

24 February 2020

Western Sydney Planning Partnership  
PO Box 257  
Paramatta NSW 2124

Dear Sir/Madam

**Draft Western Sydney Aerotropolis Plan and Aerotropolis Draft State Environmental Planning Policy (Our Ref. 18-047)**

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Knight Frank Town Planning has been engaged by the Kennett family to prepare this submission on the *Draft Western Sydney Aerotropolis Plan* (Draft Aerotropolis Plan) and the *Aerotropolis draft State Environmental Planning Policy* (Draft SEPP). On behalf of our client, we thank you for the opportunity to comment.

Our client owns a large parcel of land of approximately [REDACTED] off the Luddenham Road. Our client are long term land holders who have owned and invested in the rural use of the land for 60 years. These landholdings are located at [REDACTED] (refer to existing *land ownership map* in submission at Appendix 1. Refer to Tottenham Developments Pty Ltd). The majority of our client's landholding is located within the designated *Northern Gateway* precinct. We note the *Northern Gateway* precinct has been identified as one of the 'Initial Precincts' for development in the Aerotropolis.

This submission should be read in conjunction with the accompanying plans prepared by PAA Design – see Appendix 1. For context, those plans are an initial review of our client's land in relation to the adjoining properties and alternate options for the transport corridors.

We note the Draft Aerotropolis Plan *Northern Gateway* structure plan identifies our client's land as *flexible employment*. We note however also by reference to Section 3.2.1 of the Draft Aerotropolis Plan that our client's land is identified as *Enterprise Zone*. *Enterprise Zone* is described as land *where enterprise uses are supported while mitigating impacts of airport operations. Residential development and other noise sensitive uses not permitted*. By reference to the Draft SEPP, we note the proposed land use zoning table for the *Enterprise Zone* provides for principally employment and commercial uses. Residential will be a prohibited use.

We note also that the *Northern Gateway* structure plan confirms that our client's land continues to be significantly impacted on by the proposed Sydney Metro Greater West (Metro Line) and the proposed transport corridor for the Outer Sydney Orbital and the *potential Western Sydney freight line corridor*.

In noting the above land use zoning and infrastructure corridor aspects of the Draft Aerotropolis Plan and the Draft SEPP, we wish to raise the following major concerns and objections.

**Infrastructure corridor**

The Draft Northern Precinct structure plan fails to acknowledge the impact on 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 Northern Precinct is as directly adversely affected by the proposed transport corridors. This is a significant impost on the development potential of the property.

We note that the alignment of the Sydney Metro Greater West as it crosses our client's land appears to be the result of accommodating a Metro rail station within the Sydney Science Park. Doing so will have a direct poor planning and economic impact on our client's land. This is not a reasonable or satisfactory outcome.

As a result of the current alignment of the Metro Line, the majority of our clients land in practice will be directly influenced and impacted on by the combined infrastructure corridor of the Metro Line, the Outer Sydney Orbital and the Freight Line. The result will be 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.

We note that the Draft Aerotropolis Plan suggests that following landowner and community input, *a final transport network will be determined through precinct planning, based on detailed investigations and analysis that focus on integrating land use and transport.*

Accordingly, we strongly request that any decision on the alignment of the Metro line and more generally on the infrastructure corridor only be made following both further detailed consultations with our clients and the Sydney Science Park and on the basis of joint structure planning across both land holdings.

## Land use zoning and future uses

Any decision on the future use and therefore zoning of our client's land should take into account the immediately adjoining established and approved uses in the locality. This appears not to have been done. We

note that the Sydney Science Park to the immediate south is proposed to be zoned *Mixed Use*. In accordance with the Draft SEPP, *Mixed Use* zoning is to provide for mixed flexible employment and residential uses. Master planning for the Sydney Science Park locates housing immediately adjacent to our client's land. The result will be unnecessary land use conflict between future residents and many of the employment uses anticipated by the proposed Enterprise zoning of our client's land. In practice this will burden our client's property and limit its economic use. This will be completely inconsistent with the objectives and purpose of the *Enterprise* zone.

