

[REDACTED]

From: system@accelo.com on behalf of Anthony Krilich
Sent: Friday, 2 November 2018 2:38 PM
To: [REDACTED]
Subject: Submission Details for Anthony Krilich (comments)
Attachments: 292074_LUIPP Submission_[REDACTED].pdf; 292074-[REDACTED].pdf

Confidentiality Requested: no

Submitted by a Planner: no

Disclosable Political Donation:

Agreed to false or misleading information statements: yes

Name: Anthony Krilich

Email: [REDACTED]

Address:
[REDACTED]
[REDACTED]
[REDACTED]

Content:

Please refer to uploaded submission.

Regards

Anthony Krilich

IP Address: - [REDACTED]

Submission: Online Submission from Anthony Krilich (comments)
https://majorprojects.accelo.com/?action=view_activity&id=292074

Submission for Job: #9552
https://majorprojects.accelo.com/?action=view_job&id=9552

Site: #0
https://majorprojects.accelo.com/?action=view_site&id=0

[REDACTED]

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[REDACTED]

[REDACTED]

1 November 2018

Lenko Krilich

Director – Aerotropolis Activation
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

WESTERN SYDNEY AEROTROPOLIS LAND USE AND INFRASTRUCTURE
IMPLEMENTATION PLAN – EXHIBITION COMMENTS

Dear Director,

Please find attached my submission concerning the LUIPP for my property at:

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Please consider my request as presented in the report prepared by Anthony Krilich, as attached.

Regards

Lenko Krilich

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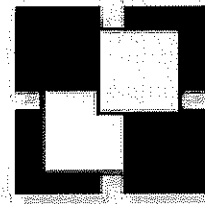
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REPORT NO. J06-043/A

NOVEMBER 2018



benchmark
BUILDING CERTIFIERS

[REDACTED]
[REDACTED] – REQUEST FOR
**INCLUSION INTO NORTHERN GATEWAY OF
THE WESTERN SYDNEY AEROTROPOLIS**
**REPORT FOR THE DEPARTMENT OF PLANNING &
ENVIRONMENT**

PREPARED BY: ANTHONY KRILICH

BENCHMARK BUILDING CERTIFIERS

REQUEST FOR INCLUSION INTO NORTHERN GATEWAY OF THE WESTERN SYDNEY AEROTROPOLIS

SYNOPSIS OF REPORT RECOMMENDATIONS:

This report is prepared on behalf of Lenko Krilich of [REDACTED] being an individual land owner within the land identified in "Western Sydney Aerotropolis – Land Use and Infrastructure Implementation Plan – Stage 1" (the "LUIIP").

In summary, the report proposes a change to the draft LUIIP Structure Plan for the subject site from the current proposed 'Agriculture and Agribusiness' precinct, to the 'Northern Gateway' precinct and for the designation of the site as **Flexible Employment**.

The subject site and area comprise of attributes that are considered to be equal to or that surpass those of the Aerotropolis Core and other areas of the Northern Gateway, and the exclusion of this site from the functioning of the Western Sydney Airport and intended Aerotropolis is seen as oversight in the Stage 1 LUIIP.

The attributes of the site individually that present reasons for inclusion in the Northern Gateway include:

- Proximity to the Western Sydney Airport for development, being approximately 1km from the WSA;
- Proximity to the Northern Gateway, with the site adjoining this draft precinct boundary and being able to be incorporated into this precinct;
- Access to both existing and future transport infrastructure including The Northern Road, the upgraded The Northern Road, Elizabeth Drive and the connection to the new M12 Motorway;
- The public transport facilities to be offered for the site from the transport infrastructure including access to the Rapid Bus Service along the new The Northern Road and Elizabeth Drive, access to cycleways, and close proximity to future rail lines and stations (all within walkable distances);
- Satisfaction of the LUIPP key policy drivers of aircraft noise, being outside of all noise contours yet within 1km of the WSA – one of the closest fully noise free sites in the LUIPP;
- Satisfaction of the LUIPP key policy drivers of water catchment planning, with the site being within the same South Creek/Cosgrove Creek catchment as the Northern Gateway and being unimpeded by any flood constraints;
- Previous strategic planning identifying the site as being within the planned Western Sydney Economic Corridor under the Western City District Plan and as employment land within the Western Sydney Employment Area SEPP;
- The site being unsuitable for intensive agricultural purposes and the use of the site for agriculture or agribusiness would be an underutilization of the site's economic potential.

The synergistic effect of most of these attributes combined is undoubted reason that future development of the land to its fullest potential, being a Flexible Employment land use within the Northern Gateway, should be allowed to occur.

This report therefore provides for a basis for the inclusion of the prime site as a viable and critical area for the development of the Northern Gateway and the Western Sydney Aerotropolis.

SITE AND AREA DESCRIPTION:

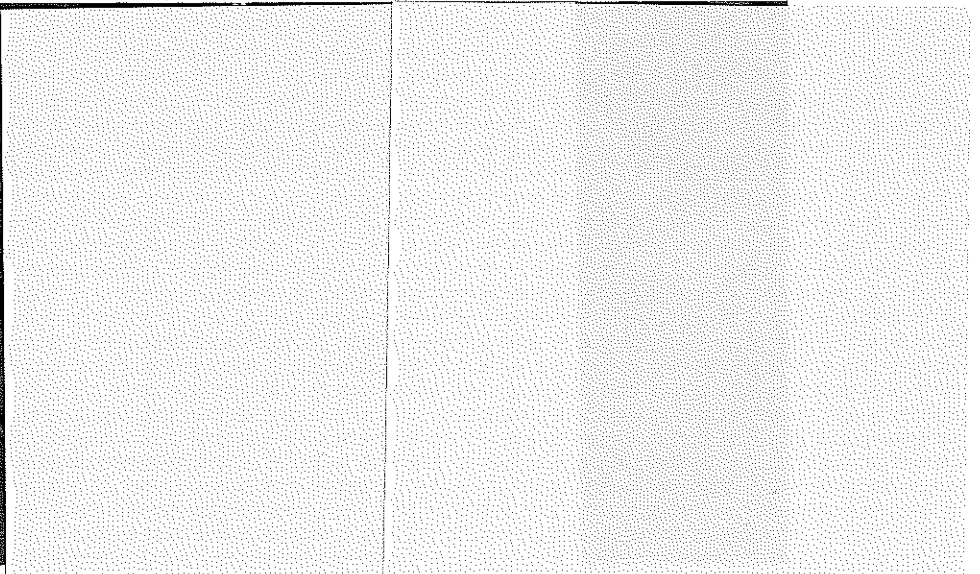
PROPERTY:

