

**WESTERN SYDNEY PLANNING PARTNERSHIP  
PO BOX 257  
PARRAMATTA NSW 2124**

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**5 MARCH 2020**

**SUBMISSION TO DRAFT WESTERN AEROTROPOLIS PLAN  
ON BEHALF OF THE OWNER AT  
[REDACTED], BRINGELLY NSW 2556  
[REDACTED]**

I have been engaged by [REDACTED] (property owner of [REDACTED], Bringelly) to prepare a submission to the Draft Western Sydney Aerotropolis Plan.

Upon a review of the exhibition documents and having discussed the matter with the client, the following issues have been identified for consideration and action by the Western Sydney Planning Partnership.

**PROPOSED TRANSPORT CORRIDOR**

My client's property appears to be located north from the 'proposed transport corridor' based on the 'Structure Plan – Aerotropolis Core' – see figure 1 below.

The location of the corridor appears to be an error and its location should be adjacent to my client's land holding where the corridor is to create a secondary road frontage to my client's landholding which is the entrance of the defence land ([REDACTED]) – see figure 1 and 1a showing the recommended relocation of the transport corridor.

This would be a fairer and equitable outcome given the significant development and investment opportunities the defence site offers, which can be financially and viably absorbed by the future developer as a road dedication.

Furthermore, this would also allow the State Government the option of not having to acquire to the south, and instead, have the future developer construct and dedicate the subject corridor.

This would allow savings to be utilised elsewhere on other critical infrastructure projects to physically-activate the precinct.

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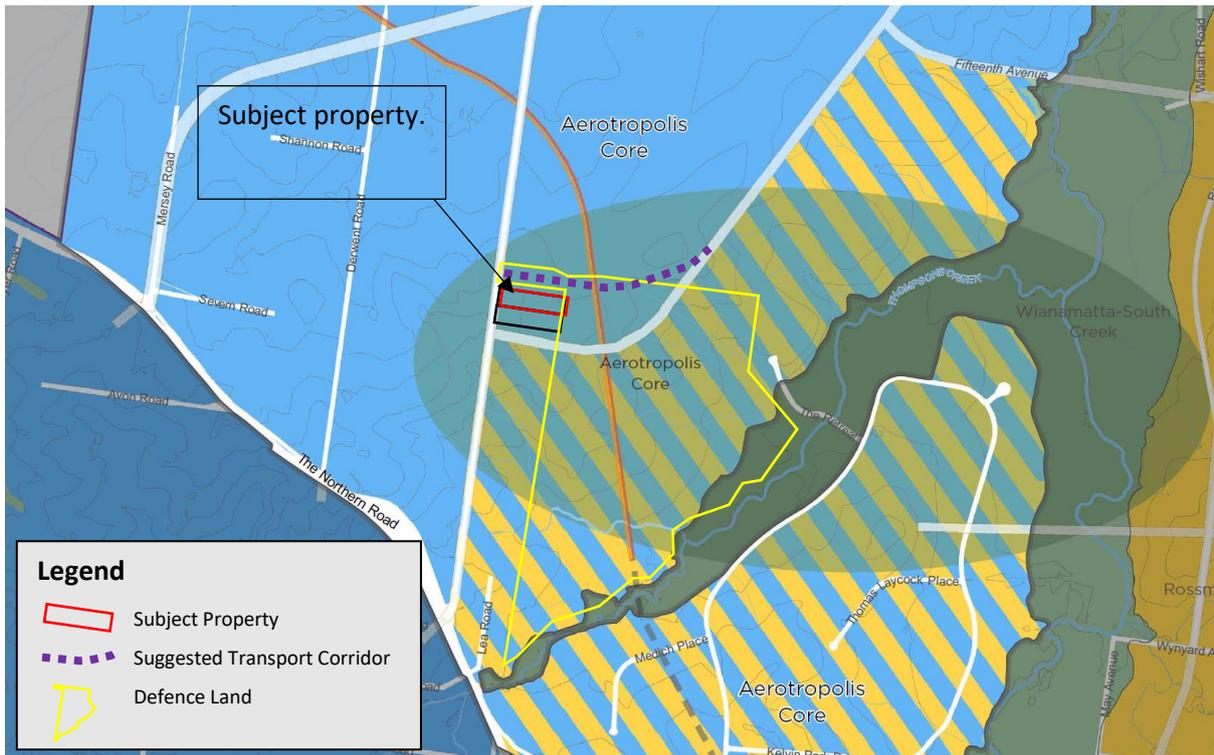


