

9 March 2021

Our Ref. 21-006

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*

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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 Sydney Society of Model Engineers (SSME), we thank the Department for the opportunity to comment.

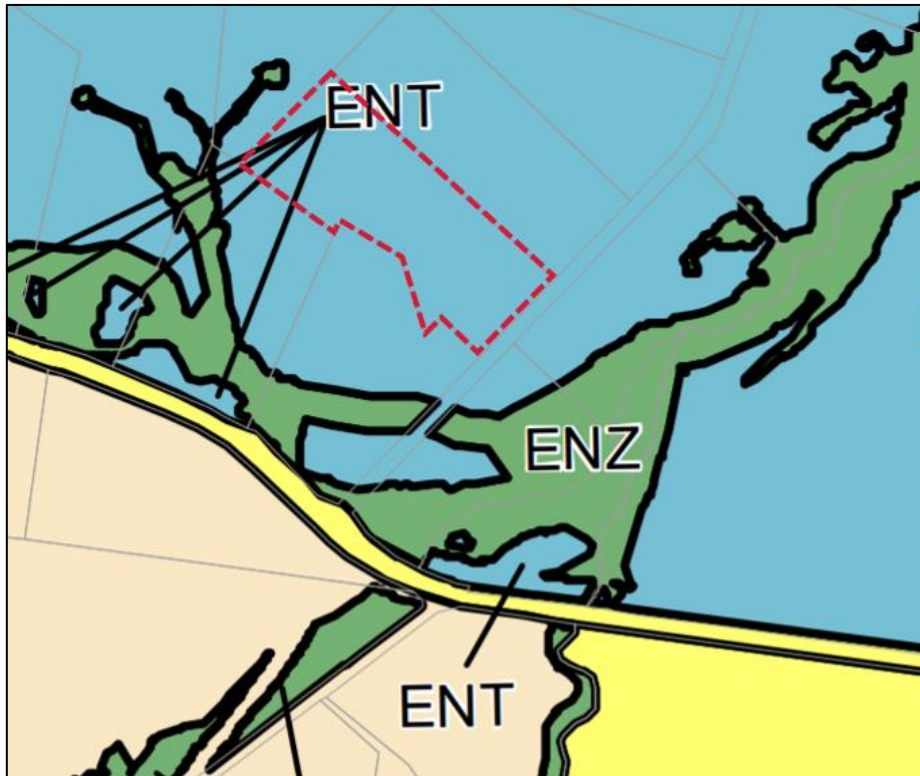
The SSME is the owner of the landholding located at 869-885 Luddenham Road, Luddenham. The landholding is approximately 10 hectares, located off Luddenham Road in close proximity to Elizabeth Drive and The Northern Road. It is legally known as Lot 16 DP209399 and identified as part of the *Northern Gateway Precinct* in the Aerotropolis plans.

The SSME landholding is identified as part of the Northern Gateway Precinct in the Aerotropolis plans. The site is zoned as Enterprise (ENT) within the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (See **Figure 1**).

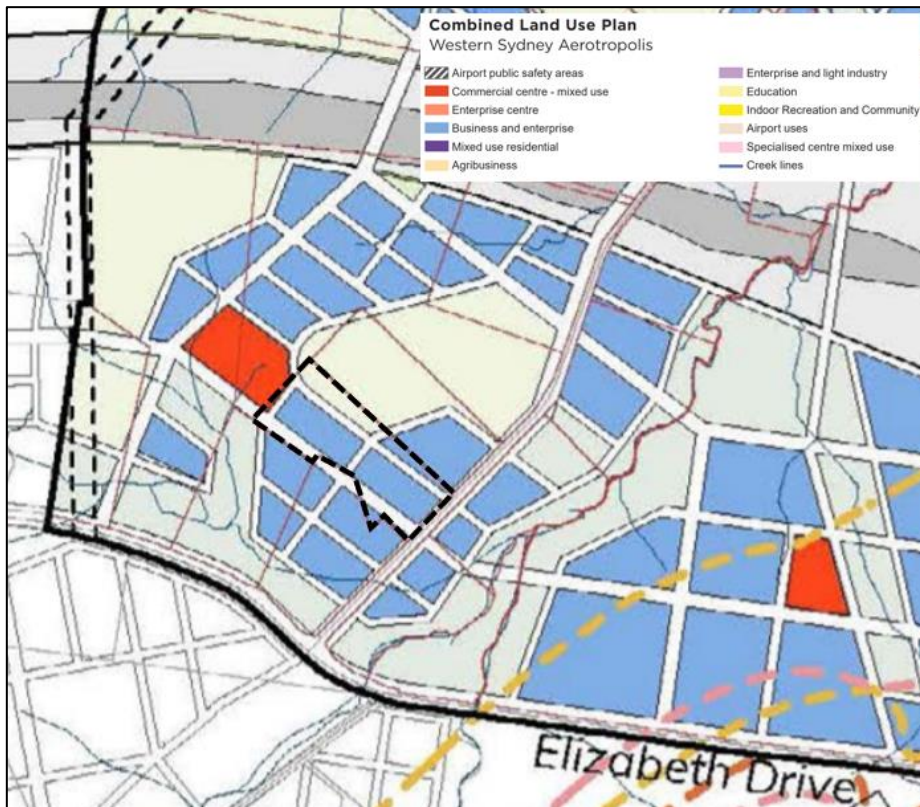
We note the following with regards to the Draft Precinct Plan and the SSME landholding:

- A small portion of the SSME 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 open space on the property should align with the existing lot boundary to provide more certainty around the delivery of this open space.

