

[REDACTED]

From: system@accelo.com on behalf of Knight Frank Town Planning Company
Sent: Friday, 2 November 2018 2:49 PM
To: [REDACTED]
Subject: Submission Details for company Knight Frank Town Planning (org_comments)
Attachments: 292090_KFTP LUIIP Submission Kennett 20181102.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Knight Frank Town Planning Company
Organisation: Knight Frank Town Planning (Senior Planner)
Govt. Agency: No
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Sydney, NSW
2000

Content:
See attached

IP Address: - 161.43.95.254
Submission: Online Submission from company Knight Frank Town Planning (org_comments)
https://majorprojects.accelo.com/?action=view_activity&id=292090

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

Lodged Online: <http://planspolicies.planning.nsw.gov.au>

Dear Mr [REDACTED]

Submission: Draft Aerotropolis Land use and Infrastructure Implementation Plan (Our Ref. 18-047)

Knight Frank Town Planning has been engaged by the Kennett Family to prepare this submission on the Department of Planning and Environment's (DPE) *Draft Western Sydney Aerotropolis Land use and Infrastructure Implementation Plan, Stage 1 initial precincts* (hereinafter referred to as the Draft LUIIP). On behalf of our client, we thank you for the opportunity to comment on the Draft LUIIP.

Our client owns a large parcel of land, approximately 80 hectares at Luddenham, off Luddenham Road. These landholdings are located at [REDACTED] and [REDACTED]. The majority of our client's landholding is located within the Northern Gateway precinct, which has been identified as one of the 'Initial Precincts' for development in the Aerotropolis (See Figure 1). The remainder of our client's landholding is located within the area identified as a 'Related Precinct' in the Draft LUIIP.

This submission should be read in conjunction with the accompanying plans prepared by PAA Design – see Appendix 1.

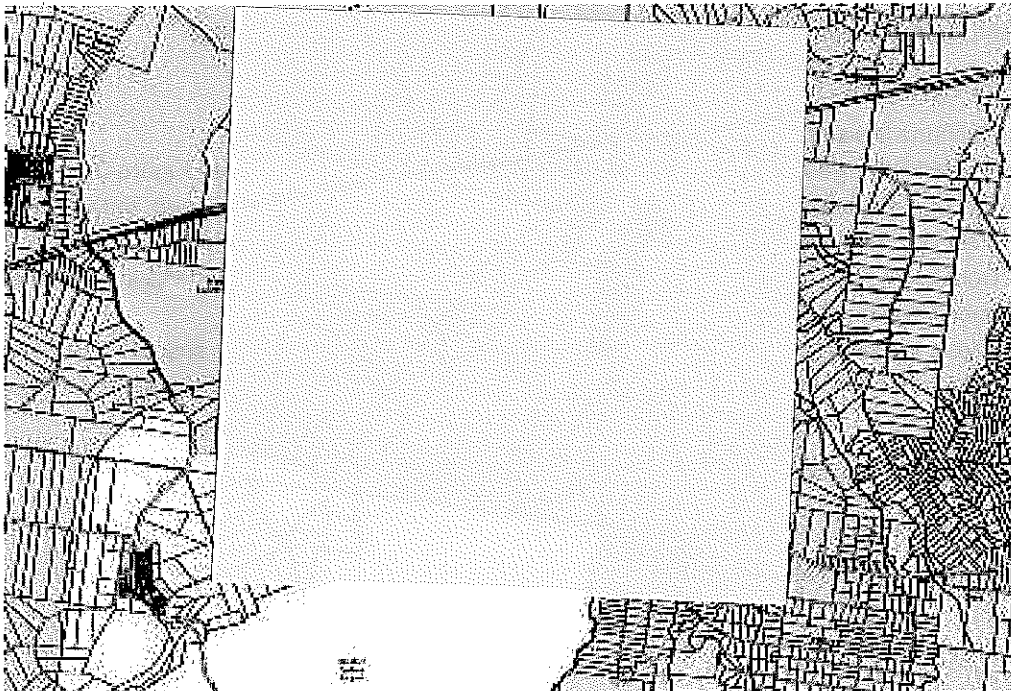


Figure 1: Aerotropolis Cadastre Map (Source: DPE) – Client's Landholding outlined in red

Arbitrary Development Boundary

For the reasons as set out below, the Draft LUIIP fails to acknowledge the development potential of our client's land or the significant disruption to its orderly, efficient and economic use as a result of the transport corridor alignments crossing the property. No other property in the whole of the Draft LUIIP area is as adversely affected by the proposed transport corridors. This is a significant impost on the development potential of the property.

