

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 26 February 2020 2:41 PM  
**To:** [REDACTED]  
**Subject:** FW: Webform submission from: Western Sydney Aerotropolis Planning Package

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**From:** [REDACTED] **On Behalf Of** DPE PS ePlanning Exhibitions Mailbox  
**Sent:** Tuesday, 25 February 2020 7:14 AM  
**To:** [REDACTED]  
**Subject:** FW: Webform submission from: Western Sydney Aerotropolis Planning Package

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**From:** [noreply@feedback.planningportal.nsw.gov.au](mailto:noreply@feedback.planningportal.nsw.gov.au) <[noreply@feedback.planningportal.nsw.gov.au](mailto:noreply@feedback.planningportal.nsw.gov.au)>  
**Sent:** Monday, 24 February 2020 8:32 PM  
**To:** DPE PS ePlanning Exhibitions Mailbox <[eplanning.exhibitions@planning.nsw.gov.au](mailto:eplanning.exhibitions@planning.nsw.gov.au)>  
**Subject:** Webform submission from: Western Sydney Aerotropolis Planning Package

Submitted on Mon, 24/02/2020 - 20:18  
Submitted by: Anonymous  
Submitted values are:  
Submission Type:I am making a personal submission  
First Name: Louise  
Last Name: Sedgwick  
Name Withheld: No  
Email: [REDACTED]  
Suburb/Town & Postcode: [REDACTED]  
Submission file:  
[20-feb---final-submission---642-luddenham-road-luddenham.pdf](#)

Submission: Please find attached the Planning Submission in relation to 642 Luddenham Road, Luddenham.  
Submitted on behalf of Louis Borg, [REDACTED] - [REDACTED] Victoria Borg, our [REDACTED]  
[REDACTED]. Louis and Victoria are joint owners of the this property.  
[REDACTED]

URL: <https://pp.planningportal.nsw.gov.au/draftplans/exhibition/western-sydney-aerotropolis-planning-package>

[REDACTED]

# PLANNING SUBMISSION

[REDACTED],  
LUDDENHAM

21 FEBRUARY 2020



## QUALITY ASSURANCE

**PROJECT:** Submission: Western Sydney Aerotropolis

**ADDRESS:** [REDACTED] Luddenham

**COUNCIL:** Penrith City

**AUTHOR:** Think Planners Pty Ltd

Date	Purpose of Issue	Rev	Reviewed	Authorised
18 February 2020	Draft Issue for client comment	Draft	LK	SF
21 February 2020	Submission	Final	LK	SF

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## PURPOSE

This submission is prepared by Think Planners Pty Ltd on behalf of the Borg Family, in response to the December 2019 publication of the Draft Western Sydney Aerotropolis Plan, Western Sydney Aerotropolis Discussion Paper on the proposed State Environmental Planning Policy and the draft Western Sydney Aerotropolis Development Control Plan Phase 1 by the NSW Department of Planning and Infrastructure.

The Borg Family own land which is identified as [REDACTED] which is more commonly known as [REDACTED], Luddenham.

The site is situated within an existing rural area, the subject land parcel can be best described as an irregular shaped allotment which is located on the north eastern side of Luddenham Road. The subject land parcel is approximately 128.89 hectares in total area and gains access from Luddenham Road. The site's western boundary is generally formed by Cosgroves Creek with Twin Creeks located to the site's north east and predominantly rural land surrounding the site to the south and east. The Western Sydney Airport (WSA) is currently under construction and is located to the south west of this site.

The subject site is presently zoned RU2 Rural Landscape and E2 Environmental Conservation under the Penrith Local Environmental Plan (LEP) 2010. The site is subject to a minimum lot size of 40 Hectares under Penrith LEP 2010.

The subject site is located within the Northern Gateway as identified in the Structure Plan, which will be a major airport interface, serving as a key strategic centre within the Western Economic Corridor. The Northern Gateway is to link the Airport with the Western Parkland City Metropolitan Cluster through high frequency public transport, freight, road and rail connections.

The site itself, was previously assigned for rail and motorway (North South Railway Link - Stage 1) to pass through the property with the remaining land zoned for Flexible Employment and Non-Urban Land under the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan - August 2018. In December 2019, the property zoning was changed to Environment and Recreation.