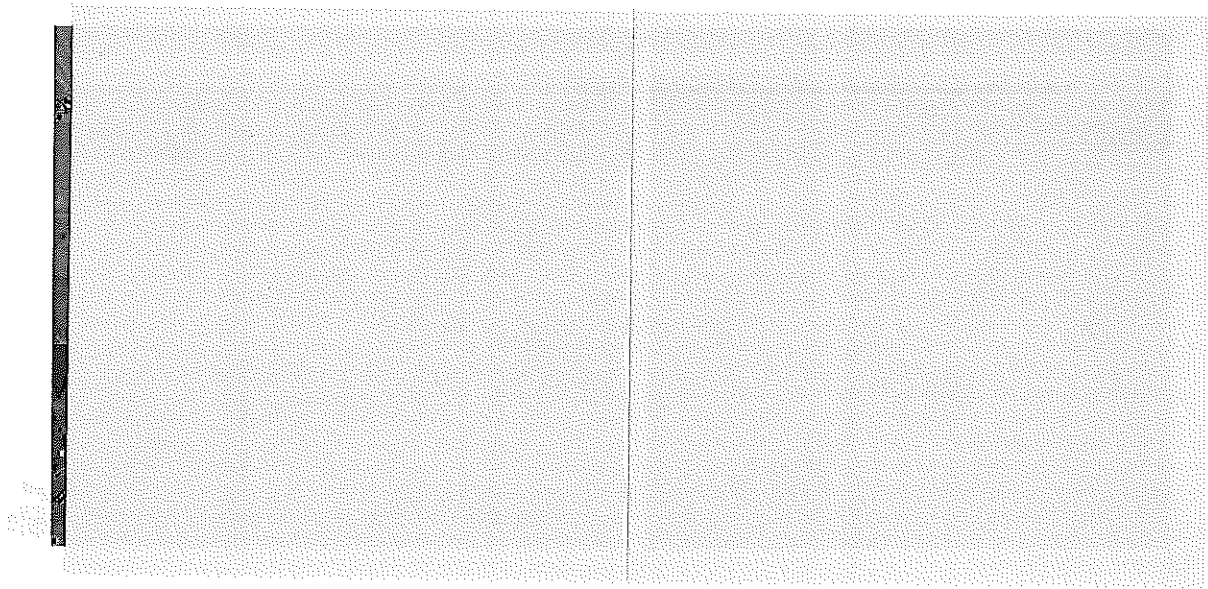
The site has an area of [REDACTED]
[REDACTED]
[REDACTED]

The site is a rural allotment that currently incorporates a two dwelling houses and ancillary farm and storage sheds.

The site is generally a north facing site with a site slope from the rear to the street frontage. No significant vegetation is located on the site, other than some common stands of Casuarina Sp. trees and shrubs. The site includes two farm dams for water storage. An electrical easement encumbers the site, and this traverses the site from north to south.

The site is located at a distance of approximately 1km from the proposed Western Sydney Airport site. An aerial view of the site and locality is provided below:



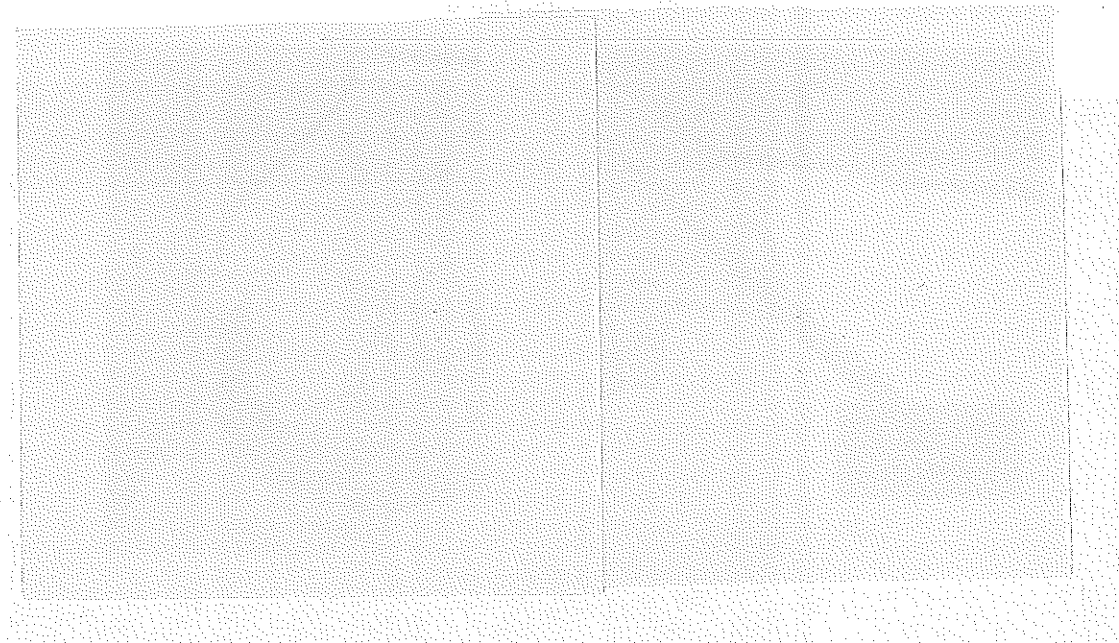


PLANNING CONTEXT:

Local Environmental Plan

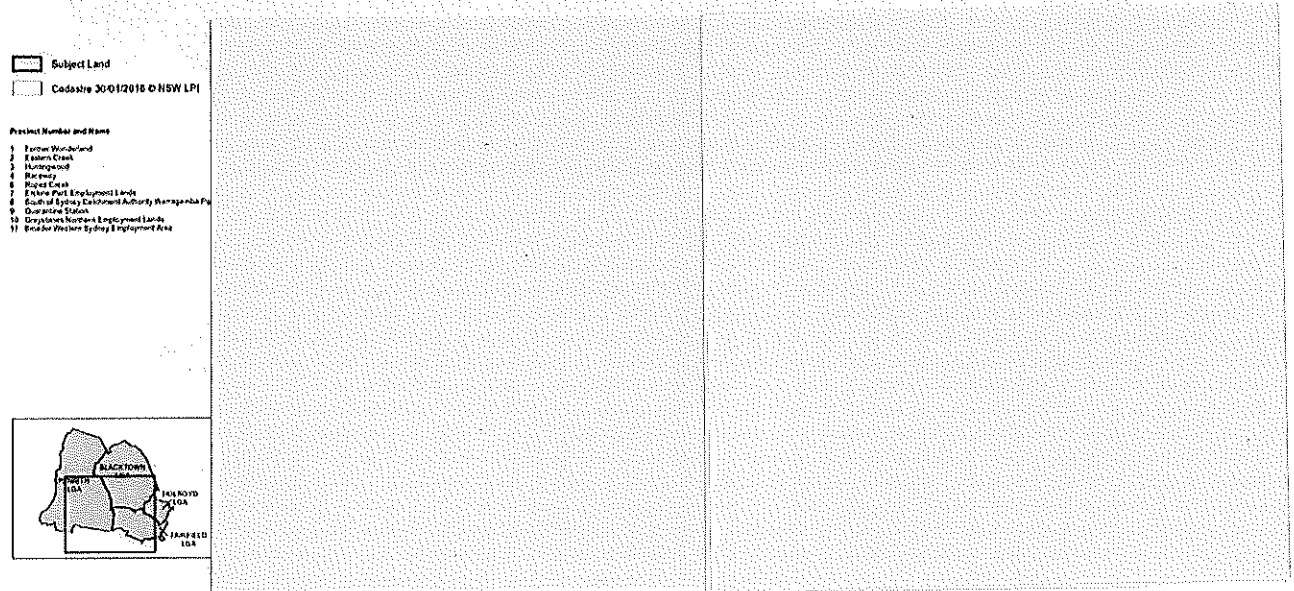
The site is currently zoned as *RU1 – Primary Production* under *Liverpool Local Environmental Plan 2008*.