By reference to the Draft LUIIP land use and structure plan, we note that the adjoining land under different ownership immediately to the south of our client's land has been identified as 'Mixed Flexible Employment and Urban Land' or what might otherwise be described as mixed use. This coincides with the Sydney Science Park – a mixed use community already approved and under construction. Our clients land however has been identified as flexible employment (See Figure 1).

We strongly suggest that there is no planning basis for limiting mixed use development to the Sydney Science Park. The land ownership boundary is an arbitrary development boundary that results in a less than optimal urban development outcome and is contrary to good planning, urban design and place based outcomes. The Draft LUIIP provides no justification for the land use change between the two properties. In the absence of any such justification, it is reasonable to conclude that the imposing of the transport corridors across our client's property has influenced the land use planning response rather than the optimal urban development outcome.

Extension of Mixed Flexible Employment and Urban Land

Accordingly, and on behalf of our client we recommend that the 'Flexible Employment and Urban Land' be extended to the north to include their landholding. Our client's landholding is suitable for a mixed use development for reasons including the following:

- Large landholding capable of supporting a mixed use development (80 hectares)
- Adjacent to a proposed mixed use Science Park precinct
 - Confirms the suitability of this location for mixed use development
 - Sensible and geographical extension of the Science Park precinct (See Figure 2)
 - Walking distance to the proposed new Science Park town centre and railway station, including part of the site within the 800m walkable catchment (See Appendix maps)
 - Consistent with governments intention to encourage housing within walking distance of public transport access and providing a 30 min city
 - Mixed use development at this location would make best use of transport and services infrastructure already committed to by Government, as well as social infrastructure proposed at the Science Park precinct
- Adjacent to the existing residential development (Twin Creek)
- Mostly unconstrained by South Creek flooding
- Outside the noise zone (ANEC/ANEF 20) and therefore suitable for residential development

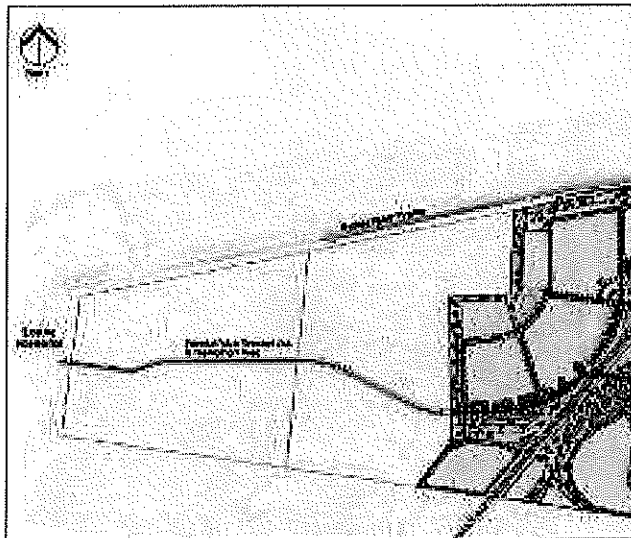


Figure 2 – Science Park and Clients landholding (Source: Penrith Council)

Figure 3 illustrates a proposed extension of the 'Flexible Employment and Urban Land' north to include our client's land. This extension by consolidating urban development adjacent to the Sydney Science Centre and expected rail station is entirely consistent with the *Future Transport 2056* which identifies:

"The importance of transport interchanges as places which will have a high level of accessibility which is enhanced as service frequencies and travel times are improved. There will be potential for interchanges to deliver mixed-use, walkable, cycle-friendly centres and neighbourhoods. As service frequencies and travel times are improved, there is a need for councils to consider local conditions through placebased planning that provides for centres around interchanges to grow and evolve over time" (GSC, Western City District Plan, pg. 51)