The family have owned the land parcel for over 40 years. This property is currently used for cattle grazing, which is the main source of family income. The proposed new zoning which is for Environment and Recreation will significantly affect the property owners and will also serve to limit any future potential development opportunities.

The draft Western Sydney Aerotropolis Plan 2019 is generally supported, as it provides opportunity, vision and guidance to landowners and the investment community in

relation to the structure and roll out of the WSA. The draft Western Sydney Aerotropolis Plan 2019 is a positive step forward in the evolution of an overall concept and related planning controls.

However, the subject site was previously identified as having potential, mainly due to its locational characteristics, to offer an important contribution to flexible employment land. This opportunity has been removed in the current version of the draft Western Sydney Aerotropolis Plan 2019 as the land is now fully identified for Environment and Recreation purposes.

The land owner seeks to work collaboratively with the NSW Government to return the land to permit flexible employment as the site is inherently located in a prime position to provide supportive flexible employment land to service the Northern Gateway Precinct.



## SITE AND CONTEXT

### LEGAL DESCRIPTION

The subject site is legally described as [REDACTED], though more commonly known as [REDACTED], Luddenham.

### LOCATION

Situated within the existing rural area, the subject land parcel can be best described as an irregular shaped allotment with a total site area of 128.89 hectares which is located on the north eastern side of Luddenham Road. The site is bound by Cosgroves Creek to the west and Twin Creeks to the north east.

An aerial photograph and photograph of the subject site is provided below which shows the site in its current context.

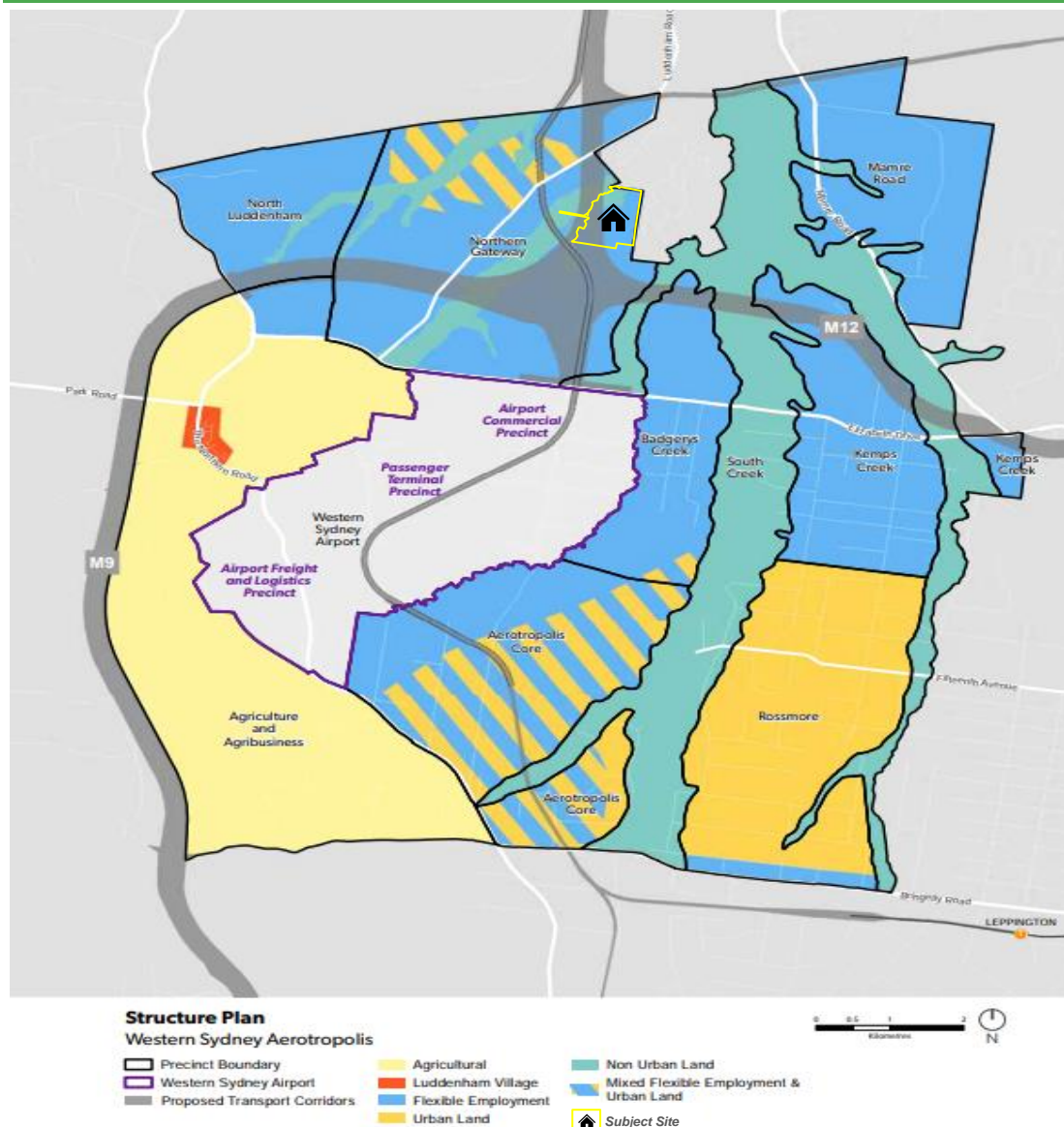
**Figure 1: Aerial Map Extract of the Subject Site (Source: Six Maps 2019)**



