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Subject: Submission Details for company Elton Consulting (org_comments)
Attachments: 292108_Submission LUIP Final.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

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2 November 2018

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

Dear Madame

**Submission Western Sydney Aerotropolis – Land Use and Infrastructure
Implementation Plan Stage 1 Initial Precinct**

This submission has been prepared by Elton Consulting on behalf of Luddenham Property Group Pty Ltd.

Luddenham Property Group congratulates the Department of Planning and Environment on the release of the *Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan Stage 1: Initial Precincts* (LUIIP) document. We agree that establishing a vision for the Aerotropolis and the sequencing approach will provide the greatest foundation for the successful delivery of land for development to support the economic growth of Greater Western Sydney.

As you are aware, our interest is in land at Luddenham. We have made a number of representations in the past 12-18 months including a submission to the Greater Sydney Commission on the District Plan in April 2017 and correspondence to DPE ahead of the preparation of Stage 1 of the LUIIP and a submission to RMS in relation to the alignment and proposed access arrangements for the M12.

The key issues for our site in relation to the LUIIP are two fold:

Firstly, the LUIIP needs to include a more detailed concept plan for the location of key infrastructure; roads, water, electricity and sewer.

Second, the plan needs to include a mechanism by which that infrastructure is funded and delivered including where necessary acquisition of key linkages. Understanding the costs, timeframes and availability of key infrastructure is an essential element of feasibility. The plan should provide a clear set of guidelines establishing the process for development of key sites. Larger land holdings and willing development groups need to be supported as they will simulate growth and development of smaller, more fragmented parcels and be instrumental in the delivery of the wider vision.

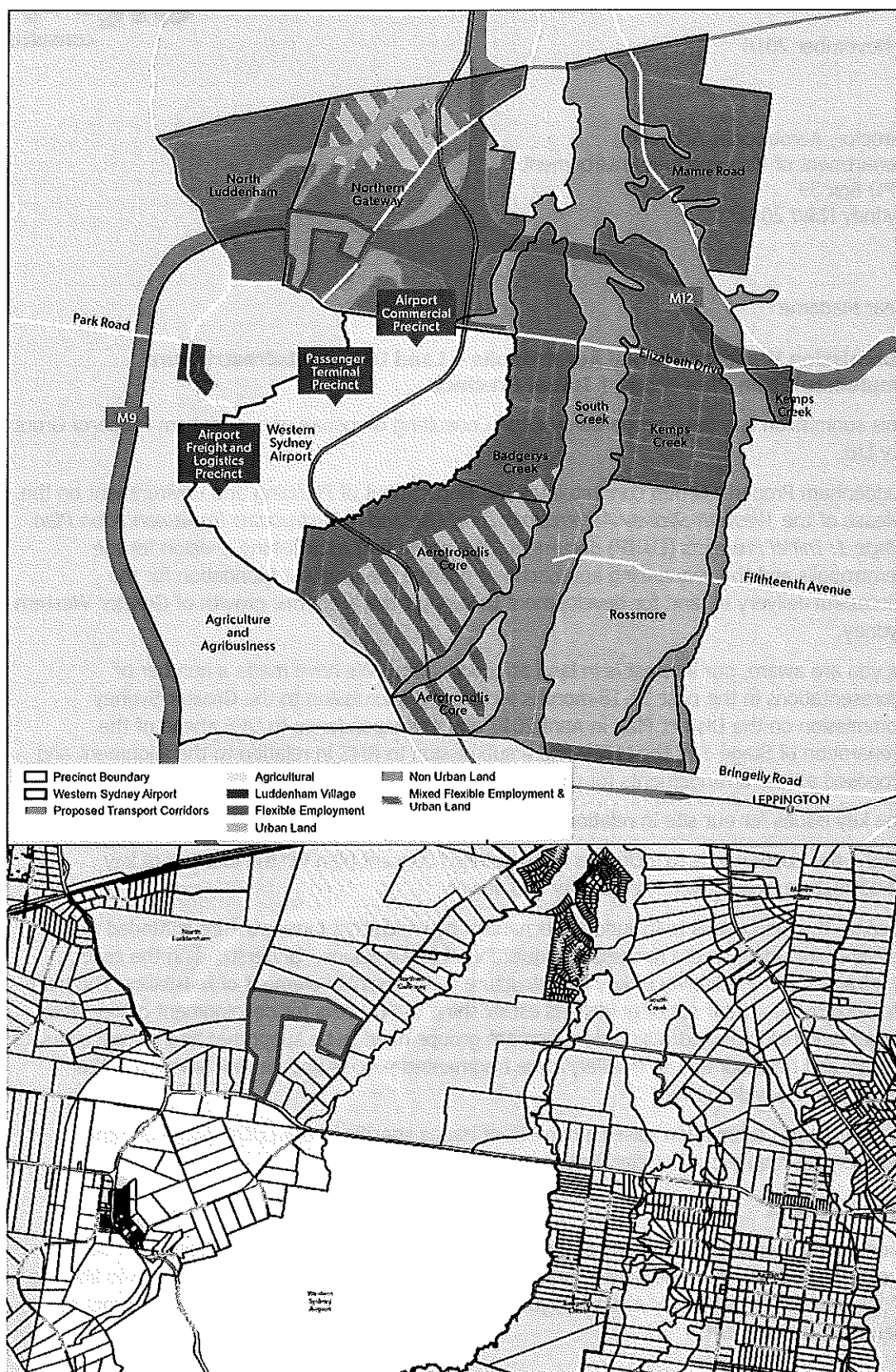
In addition the submission raises a number of issues specific to the LUIIP document and matters that require further clarification.