An extract of *Liverpool Local Environmental Plan 2008* (Map LZN-003) is provided below:



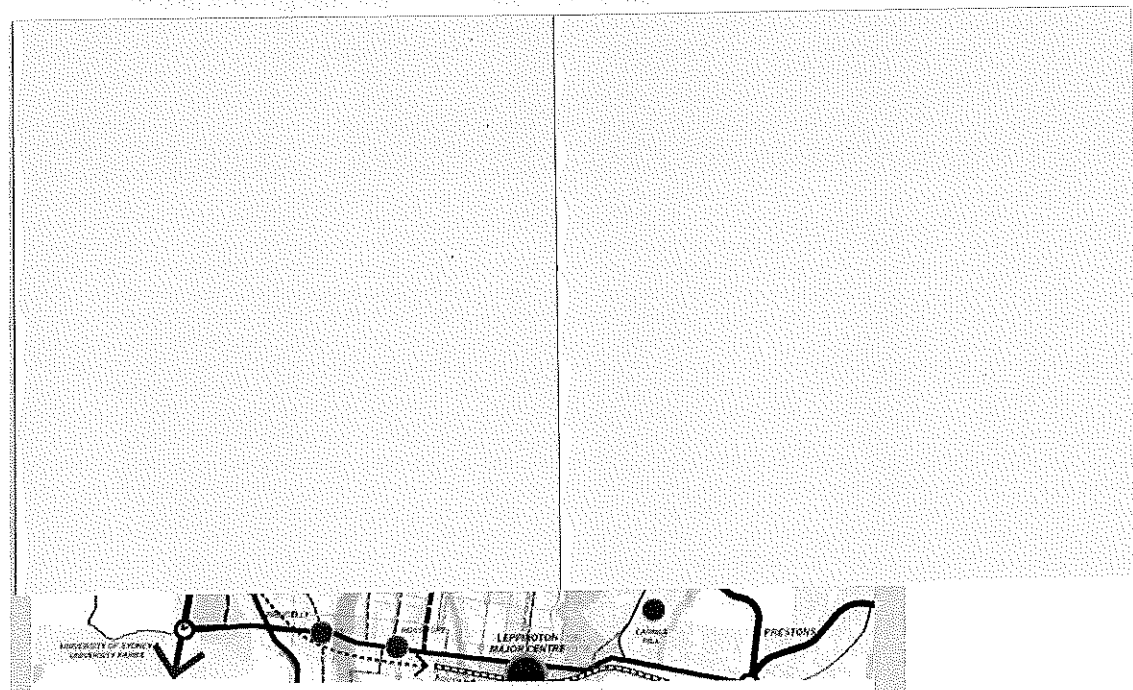
SEPP (Western Sydney Employment Area) 2009

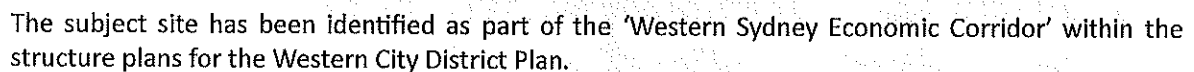
The site is also identified within *State Environmental Planning Policy (Western Sydney Employment Area) 2009*. The site is identified as being within Precinct 11 (the Broader Western Sydney Employment Area). An extract of the Land Application Map for the site under the SEPP is shown below:



Broader Western Sydney Employment Area Structure Plan

The development site is also identified within the Broader WSEA as being employment land, as shown on the map extract below:



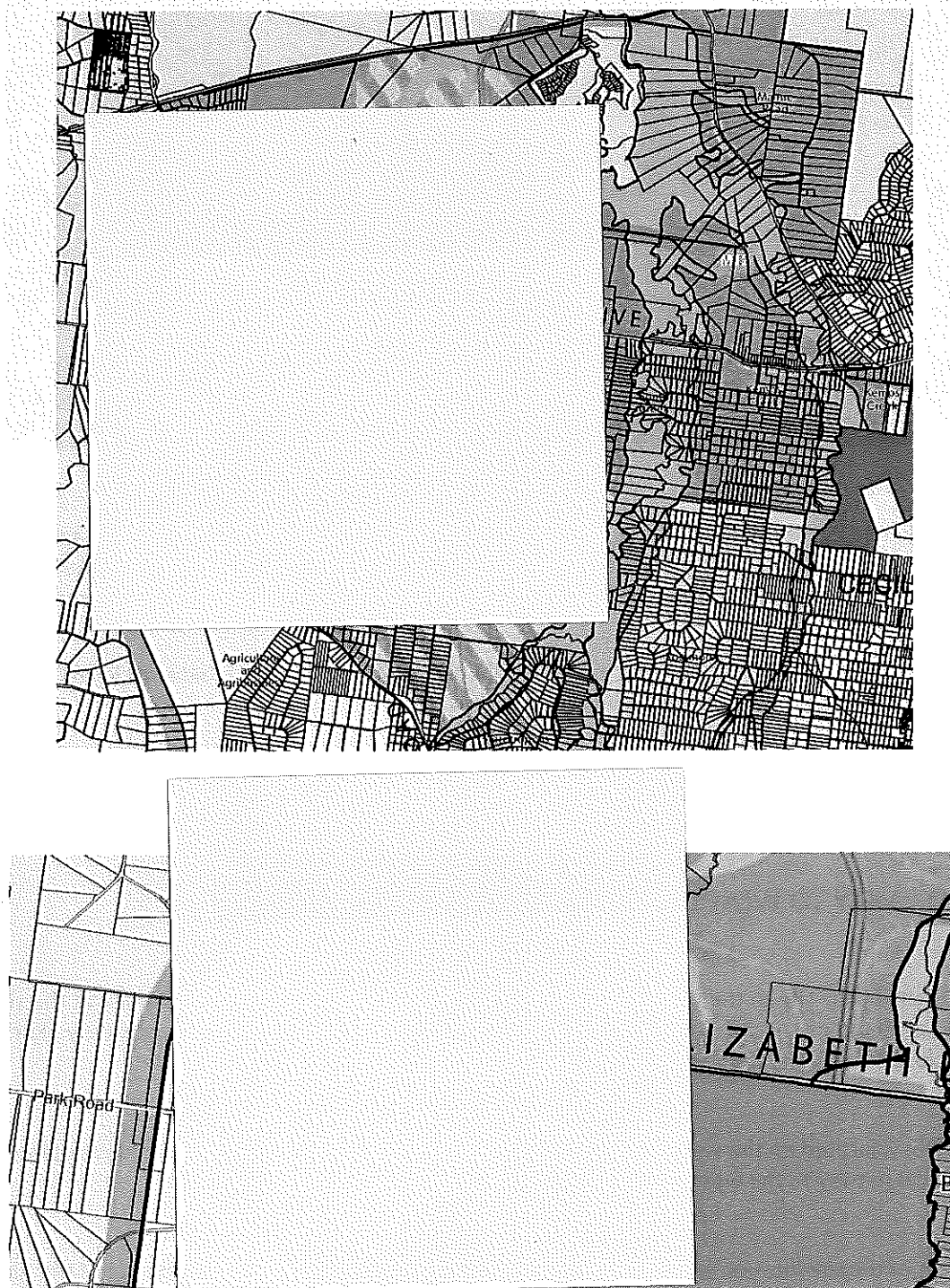


Prior to the draft LUIPP, the above strategic planning documents clearly identified the land for employment purposes.