## WESTERN SYDNEY AEROTROPOLIS LAND USE AND INFRASTRUCTURE IMPLEMENTATION PLAN - AUGUST 2018

In August 2018, the initial precinct plan (Stage 1) the site itself, was previously assigned for rail and motorway (North South Railway Link- Stage 1) to pass through the property with the remaining land zoned for Flexible Employment and Non-Urban Land under Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan Stage 1: Initial Precincts. This is demonstrated in the extract provided below

**Figure 2: Western Sydney Aerotropolis Structure Plan (Source: WSA August 2018)**

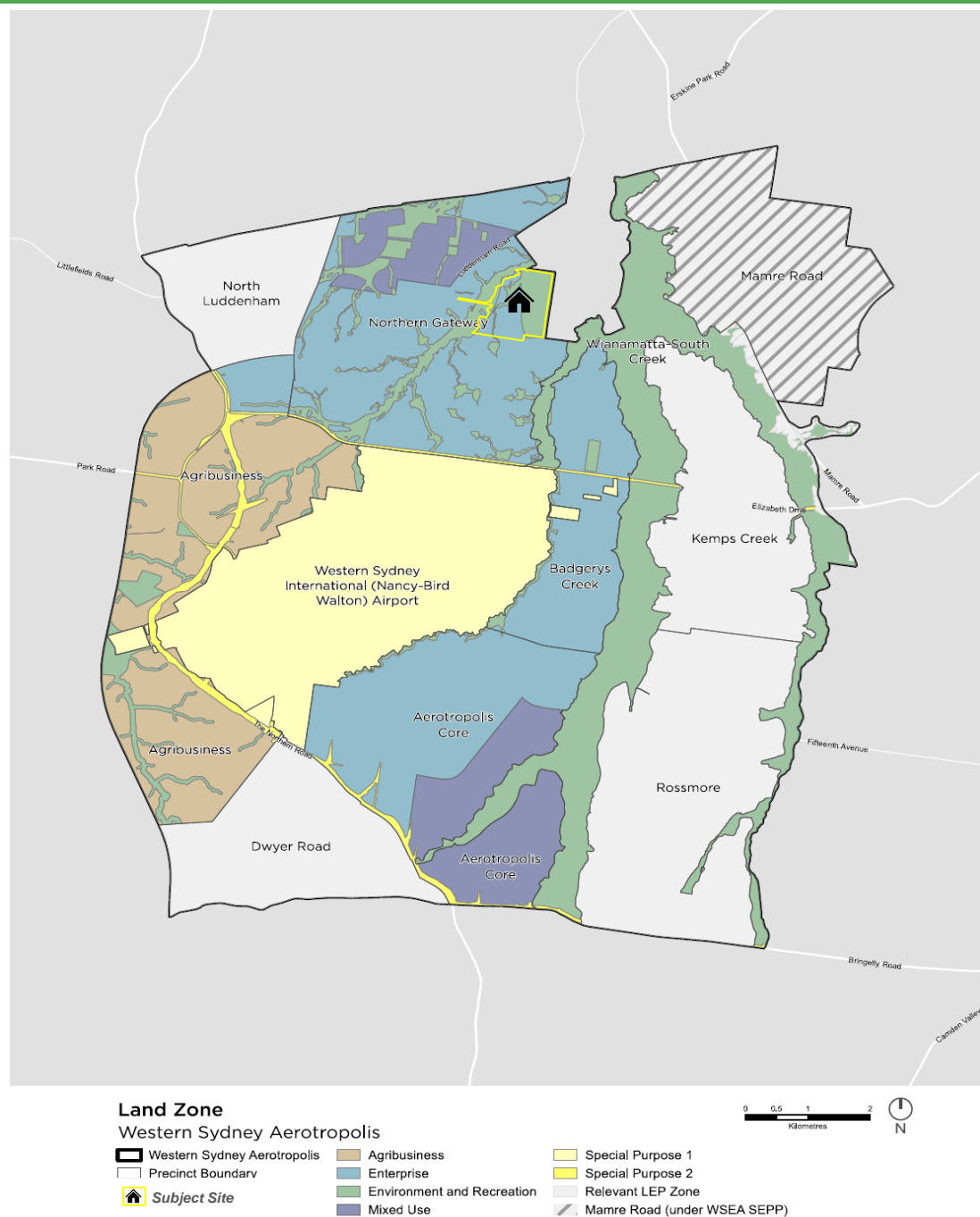