To the immediate east on Luddenham Road is the Twin Creeks housing estate. Zoned E4 Environmental Living under the Penrith LEP 2010, Twin Creeks is an established housing estate in a park land setting with a high level of residential amenity. Similar to the Sydney Science Park, the proximity of Twin Creeks to our client's land will result in unnecessary land use conflict and again limit the use of our client's land for the uses anticipated by the *Enterprise* zone.

In considering the above, we suggest that the *Enterprise* Zone is not appropriate. It is our suggestion that the appropriate zoning response is *Mixed Use*. In support, we would suggest that our client's land holding in this locality between the Sydney Science Park and the Warragamba pipeline is unlike the remainder of the Northern Gateway and should not be treated in the same manner. To that end, we note the general comment in the draft Aerotropolis Plan that *the Northern Gateway will be a major airport interface, serving as a key strategic centre within the Western Economic Corridor – linking the Airport with the Western Parkland City Metropolitan Cluster through high frequency public transport, freight, road and rail connections.*

It is our view that this description and role of the Northern Gateway does not apply to our client's lands holding.

In recommending a *Mixed Use* zone, we note the following features of our client's land:

- A large landholding capable of supporting a mixed use development (80 hectares)
- Adjacent to the existing residential development (Twin Creeks)
- Mostly unconstrained by South Creek flooding
- Outside the noise zone (ANEC/ANEF 20) and therefore suitable for residential development
- By being adjacent to the mixed use Science Park precinct, the following is noted;
  - Confirms the suitability of this location for mixed use development
  - Sensible and geographical extension of the Science Park precinct
  - Walking distance to the proposed new Science Park town centre and railway station, including part of the site within the 800m walkable catchment
  - 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. We note that this aligns with the State Government *Future Transport 2056* which in summary states .. *“as service frequencies and travel times are improved, there is a need for councils to consider local conditions through place based planning that provides for centres around interchanges to grow and evolve over time”* (GSC, *Western City District Plan*, pg. 51)

In summary and on behalf of our client, we wish to restate our concern and objection to the proposed *Enterprise* zoning of their land and the current alignment of the Sydney Metro Greater West. Accordingly, we recommend:

1. Our client's land be zoned *Mixed Use* with the detailed planning subject to the precinct planning to be undertaken by the Planning Partnerships.
2. That the detailed precinct planning identify an alternate route for the Metro Line and a route for all the transport infrastructure that minimises the impact on the orderly and economic use of our client's land and:
3. That the detailed precinct plan address both our client's land and the Sydney Science Park to ensure a coordinated approach to the development and servicing of the overall locality.

