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Subject: Webform submission from: Western Sydney Aerotropolis Draft Precinct Plans
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Submitted by: Anonymous

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Submission Type

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I would like my submission to remain confidential

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Submission file

[celestino_2903-tnr_precinct-plan-submission_12-march-2021_final.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 52 hectare contiguous parcel of land, at the corner of the Northern Road and Park Road is located within the strategically important Agribusiness Precinct and is well positioned to deliver on Government objectives for the WSA.

The enclosed submission details our concerns with the Draft Precinct Plan and provides proposed recommendations to address our concerns. The recommendations are cognisant of the key drivers outlined within the Draft Precinct Plan, while addressing the unique nature of the Northern Road site.

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

2903 THE NORTHERN ROAD,
LUDDENHAM

12 MARCH 2021



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EXECUTIVE SUMMARY

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

Celestino fully endorses the vision of the Agribusiness Precinct being a place of opportunity for the State's agricultural and agribusiness sectors and building on the heritage of Western Sydney's successful agricultural operations. We share Government's vision that the Precinct's heart, Luddenham Village will be a destination for local, regional, national and international visitors to celebrate the merging of the rich history of Western Sydney with its future on the global stage.

Our submission supports, as well as builds on, this vision by recommending amendments to the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (**SEPP**) and the draft Precinct Plan to enable orderly, viable and early activation within this Precinct. The key recommendations include:

- Updating the SEPP Land Zoning Map
- Updating the SEPP – Schedule 1 Additional Permissible Uses
- Clarifying the minimum and maximum lot sizes within the draft Precinct Plan
- Include provisions in the Precinct Plan that require the relevant planning authority to assess and approve variations to the Precinct Plan based on its merit
- Amend SEPP Clause 43(3)(b)(ii) such that any masterplan does not have to be consistent with the DCP
- Remove the Undisturbed Soil Network provisions
- Amend the SEPP Land Reservation Acquisition Map to include all land proposed to be reserved for public purposes

As the owner of an approximate 52ha contiguous parcel of land, and an experienced developer specialising in Western Sydney, we believe we are able to facilitate early activation within the Agribusiness Precinct starting with the Precinct's heart, Luddenham Village. To enable us to do this, and fulfil the vision set within the draft Precinct Plans, we recommend that Government introduce a small area of mixed-use zoning as an extension of Luddenham Village to:

- Support the viability of existing small businesses and jobs
- Accelerate the creation of a world class Agribusiness Precinct
- Create a buffer between existing land uses and Agricultural land uses, avoiding conflicts in each respective land use zone and providing certainty for the existing land users and future development.
- Providing a logical mixed-use extension of Luddenham Village to allow this amenity to expand in the future to service local, regional, national and international visitors and ensuring the Agribusiness Precinct within the Western Parkland City will be resilient and adaptable into the future
- Compliment the heritage of Luddenham Village and surrounding amenity including the Luddenham Showgrounds with uses to create active frontages, promote a walkable city and provide amenity to the local community, workers, business and residents
- Avoid triggering future planning proposals, which otherwise creates an unnecessary process for both landowners and Government
- support the growth of the Aerotropolis, revitalise the heritage Luddenham Village, in a compatible nature similar to that of the towns of the Blue Mountains which will be unique compared to the scale and form of the wider Aerotropolis

Celestino welcomes the opportunity to work collaboratively with the Western Sydney Planning Partnership in a beyond business as usual approach to develop the land adjacent to the Agribusiness Precinct's heart, Luddenham Village, into a world class Agribusiness Precinct.

INTRODUCTION

Celestino is an Australian owned family business focused on delivering high quality mixed-use urban developments across Australia. Celestino is part of the Baiada Group, renowned for iconic brands Steggles and Lilydale, founded in Western Sydney by Celestino Baiada in 1916. The Baiada Group is one of Australia's largest private companies employing over 7,000 people. With Baiada's extensive history in Australian agriculture and Celestino's proven capability to deliver thriving communities, there is no one better placed to contribute to the early activation of the Agribusiness Precinct starting at the Precincts heart, Luddenham Village.

The subject site, 2903 The Northern Road, Luddenham presents a unique opportunity for both Celestino and the NSW Government to catalyse and expand economic growth and job creation opportunities that currently exist around Luddenham Village.

The placemaking attributes of the site include:

- Strategically located 400m North of Luddenham Village
- Approximately 52 ha contiguous parcel of land
- High transport accessibility and connectivity, including the Northern Road alignment, Elizabeth Road intersection and the planned M9 and M12 Motorways and the Park Road upgrade
- Located outside of the ANEC/ANEF 20 contour and as such is suitable for the development of noise-sensitive land uses such as mixed-use
- Historically cleared, flood free and does not contain significant watercourses.
- Encompassed by the Outer Sydney Orbital Corridor (under investigation) creating a logical separation between the urban and rural areas



Figure 1: The site in context to the draft Agribusiness Precinct Plan

CELESTINO'S VISION FOR THE SITE

Celestino's vision for this site is to maximise the economic development outcomes that can be created through leveraging the sites' geographical location to both the Western Sydney Airport and Luddenham Village. The sites' attributes, transport accessibility and connectivity provide both Celestino and the NSW Government with the opportunity to establish an economic gateway hub within the proposed Agribusiness Precinct.

Celestino's vision supports proposed outcomes for the NSW Governments draft Western Sydney Aerotropolis Precinct Plan that states the intention for Luddenham Village to *become a destination for local, regional, national and visitors... and as the tourism and cultural hub for the Aerotropolis...becoming a destination for food and arts.* To deliver this vision The Old Northern Road is to be *transformed into a green boulevard through Luddenham Village. The character of the Road will evolve into a 'main street' lined with retail, hospitality, and commercial offerings. Historic elements within Luddenham Village will be revitalised to meet the needs of the existing and emerging community and visitors. Its sensitive renewal will ensure it can support both the existing and emerging community.*

Celestino's vision for this site includes:

- Creating a flourishing mixed-use place that is interconnected to the fabric of Luddenham Village, the planned Western Sydney Airport and the broader Western Sydney Aerotropolis
- Complimenting existing small business, attracting investment and creation of new jobs
- Aligning and supporting the draft Precinct Plans eight key drivers:
 - Connecting to country
 - Landscape led
 - Great places
 - Transport investment and jobs
 - Circular economy
 - A resilient city
 - Urban comfort and Green Streets
 - Market factors
- Creating smart city and circular economy opportunities for agribusiness tourism such, as local markets, fresh produce display, food production experiences, restaurants, cafes, and other uses showcasing local, regional, and Australian produce.
- Compliment the heritage of Luddenham Village
- Provide surrounding amenity including the Luddenham Showgrounds and create active frontages, promote a walkable city and provide superior placemaking for the local community

To achieve Celestino's vision for the site, and those of the NSW Government for the Agribusiness Precinct more broadly, it is strongly recommended that the NSW Government considers including MixedUse as part of the planning controls proposed for strategic locations within the Agribusiness Precinct.

