

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [PPO Engagement](#)
Cc: planning.exhibitions@planning.nsw.gov.au
Subject: Webform submission from: Western Sydney Aerotropolis Draft Precinct Plans
Date: Friday, 12 March 2021 3:07:26 PM
Attachments: [east-west-land-210312-celestino-submission-aerotropolis-final---submitted.pdf](#)

Submitted on Fri, 12/03/2021 - 15:05

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

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Last name

Scard

I would like my submission to remain confidential

No

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Submission file

[east-west-land-210312-celestino-submission-aerotropolis-final---submitted.pdf](#)

Submission

12th March 2021

Department of Planning, Industry and Environment
Western Sydney Aerotropolis Precincts Submission
Locked Bag 5022,
Parramatta NSW 2124

Please find enclosed our submission on the Western Sydney Aerotropolis Draft Precinct Plan.

Celestino's land holdings span over 490 hectares within the Western Sydney Aerotropolis and we have a longstanding interest in the area. Celestino's western land and the eastern land holdings directly adjoining Sydney Science Park (150 Gates Roads and [REDACTED] Luddenham Road) are located within the strategically important Northern Gateway Precinct and is well positioned to deliver on Government objectives for the WSA.

The enclosed submission relates to the above landholdings, Sydney Science Park submission (separate) and the Draft Precinct Plan. The recommendations are cognisant of the key drivers outlined within the Draft Precinct Plan, while addressing the unique nature of the western and eastern land holdings.

Celestino wishes to thank the NSW Department of Planning, Industry and Environment and the Western Sydney Planning Partnership for the opportunity to make this submission.

If you would like to discuss any aspect of it, or require further information, please contact me.

Yours sincerely

Mat hew Scard
Interim Chief Executive Officer

I agree to the above statement

Yes

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Yours sincerely


Matthew Scard
Interim Chief Executive Officer



SUBMISSION TO PUBLIC EXHIBITION OF WESTERN SYDNEY AEROTROPOLIS DRAFT PRECINCT PLANS

EAST AND WEST LANDHOLDINGS

■■■■ GATES ROADS, ■■■■ LUDDENHAM ROAD

12 MARCH 2021



EXECUTIVE SUMMARY

The Department of Planning, Industry and Environment (DPIE) and Western Sydney Planning Partnership (WSPP) is to be commended on the significant work it has undertaken to develop the Precinct Plan and the strategic planning framework for the Western Parkland City.

This submission relates to land owned by Celestino that is in the Northern Gateway Precinct and directly adjoining Sydney Science Park (**SSP**) to the east (across Luddenham Road) and to the west (towards Gates Road). The submission highlights the opportunity to amend the zoning from Enterprise (**ENT**) to Mixed Use (**MU**). The proposed zoning for the Eastern land is supported by its close proximity (<800m) to the proposed Luddenham Metro Station and is fronting Luddenham Road (key transport corridor). The western land is a logical extension to the current proposed Mixed Use zones proposed for SSP and joining into the Gates Road residential area.

Celestino believes that the above amendments, including general feedback, to the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (**SEPP**) and proposed Western Sydney Aerotropolis Draft Precinct Plans (**Precinct Plan**) is justified based on the following points:

- Changing ENT zone to MU zone is based on land suitability, dictated by ANEC/ANEF 20 aircraft noise contour, proposed Metro station and surrounding land uses. Refer to Proposed Zoning Plan and Sub Precinct Plan included as Appendix A which demonstrates the rationale and key design principles.
- The MU zone to include Dual occupancies, Dwelling houses, Secondary dwellings, and Semi-detached dwellings due to its strategic location adjacent to Sydney Science Park.
- Coordinate road cross sections with that already approved under the Penrith LEP as per Appendix B.
- Remove the Undisturbed Soil Network provisions.
- Amend the SEPP Land Reservation Acquisition Map to include all land proposed to be reserved for public purposes.

Sydney Science Park will be the catalyst for development within the Northern Gateway Precinct, and we would like to work with the Department to ensure the Precinct Plan enables rather than constrains delivery of urban development on the ground and realises the Government's vision for the Western Sydney Aerotropolis (the **Aerotropolis**).

A separate submission has been made for Sydney Science Park.

THE SITES

This submission relates to land owned by Celestino that is immediately adjacent to Sydney Science Park:

- Western Land: [REDACTED] Gates Roads ([REDACTED])
- Eastern Land: [REDACTED] Luddenham Road ([REDACTED])

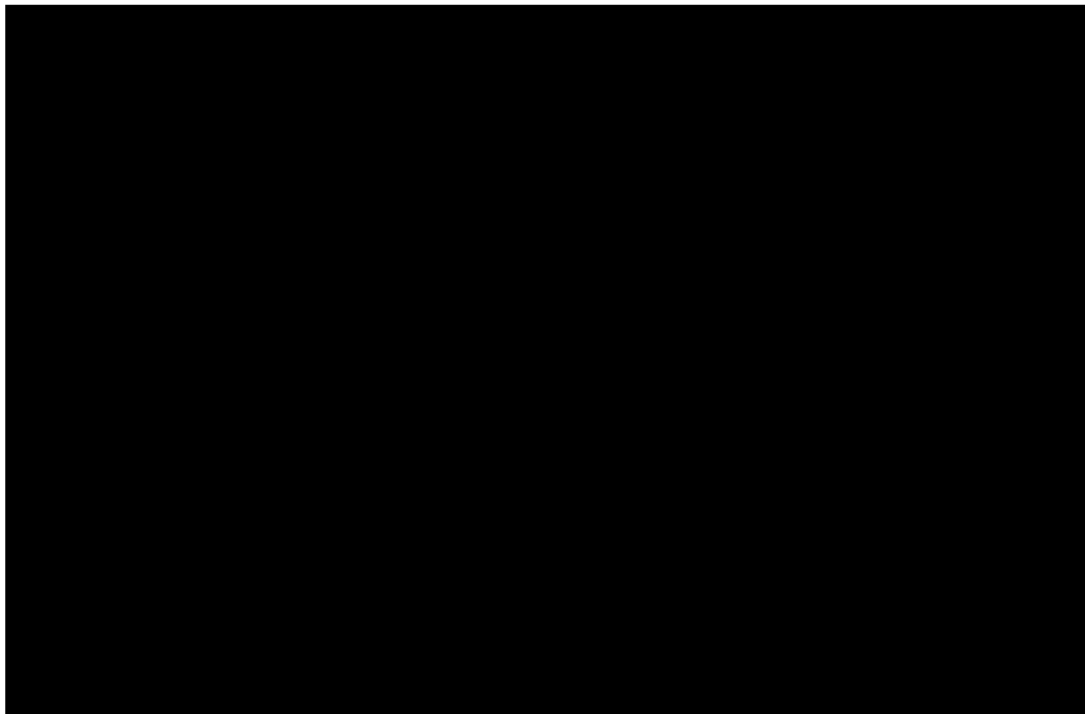


Plan showing the Sydney Science Park and Celestino other landholdings to the west and east

LAND USE ZONING

Eastern Land - Supporting a Genuine Mixed Use Transit Oriented Precinct

The Eastern land is within very close proximity (<800m) to the proposed Luddenham Metro Station and is separated from the existing Sydney Science Park lands by Luddenham Road. As such there is no distinct logic to this land being zoned ENT Enterprise given the close proximity to the Metro Station.



