

MARCH 2021

DRAFT AEROTROPOLIS PRECINCT PLAN

KRILICH SUBMISSION— [REDACTED] ELIZABETH DR, LUDDENHAM

PREPARED BY: ANTHONY KRILICH

[REDACTED]

DRAFT AEROTROPOLIS PRECINCT PLAN

INTRODUCTION AND PROPERTY

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 on behalf of the Mr Lenko Krilich, the owner of [REDACTED] Elizabeth Drive Luddenham and the Krilich family.

2600 Elizabeth Drive, Luddenham	[REDACTED]	11.62Ha
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Lenko Krilich is also part of the *Luddenham Landowners Consortium* and this submission is made in addition to this group submission.



Above – The site location.

RECOGNITION OF COUNTRY

The land owner agrees with the principles of recognising country and recognises the importance of Connecting to Country. The land owner 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.

Lenko Krilich has been a custodian of this land since 1963 and understands his lands character and attributes, to a greater extent than other people, Government or other organisations do.

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 custodian of the land and all future custodians.

BACKGROUND TO THE DISTINCTIVENESS OF THE LAND

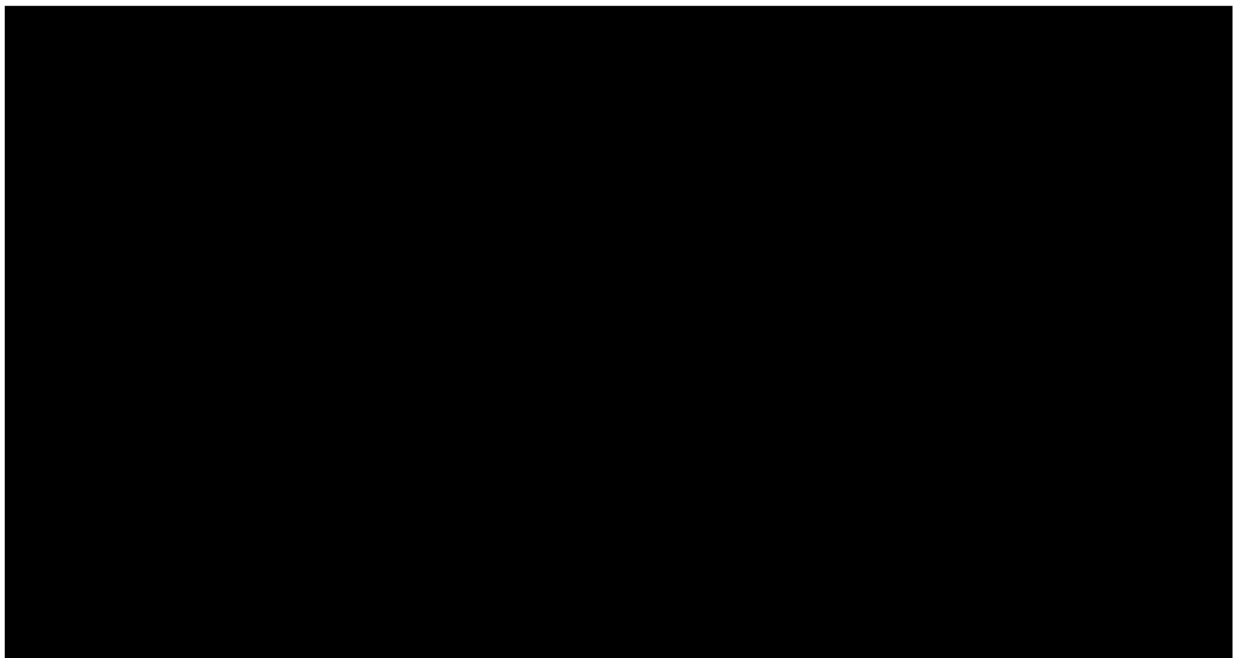
The distinctiveness of this and other surrounding landholdings (that form part of the *Luddenham Landowners Consortium*) is required to be highlighted in considering this individual submission.