## WESTERN SYDNEY AEROTROPOLIS PLAN – DECEMBER 2019 (DRAFT FOR PUBLIC COMMENT)

The Western Sydney Aerotropolis Plan December 2019 (Draft for Public Comment) has updated the property zoning which has changed to Environment and Recreation, This is demonstrated via extract overleaf.

**Figure 3: Land Zone Map (Source: WSA December 2019)**

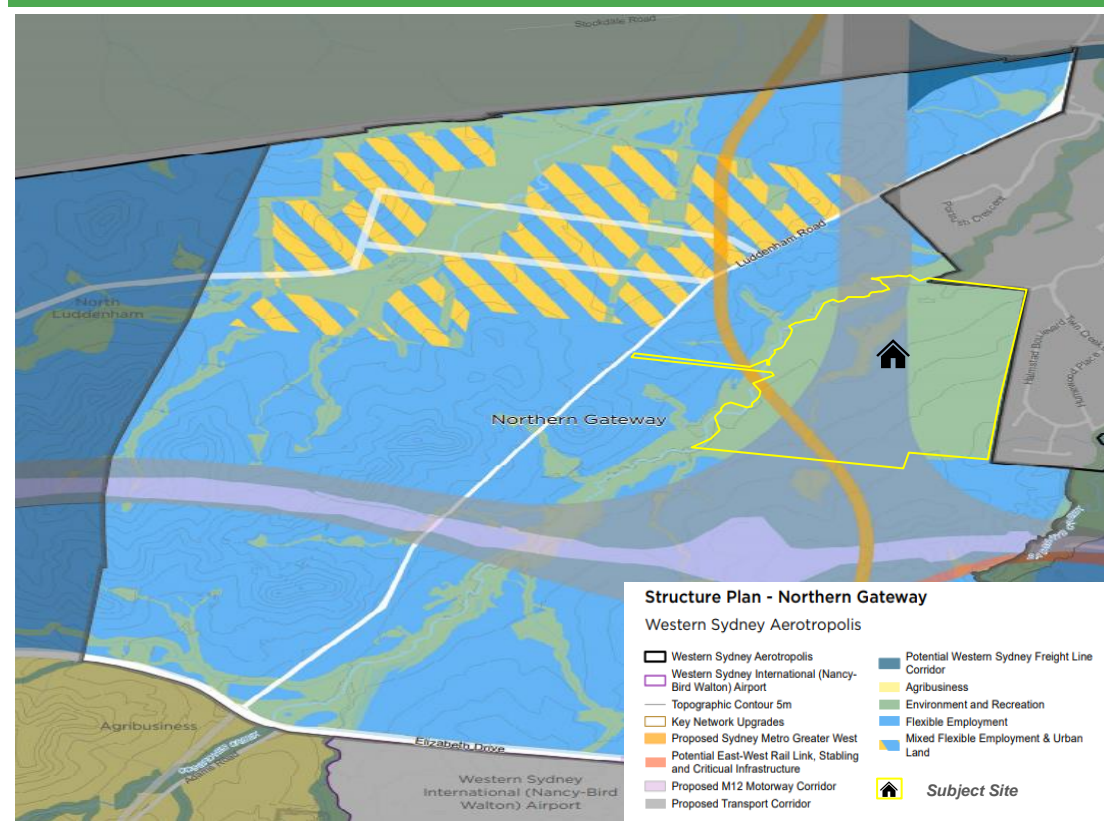


## NORTHERN GATEWAY

The Northern Gateway Precinct (as identified in the Western Sydney Aerotropolis Plan 2019) is proposed to facilitate the delivery of emerging economic opportunities which are catalysed by the Airport. This Precinct is highlighted to build on the approved Sydney Science Park development to provide a variety of employment generating uses.

