

24th February 2020

[REDACTED]
Subject Property: [REDACTED], Luddenham NSW 2745 ([REDACTED])

Contact: [REDACTED]
[REDACTED]
[REDACTED]

Department of Planning, Industry and Environment,
GPO Box 39

Sydney NSW 2000

Via: DPIE Submissions Portal

SUBMISSION TO THE EXHIBITION OF THE DRAFT STAGE TWO WESTERN SYDNEY AEROTROPOLIS PLAN

Please accept this submission in relation to the above property, and the proposed changes (outlined in the 3 documents listed below) that significantly impact the above mentioned property (and illustrated below) and the livelihood of the resident family.

- Draft Western Sydney Aerotropolis Plan (Draft WSAP)
- Western Sydney Aerotropolis Discussion Paper on the proposed State Environmental Planning Policy (SEPP Discussion Paper)
- Draft Western Sydney Aerotropolis Development Control Plan Phase 1 (Draft DCP)

The documents above propose that our property be zoned as Environment and Recreation in the Western Sydney Aerotropolis State Environmental Planning Policy. The documents also indicate that property should be investigated for its potential to function as a Regional Parkland.

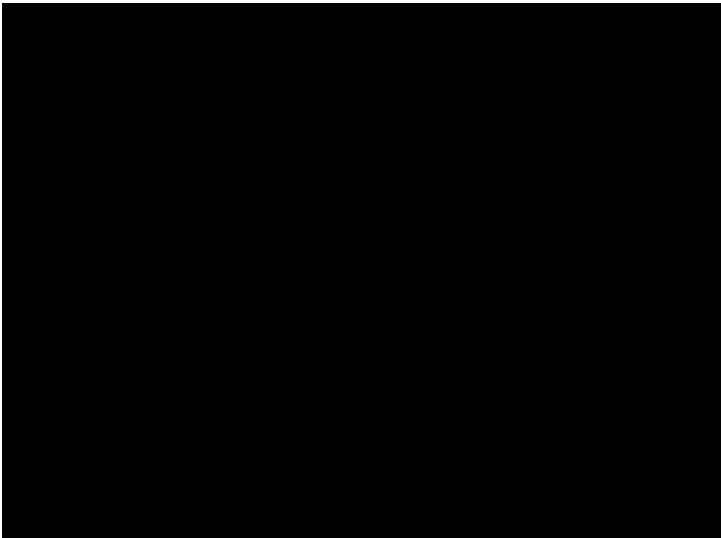
We submit that the zoning of the land as Environment and Recreation is inappropriate and that the land should be included in the Agribusiness Zoning,

We support and endorse Stage 2 LUIIP Documents for public comment, and making the Agribusiness a priority precinct. **However as stated above we strongly disagree with the proposed Environment and Recreation zone that will impact our property** (Illustrated on the next page).

This zoning also affects two neighboring properties ([REDACTED]), and the land on the western side of [REDACTED]

This submission outlines the reasons why our family, along with industry experts believe this is the sensible outcome for the Aerotropolis and Agribusiness precinct. The reasons outlined below would also apply to neighboring properties outlined above.

Landholding identification - [REDACTED], Luddenham NSW 2745 [REDACTED])