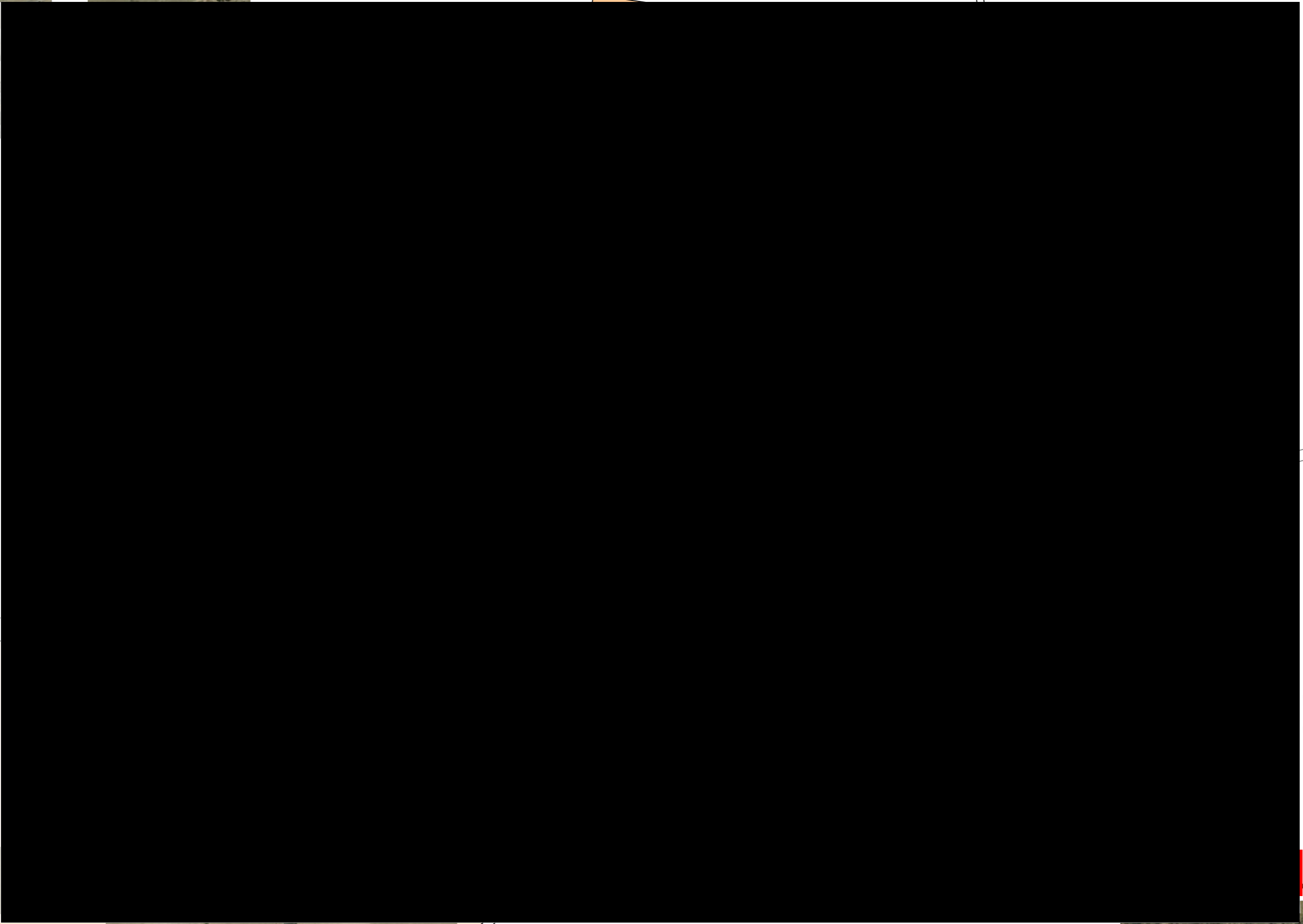
Thank you for the opportunity to comment and look forward to your response. In the meanwhile, I maybe contacted on [REDACTED]

[REDACTED]