Site Context

Luddenham Property Group have a parcel of land with 170m frontage to Elizabeth Drive at Luddenham, 1 km from the intersection with the Northern Road and less and 700m to the site of the new Western Sydney Airport (Figure 1) and within the Northern Gateway Precinct as identified in the LUIIP.



Figure 1: Subject Site



Source: Extract DPE Mapping with Cadastral boundaries https://www.planning.nsw.gov.au/-/media/Images/DPE/Maps/map_western_sydney_aerotropolis_stage_structure_plan_2008x1866.ashx sourced 30/10/18

Luddenham Property Group and adjoining landowners have collaborated to provide the opportunity for a larger development parcel. A larger and consolidated portion of land will enable a second access point to Luddenham Road and provide a site suitable for the development of large format warehouse, distribution and logistics and business enterprise corridor consistent with the Structure Plan which identifies the site was **flexible employment** land.

The site is approximately 98ha and includes the following parcels of land:

Table 1 Property Information

Address and legal	Legal description	Ha*
2207 -2230 Elizabeth Drive, Luddenham	Lot 1 DP529885	36.6
775 Luddenham Road, Luddenham	Lot 1 DP228498	16.5
777-819 Luddenham Road, Luddenham	Lot 26 DP604586	31.7
765 Luddenham Road, Luddenham	Lot 25 DP604586	12.9

Note: * Areas are approximate

The site is shown Figure 2 below.

Figure 2 Subject Site



Source: Elton Consulting 2018, SixMaps.

The site is located approximately 1km from the intersection of Elizabeth Drive and the Northern Road. This intersection has been identified to be upgraded as part of the Northern Road Upgrade. The Northern Road Upgrade is a priority in the *Western Sydney Infrastructure Plan* and will increase the capacity and reduce congestion along the major route. A new four-way traffic light intersection will connect the realigned The Northern Road, the existing The Northern Road and the realigned Elizabeth Drive. Planning for this work is currently underway and will be funded through the Western Sydney City Deal.

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The Proposal

The Luddenham Property Group propose to develop the site for large format logistics, warehousing and employment lands taking advantage of the proximity to transport infrastructure, both existing and proposed, as well as the prominent position of the site in relation to the Western Sydney Airport.