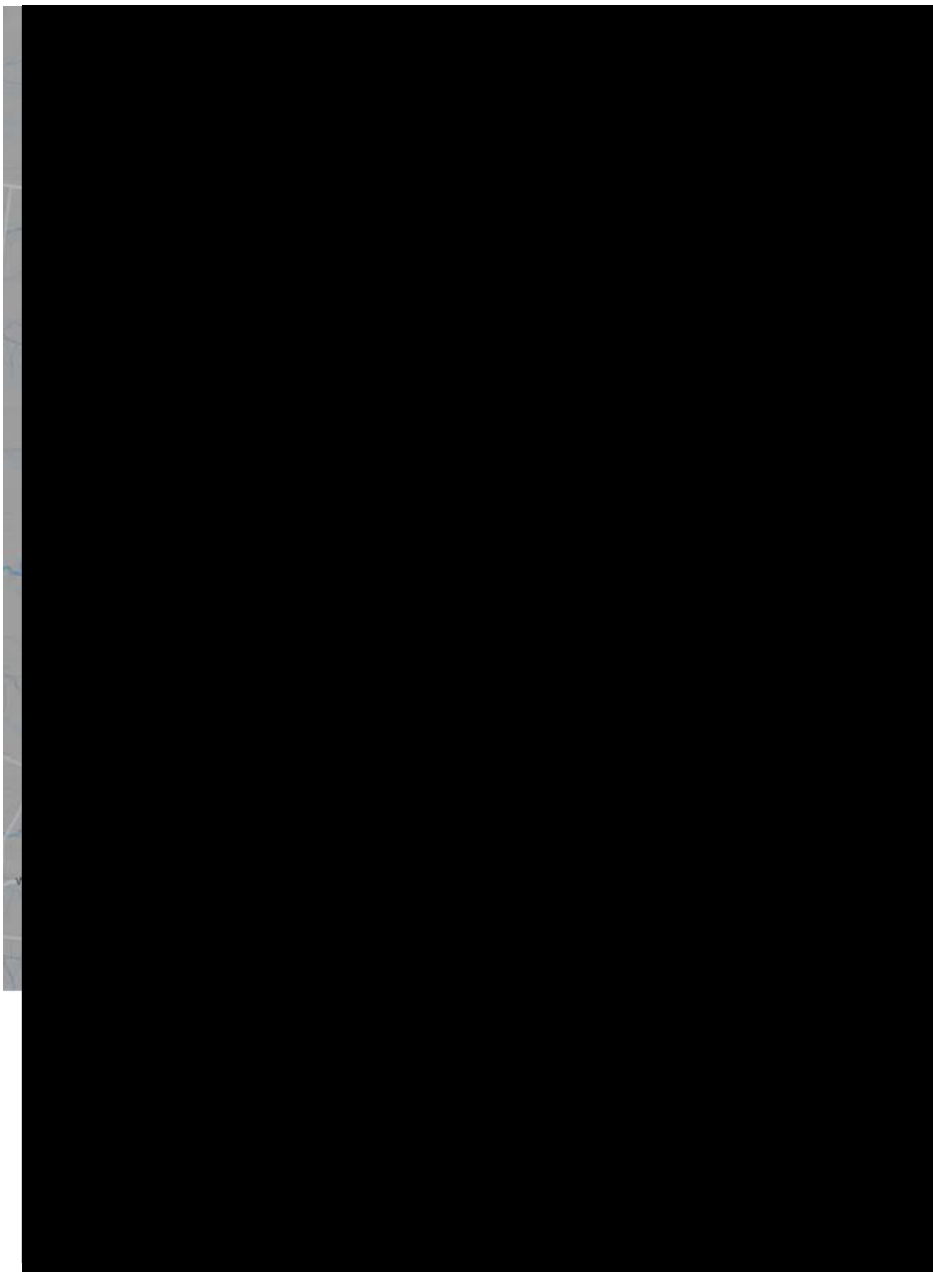


Address:

[REDACTED]
[REDACTED] Luddenham

Size:

25 acres



The following points illustrate why our property should be 100% included in the surrounding Agribusiness precinct.

1. **Our property has been identified as having Low Ecological Value by Cardno ecologists.**

Extract from Cardno Ecological report. [REDACTED]
[REDACTED]

The ecologists' overall opinion is that the cleared land and the land that supports native vegetation that has been assessed as being of low ecological value would have a correspondingly low potential for conservation.

Lack of connectivity to other remnants of native vegetation in moderate to good condition. The Subject Lands are isolated from other vegetation by Willowdene Avenue to the south west, the Sydney Orbital corridor to the west and the Northern Road realignment to the south east (currently under construction)

Loss of native understorey;

Condition of the native trees which, where the communities were assessed as being in low condition, included dead "stags", and trees with significant dieback or evidence of borer attack

Furthermore;