Figure 1: Subject property outlined in red in context of the draft Structure Plan – Aerotropolis Core

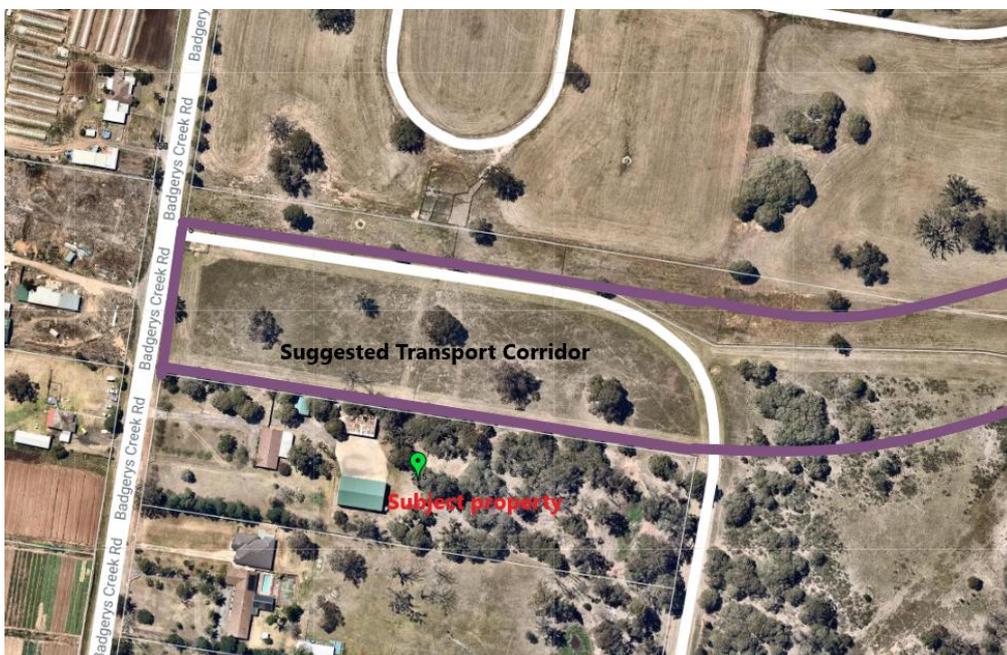


Figure 1a: Subject property and suggested relocated transport corridor over existing entrance to defence land.

