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From: noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <noreply@feedback.planningportal.nsw.gov.au>
Sent: Friday, 12 March 2021 6:11 PM
To: PPO Engagement
Cc: eplanning.exhibitions@planning.nsw.gov.au
Subject: Webform submission from: Western Sydney Aerotropolis Draft Precinct Plans
Attachments: draft-aerotropolis-precinct-plan-submission---luddenham-landowners-consortium.pdf

Submitted on Fri, 12/03/2021 - 18:09

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Luddenham Landowners Consortium

Last name

C/ A Krilich

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Luddenham

Submission file

[draft-aerotropolis-precinct-plan-submission---luddenham-landowners-consortium.pdf](#)

Submission

Please ensure that this submission is noted as being made by the "Luddenham Landowners Consortium".

See attached submission.

I agree to the above statement

Yes

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MARCH 2021

DRAFT AEROTROPOLIS PRECINCT PLAN
SUBMISSION BY THE LUDDENHAM LANDOWNERS
CONSORTIUM

LUDDENHAM LANDOWNERS CONSORTIUM

DRAFT AEROTROPOLIS PRECINCT PLAN

INTRODUCTION

This submission is prepared in response to the exhibition of the *Draft Aerotropolis Precinct Plan* on exhibition by the *Western Sydney Planning Partnership*.

This submission is made by the **Luddenham Landowners Consortium** (LLC).

We thank the *Western Sydney Planning Partnership* in providing us with the opportunity to comment on the *Draft Aerotropolis Precinct Plan* (the **Draft Plan**) and our submission requests modification and changes to the *Precinct Plan* as noted in this submission.

RECOGNITION OF COUNTRY

The LLC agrees with the principles of recognising country and recognises the importance of Connecting to Country as noted in the *Draft Plan*. The LLC acknowledges the traditional custodians of the land and understands that planning for the Aerotropolis will seek to Connect with Country and Design & Care for Country.

Most of the LLC landowners have been custodians of their land for multiple generations and understand their lands character and attributes.

The comments and recommendations within this submission are based on some of these underlying objectives and characteristic of our land, and are based on recognising the original custodians, the current custodians of the land (the LLC) and all future custodians.

LUDDENHAM LANDOWNERS CONSORTIUM

The Luddenham Landowners Consortium (LLC) comprises of 19 land owners who own 23 properties. These properties are based on landholdings that were identified as **future employment lands** within the previous *State Environmental Planning Policy (Western Sydney Employment Area) 2009*.

The LLC collectively owns approximately 270 hectares of land adjacent to the western boundary of the Western Sydney Airport (WSA) site and extends west to a line close to the eastern edge of Luddenham Village (the Consortium Lands). The Consortia with interests in this submission are listed in the **Appendix**.

The general location of the Consortia in relation to the Western Sydney Airport is shown in the diagram on the following page (courtesy of Cardno).



The LLC has collectively provided comments previously for:

- *Stages 1 and 2 of the Aerotropolis Plan* (via Cardno). As part of this submission, an economic analysis of the LLC area was also undertaken by HillPDA;
- The *Mamre Road Precinct* exhibition (also via Cardno);
- The *Sydney Metro – Western Sydney Airport* project (which requested that access to the Airport Terminal Metro Station be provided to the *Agribusiness Precinct* land on the western side of the Airport);
- A submission concerning the further development of the *Luddenham Resource Recovery Facility* at 275 Adams Road, and also as noted as Item 14 of Figure 31 of the *Draft PIC*;
- Liverpool City Council and Penrith City Council *Draft Section 7.12 Contribution Plan*;
- The *Draft Place Based Infrastructure Compact (Draft PIC)* by the *Greater Sydney Commission*;

and for other matters associated with development with our lands and within the Aerotropolis.

Copies of all these submissions can be provided to the *Western Sydney Planning Partnership* upon request.

The LLC has been closely working with the NSW Department of Planning Industry and Environment, the *Western Sydney Planning Partnership*, the Western City & Aerotropolis Authority (Western Parkland City Authority) and other agencies with respect to the development of the *Agribusiness Precinct*, seeking a beneficial outcome for both Government and landowners.

This submission provides for feedback from the Consortia on the *Draft Plan* and some additional considerations that should be made in finalising the plan.

A background to the LLC position in relation to planning of the Aerotropolis and to our submission for the *Draft Plan* is provided below:

BACKGROUND TO THE DISTINCTIVENESS OF THE CONSORTIA LANDS

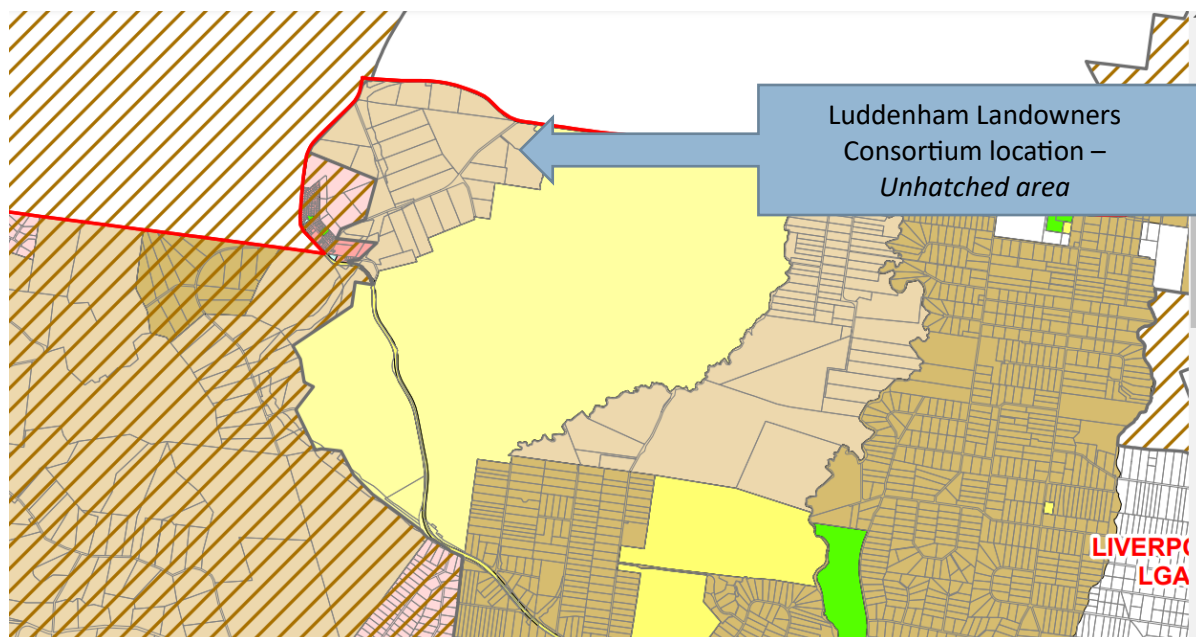
The distinctiveness of the LLC landholdings is required to be highlighted in considering this submission and the *Draft Plan*.

