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**To:** [PPO Engagement](#)  
**Cc:** [planning.exhibitions@planning.nsw.gov.au](mailto:planning.exhibitions@planning.nsw.gov.au)  
**Subject:** Webform submission from: Western Sydney Aerotropolis Draft Precinct Plans  
**Date:** Friday, 12 March 2021 3:29:20 PM  
**Attachments:** [lpa-submission-regarding-the-draft-western-sydney-aerotropolis-plan-march-2021.pdf](#)

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Submitted on Fri, 12/03/2021 - 15:27

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

**Name**

**First name**

Patrick

**Last name**

Darley-Jones

**I would like my submission to remain confidential**

No

**Info**

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Luddenham, NSW 2745

**Submission file**

[lpa-submission-regarding-the-draft-western-sydney-aerotropolis-plan-march-2021.pdf](#)

**Submission**

Please see the attached submission.

**I agree to the above statement**

Yes

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***Luddenham  
Progress  
Association inc.***

**The Northern Road.**

**LUDDENHAM 2745**

12<sup>th</sup> March 2021

Dear Sir/Madam,

Re: draft Western Sydney Aerotropolis Plan (WSAP).

This submission is made by Luddenham Progress Association, which is a community forum representing residents of Luddenham and is located within the area designated as the Agriculture and Agribusiness Precinct within the Aerotropolis zone in the draft WSAP.

We believe that finalisation of the precincts and the permissible use of properties within the precincts be delayed until an official enquiry is undertaken to report on the efficacy of this report along with further consultations and assessments. Our reasons are as follows.

1. While we support the Agriculture and Agribusiness Precinct and believe it is important for the success of the Aerotropolis and Western Sydney Airport we consider there has been insufficient and/or erroneous detail included in the proposal. Due to this lack of detail, there has been inadequate assessment of the impacts of some of the proposed planning on the people and properties affected in the government sponsored WSAP.
2. The plan does not “enhance and protect the character and history of the (Luddenham) Village” as it professes, which if it did, would include its ongoing viability as a sustainable residential area. In our presentation to the Listening Panel in February 2020 we identified on page 8 the benefits Luddenham brought to the WSA and Aerotropolis, on page 3 we had already identified how Luddenham had been run-down due to the loss of population caused by the land acquisitions for both the WSA and necessary infrastructure, we recommended this loss of population needed to be reversed if businesses were to survive and flourish and so ensure Luddenham continued to help in the success of the WSA and the Aerotropolis. We identify in the WSAP that the report failed to include our recommendations on this matter and call on this to be corrected.
3. Based on census data we estimate the population of Luddenham village to be about 925 persons, (Luddenham also includes Twin Creeks and other rural locations which are outside the Agribusiness Precinct). Given the average census household size of 3.17 persons this equates to about 250 houses in Luddenham village. We note on page 33 of the Technical Report Summaries for the Draft Aerotropolis Precinct Plan that the following population and dwelling projections are made for the Agribusiness Precinct – Luddenham township essentially covers most, if not all, of the Agribusiness Precinct. The projections are:-  
2036 – 3,319 people and 1288 dwellings  
2056 – 3,800 people and 1476 dwellings.  
Based on these figures the population in the Agribusiness Precinct is projected to grow by 2,394 people, i.e. this is close to 260% growth in 16 years.  
We have one fundamental question to ask, where are these extra approximately

2,400 people going to live since the draft WSAP shows no extra domestic dwelling sites in the village other than the about 250 in existence now and your plan is to reduce the number of dwellings in the village.

In our presentation to the Listening Panel we identified land within the Agribusiness Precinct that should be identified as land available to build domestic dwellings, this was shown on page 10 of our presentation. We call for this anomaly of missing domestic building sites to be corrected so as to ensure Luddenham continues to help in the success of the WSA and the Aerotropolis.