The extract from the Western Sydney Aerotropolis Plan provide below demonstrates the zones within the Northern Gateway and how the subject land parcel assigned for rail and motorway (Railway Link-) to pass through the property with the remaining land zoned for Environment and Recreation.

**Figure 4: Northern Gateway Structure Plan Update (Source: WSAP December 2019)**

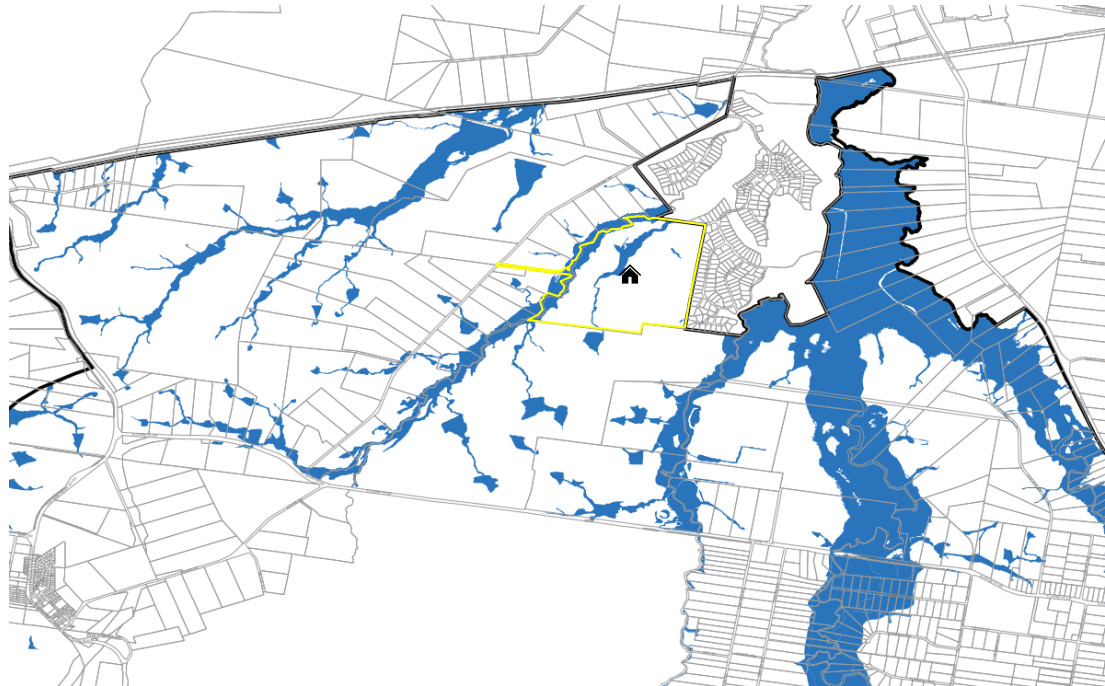


This zone will be applied to land identified for conservation and blue-green corridors. This includes those areas located within the 1 in 100 chance per year flood area. By preserving areas for recreation and relaxation, this zone will be vital to the Western Parkland City's liveability.

## FLOOD PRONE LAND

The subject site is partly identified as being flood prone land as demonstrated via extract provided below