Recognising the need for mixed-use as part of the Precinct Plans for the Agribusiness Precinct will avoid triggering future planning proposals which creates an unnecessary process for both private sector developers and State and Local Governments. The draft Precinct Plans should account for, and future proof, the economic development growth that will be activated within the Agribusiness Precinct to avoid in-fill development in decades to come, like what is occurring at the Castle Hill showgrounds.

Without mixed-use zoning allowed within strategic locations within the Agribusiness Precinct, it will place enduring economic expansion constraints on the long-term viability of Luddenham Village, and the surrounding areas. It will position the area to be unable to realise the multi-decade economic opportunities that will be created by the Western Sydney Airport.

Please note, Celestino is proposing only allocating 10ha of the entire 52ha for mixed-use zoning with the remaining land being allocated to the agribusiness zoning.

RECOMMENDATION FOR STRATEGICALLY ALLOCATED MIXED-USE ZONING WITHIN THE AGRIBUSINESS PRECINCT

It is Celestino's view that without mixed-use activation of the old Northern Road frontage, the realisation of a flourishing economic hub that includes Luddenham Village and the wider Agribusiness Precinct will be diminished considerably. Due to the strategic location and the site attributes, Celestino recommends that the draft Precinct Plans considers allowing mixed-use zoning on a proportion of the 52ha site. Figures 2, 3 and 4 below summarise the site vision and proposed zoning changes.

This proportion of land recommended for mix-use zoning is approximately 10ha that could provide a range of commercial opportunities such as commercial offices (including shared office space) business and tourism

accommodation, business facilities, amenity to the local community, hospitality, additional allied services to support the broader Agribusiness Precinct and the Western Sydney Aerotropolis.

This allocation of a mixed-use zone within the site will also be fundamental in supporting the evolution of the Luddenham Village to expand into a modern, complimentary mixed-use area that support existing business growth, attracts new investment and businesses, create superior placemaking and support the provision of goods and services to meet the growing population within the Western Sydney Aerotropolis.

Above the economic and job creating benefits of allowing 10ha mixed-use zoning within the 52ha site include:

- Creating a buffer between existing land uses and Agricultural land uses, avoiding conflicts in each respective land use zone and providing certainty for the existing land users and future development
- Providing a logical mixed-use extension of Luddenham Village to allow this amenity to expand in the future to service local, regional, national and international visitors and ensuring the Agribusiness precinct within the Western Parkland City will be resilient and adaptable into the future
- The subject site is located outside the ANEC 20 Contour and is suitable for the development of sensitive land uses (such as mixed-use).

The proposal to include mixed-use zoning to 10ha within the site also supports and aligns with the Aerotropolis' vision for the Agribusiness Precinct in that it:

- Protects and enhances Luddenham Village
- Increases supporting employment uses for agribusiness
- Ensures viability of the Luddenham Village by providing a small population
- Increases local amenity to promote walkability rather than driving to nearest mixed-use centres
- Promotes early activation due to the availability of existing service and infrastructure