STRATEGIC PLANNING BACKGROUND:

The LLC is the **only part** of the *Agribusiness* Precinct and Agribusiness Zoned land that is **NOT** within the **Metropolitan Rural Area** (MRA) identified by the Western City District Plan.

The LLC is also the **only part** of the *Agribusiness* Precinct and Agribusiness Zoned land that was previously clearly identified as **future employment lands** within the previous *State Environmental Planning Policy (Western Sydney Employment Area) 2009*. No other Agribusiness zoned land was identified clearly as being *future employment land*.

The LLC landholdings were also subsequently the **only area** identified within the **Western Sydney Priority Growth Area**. The LLC landholdings were taken out of this *WSEA SEPP* by the *Aerotropolis SEPP*, and now form part of the *Agribusiness* Precinct along with other lands not originally identified for employment purposes (refer to LLC submission to the Dept. of Planning, Industry and Environment regarding the Mamre Road Precinct re-zoning under the *WSEA SEPP*).



Above – The LLC landholdings on western edge of airport and outside of Metropolitan Rural Area. Hatched area shows MRA for remainder of Agribusiness Precinct. Source: *Metropolitan Rural Area Exclusion Map – SEPP Seniors Living (Liverpool Map)*.

The LLC have consistently been emphasising this distinction between our Consortia landholdings and the remainder of the *Agribusiness* Precinct in our submissions. We believe that being the only part outside of the MRA, and by being previously identified as clearly future employment lands under the *WSEA SEPP* and the Western Sydney Priority Growth Area, that a different town planning hierarchy must apply to this land as it is **distinct from the other Agribusiness zoned land** now included with our Consortium lands.

We re-iterate these facts (again).

The eastern half of the LLC is also significantly the **only part** of the *Agribusiness* Precinct that is within the **Western Economic Corridor (WEC)** identified in the Western City District Plan.

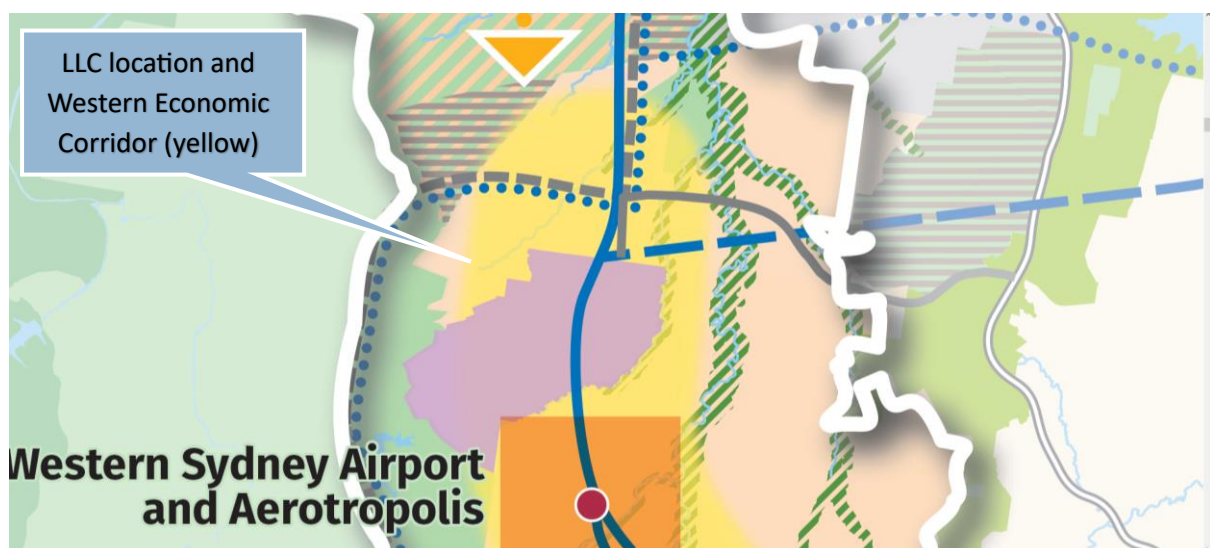
The Western Economic Corridors' significance in planning for regional Sydney is identified in *A Metropolis of Three Cities* by the *Greater Sydney Commission*. Details of this are found here (Objective 15):

<https://www.greater.sydney/metropolis-of-three-cities/productivity/well-connected-city/eastern-gpop-and-western-economic>

As stated in *A Metropolis of Three Cities*, "the delivery of a new Western Economic Corridor is integral to the approach of creating more jobs and a diversity of jobs in the Western Parkland City and the metropolis of three cities".

The LLC agree with this statement and the *Draft Plan* should recognise the development of the WEC within its planning framework - something that the *Draft Plan* does not do.

The Western City District Plan is also the reason why other areas, such as the *Aerotropolis Core*, are being developed in their chosen location and which the whole planning of the *Aerotropolis* is based on. Similarly, the WEC areas of the *Agribusiness* Precinct should **also follow this original plan**.



