

30 November, 2020

The Western Sydney Planning Partnership,
c/- NSW Department of Planning, Industry and Environment
Submission via online NSW Government Planning Portal

Re: Draft Aerotropolis Precinct Plan: November, 2020

Dear Sirs,

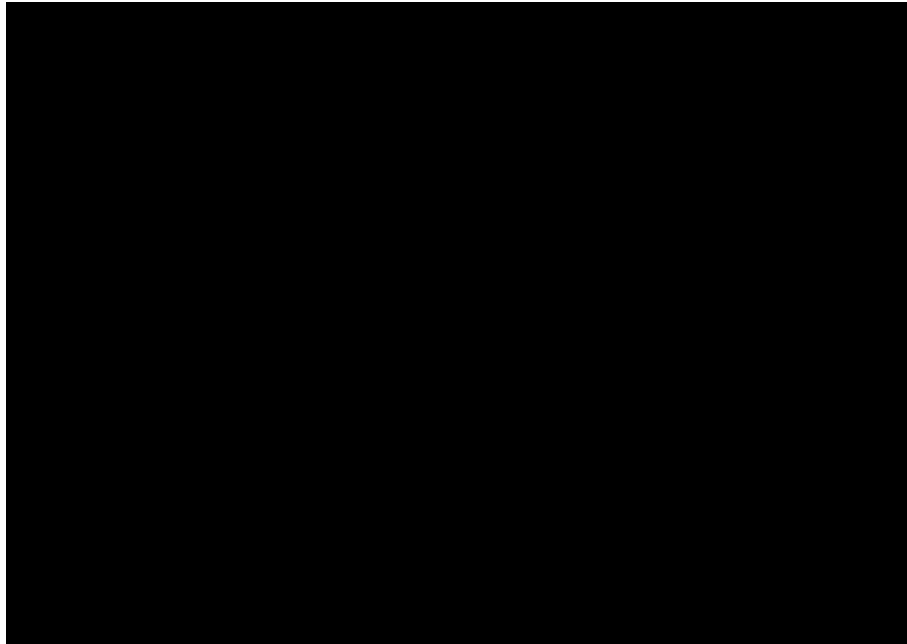
Please accept this submission in response to the exhibition of the Draft Aerotropolis Precinct Plan ('Plan') and accompanying reports. We make this submission as option holder under Put & Call Option dated 16 July, 2020 between the Royal Institute for Deaf and Blind Children and Maxum Projects Pty Limited in relation to purchase of [REDACTED] Elizabeth Drive, Luddenham (the 'Property').

Introduction:

We congratulate the Western Sydney Planning Partnership on the work that has been put into preparation and exhibition of the Plan. The logistics involved in pulling together and accurately interpreting information for such a large land area must have been quite daunting.

Whilst the Plan is impressive and clearly well considered, it is inevitable given the scale involved that some relatively minor inconsistencies may arise. This submission seeks to address one such circumstance.

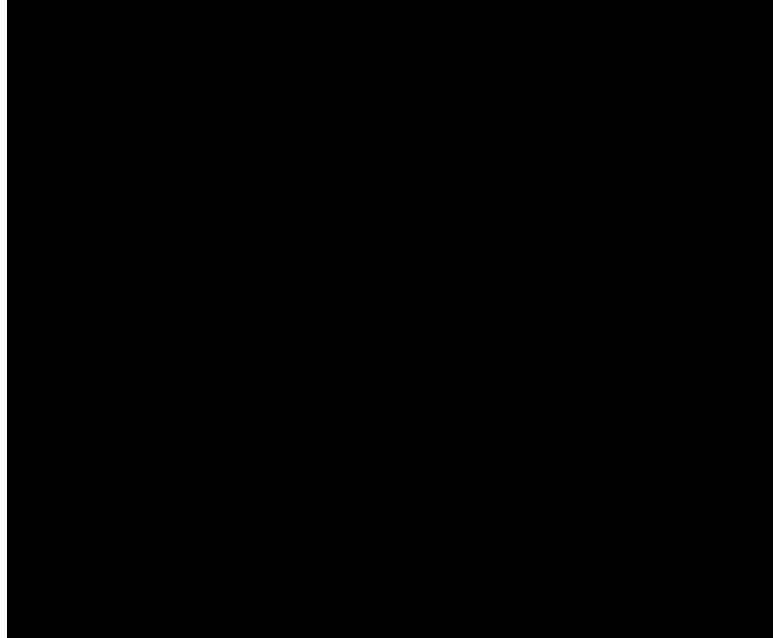
The Property is located on Elizabeth Drive, Luddenham as shown following.