The inclusion of this site within the Northern Gateway as a Flexible Employment land use would therefore maximise the land use options and provide greater benefits for Western Sydney, in accordance with the previous envisaged outcomes for the land as seen in the above Metropolitan planning documents.

IDENTIFICATION WITHIN THE LUIPP:

The development site is identified as being within the Agriculture and Agribusiness Precinct of the LUIPP Structure Plan. An extract of the subject site within the LUIPP Structure Plan is shown below:



A closer view of the locality within the LUIPP Structure Plan and extrapolation of this to aerials of the site is shown above and below:



As presented in these images, the subject site is directly adjacent to the Northern Gateway and Flexible Employment land use category within this precinct. The site is generally parallel with the remainder of the Northern Gateway's southern boundary along Elizabeth Drive and also the western boundary of the Northern Gateway.

Inclusion of the site would therefore not be out of place with the Northern Gateway locality and would form a holistic and complete part with the Northern Gateway.

PROXIMITY TO WESTERN SYDNEY AIRPORT:

Proximity of the site to the Western Sydney Airport (WSA), namely the close proximity of the site, is a key attribute of the site. The development site is located at a distance of approximately 1km from the closest boundary to the WSA site.

The site is located on the western side of the WSA. Stage 1 of the WSA will involve development of an initial runway to the west of the WSA site.

Details of the site location with respect to WSA site are shown on the following extract of the Airport Plan:

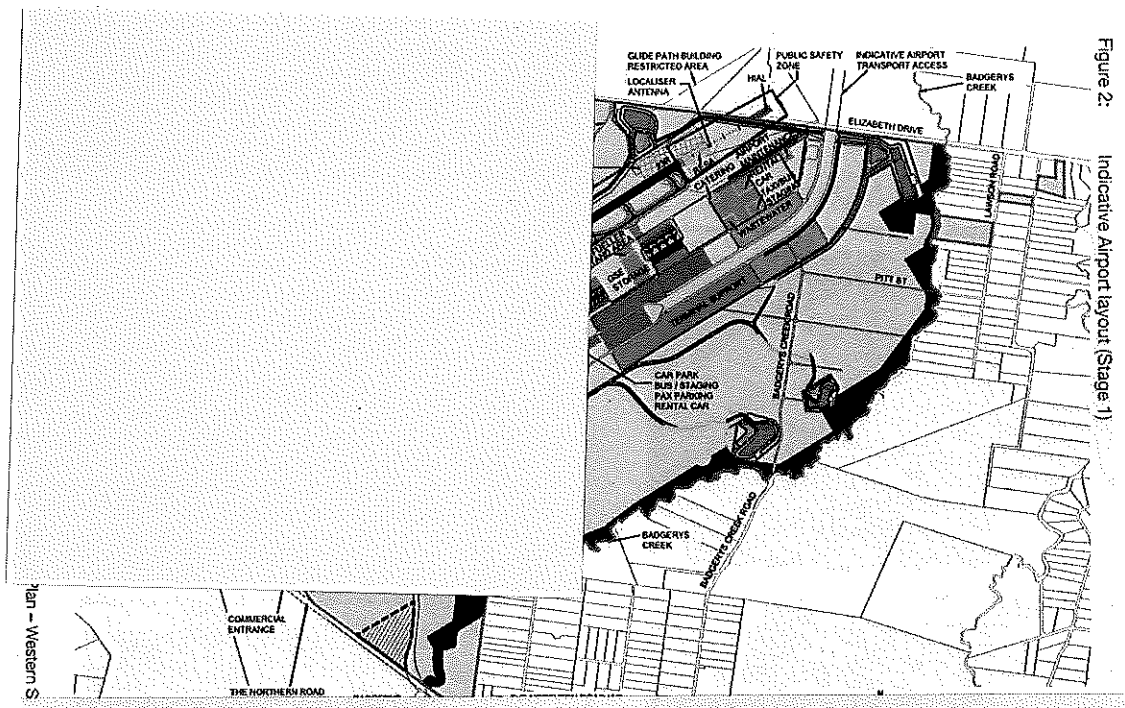


Figure 2: Indicative Airport layout (Stage 1)

The close proximity of the site and the potential that the site has in developing with the WSA is a key attribute for development of the site and for the inclusion of the site into the Northern Gateway.

POLICY DRIVERS FOR INCLUSION IN THE “NORTHERN GATEWAY” AS FLEXIBLE EMPLOYMENT LAND USE:

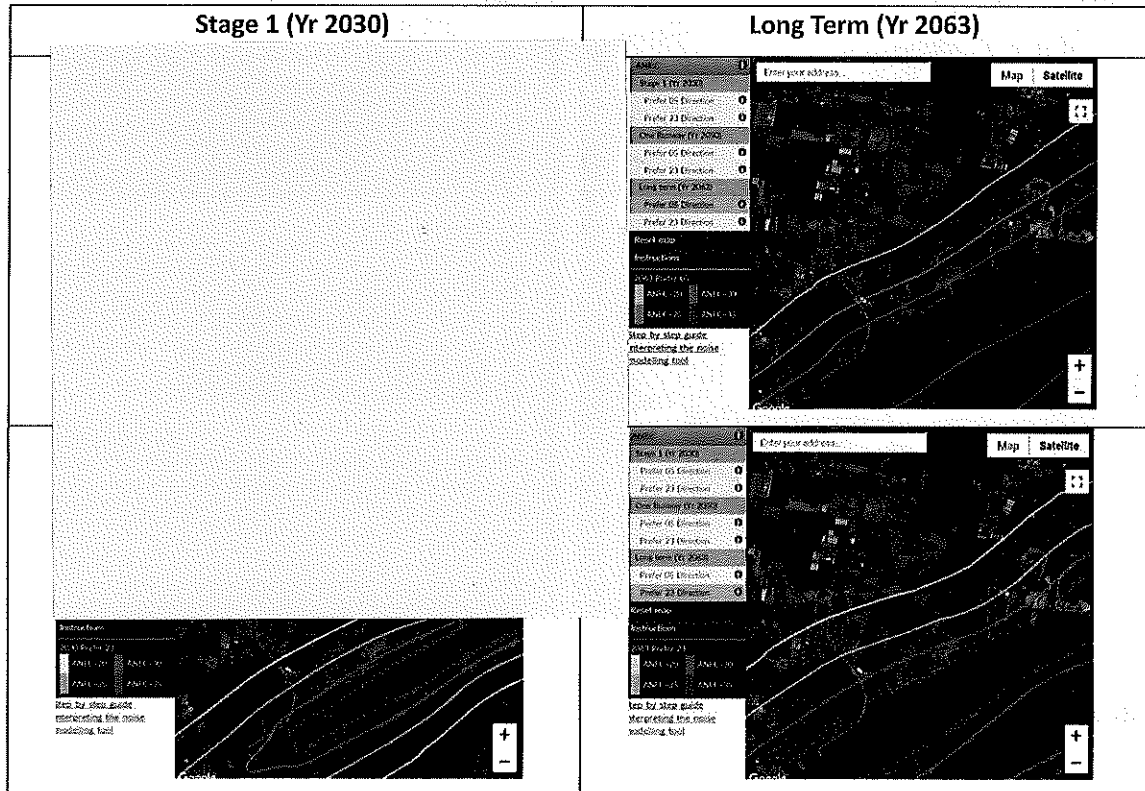
The following attributes of the site are seen as supporting the inclusion of this site into the ‘Northern Gateway’ precinct and for the designation of the site as Flexible Employment:

Airport Operations and Aircraft Noise

The site satisfies the policy driver for the airport operations. The Western Sydney Airport (WSA) will be a 24 hour seven days a week facility and inclusion of the site to support this operational activity is considered to be important.