Above – The LLC landholdings on western edge of airport and the Western Economic Corridor (only location with the *Agribusiness* Precinct).

The *Draft Plan* (and other concurrent documents such as the *Draft PIC*) should be amended accordingly to recognise that the LLC area was identified in the Structure Plan for the Western City District **as being distinct from the remainder of the Agribusiness Precinct** during earlier stages in the overall planning processes for Sydney and should have the same consistency and planning hierarchy offered to other precincts of the Aerotropolis.

The *Precinct Plan* should therefore be amended to provide for a land use hierarchy appropriate for this higher use of the land originally envisaged, as compared to the remainder of the *Agribusiness Precinct*.

TRANSPORT CORRIDORS AND CONNECTIVITY:

The eastern half of the LLC is the only part of the *Agribusiness Precinct* that is within the Western Economic Corridor (WEC) identified in the Western City District Plan. This economic corridor was based on access to transport and the north-south rail link originally envisaged in the Western City District Plan along with other transport connections (such as the new The Northern Road, Elizabeth Drive and M12 Motorway– all within the LLC locale).

The *Draft Plan* does not adequately address the transport connectivity attributes of our land with respect to the road and transport connections for this area, and also the potential for access to a Metro Station within the Airport site and other transport networks.

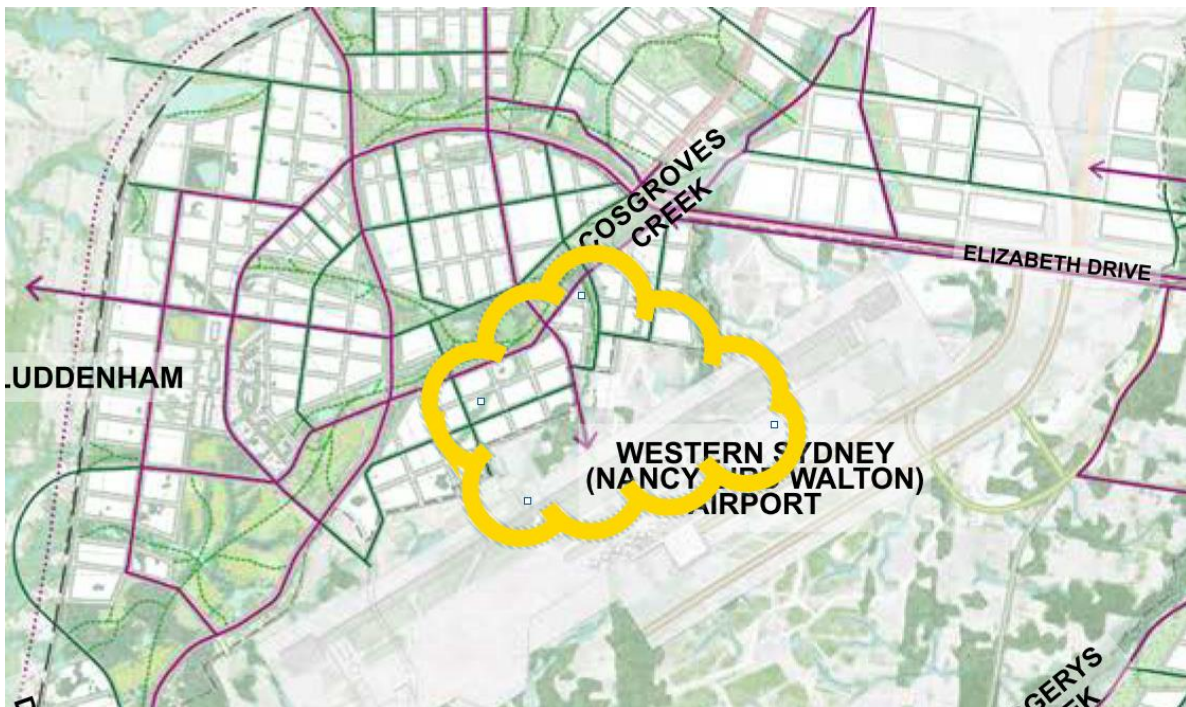
The LLC presented a submission in December 2020 to the *Sydney West – Western Sydney Airport Metro*. The main component of this submission was that consideration be made to accessing the **Airport Terminal Metro Station** directly for **pedestrians and cyclists** from the western public boundary of the Airport.

Public transport access to the *Agribusiness Precinct* for its thousands of workers of this area could therefore be achieved if access was provided to this Metro Station. This could be achieved (for example) by a pedestrian/cyclist tunnel under the runway and open pedestrian/cycle paths.

As shown in the *Active Transport Corridors* plan in Figure 20 of the *Draft Plan*, consideration for cycle path access to the WSA at Anton Road is proposed with a continuation of this path hinted in this diagram. This is shown in the extract on the following page (Principal Regional Cycle Path shown in purple).

It would only make sense that access to the Airport Terminal Station should be provided for both pedestrians and cyclists from this western boundary of the Airport.

As already stated, the *Draft Plan* (and the *Draft PIC*) does not address this potential for access to a Metro Station within the Airport site and the benefits that this could provide, along with other road transport networks.



There are **many benefits** from committing to such a proposal that were presented by the LLC in this submission. These included:

