

4 March 2021

Our Ref. 21-004

NSW Department of Planning, Industry and Environment
Western Sydney Aerotropolis Draft Precinct Plans
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Lodged online via NSW Planning Portal

Dear Sir/Madam,

Re: Submission on Western Sydney Aerotropolis Draft Precinct Plans

This submission relates to the Department of Planning, Industry and Environment's *Draft Aerotropolis Precinct Plan* (Draft Precinct Plan) that is currently on exhibition. On behalf of the Royal Institute for Deaf and Blind Children (RIDBC), we thank the Department for the opportunity to comment.

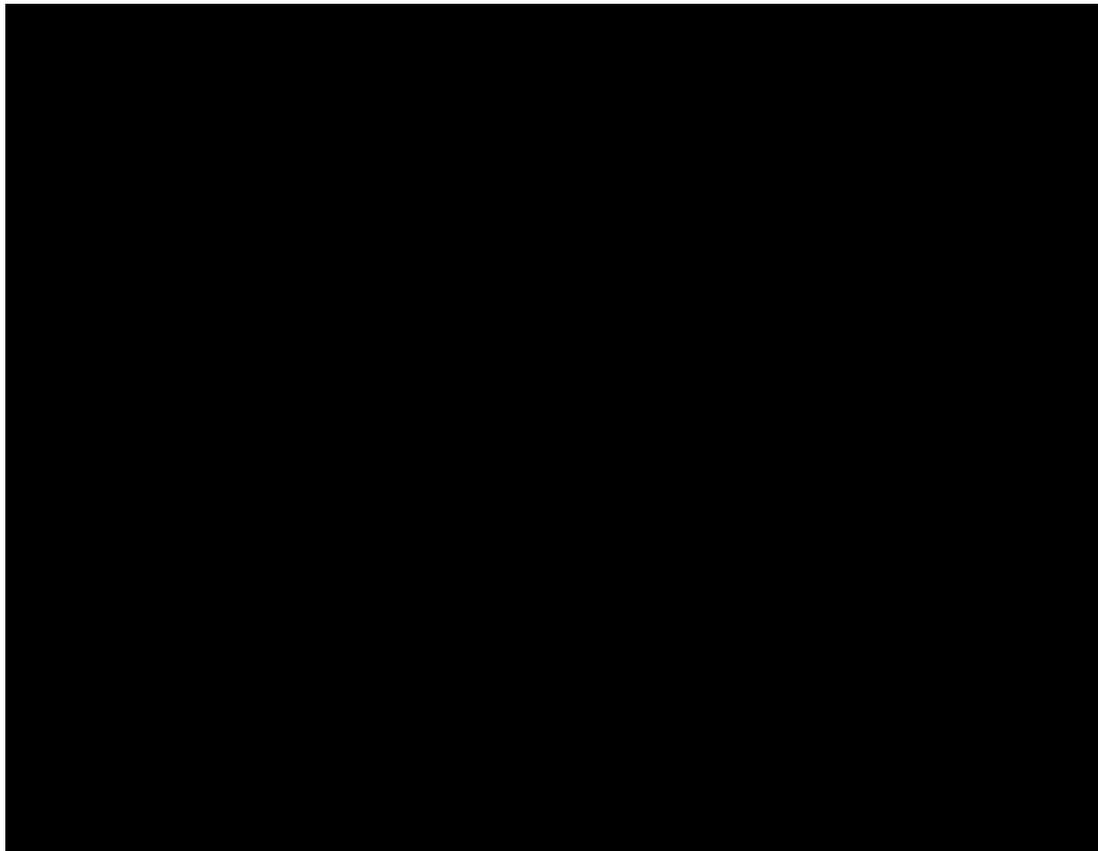
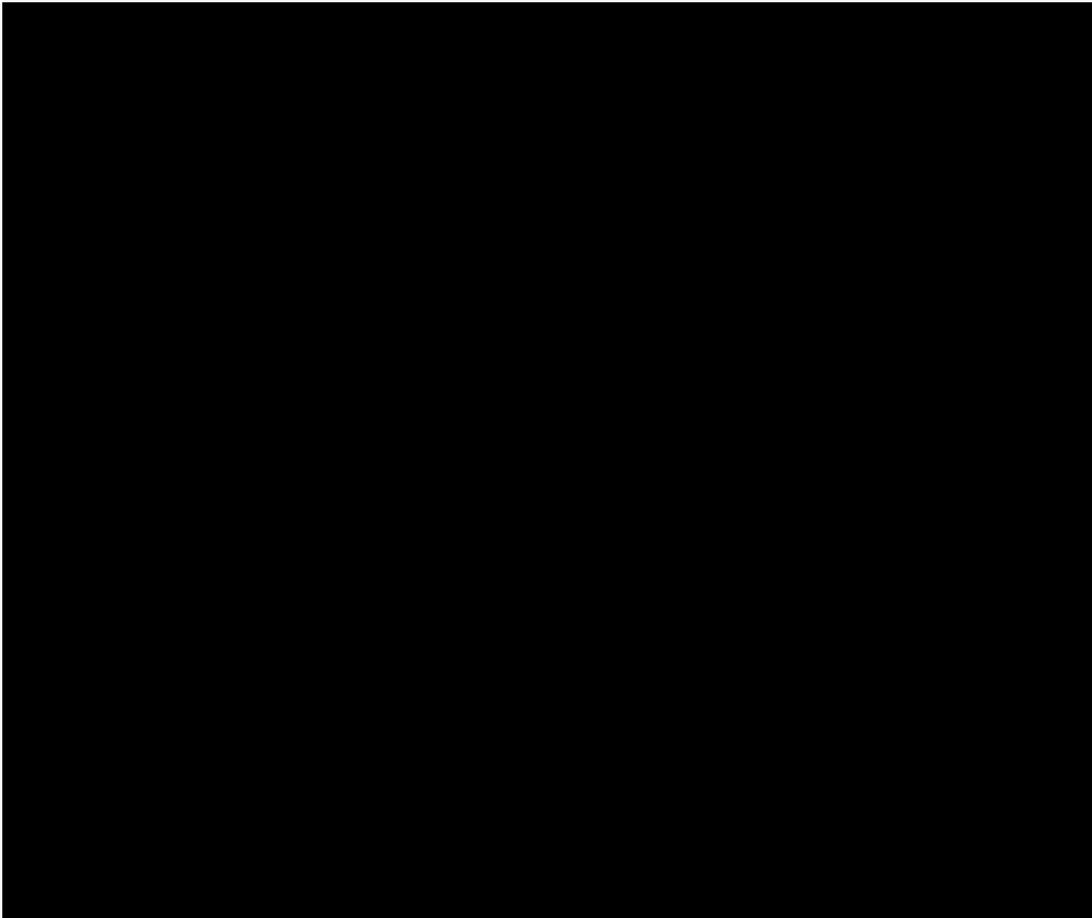
The RIDBC is the owner of the landholding located at [REDACTED] Elizabeth Drive, Luddenham. The landholding is approximately 10 hectares, located off Elizabeth Drive in close proximity to the Northern Road. It is legally known as [REDACTED] and identified as part of the *Agribusiness Precinct* in the Aerotropolis plans.