4. We are concerned generally about the lack of detail contained with the current proposal which has created significant levels of uncertainty regarding the future viability of Luddenham Village as a continuing residential option due to the uncertain viability of the utility of land within the Luddenham Village and its immediate surrounds. Equally we are highly concerned about the “over” inclusions of levels of details for the roads, streets and block sizes for the Agribusiness Precinct. Nowhere within the WSAP is there a Development Strategy where businesses, processes, their opportunities or operations are identified and with this being the case how can the roads, streets and block sized be detailed as they have been in the plan. For example, a small logistics advisory office may only need a block size of say 500 square metres while a major processing and packaging operation may need a minimum of say 2 acres of land. The inclusion of green corridors in this detailed layout only makes this all the more pointless. We point out that the WSAP is not a development strategy and that all the details you have included should be removed – much more practical for “zones” within the Agribusiness Precinct to be identified within containing borders and each to be marked up as “Greenfield Sites”, e.g. Greenfield site 1, Greenfield site 2, etc., and all other detail to be omitted. We call for the WSAP to be amended accordingly.
5. There is a statement that intensification of noise sensitive development within the ANEC 20 and above contours will not be permitted once the WSAP comes into operation. This relates to most of the Luddenham Village area. Many blocks within this precinct which are currently used principally for residential purposes are sufficiently large to enable either subdivision or the addition of an additional residence such as a “granny flat” construction on the property. What does the term “noise sensitive development” actually mean? Some developments that may or may not be limited by this restriction may include, subdivision, new granny flat, the addition of extra bedrooms and living space to an existing residence, but without clearer definition it is uncertain and people are unsure as to the true value of their property as there is no certain how the properties may be utilised. More explanation as to the reach of this provision needs to be included.
6. We cannot understand why you have recommended the Agribusiness Precinct be developed in 3 stages. Given that there is no Development Strategy for the Agribusiness Precinct we see no practical application to develop it in stages, it is our contention that the Agribusiness Precinct, Luddenham Village should be developed as a whole in a contiguous order that fits with business needs and supports the broader Aerotropolis. We wish to see this reference to a staged development of the Agribusiness Precinct, Luddenham Village removed from the WSAP.
7. Some of the currently zoned residential properties have been rezoned green space and others within the ANEC 20 and above contours will not be permitted to develop

residentially because of the restrictions mentioned in the previous point, as they have no existing development application in place, and therefore will not be able to be developed for residential as they could currently. There is no mention of any replacement residential development within the area to replace these residential losses to ensure the ongoing viability of the Village. Some areas north of the village bounded by the exist and new Northern Roads would be ideal for this purpose as they are out of the ANEC 20 contours, however these appear to be dedicated to the Agribusiness classification or greenspace. Why isn't this being allowed as an off-set to the lost areas of currently permitted residential development?

8. The WSAP refers to Luddenham Village as a part of the regional tourism network within the broader community, with its historical elements being revitalised to meet the needs of the existing and emerging community. There is no detail of exactly what these statements mean and exactly what it is that is going to foster an "emerging community" within Luddenham that would utilise any of its historical elements. There is concern amongst Luddenham Village residents that under the proposals of the Precinct Plan, that the future viability of the Village is under threat. We are astounded by the mention of tourism in the Agribusiness and fail to identify any property or feature that would attract a visitor. Indeed, Invest NSW, who exist to attract business to NSW makes no mention of tourism being an opportunity for the Agribusiness Precinct. The major tourist attraction identified for western Sydney is the Blue Mountains and while visitors will indeed use WSA to arrive in Australia there is currently no attraction here to encourage them to visit here. We contend the references to tourism in the Agribusiness Precinct is nothing more than an exaggeration of a vivid imagination and call for all tourism references within the Agribusiness Precinct to be removed as they merely distract people from the real value of the area, we believe that Luddenham Village should be zoned the same as other centres in the Aerotropolis "Mixed use Centre" and not Agribusiness.
9. Existing and future commercial enterprises have already been adversely impacted by the New Northern Road bypass which has diverted passing traffic around the Village, taking with it much of the passing trade previously enjoyed. The WSAP has some of the existing residential properties along the existing Northern Road being replaced by commercial properties to form a green tree-lined boulevard suitable for markets and other business, further reducing the number of residents in the Village. Exactly how does this foster emerging development within the Luddenham Village? What is going to sustain the existing business and foster the introduction of new businesses into your proposed tree-lined boulevard if the residential population is diminishing, who is going to invest in a failing economy? What is the timeframe for such a development and how are the existing businesses to survive in the meantime?
10. Time is an important component of the whole plan for the area and as the WSAP stands there are no time scales included, other than the airport opening in 2026, (only a little over 5 years from now). Again, we wish to point out that without a Development Strategy and accompanying business/project plans there is no means to identify times scales of when, still unknown, events will happen. This is a totally unsatisfactory issue as decisions are being made now on the status of people's lives and properties. We call on all changes to property zone classifications and limitations to people's rights to be cancelled until such time as a Development Strategy is

approved and established, this must include times for each component part of the Development Strategy.

