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From: system@accelo.com on behalf of MacroPlan Company
Sent: Friday, 2 November 2018 2:43 PM
To: [REDACTED]
Subject: Submission Details for company MacroPlan (org_comments)
Attachments: 292084_MP_LLG_Aerotropolis Submission_021118.pdf

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Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

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Content:
Please find attached.

IP Address: - 122.102.98.129
Submission: Online Submission from company MacroPlan (org_comments)
https://majorprojects.accelo.com/?action=view_activity&id=292084

Submission for Job: #9552
https://majorprojects.accelo.com/?action=view_job&id=9552

Site: #0
https://majorprojects.accelo.com/?action=view_site&id=0

2 November 2018

Mr. [REDACTED]
Executive Director, Western Sydney and Aerotropolis Activation
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear [REDACTED]

Re: Luddenham Landowners Group (LLG) – Response to Aerotropolis Stage 1 LUIIP

Background

MacroPlan has been engaged by the Luddenham Landowners Group (LLG) to make representations on its behalf with respect to the Western Sydney Aerotropolis Stage 1 Land Use and Infrastructure Implementation Plan (LUIIP).

LLG controls approximately 700ha of land located north-west of Luddenham village. The land is less than 3 kilometres from the Western Sydney Airport (WSA) and is ideally placed to contribute to the vision for the area as outlined in the exhibited LUIIP.

The strategic relevance of the LLG landholdings is discussed in this submission.