The Elizabeth Drive parcel has been selected because of the large area in a single holding. The intended use will require large lots to accommodate floor plates up to and in excess of 20,000m². The end use will also necessitate through access for semi-trailers, B - Doubles and B - Triples. Access through the site is critical. Previous representations made to the adjoining owner of 821-849 Luddenham Rd have been unsuccessful with the landowner uninterested in collaboration. The layout therefore was accommodated using access to Luddenham Road via Lot 1 DP 228498, 777-819 Luddenham Road. Action for RMS in preliminary design work for the M12 will now make this impossible without either a modification to the M12 alignment or a small portion of land from 821-849 Luddenham road. This is discussed further below.

The configuration of the land facilitates the construction of spine road through the land between Elizabeth Drive and Luddenham Road (Refer Figure 3). As can be seen on the plan, the design responded to the original alignment of the M12 which did not prejudice the site access to Luddenham Road. This concept reduces the need for a controlled intersection at Elizabeth Drive into the site. The spine road concept also facilitates the future redevelopment of the intermediate land on the corner of Elizabeth Drive and Luddenham Road as part of a broader precinct planning process. We believe that this approach provides coordinated planning for such a significant area in the Northern Gateway framed by the M12 corridor, Northern Road, Elizabeth Drive and Luddenham Road.

Figure 4 provides a concept layout for the site. Together with the large format logistics, the proposal recognises and incorporates the opportunity for development along the main road fronting Elizabeth Drive. The concept layout indicates approximately 20,000m² for this purpose which would include compatible uses including hotel and motel accommodation, business premises or light industries positioned to leverage off the Western Sydney Airport in both the construction and operational phases.

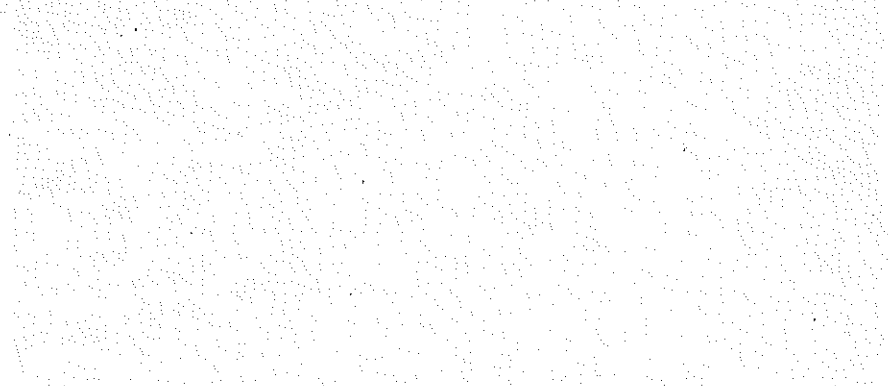
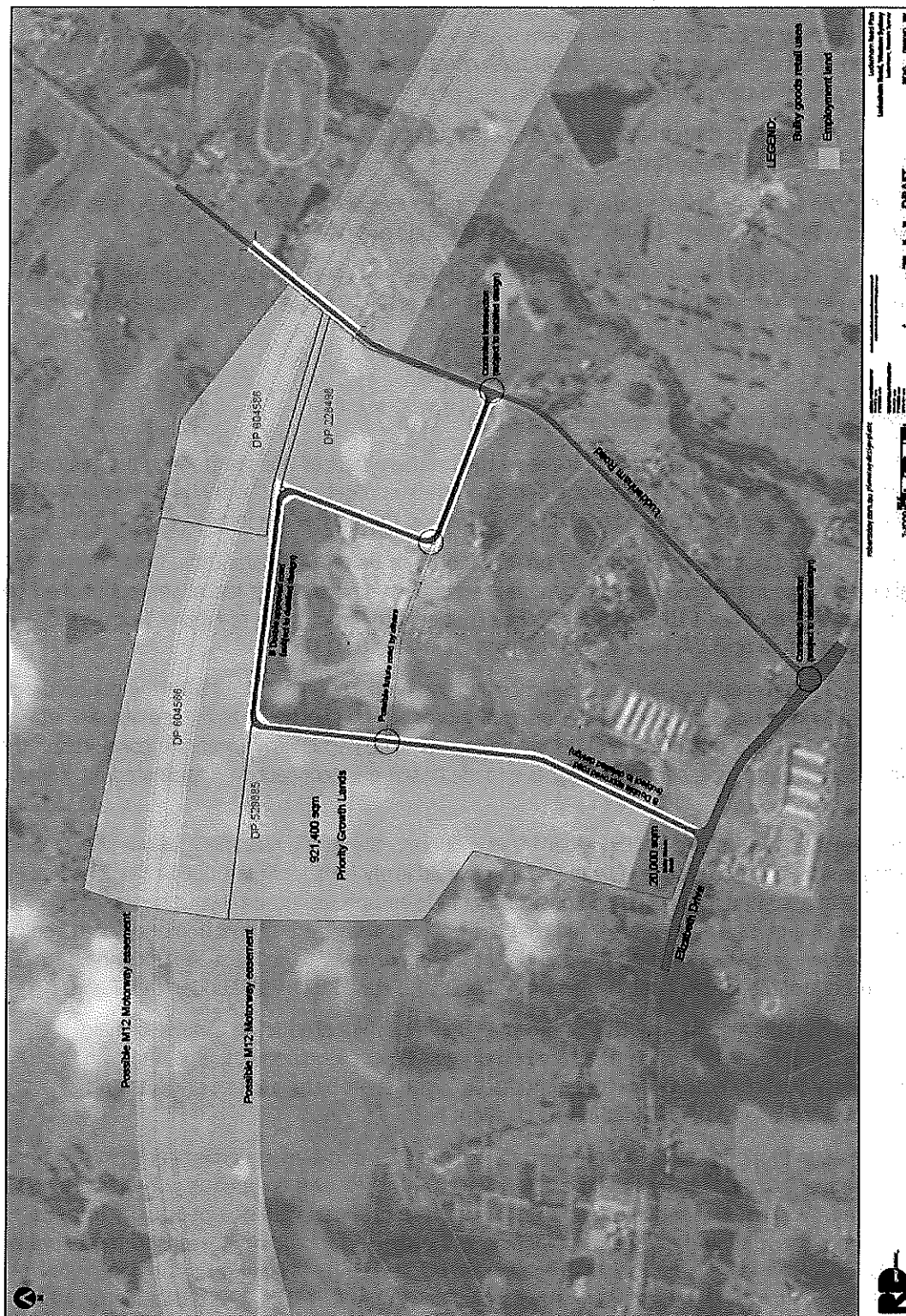