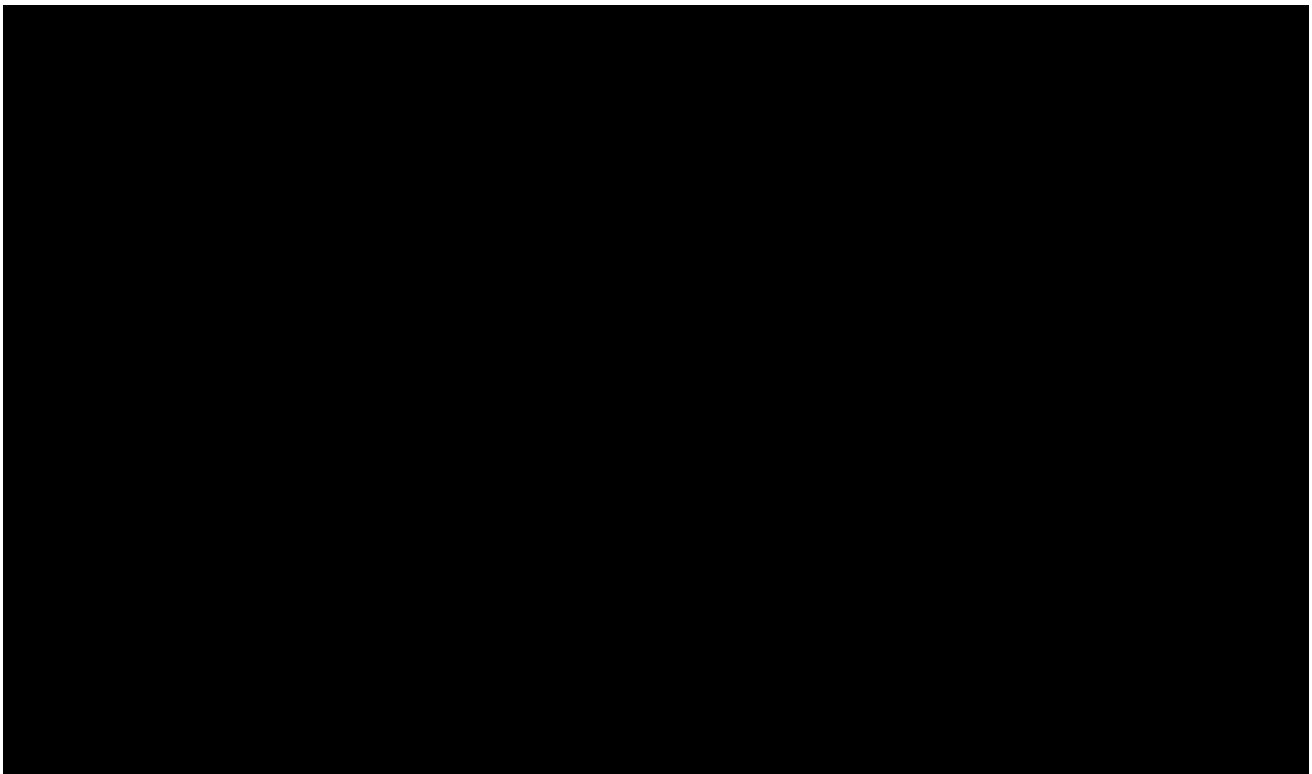
For the East and West landholdings, Celestino have prepared a proposed zoning plan and sub precinct plan to show how the land could be cohesively planned in conjunction with Sydney Science Park (refer Appendix A)

Western Land – Mixed Use Infill Site

The Western land overlaps with land rezoned under the SEPP (purple highlighted section below). In the Northern Gateway Precinct Plans this land is zoned ENT Enterprise and ENZ Environment and Recreation. The western part of Lot 1 falls outside the zoned part of the Aerotropolis and remains zoned RU2 Rural Landscape under the provisions of Penrith Local Environmental Plan 2010 (the LEP). This land is in the North Luddenham precinct within the Aerotropolis (subject to future Precinct Planning).

The Sydney Science Park submission (separate to this submission) is recommending the ENT zone on the western boundary of SSP in the Northern Gateway is amended to a Mixed Use zone. The reasons to support this are based on best practice urban design principles. The Western land continues this logic as the land is within close proximity to a proposed local centre in the draft Precinct Plans for Sydney Science Park (SSP) and would connect to the existing residential land to the west at Gates Road.

The inclusion of residential land uses is critical to achieving this vision and for this reason Celestino requests that the western lands be rezoned as MU Mixed Use, permitting a mix of residential as well as business land uses that are essential in the delivery of a connect and vibrant new precinct with Sydney Science Park.



Plan showing the east and west landholdings relative to the Northern Gateway Precinct Plans.

Permissible Uses

Whilst a range of residential land uses is permitted in the MU zone there are notable exceptions; Dual occupancies, Dwelling houses, Secondary dwellings, and Semi-detached dwellings are prohibited. A mix of residential dwellings is important to ensure the non-residential uses are viable.

Celestino appreciates that the vision for the Aerotropolis is one of significant density. Whilst this represents the ultimate vision for the urban form, the exclusion of lower density forms of housing does not consider the natural order of delivering on development outcomes, which would see lower density forms initially and in the short term ultimately replaced by higher density forms in the future. Permitting lower density development in the first instance is an important first step towards activating development of the Precinct and in building developer, consumer, and community confidence.

Lower density residential is an appropriate design response in locations that are geographically distant from key amenity, particularly the proposed Luddenham Metro Station, in accordance with accepted principles for urban design and structure.

A FLEXIBLE AND RESPONSIVE PLANNING FRAMEWORK

The Precinct Plans must clearly recognise and articulate that flexibility is expected and encouraged to achieve best practice urban design and structure outcomes that respond to individual site constraints and opportunities.

Whilst the provisions within the Precinct Plans are likely to be considered flexible by the Department and subject to the outcomes of detailed design, experience suggests that Councils will apply these standards rigidly, with little scope for deviation. This has been the case with the Indicative Layout Plans in the Western Sydney Growth Areas. Rigid planning pathways add time and cost to the approval process.

The draft Precinct Plans should therefore include provisions that go further than the existing Growth Centres provisions as they require the relevant planning authority to assess and approve variation based on its merit.

Furthermore, Celestino understands that the final Precinct Plans will be accompanied by a SEPP amendment that amends the current zoning boundaries and identifies land to be acquired for public purposes.

A mechanism whereby land that is identified for a public purpose that is surplus to needs because of further understanding through detailed design analysis would avoid Planning Proposals for insignificant spot rezonings.

CONSISTENT AND WORKABLE PRECINCT PLAN CONTROLS

Our analysis reveals that there are inconsistencies between controls that contradict each other. We therefore respectfully submit that the inconsistencies between controls should be corrected through rigorous design testing and that the Precinct Plans should clearly indicate that controls are guidelines rather than prescribed outcomes.

URBAN FORM

Transport Corridors Map

The Structure Plan does not align with SEPP Transit Corridors Map. Luddenham Road is shown to be widened on this map with land acquired from both sides of Luddenham Road however the Precinct Plan indicates land widening acquisition only on the western side of Luddenham Road.

Road Cross-Sections

As Celestino is responsible for the delivery of the whole of the MU Mixed Use zone in the Northern Gateway Precinct we have prepared proposed road cross sections. These are based on and achieve the objectives in the draft Western Sydney Street Design Guidelines and are included at Appendix B.

Celestino considers these to be an appropriate design solution for the whole of the MU Mixed Use zone within the Northern Gateway Precinct as the land uses in this zone will have different needs to the ENT Enterprise zone.

IMPACT ON DELIVERY

Masterplanning Guidelines

The Masterplanning Guidelines set out a process to amend a Precinct Plan. The SEPP makes provisions for this process subject to the Masterplan being consistent with the Precinct Plan and the Development Control Plans.

We note the Western Sydney Aerotropolis Development Control Plan (DCP) Phase 1 has been finalised however the content is largely a range of vision statements and performance outcomes. Phase 2 is yet to be exhibited and is expected to include more detailed development controls. Celestino believes it is fair and reasonable to re-exhibit the Masterplanning Guidelines and the Phase 1 and 2 DCP's together.

Undisturbed Soil Network

The Precinct Plan indicates part of the site mapped as Undisturbed Soil Network however the land has been used for generations for agriculture thus the soil is significantly modified and is very unlikely to be undisturbed.

Appendix C illustrates the Undisturbed Soil Network has across the whole of the Sydney Science Park site including the subject sites. Also included is a cross-section showing the likely interface between the riparian and developable lands cognisant of the constraints on development.

Changing the use of the land from rural to urban land uses requires significant recontouring and regrading of both the land and the watercourses within the landscape. This is a critical process for future amenity to enable gradients to be achieved to support accessible, walkable neighborhoods and for the performance of infrastructure that supports urban development such as roads and drainage which is critical for the urban landscape to function. The design, construction, and ecological limitations when applying the proposed undisturbed soil networks will be significant. The Undisturbed Soil Network principles do not support and significantly hinder the project viability and the realisation of the Governments Aerotropolis vision:

- The soils within the landscapes of Western Sydney are generally of poor quality. Historical agricultural uses have further impacted soil quality. The revegetation of the landscape, consistent with the Aerotropolis vision, will require soil structure modification and nutrient improvement to support significant vegetation cover. The retention of the existing soil profiles and levels mean that the desired ecological outcomes for the project will not be achieved.
- The existing ground levels and topographic form is not conducive to urban development. Basic engineering road design principles and road safety requirements, including requirements for road gradients under Austroads Guide to Road Design road user safety outcomes, conflict with the Undisturbed Soil Network requirements. Recontouring of the land is paramount to ensure road design levels appropriately transition with future open space. If this transition is not permitted within the future open space, there is a likely loss of additional developable land due to the transition requirements between riparian corridors and interfacing roads prescribed by the Undisturbed Soil Network.
- The riparian corridors require regrading to perform drainage functions. At its most basic level, if the riparian corridor cannot be regraded, then the drainage function will not work. The retention of the existing soil profile and levels and the riparian corridor form impacts the viability of the design and construction of trunk drainage and impacts on 1:100-year flood levels and extent resulting in the further loss of developable land.
- As a result of the existing site constraints Sydney Science Park is likely to rely on imported material for filling rather than a cut/fill balanced approach.
- Regrading the entire area with associated recontouring of riparian corridors is required to enable the delivery of quality open space amenity with accessibility and walkability as key principles to align with the vision for an all-inclusive and walkable city.