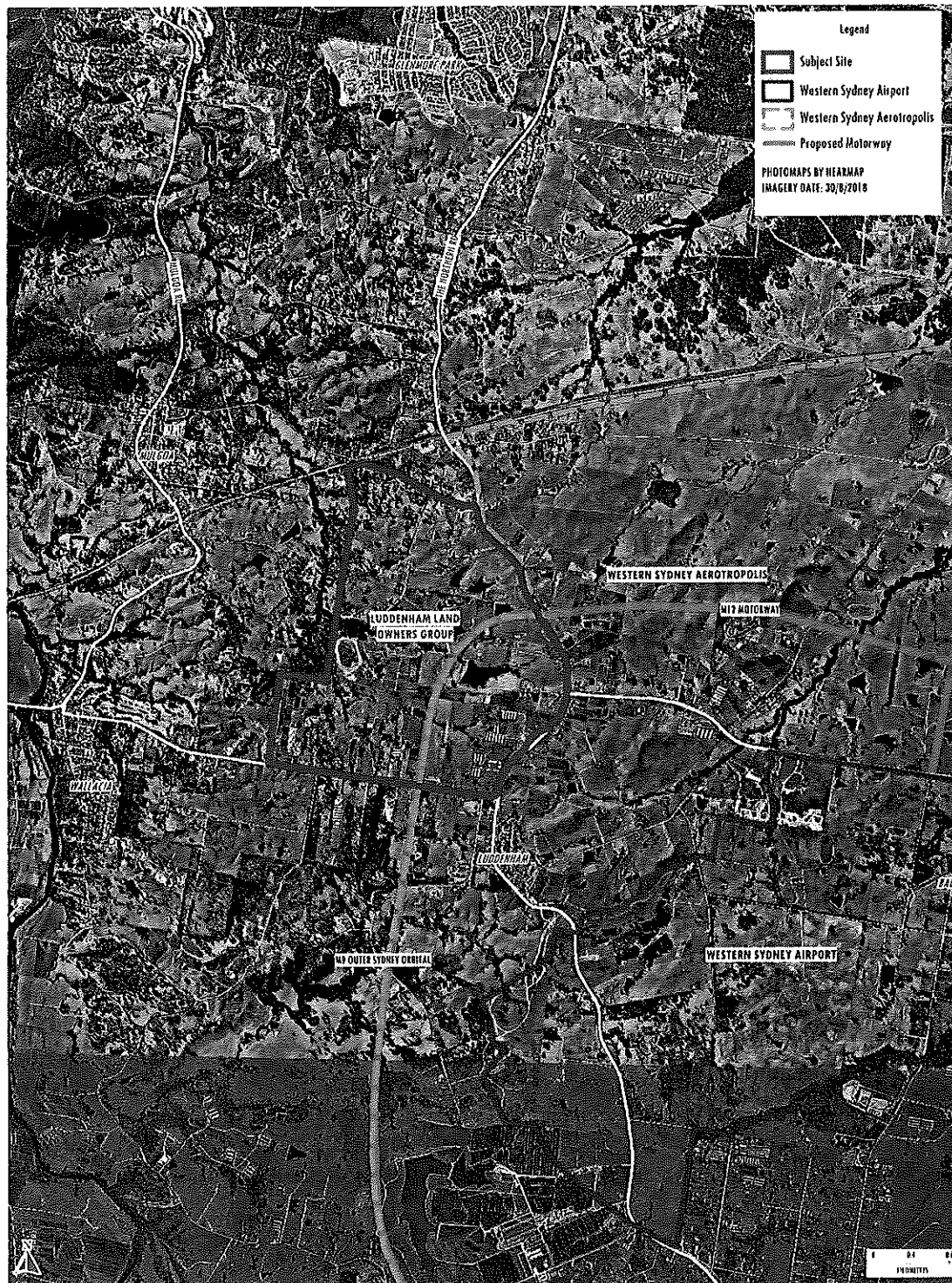
Site Context

The LLG's land holdings are zoned RU 1 Primary Production and RU 2 Rural Landscape under the Penrith LEP 2010 and are included within the Metropolitan Rural Area (MRA) identified by the Greater Sydney Commission's Region and Western City District Plans. The land fronts The Northern Road and is dissected by the proposed Outer Sydney Orbital (M9) but is only partly included within the Western Sydney Aerotropolis.

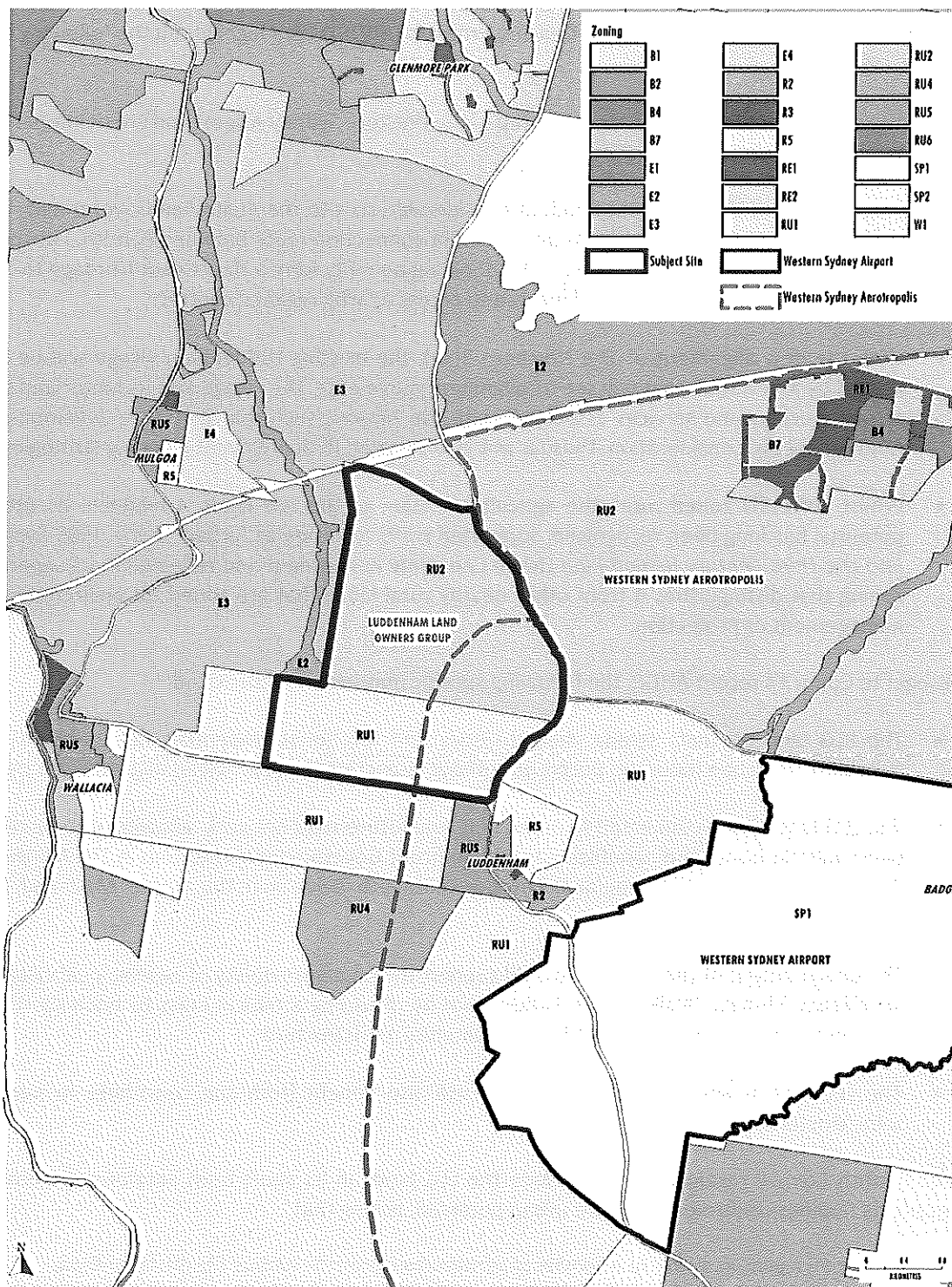
The land is large in size and is not, like other nearby lands, constrained by environmental factors or future aircraft noise. The land is located immediately west of The Northern Road which is currently being upgraded to six lanes plus dedicated busways and cycleways.

