial space.

The draft Master Plan, whilst noting the maximum permissible height based on CASA's Obstacle Limitation Surfaces (OLS) is RL 125.25 metres. Yet in its indicative Building Height Distribution, WPCA has established maximum building heights with a range from 17 metres to only 60 metres. Similarly, the maximum Floor Space Ratio in the Precinct Plan on 3.5:1.

These parameters are conservative and must be revised. There should not be such low prescriptive heights in the draft Master Plan. If Bradfield City is to be Sydney's third city, the CAS limits should be the only limitation

Recommendation 2: that WPCA review the Heights of Building and FSRs to ensure there is opportunity for greater height and density within the Bradfield City Centre.

FSR and HOB and anything else. Focus on flexibility. Welcome the extent of mixed use zoning, but use this to question the conservative and prescriptive HOB and FSR mandates.

3. Infrastructure Delivery Strategy

The Infrastructure Delivery Strategy (IDS) reflects a lack of focus on the delivery of enabling infrastructure. Urban Taskforce raises the following concerns for the Strategy:

The timeline for development extends beyond 2056, which is an incredibly long horizon given the intensity of the funding (\$1 billion) that was dedicated to developing the Bradfield CBD as a catalyst for surrounding growth.

The timeline, the delivery sequencing and estimated total costs for each element of the infrastructure plan should be articulated in conjunction with the infrastructure plan for the rest of the Western Parkland City, so industry can better understand how connectivity might work and where they may need to consider alternative infrastructure delivery and funding options in areas outside Bradfield City.

Recommendation 3: that DPHI/WPCA review critical elements of the Master Plan in terms of infrastructure delivery and timing and a separate 5-year document prepared by DPHI for the precinct and surrounding lands as a matter of urgency.

4. Section 7.12 contributions

Although WPCA have placed estimations that value their roads at \$72 million and the open space component at \$30 million, these values are not useful for industry without confirming what WPCA's estimated Section 7.12 contribution will be.

Is it going to be the same as that being applied to Liverpool City Council? Or is it going to be different? The answers to these questions are critical to private sector interest in joining the Government to develop parcels of land in the Bradfield precinct.

The strategy allocates \$26 million for SIC fees and the Local Contributions have not been calculated since LCC's 4.5 per cent of development cost proposal was still a draft figure at the time of preparing the report.

Liverpool City Council resolved to place the updated draft Contributions Plan on public exhibition in May 2023. Urban Taskforce asserts that it would be reasonable to assume 4.5% levy could be adopted for the purpose of calculating WPCA's liability for the purposes of calculating the Master Plan.

The Infrastructure Delivery Strategy is dated October 2023, coinciding with LCC's resolution to forward the IDS to the Department for assessment and Ministerial approval.

Recommendation 4: the Government confirm the Section 7.12 local infrastructure contributions applicable to Bradfield City. The levy should take into account the high burden of SICs proposed for Bradfield City.

5. NSW Government's Housing and Productivity Contribution

The Master Plan does detail the financial contributions to be made by landowners arising from the NSW Government's Housing Productivity Contribution, even though it will apply in the future (from 1 July 2026).

It is critical that DPHI clarify all the fees, taxes, charges, and levies that are to apply in the Bradfield City in this Master Plan. This will determine how much money will be paid by the private sector to the Government for each "super-lot" within Bradfield.

Understanding the fee regime in totality is important as the City of Bradfield transitions from the old SIC arrangements to the new HPC regime and the Government then approaches industry for the development of the super-lots which will see the evolution of Bradfield City.

Recommendation 5: that government update the Master Plan to include an estimate of all revenue to be raised by each of the sources for local and State infrastructure to assist industry complete feasibility analyses for their involvement in delivering the vision detailed in this Bradfield City Master Plan.

6. Works in Kind

The Master Plan does not provide an estimate of the estimated total cost or the amount that the government / WPCA / DPHI will allocate as part of their discussion regarding the negotiation of a Works In Kind/Infrastructure Contributions Plan with Liverpool City Council.

Recommendation 6: that DPHI/WPCA update the Master Plan to include an estimated cost of the WIK/ICP with Liverpool City Council.

7. Critical infrastructure

Table 18 (p.28) of the IDS lists their critical infrastructure where Badgerys Creek Road is omitted since it is considered outside of Bradfield (Table 9). This reflects the insularity of the Master Plan.

Critical infrastructure should include roads and water infrastructure that supports development outside the Bradfield City but is critical to the provision of housing and jobs that will compliment any new urban development and deliver such outcomes in the short term.

Understanding how Bradfield City fits in with planning for the broader Western Parkland City is critical to generating interest from industry in Bradfield City itself.

The government should the Draft Master Plan and include details of the timeframe for delivery and estimated total cost, of jobs and housing enabling infrastructure, **outside** Bradfield City, as a critical contextual Appendix to the Bradfield City Master Plan.

Recommendation 7: the government should review Table 18 of the Master Plan and include job and housing enabling infrastructure outside Bradfield City as a critical contextual Appendix to the Bradfield City Master Plan.