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 SSME of setting aside that land for open space in the absence of any planning basis. On behalf of the SSME 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?

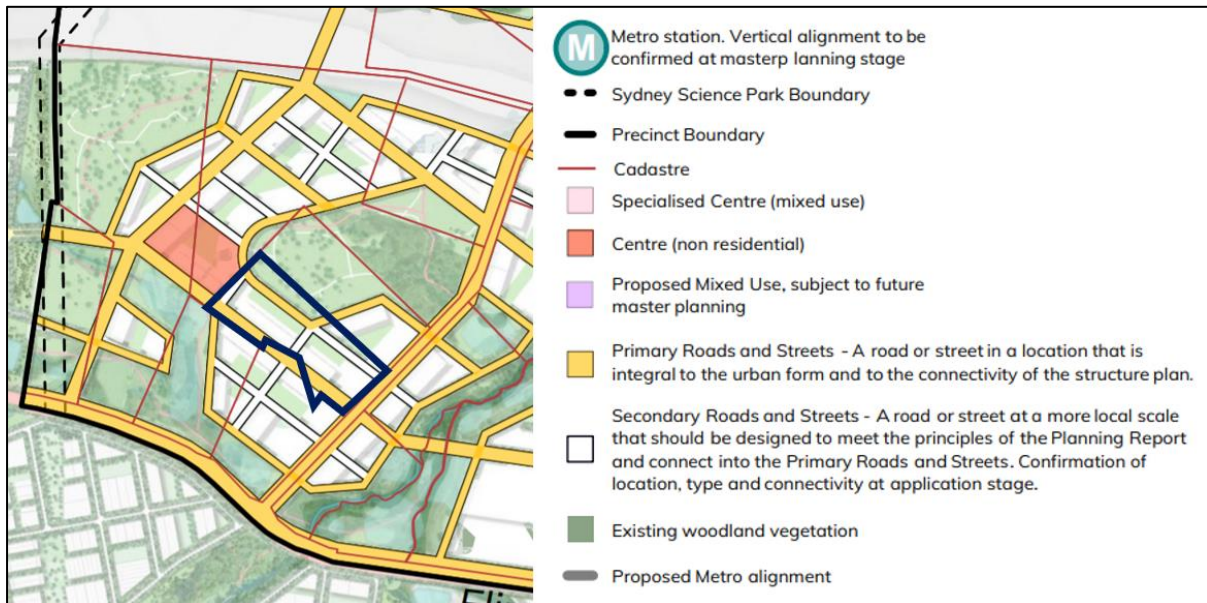


**Figure 1:** Zoning Map (Western Sydney Aerotropolis SEPP)



**Figure 2:** Extract from Precinct Plan – Land Use Plan (DPIE)

- The SSME landholding will be potentially dissected by numerous primary roads and secondary 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. We strongly suggest that with the suggested change of the open space to the existing lot boundaries, the indicative road alignment should also change accordingly.



**Figure 3:** Extract from Precinct Plan – Northern Gateway Layout and Structure Plan (DPIE)

- The SSME landholding is zoned Enterprise in the Aerotropolis SEPP (see **Figure 1**). We note that the combined Land Use Plan in the Northern Gateway Precinct Plan has identified a range of land uses in this zone including commercial centre – mixed use, enterprise centres, business and enterprise, enterprise and light industry and specialised centre mixed use (see **Figure 2**). The Precinct Plan did not elaborate on the specific land uses to be permitted and prohibited in each of these land use areas. Additionally, the Plan did not specify the requirements within each of these areas. On behalf of SSME, we seek clarification on the permitted and prohibited uses on their property.
- The SSME landholding is located off Luddenham Road, in close proximity to Elizabeth Drive, The Northern Road and the future outer Sydney Orbital. The SSME 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 land immediately adjacent to the SSME landholding is proposed to become a mixed use commercial centre excluding residential. The proposed site for this extends over two separate landholdings and is completely reliant on the surrounding landholdings to deliver the primary roads into the centre of the larger block. We note that this location is not going to result in a good planning outcome and viable commercial centre for the precinct. Accordingly, we suggest that a more appropriate location for the commercial centre should be on the SSME landholding with direct access to Luddenham Road and would consequently provide passing trade as well as a more attractive location for business to locate here. Additionally, this would act as a catalyst for surrounding development to occur in the area.

- The SSME landholding is identified as being between two proposed 'Neighbourhood Hubs' with the commercial centre to be located immediately adjacent to the SSME landholding (See **Figures 2 - 4**). Accordingly, the SSME landholding is suitably placed to contribute to and expand on this centre by delivering more appropriate business uses than open space.



**Figure 4:** Extract from Precinct Plan – Centre Hierarchy (DPIE)

In conclusion and on behalf of the SSME, we request that the Draft Precinct Plan be amended to adjust the proposed open space boundary 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 Northern Gateway precinct by supporting a larger and practical developable area. We otherwise seek clarification on the range of permitted and prohibited uses proposed for the business and enterprise zone.

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

Yours sincerely,

**Mark Grayson**  
Director  
Knight Frank Town Planning  
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