Figure 3 Concept Layout for Elizabeth Drive/Luddenham Road



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Opportunities

Given the ownership pattern, the experience of the Luddenham Property Group in successful development of similar sites across Sydney and ability to achieve a spine access road through the site, work could commence on delivering the site to market immediately. Luddenham Property Group are also finding significant demand for such uses now, in order to plan for and be in operation within a few years.

The proximity of the site to the Western Sydney Airport means it is strategically situated to leverage off the airport development in both construction and operational phases accommodating compatible development.

Preliminary Investigation indicates the site to be unconstrained. It is outside the Immediate riparian corridor of Oaky Creek.

Traffic can be readily managed within the existing network and upgrades to proposed The Northern Road, Elizabeth Drive and Luddenham Road are planned.

There is an opportunity for DPE to review out proposed layout and how critical this site is in relation to the existing road network and proposed M12 corridor and incorporate it into the Concept Plan for Stage 2 of the LUIIP.

Constraints to the Development of the Site

The M12 and M9 preferred routes traverse the northern part of the site framing a significant area (including the site) of unconstrained land stretching between Luddenham Road and The Northern Road and contained by Elizabeth Drive and the new M12 motorway.

We met with Deanne Forrest at RMS on 30 October to better understand the detail of the M12 alignment and in particular whether there is an opportunity to adjust the alignment at the north eastern extent of Lot 1 DP 228498 777-819 Luddenham Road (refer to Figure 4 below) to accommodate a through road within the land controlled to LPG.