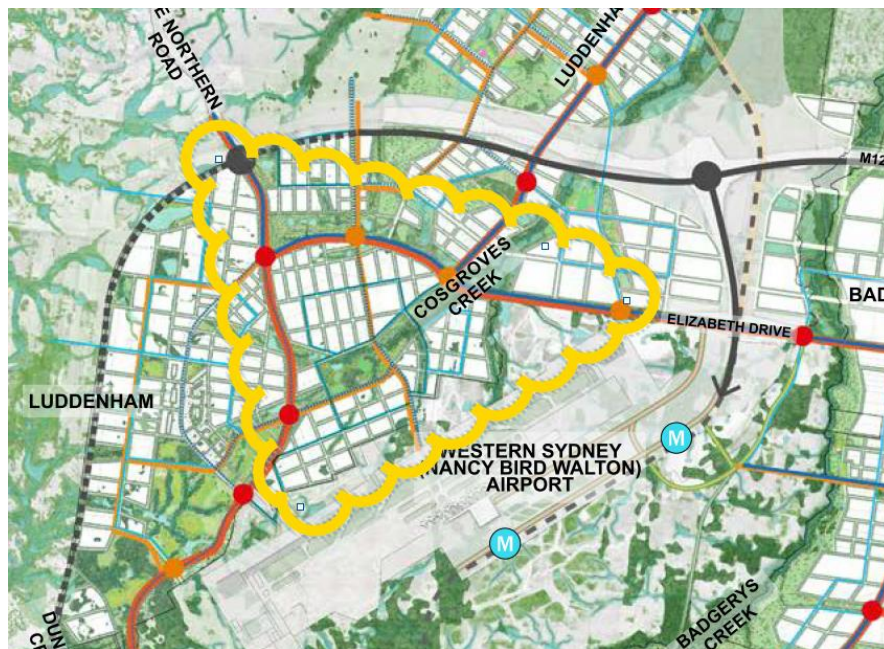
- The Airport Terminal Metro Station could be utilised and patronaged with workers of the nearby *Agribusiness* Precinct and existing residents of Luddenham. The Metro station would therefore not only rely on air travelers for patronage, but local workers.
- The proposal would allow for better achievements of the underlying principle for the Western Parkland City of a 30-minute city.
- It would directly connect the Agribusiness Precinct with the rest of the Sydney Metro system.
- The proposal would provide for a direct linkage of pedestrians/cyclists from the *Agribusiness* Precinct to other parts of the Aerotropolis.
- The proposal would provide for a fully integrated and connected Aerotropolis.
- It would especially provide for a direct linkage through to the Aerotropolis Core without traveling around the whole airport site.
- Bus services are noted in the *Draft Plan* as being on a principal route on Anton Road outside the WSA site. Pedestrians would therefore be able to utilise this bus connection with a Metro connection nearby.
- The connection through a part tunnel under the runway would be the most direct route and would be a very inexpensive/cost effective way of achieving direct and safe access to the public areas on Anton Road.
- It would better connect Luddenham and other suburbs and villages to the west of Luddenham into Sydney's Metro line system.

The LLC believes that this is a serious option and not considering it would be an enormous missed opportunity for development of the Western Parkland City and for the Aerotropolis.

Regardless of whether Metro access is provided or not, the LLC locale is still provided with the **best integrated road transport and freight access** arrangements within the Aerotropolis. This includes the following features:

- A new Northern Road and Adams Road/Elizabeth Drive/Old Northern Road signalized intersections and access;
- The connection of the Northern Road to the new M12 Motorway, just north of the LLC area;
- The connection of Elizabeth Drive to the new M12 Motorway, just east of the LLC area;
- The connection of the Northern Road and Luddenham Road to the existing M4 Motorway, north of the LLC area;
- The proposed Anton Road Nth connection to the western boundary of the Airport and to a new potential signalized intersection with Elizabeth Drive;
- The proposed/potential signalized intersection with Elizabeth Drive and Luddenham Road;
- Elizabeth Drive's unimpeded access and its intended upgrade, with access also to the M7 along Elizabeth Drive also present; and
- The intended Rapid Bus services along The Northern Road to Penrith.

This is clearly shown on the *Aerotropolis Transport Strategy Plan* presented in Figure 19 of the *Draft Plan*.



Road and access for transport and freight are not restricted to our area as compared to many other areas (such as the *Northern Gateway* where, for example, load limits on roads apply). Connections to the multiple Motorways for example, also eclipse other areas in the Aerotropolis, including the *Aerotropolis Core*.

The *Draft Plan* should recognise this fully and be altered to include the integrated road networks and the possible Metro access for the *Agribusiness Precinct*, along with other attributes of the area in part of it planning for the area.

FUTURE SERVICING OF AREA / WIANAMATTA-SOUTH CREEK CATCHMENT:

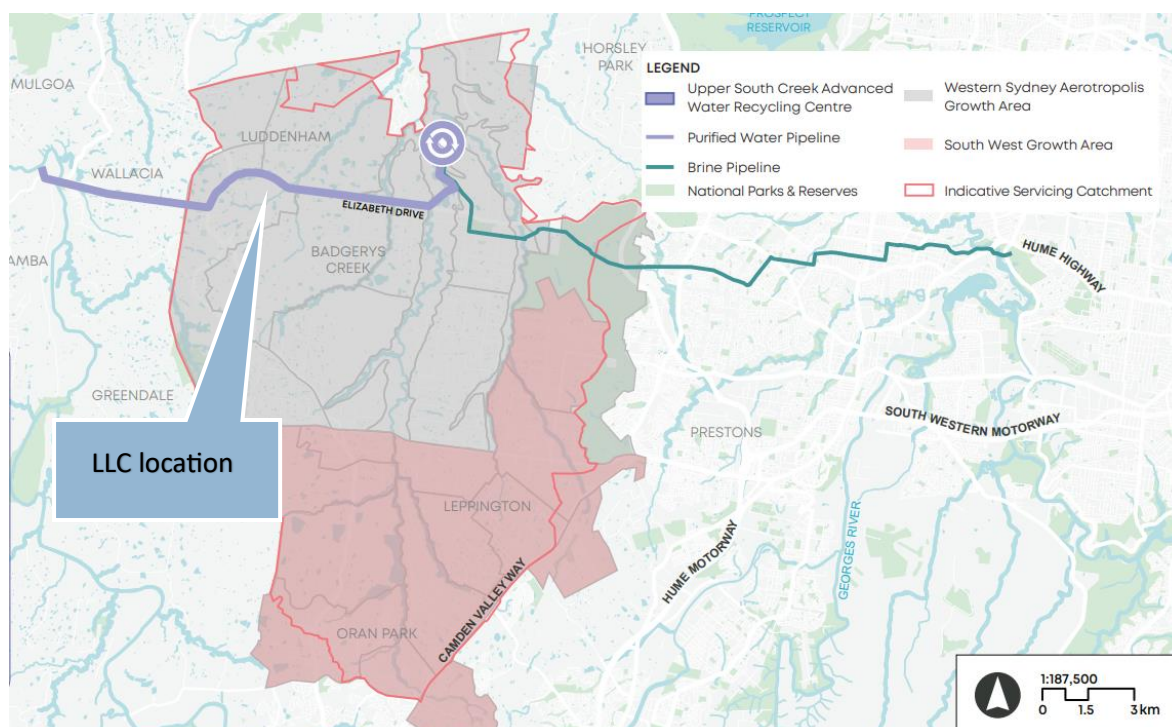
The future development of the LLC area is seen to be easier to undertake than the remainder of the *Agribusiness* Precinct. The site is contained wholly within the catchment of Cosgrove Creek which flows into the Wianamatta-South Creek Catchment area. The land use planning and sequencing of the area should therefore reflect this water catchment attribute of the land and the distinctiveness of this land to other *Agribusiness* Precinct lands.