Except for areas identified for conservation it is reasonable and should be expected that the land will be subject to significant regrading and recontouring to enable development to occur and to enable suitable grades for utility servicing and accessibility.

ACQUISITION CONSIDERATIONS

The Land Reservation Acquisition Map under the SEPP does not identify land to be acquired for road (Luddenham Road and M9), drainage, open space, or community infrastructure. To ensure that there is a mechanism by which Council, or State Government and its agencies can acquire these lands the SEPP map needs to be amended to reflect the detailed planning for the Precinct. Identification of the full extent of lands to be acquired for a public purpose underpins the appropriate valuation of land and is essential to providing certainty to existing landowners and the private sector who the NSW Government is relying on to achieve the Western Parkland City vision.

RECOMMENDATIONS AND NEXT STEPS

The Department is to be commended on the significant work it has undertaken to develop the Precinct Plan and the body of planning work to date.

Celestino makes the following specific recommendations to assist the finalisation of the Precinct Plan and to help achieve Governments vision for the Western Parkland City:

Amendments to the SEPP:

- Amend the Western ENT Enterprise Zone to MU Mixed Use zone beyond the current SSP western zoning boundary to the western edge of the Northern Gateway western boundary;
- Amend the Eastern ENT Enterprise Zone to MU Mixed Use zone for the eastern land within 800m of the Luddenham Metro Station
- Expand the range of permissible residential land uses in the MU Mixed Use zones to include Dual occupancies, Dwelling houses, Secondary dwellings, and Semi-detached dwellings; and
- Amend the SEPP Land Reservation Acquisition Map to include all land proposed to be reserved for public purposes.

Amendments/Considerations to the Precinct Plan:

- Amend the Precinct Plan Structure Plan to align roads and street blocks with existing land ownership and ultimate zone boundaries;
- Adopt the Celestino road cross sections for the Northern Gateway Precinct MU Mixed Use zone; and
- Remove the Undisturbed Soil Network provisions.

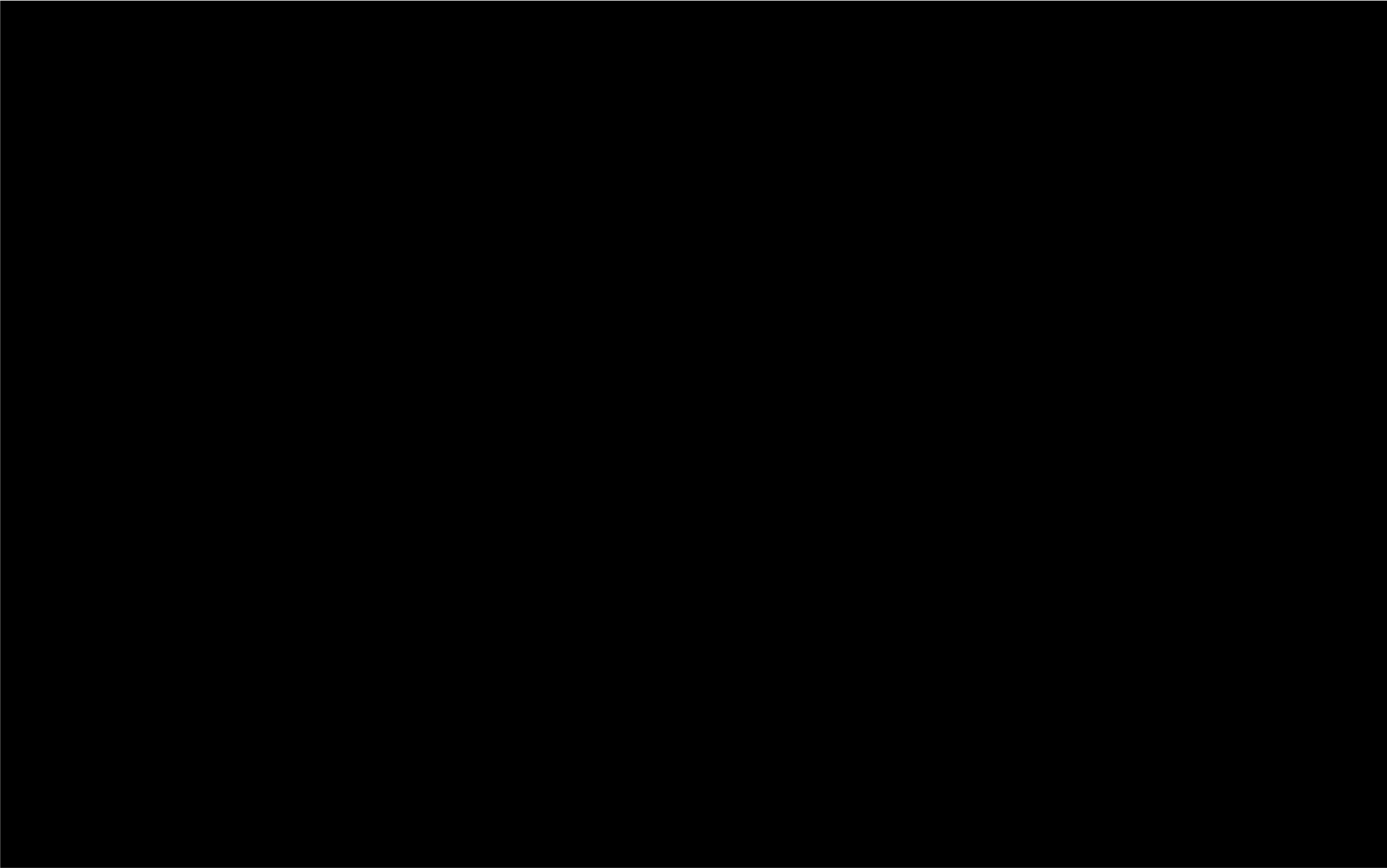
Other Recommendations

- Re-exhibit the Masterplanning Guidelines and the Phase 1 and 2 DCP's together.
- Review the North Luddenham Precinct Plan with the intent for Mixed Use zone between Sydney Science Park and Gates Road. Refer Appendix A for the Structure Plans.

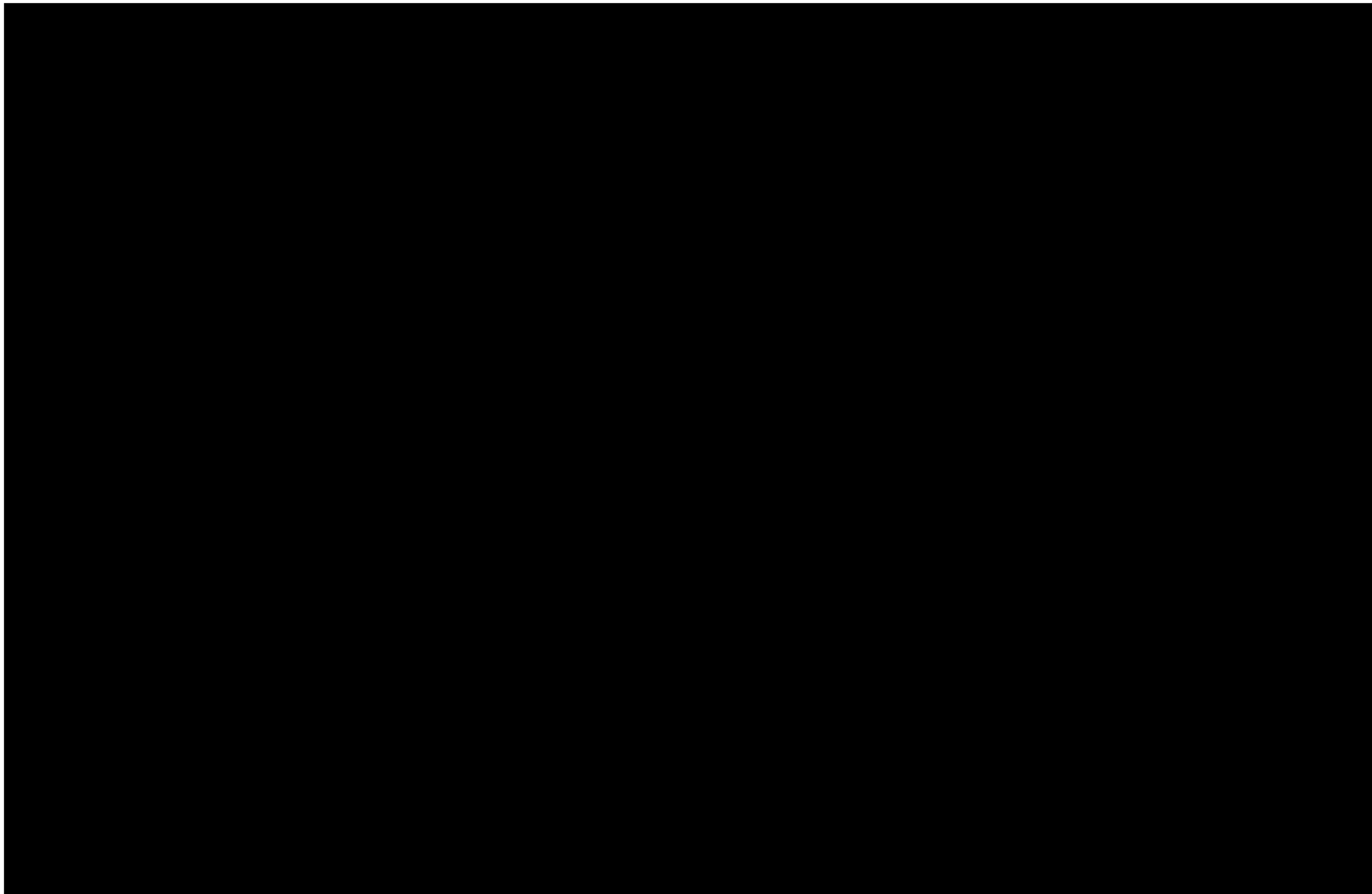
As Sydney Science Park is the catalyst site for the development of the Northern Gateway Precinct and was zoned for urban redevelopment prior to any other land of scale within the Aerotropolis it presents a unique opportunity to deliver on the vision for the Western Parkland City.