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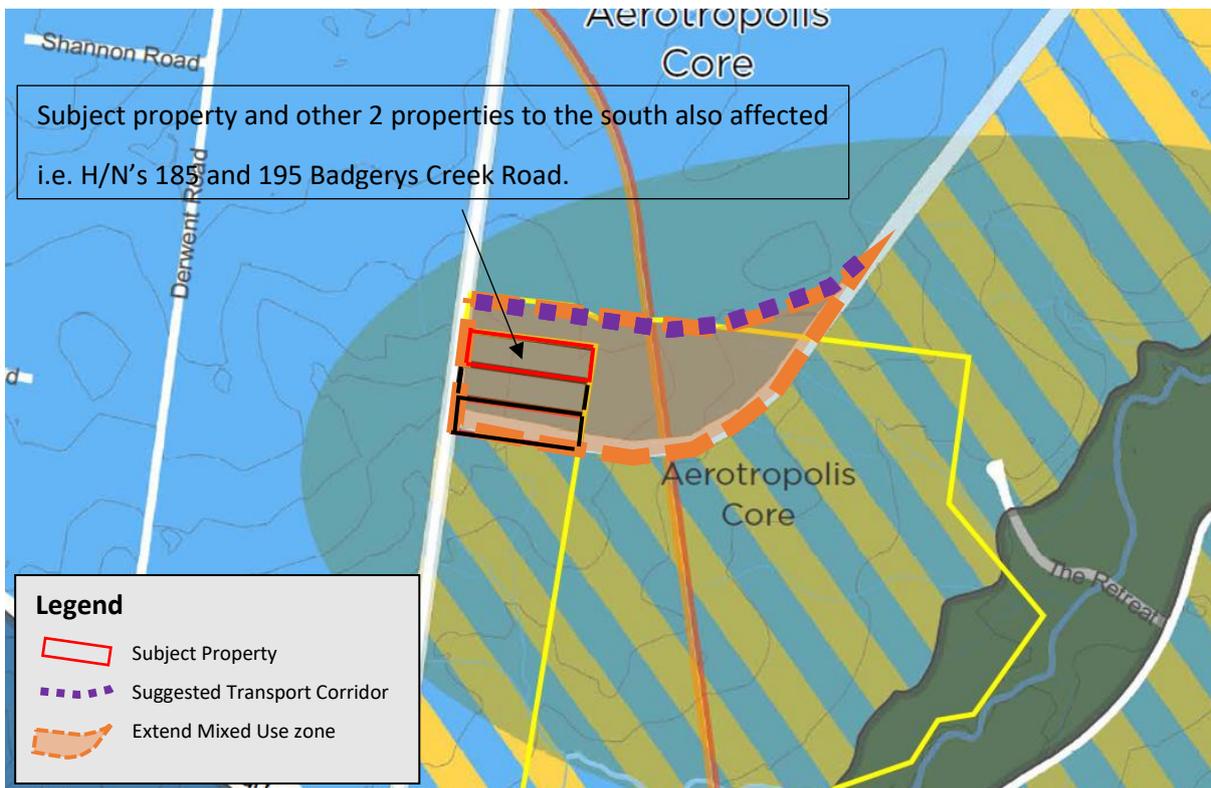
REQUEST TO CHANGE PROPOSED ZONING FROM ENTERPRISE TO MIXED USE

To reduce land-use conflict and to delineate the Enterprise and Mixed-Use zones, it is considered appropriate to also realign the two zones to match with the aforementioned road realignment. This would mean the entire defence land (██████████) and ██████████ (H/N's ██████████ Bringelly) would be zoned Mixed Use instead of Enterprise – see figure 2 below for reference.

These properties are not affected by flooding or the draft Australian Noise Exposure Concept mapping, which means there are opportunities for the site to be used for high density residential and employment purposes (i.e. mixed uses).

Furthermore, the client has discussed the future development of the area with the neighbours, and they are all prepared to sell together, which would greatly attract major investors for a potential major project opportunity.

Otherwise, these properties would be underutilised and not considered to be the most efficient use of the land by the proposed Enterprise zoning.



**Figure 2 – Suggested extension of the Mixed Use zone (shaded in orange) to align with suggested transport corridor (purple dash)**