The LLG holdings (edged red on the zoning map on page 3) is similarly zoned as land to its east (edged blue) which is identified in the LUIIP as 'Flexible Employment' and 'Mixed Flexible Employment and Urban Land' and is positioned within the 'North Luddenham' and 'Northern Gateway' precincts (refer to **Appendix A**). Land to the north and west of the LLG lands is zoned E3 'Environmental Management'.

The strategic location and zoning of the LLG lands is depicted in the maps below.



Luddenham Regional Context



Luddenham Zoning

Previous Submissions

Previous submissions made with respect to the LLG land, i.e. to the draft District and Region Plans and to Penrith Council's Accelerated Housing Delivery Program (AHDP), have highlighted the following key matters:

- The LLG landholdings are on the doorstep of the Western Sydney Airport and are not impacted by aircraft noise.
- The upgrade of The Northern Road, at considerable cost to the Australian Government, will improve its capacity to function as an important connection route between Penrith, Liverpool and Camden/Campbelltown. The LLG landholding benefits from a direct 4km-frontage to The Northern Road, meaning it is well located to access nearby regional centres.
- With the new alignment of The Northern Road, the existing Luddenham village will be bypassed by a deviation that will see its alignment move east. The village and its hinterland will attract workers and services associated with the Airport, such that its future development requires special consideration, thus far not incorporated in the relevant planning strategies.
- Whilst currently zoned rural, the agricultural value of the LLG lands is minimal. Its urban potential has long been recognised, supported by its inclusion as 'urban' in the *1989 Sydney into the Third Century Region Plan* Urban Capability Assessment and reflected in its separate zoning that distinguishes it from other nearby rural lands that are zoned for environmental management or protection.

In respect to Council's recent AHDP, the following specific matters were identified:

- The LLG land presents strong characteristics and locational credentials favourable to its suitability for urban (housing) purposes without impacting the (east-west) aligned flight path.
- The LLG land is well connected to an existing and future road network, allowing it to develop over multiple fronts and benefitting from significant Government investment in The Northern Road, a key north-south regional corridor, Elizabeth Drive and the future M12 and M9 corridors.
- The development of the LLG land would support the ongoing viability of nearby local villages, specifically Mulgoa, Wallacia and Luddenham by providing a critical mass to underpin their economic sustainability, jobs and local community infrastructure.
- The LLG land is able to be serviced, and will also benefit from and contribute to nearby infrastructure upgrades.

Whilst Penrith Council resolved not to include the LLG lands in its short-term accelerated housing program, its findings confirmed its future urban potential, noting that:

The land is highly accessible to a number of infrastructure projects, such as The Northern Road, Western Sydney Airport and WSPGA. Development for the purposes of urban housing could respond to these, however, other land uses could also be appropriate.

In this respect, the LLG land is more suited to urban intensification than many other parts of the Western City, especially given its proximity to major transport services and to a major planned

employment and activity hub. The consideration of this potential, however, has not been realised because of the lands inclusion within the Metropolitan Rural Area (MRA).

Current Context

The release of the draft Aerotropolis LUIIP has confirmed that the LLG lands will not be considered by Government as part of its immediate plans for the Western Sydney Airport Growth Area.

This decision does not, however, undermine the land's urban potential. In fact, development of the lands can still be considered in the broader context of the Aerotropolis, albeit as part of a separate process.

In this light we note that:

- The current strategic focus of the Aerotropolis has shifted the 'centre of gravity' for the Western Parkland City, with a concurrent interest in the employment and residential land uses required to support this shift. Notwithstanding, very little consideration has been given in the draft LUIIP to the type, location and mix of necessary residential development, nor to current market need for employment and industrial land that could accommodate current employment demand.
- The LLG lands present as a suitable residential (and urban land use) location. Notably the Airport alignment means that land to the north-west (including the LLG land) and to the south-east of the runway is the only land proximate to the Airport that is suited to residential development. The LLG lands are not impacted by the ANEC/ANEF noise contours.
- Development of the LLG lands would not compromise the initial development of the Northern Gateway or Aerotropolis Core precincts. Indeed, it is complementary to these initial stages as it reaffirms the north-south axis of growth and can be served by already upgraded infrastructure (The Northern Road). It is noted that the three initial precincts are totally dependent on the completion of other major infrastructure elements.
- Development of the LLG lands will support the Government's ambition to create flexible employment land uses immediately around the Airport, and grow this into a world class employment hub leveraging the Airport investment. With the extent of jobs planned to be located within the Western Sydney Airport Growth Area, providing homes nearby is essential to ensure workers have housing options close to jobs.
- The North Luddenham Precinct's key focus of high technology and research associated with food production and processing near the Outer Sydney Orbital and Agriculture and Agribusiness Precinct presents an opportunity to support this vision in a residential manner by capitalising on its proximity to the Aerotropolis and lack of ANEC impact, which is an inevitable challenge for residential development near the WSA in years to come.
- Some of the land within the Aerotropolis is largely fragmented, which will impact on development timing and delivery. The LLG lands are individually owned but available collectively for development. There is very strong market interest in the LLG lands as a whole and in delivering a form of land use on them that cannot be incorporated within the Aerotropolis boundaries.