- The land has been historically cleared and degraded through agricultural land uses.
- Ecological studies that we have obtained confirm that there is no Riparian Corridor on our property.
- The land is not mapped as flood prone and there are no running water courses on our property (see SEPP Flood Map). Flood risk is stated as a reason for applying the Environment and Recreation zoning on page 13 of the SEPP Discussion Paper. We understand that land in the Wianamatta-South Creek area is proposed for Environmental and Recreation Zones because of government desire for a Blue-Green Grid, meaning combined waterway and vegetated landscape. Our property does not meet these criteria
- Over the last 20 years trees have been dying on our property, as well as neighboring properties. When on the property this is very evident. (Aerial views do not show the poor state of the trees on the property). As a result of the addition of the new Northern Road (50 metres away from our property), the M9 Orbital, railway corridor, airport (with flightpath less than 1km away from centre of our property), and the industry to come from the Agribusiness precinct, the health of the remaining trees on the property will only increasingly deteriorate.
- 50% of our property has no vegetation at all (refer to images 1 - 4), of the 50% that has trees, approximately 25% of the trees are dead (see images 5 - 9), and approximately 15 - 25% are dying.
- Cardno Ecologist [REDACTED] stated in his report (attached), that the property has limited conservation value, and had very limited value for bio banking purposes, due to both the quality and quantity of healthy trees available on the property. Significant investment would need to be made to the property to improve the biodiversity and conservation value of the property.

- The amount of healthy Cumberland Plain Woodland is small and isolated, it does not form part of a corridor, and for the reasons stated above, has limited chance of flourishing. Furthermore, the CPW will be isolated from other tracts by the proposed Western Sydney Orbital Motorway, further decreasing its viability as an ecological resource.



Image 1



Image 2



Image 3



Image 4



Image 5



Image 6

Note: Smaller trees in background are on neighbour's property.