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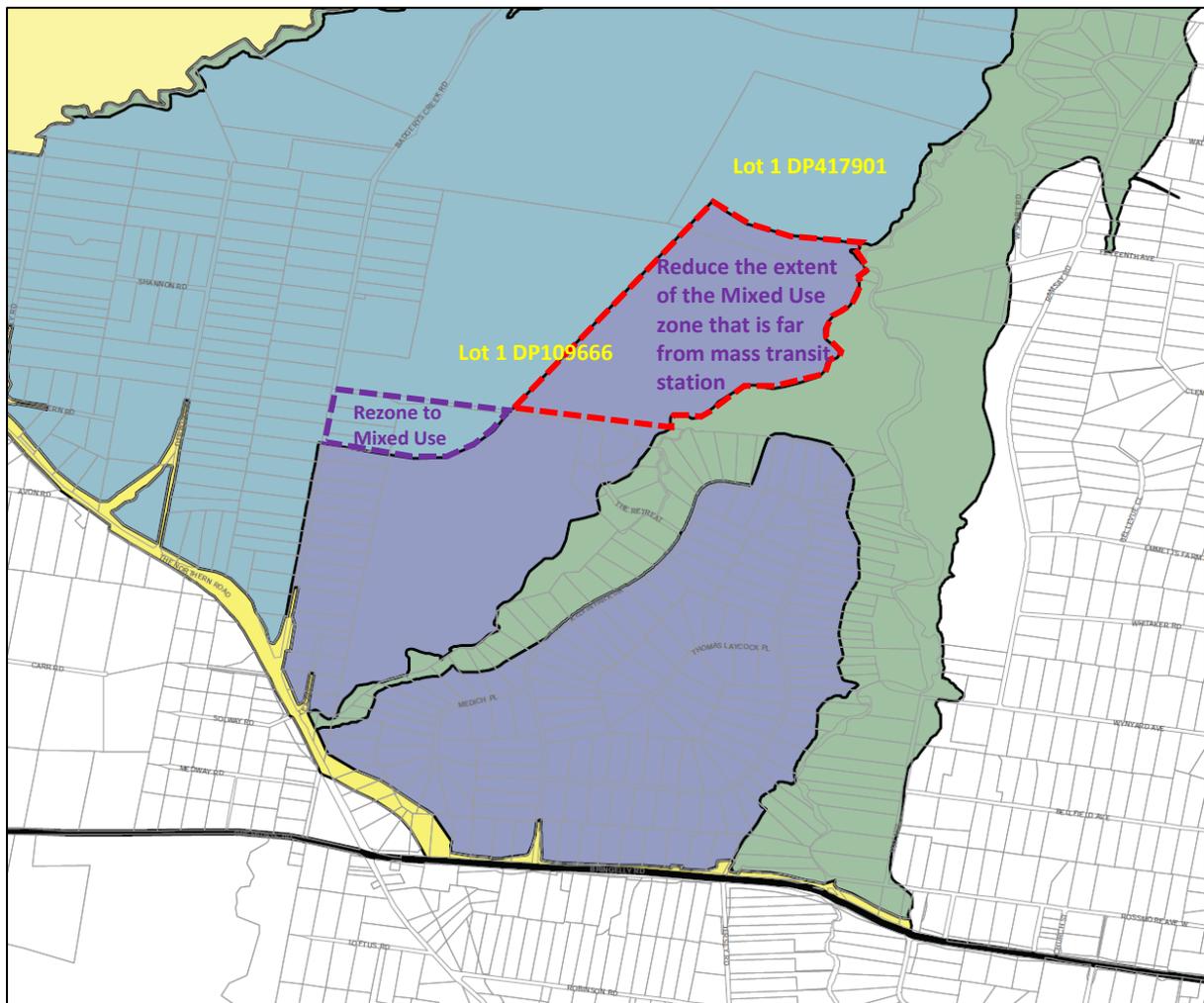
**OBJECTION TO THE EXTENT OF MIXED-USE ZONE ON [REDACTED]**

The proposed Mixed-Use zoning that extends further north on [REDACTED] are inconsistent with the objectives and principles of having an *accessible and well connected Aerotropolis* and a *sustainable, low carbon Aerotropolis*.

The extended distance of this area from a future mass transit public transport service is too excessive to be considered well-connected, which will result in a higher dependence of private vehicles and subsequent higher emissions and congestion.

The Mixed-Use zoning on [REDACTED] should be reconsidered and redistributed so that it is closer to a future mass transit public transport services (i.e. train/metro station) than it is currently proposed over this property.

This includes the rezoning of [REDACTED], and [REDACTED] to Mixed Use instead of the proposed Enterprise zone, being closer to a future mass transit public transport services – see figure 3 below.



**Figure 3 – Suggested rezoning that considers the location of mass transit station/s.**

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As a result of the current Structure Plan, my client's land is one of three 2-hectare sites which will result isolation [REDACTED] Badgerys Creek Road) which presents future redevelopment obstacles where the building footprints and developable area would be detrimentally affected.

These three sites are surrounded by the proposed north-south road and the Government owner land. However, if the new north-south road is shifted further to the north by approximately 200 metres, it would therefore adjust the boundaries of the zones and prevent these three sites from being isolated.

Further there is also a logical and distinct advantage to Authority to move the north-south road onto Commonwealth Land. Currently, the proposed north-south road is on 185 Badgerys Creek Road, which would cost upwards of \$15million to compulsorily acquire. Moving the proposed north-south road to Commonwealth Land would save the Authority \$15 million.

#### SIGNIFICANT ZONING CHANGES FROM STAGE 1 LAND USE AND INFRASTRUCTURE IMPLEMENTATION PLAN

The Draft Western Sydney Aerotropolis Plan significantly varies from the Stage 1 Land Use and Infrastructure Implementation Plan.

