

[REDACTED]

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**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Submission Details for company Knight Frank Town Planning (org\_comments)  
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Disclosable Political Donation:

Agreed to false or misleading information statements: yes

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Content:  
See attached

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Submission: Online Submission from company Knight Frank Town Planning (org\_comments)  
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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. 18-017-5)**

On behalf of our client, *Attilol Pty Ltd*, we would like to thank you for the opportunity to comment on the Department of Planning and Environment's (DPE) *Draft Western Sydney Aerotropolis Land use and Infrastructure Implementation Plan (Stage 1 initial precincts)*, which is hereinafter referred to as the Draft LUIP.

Our client owns a large landholding located at [REDACTED] and [REDACTED] Orchard Hills. This land is legally known as [REDACTED] and [REDACTED], and comprises 125 hectares – See Figure 1. For the purpose of this submission, we refer to this as 'Luddenham Hills'.

The North-South Rail corridor is proposed to be located immediately adjacent to the western boundary of Luddenham Hills within the Commonwealth Defence land – See Figure 2.



**Figure 1: Luddenham Hills (Source: SixMaps)**

Luddenham Hills is strategically placed at approximately:

- 800 metres - west of Twin Creeks Estate (housing and golf club precinct).
- 2 kilometres - north of the Sydney Science Park station, and west of Erskine Business Park
- 4 kilometres - south of the M4 Motorway
- 5 kilometres - north of the Western Sydney Airport

Whilst Luddenham Hills is located to the immediate north of the land included in the Draft LUIP, the proximity to the LUIP area provides the basis for the following comments:

### **1. Related Precincts – Timing**

Luddenham Hills is located within an area identified as 'Related Precincts' in the Draft LUIP – **See Figure 2.** We note the precinct aligns with the proposed North-South Rail Link (Stage 1) which is proposed to be operational for the Western Sydney Airport opening in 2026.

The Draft LUIP states that:

*"The planning for these initial precincts will align with planning for a new growth area for the Greater Penrith to Eastern Creek Corridor, particularly around St Marys where the proposed North-South Rail Link will connect to the existing transport network" (pg.5).*

Within the related precinct, Luddenham Hills by virtue of its size, single ownership and location, has the potential to be a significant contributor to shaping the future range of uses and density of development, particularly when accounting for the potential of the precinct following the establishment of the North-South Rail passenger line.

The passenger rail line and the potential for rail stations is a 'game changer' for the 'Related Precinct' that should be the basis for describing the precinct as a transit corridor unlocking the potential for higher density mixed use centres.

Despite this, the LUIP provides little detail on the future use of this precinct, and no indication of the timing for the planning and development of this significant 'Related Precincts'.

**On behalf of our client we request clarification on the timing for the planning and delivery of the 'Related Precincts'.**

### **2. Matching Infrastructure & Land Release**

The LUIP identifies initial precincts ('Aerotropolis Core', 'Northern Gateway' and 'South Creek') which will be the focus of development initially, with zoning expected by the end of 2019.

According to the Draft LUIP:

*"The remaining six precincts will be sequenced to match infrastructure investment and population and employment growth. Detail on how these precincts will be rezoned will be provided in the second stage of the Land Use Plan" (pg. 5).*

We note that the proposed alignment of the North-South Rail Link is partly located within these initial precincts (Northern Gateway and Aerotropolis Core), but a large proportion of the rail line is located within the 'Related Precincts' – See Figure 2. All of the lands adjoining the rail line should be planned in coordination with this new rail infrastructure. Omitting the 'Related Precinct' from the initial precincts is inconsistent with the stated intention of the LUIP for land to be '*sequenced to match infrastructure investment*'.

Development of the Related Precinct initially will provide a greater return on public investment by consolidating development in and adjacent to new transport corridors. Furthermore, this will enable the full realisation of the city-building benefits that will be brought about by the North-South Rail Link.

On behalf of our client we recommend that lands adjoining the North-South Rail Link be included in the Initial Precincts in order to coordinate infrastructure and land use planning along this essential transport corridor.

### **3. Mixed Flexible Employment and Urban Land**

Luddenham Hills is a large parcel of land in single ownership comprising of 125 hectares. A landholding of this size has the potential to make a significant contribution to the growth of the Aerotropolis, complement the future mixed use Science Park and support the nearby employment lands both at Erskine Park and within the Aerotropolis and surrounding growth areas.

