

Planning Strategies, Housing & Infrastructure
Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2001

Dear NSW Planning and Infrastructure

Re: The Proposed Western Sydney Employment Area - Objection

I wish to object to the inclusion of the village and environs of Luddenham in the proposed Western Sydney Employment Area (WSEA) for a number of reasons. I also wish to maintain my privacy by not having my personal details included in any publication of submissions.

The grounds of my objections are:

- ⤴ Lack of consideration of the village of Luddenham as an entity;
- ⤴ Exclusion of Twin Creeks from the WSEA and consideration of that development as the only residential development in the area;
- ⤴ Destruction of community;
- ⤴ Reduction of green zones and impact on visually significant ridges along the Northern Road;
- ⤴ Reduction in critical food bowl land in close proximity to Sydney;
- ⤴ Large focus of the WSEA on industrial development when the growth in employment is in the services and health industries, education, boutique agriculture and food production.
- ⤴ Employment hubs are not proven to work in reducing travel time for residents.
- ⤴ Limitations of future residential opportunities which impact on existing small landowners and residents of the Luddenham village and surrounds.

Further, I submit that the village and environs of Luddenham should be excluded from the WSEA and buffered from the employment lands as a sensitive area due to residential and educational activities already extant in the village and the visual significance of the ridges (refer pages 13, 28, 36 of the ***Plan***) as well as ensuring effective management of the natural, social and cultural values of the area.

I also submit that should an Outer Sydney Orbital corridor be under consideration it should not be considered for location on the western edge, running through Luddenham (see page 42 of the ***Draft Structure Plan***), but on the eastern edge through the Commonwealth land for the proposed second airport.

1. Luddenham Village

The documentation does not acknowledge, in any way, the village of Luddenham and its immediate environs, which starts from just outside Bringelly, runs along the Northern Road, down Adams Road, Park Road and Elizabeth Drive and takes into account a significant number of homes on small residential blocks, through to housing on larger acreages (see for example, page 30 of the ***Economic Issues and Drivers Study***). There is also land zoned as town land along Adams Road running behind Eaton Road.

There has been gradual enlargement of the village over the past 3 decades with new housing currently being built along and adjacent to Jamison Road. However, to read the documentation, one would be forgiven for thinking there is nothing there.

The Study (p14) states the need to separate the employment lands from sensitive land uses such as residential development and also educational facilities. Yet, the village of Luddenham and its environs has residential development, two schools and a childcare facility and these are included in the study area and residences are included in the proposed boundary-adjustment area.

The segmentation of the village along the Northern Road would serve to sever the village in two.

2. Historical significance

- a) Luddenham has recently celebrated its 200th anniversary, having been settled in 1813. It is a small village and is currently expanding to include new residential development within the confines of the zoned residential town land.

The three churches, one dating from the 1870's, the Progress Hall, Showground and school (the oldest current building dates from 1914 but the school itself goes back to the 19th century) form the hub of the village.

- b) There are few villages left in the region and there are strong ties within the community, especially between the longer term residents and families, some of whom are original founding families. This WSEA proposal treats the area as if the residents are few and far between, with no ties to the land or the community in which they live. This is not the case.
- c) The assertion within the documentation that Twin Creeks development is the only significant residential development in the area is both insulting and uninformed. Twin Creeks has only recently been developed, it is on the far outskirts of the area and, in fact, is not in any way connected with the village of Luddenham. It's links are more likely to be to the St Marys or St Clair areas.
- d) My family has lived in Luddenham since the mid 1870's and in the immediate region since the mid 1850's, with connection to Sydney and NSW since first settlement. Proposals such as the WSEA treat our villages and the land as if it is *terra nullius* and the families who settled there and continue to live there as if there is nothing important, special or meaningful about the village and surrounding countryside. This is not the case to the people who live there.