It has an area of approximately 10.2ha, and is currently vacant. It features gently undulating landform and is devoid of natural vegetation.

Submission relating to the Property:

Plan proposes that a large corridor of land to the immediate north of Elizabeth Drive be set aside for drainage and open space purposes as highlighted in the Plan excerpt following (the 'Reservation').



This proposed Reservation is considered inappropriate for the following reasons:

1. **The scale and nature of the Reservation is inconsistent with the location:** Being at the very top of the catchment (bounded by The Northern Rd and Elizabeth Drive watersheds), the natural depression encompassed by the proposed Reservation is just that: a depression as distinct from a watercourse. It does not convey water except during periods of significant rainfall, and does not feature any natural vegetation or original landform elements. Its status is perhaps exaggerated by the number of agricultural dams on the Property and adjoining lands, something that is reflective of its agricultural use rather than riparian importance. See recent site photographs following:

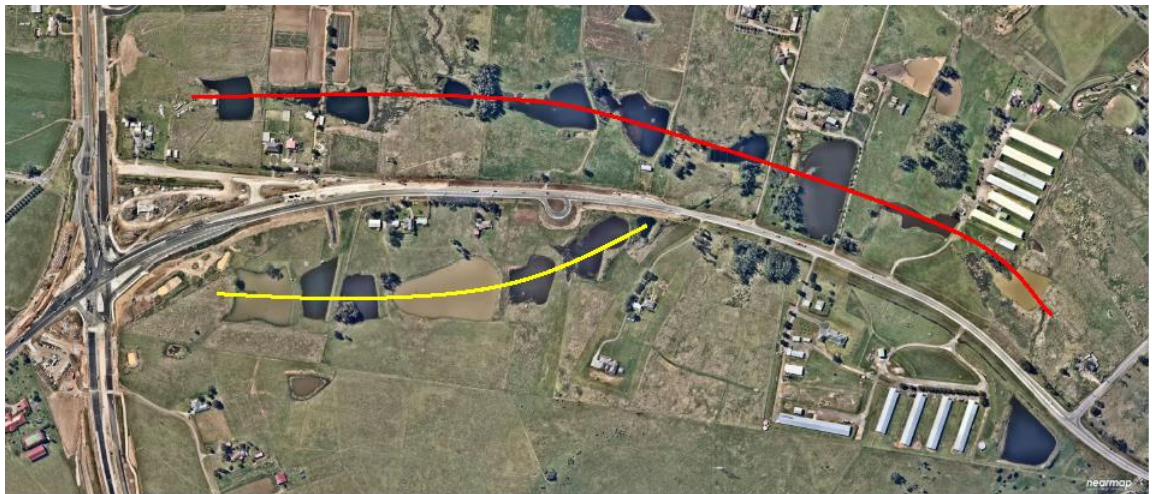


2. **The proposed water WSUD drainage basin is inappropriate:** Following from point (1) above, the location and scale of a proposed WSUD drainage basin (Plan Fig. 12, see excerpt following) is inconsistent with the location at the top of the natural drainage catchment.