**Figure 5: Flood Map (Source: DRAFT SEPP (Western Sydney Aerotropolis) 2019)**



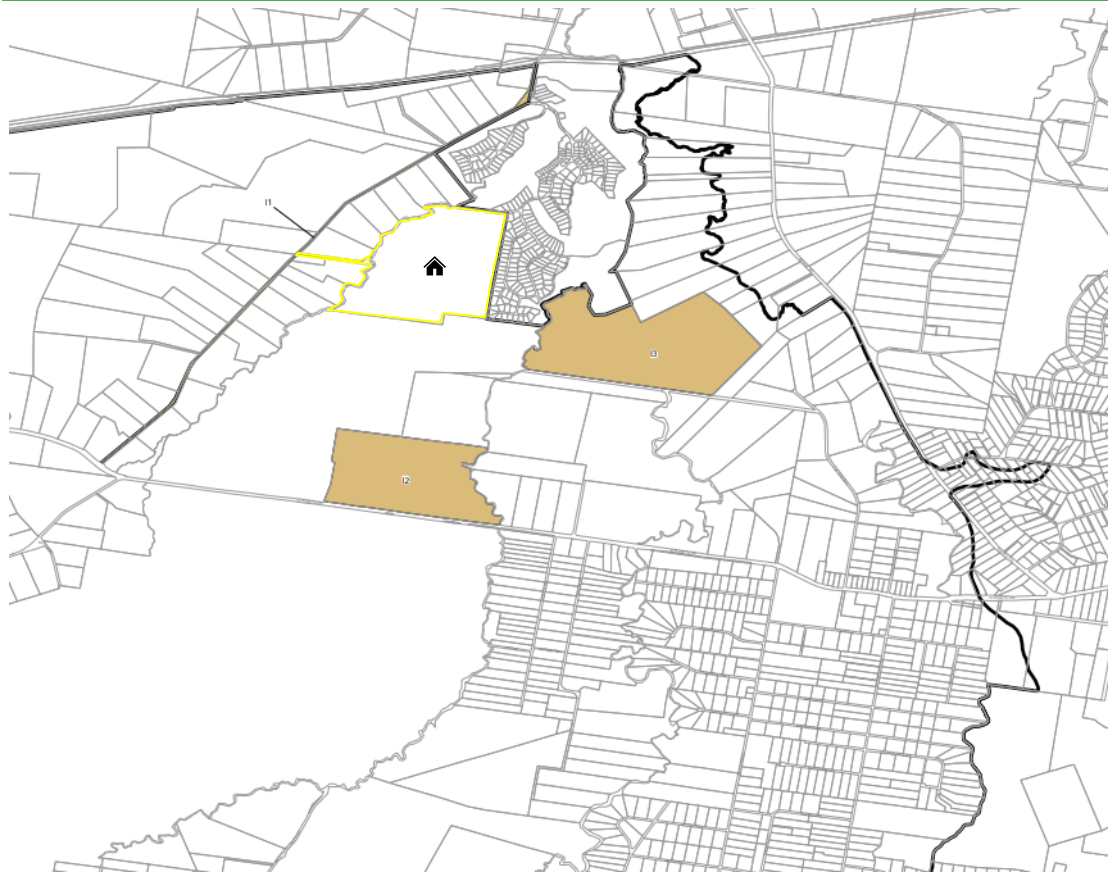
 Subject Site

As a result, a very small portion of the subject site is identified as in 100 year Flood Area.

## HERITAGE

The subject site is not identified as a heritage item, it is not located within a heritage conservation area. However, there are heritage items within vicinity of the development site as illustrated by the heritage extract map below.