Image 7



Image 8

Google Maps Aerial Shot

State of trees on property

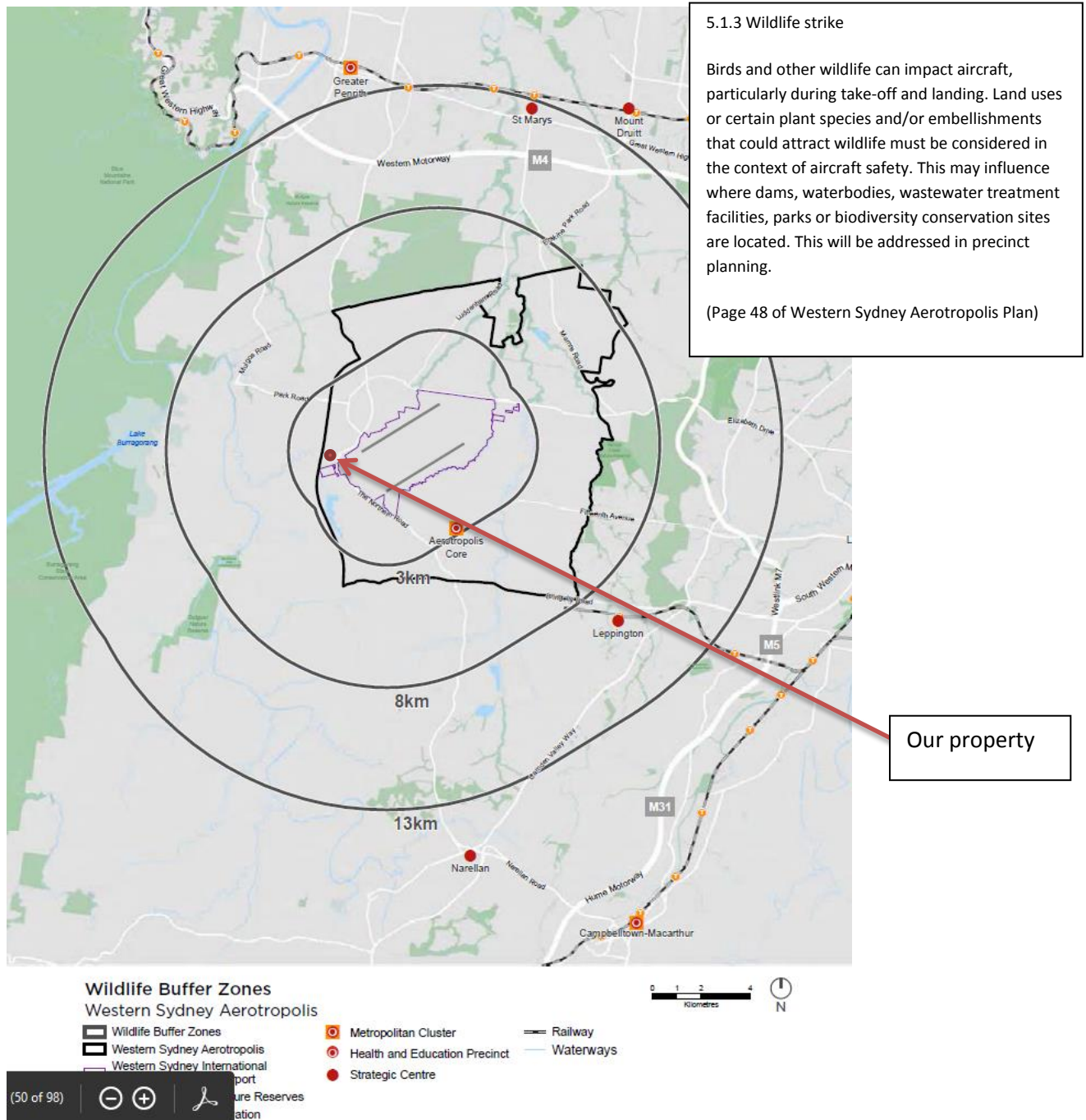


Image 9 – showing the amount of non vegetated land, as well as the proportion of dead trees and dying trees on the property.

Note: This google image was taken at least 3 years ago, and the tree quality has deteriorated further since the image was taken, Furthermore, the aerial photo also show's tree shadowing, which make the trees appear more dense than they really are.

2. The proposed zoning poses a threat to the flight path

The government intent of Environment and Recreation zone is to preserve, extend and restore the green vegetation according to page 10 of Draft DCP. However, page 9 of SEPP Discussion Paper and appended map states intent of reducing wildlife attractive landscapes within 3km of the airport to safeguard it against wildlife strikes. **Our property is 250 meters away from the airport boundary, and less than 1km to the runway.**



3. The proposed Zoning undermines the strategic intention and value of the Aerotropolis

- Referring to the Draft Western Sydney Aerotropolis Development Control Plan (Draft DCP) Phase 1. (2.5 Agribusiness Precinct) Pages 22 to 24 highlight the importance of this south-western zone to Aerotropolis. The South-West position is envisaged for construction of an Agriport, connecting Outer Sydney Orbital, Agribusiness Zone and Airport. The proposed zoning of our property as Environment and Recreation appears counter intuitive to such a transport and logistics plan.
- Further, the proposed zoning will result in an isolated parcel of Agribusiness zoned land to the south west. This may impact on the viability of that land parcel to support Agribusiness uses.

4. Plenty of high quality alternatives

- All planners and ecologists () that have visited the property have thought it strange that such a potential zoning has been applied to this property, given the limited quantity and poor health of the trees on the property. Furthermore there is an abundance of high quality Cumberland Plain already being conserved in the South Creek Corridor, Riparian Corridors throughout the entire Aerotropolis including the Agribusiness precinct, as well as on the opposite side of Willowdene Avenue.
- The Aerotropolis is bound by many open woodland and areas of denser vegetation, such as the Blue Mountains national Park, Burragorang State Conservation Area, Western Sydney Regional Park, and the Wianamatta South Creek Corridor. (See image 10 next page)
- It seems illogical to retain a small isolated doughnut hole for conservation purposes, where the land clearly could and should be used to maximize the value and potential of the Agribusiness precinct, and not disrupt this corridor of activity.
- The proposed 70 acres of land (3 affected properties), seems too large for recreation and parkland, and a wasted opportunity to maximize the Agribusiness precinct, particular when the property is so close to the freight, logistics and Commercial Precinct.
- The existing native vegetation on our property has been given a low rating by ecologists who inspected the property in late 2019. High value native vegetation is stated as reason for applying Environment and Recreation zone on page 13 of SEPP Discussion paper. Land in the Wianamatta-South Creek area are proposed for Environmental and Recreation Zones because of government desire for a Blue-Green Grid, meaning combined waterway and vegetated landscape.
- In relation to Recreation, Luddenham already has a large park, Sales Park (which includes Robert Green Oval). Any further recreation or parkland should be adjacent to this existing park.
- It does not make sense to have recreation or parkland in the middle of Agribusiness precinct, which will be far away from residential homes, universities, or the general population.