There were no public concerns to the proposed mixed use to all the areas identified in the Stage 1 Plan.

The proposed changes are significant and too inconsistent with the Land Use and Infrastructure Implementation Plan.

In this regard, it is requested the rezoning reflect the initial Stage 1 plan as previously exhibited.

#### NEW CORE STATION

The subject site on Badgerys Creek Road is likely to be located within walking distance of a new Core Station as part of the Sydney Metro Greater West.

Although the exact location of the station has not been confirmed, early indications as shown in the North South Rail Line and South West Rail Link Extension Corridors Draft Strategic Environmental Assessment, Transport for NSW (31 January 2018), indicate that a station will be located in close proximity to the subject site.

The subject site will be situated within walking distance of a train station is more suitable for residential use, as set out in the Draft Western Sydney Aerotropolis Structure Plan.

The site is also well suited to be used for Mixed Use including Residential Development and other sensitive uses as it is not affected by the Australian Noise Exposure Contour (ANEC).

The site is located outside of the Australian Noise Exposure Concept (ANEC) 20 and is therefore generally regarded as being acceptable for new residential development. Further, any development would not be subject to specified design and construction standards to reduce noise from the airport operations.

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OBJECTION TO REGIONAL PARK INVESTIGATION AND THE CONCEPT FOR A 'PARKLAND' CITY

My client's property as well as parts of the Aerotropolis core is subject to an investigation for a regional park.

A regional park on my client's property is not supported (or properties within the 3km wildlife buffer zone) as it conflicts with the draft Wildlife Buffer zone, which is set to minimise wildlife strikes that can cause major damage and compromise aircraft safety.

The property, and many parts of the Aerotropolis core, are within the 3km wildlife buffer zone. Any proposed regional parks should be located outside these high-risk areas, which is the safest option rather than 'micro'-mitigating.

Mitigation measures are ineffective unless they can be willingly enforced by property owners and/or government authorities as it relies on ongoing funding to keep mitigation measures in place. These matters are generally difficult to enforce and require ongoing education, particularly if the intent is to also create a leafy 'parkland' city.

If the State is insistent on incorporating a regional parkland, it should be located and integrated with areas proposed to be rezoned 'Environment and Recreation', particularly on properties with the largest landholdings (i.e. [REDACTED] and [REDACTED]) for equity purposes. For example, the area beyond 3km of the buffer and where Thompsons Creek meets South Creek on [REDACTED] would be more appropriate.

With regards to the concept of creating a 'parkland' city, it conflicts with the concept for an 'Aerotropolis' City.

Extensive landscaping across the precinct to create a 'parkland' city would potentially result in an unintended, unsatisfactory level of wildlife attraction that may compromise aircraft safety.

In particular, wildlife attraction would be exacerbated by the fact that the remainder of Western Sydney has overall low levels of vegetation, which wildlife would be competing against for habitat. This is inconsistent with the National Airport Safeguarding Framework, which specifies the principles of eliminating sources that are attractive to wildlife.

This may also result in delays in the future development approvals process as extensive landscaping requirements will conflict with aircraft safety requirements.

Furthermore, it is requested the shading of the 'Parkland Investigation Area' be removed from all future plans and diagrams. This is affecting land value as it is causing wariness amongst developers and future investors.

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## BIODIVERSITY CERTIFICATION

We request that all land within Enterprise and Mixed-Use Zones as well as the 3km wildlife buffer zone be biodiversity certified when rezoned.

The retention and rehabilitation of remnant natural vegetation within these areas will increase the chances of wildlife strikes that compromise aircraft safety.

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Without biodiversity certification, development approvals could result in extensive delays, which would hinder the prompt and orderly establishment of the new city.

It may also hinder the operations of the new airport if sufficient vegetation within the 3km buffer zone is not cleared due to the lack of biodiversity certification.

This would also be more equitable for smaller landowners who do not have the financial means to engage in an ecologist and undertake environmental assessment and approvals under State and Federal legislations.

Should the Authority require further information, please do not to hesitate to contact the undersigned.

Regards,

**Momcilo (Momo) Romic**

**BTP (UNSW), MEM (UNSW)**

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