

26 August 2020

NSW Department of Planning, Industry & Environment

Locked Bag 5022

PARRAMATTA NSW 2124

RE: LUDDENHAM RESOURCE RECOVERY FACILITY (SSD-10446)

Dear Sir/Madam,

The following submission relates to the proposed development of 275 Adams Road, Luddenham. Named as the 'Luddenham Resource Recovery Facility'.

The Luddenham Landowners Consortium

The Luddenham Landowners Consortium (the LLC) collectively owns approximately 270 hectares of land adjacent to the western boundary of the 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 LLC has provided comments previously for Stages 1 and 2 of the Aerotropolis Plan and for the Mamre Road Precinct exhibition (via Cardno). 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 and other agencies with respect to the development of the Agribusiness precinct, seeking a beneficial outcome for both Government and landowners.

Some consortium members are listed within Section 5.1 (Community Consultation) of the Environmental Impact Statement. All LLC members have agreed to this joint submission. Individual specific submissions may also be provided by landholders within the consortia.

This submission relates to the LLCs overall concerns for the Luddenham Resource Recovery Facility as proposed adjacent to our consolidated lands and the effects on future development of these consolidated lands.

Concerns regarding the Proposed Development

The LLC's main concerns are summarized as follows:

- The development will impact on future development envisaged by the LLC and the development is not in accordance with Aerotropolis SEPP and Aerotropolis Plan.
- The LLC has requested higher order land uses as part of the Agribusiness precinct and land zoning in its submission to Stage 2 of the Aerotropolis. The proposed use of the site as a 'resource recovery facility' for non-agribusiness uses is not a higher order land use or permissible proposed land use.
- The proposed use could potentially significantly hinder other future higher order or permissible land uses on the adjoining Consortium lands and significantly affect the economic value of the Consortium lands.
- The proposed development would not be permissible under future land use zones of the Aerotropolis SEPP for both the Agribusiness zone and Environment and Recreation zone.
- The proposed development would not achieve the future land use objectives of both the Agribusiness zone and Environment and Recreation zone.
- The development will potentially impact the Precinct Planning process currently occurring for the Agribusiness precinct. The development would have a major impact on Precinct Planning and the timing/staging of development within the Precinct.
- Conflict with airport operations and potentially, land uses promoted around the airport (such as a freight and logistics hub) would occur with the development.
- The development would not comply with the Western City District Structure Plan for the area, which identifies this land and the Consortium lands as being within an *economic corridor* for development of the future City and land being identified as being a land release area under the Structure Plan.

Other concerns noted with the proposed development would also affect Consortium lands. Many of these concerns appear to have been raised by other authorities and agencies in pre-DA advice and consultation. Some of the additional concerns that would affect the Consortium lands include:

- General environmental concerns over the development (noise, air quality, and water quality impacts).
- The suitability of Adams Road for proposed traffic movements/numbers and access concerns.
- The effect on current residents and businesses on Consortium lands of the development operations.

Conclusion

We request that the Department of Planning, Industry & Environment consider this submission to the proposed Luddenham Resource Recovery Facility.

The **Luddenham Landowners Consortium** looks forward to continued liaison and consultation with the Department for delivery of the Aerotropolis and development of our Consortium lands.

Anthony Krilich & Paul Buhac

For and on behalf of the Luddenham Landowners Consortium

APPENDIX

The Luddenham Landholders Consortium, 19 Landowners (23 Holdings) - 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