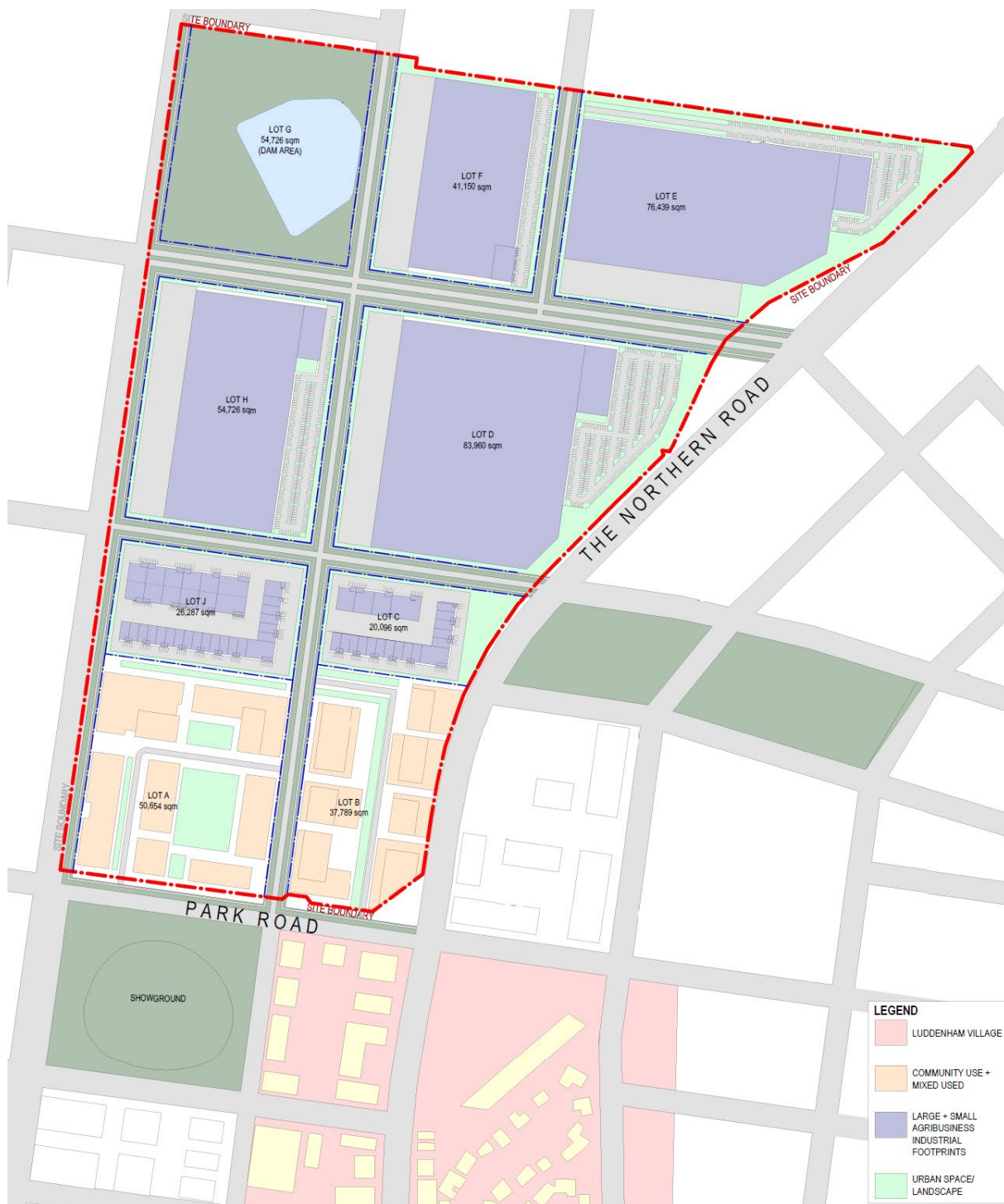


Figure 2: Indicative Site Concept Plan

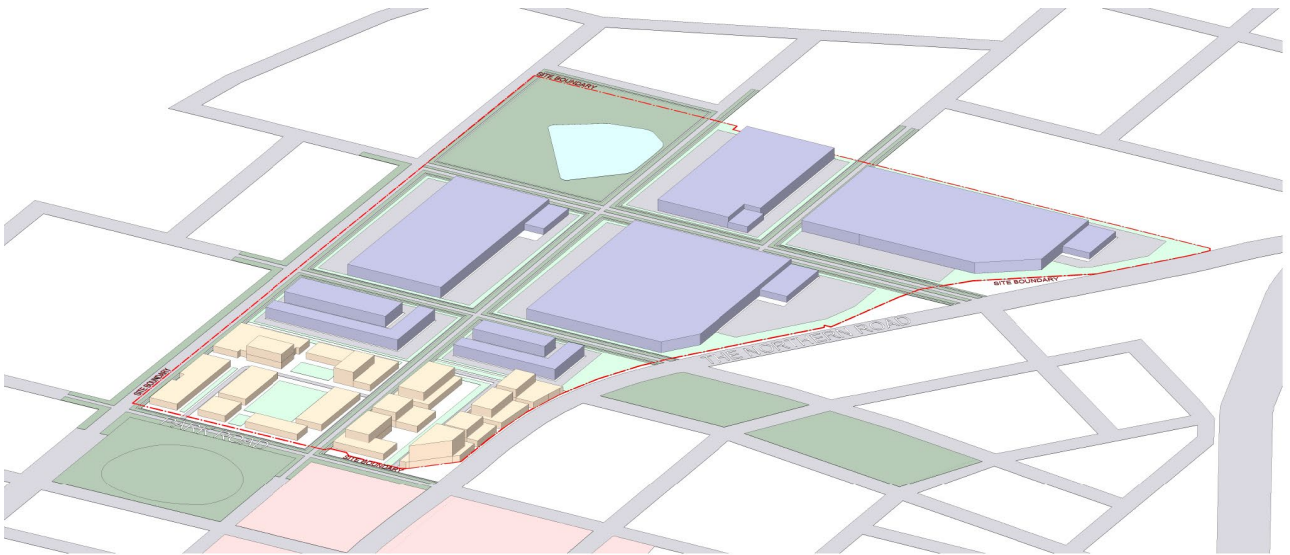


Figure 3: Site Indicative Massing

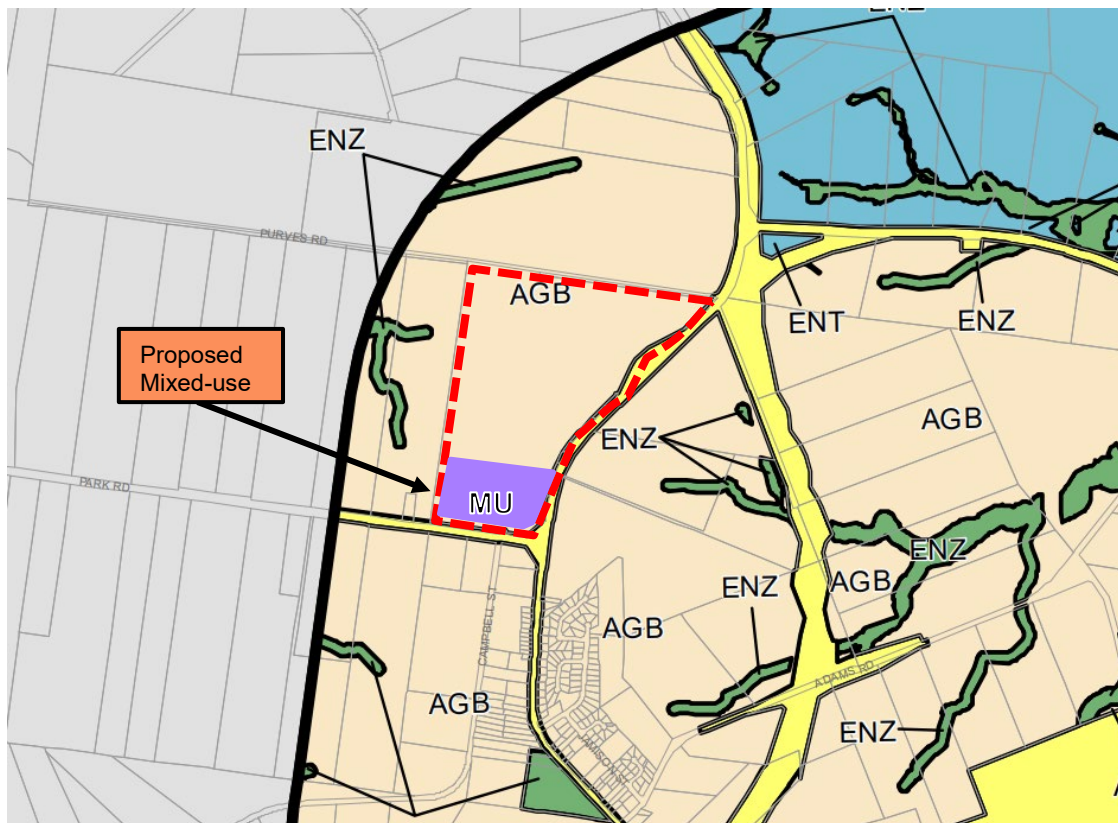


Figure 4: Proposed Zoning Changes

The following table demonstrates how our vision for strategically located mixed-use zoning within the site supports and aligns with the NSW Government's key Urban Design and Landscape Report principles:

Principles	Comments
Connecting to Country	<p>The road and lot layout proposed in the draft Precinct Plan across the site remains unchanged.</p> <p>Elements such as view lines to the Blue Mountains can be achieved with appropriate public and private open space and building articulation and setbacks.</p>
Preserve and Protect Water Assets	Retention of the existing farm Dam in the north west corner of the site remains unchanged on the basis that it can be used as OSD and reshaped as required.
Preserve and Protect Landscape Ecology	<p>The proposal does not suggest wholesale changes to the draft Precinct Plan. Road typologies are unchanged ensuring open space targets and road typologies proposed in the precinct plans are met.</p> <p>A mapped patch of "Existing remnant vegetation - framing long views" in the south east corner of the site has been removed in preliminary site modelling. While the intent to maintain trees within the precinct plan is supported, it is preferred that tree retention is determined after ecological assessments are undertaken.</p> <p>It is noted that most of the site is clear of vegetation and currently comprises exotic grassland and developed areas containing intensive livestock (poultry rearing) sheds with adjacent planted open paddocks and access tracks.</p>
Undisturbed Soil Network	The USN is not supported within submission, please refer to <i>Key Issues and Clarifications</i> for detailed comments.
Key Streets	<p>The road and lot layout proposed in the draft Precinct Plan across the site remains unchanged. The Continuous grid with other precincts is maintained.</p> <p>The site is very well serviced by existing and proposed transport Infrastructure including: Park Road, the Old Northern Road (including a specific site access point), the relocated Elizabeth Drive, and the M12.</p> <p>A sub-arterial road running through the site provides a truck diversion around Luddenham Village/ Old northern Road, allowing Old Northern Road to be reclassified as a local collector road.</p> <p>We have proposed no change to the structure plan that includes a sub-arterial road running through this site to provide a truck diversion around Luddenham Village/ Old northern Road, allowing Old Northern Road to be reclassified as a local collector road.</p>
Precinct Structuring	The site is encompassed by the Outer Sydney Orbital Corridor (under investigation) creating a logical separation between the urban and rural areas; and
Local Centres	<p>The proposal seeks to enhance the Luddenham Village Local Centre.</p> <p>The site is a prominent, gateway location, directly visible once entering/leaving Luddenham Village via the Old Northern Road from the north. Enhancement of the site will further compliment Luddenham Village as a Key Centre.</p> <p>Within the draft Precinct Plans, active frontage uses are proposed on the southern side of Park Road (immediately south of the site) including residential accommodation, childcare, open space and recreation (show grounds) and commercial development. Our proposal seeks to duplicate these active frontages on the north side of Park Road creating a uniformed, welcoming and active local centre.</p>
Integration and connectivity with Aerotropolis and context	The proximity of the site to the Airport Entrance, Luddenham Village and the Agribusiness Precinct will create opportunities for agribusiness tourism such, as local markets, fresh produce display, food production experiences, restaurants, cafes, and other uses showcasing local, regional and Australian produce.

In anticipation of the Agribusiness Precinct Plan being finalised, we recommend the revised Precinct Plan incorporates both Agribusiness and a small amount of mixed-use land zoning. In conjunction, we recommend additional permissible uses are included as Schedule 1 within the SEPP to allow suitable land uses (e.g.

agribusiness, industrial, commercial, office, retail, warehousing) prescribed for the Agribusiness Zone. We also seek that residential accommodation, hotel and motels be included in the mixed-use to cater for Agritourism as prescribed for the Agribusiness Zone.

KEY ISSUES AND CLARIFICATIONS

In order to achieve the vision of the Agribusiness Precinct, we provide this table outlining our concerns and recommendations to the draft Precinct Plans.

Reference	Recommendation	Justification
Table 6 Maximum Block Sizes	It is recommended that the 20ha Food production area is removed from the Agribusiness Precinct in order to provide the necessary flexibility to achieve the employment targets.	Block Sizes: the specified maximum block size for the Agribusiness Precinct is - 350 m x 350 m which gives a maximum lot area of 12.25ha. This conflicts with the minimum 20ha food production area and highlights the arbitrary nature of this minimum lot size and its potential to inhibit the desired vision for the Agribusiness Precinct as shown on the Draft Land Use Plan.
Introduction	Update the Precinct Plan to encourage a wider range of uses	<p>Many of the land uses permissible under the SEPP are not mentioned / supported by the intent statement within the Precinct Plan (particularly in the 20 ha, intensive food production area). These uses include tourism, further food processing, industries, logistics, commercial, tourism etc.</p> <p>It is recommended that the intent statements and objectives throughout the precinct plan be broadened to allow for a more diverse range of uses within the agribusiness zone can be achieved, as envisaged by the SEPP.</p>
	Remove the undisturbed soil network (USN)	<p>Existing Soil Conditions- viability of plant growth due to the poor quality of existing soils because of historic agricultural uses. Desired ecological outcomes for the project will not be achieved.</p> <p>Road Design- basic engineering road design principles and road safety requirements conflict with USN requirements. Specifically, Austroads Guide to Road Design road user safety outcomes.</p> <p>Riparian/Road Interface- likely loss of additional developable land due to the transition requirements between riparian corridors and interfacing roads prescribed by the USN.</p> <p>Riparian Corridors- viability of design and construction of trunk drainage and impact on 1:100-year flood levels and extent resulting in the loss of developable land.</p> <p>Importation of Fill Material- likely increased reliance on imported material for filling rather than a cut/fill balanced approach.</p> <p>Amenity- reduce the ability deliver quality open space amenity with accessibility and walkability as key principles to align with the vision for an all-inclusive and walkable city.</p>
	Clarification is sought on TfNSW road acquisition and delivery	Further clarity is sought on how the TfNSW sub-arterial road that runs through the site will be acquired and delivered. This road is a key freight connection to the wider Agribusiness Precinct and a key truck diversion that allows Old Luddenham Road (south of Park Road) to be transformed into a lower order, pedestrian friendly green boulevard, greatly contributing to the activation Luddenham Village.