Yours sincerely  
Mark Grayson  
Director, Knight Frank Town Planning

## **Appendix 1 – Concept Plans (PAA Design)**

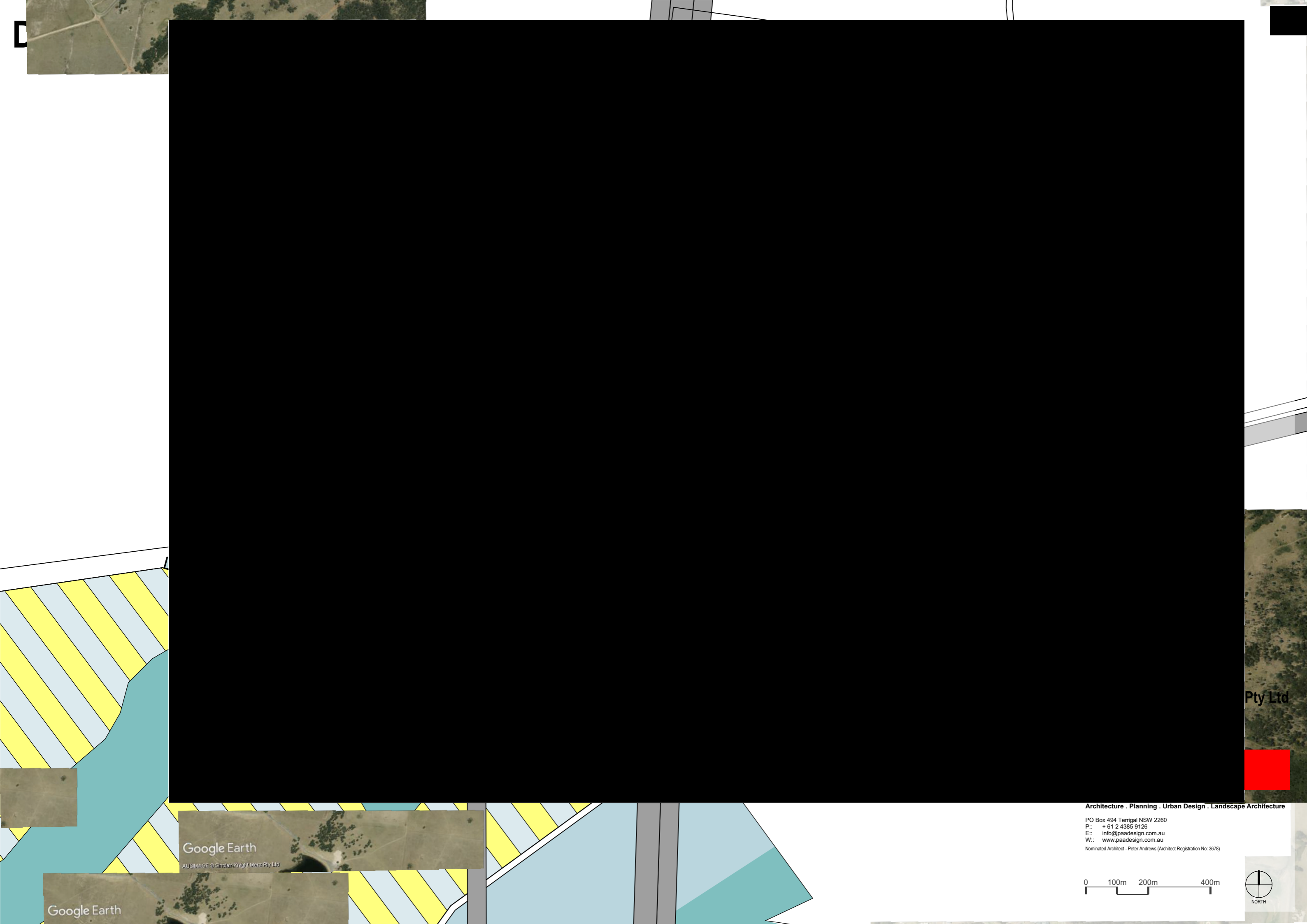
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Nominated Architect - Peter Andrews (Architect Registration No. 3678)