The following notes describe how the subject site relates to the WSA operations and respectively, the site attributes that satisfy these considerations:

- The site benefits from the ANEC/ANEF contours which is considered to be a key restraint in land use planning for the Aerotropolis. The ANEC and ANEF contours affecting the site is provided for below:



- As shown above, the site is **outside** of the 20 ANEC/ANEF contour and will **not be affected** by aircraft noise.
- The WSA will commence with the building of the Stage 1 runway. The site represents the one of the closest distance of **any LUIIP parcels of land** or current Northern Gateway land to Stage 1 of the WSA that is **fully outside** of any ANEF/ANEC affectation.
- The site is located at a distance of about 1200m from the WSA Stage 1 runway, and is not affected any by airport noise. The Aerotropolis Core, in comparison, will be between 3.5-4kms from the first runway of the WSA.

Uses permitted within this area so close to the WSA could not only be employment land uses, but residential, business/office use, hotels/entertainment, schools, government, hospitals and health, etc... as all these uses rely on no or minimal aircraft noise.

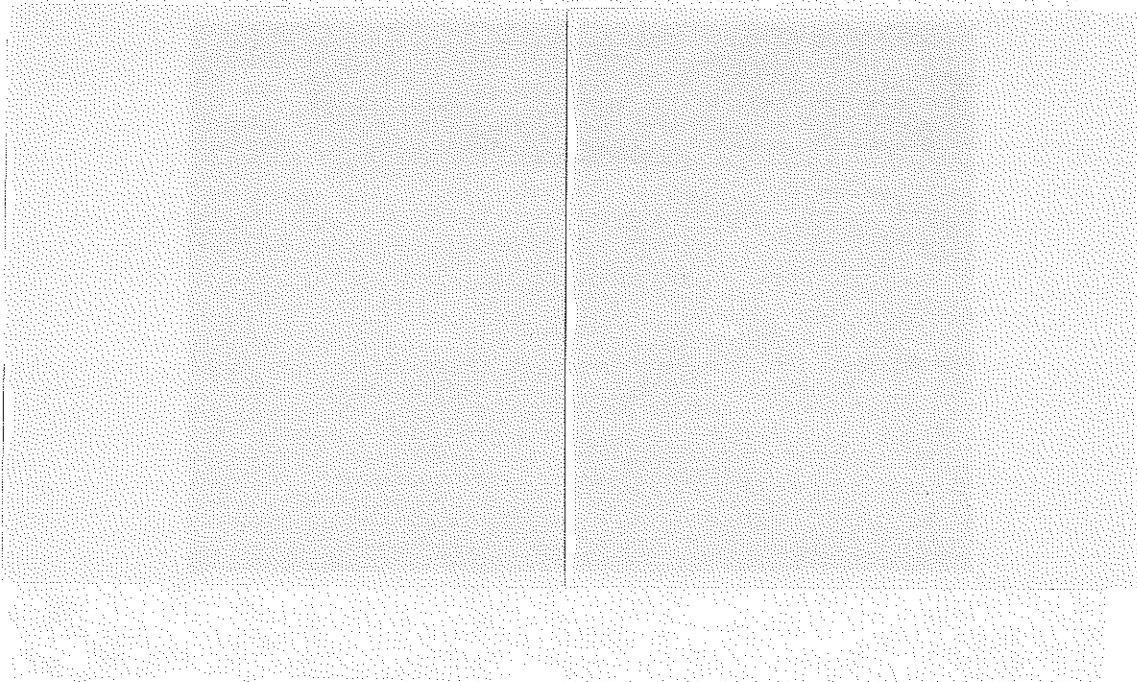
Development in areas outside of the ANEC/ANEF contour within this close proximity distance to the WSA should for simple economic and environmental planning issues, be permitted and allowed to be developed as an initial stage of the Aerotropolis.

The development of such superlative land for inclusion in an Agricultural / Agribusiness Precinct is not considered to be the best economic use of the site.

Aviation Safety and NASF

Any future development of the subject site would satisfy the key policy driver for aviation safety:

- Existing land contours within the site range from slightly less than 70m AHD at the Elizabeth Drive boundary to approximately 90m AHD at the rear highest point of the site. Over 80% of the site is however below the 80m AHD contour (refer to extract below).
- The Obstacle Limitation Surface (OLS) for the site is RL125.5m AHD, similar to the Aerotropolis Core, therefore not hindering development.
- Development of the site for intensive agricultural uses is generally not permitted by NASF Principles and Guidelines. Development of the site for Flexible Employment uses would however not impact on the National Airports Safeguarding Framework Principles and Guidelines.
- Windshear for development is not an issue in the site and surrounding area is parallel to the WSA runway and not located at landing/take-off ends of the runway and approaches.
- The site is also outside of all public safety zones of the WSA (which is the ends of the runways). Any land uses would therefore not affect these public safety zones.