- Concurrent development outside the Aerotropolis boundary ought not be dismissed, particularly if it serves a different purpose to the scale, type and mix of development that is envisaged within the Aerotropolis confines. The provision of residential development on the LLG lands further supports the opportunity to deliver a 30-minute city given the significant infrastructure and employment opportunities being created within the Western Parkland City and the Aerotropolis.
- The realignment of The Northern Road to the east of the Luddenham village provides an opportunity for the LLG lands to become an extension of an existing local centre and further support local services and job opportunities.
- More intensive residential development has been permitted to occur within Sydney's MRA. Examples include Richmond and Windsor.

Included in appendices to this submission are a series of maps, tables and case studies which provide further support to the above comments and arguments.

Appendix A provides a series of maps and images that identify the strategic location of the LLG lands.

Appendix B includes a series of tables which outline the level of supporting population (critical mass) required to support urban infrastructure. This is relevant to the consideration of the future amenity and sustainability of villages near to the subject lands.

Appendix C incorporates a commentary on the type of residential estate that the market is interested in delivering at Luddenham.

Possible Future Pathway

Land to the north-west of the Airport is suited to and should be considered for urban (residential) land use. Such action is recommended to address and balance the heavy emphasis placed on job generation in the current draft Aerotropolis LUIP. A suggested approach to housing in and around the Aerotropolis could state:

"Housing will be provided in a variety of locations well related to centres of employment including the new Western Sydney Airport and well connected to either existing or planned new infrastructure. Sites which are of a sufficient scale to provide a mix of dwelling types and sizes in such locations will be supported. The Plan should enable a broad range of housing types and sizes to be provided, ranging from higher density key-worker and affordable housing through to lower density detached executive housing. These can all make a contribution towards building future communities."

Similar to the process applied at Wilton, it is suggested that a flexible 'Urban Development Zone' (UDZ) be applied to the LLG lands, pending the outcome of detailed studies for the area, to enable these lands to provide suitable land uses that complement the Airport and Aerotropolis.

The UDZ allows for strategic planning directions to be given more prominence once detailed site, engineering and urban design work is undertaken. The creation of this broad urban development zone that links to strategic planning work and enables more detailed planning, is a feature of successful land release processes in Victoria, Queensland and Western Australia and has recently been introduced in NSW.

The first step would be an acknowledgement that this location is not inconsistent with an 'Urban Area' classification in the relevant strategic planning documents.

Notwithstanding the location of the LLG lands (mostly) outside the Western Sydney Aerotropolis LUIIP boundary, strategic sites such as this should still be acknowledged and progressed in a planning sense. The new Development Authority that has been established, in implementing the proposed Planning Partnership approach, has a role in ensuring that major sites on the periphery of the Aerotropolis are coordinated with the planning for land within the LUIIP itself. Lands inside and outside the LUIIP need to be recognised for the different roles they play in ensuring the best planning outcome for the Western City.

Conclusion

The above analysis demonstrates the proximity of the LLG land holdings to new urban infrastructure and to the Western Sydney Airport. The LLG lands are 3 kilometres from the planned Airport and, importantly, are not impacted by aircraft noise. The land is almost 700ha in area. Strong market interest exists for developing the land for urban (residential) purposes which is expected to provide an both an executive and mixed-housing option to supplement other housing offers from within the Aerotropolis boundaries and elsewhere.

The LLG landholding has excellent credentials for its identification as urban capable land, and ultimately to form part of a new Urban Development Zone. This flexible zone would allow for detailed studies to be undertaken to consider the feasibility of the land for specific urban purposes. Subject to set criteria being met, the land could then progress to early release.

The LLG is willing and able to fund such studies and to work closely with agencies to secure a logical planning outcome for its land. On behalf of the LLG we look forward to this opportunity.