The remainder of the *Agribusiness* Precinct is not within the Wianamatta-South Creek Catchment but within the Nepean River Catchment (for example, areas west of the original Northern Road).

Being within the **same water catchment area** as the remainder of the Aerotropolis, the LLC area is poised for servicing and connections for water, sewer, and recycled water. The LLC area is wholly within the Wianamatta/South Creek Catchment area that enables water and sewer servicing, as compared to the majority of the *Agribusiness* Precinct which is outside of the Wianamatta/South Creek catchment area.

Sydney Water have also recently identified their new **Advance Water Recycling Centre** in Kemps Creek along Wianamatta-South Creek. The LLC area in relation to this proposed network is seen on the attached diagram on the following page, with the northern boundary of our area shown as being serviced by recycled water/purified water pipeline.

Sydney Water have also identified that a future potable water reservoir would be located along Elizabeth Drive opposite the LLC landholdings, and that will provide for potable water to the Aerotropolis. Electricity, natural gas connections and 5g connections are also in place and available/nearby within the LLC area.



THE HEIGHT & BUILT FORM FRAMEWORK – BUILDING HEIGHTS 20-27M

The *Draft Plan* sets differing building heights across the Aerotropolis, with the Building Height across the LLC landholdings ranging from 10 to 20m. As explained previously, the LLC landholdings are distinct from the remainder of the *Agribusiness* Precinct. The allowable building heights should correspond to this distinctiveness of our area.

Land within the LLC landholdings and also the land identified in the Western Economic Corridor (WEC) part of the *Agribusiness* Precinct should be provided with a building height that distinguishes this area from the remainder of the *Agribusiness* Precinct (that is, not the same as the remainder of the *Agribusiness* Precinct).

A **building height of 20-27m** should be applied to the LLC area.

The LLC area should as a minimum, at least match the heights within the *Badgerys Creek Precinct* area heights (which also follows the identified WEC area), which in the *Draft Plan* are at **24m**.

The 20m maximum height is considered to not be a suitable height for limited developable area proposed while also maintaining high levels of landscaped areas/open space framework within the Aerotropolis. It should also be noted that the 60m wide Transgrid Easement across the LLC landholdings provides for a structure whose height is much higher than that proposed for buildings which will sit in the same area as this structure.

The Requirements listed under **Point LU4** of Part 3.4.3 of the *Draft Plan* should also be amended for the exclusion of the LLC land area from complying with “limiting height to within tree canopy heights” requirement for this specific land, as such a control is unworkable where tree canopy heights are minimal within our area, or are low in height where they are present.

The *Draft Plan* should therefore be amended to allow for a minimum **24m height** to this area of the *Agribusiness* Precinct, with higher heights within the WEC area also being potentially looked at.

THE HEIGHT & BUILT FORM FRAMEWORK – ENVIRONMENT & RECREATION ZONED LAND AND OPEN SPACE LAND

Figure 31 of the *Draft Plan* shows no building heights for the *Environment and Recreation* zoned land or land that is proposed within the Open Space Framework.

The *Aerotropolis SEPP* permits certain uses within the *Environment and Recreation* zoned land that to our knowledge would allow some types of buildings to be built. The *Draft Plan* does not recognise this.

The *Draft Plan* should be amended to allow for heights of buildings that would correspond with neighbouring buildings on Agribusiness zoned land adjoining these *Environment and Recreation* zoned areas and proposed Open Space areas.

THE BLUE-GREEN INFRASTRUCTURE FRAMEWORK – OPEN SPACE EXTENT OVER CONSORTIA LANDS

The *Draft Plan* proposes a vision for the Parkland City that includes large extents of parkland, riparian corridors and nature parks (Agri Park). The LLC area has many of these parks and corridors over their landholdings and the extent of these areas is considered to be large and onerous on many landholders.

As explained previously, the LLC landholdings are distinct from the remainder of the *Agribusiness* Precinct (such as the Western Economic Corridor over parts of the Consortia lands). The open space extent over the Consortia lands should **correspond to this distinctiveness of our area**, and with what has previously been envisaged for our lands prior to the preparation of the *Draft Plan*.

This process of preparing this *Draft Plan* (and the supporting documents) have not considered the existing long term landowners. The *Draft Plan* has not been people-centric and has lacked an individualised approach to the proposed impacts on landowners and their needs. This needs to be urgently rectified so that land owners can have certainty.

The issue of acquiring landowners' properties for open space, for example, has not been addressed in the *Draft Plan*. There is no mechanism for engaging with individual landowners, acquiring private land for parkland or other public purposes or timeframe to realise "the vision". The concept of developers providing the land for the Agri Park and other open space is also not considered feasible.

Enhancing, conserving and preserving the land, establishing some riparian corridors and enhancing the Luddenham Village are supported along with the overall concept of the Parkland City. However, this should not be borne by individual landowners. Any land to be used for open space in the *Agribusiness* Precinct must be **acquired and owners compensated fully for their loss**.