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Google Earth

AUSIMAGE © Sindian Knight Merz Pty Ltd

Google Earth

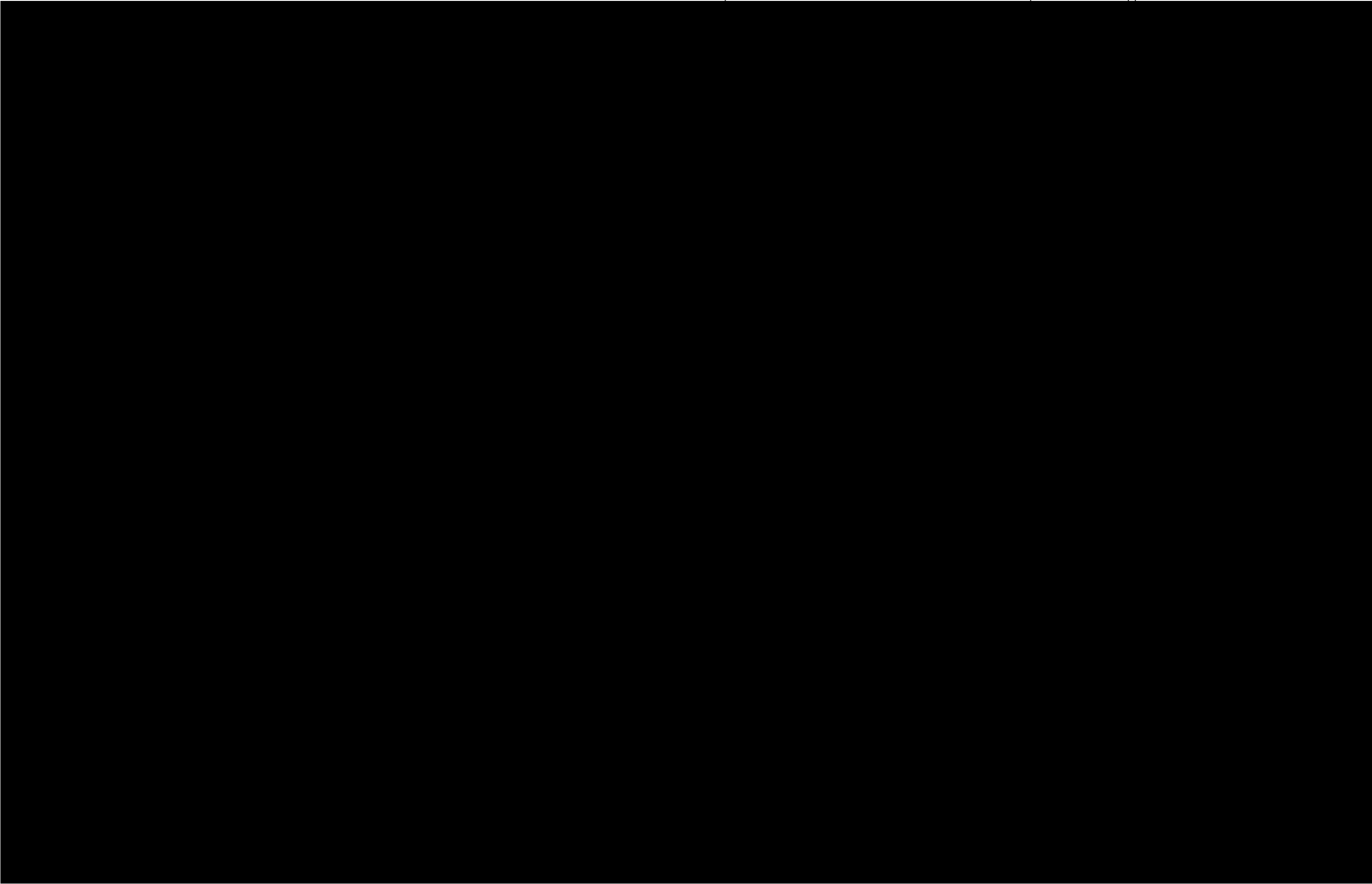
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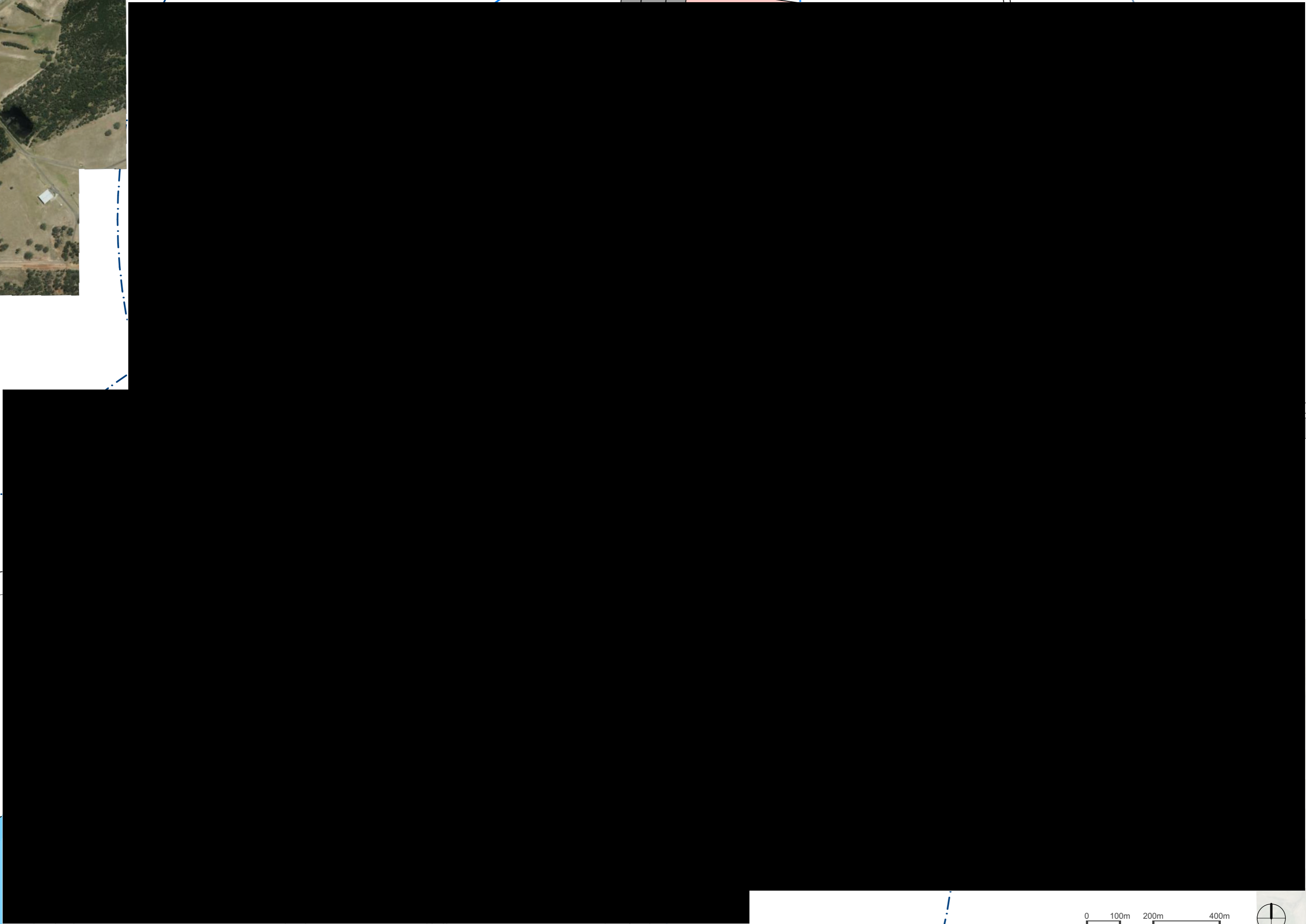
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443 Luddenham Road, Luddenham