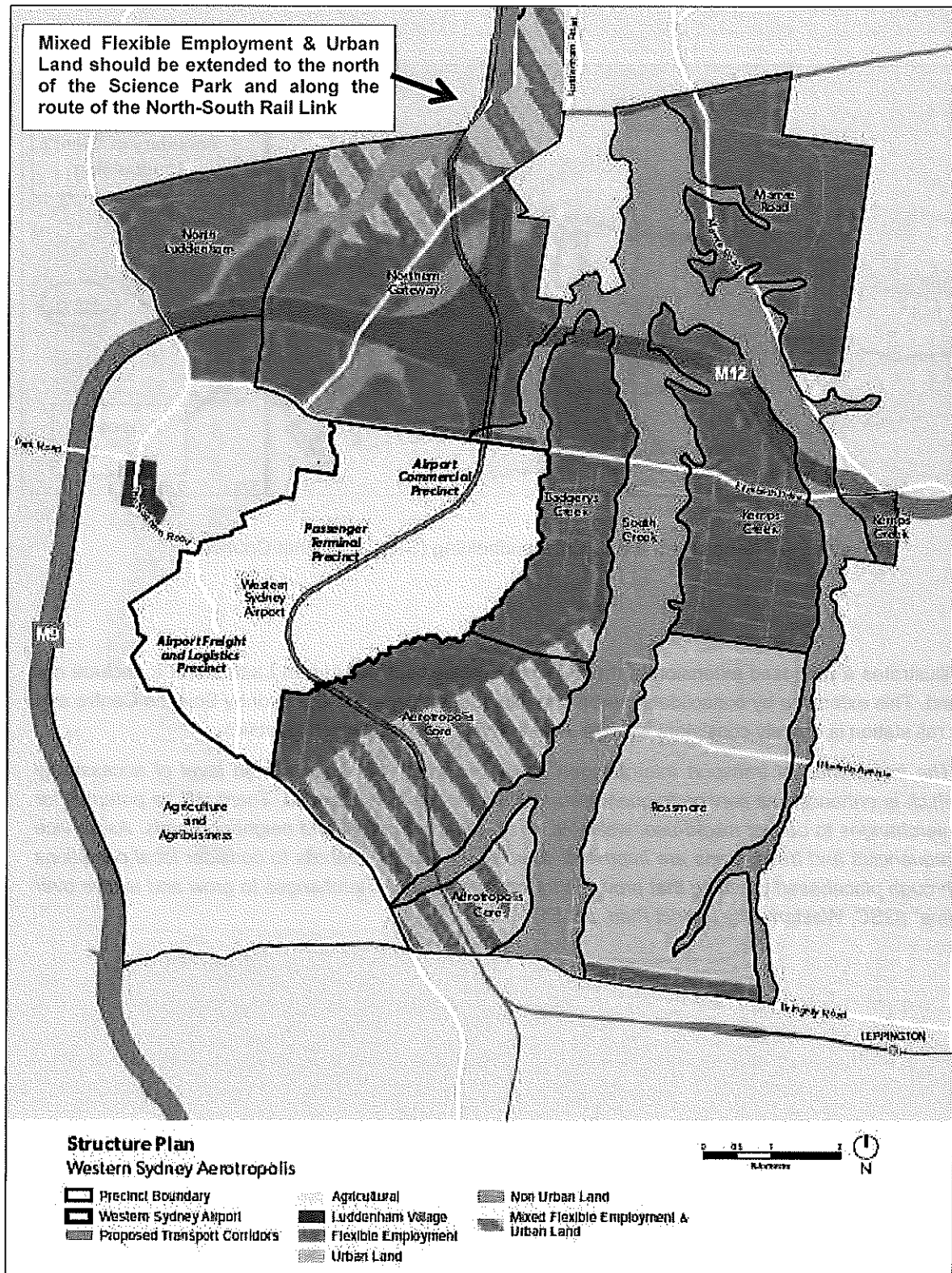


Figure 3: Extension of Mixed Flexible Employment & Urban Land (Source: DPE, Draft LUIP) - amended