11. It was anticipated that increased residential capacity of the area associated with the Aerotropolis development would compensate for losses experienced by those directly impacted, but the restrictions in 6, 7 and 9 above place such aspirations in jeopardy. The continuation of local schools will then come under threat as the diminished population fails to generate sufficient population to justify the continuation of such facilities. This plan gives no detail of how it will bring to businesses and other community services, people dependent trade from an “emerging” community designed to reduce the level of population. We call for the WSAP to be suspended until the Planning Partnership correct this situation.
12. As the population in the Village diminishes, and the number of sustainable businesses within the village reduces, the Government is creating a self-fulfilling prophecy of decline, where the village can eventually become totally Agribusiness as appears to be the intention of this Government all along as evidenced by the overarching zoning of the area as Agribusiness and the numerous restrictions, designed to drive the existing population away and preclude the emergence of any new population in the immediate area. The proposal states that it wished to preserve the heritage of the Luddenham Village. That heritage includes Luddenham as a residential area for families, some of which have been in the Village area for over 100 years. We ask that the WSAP be changed so that it will preserve the residential heritage of the Luddenham Village.
13. As already mentioned, some residents have been severely impacted by the change in the permitted use of their properties, particularly those whose properties have been identified as “greenspace usage”. The Plan lacks detail on how these residents are going to be compensated for the loss in value of their properties which can no longer be used for the purpose they were originally intended. We have previously stated that the WSAP wholly lacks a development strategy and an accompanying business/project plan. Take our advice and establish a properly formulated and timed Development Strategy before continuing with the WSAP.
14. Many residents within the broader area have received increased rate assessments on their properties. This appears to reflect the potential use of the properties in the future for agribusiness, however due to amount of uncertainty existing over the rezoning, most are not able to deal with their property at this time. Why has there been such an immediate reassessment of the value of these properties resulting in increased liabilities of the owners, when there is still so much uncertainty about the final outcomes and the owners are unable to realise any increased value and have presently lost value because of the uncertainty. We also question why the Valuer General has chosen to re-zone properties “agribusiness” within the Aerotropolis and especially the Agribusiness Precinct. The term “agribusiness” is a new descriptive term brought about by the vision of an Aerotropolis serving the new Western Sydney Airport and should not have been provided to the Valuer General while the WSAP still awaits official approval. We contend all properties recently re-zoned as “agribusiness” should be reversed and their original zoning reinstated. The valuations themselves should be reversed until such time the final outcomes for the area are known with certainty and the valuations represent the current value of the property and not some anticipated future value that in all likelihood under the current plan will never crystallise?

15. In our submission to the Listening Panel we also attached a map which showed a modified route for the Outer Sydney Orbital so that it reduced the loss of land available for development in both the Northern Gateway and the Agribusiness Precinct. Also, this issue was pointed out in some 2018 submissions to the initial Aerotropolis plan. The present Outer Sydney Orbital comes south from Erskine Park and crosses the Sydney Water Pipeline between the Twin Creek housing estate and the Celistino site for the Sydney Science park and then effectively cuts the northern Gateway in half until it makes a right angle right hand turn and tracks towards The Northern Road. After crossing The Northern Road it then makes a right angle left hand turn to the south. As part of the Outer Sydney Orbital will include the provision of a heavy freight line the two right angle turns taking the route to the west and then to the south and this requires the right angle turns to be over a wide turning circle, so losing more valuable development land. The other issue with the route is that it passes to the immediate west of the Agribusiness Precinct and this effectively closes out access to other land which could readily be included within the Agribusiness Precinct. All this land can be freed for development and better use by changing the route of the Outer Sydney Orbital. By following the Sydney Water Pipeline from Erskine park and staying on the north side of the pipeline until it reaches The Northern Road all the current land disruption will be saved. The Outer Sydney Orbital can safely pass under The Northern Road alongside the Sydney Water Pipeline and then gently turn south after which it can continue in mostly a straight line until it connects back with the original route to the southwest of Camden. Please see the attached map where the revised route is shown in red. We urge the NSW government to consider this change of route so as to not only free up more valuable land within the Aerotropolis but probably also offer a more cost effective route for the Outer Sydney Orbital.

Conclusion:-

Given the points raised above and recognising this may not be a definitive list of deficiencies we believe this plan fails to put into place such conditions that will support the successful implementation of industrial and commercial operations in the Agribusiness Precinct and as such the plan has to be widely improved. We have not looked at the details the WSAP recommends for the other Precincts in the Aerotropolis but considering the poor planning in the Agribusiness Precinct along with the public opinion we are hearing around the region we are concerned that the other Precinct plan may be equally deficient.