**Figure 6: Heritage Map (Source: DRAFT SEPP (Western Sydney Aerotropolis) 2019**



 Subject Site

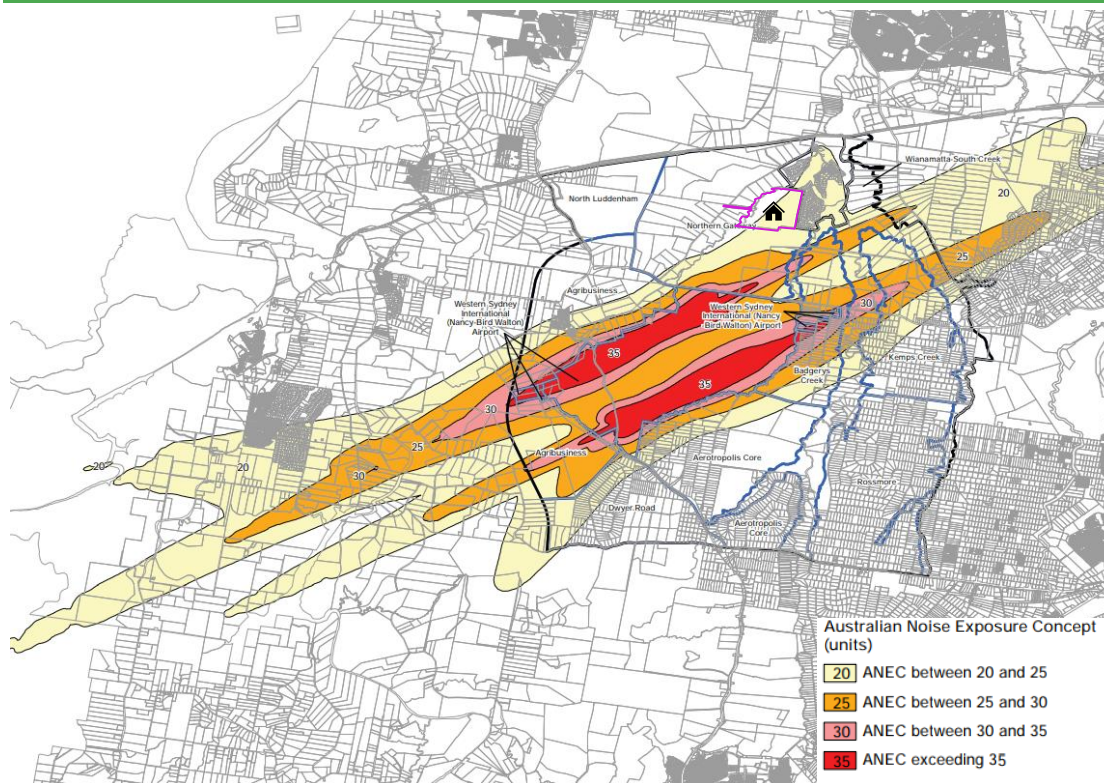
As a result, the subject site will not have any associated heritage restrictions given the physical separation to nearby heritage items.



## AUSTRALIAN NOISE EXPOSURE CONCEPT

The subject site is identified as having ANEC between 20 and 25 as illustrated by the ANEC map below.

**Figure 7: ANEC Map (Source: DRAFT SEPP (Western Sydney Aerotropolis) 2019)**



 Subject Site

According to the Western Sydney Aerotropolis Plan (December 2019), Australian Noise Exposure Concept (ANEC) can be best described as the following:

- “Anticipated forecasts of future noise exposure patterns based on indicative flight paths around an airport that constitute the contours.”

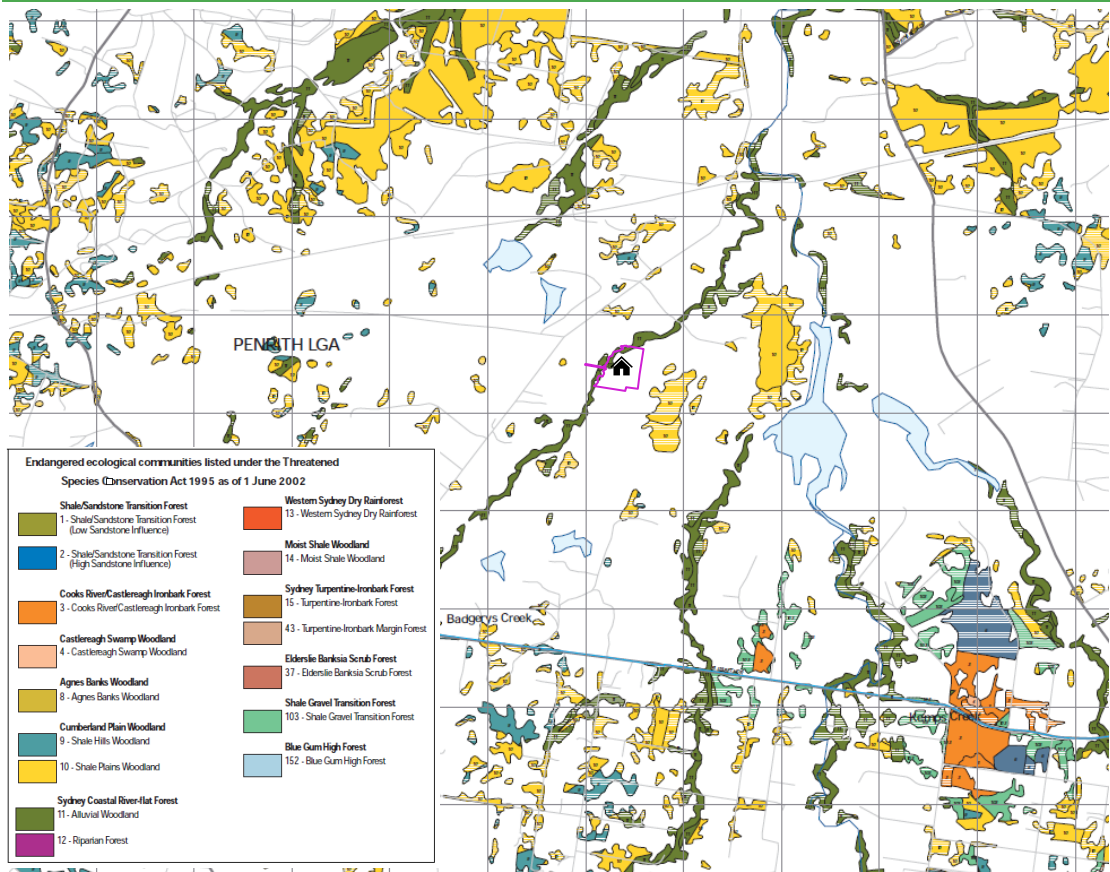
Largely the site is located in the 20 ANEC contour which can be made suitable for residential development. There is no impediment for the site to be zoned for future flexible employment uses.