		<p>The proposed 40m road reserve represents a significant land take of approximately 3.5ha, which is approximately double the land take of traditional industrial road reserve.</p> <p>There are further concerns around the proposed intersections throughout the site and connections onto Park Road and the Old Northern Road. These intersections have not been marked as signalised nor has any detailed been provided regarding land take for roundabouts, slip lanes or other intersection treatments.</p>
	Clarification is sought on operation of existing Agricultural Uses	<p>2903 The Northern Road is an operating poultry farm. Celestino note concerns with conflicts in the planning controls that not only discourage new development via stringent and uncommercial development controls, but also prohibit the operation of the existing poultry farm on the site, due to factors such as odour and spray drift in a precinct designated for Agribusiness.</p>

A comprehensive list of comments is provided within Attachment 1.

CONCLUSION

To achieve this vision for the Agribusiness Precinct, this submission provides the following key recommendations in relation to the draft Precinct Plan and SEPP:

- **Broaden the statements and objectives for the Agribusiness Precinct** to support a more diverse range of land uses within the Agribusiness Zone. These uses include tourism, further food processing, industries, logistics, commercial, tourism etc.
- **Remove the 20 Ha Intensive Food Production Area** as it conflicts with the Draft Precinct Plans (including land use plan, road network plans etc) and places significant, arbitrary restrictions on development which will limit development and employment opportunities and inhibit achievement of the objectives to the Agribusiness Precinct.
- **Broaden the intent statements and objectives** for the Agribusiness Precinct to support a more diverse range of land uses within the Agribusiness Zone (as envisaged by the SEPP). These uses include tourism, further food processing, industries, logistics, commercial, tourism etc.
- **Remove the Existing remnant vegetation** - framing long views in the south east corner of the site from the Scenic and Cultural Connection map and allow the small number of trees in this location to be addressed as part of individual development applications.
- **The proposed undisturbed soil network USN should be removed** and clarifications added that allows for dams be allowed to be integrated into both site specific and broader aerotropolis integrated water management systems.
- **Provide more flexibility** within the Precinct Plan document and assessment process.

Our key recommendations in relation to the SEPP are to:

- Amend the SEPP Land Zoning Map to include a small are of mixed-use zoning as per Attachment 2 and Figure 4
- Amend the SEPP, Schedule 1 Additional Permitted Uses, permitting the development of '*Residential Accommodation*', and '*Hotel or Motel Accommodation*' within mixed-use zoning, outside of the ANEC/ANEF 20 contour

We thank the WSPP for the opportunity to provide this submission and confirm our availability and willingness to work in partnership to ensure the unique opportunities associated with this important site are incorporated into the Precinct Plans.

ATTACHMENT 1 – DETAILED COMMENTS

A detailed review of the Draft Aerotropolis Precinct Plan has been undertaken which has identified the following matters which need to be addressed by the Western Sydney Planning Partnership as part of the finalisation of the Agribusiness Precinct Plan.

PAGE	CHAPTER	ISSUE	RECOMMENDED ACTION
GENERAL COMMENTS			
		DCP Phase 2: There are many detailed design issues which are potentially going to be addressed within the Phase 2 DCP such as landscaping, setbacks, car parking, design. It is difficult to understand the full implications of the Draft Precinct Plan without access to the Phase 2 DCP.	It is requested that the Phase 2 DCP be released as soon as possible to enable landowners to fully understand the implications on potential development opportunities.
	All	Level of Detail in Precinct Plans: The very high level of detail with the Precinct Plans (such as road layouts, blocks, community infrastructure, park locations etc) limits any flexibility within the planning process unless a planning proposal is required for any departure (no matter how minor) from the Precinct Plan (as detailed within Section 1.4). This limits flexibility and innovation that a developer can bring to the project as even minor variations to the Precinct Plans will trigger a concurrent DA or precinct proposal. This will add significant delays to the development process and activation of economic activity within the site	More flexibility is required in the Precinct Plan document and assessment process. It is recommended that an entire layer of detail needs to be removed from the Precinct Plans to reduce them to a more conceptual level. Significant detail could be moved to the DCP Phase to allow more flexibility in future development applications that will not warrant a planning proposal.
12	1.4 Introduction	Modifications to the Precinct Plan by proposed development applications. Even is a a proposed development has minor inconsistency with the Precinct Plan, an amendment to the Precinct Plan may be required. This is to be achieved via a planning proposal, being submitted to the Secretary of the Department of Planning, Industry and Environment to change the Agribusiness Precinct Plan. This limits flexibility and innovation and requires an applicant wishing to depart from any aspect of the Precinct Plan to prepare a concurrent DA or planning proposal to address minor inconsistencies. This will add significant delays to the development process and activation of economic activity on the site In addition, if multiple parties are proposing development that is in apparent conflict with the Precinct Plans, multiple planning proposals are going to be running in parallel.	As above, more flexibility is required to avoid triggering Planning Proposals for minor inconsistencies with the Precinct Plan.
SUPPORTED LAND USES			
6	Executive Summary	The Executive Summary indicates that the Agribusiness Precinct is a place of opportunity for the State's agricultural and agribusiness sectors, employing	To achieve this vision, more flexibility and a wider range of land uses should be permissible within the Agribusiness Zone (i.e. mixed-use on strategic land)