8. Infrastructure sequencing

The Bradfield City Master Plan's top priority listed in Table 19 (p. 30), in relation to staging and key infrastructure sequencing is the Metrolink Boulevard.

Urban Taskforce understands this is the 560 metres of the Bradfield Metro Link Road (BLMR) that is within the Bradfield boundary (northeast corner).

The new BLMR is effectively a road to nowhere until the corridor between WPCA's western boundary and Badgerys Creek Road is acquired development begins on the adjoining property; the Eastern Ring Road (ERR) is constructed; and Badgerys Creek Road upgraded.

Urban Taskforce members have expressed great concern that this reflects the inward thinking myopic mindset of the WPCA.

To consider the key item of infrastructure is a road that according to the latest advice and thinking from TfNSW is at least 12 years away and will service a paddock until such time.

Recommendation 8: that DPHI/WPCA establish closer working relationship with industry partners and review the infrastructure sequencing to prioritise infrastructure that may lie outside Bradfield, but are critical to maximising opportunities for jobs and housing that will be needed to service and benefit from the opening of the new Airport.

9. Job Projections

Table 17 of the IDS indicates that from 2026 Bradfield will support between 1,000 and 1,200 jobs in 48,500 square metres of floor area. Unless these are construction jobs, Urban Taskforce members advise that this figure will not be achieved.

According to Table 17 of the IDS, by 2036, this figure rises to 8,300 jobs and 3,100 residents. Working closely with industry to establish opportunities for development of serviced land parcels within the Bradfield City Area will be critical to achieving these targets.

10. Reprioritisation of WIK and SIC items

Table 7 (p.11) and Table 10 (p.16) on lists items like local open space, drainage embellishments, active transport and urban tree canopy as WIK and SIC items. Until appropriate enabling infrastructure outside the boundaries of the City of Bradfield are delivered, such proposals for WIK and SIC items are at best hypothetical as investors and potential tenants may not be attracted to the new City.

Levies and WIK's should not be allocated towards open space, active transport corridors and tree canopy that will not be needed for the next ten years. Instead, they should be applied to infrastructure that can accelerate investment in Bradfield, like the upgrade of Badgerys Creek Road,

construction of the new BMLR and construction of the new Eastern Ring Road.

Recommendation 9: The Master Plan reprioritise WIK and SIC items to focus on investment attracting infrastructure including that which will facilitate the development of the WPCA Badgerys Creek Road upgrade.

11. Art Strategy – employment of artists to work with Planners

Urban Taskforce notes the content of the Art Strategy, and is concerned with some of the prescriptive elements contained within it.

The type of sophisticated developers who will be responsible for delivering Sydney's third city will have the expertise and experience in designing and delivering a modern city.

The idea (whilst prefaced by the qualifier "ideally") that artists will be engage to direct planners (page 46 of the Art Strategy) is overreach and once established in the Master Plan will be an expectation difficult to remove. The Art Strategy should be limited to ideas and concepts and remove

Recommendation 10: that prescriptive recommendations such as employing artists to advice professional and sophisticated urban planners be remove from the draft Master Plan.

Conclusion

What is needed is most is the details of the infrastructure costs, timeframes for delivery and plans for development for the precincts surrounding Bradfield City. What we need is context. How does the Bradfield City Master Plan. Delivering a better understanding of how Bradfield City can be a catalyst for the development of the entire Western Parklands City is part that's missing in this draft document.

Without this, the Master Plan risks not supporting the development of new jobs or new homes, nor the growth of the broader WPCA region.

Urban Taskforce contends that the near decade long fixation with the creation of a new city has been to the detriment of other Western Sydney cities like Penrith, Liverpool and Campbelltown.

The draft Master Plan does not show any significant buy-in from critical NSW Government infrastructure agencies, in particular TfNSW and Sydney Water. Without Treasury and infrastructure agency commitment (and funding), the

Bradfield Master Plan risks being a largely academic exercise in city planning and you can all join your erstwhile leader in Riyadh).

Given that the opening of the new Western Sydney Airport is little more than 2 years away, the NSW Government must reprioritise and focus on working with landholders in the region to bring development online where there is identified demand. By following the market, rather than top-down master planning exercises with timeframes of more than three decades after the opening of the new airport should be put aside in favour of tackling immediate infrastructure constraints that is now holding back and deferring investment in housing and jobs in the short term.

Should you wish to discuss this matter further, please call our Head of Policy, Planning and Research, Stephen Fenn on 9238 3969 or via email stephen@urbantaskforce.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending to the right.

Tom Forrest
Chief Executive Office

Recommendations

Recommendation 1: that the roles and responsibilities of the Western Parkland City Authority are clearly communicated to all stakeholders, and that the Government consider renaming the Western Parkland City Authority the “Bradfield City Development Authority”.

Recommendation 2: that WPCA review the Heights of Building and FSRs to ensure there is opportunity for greater height and density within the Bradfield City Centre.

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