Image 10 – Orange circles depicts other alternative sites, with much higher density of trees and trees that are in much better health, than our property outlined in purple.

5. The proposed zoning of our property is unreasonable & unconscionable

The proposed zoning of both the [REDACTED] (neighbouring property also earmarked for Environment and Recreation) would mean that we would effectively be the only 2 residential homes left in the Agribusiness Precinct. This means two large families would be forced to live (isolated) between the new Northern Road, Airport, the Western Sydney Orbital, rail corridor , and Agribusiness activities. The proposed zoning will eliminate any commercial investment opportunity because of strict restrictions on Environment and Recreation compared to Agribusiness, as stated on pages 19 to 22 of SEPP Discussion Paper. The consequence of proposed zoning will be severe degradation of property values with no opportunity for investment and development. This would make the property almost impossible to sell, so our family and our neighbors family would be the only households forced to live in the middle of this undesirable precinct. This is highly unreasonable and unconscionable, and a position we would be forced to oppose vigorously.

6. Other Unintended Consequences

- The proposed zoning of our property essentially cuts the Agribusiness precinct in two, disrupting the overall flow of the precinct.
- Furthermore our proposed zoning isolates (land locks) our neighbors property to our right (orange triangle below). The new Northern Road corridor splits our neighbors property in two, leaving an isosceles shaped piece of land adjoining our property (currently proposed as Agribusiness - see diagram 11 below). His land could only be used or maximized by joining our land, so the proposed zoning is also unfair to our neighbor, and further restricts the availability of valuable/suitable Agribusiness land. The yellow triangle shows the part of the neighbors land that would be unusable, if our property was designated Recreation or parkland.



Image 11 – showing neighbors isolated and landlocked parcel of land, and our property in purple. The yellow triangle shows land that would be unusable.

Conclusion

The zoning of our property as conservation land will not contribute to suitable environmental restoration or biodiversity conservation gain, but rather lead to misguided use of land. The Government should undertake targeted conservation to restore better quality / quantity native vegetation in locations of the Cumberland Plain that are not proposed to be developed in the future and not spatially unconstrained by the direct and indirect impacts of a major Aerotropolis.

Furthermore, it is unconscionable to leave only two residential families stranded within the Agribusiness precinct, and overall Aerotropolis without any financial options and to restrict the viability for Agribusiness purposes of the adjacent land.

Our family welcomes the Agribusiness precinct to the area, and would like to be a part of this exciting development in the area. Our family is seriously considering starting an agribusiness activity on the property along with our neighbour to our right who is a farmer who currently grows fresh vegetables for the Sydney market.

In particular the family has interest in capitalizing on the increasing domestic and international demand for high-quality fresh food and value-added pre-prepared meals. We see this as a big growth opportunity for Australia, and for our family to partake in. We are keen to partner with our neighbor to see how we could combine forces to increase production to export to Asia.

This ambition can only be realized if our property is zoned agribusiness.

Lastly, if there are some trees that are of value to be preserved on the property, we feel this can be achieved when Development Applications are submitted and assessed, and a more detailed analysis of the site is investigated as part of the existing process. This would be a much more constructive and fairer way to assess the land, as opposed to using a very broad brush approach at this very early stage of the precinct planning process.

We also welcome the DPIE to come and inspect our property, if that will assist in making a more informed decision.

We submit that the proposed zoning of this and adjacent properties requires further detailed examination before finalization in order to achieve the desired planning outcomes of the Plan and to protect the legitimate interests of the land owners.

Please consider the content of this submission in future revisions of the Aerotropolis Plan.

[REDACTED]

[REDACTED]

[REDACTED]

(On behalf of [REDACTED] – land owners)