PAGE	CHAPTER	ISSUE	RECOMMENDED ACTION
		around 10,000 workers. It will build on the heritage of Western Sydney's successful agricultural operations. At the Precinct's heart, Luddenham Village will be a destination for local, regional, national, and international visitors to celebrate the merging of the rich history of Western Sydney with its future on the global stage.	In particular, the constraints placed on the subject site (e.g., minimum lot size of 20 ha, limitations to food production etc) would limit opportunity, restrict development and could compromise the commercial viability of development projects within the Agribusiness Precinct. It is recommended that the 20 ha Precinct be removed.
18	Introduction	Agribusiness Zone: Supports high-tech agribusiness uses, including freight, logistics and horticulture.	Many of the land uses permissible under the SEPP are not mentioned / supported by the intent statement within the Precinct Plan (particularly in the 20 ha, intensive food production area). These uses include tourism, further food processing, industries, logistics, commercial, tourism etc. It is recommended that the intent statements and objectives throughout the precinct plan be broadened to allow for a more diverse range of uses within the agribusiness zone can be achieved, as envisaged by the SEPP.
51	2.4.2 Agribusiness Precinct Vision	Vision Statement: Envisages the development of agribusiness hubs including an Integrated Logistics Hub, Agriport, Integrated Intensive Production Hub, Australia Centre of Excellence in Food Innovation, Fresh Product and Value-Added Food – Pharma Hub.	As above, the land uses referenced in the vision statement need to be broadened and expanded to allow for a more diverse range of activities within the Agribusiness Precinct. In particular, the 20ha precinct north of Luddenham Village will not be able to deliver on this vision as it has been quarantined for food production only.
36	2.2 Place-based opportunities and constraints	Sensitive Land Uses: locate sensitive land uses outside of areas affected by aircraft noise and plan for low employment density businesses in public safety areas.	The subject site is located outside the ANEC 20 Contour and is suitable for the development of sensitive land uses. Due to its location immediately north of Luddenham Village and the provision of existing and proposed infrastructure, the site can support the development of residential uses to support the activation of h agribusiness uses on the site. This would also create a complementary transition between the Luddenham Village and the agribusiness zone which will limit the potential for land use conflicts. It is recommended that the southern portion of the site be identified within the Mixed-Use Zone and that the Precinct Plan be amended to allow development of a diverse range of land uses as a transition between Luddenham Village and the surrounding Agribusiness Precinct.
52	2. Precinct Plan Framework - Agribusiness Precinct Objectives	Tourism: Objective O7 Embrace tourism opportunities presented by the development of the Airport.	The proximity of the site to the Airport Entrance, Luddenham Village and the Agribusiness Precinct will create opportunities for agribusiness tourism such, as local markets, fresh produce display, food production experiences, restaurants, cafes, and other uses

PAGE	CHAPTER	ISSUE	RECOMMENDED ACTION
			<p>showcasing local, regional, and Australian produce.</p> <p>A number of the land uses required to achieve this objective are not mentioned / supported by the intent statement within the Precinct Plan (particularly in the northern 20 ha food production area). These uses include tourism, further food processing, industries, logistics, commercial, tourism etc.</p> <p>In addition, hotels, motels, serviced apartments which are necessary to attract & support tourists should be permissible as mixed-use development within the Agribusiness Precinct.</p> <p>It is recommended that the intent statements and objectives throughout the precinct plan be broadened to allow for a more diverse range of uses within the agribusiness zone can be achieved, as envisaged by the SEPP.</p>
POTENTIAL CONSTRAINTS			
74	3.2.4 BG2	Waterways: The Precinct Plan requires Strahler Order 2 (or higher streams) to be maintained and rehabilitated. It is not clear if these streams are already mapped within the Environment and Recreation Zone or if additional waterways within the Agribusiness Zone need to be retained. This creates uncertainty for development and likely conflicts with the suite of plans (road network, land use, etc) included in the Draft Precinct Plan.	It is recommended that the requirements for maintaining Strahler Order 2 (or higher) are aligned with NRAR guidelines.
93	3.3.1 / 3.3.8 Figure 22	Transport Network: The Draft Precinct Plan requires development to be consistent with the road network. However, this is in conflict with several other requirements including constraints, minimum block sizes etc. As such, any development of the site will potentially trigger a Planning Proposal (under section 1.4 of the Draft Precinct Plan to resolve conflicts within the document.	<p>More flexibility is required in the Precinct Plan document and assessment process. It is recommended that an entire layer of detail needs to be removed and the Precinct Plans to reduce them to a more conceptual level.</p> <p>Significant detail could be moved to the Phase DCP to allow more flexibility in future development applications.</p>
78	3.2.6 Undisturbed Soil Network	<p>The farm dam in the north west corner of the site is mapped within the undisturbed soil network (USN). These areas are to be subject to minimal earthworks and to be retained in its' "natural state."</p> <p>This is contradictory to Section 3.2.4 of the Draft Precinct Plan which identifies that farm dams are to be repurposed for flooding, stormwater management purposes which will require some degree of modification to enable this to occur.</p>	It is recommended that the Undisturbed Soil Network is removed from the proposed plans and clarifications added that allows for dams be allowed to be integrated into both site specific and broader aerotropolis integrated water management systems.
89	3.2.9 Scenic and Cultural Connections Figure	Remnant Vegetation: Figure 18: shows the site having 'Existing Remnant Vegetation - framing long views' and 'Open Space on Ridgetops or Local High	It is recommended that this corridor be removed from the Scenic and Cultural Connections Map, and retention of mature trees be addressed as part of individual development applications.