No doubt for people with no connection to any particular place or community, where people are constantly mobile and houses are mere accommodation, the feelings of strong connection and engagement with an area would appear to be without merit and beyond their experience. However, the reason we live in the region or return often and maintain a strong attachment is because of the deep and personal connection to the land, the community and the desire to maintain that connection.

- e) Sydney and its environs has been so denuded of historical buildings, properties and landscapes that residents have to travel to historical villages outside of the Sydney area or interstate to get a sense of our connection with the history of the countryside. In Luddenham we are an endangered species and community as every time there is a need for something in the greater Sydney area, the land in this area is proposed – whether it's for dumps, cemeteries, airports, transport hubs etc.

3. Community development

Governments and councils are constantly attempting to build a sense of community and cohesion in residential developments and suburbs throughout the country in order to build a positive environment, maintain safety and promote a sense of well-being and belonging amongst the residents. Consequently, it is bizarre that a community which is intact, with some recent expansion in the past few decades, should be considered only in terms of development, industrialisation and legislative requirements regarding environmental impacts or endangered species.

This is an existing community which should be able to remain in place, in the area we love, without the threat of major industrial and infrastructure development.

4) Green zones and food production

a) The documentation labels agricultural and pasture-land as “degraded” through previous use. It appears, from the documentation, that the only inherently “valuable” land in the minds of the planners is that which is considered to be either environmentally significant, or able to be developed for residential or “employment” purposes.

- b) This does not take into account the increasing need in our state for green zones, buffers and other rural or semi-rural areas. The move to develop remaining verdant agricultural, farming and small semi-rural villages for industrial and residential development is not consistent with the need to offset the ever growing development within the Sydney basin.
- c) The landscape is visually significant within the Luddenham village and environs, particularly north-west of Northern Rd and also south east across the slopes towards St Clair.
- d) The adjacent land to the Luddenham village is home to black Swans, Ibis, Superb Wrens, Plovers, Ducks, hawks, snakes, hares, the occasional Echidna and other wildlife, despite this being pasture-land and considered “degraded” by previous use.
- e) There is also an increasing need for food production closer to the source, to reduce the “food miles” our food travels and to reduce the reliance on imports and the high transportation costs. The Sydney basin has been a fertile region over the past two centuries, yet successive governments have gradually built over its prime agricultural land thus pushing the food production further out to more marginal land and requiring the use of more water, fertilisers and increasing the costs associated with that food production. The WSEA should be considering the need for increased agricultural and primary production areas which would then assist in being heat “sinks” and also producing food.
- f) The only infrastructure provided is the road, garbage collection, electricity, phone connection and town water. As such, services provided by local and state government for provision of infrastructure in this area have always been at the lower end of service provision. Yet the village of Luddenham remains a highly desirable place in which to live and continues to undertake primary production activities.

5) Concept of hubs meeting employment and residential needs

The concept of building employment hubs closer to residential areas to allow residents employment opportunities close to their homes appears a valid assumption but does not work in practice. There are a number of reasons for this.

- a) Firstly, it assumes that the jobs and industries will be a match for the residents. Given the proposal for the majority of the positions to be in the warehousing, transport and infrastructure industries, especially in the first instance, assumes the majority of western Sydney residents are homogenous in their skills and qualifications. This is not the case. Residents in the Luddenham township and environs are diverse, ranging from university qualified professionals, those who work in government departments, small business people, those engaged in agriculture and primary industry, child care and retirees, to name a few (see section 5 below).
- b) Secondly, it assumes the people who may secure employment in the area will wish to live near to their employment. Some may, but given that people choose where they live because of a range of variables, this may only affect some people. People choose to live in particular locations because of proximity to family, lifestyle choices, housing costs, life stage, medical or personal support needs, education options, caring responsibilities and so on.