The Blue Green Infrastructure plan sees some existing landowners benefiting from the opportunities the *Agribusiness* Precinct allows them, and yet neighbouring properties are partially or wholly swallowed by the Agri Park or other open space. This is disenfranchising those owners and the *Draft Plan* doesn't take this into account nor address this adequately. It is also noted that lands allocated to the 3 main parks far exceed the requirements identified in the *Social Infrastructure Needs Report*.

Landowners and the community spent two years working out and commenting on the zonings of the *Aerotropolis SEPP*. Their land was zoned accordingly, and some land was noted as open space/riparian land being the *Environment and Recreation* zoned land. The *Draft Plan* radically changed this Open Space Framework. Why has this process occurred in this manner?

The *Western Sydney Planning Partnership* should have been upfront about the extent of open space required for the Parkland City at the early planning stages (ie. in the *SEPP*). The resultant community anger over this (such as large public meetings and negative media coverage over this *Draft Plan*) is a result of this process.

Another matter that the *Draft Plan* fails to address is whether the *Draft Plan* will amend the zonings applying to people's land? To our knowledge, nowhere in the *Draft Plan* is the community advised that this will occur – that their zonings will change to correspond to the *Draft Plan's* open space framework when adopted. Discussions with the *Planning Partnership* (ie. 'Talk to a Planner' sessions) revealed that this will occur. This however isn't stated anywhere in the *Draft Plan*.

The methods for the determination of much of this open space network is also questioned by the Consortia. For example, the *Undisturbed Soil Network* plan in Figure 14 is not correct, but its extent seems to be a justification for the open space extent of the *Draft Plan*. Many of the landowners of the LLC have been long term farmers of their land and the extent of the 'disturbed soil' is known by them and was a basis for much of their farming life. Evidence for the disturbance of the soil is available. The extent of undisturbed soil areas on many of these landholdings presented by this *Plan* is therefore wrong. Other justifications and assumptions made by the *Draft Plan* are therefore also questioned as to their accuracy.

The LLC also notes that the network of parks and large bodies of water may significantly affect the wildlife buffer zones around the Airport and increase the potential for bird strike due to the extent of parkland and open space next to the airport. This matter has also been significantly raised by the media during the exhibition period of the *Draft Plan*.

THE TRANSPORT FRAMEWORK – ROAD ALIGNMENTS AND PATTERNS

The LLC request that the transport framework within the LLC area be worked out further amongst landholders for the best outcome for property owners as part of a masterplanning process for our area. The fine tuning of road alignments and layouts can therefore occur at this future stage.

It is evident that there have been many options for street alignments and design for this particular area of the *Draft Plan*. Alternative road designs are noted as being shown within the exhibited *Draft Plan* – These are shown, for example, in Figure 9 and Figure 16 – Which show a different alignment of Anton Road Nth than seen in the remainder of the document.

There are some examples of how this road network could be re-worked and looked at in more detail. Road layouts could more closely follow the existing alignments of the boundaries of existing lots within the LLC and have some recognition of these lot boundaries, where practical.

The extension of Anton Road Nth towards Elizabeth Drive and the *Northern Gateway* for example could look at a re-alignment to follow more closely the existing lot boundaries and possibly a parallel alignment with the 60m wide Transgrid Easement. The 60m Transgrid Easement that crosses the LLC area is significantly constructed with a due north orientation across this section (and the only section)

of the Aerotropolis, and the road network parallel with this easement area should be undertaken in this area.

By investigating the re-alignment of Anton Road Nth and other road layouts, a better outcome for subdivision of the LLC landholdings could occur and which would involve minimal change to the remainder of the Precinct.

THE TRANSPORT FRAMEWORK – 60M WIDE TRANSGRID EASEMENT

The area of the 60m wide Transgrid Easement provides for multiple opportunities in the design of the Precinct that would make better use of this 60m wide area. The *Draft Plan* does not adequately address this easement area, the significance of this large structure on the layout and appearance of the Precinct, nor the potential benefits of this easement area.

The 60m Transgrid Easement that crosses the LLC area is significantly constructed with a due north (and south) orientation across this section (and the only section) of the Aerotropolis, and the road network parallel with this easement area should be undertaken in this area. The due north orientation of this easement also provides some visual recognition within the area, and combined with a suitable road alignment, could even have some pilotage benefits for the nearby Airport.

Some of the benefits of this area include the cleared nature of this area (with no trees or significant vegetation – or allowed plantings) and the overall height of the easement above ground levels. The benefits of the overall height of the easement wires needs to be acknowledged, with a much higher ground level to wire height present under this easement across the LLC landholdings, as compared to many other areas in the Aerotropolis. Tower 508 for example located on Lot 1 DP 220176 has a height of 37.6m above ground level (as advised by Transgrid) and the *Height Plan* for buildings in Figure 31 should reflect this existing structure height.

This area could also be designed for **freight truck parking in a compatible street pattern** that would offer loading/unloading opportunities or parking pending connection to freight and logistic businesses either side of this easement area. The area could be combined with larger freight/logistics operations while maintaining and not affecting the easement for Transgrid's requirements (Transgrid allows for parking of vehicles up to 4.3m high, which also corresponds to the NSW Heavy Vehicle height for general access heavy vehicles).

As an area that allows for limited development and landscaping, the area could be made as permeable paved parking areas for freight trucks, combined with some suitable low height landscaping.

Many changes are occurring and will occur to the freight logistics and the trucking industry in the near future. Electrification, automation and digitalisation are all occurring and the *Precinct Plan* needs to recognise this smarter future. The area of the Transgrid easement along with parking and freight handling, could for example incorporate **electric charging of electric trucks** and vehicles. *Transfer hubs* as part of truck logistics is an example that the Transgrid easement could also be used for.