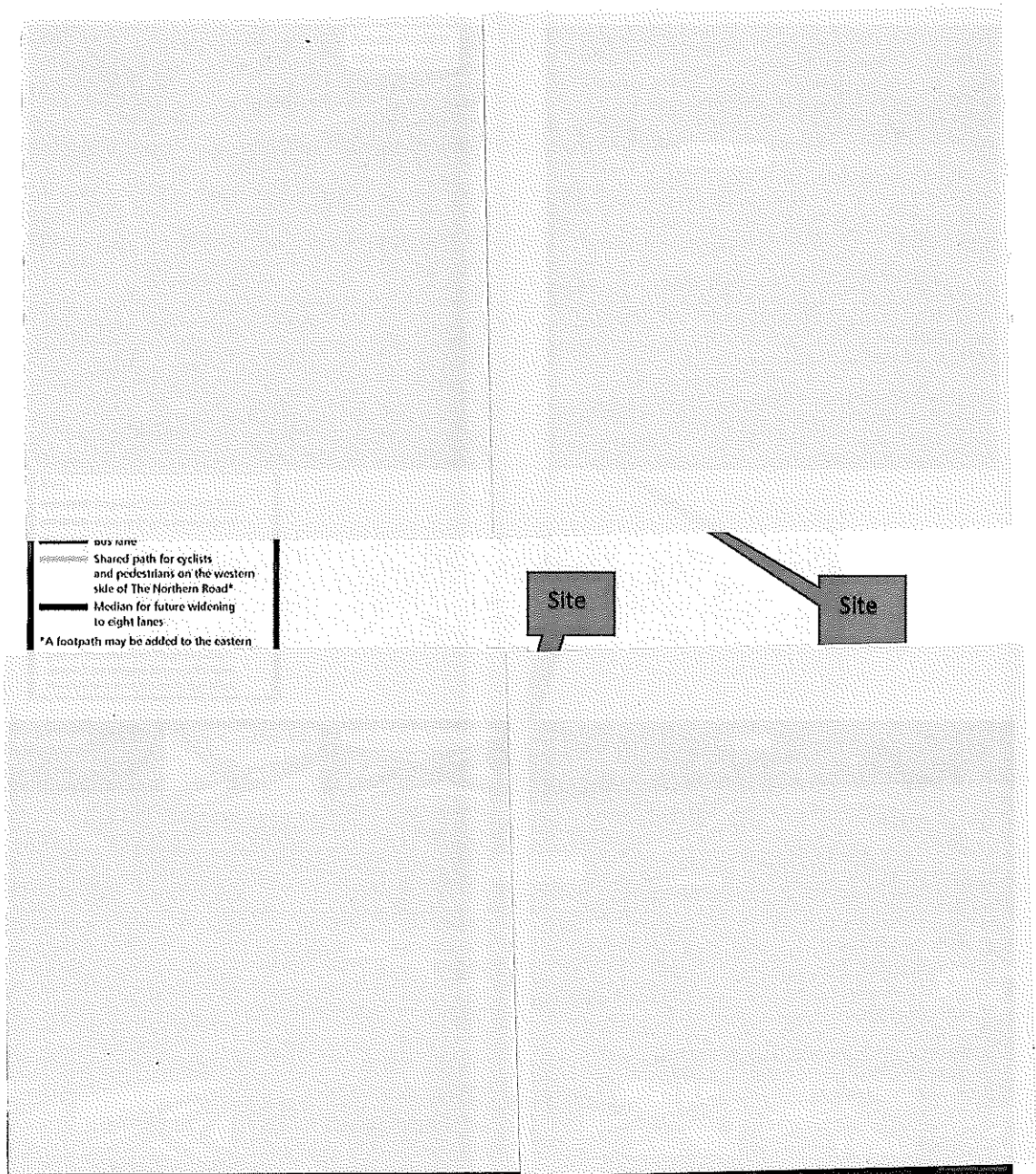
Road Infrastructure and Connections

The development of the site satisfies the policy driver for infrastructure to connect the Aerotropolis and benefits from excellent road infrastructure, proximity and connections:

- The site is serviced by Elizabeth Drive and is near to the existing The Northern Road (A9) and the proposed The Northern Road deviation. Elizabeth Drive is the key east-west link for the

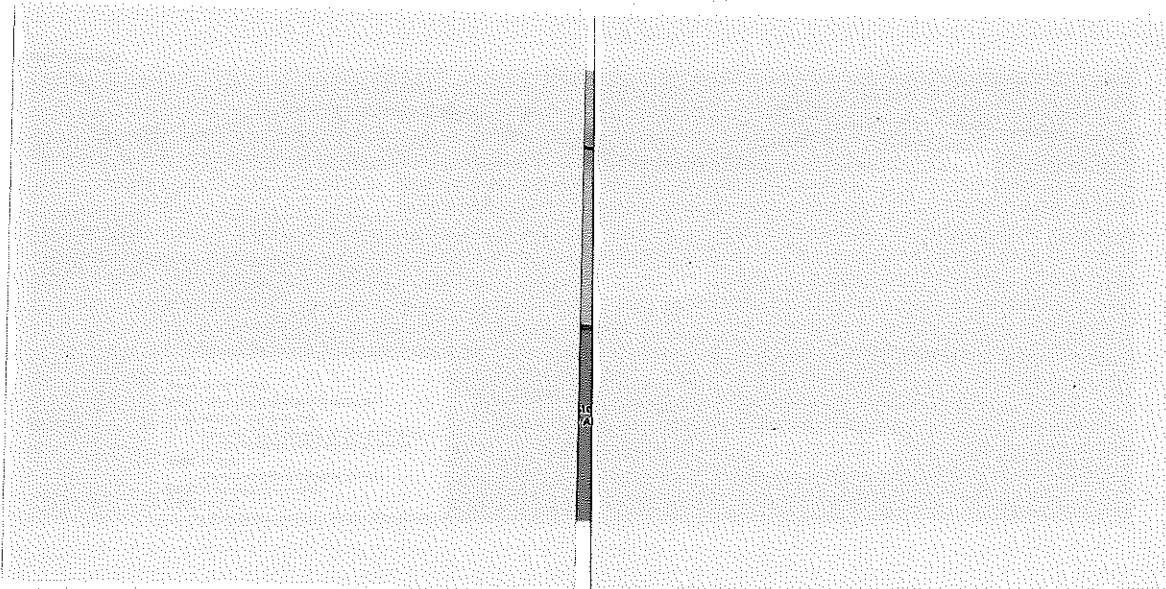
Aerotropolis while The Northern Road is the primary north-south connection. Both roads are classified roads.

- These classified roads are approved for all NSW Combined Height Mass Limits (HML) and Restricted Access Vehicle (RAV) use. The roads therefore do not limit heavy vehicle usage (as currently is the case with Luddenham Road servicing the remainder of the Northern Gateway).
- The site will also benefit from the upgrade of The Northern Road which will provide for a dual carriageway, dedicated bus lane and cycleway/pedestrian way (refer to diagrams below from RMS):



- The new access arrangement from The Northern Road at Adams Road will improve this access, as it will be another signaled level intersection providing direct access to the WSA.
- Access to the M4 and M7 is direct from these two classified roads.

- The site will also be located within [REDACTED] of the planned M12 motorway and between the intended WSA access road and The Northern Road interchanges. When built, direct connections from the site to the M12 via Elizabeth Drive and The Northern Road to the rest of Sydney will be available (refer to diagram below from RMS):



- Road connectivity and infrastructure (as being built) is therefore considered to be better than the Aerotropolis Core and the rest of the Northern Gateway.
- The site is also located close to the planned M9 motorway (when constructed in future years after the completion of WSA).

The site therefore provides for equal if not better road connectivity than other sites within the Northern Gateway or any other precincts in the LUIP.

Public Transport Connections

The site satisfies the policy driver for public transport to connect the Aerotropolis to the rest of Sydney. The site is located in a very accessible area that will benefit from public transport connections:

- The suitable location of the site provides for potentially a walkable and accessible community that will allow for easy connections to public transport in the Aerotropolis possible.
- The subject site is within **walking distance** of the WSA and its close proximity to the Stage 1 area of the WSA makes it unique among other areas of the Aerotropolis. The site will clearly allow for local communities who want to live in walkable, cyclable and accessible places close to the WSA.
- Bus connections servicing the Aerotropolis will be provided early on and before rail connections are constructed. The site benefits from its location with the proposed Rapid Bus Service to be located along The Northern Road as part of The Northern Road upgrade, with dedicated **bus lanes** to be constructed on this road. The Northern Road will also have a dedicated **cycleway** and pedestrian way.

- Elizabeth Drive will also provide for a future 'city servicing' public transport, and the site benefits from its location along Elizabeth Drive.
- The site will also be accessible to the North-South Rail Link that will serve the northern half of the Aerotropolis. The site will be accessible to this rail network by the public transport bus network and potentially also by walkways and cycleways.
- Distances from the future railway stations will be comparable if not better to distances of many current Sydney suburbs served by rail.