With the proposed North-South Rail Link confirmed to provide city-building opportunities along the corridor, Luddenham Hills is strategic to the development of the area and is an appropriate location to support a higher density development and ideally place to provide 'mixed flexible employment and urban land' that will complement the Science Park, providing further employment and housing capacity in close proximity to existing and planned infrastructure – See Figure 3.

Our client's vision for the site includes providing a mix of employment, residential, health and educational and recreational uses, as follows:

- Employment - potential to provide up to 20,000 new jobs
- Housing – potential to provide 9,000 dwellings, providing a diversity of housing types including innovative approaches to affordable housing, build-to-rent, and aged living.
- Health and Education – A new hospital and school will complement the Science Park, and support the growing population
- Recreation – 20% public open space including an urban farm

On behalf of our client, we recommend Luddenham Hills be identified in Stage 2 of the LUIIP as 'mixed flexible and urban land'. This will support the Government broad aim of providing homes in close proximity to jobs and health and educational facilities.

### **4. Flexible Planning**

We note again, the importance of the North-South Rail line to the success of the Airport, and the importance of enabling development along this transport corridor to activate precincts and support a return on the investment in this significant transport infrastructure. To capitalise on this investment, a flexible planning framework facilitating development around stations will ensure the delivery of new employment and residential lands in a timely and efficient manner. This should include a flexible approach to the acceleration of large key sites in single ownership capable of supporting key transport infrastructure such as a rail station.

**We recommend that the Aerotropolis SEPP include particular provisions to support the establishment of development along the North-South Rail line.**

### **5. Luddenham Station**

Luddenham Hills is a large single landholding available for development in the West and provides a land area sufficient for the construction of a new station. The scale of the landholding is suitable to accommodate a Metro station precinct. Luddenham Hills is strategically placed to accommodate a train station, on the assumption that a station also proposed for the Science Park to the south.

Luddenham Hills is a largely unconstrained site and therefore suitable for a station precinct, as follows:

- Outside of ANEF noise controls - suitably placed for residential development
- Unaffected by OSL height limits – can support a higher density
- No heritage items on site.
- Small portion with biodiversity values – this will add value to the proposal by providing a new western Sydney parkland - **See Figure 2**

- o Majority of the site unaffected by flooding or the South Creek PMF Levels – with a small portion of flood affected land coinciding with the area proposed for use as urban parkland. Not many other locations along the North-South Rail Link from the Science Park to St Mary's station are to this level unaffected by flooding constraints – **See Figure 4.**

**On behalf of our client, we request Luddenham Hills be considered by Government as a suitable location for a station precinct, and this be confirmed in Stage 2 of the LUIIP.**

## **6. Corridor Alignment**

The Draft LUIIP locates the North-South Rail line to the immediate western boundary of our client's landholding alongside Defence land identified as 'Environmental Conservation' – **See Figure 2.**

We note the reference in the GSC's West District Plan (pg. 61) to the role of the North-South Rail, as follows:

*"New passenger rail in Western Sydney will play a major role in connecting to the airport and shaping the future growth and development of the Western Parkland City with the Australian and NSW governments jointly committing to delivering the first stage of the North-South Rail Link from St Marys to Badgerys Creek Aerotropolis via Western Sydney Airport. The new North-South Rail Link will create the **spine** of the Western Parkland City and play a vital role in bringing people closer to job opportunities, health, education and leisure activities. New train stations will support development of higher density housing with great transport access, meaning shorter travel times, less reliance on cars and less congestion on roads".*

The Commonwealth land will act as a physical barrier to the practical development and growth of Western Sydney. The proposed alignment of the North-South Rail Corridor is not consistent with achieving a broader planning, economic or place making outcome. This alignment is not consistent with a 'spine' or city shaping approach and it should maximise the unlocking of land on both sides of the rail line.

A shifted rail corridor to the east and located within the landholding of Luddenham Hills will provide opportunities for integrated land use development around a station. An optimal alignment cannot be achieved in its current location. The Draft LUIIP needs to ensure planning of infrastructure is coordinated with land use in a manner which will ensure the best possible planning outcome.

Furthermore, the alignment of the Outer Sydney Orbital (OSO) transport corridor (M9 Motorway and freight line) in the indicated alignment will prevent the North-South Rail Link from achieving the best planning and development outcome – **See Figure 5.** The placing of the OSO transport corridor to the immediate east of the rail corridor will act as a major physical barrier to the creating of future communities, particularly if as assumed a rail station could be located on the rail line on our client's landholding at Luddenham Hills.