The RIDBC landholding is identified as part of the Agribusiness Precinct in the Aerotropolis plans. The site is zoned as Enterprise (ENT), with parts of the site also zoned as Environment and Recreation (ENZ), within the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (See **Figure 1**).

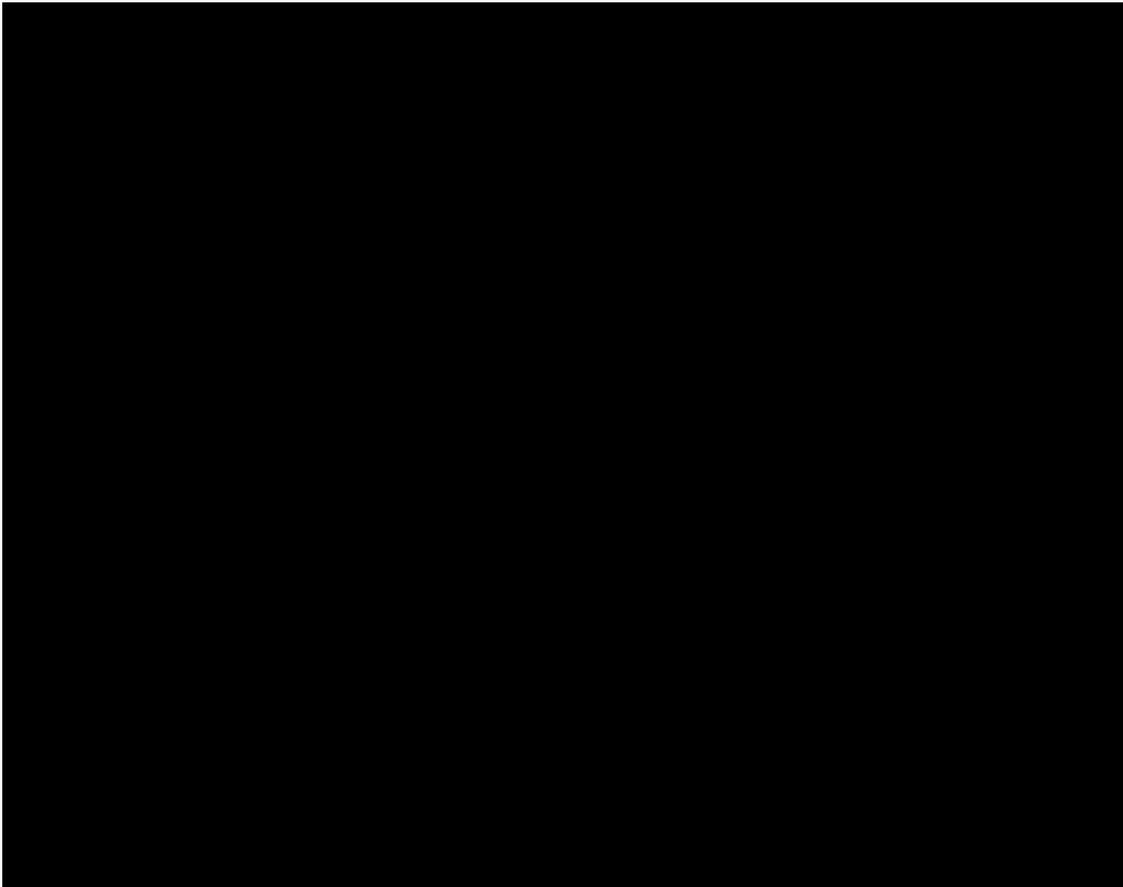
We note the following with regards to the Draft Precinct Plan and the RIDBC landholding:

- A large portion of the RIDBC landholding is identified as open space in the Draft Land Use Plan although we note that the legend in the Combined Land Use Plan (see **Figure 2**) does not actually refer to open space. We strongly suggest that the proposed extent of open space is excessive when compared to the area actually zoned Environment and Recreation (ENZ) (See **Figures 1-2**).

We are not aware any planning basis or justification for the extent of land proposed as open space and accordingly, strongly object to. There is a significant economic cost to the RIDBC of setting aside that much land for open space. On behalf of the RIDBC we seek advice on what basis would the land be set aside, that is, is it to be acquired or proposed to be dedicated? If it is to be dedicated, will that be recognised as an offset against any infrastructure contributions, State or Local?



- The RIDBC landholding will be potentially dissected by numerous primary roads and streets (see **Figure 3**). This proposed road pattern and block arrangements do not reflect at all, the current lot or ownership boundaries and accordingly cannot be considered to be a practical plan.
- The practical developable potential of the RIDBC landholding has been severely restricted by the open space and roads indicated on the Draft Precinct Plan. This is neither commercially viable or reasonable and the Draft Precinct Plan should be amended to reduce this impact on the future development of the land.



- The RIDBC landholding is located off Elizabeth Drive, in close proximity to the Northern Road and the future outer Sydney Orbital. In addition, the Draft Precinct Plan indicates a future road connecting the adjoining employment zone to the Airport (See **Figure 4**). The Draft Precinct Plan (overview of the Agribusiness precinct) acknowledges this, referring to the “strong connectivity [of this area] to the rest of the Agribusiness Precinct, the Northern Gateway and North Luddenham across the M12”. The RIDBC landholding is therefore a strategically located site with good connections to the Airport and surrounding road network and it would be appropriately to enable further business and enterprise uses on this landholding.
- The RIDBC landholding is identified as being part of a proposed ‘Neighbourhood Hub’ with the employment zone centre to be located immediately adjacent to the RIDBC landholding (See

Figures 2 - 4). Accordingly, the RIDBC landholding is suitably placed to contribute to and expand on this centre by delivering more appropriate business uses than open space.



In conclusion and on behalf of the RIDBC, we request that the Draft Precinct Plan be amended to reduce the amount of open space and that the alignment of future roads and lots be amended to take into account the lot boundaries and ownership. This will enable this strategically located landholding to better contribute to the Agribusiness precinct by supporting a larger and practical developable area. We otherwise seek clarification on how the economic impact on the RIDBC land from the extent of open space will be addressed and the RIDBC compensated for the loss of developable land.

We again thank the Department for the opportunity to comment and on behalf of the RIDBC, look forward to your advice on how their concerns will be addressed.

Yours sincerely,



Mark Grayson

Director

Knight Frank Town Planning

M: [REDACTED]