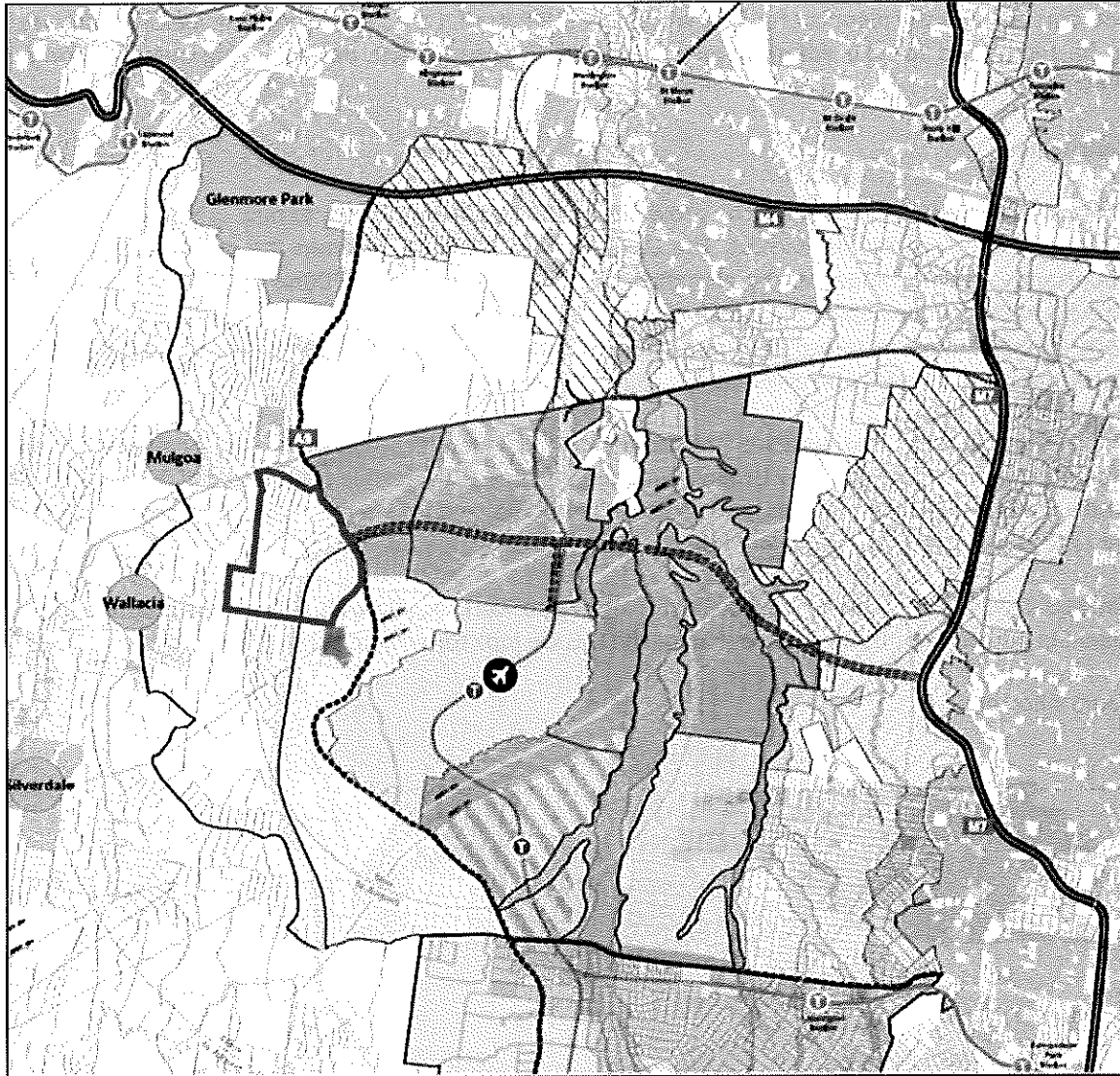
Yours sincerely,



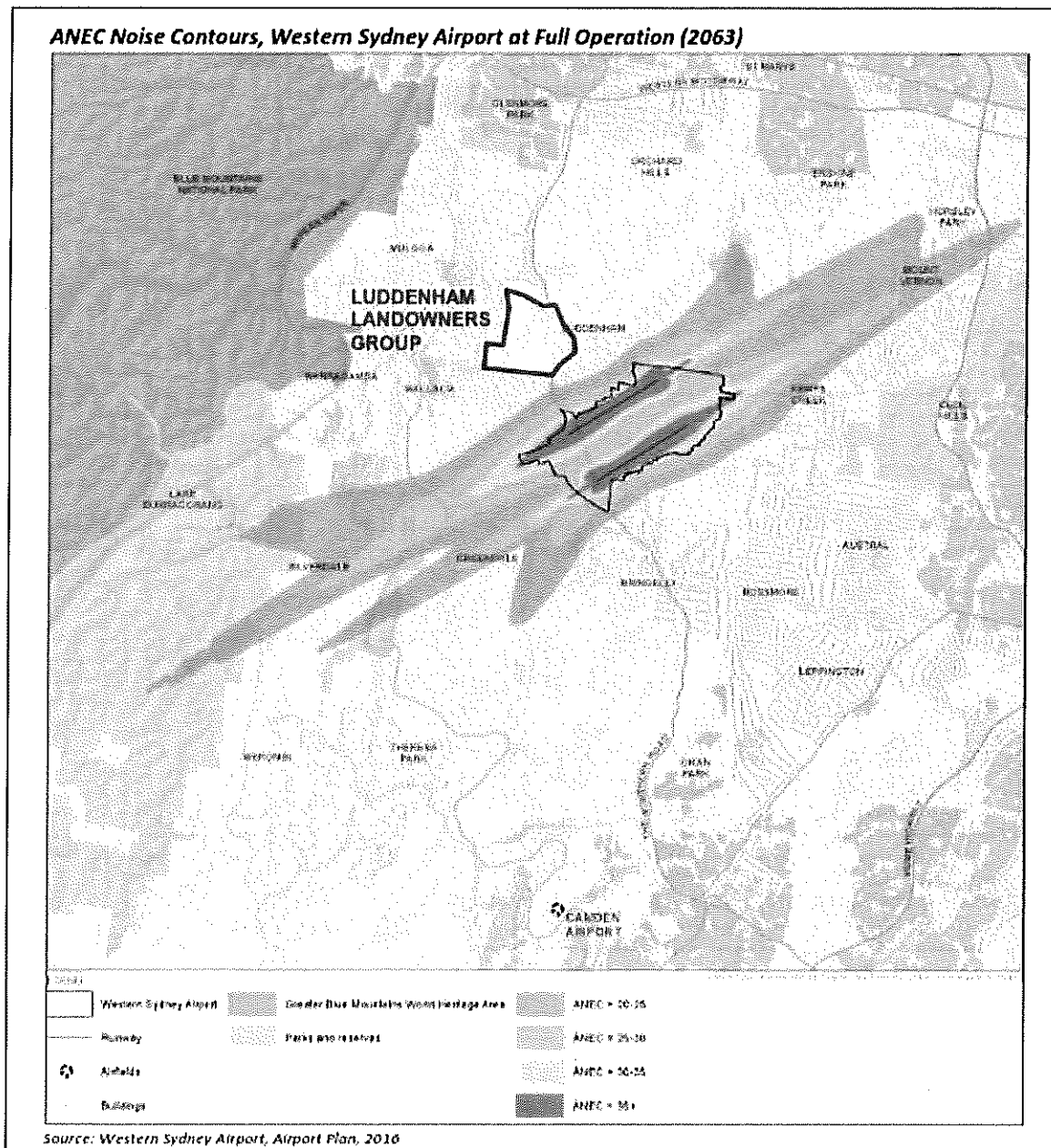
Wayne Gersbach
General Manager - NSW

Appendix A: Maps and Images

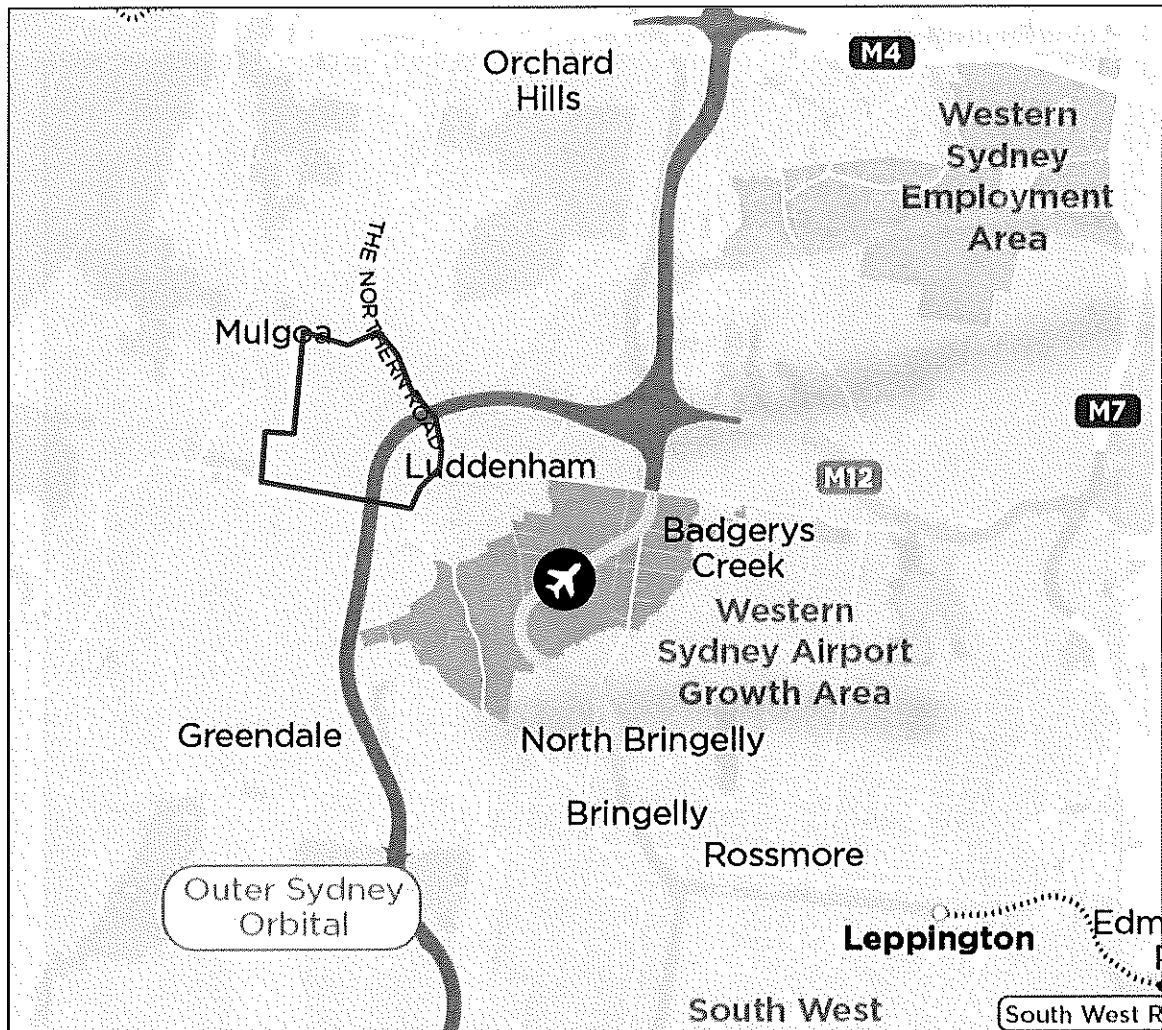
Site Locality and LU/UP proposed land-uses



Site Location in relation to ANEC Contours



Proposed Outer Sydney Orbital Alignment



Appendix B: Community Infrastructure Benchmarking Research

MacroPlan's analysis highlights the benefits of critical mass in delivering services and amenity to rural townships.

The following tables demonstrate the relationship between population mass and a town's ability to support local community infrastructure and services.

Table 1: NSW - Benchmark Service Provisions							
Population Thresholds / Town Sizes							