Consequently, the alignment of the transport corridors is contrary to:

- The creating of 'great places' through the development of new communities based on proper place making as advocated by Government;
- Maximising the return for Government of unlocking suitably located land for future urban development; The broader city making objectives of Government; and
- An integrated approach to infrastructure and urban development.

Land use and transport infrastructure should address a whole of place-making approach that is consistent with creating new communities. Identifying an optimal route for corridors need to reflect whole of place making, city building outcomes as well as economic to ensure the success of the Aerotropolis.

**On behalf of our client, we recommended that the North-South Rail corridor be shifted to the east to lands within Luddenham Hills, to maximise the 'city shaping' opportunities of the new rail line. The OSO should be also shifted east and in alignment with the existing transport corridor of Luddenham Road.**

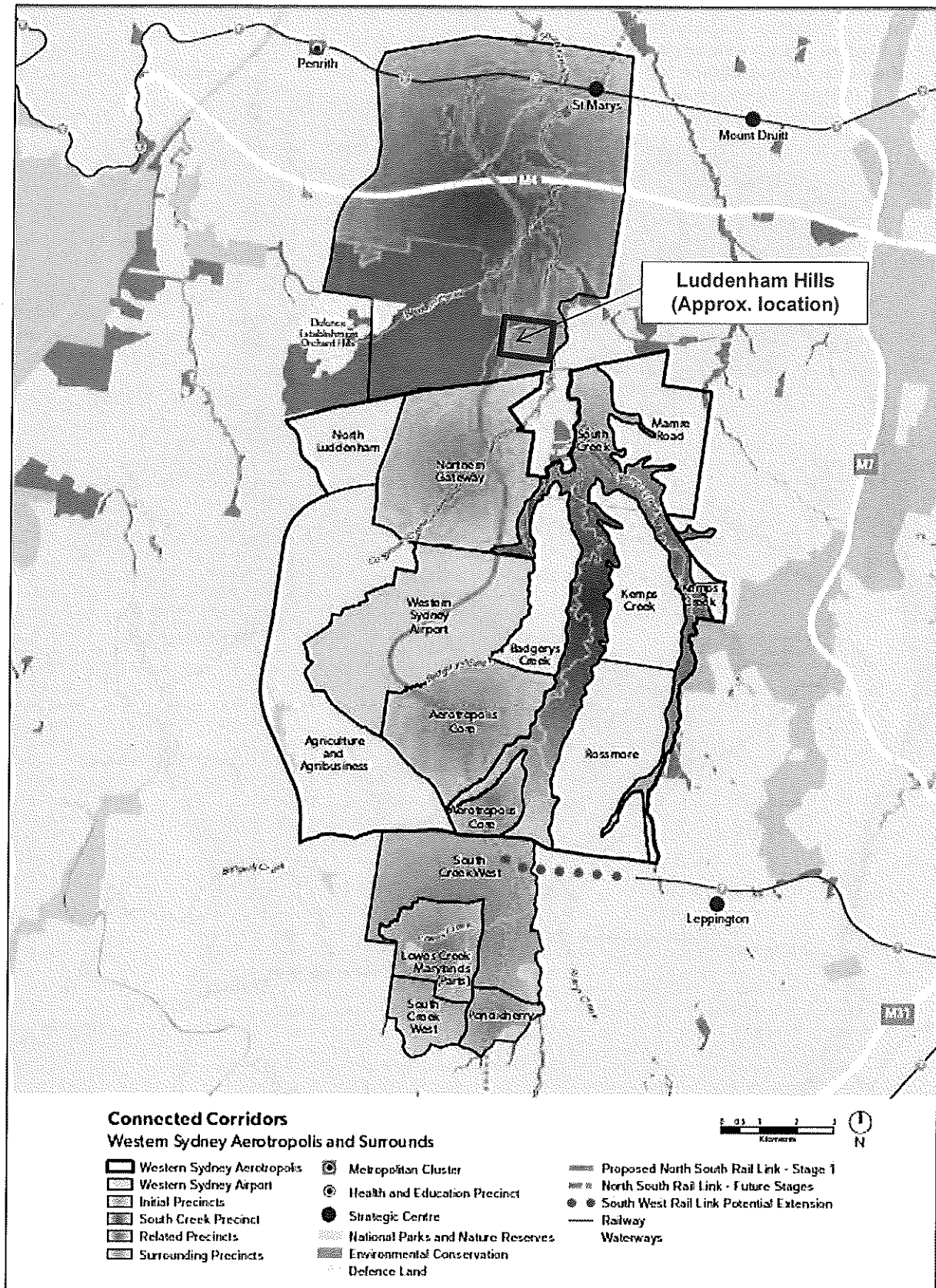


Figure 2: Aerotropolis and Related Precincts (Source: DPE, Draft LUIIP)