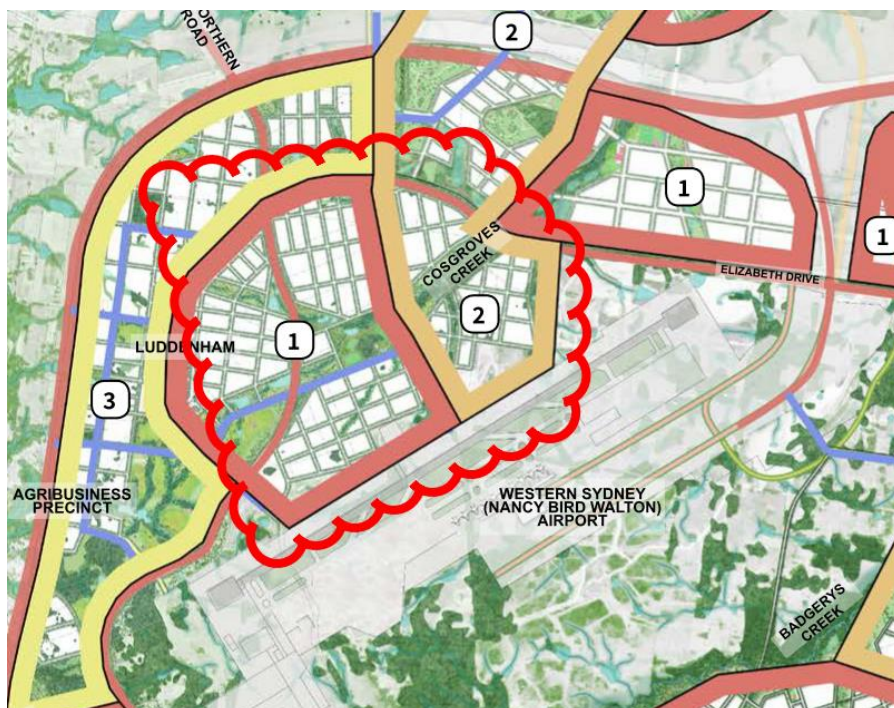
The underground placement of the line, if economical in the future, could therefore also occur without restricting the land and opportunities surrounding the land.

The *Draft Plan* should be amended to recognise the benefits of the Transgrid Easement to the area and provide for a street pattern, neighbouring building heights and opportunities to allow for the development of this valuable easement area.

SECTION 5 – SEQUENCING PLAN AMENDMENT

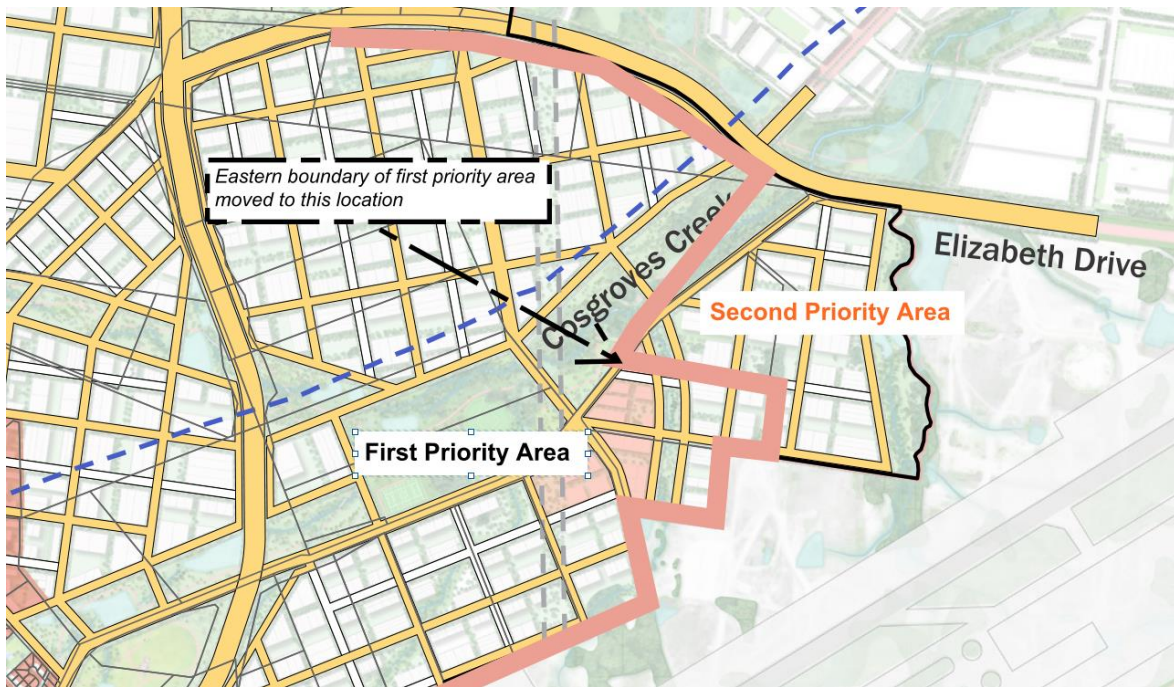
The sequencing plan for the LLC area is shown in the Figure 66 of the *Draft Plan* in Section 5. This sequencing plan is based on the *Draft PIC*.

The LLC has made a **separate submission** to the *Greater Sydney Commission* on the sequencing arrangements within the *Draft PIC*. A copy of this submission can be provided upon request.



The LLC requested an **amendment to the sequencing plan** to the *Greater Sydney Commission* and similarly requests the *Western Sydney Planning Partnership* to amend this sequencing plan.