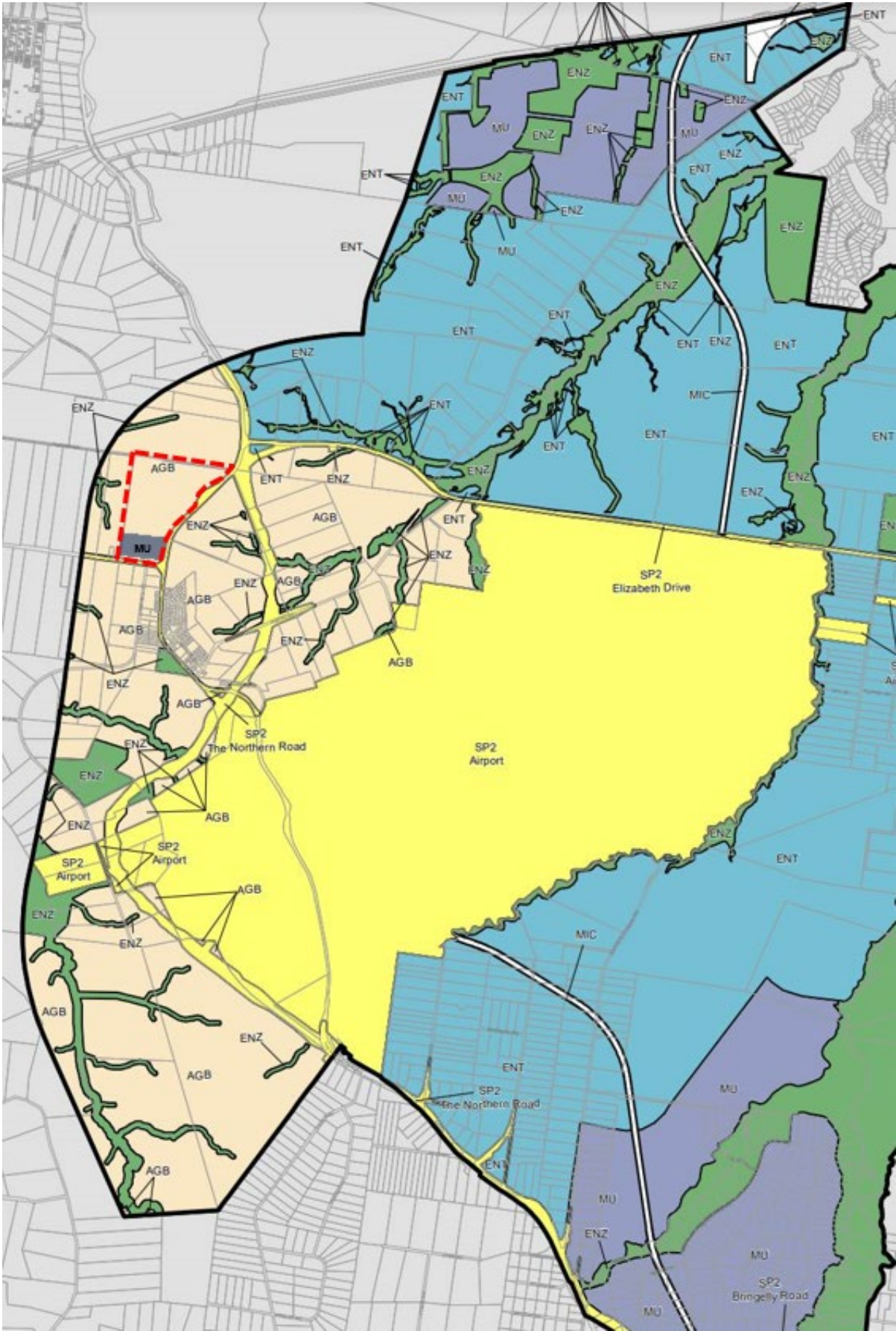
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		<p>Points' which are intended to be maintained.</p> <p>This area contains ~20 trees spread over a 500m distance that are sparsely located (mostly 20 – 50m apart) and are not riparian vegetation.</p> <p>While the intent to maintain trees is within the precinct plan is supported, soil mapping of this sparse vegetation within an arbitrary corridor running diagonally across the site will compromise the proposed road network and create an inefficient urban design, with minimal public benefit.</p> <p>In addition, similar to the above constraints, this corridor is in conflict with the suite of plans (road network, land use plan, etc) included in the Draft Precinct Plan which do not maintain this area.</p> <p>As such, any development of the site will potentially trigger a Planning Proposal (under section 1.4 of the Draft Precinct Plan to resolve conflicts within the document.</p>	
LUDDENHAM VILLAGE			
51	2.4.2 Agribusiness Precinct Vision	<p>Luddenham Village Expansion:</p> <p>Luddenham Village is intended to become a destination for local, regional, national, and international visitors to celebrate the merging of the rich history of Western Sydney with its future state on the global stage due to the construction of the Airport. It will emerge as the tourism and cultural hub for the Aerotropolis celebrating and being anchored by, the rich cultural heritage and elevated vistas of Western Sydney. It is to become a destination for food and arts, providing opportunities for social and cultural engagement. Planning for the village will recognise key sites that anchor movement corridors in a highly pedestrianised environment. The village will remain compact but will be a distinctive centre where heritage sites are protected and enhanced. Cultural wayfinding will guide visitors as they navigate through the village.</p> <p>In order to achieve this vision, additional service and facilities and complementary land uses will be required.</p> <p>The Luddenham Village 'Key Site' currently extends north to Park Road and adjoins the subject site. It is considered that the subject site provides a logical, future mixed-use extension of Luddenham Village and can play an important role in economic growth and local investment.</p> <p>Limiting the extent of growth and development to the "Key Site" area, largely accommodates the existing</p>	<p>It is recommended that southern part of the site be included in the Mixed-Use Zone and the Luddenham Village Key Site.</p> <p>The addition of Mixed-Use land will allow Luddenham Village, and the identified 'Gateway Sites' on Park Road and The Northern Road (immediately north of Luddenham Village) to realise their full potential and benefit from on opportunities and flow on benefits from its proximity to the future Airport.</p>