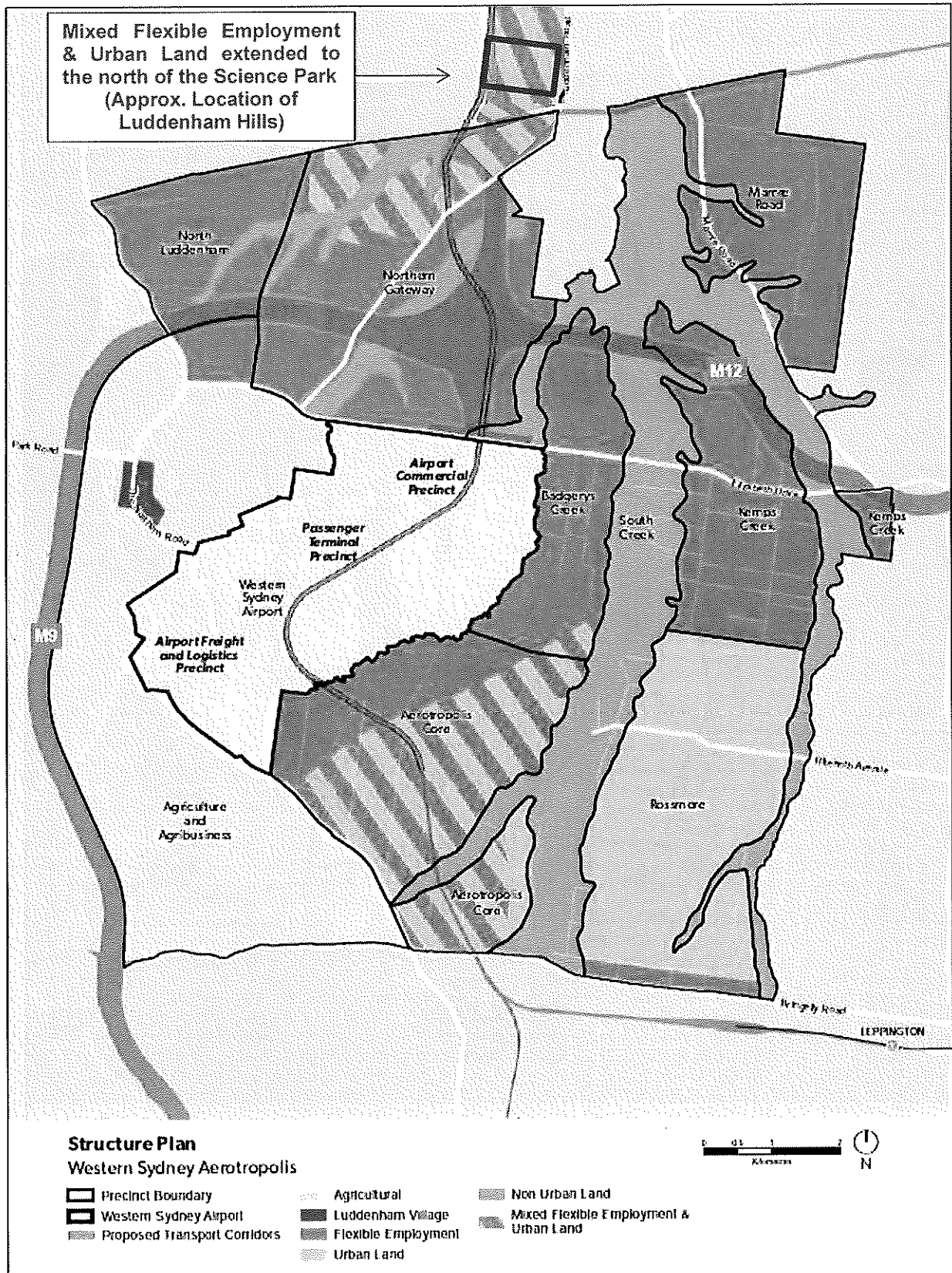


Figure 3: Extension of Mixed Flexible Employment & Urban Land (Source: DPE, Draft LUIIP)