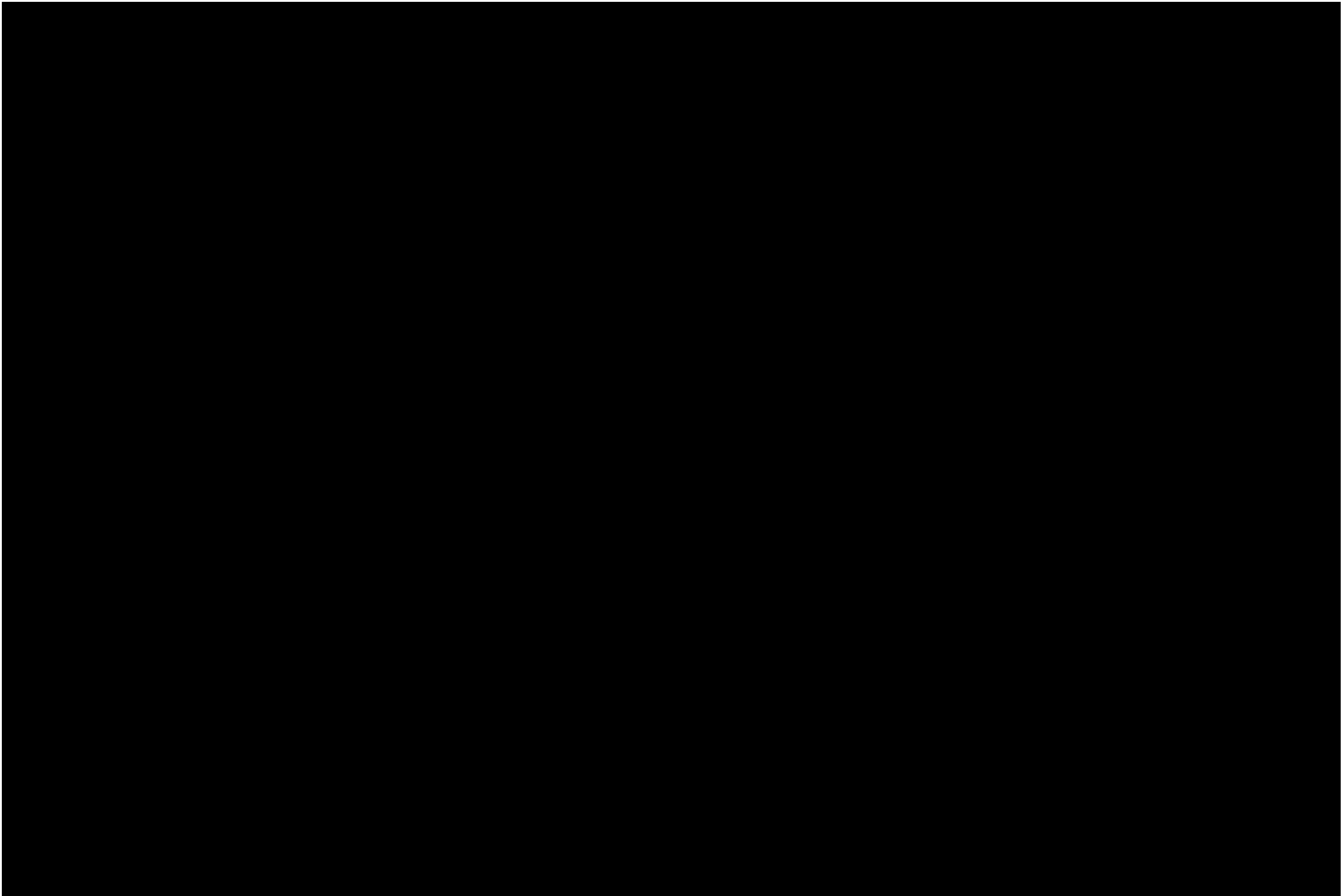
We trust that this submission is beneficial to the Department in your consideration of the strategic planning for the Western Sydney Aerotropolis. We would welcome the opportunity to discuss this opportunity further with the Department.