Freight Requirements

The site is well connected to regional and local freight networks and will benefit for the transport and infrastructure initiatives proposed (as described above). Some of the measures that the site will assist in supporting this policy driver for any future development are:

- Future access to the freight network will be available via the main current classified roads, the upgraded The Northern Road and the future M12/M9 connection to the freight line.
- The development site is also located near to the Freight/Logistics area of the WSA and benefits from this location for supporting the freight and logistics to WSA via its excellent transport and road system.

New Generation Communication

The future development of the site would satisfy the policy driver for developing new generation communication as part of the development of the Aerotropolis:

- The site can easily accommodate digital infrastructure and 5G technology can easily be implemented within the site and the surrounding area.
- Currently the site is serviced by neighbouring telecommunications towers that offer full 4G connectivity on multiple networks. Upgrading of these facilities to 5G could easily be achieved.
- Digital connectivity and smart technology can therefore be incorporated into the site and into the surrounding area.

Water Smart Planning and the South Creek Catchment

The future development of the site satisfies the policy driver for not impacting on the South Creek catchment and is in the same Cosgrove Creek catchment that flows through the Northern Gateway. Some of the features of the site are:

- The site is contained wholly within the catchment of Cosgrove Creek which flows into the South Creek Catchment area, similar to the Northern Gateway and the Aerotropolis Core. The land use planning of the site should therefore reflect this water catchment.
- The site incorporates minimal / nil riparian lands with only a minor sub branch stream of Cosgrove Creek being present on the front western corner of the site.

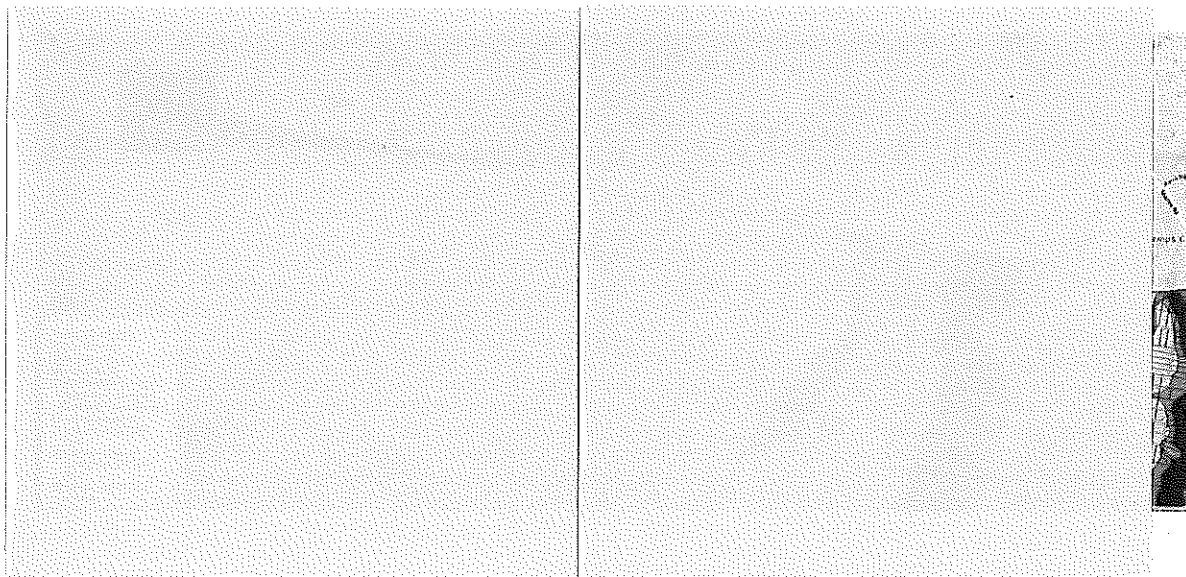
Other areas, for example, of the Agriculture/Agribusiness precinct west of the site are not within the South Creek Catchment but within the Nepean River Catchment (area west of the current The Northern Road). The South Creek Catchment therefore forms a natural boundary of this area.

Water smart planning of future development of the site would therefore not impact on the local South Creek catchment and WSUD principles can be accommodated on the site.

Flood Planning Levels

The subject site satisfies a key policy driver for development in the LUIPP by being located in areas of suitable flood planning:

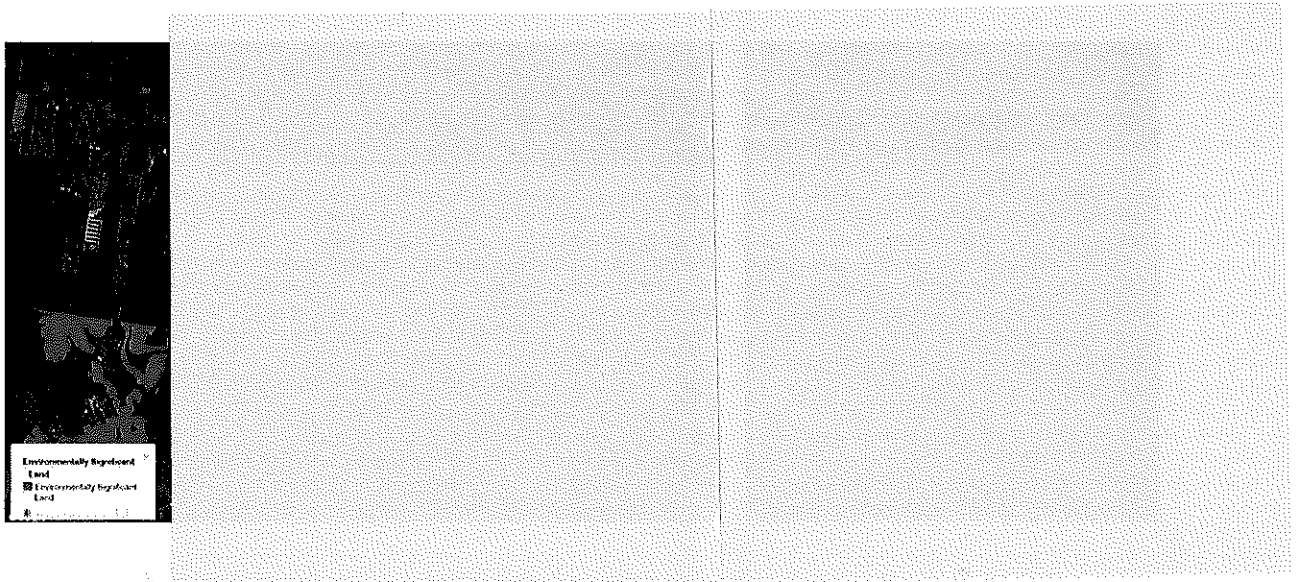
- The map of the South Creek Catchment shows that the site is outside of the PMF.
- As well as being outside of the PMF, the site is **outside of the 1% AEP**. This is shown on the details below as provided by Liverpool City Council.
- Flood planning is therefore not a restriction to development of the site as it is within the upper catchment areas of South Creek. Any future development of the site should occur in conjunction with lower catchment flood prone areas.