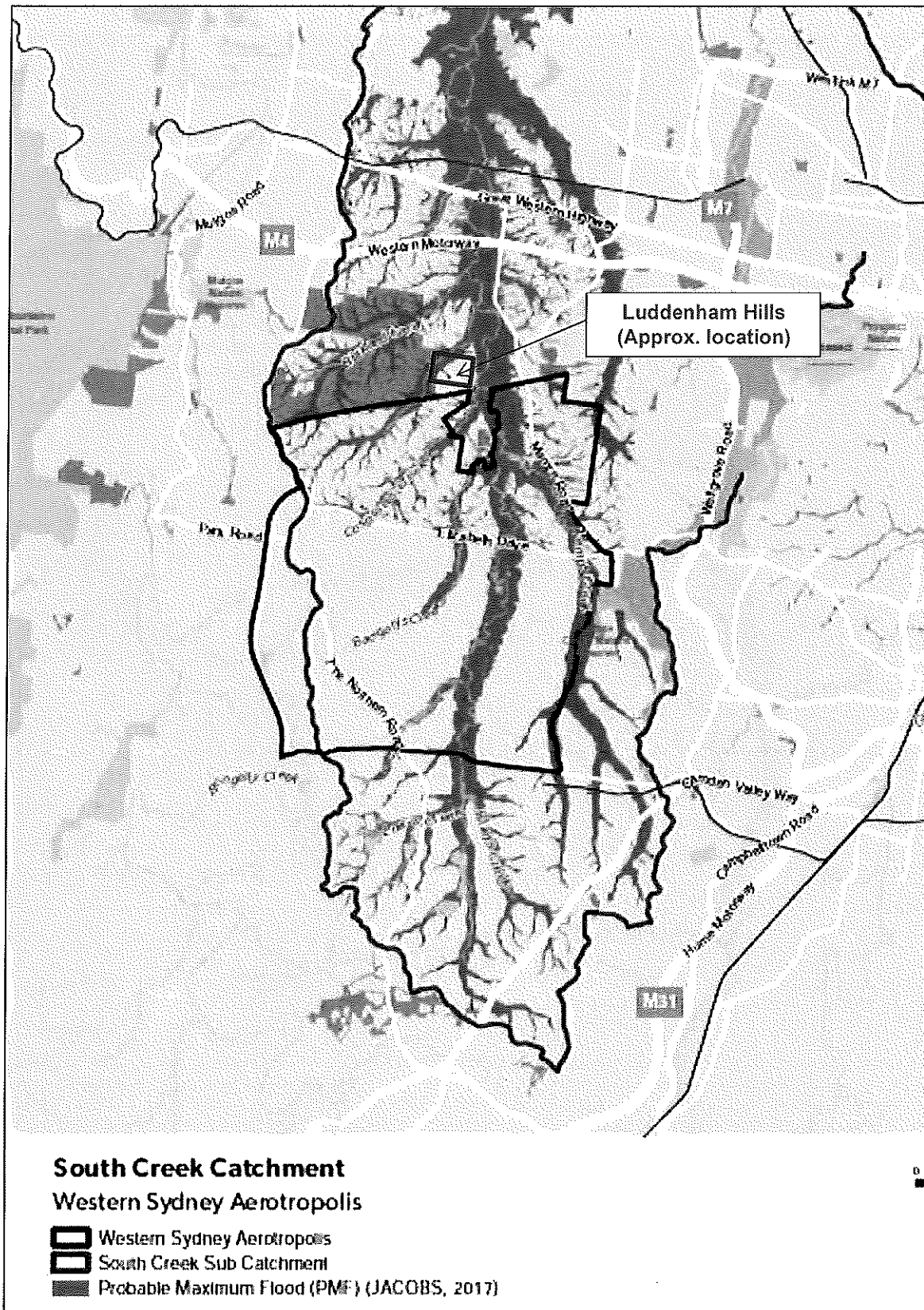


Figure 4: South Creek Catchment (Source: DPE, Draft LUIIP)