Realignment of transport corridors

On behalf of our client we strongly suggest that the current alignments of the North-South Rail Link, Outer and Sydney Orbital (freight and motorway) and Western Sydney Freight line transport corridors result in a poor and inefficient planning and development outcome that increases the overall corridor infrastructure footprint and associated impacts in a cumulative way, including:

- Restricting access between development parcels on our client's land;
- Increasing the physical extent of noise and amenity impacts (including impacts on Twin Creeks);
- Reduces the available land for urban purposes more than an alternative proposal and is therefore not the optimum planning outcome;
- Makes poor use of the existing topography to ameliorate the impacts on amenity;
- Inefficiencies in the duplicating of major construction costs across multiple corridors; and
- The greater costs in servicing and accessing smaller development parcels fragmented by the multiple corridors.

The extent to which our client's land is proposed to be burdened by the current corridor alignments compared to other landholdings is disproportionate and not an equitable outcome. A realignment of the corridors that minimizes the extent of impact on any one property should be the basis of corridor planning.

The plans provided by PAA Design at **Appendix 1**, illustrate an alternative option that provides a better planning outcome having regard to the lands to the south of the Warragamba pipeline within the Northern Gateway precinct, in terms of:

- A coordinated approach;
- Proper nesting of infrastructure;
- Allows for future expansion of use of the acquired corridors and avoids further costly acquisition and avoids piece meal approach;
- It has a smaller footprint and reduces the physical extent of potential amenity impacts by containing the infrastructure within a smaller footprint (and moving the infrastructure away from Twin Creeks);
- It creates a fairer distribution of impacts and benefits across our client's holdings and the Sydney Science Park, and Twin Creeks;
- With appropriate design, vehicular and pedestrian access to the station across the corridor can be retained and the walkable catchment around the station can be increased by capturing land within our client's holding. This would lead to a better planning outcome and improved use of the railway infrastructure; and
- The alternative proposal also provides a more efficient planning outcome for future urban lands to the north of the Warragamba pipeline, by increasing the area land available for future urban use.


In considering the above, it is recommended that a whole of corridor planning review of the alignments from our client's land north to the M4 Motorway be undertaken in consultation with all affected landowners.

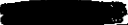

It is also recommended that no final decision be made on the corridor alignments until the completing of the land use planning for the Northern Gateway precinct. This is the only way to ensure an optimal planning and development outcome. To make such a decision beforehand will only prejudice and significantly limit the land use options.

In summary, on behalf of our client we recommend that the Draft LUIP be amended as follows:

- The Mixed Flexible Urban and Employment zoning for the Science Park should be extended north to include their landholding.
- Transport corridors should be reviewed and realigned to provide a better land use, urban design and planning outcome for both Government and our client's land holding.
- To reference that no final decision be made on the corridor alignments until the completing of the land use planning for the Northern Gateway.
- To reference that a whole of corridor planning review of the alignments from our client's land north to the M4 Motorway be undertaken in consultation with all affected landowners.

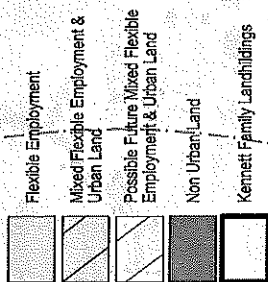
If you have any queries please do not hesitate to contact me.



Yours sincerely
Mark Grayson
Director, Knight Frank Town Planning
Ph: 


Appendix 1 – Concept Plans (PAA Design)

Legend



Kennett Family Landholdings
443 Luddenham Road, Luddenham

paa.design
Peter Andrews + Associates Pty Ltd

Architecture • Planning • Urban Design • Landscape Architecture

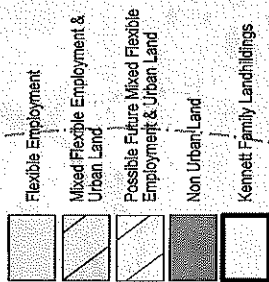
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Notified Architect • Peer Review (Notified Register for 2012)



2 Concept A On Grade Option

Legend



Kennett Family Landholdings
443 Luddenham Road, Luddenham

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