Environmental Conservation

The development of the site and the attributes of the site are suitable for environmental conservation in the Cumberland Plain. Some of the features of the site are:

- The site has no Cumberland Plain Woodland or other endangered communities.
- The biodiversity impacts of future development on the site are minimal as most of the landscape is disturbed/previously cleared land.
- The site holds little biodiversity and contains no significant threatened communities.
- The environmental conservation values and attributes of the site are shown below. The site is outside of all Environmentally Significant Land as mapped by Liverpool City Council:



Other policy drivers

The future development of the site would allow for the satisfaction of the policy driver for creating liveable and contemporary neighbourhoods:

- The development of the site would allow for the expansion of the tree canopy.
- Aboriginal culture will not be affected and will be promoted. The area, having been previously farmed and cleared, holds no aboriginal archaeological heritage.

The site could also allow for promoting culture, the arts and creativity:

- The positive attributes of the site (such as no noise affectation) could promote culture and creativity, and could also be used to promote tourism.
- The site location, being not far from the Luddenham Village, would promote and expand the culture of the area and history/creativity of the Luddenham area (eg Luddenham Agricultural Show / churches and historic buildings / sporting facilities).

- The site benefits from the surrounding multi-cultural history of its inhabitants and facilities (for example, the Workers Hubertus Club for German / European heritage and sporting endeavours).

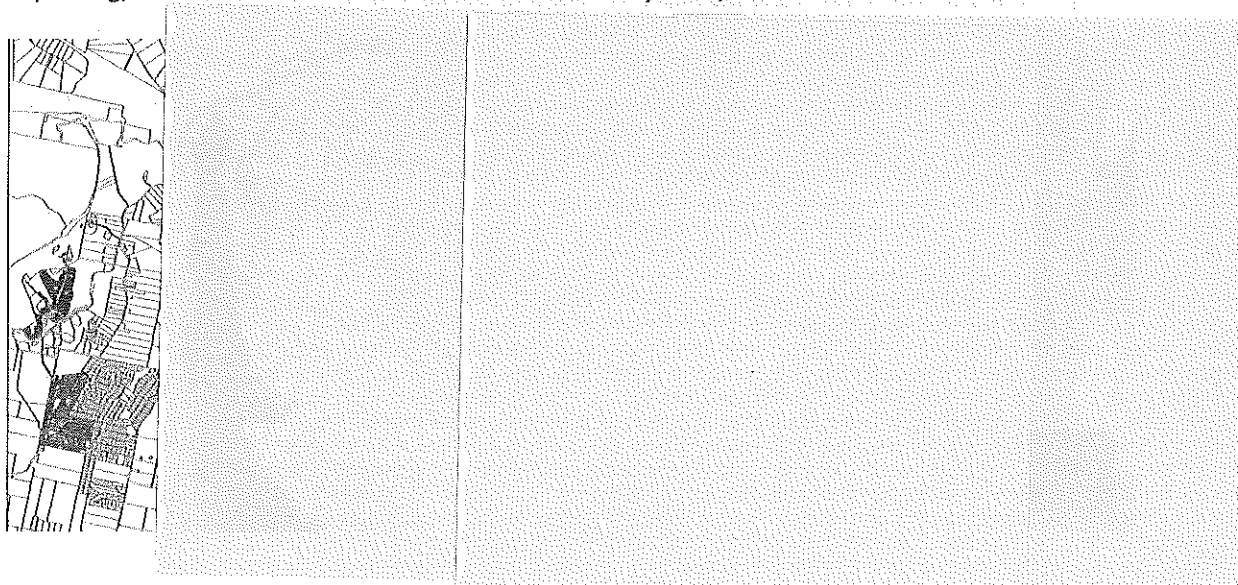
Any development of the site will also be able to accommodate new energy infrastructure:

AGRICULTURAL USE OF THE LAND:

The occupiers of the site have a history in using the land for past agricultural pursuits, being market gardening. The subject site now has, however, limited agricultural potential for traditional or improved agriculture.

Some of the reasons that traditional agricultural activities are unsuitable for the site include:

- Poor and used soils. The majority of the site is identified as being mapped as having "very severe limitations" under land and soil capability mapping (Office of Environment and Heritage mapping). Land with "very severe limitations" is generally land incapable of sustaining many land use practices (eg cultivation).
- The site is excluded from land mapped as Biophysical Strategic Agricultural Land under *SEPP (Mining, Petroleum Production & Extractive Industries) 2007*, as shown below:



- Intensive agricultural activities may impact on the operation of the WSA and are not recommended by the NASF Guidelines for sites in such close proximity to airports.
- The economics of traditional agriculture, like other sites within the area, are not viable anymore on these types of land. If these were viable, then these would now be occurring. Large scale operations, such as new poultry farming, are not possible due to the size of lots and neighbouring restrictions.

From an economic point of view, a Flexible Employment use of the land would generate major employment opportunities. The economic benefits of a Flexible Employment land use would be well above that of an Agriculture & Agribusiness use of the land.

CONCLUSION AND RECOMMENDATIONS:

A Flexible Employment use of the land offers a better use of the site in its relationship to the Western Sydney Airport and the Aerotropolis. The site adjoins the Flexible Employment land use category within the Northern Gateway and its inclusion into the Northern Gateway is recommended based on the attributes of the site and other factors outlined in this report.

In summary, it is the opinion that the site should be **integrated into the Northern Gateway and Flexible Employment area** for the following reasons:

- The proximity and location of the site in relation to the Western Sydney Airport for development, being located approximately [REDACTED] from the WSA;
- The proximity of the site to the Northern Gateway, with the site directly adjoining this draft precinct southern boundary area. The proximity of the site can therefore enable it to be well integrated into the Northern Gateway;
- Access is excellent to both existing and future transport infrastructure including The Northern Road, the upgraded The Northern Road, Elizabeth Drive and the connection of this to new M12 Motorway. This transport infrastructure, as already being delivered, will be available for early development and use of the site;
- The public transport facilities to be offered for the site from the transport infrastructure including access to the Rapid Bus Service along the new The Northern Road and Elizabeth Drive, and close proximity to future rail lines and stations. The site will also benefit from new cycleways along The Northern Road and its proximity to the WSA, and these close public transport areas allow for easy access (including pedestrian/walkability to these areas);
- Satisfaction of the LUIPP key policy drivers of aircraft noise, being outside of all noise contours yet within 1km of the WSA. The site is one of the closest noise free sites in the LUIPP. The site development would also be in accordance with NASF Guidelines and Practices;
- Satisfaction of the LUIPP key policy drivers of water catchment planning, with the site being within the same South Creek / Cosgrove Creek catchment as the Northern Gateway, and being fully unimpeded by any flood constraints;
- Previous metropolitan strategic planning identifying the site as being within the planned Western Sydney Economic Corridor under the Western City District Plan and as employment land within the Western Sydney Employment Area SEPP. The previous identification of the site for employment purposes cannot be ignored, and the exclusion of the site from the potential employment purposes is seen as a shortcoming of the LUIPP;
- The site being unsuitable for intensive agricultural purposes. The use of the site for agriculture and being within the agriculture and agribusiness precinct would be an underutilisation of the site's economic potential and its prime location within the LUIPP.

This submission has been prepared by Anthony Krilich (MAIBS, B.App.Sc. (Env. Hlth)).

[REDACTED]
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Anthony Krilich

Report No. J06-043/A