Deanne has advised that RMS are commencing the preparation of the EIS for the M12 project on an alignment and preliminary design and relocating the alignment at this point was not possible. This is a significant and disappointing setback, particularly given the consultation that has occurred and representation we have made based on a concept that facilitated a through road.

In relation to access and having regard to the opportunity for development of our site, Deanne advised that any access onto Elizabeth Drive would likely be a let in left out at this location. This is an assumption that we had previously made and hence a road layout traversing a number of lots. She also commented that there would likely be a connection and controlled intersection onto the Northern Road and that the opportunity to connect to Luddenham Road could be facilitated with a minor portion of Lot 2 DP 529885 821-849 Luddenham Road.

Our previous discussion with this land owners have been unproductive and we remain concerned that securing the necessary corridor will be challenging without support and assistance from DPE, RMS or others interested in the short term success of delivering employment land to the market in this location.

Luddenham Property Group acknowledge the difficulties in delivering orderly and economic development of land where multiple land owners with their own competing priorities are involved. While it is essential that all landowners are provided with an opportunity to have input into the front end of land use planning in the precincts, that input needs to be supported by a mechanism to ensure that the road infrastructure can be delivered for the benefit of the wider community. There are lessons from the Growth Centres ILPs where development has stalled because, while the layout support the economic growth, there are no specific

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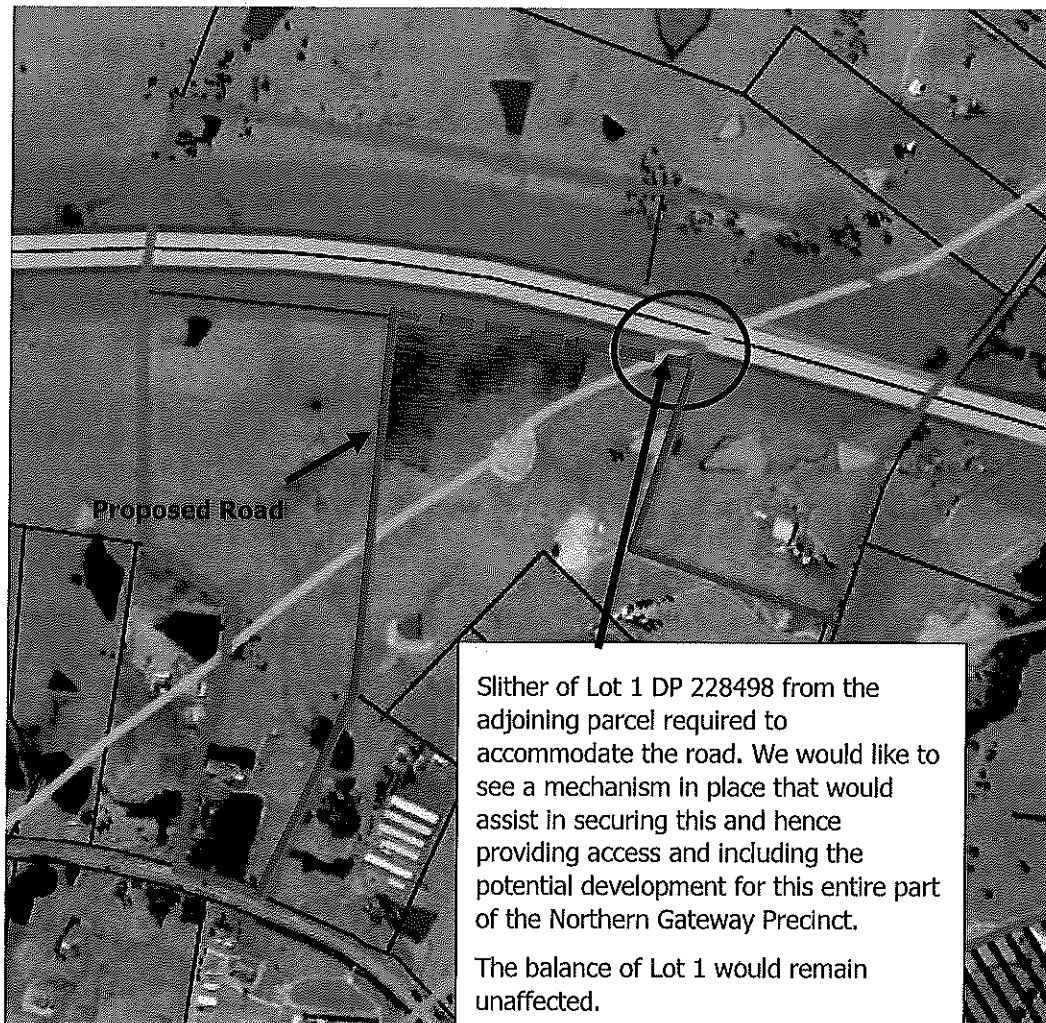
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mechanisms in place if individual land owners remain obstinate. It is therefore important that DPE do commit to working with landowners in delivering the initial precincts as stated in the LUIIP (page 25) and that this liaison is more than tokenistic and delivers actual outcomes.