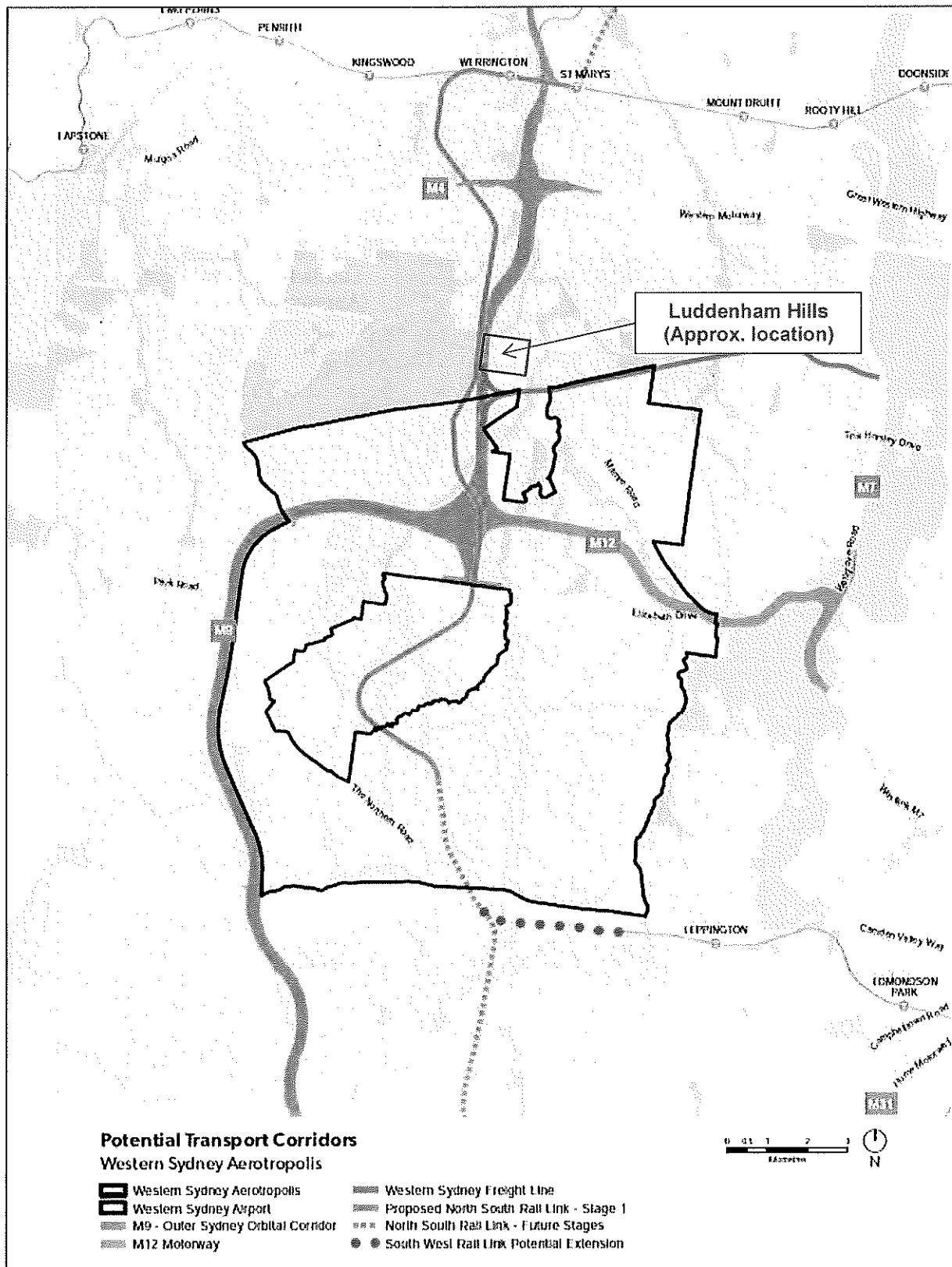


Figure 5: Transport Corridor Alignment (Source: DPE, Draft LUIIP)

In summary, we provide the following recommendations:

- The Stage 2 LUIIP should provide clarification on the timing for the planning and delivery of the 'Related Precincts'.
- Lands adjoining the North-South Rail Link should be included in the 'Initial Precincts' to coordinate infrastructure and land use planning along this essential transit corridor.
- The Aerotropolis SEPP to include specific provisions to support the establishment of development along the North-South Rail Link.
- Luddenham Hills be identified in Stage 2 of the LUIIP as 'Mixed Flexible and Urban Land'. This will support government's aim to provide homes in close proximity to jobs and health and educational facilities.
- Luddenham Hills be considered by government as a suitable location for a station precinct, and this be confirmed in Stage 2 of the LUIIP.
- The North-South Rail corridor be moved to the east to lands within Luddenham Hills, to maximise the 'city shaping' opportunities of the new rail line. The OSO transport corridor should also be shifted east, and in alignment with the existing transport corridor of Luddenham Road.

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

Yours sincerely



Mark Grayson  
Director, Knight Frank Town Planning  
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