A prime example of this is Canberra. I have experience of living and working in Canberra. Walter Burley Griffin planned a number of town centres and hubs with the concept that people should never need to live on an outer perimeter and commute to a CBD from a dormitory suburb. Hence, the town centres and hubs were envisaged as places that people could live and work within the same immediate location. However, in reality the majority of Canberrans live in their chosen suburb or areas for a range of the reasons listed above and commute to work in a town centre/hub outside the area in which they live. This is due to the fact that moving jobs will often mean moving from one town centre to another and people do not tend to move house every time they move jobs. Hence the ACT government has continued to increase road infrastructure and public transport to assist residents to commute to and from their workplaces.

6) Future work requirements

The *Economic Issues and Drivers Study* by Urbis, rightly outlines the current global and national trends in economic development and participation, namely a move away from manufacturing and industrial technologies towards service industries including health, community and other services.

- a) According to the most recent Census, 51.9% of residents in the greater Luddenham SSC area work in managerial, professional, community/health and clerical/administrative work, 10.5% in sales, 14% in trades/technical and 20.9% in machinery operation/labouring. This means more than half of residents are in the expanding employment categories and a further 10% in retail, totalling around 63% of residents.
- b) The suggestion that the WSEA will, through the provision of opportunities for warehousing, transport/logistics and industrial enterprises, somehow meet the need for jobs for local residents into the future does not take into account the demographics of current residents or of the transition already taking place to a service economy.
- c) The emphasis on meeting resident's job needs in the documentation seems like a marketing exercise to play on the fears and hopes of some western Sydney residents. If we take the current Luddenham demographics as an example, the likelihood is that only some may find work in the WSEA and that many would still commute to work to other parts of the city or its conurbation.
- d) The study states the future employment needs for Western Sydney should focus solely on

industrial, warehousing and transport/logistics. This does not take into account the clear employment transitions which are already showing up in the recent Census, to a more service based economy. As such the vision appears stuck in current misconceptions about who lives in western Sydney, rather than moving into the smarter economy and services options.

The Study states (page 8) that manufacturing will continue to grow, albeit at a slower rate than other sectors. This seems to run counter to the analysis of the transitions occurring across the national and state economies and hence seems to lock western Sydney into “old economy” thinking rather than looking forward to the smarter services sector, especially given the global trend of manufacturing moving to developing economies. This maintains the CBD-centric view that the west is a homogeneous, lower skilled, lower “class” region which is “out there” and therefore ripe for exploitation whether as blue collar workers or as the terra nullius where proposed infrastructure will cause no disruption or concern.

Even the view (p. 10) that there is no need for anything in the way of retail except low end services stations, take-aways and other convenience retailers to service the workers, denies the needs of the people who live here already and utilise Penrith, St Marys, St Clair or Narellan centres for their needs.

- e) The huge amount of land proposed for industrial purposes also runs counter to the economic trends and suggests the government is quarantining land or perhaps even “land banking” when in fact there may be no real need for the amount of “industrial” land suggested. The study itself admits this amount of land far exceeds that considered necessary.
- f) The suggestion that the only significant historical agricultural pursuits in the area have been poultry farming and horticulture, is also not correct. Dairy farming, cattle farming, market gardens and other primary production enterprises have been and continue to be undertaken, albeit on a smaller scale in recent years.

7) Limitations on Residential Opportunities

The documentation indicates that if placed within the WSEA there would be no future opportunities for residential development. Yet this region is growing at around 4% per annum, not all the land may be needed especially with the re-setting of the economy away from industrial and manufacturing, despite what the study says. However, placing this land into the WSEA effectively denies current and future residents, over the next 33 years, to realise the full potential of their properties should they wish to do so whether on small house blocks or small acreages.

For most people, their house and small land holding is their only asset and the reduction of their capacity to realise the asset or to use it in the way that maximises their well-being will fundamentally impact on their capacity to maintain themselves, their income or future options. It appears that this proposal advantages large landowners/developers but doesn't take into account those residents with smaller land holdings.

Therefore, I strongly object to the WSEA and submit that the Luddenham village and environs be excluded from the WSEA and buffered from employment lands.

Yours sincerely