Service	Employment Potential (Jobs)	5000	10000	15000	20000	25000	30000
Full Line Supermarket Woolworths/Coles (or)	100-150	0.625	1.25	1.875	2.5	3.125	3.75
Medium Line Supermarket IGA/Local Grocer	60-80	1	2	3	4	5	6
Public Primary Schools @ 3 per dwelling	55-65	1	2	3	4	5	6
Public High School @ 3 per dwelling	55-65	0	0	1	1.5	1.9	2.2
Local Centre	50 - 85	0	1	2	3	4	5
Aged Care Housing	Subject to further investigation	0	1	1.5	2	2.5	3
Community Health Care	75-85	0	0	0.75	1	1.25	1.5
Youth Centre	Subject to further investigation	0	0	0.75	1	1.25	1.5
Community Service Centre	Subject to further investigation	0	0	0.75	1	1.25	1.5
Library	90-100	0	0	0	0	0	1
District Centre	70 - 90	0	0	0.75	1	1.25	1.5
Child Care - places	18-30	65	130	195	260	325	390

Table 2: NSW - Benchmark Recreation Provisions		Population Threshold / Town Sizes					
Recreational Areas	Employment Potential (Jobs)	5000	10000	15000	20000	25000	30000
Local Sports Ground	N/A	0.5	1	1.5	2	2.5	3
District Sports Ground	N/A	0	0	0	0	0	1
Local Tennis Centre	N/A	0.5	1	1.5	2	2.5	3
District Tennis Centre	N/A	0	0	0	0	0	1
Local Netball/Basketball facility	N/A	0.5	1	1.5	2	2.5	3
District Netball/Basketball facility	N/A	0	0	0	0	0	1
Lawn Bowls	N/A	0	0	0	0	0	1

Appendix C: Residential Estates – leading by example

Other states in Australia have successfully delivered high-quality residential estates in greenfield locations for some years. The same quality of presentation and outcomes, however, has not been possible in Sydney, for a number of reasons – mainly attributable to underlying land values and planning approaches.