Figure 4 Land Compromised by M12 Alignment



Other matters

The LUIIP refers to the importance of sequencing of land use and infrastructure, however, provide no real understanding of how this will be approach other than the simple identification of the initial precincts.

The LUIIP identifies land uses on the Structure Plan (page 19) however, fails to adequately define what is meant by the land use terms used. For example, how would *Flexible Employment* be defined? Is it retail, industrial, commercial or a mixture of all three? Does it preclude residential development? Similarly, *Mixed Flexible Employment and Urban Land*?

We would suggest that the next stage Structure Plans must include trunk infrastructure corridors, arterial and major local roads. They should be developed having considered the current opportunities that exist for development that can be identified by more targeted discussion with key stakeholders and landowners. The Structure Plan should include actions for delivery and an innovative and practical approach to negotiating with land owners who are custodians of land required for connectivity and other infrastructure. The plan needs to recognise the challenges of fragmentation and provide solutions, procedures or guidelines that force reluctant land owners to relinquish portions of land required.



DPE cannot rely on the market to implement desktop urban design outcomes in Structure and Precinct Plans.

The document references the "digital design process" as a tool for the development of the detailed Structure Plan and Precinct Plan. Further, clarification is required in terms of what this means.

The Northern Gateway will support the Western Economic Corridor and reference is made to a Central Employment Hub (page 24) in a context that suggests that the location of this has already been determined proximate to the Sydney Science Park yet it doesn't appear in the Structure Plan.

Luddenham Property Group have been involved in the GSC Aerotropolis Forum over the past 18 months as a key landowner and we were therefore surprised at the lack of detail in the LUIIP in relation to the mechanisms for funding and delivery of infrastructure necessary to stimulate development. We consider this a missed opportunity to address a significant strategic issue.

Conclusion

The subject parcels represent a significant proportion of the land in the Northern Gateway Precinct bound by the M12, Elizabeth Drive and Luddenham Road. We suggest that this part of the precinct is well located to deliver employment lands in the short term. The LUIIP puts continued emphasis on the critical importance of working collaboratively across all levels of government, industry to ensure the delivery of the vision for the Aerotropolis is delivered.

The LUIIP purports to represent a new approach in strategic and land use planning and while it is a useful first step provides little in the way of strategic planning beyond identification of initial precincts and reaffirming road infrastructure commitments. In moving forward, additional innovation in process is needed to ensure that the plan can be implemented and doesn't inadvertently stifle those ready to realise the potential of the area. DPE have a role in ensuring that any concept plans developed under the LUIIP can be readily implemented and that mechanisms are in place to do this.

Luddenham Property Group would like to work with DPE and local Council's in developing the Precinct Plan particular as it relates to that part of the Northern Gateway south of the M12. Further, any advocacy or assistance that DPE can provide in securing an access corridor alongside the M12 in further negotiation with RMS would be welcome. Thank you again for the opportunity to comment on this important strategic document.

Yours sincerely

Vas Andrews
Senior Project Manager