PROPOSED ZONING PLAN

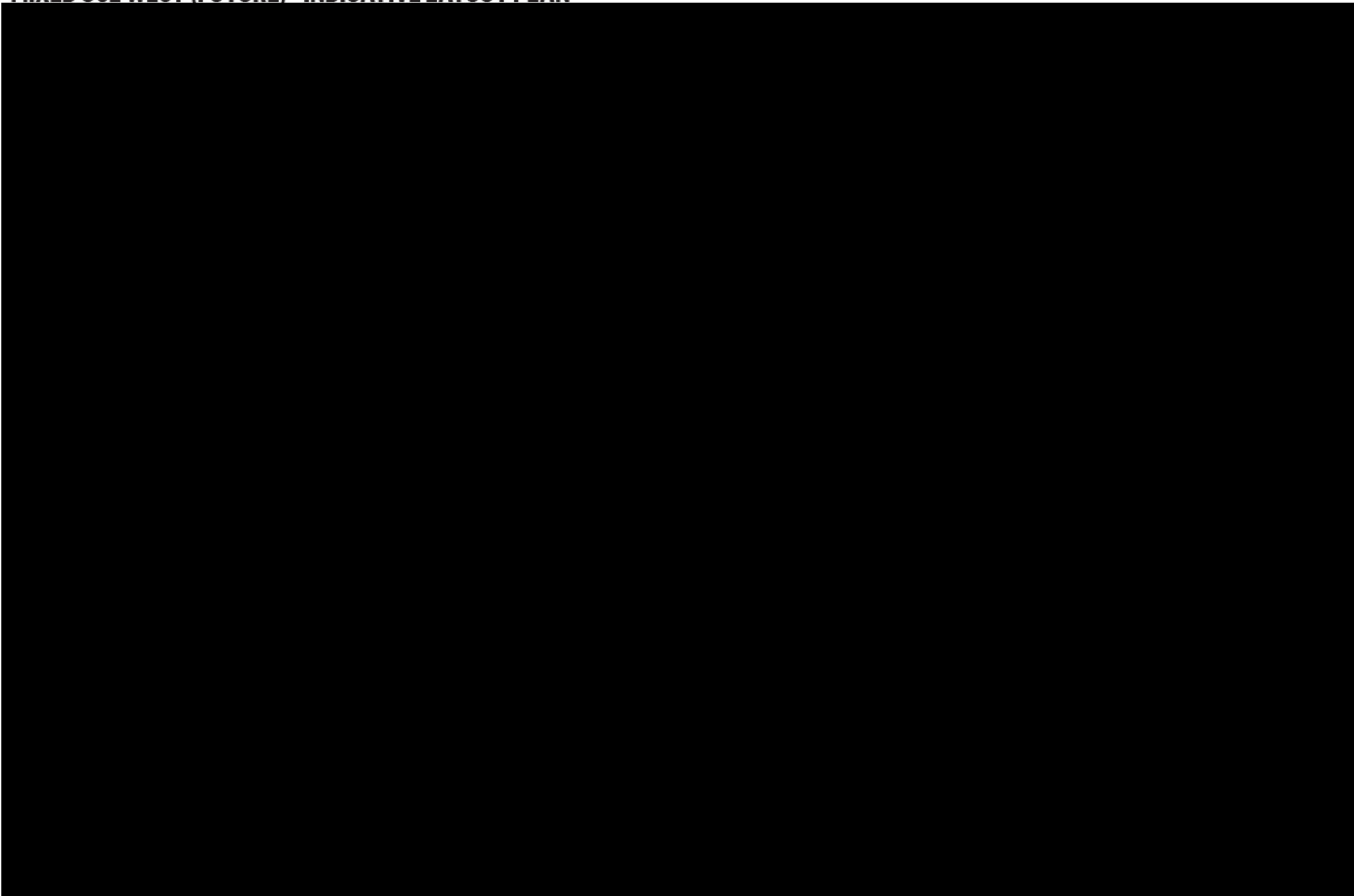


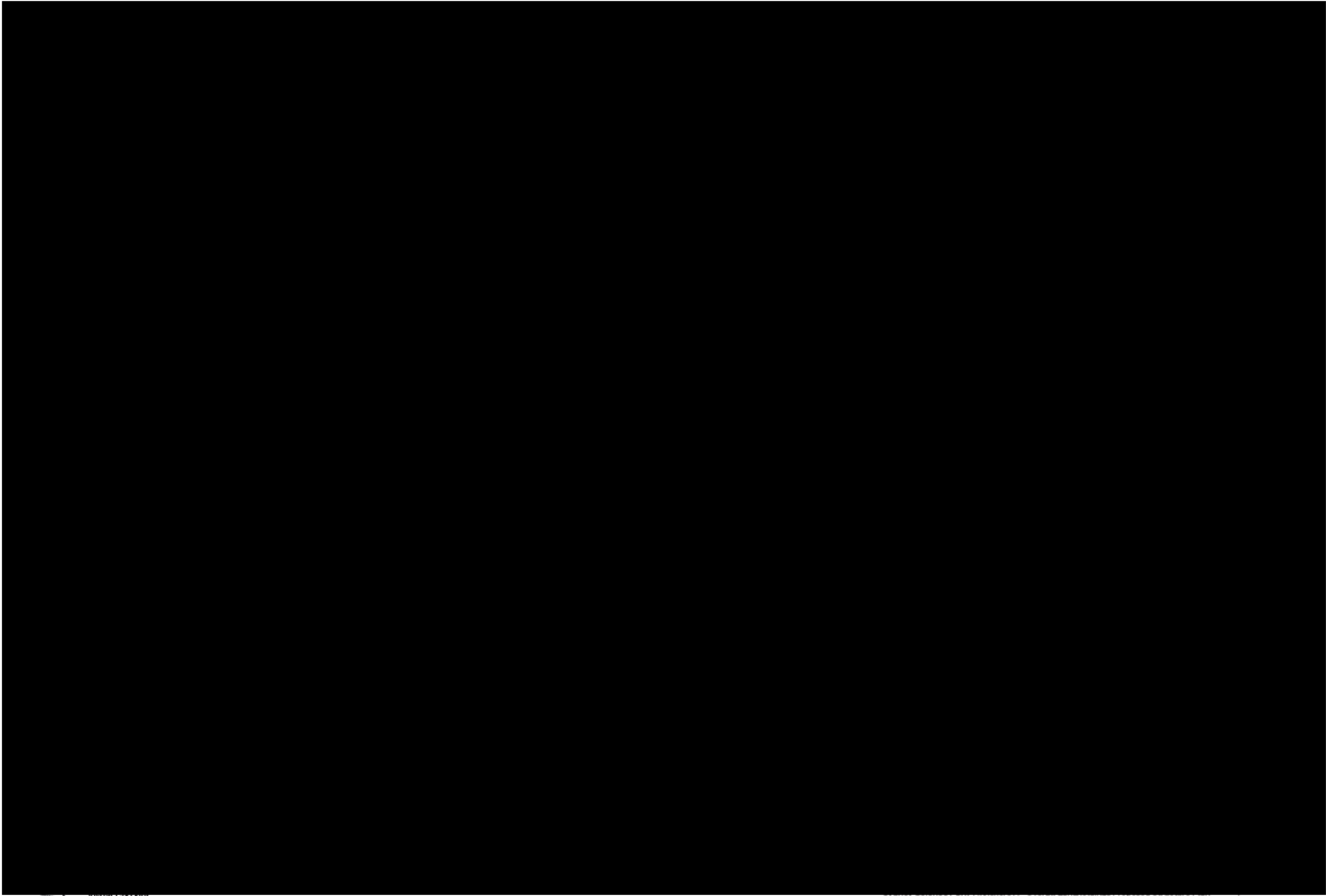
PROPOSED SUB PRECINCT PLAN





MIXED USE WEST (FUTURE) - INDICATIVE LAYOUT PLAN

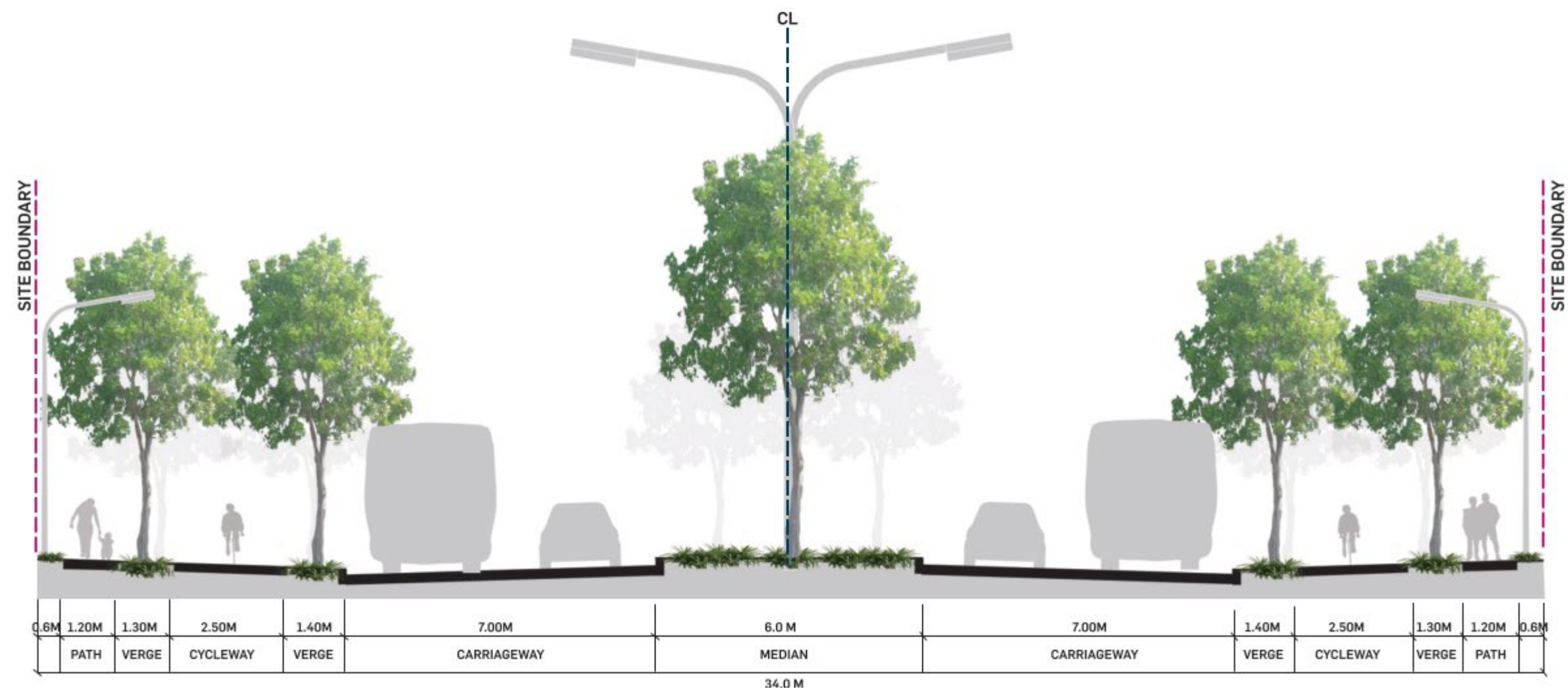


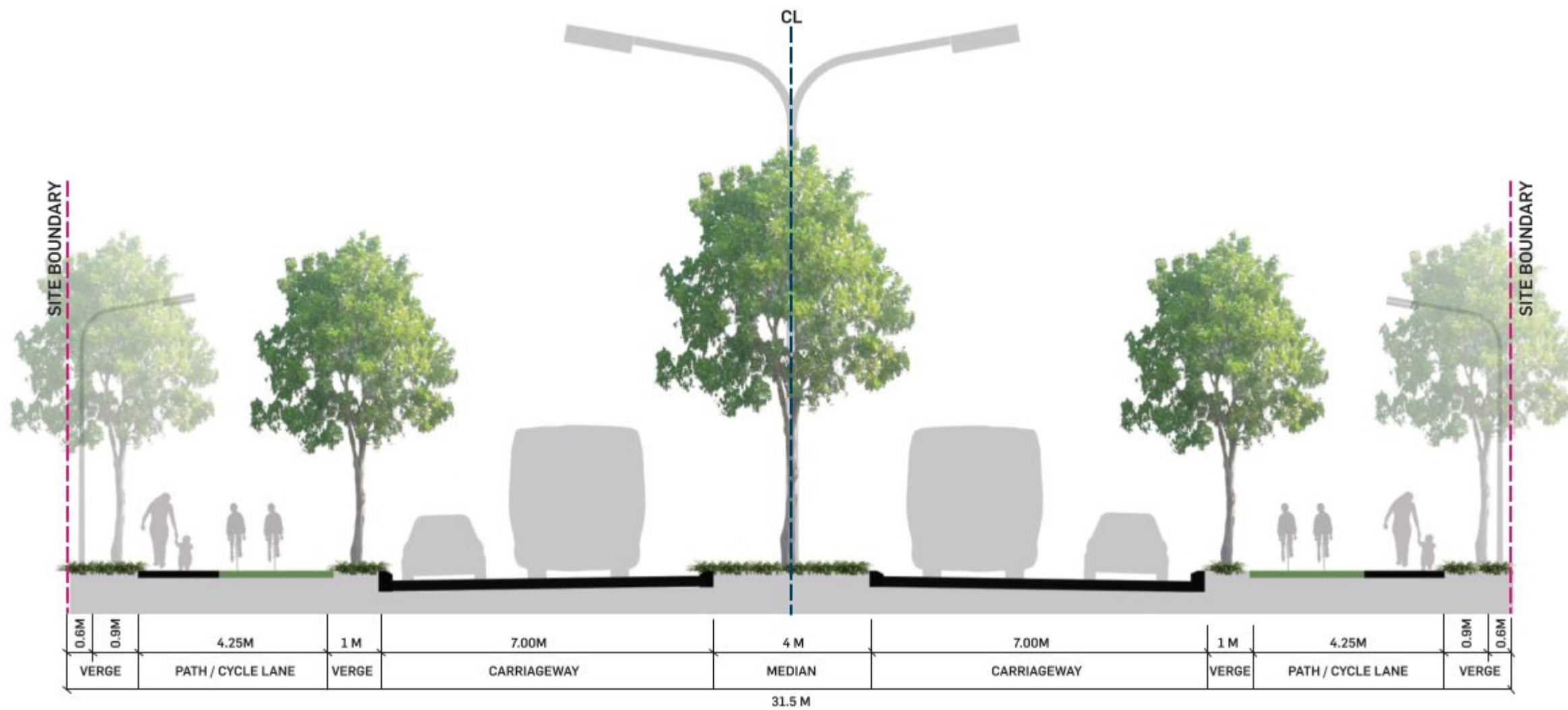