The LLG land holdings present a unique opportunity for a first-class residential estate to be delivered in Sydney's west providing a valuable mix of housing options in proximity to transport services and at the doorstep of Western Sydney's most significant employment hub – the Western Sydney Aerotropolis.

Some examples of quality estates delivered in other states across Australia are presented below.

Settlers Hills by Stockland:

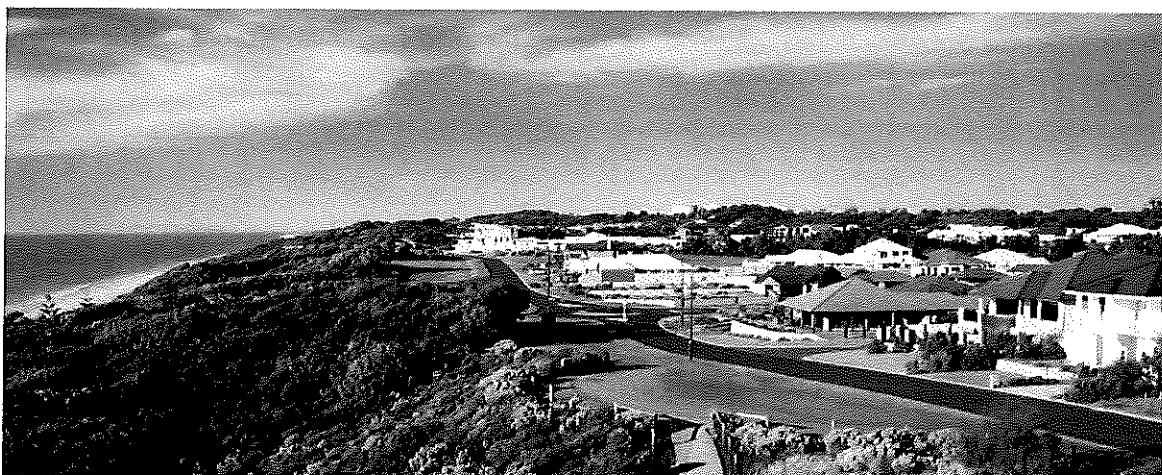
Located 45kms south of Perth and 10 minutes from Rockingham, Settlers Hills' formerly rural character, combined with its location at the junction of key arterial transport routes, inspired planning for a community whose rich environmental heritage is as important as economic and social sustainability.

The estate boasts a unique mix of rural character and modern convenience. Planners and developers have given significant effort to preserving the natural landscape which includes majestic Tuart Trees, gently rolling hills and wide-open spaces, while also providing a convenient and modern community.

Settlers Hill is located a short distance from major infrastructure including two schools (Tranby College and Settlers Primary School), several parks and gardens, two lakes and a world class cricket oval. Settlers Hill is a premium estate that will be home to over 6,000 people upon completion.

Dalyellup Beach Estate by Satterley

The Dalyellup Beach estate boasts its own well-established village with a new district centre that accommodates a Woolworths, Bakers Delight, Liquor Barons, with a vet and private and public schools in the area. Dalyellup Beach Estate is an award-winning master planned community and delivers Satterley's vision of over 130 hectares of coastal reserve, 50 hectares of Tuart forest, and 11 hectares of beautiful foreshore reserve with a further 14% of open space within the Estate.



The Vines by LWP at Ellenbrook

The Vines at Ellenbrook is a premium estate located 25km north-west of Perth CBD with beautiful parks and vistas, shops, schools and a wide range of facilities on your doorstep, making it a great place to live.

Transport links to The Vines will be great shortly, with the Tonkin Highway extension off ramp into Ellenbrook and the 'dualing' of Lord Street nearing completion and planning for Metronet underway. As such the area will soon have great transport connections. The area consists of three communities to choose from, all delivering different housing sub-markets and specifically targeting families.



Eynesbury Victoria

Eynesbury in Victoria is a 1,224ha township on Melbourne's western fringe. The Vision for Eynesbury Township is focused on leisure and tourism for international and national visitors and local residents in the region. The site is strategically located within the Cities of Melton and Wyndham, adjacent to the Werribee River, 40km west of Melbourne's CBD.

The township currently comprises approximately 750 homes with a population in excess of 2,000. It is anticipated that once the vision is realised, the proposed Eynesbury Township will generate in excess of 10,000 new jobs for Melbourne's west. Every home in Eynesbury is connected to Class A recycled water, sourced from the Western Water Purification Plant at Surbiton Park. Eynesbury is also home to the 270hectare Grey Box Forest which forms the entrance to the township, one of the largest remaining Grey Box Forests in Victoria.