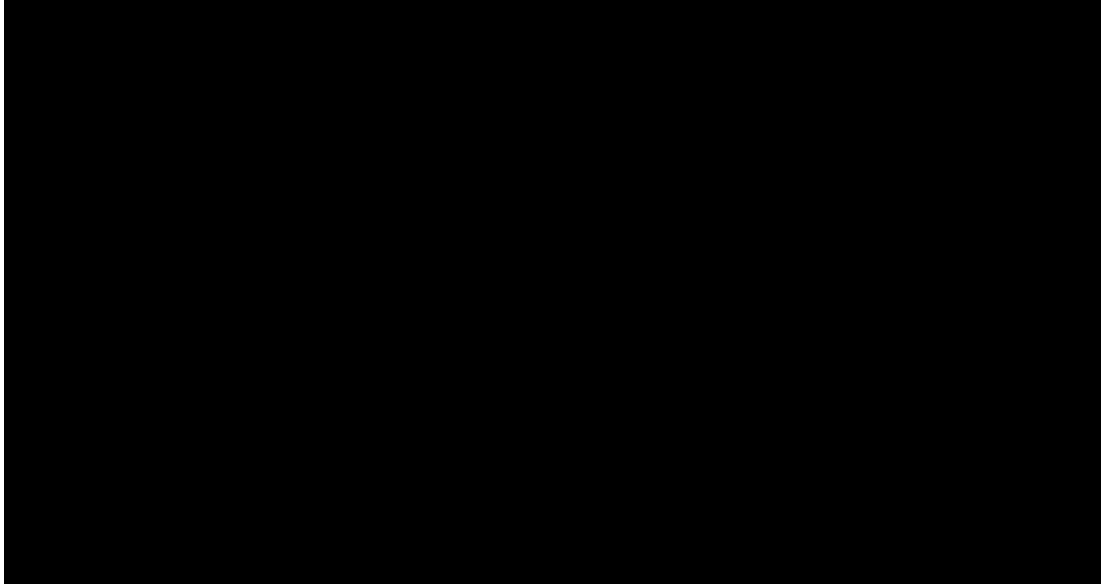
Not only is the scale inappropriate for such an insignificant catchment, the proposed basin abuts Elizabeth Drive, something incongruous with its status as the watershed (high point). It is therefore both impractical and an inappropriate financial burden for all stakeholders. It potentially therefore diverts valuable funding from locations that would deliver far greater sustainability benefits.

3. **The Plan is inconsistent in treatment of adjoining areas featuring similar landforms:** The opposite (southern) side of Elizabeth Drive features the same landscape, though probably more significant waterbodies and a slightly larger catchment. See Nearmaps graphic following, with the respective watercourse centrelines marked in red and yellow.



The area between and including the natural depression on south side of Elizabeth Drive is proposed for unrestricted enterprise development in the Plan. This is entirely appropriate given the prevailing landform, location and absence of significant environmental value. We question why the same approach has not been taken on the north side of the road where the landform is if anything even more conducive to unrestricted development.

4. **The Plan contains inconsistencies in definitions of riparian corridors:** Plan Fig. 51 (excerpt following) deals with Northern Gateway Scenic Values, and defines the extent of a 'Creek/riparian corridor' adjacent to Elizabeth Drive.



The western extent of this corridor (highlighted with a red circle on the above excerpt) aligns with a proposed north-south roadway that is to the east (downstream) of the Property. This boundary happens to approximately align with the juncture of the two watercourses noted in point (3) above, and is a more logical location to commence a riparian corridor. Fig. 51 and Fig. 12 are therefore in apparent conflict: our view is Fig. 51 should prevail as a more pragmatic approach to site attributes and overall sustainability.

5. **The Plan misses an opportunity to create a Gateway:** The (realigned) intersection of Elizabeth Drive and The Northern Road is a prominent location in close proximity to the new Airport. It presents an opportunity to create a gateway: an exemplar of enterprise development outcomes that delivers both an entry point and linkage between the Northern Gateway and Agribusiness Precincts. The proposed Reservation would circumvent this opportunity.
6. **The Plan does not deliver a sustainable outcome:** In proposing to reserve a large area of undulating grassland for drainage / open space purposes, the Plan fails (at least in relation to the Property and its neighbours) to deliver a sustainable outcome. We believe the Government has a responsibility to (a) ensure it gains maximum development efficiency from unconstrained lands as a means of achieving the best return on its investment, and (b) concentrate efforts and funding on conserving those areas that can deliver substantive sustainability outcomes. We respectfully submit it fails both tests in relation to the subject Property and its immediate neighbours.

Outcome Sought:

We request that the proposed development outcome for [REDACTED] Elizabeth Drive (and adjoining properties) be consistent with that applied to identical lands on the opposite side of the road. This both delivers a sustainable outcome and consistent outcome that is far more likely to encourage successful Plan implementation. The proposed Reservation impacting numbers [REDACTED] Elizabeth Drive should therefore be deleted.

We welcome your confirmation of intention to amend the final adopted Precinct Plan in accordance with this submission in due course.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'DWH', is written over a light blue rectangular background.

David Whitting
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