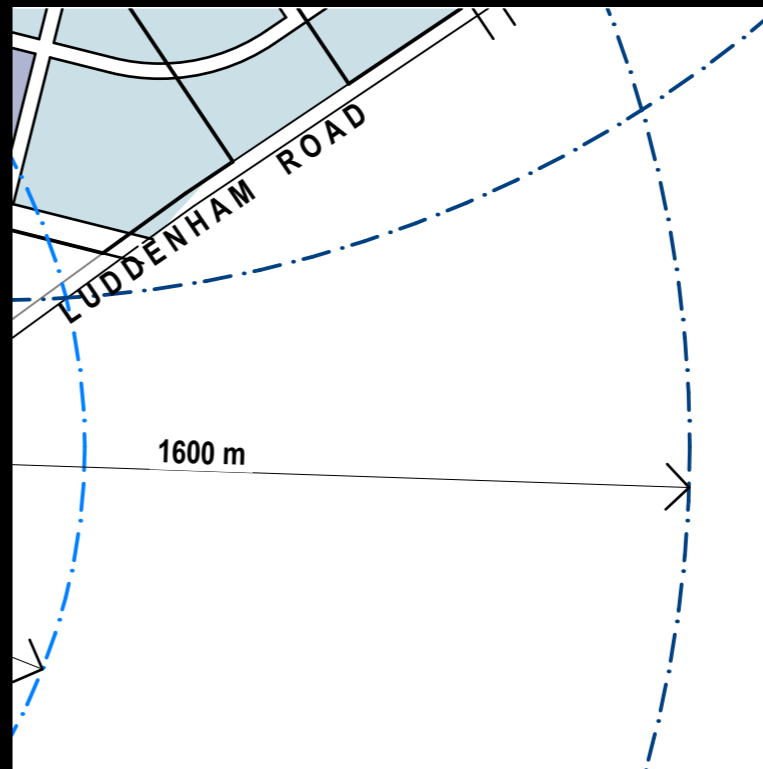


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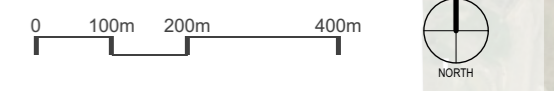




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