The high-level sequencing arrangements for this area of the *Agribusiness Precinct* should be altered to align with an **amended sequencing plan** as shown below:



The reasons why this amended sequencing plan is favoured is as follows:

- The Sequencing Plan within the *Draft Plan* (and the *Draft PIC*) is not consistent with the Structure Plan adopted with the Western City District Plan. The amended Sequencing Plan shows consistency with the Western Economic Corridor (WEC) identified in the Western City District Plan and more aligns with the Structure Plan adopted with the Western City District Plan.
- The amended Sequencing Plan follows the Luddenham Landowners Consortium landholdings and all landholders agree on this submission. The LLC has endeavored to work with the NSW Government at all times in delivering the Aerotropolis and the envisaged *Agribusiness* Precinct. By placing this Consortium into two separate areas, further collaborative work with Government would potentially not be possible/cease.
- The land shown is outside of the Metropolitan Rural Area, which is the only area in the *Agribusiness* Precinct not within the MRA.
- The land was previously identified as *future employment lands* within the previous *State Environmental Planning Policy (Western Sydney Employment Area) 2009*. No other *Agribusiness* zoned land was identified clearly as being *future employment land*.
- The amended Sequencing Plan allows for further development of the Luddenham Resource Recovery Facility on Adams Road (if this was approved). This facility was identified as *Item 14 of Figure 31* of the *Draft PIC*. This area therefore remains within future areas for release and would allow for the gradual transformation of this business and allow it to continue to operate (as envisaged by the *Draft PIC*).
- The area is poised for servicing and connections for water, sewer, and recycled water. The LLC area is wholly within the Wianamatta/South Creek Catchment area that enables water, recycled water and sewer servicing, as compared to the majority of the *Agribusiness* Precinct which is outside of the Wianamatta/South Creek catchment area. Electricity, natural gas connections and 5g connections are also in place and available/nearby.
- The amended Sequencing Plan would allow for the critical consideration of the Luddenham Road/Elizabeth Drive intersection to be worked out in the initial development of the area. Without this, access to the *Northern Gateway* via Luddenham Road (as the only road connecting the *Northern Gateway* to Elizabeth Drive) would be delayed until much later.

- The *Draft Plan* has not considered the potential for access to the *Sydney West – Western Sydney Airport Terminal Metro Station*. The amended Sequencing Plan allows for potential consideration of access to the Western Sydney Airport Terminal Metro Station for pedestrians and cyclists from the western boundary the Airport. The Sequencing Plan has not addressed this huge potential that could occur with Metro access for the *Agribusiness* Precinct and which should be enabled.
- The *Draft Plan* has not considered the other road transport connections that will occur to this locality. The LLC landholdings are the best road transport connected landholdings within the entire Aerotropolis. The Northern Road access along Adams Road to Anton Road (and the new Anton Road), Elizabeth Drive (and upgrades that will occur) along with the proposed operational M12 Motorway connections are all within the locale of the LLC lands and the Sequencing Plan needs to address this synergy of road infrastructure.

The *Draft Plan* should therefore amend the *Sequencing of the Initial Precincts* plan within in Figure 66 in the manner shown in this submission for better use of the land on the western boundary of the airport.

OTHER MATTERS NOTED IN THE DRAFT PLAN

The following additional matters are noted as requiring further confirmation and amendment of the *Precinct Plan*:

- The acquisition for roads (especially in conjunction with open space) should be limited to areas where the acquisition of peoples houses is not affected and for a consideration of peoples homes. For example, Adams Road is shown as 40m wide road and the plan would mean the loss of houses along Adams Road. The acquisition of land for roads needs to be carefully worked out in the *Precinct Plan* with landholder input in this process.
- The *Interactive WSUD Drainage Basin Locations* shown in Figure 12 of the *Draft Plan* need clarity on correct and required location of all basins. There are some basin locations outside of the Open Space Framework of the *Draft Plan* and some in areas that are hilly area/not completely within a drainage area. These basin locations should be clarified and where not necessary, removed.

CONCLUSION

The Luddenham Landowners Consortium hopes that this submission will be considered favorably.

We again thank the *Western Sydney Planning Partnership* on the opportunity to comment on the *Draft Aerotropolis Precinct Plan* and hope to continue to work together in the future delivery of the Aerotropolis.

AUTHOR

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APPENDIX

The Luddenham Landowners Consortium comprises of 19 land owners who own 23 properties. These properties are based on landholdings that were identified as **future employment lands** within the previous *State Environmental Planning Policy (Western Sydney Employment Area) 2009*. Some individual landowners also hold larger areas on these holdings than specified below which are outside of this *WSEA* defined area. The members are as follows:

Address	Legal Title	Area (Ha)
2600 Elizabeth Drive, Luddenham	Lot 1 DP 220176	11.62
2550 Elizabeth Drive, Luddenham	Lot 2 DP 220176	11.61
2680 Elizabeth Drive, Luddenham	Lot 9 DP 1240511	11.33
2448 & 2450 The Northern Rd, Luddenham	Lot 8 DP 1240511	7.77
2422-2430 The Northern Rd, Luddenham	Lot 7 DP 1240511	10.28
2422-2430 The Northern Rd, Luddenham	Lot 6 DP 1240511	13.27
2422-2430 The Northern Rd, Luddenham	Lot 5 DP 1240511	13.52
140 Adams Road, Luddenham	Lot 4 DP 1240511	14.20
140 Adams Road, Luddenham	Lot 3 DP 1240511	15.86
180 Adams Road, Luddenham	Lot 30 DP 1251450	15.12
230 Adams Road, Luddenham	Lot 106 DP 846962	43.71
2382 The Northern Road, Luddenham	Lot 1 DP 232996	16.18
2310 The Northern Road, Luddenham	Lot 2 DP 827223	12.95
2292 The Northern Road, Luddenham	Lot 2 DP 1240511	9.06
90 Adams Road, Luddenham	Lot 2 DP 519034	1.01

65 Adams Road, Luddenham	Lot 9 DP 1240153	7.04
40 Eaton Road, Luddenham	Lot 4 DP 1234822	9.31
70 Eaton Road, Luddenham	Lot 70 DP 1091926	6.88
105-115 Adams Road, Luddenham	Lot 10 DP 1240153	9.51
145 Adams Road, Luddenham	Lot 5 DP 250030	10.12
1 Anton Road, Luddenham	Lot 1 Sec C DP 1451	6.88
205 Adams Road, Luddenham	Lot 2 DP 623799	10.12
25 Adams Road, Luddenham	Lot 1 DP 215715 Lot 1 DP 1234822	2.18
Total Area		269.53 Ha