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		development footprint, and as such, this will place limitations on the possibilities for the “future vision, role and function” of Luddenham Village, and runs the risk of stagnating economic growth.	
123	3. Precinct Plan Table 2. Hierarchy of Centres	<p>Local Centres: Luddenham Village* (a unique local centre - see below) Typical Uses (p.123) Retail facilities, specialty shops and a supermarket or large grocery store; personal services; co-location with social infrastructure (community facilities and open space); smaller scale mix of uses supporting industrial, office and employment uses with a diversity of commercial spaces, community and public places.</p> <p>Typical Uses (p.124) Support services as well as places for cultural activities, tourist facilities and uses, research facilities, retail, commercial, agribusiness uses, visitor accommodation and existing residential.</p>	<p>The southern end of the subject site is mapped within the Local Centre Area but is included in the Agribusiness Precinct and more specifically contained in the 20 ha sites and food production. In order to achieve the vision for Luddenham Village it is recommended that the site be:</p> <ul style="list-style-type: none"> - Included in the Mixed-Use Zone of the SEPP; - Included within the Luddenham Village Key Site and addressed as part of the future master planning process; - Removed from the 20ha area requirement and permit a diverse mixed-use range of land uses to be developed.
128	Requirements - Agribusiness	<p>Luddenham Village Gateway: LU16 - Luddenham Village local centre should be a gateway area to the Aerotropolis especially when entering from the direction of the OSO.</p>	<p>In order to achieve the vision for the Luddenham Village Gateway, it is recommended that the site be:</p> <ul style="list-style-type: none"> - Included in the Mixed-Use Zone of the SEPP; - Included within the Luddenham Village Key Site and addressed as part of the future master planning process; - Removed from the 20ha area requirement and permit a diverse mixed-use range of land uses to be developed.
INTENSIVE FOOD PRODUCTION (20ha) AREA			
192 - 193	4.3.2 Specific Precinct Plan - Performance Criteria	<p>Food Production / 20ha Area: AO1 - Ensure lot sizes in the northern area of Agribusiness Precinct are large to support sustainable land for food production.</p> <p>A1 - Land within the northern area of Agribusiness Precinct should be a minimum of 20ha as shown on the Minimum Lot size map (Figure 59) in order to support food production.</p> <p>The Draft Precinct Plan seeks to provide an area of sustainable food production by providing an arbitrary 20 Ha minimum lot size to Agribusiness Zoned Land immediately north of the Luddenham Village. In this case, there is no clear relationship between a minimum lot size and provision of sustainable food production.</p> <p>The Draft Precinct Plan Summary report indicates that the “<i>Integrated Intensive Production Hub Support the production and value-adding of sustainable, high-quality fresh produce and pre-prepared consumer foods, bringing opportunities</i></p>	<p>It is recommended that the 20ha Food production area is removed from the Agribusiness Precinct in order to provide the necessary flexibility to achieve the vision for the agribusiness precinct.</p>

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		<p><i>to existing and new businesses, markets and products. Enabling revolutionary urban agricultural solutions, it will accommodate large scale high-tech glasshouse operations and smaller scale vertical farming operations.”</i></p> <p>The Draft Precinct Plan Road Layout and associated land uses plan applicable to the site shown the site being broken up into lot sizes down into 14 Lots ranging from 10Ha to less than 2 HAs. Which provide much more flexibility to accommodate a range of revolutionary urban agricultural opportunities than a blanket 20Ha minimum lot size.</p> <p>If the 20 HA lots were applied to the subject site, a maximum of 2 lots would be possible, significantly inhibiting the range and types of businesses which would be interested in establishing in this location.</p> <p>Further, 20 ha is considered to be too large for a range of food production for a range of niche and innovative food production activities, and too small for larger operations which require much more land and greater setbacks to adjoining uses.</p> <p>As such, it is requested that the arbitrary limitation to 20 ha be removed.</p>	
134	Table 4 employment Density	<p>Employment Targets: Jobs per hectare in 3.4.5 Table 4 are 10 – 30 per hectare.</p> <p>To meet the job targets, each 20ha lot would need to generate 200 – 600 jobs to comply with this requirement. Larger lots with intensive food production (e.g., green houses) typically have low employment numbers.</p>	It is recommended that the 20ha Food production area is removed from the Agribusiness Precinct in order to provide the necessary flexibility to achieve the employment targets.
DESIGN PROVISIONS			
140	Table 6 Maximum Block Sizes	<p>Block Sizes: the specified maximum block size for the Agribusiness Precinct is - 350 m x 350 m which gives a maximum lot area of 12.25ha. This conflicts with the minimum 20ha food production area and highlights the arbitrary nature of this minimum lot size and its potential to inhibit the desired vision for the Agribusiness Precinct as shown on the Draft Land Use Plan.</p>	It is recommended that the 20ha Food production area is removed from the Agribusiness Precinct in order to provide the necessary flexibility to achieve the employment targets.
168	Figure - Social, Community and Cultural Infrastructure	<p>Nearby Sensitive Use: The Draft Precinct Plan shows a childcare centre (suggested location) immediately south of subject site. This creates potential conflicts between the centre and the proposed intensive food production activities envisaged on the site.</p> <p>The location of Sensitive Land uses next to the intensive food production 20ha area highlights that this interface areas needs to be reconsidered and carefully planned.</p>	<p>In order to better manage this interface, it is recommended that the site be:</p> <ul style="list-style-type: none"> - Included in the Mixed-Use Zone of the SEPP; - Included within the Luddenham Village Key Site and addressed as part of the future master planning process; - Removed from the 20ha area requirement and permit a diverse

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			mixed-use range of land uses to be developed.
172	SR7 - Greenstar Requirements	<p>ESD: Design Requirements for Green Star Communities – 6+ stars, Green Star – 6+ stars, NatHERS – 8+ star/ Passive home.</p> <p>While the intent to increase the sustainability of buildings is supported, the reference to a particular standard create issue for purpose-built agribusinesses. In these cases, the design of the buildings is driven by food safety and operational considerations and as such the application of a prescriptive requirement can be difficult to achieve.</p>	It is recommended that more clarity and flexibility be provided with respect to the application of Greenstar requirements to specialist buildings.
130-131	Table 3 Maximum Heights of Buildings & Figure 31 Height Plan	<p>Building Height: A 10-20m maximum building height is applied to the Agribusiness Precinct. The range 10-20m creates uncertainty for development and should be tied to a specified level such as the OLS.</p>	It is recommended that the height of Buildings should be capped to the OLS relative to ground level. At the site this would be 30.8 m in part, depending on topographic features.
STAGING			
8	Executive Summary	<p>First Priority Areas: Agribusiness land in the northern area enabling access to the Western Sydney Airport from The Northern Road.</p> <p>However, the infrastructure staging plans identify this this area as a last priority.</p>	The subject site has frontage to Northern Road and is ready for development and is accordingly described as a first priority area. However, this conflicts with the Development Sequencing Plan which shows it as a last priority for infrastructure sequencing. It is recommended that the Infrastructure Staging Plans be updated to reflect the site as a first priority area.
210 - 212	5. Infrastructure Delivery and Staging	<p>Staging: Agribusiness Precinct is shown on the Sequencing Plan, as being the last Precinct to be developed. The third areas of priority are: Land that is further from either committed infrastructure and / or more difficult to develop owing to environmental and topographical constraints.</p>	As above, it is recommended that the Infrastructure Staging Plans be updated to reflect the site as a first priority area.

ATTACHMENT 2 – PROPOSED ZONING AMENDMENTS



ATTACHMENT 3 – INDICATIVE SITE CONCEPT PLAN