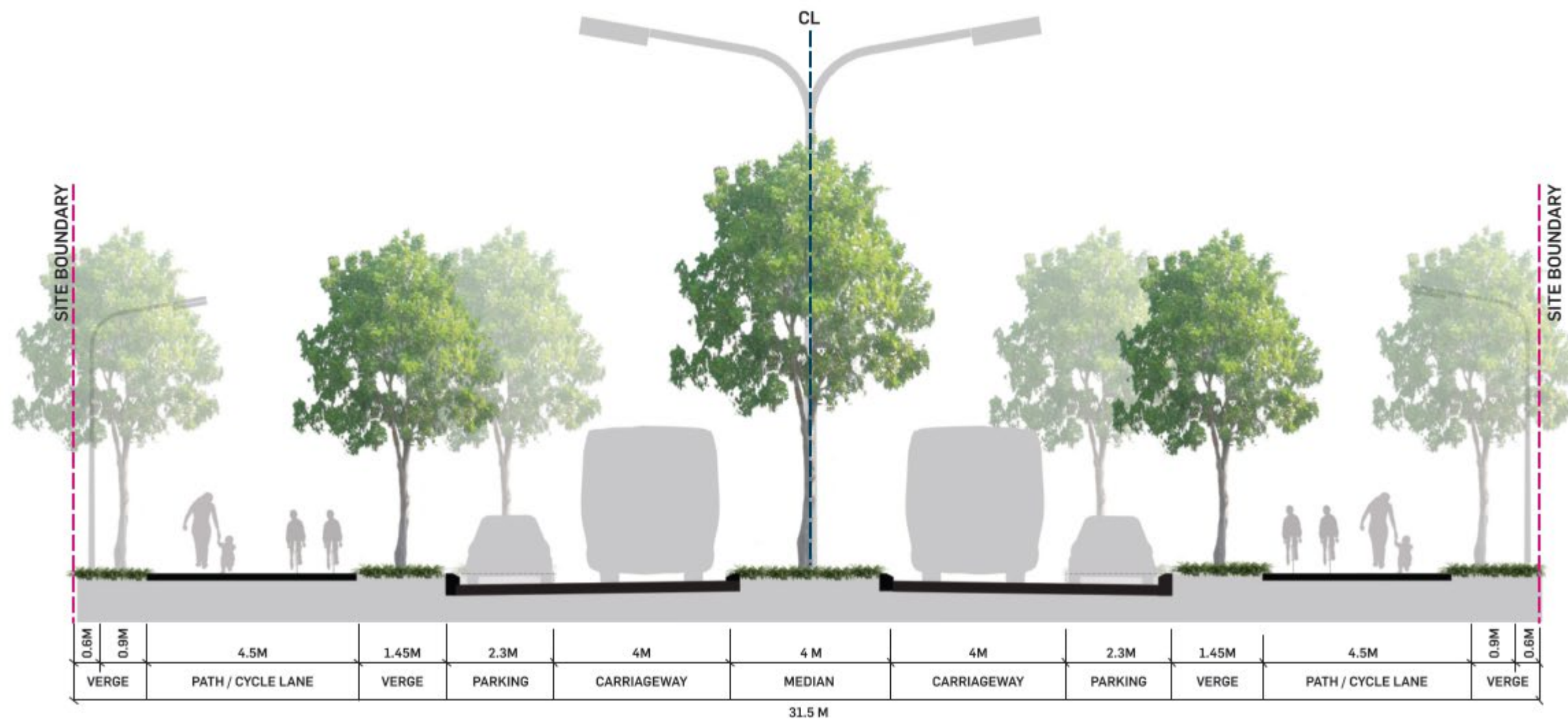
Visual Corridor

APPENDIX B – PROPOSED ROAD CROSS SECTIONS

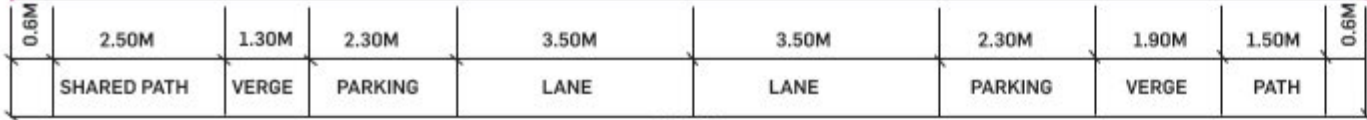
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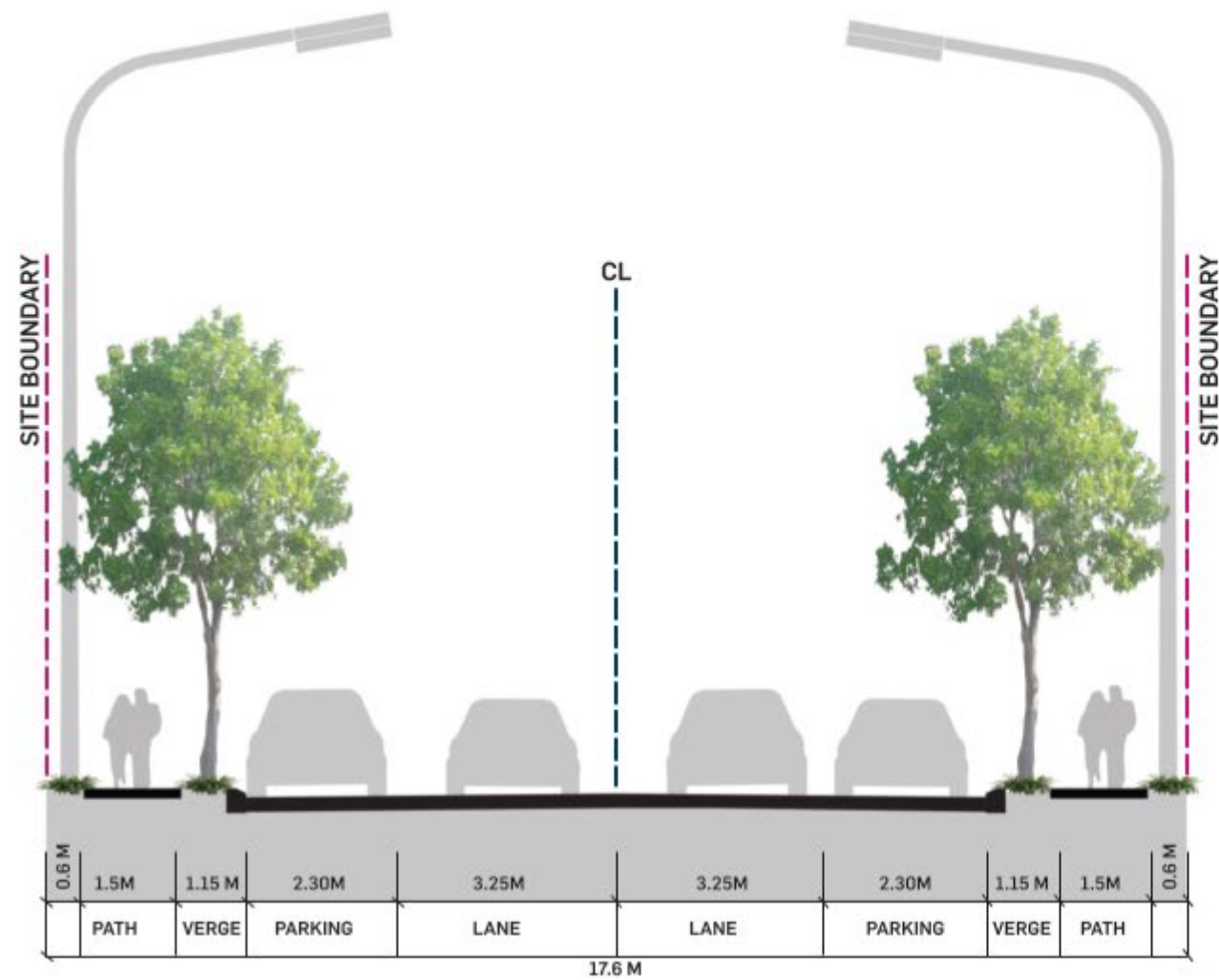