Special Recommendations :-

Taking into account the 15 points raised above and our conclusion we strongly recommend the following additions be made to the draft WSAP and this draft re-issued. Advise the government to establish a Development Strategy Team (DST) to study and recommend how the Agribusiness Precinct can be successfully established and in what time frame. This DST must be made up of experts with expertise in developing agricultural supply operations, we would suggest that personnel from the Dutch Food Valley, NSW Universities long with others from both the food supply and retail industries. Perhaps DST could be located within the Invest NSW operation as they would have common goals, or ideally that they operate out of an office here in the

Agribusiness Precinct, perhaps the WSA community centre offices could offer them space.

The first task of the DST will be to identify the potential products to be supplied through the Agribusiness Precinct and the base considerations must be the items available through Australia's agricultural supply chain along with a consideration of the probable markets both domestic and international. The product range specifications will need to be further divided into types of product ranges, for instance base vegetables such as potatoes and other root crops, green vegetables such as lettuces, celery & other "salad ingredients, fruit products such as apples, pears and a range of stone fruits, and we should not forget wider spice products for inclusion in the range

The next two steps are to some degree synergistic, identifying the sources of all the component vegetables and identifying the target markets for the product ranges. This part of the process cannot be underestimated for identifying the sources and cost of the supply chain will be key to not only providing product costs but will also indicate the added value of the product and to an extent the final price and potential profit. Defining prices will not be a straightforward exercise, in many cases the final price will be set according to what the market is willing to pay for it and this is likely to vary by country. Target markets is only one part of the scenario of getting products to market, the other side of the coin is identifying sales opportunities and actually selling to real buyers. The DST need to be an early part of this sales process rather than wait for an as yet unidentified sales operation to go out and seek its market share – waiting until then runs the risk of getting the supply chain wrong in the first place and being poorly placed to exploit an ever changing market.

Once the products and potential markets have been identified the next important step is to identify the businesses/organisations capable of service each part of the supply chain. The easy part will be identify who can bring the required products to the agribusiness Precinct, the conversion processes are the ones that will need to be identified, fit for purpose proven and then invited to be part of the Agribusiness Precinct operation. You should never assume that just because an opportunity is available that it will be taken up, with many critical processes to be incorporated in the supply chain it may be possible incentives need to be offered to make it practical for an organisation to establish an operation in the Agribusiness Precinct. Indeed this is another duty for the DST, establish a range of incentives that may be offer to help entice businesses to establish an operation within the Agribusiness Precinct.

Finally after identifying all the products and processes that will form the basis of the Operation of the Agribusiness Precinct the DST will need to develop a detailed project business plan to set-up and establish all the key operations, this must include operational sequencing, site sizes and location as well as timing. Allowing ad-hoc businesses to set up uncoordinated operations is unlikely to provide for a successful business model.

Some words of caution.

In the two reports produced by KPMG and NSW Farmers identifying the benefits of establishing a fresh food, (agribusiness) operation in western Sydney they identify China as the primary market within Asia. Given the assertive and coercive activities now being applied by the Chinese government to stop/restrict products supplied to China by Australia as they express their continuing displeasure with Australia's democratic

expressions we need to re-assess the value of the Chinese market to the Agribusiness Precinct, it will be a brave or foolhardy business that does not take into account the fact a market can be withdrawn at the drop of a pin. Australia's membership of the Quad may put even more business with China at risk

In the past couple of months since Joe Biden was elected President of the United States climate change has been receiving increasing attention. The US has again joined the Paris climate group. It is becoming clear that the US, Europe and the UK are taking a more concentrated interest in climate change and carbon emissions and indeed there are now suggestions that countries who do not have a zero emissions target set within a reasonable time frame may be penalised. Two suggestions are, for countries with no zero emissions target or just poor climate change mitigation actions that, a) products be charged for "carbon miles" or b) that a plain carbon duty be applied to products. The aim is the same in either case, to both force them to take more carbon emissions actions and/or make their products more expensive and so less easy to sell.

Unfortunately Australia does not have a good international record when it comes to climate change and we are one of a very few developed nations that does not have a zero emissions policy and target. Unless we take an urgent stand against climate change and convince the world we are now on board with the need to get to a zero carbon emissions target sooner rather than later we may find trade from our Agribusiness Precinct is also penalised.

We hereby request that the Department of Planning, Industry and Environment recognise the deficiencies and shortcomings of the current WSAP and consider the expectations of the local communities and undertake further consultation and consideration before releasing a revised Plan for public consideration.

Authorised for and on behalf of Luddenham Progress Association