NATIVE VEGETATION OF THE CUMBERLAND PLAIN

The subject site is not identified as containing significant vegetation, as demonstrated via map extract below. There is notably some vegetation located along the corridor that follows Cosgroves Creek.

Figure 8: Native Vegetation of the Cumberland Plain (Source: NSW National Parks and wildlife services)



 Subject Site

## SUBMISSION: WESTERN SYDNEY AEROTROPOLIS PLAN

The following key comments are made on behalf of the Borg Family:

- **Employment land supply.** The subject site offers the opportunity to allow additional land to be zoned Flexible Employment to realise the vision for the Northern Gateway and to provide much needed jobs for Western Sydney.
- **Absence of significant environmental constraints.** It is recognised that the subject site is constrained by flooding and existing vegetation, as identified in this report. However, the subject site has been historically cleared and degraded through agricultural land uses including cattle grazing. As a result, there remains capacity across 128.89 hectares of land to allow for future Flexible Employment zoning.
- **Building on the vision for the Northern Gateway.** Allowing the subject site to be zoned Flexible Employment will bring additional and complementary employment floor space which will build a strong economic foundation for the Northern Gateway. This will assist with growing a stronger Northern Gateway by growing investment, business opportunities and jobs in this strategic location.
- **Economic viability.** Permitting the subject site to be developed for Flexible Employment will improve the economic viability and functional delivery of the Precinct as more land can be developed to provide for much needed jobs in Western Sydney.
- **Opportunity for catalytic development.** The Western Sydney Aerotropolis Plan should capitalise on large landowner willingness and also the large amalgamated land parcels to facilitate catalytic development to take place. This is important as the subject site remains in single ownership and is prime for redevelopment.
- **Locational characteristics.** The site is located very close to where there is a junction between the north/south and east/west transport corridors. As the site is located near this junction the land will be prime land located nearby a potential future station or interchange in this location. The land that is within close proximity of a future junction should be efficiently used and nominated for flexible employment uses.

The opportunity exists for the subject site to be nominated as Flexible Employment land. The land is well located being at the northern entry to the Aerotropolis Core and is prime land ready for redevelopment as such there is no impediment to allowing the land to be developed for Flexible Employment.

## CONCLUSIONS

This submission on behalf of the Borg Family strongly advocates for the subject site to be considered for the proposed zoning to be Flexible Employment to support the vision for the Northern Gateway.

This submission is intended to assist the NSW Government in finalising the Western Sydney Aerotropolis Plan 2019 and positively contributing to the success of the Aerotropolis and WSA.

Principally, this submission makes the following key points:

- The reallocation for Flexible Employment zoning of the land holding located at 642 Luddenham Road Luddenham.
- There is no obvious impediment of the subject site to be zoned Flexible Employment.
- The reallocation of Flexible Employment zone to the subject site offers the opportunity to build upon the strength of the Northern Gateway ensuring it has a sustainable and prosperous future which will drive both the delivery of jobs and economic investment in the area.

The Borg Family look forward to continuing to work with the NSW Department of Planning and Infrastructure on further refinements of the Western Sydney Aerotropolis Plan 2019.