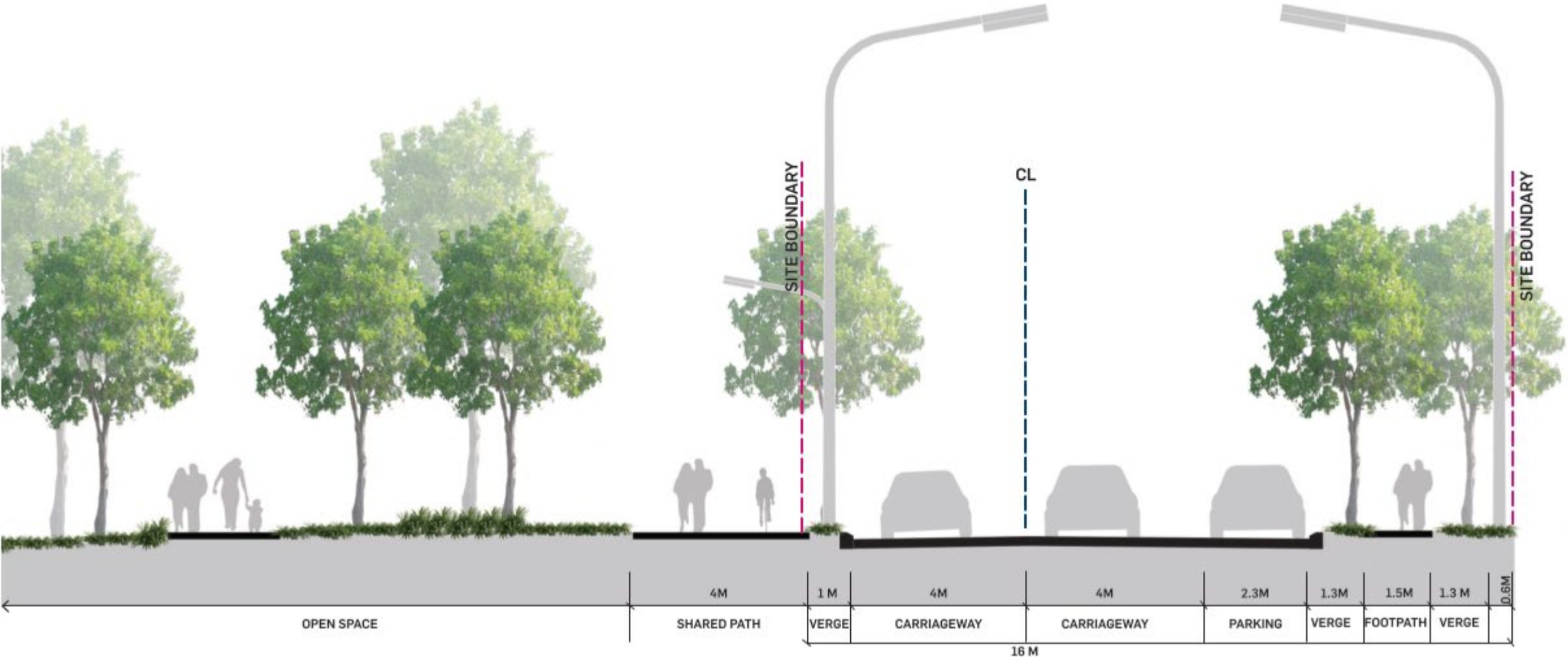


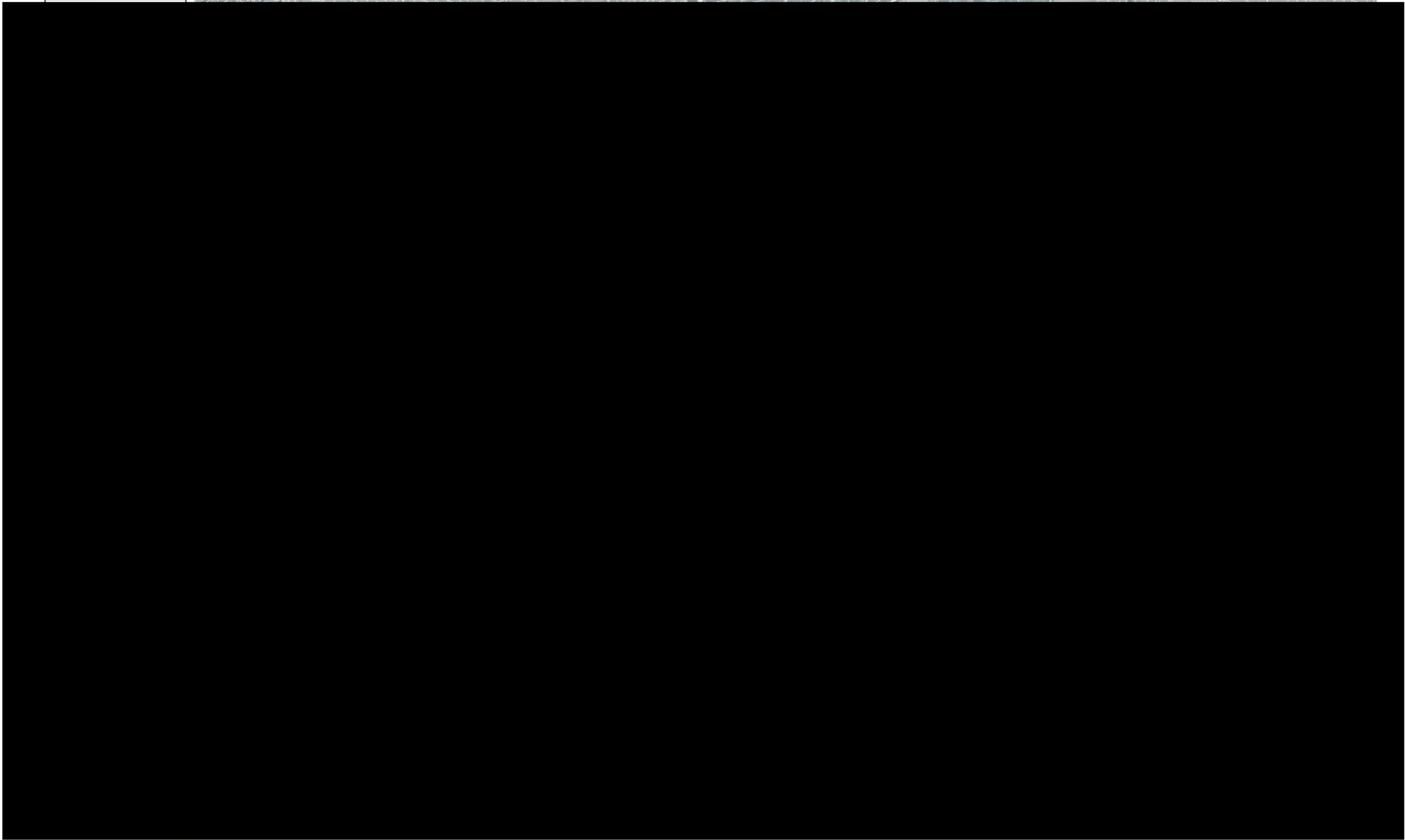


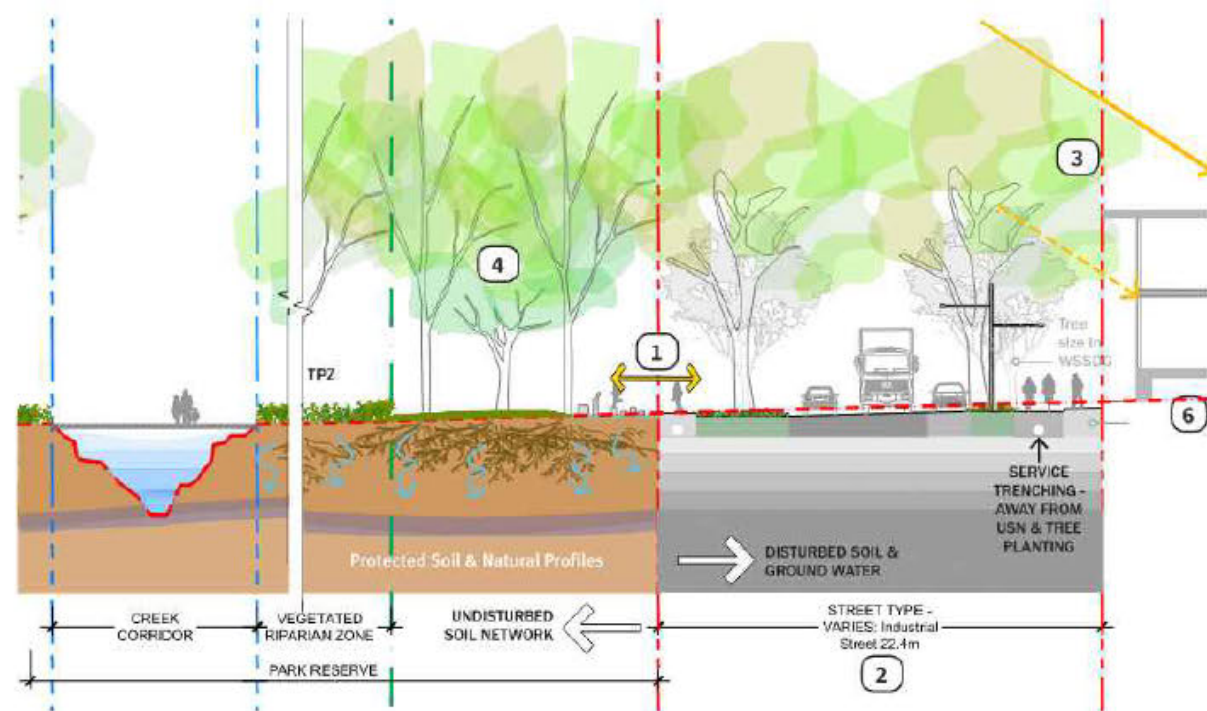
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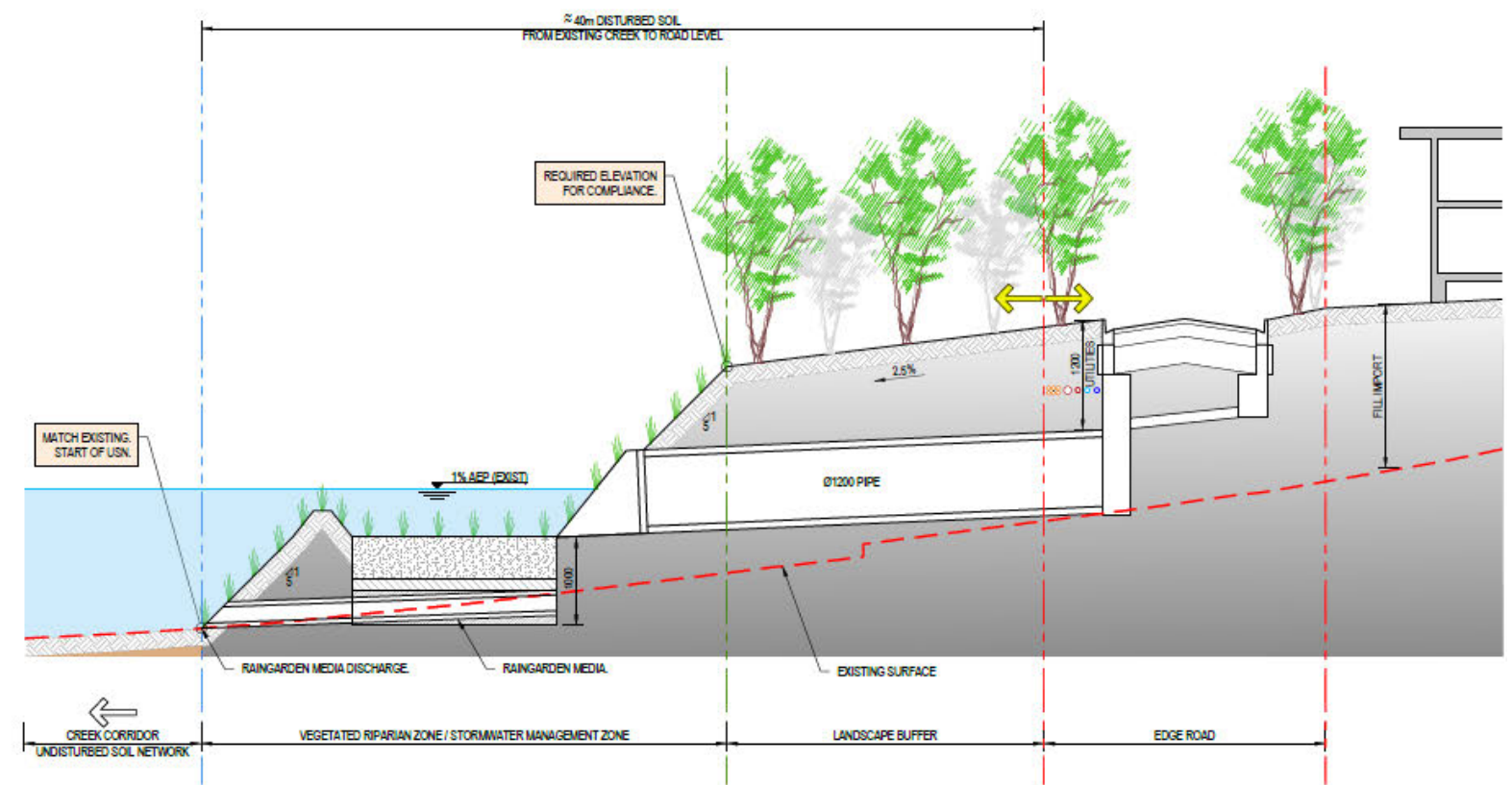








NOTE:
CONCEPT IS AN EXTRACT FROM THE DRAFT NORTHERN GATEWAY URBAN
DESIGN AND LANDSCAPE REPORT, WESTERN SYDNEY PLANNING
PARTNERSHIP, OCTOBER 2020.



NOTE:
SECTION DERIVED FROM THE DRAFT URBAN DESIGN AND LANDSCAPE REPORT
APPLYING INDUSTRY COMPLIANCE REQUIREMENTS FOR FLOODING,
RAINGARDEN DESIGN, STORMWATER CONVEYANCE AND UTILITY DESIGN.