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From: system@accelo.com on behalf of Robert Bennett [REDACTED]
Sent: Friday, 2 November 2018 4:22 PM
To: [REDACTED]
Subject: Submission Details for company Elton Consulting (org_comments)
Attachments: 292178_2018 2 11 Letter to DPE 2 November 2018.pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

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Govt. Agency: No
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Content:
The attached submission is made on behalf of Silky Property Group

IP Address: - 203.53.136.196
Submission: Online Submission from company Elton Consulting (org_comments)
https://majorprojects.accelo.com/?action=view_activity&id=292178

Submission for Job: #9552
https://majorprojects.accelo.com/?action=view_job&id=9552

Site: #0
https://majorprojects.accelo.com/?action=view_site&id=0

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2 November 2018

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

Dear Sir / Madam

**Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan:
Stage 1 Initial Precincts (Stage 1 LUIP)**

I write with regard to the above and on behalf of the Silky Property Group.

The Silky Property Group (**Silky**) owns approximately 320 hectares of land immediately to the east of the Northern Road.

Silky support the Stage 1 LUIP in principle, and see it as an important guidance document for future land use planning and policy setting. Having said that, Silky wishes to see further detail on the outcome of a potential Special Infrastructure Contribution (**SIC**), its function, composition, assumptions and charge rate before making final comment.

The vast majority of the Silky landholding lies within the area identified as "**North Luddenham**" precinct in the Stage 1 LUIP. However, there is also a small section of land in the precinct identified for and as "**Agriculture and Agribusiness**".

All of the Silky lands are identified for "**Flexible Employment**" in the Stage 1 LUIP Structure Plan. Silky wishes to discuss the definitions of Flexible Employment and Agribusiness with the Department in greater detail, so that it can properly respond to interested third parties.

It appears the split of the Silky landholding across two precincts is a result of the precinct boundary being drawn along the notional boundary formed by the southern extent of the proposed M12 / Outer Sydney Orbital.

Silky acknowledges that boundaries to precincts have to be drawn somewhere and there is some logic to the M12 / OSO being used in this way. However, this leaves the Silky lands – a cohesive area of mostly cleared farmland – sitting astride two precincts with a significantly different focus.

Indeed, the Silky lands – together with some immediate neighbours that lie immediately east of the Northern Road and north of Elizabeth Drive - are the only lands within the broader Agriculture and Agribusiness precinct identified as "Flexible Employment".



A more logical North Luddenham precinct boundary would appear follow the Northern Road south to its junction with Elizabeth Drive, and then along Elizabeth Drive up to the boundary with the Northern Gateway Precinct. Any significant amendments to the alignment / southern boundary of this section of the M12 / OSO during detailed design might also then fall within a single precinct.

Silky does not oppose the identification of the Initial Precincts, which currently exclude North Luddenham. However, Silky wishes to suggest this be rethought: the Initial Precincts are centred around two key elements: South Creek (and its emphasis on water reuse) and the proposed North South Rail Link.

This designation *appears* to ignore the significant expenditure currently underway upgrading the Northern Road along the boundary of North Luddenham precinct, with its direct connection to the M4 and the City of Penrith.

We suggest the Department reconsider the boundary of the Initial Precincts and include North Luddenham: It can be made available (at least in part) to provide short and medium term development opportunities whilst the other Initial precincts await their significant new infrastructure to be designed and delivered.

Silky would be happy to discuss these options further with the Department.

Yours sincerely

Robert Bennett
Director, Urban and Regional Planning