STRATEGIC PLANNING BACKGROUND:

The landholding is **NOT** within the **Metropolitan Rural Area (MRA)** identified by the Western City District Plan, as compared to most of the remainder of the *Agribusiness Precinct*.

The landholding 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 outside of the *WSEA SEPP* was identified clearly as being *future employment land*.

The landholding was also subsequently identified within the **Western Sydney Priority Growth Area**. The landholding was taken out of this *WSEA SEPP* by the *Aerotropolis SEPP*, and now forms part of the *Agribusiness Precinct* along with other lands not originally identified for employment purposes.



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

The landowner and others within the *Luddenham Landowners Consortium* have consistently been emphasising this distinction between these landholdings and the remainder of the *Agribusiness Precinct* in our joint submissions. The landowner believes that being the 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.

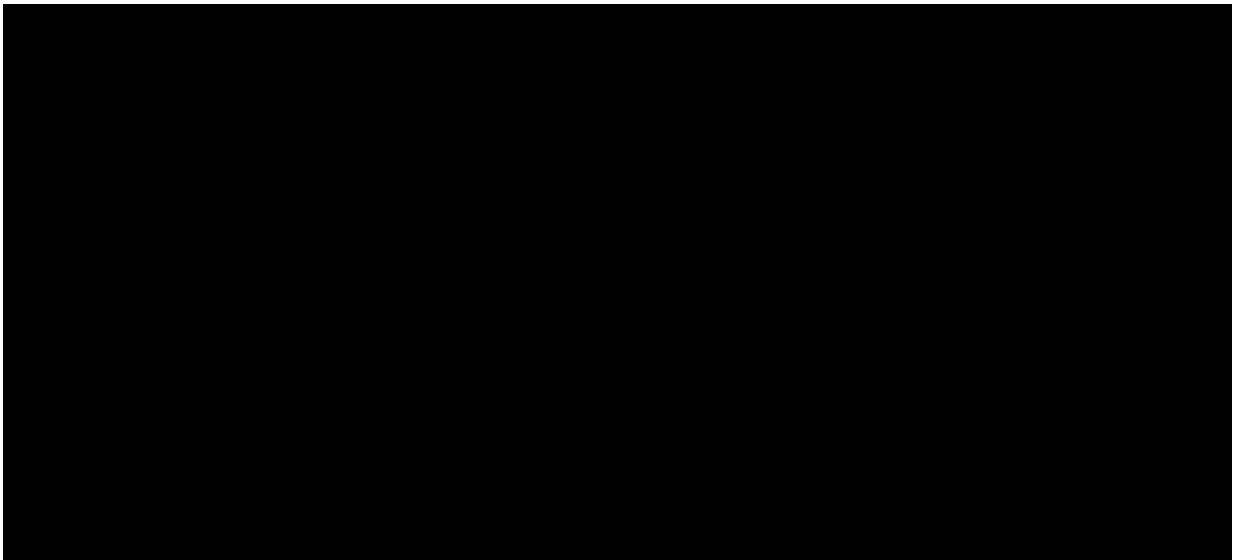
The property is also significantly **wholly within the Western Economic Corridor (WEC)** identified in the Western City District Plan.

The Western Economic Corridors' significance in planning for regional Sydney is identified in *A Metropolis of Three Cities* by the *Greater Sydney Commission*. Details 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 landowner agrees with this statement and the *Draft Plan* should recognise the development of the WEC within its planning framework. 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 site location on western edge of Airport and in the Western Economic Corridor.

Unfortunately, the *Draft Plan* does not do this and the question of the *Western Sydney Planning Partnership* needs to be asked why this is?

From a landowners point of view, this seems to be a clear case of having some double standards and unfairness in the development of the *Precinct Plan* and the Aerotropolis as a whole.

The *Draft Plan* (and other concurrent documents such as the *Draft PIC*) should be amended accordingly to recognise that this landholding and 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 process and should have the same planning hierarchy, fairness and consistency 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 (like other areas), as compared to the remainder of the *Agribusiness Precinct*.

TRANSPORT CORRIDORS AND CONNECTIVITY:

The site and area 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 locale of the site).

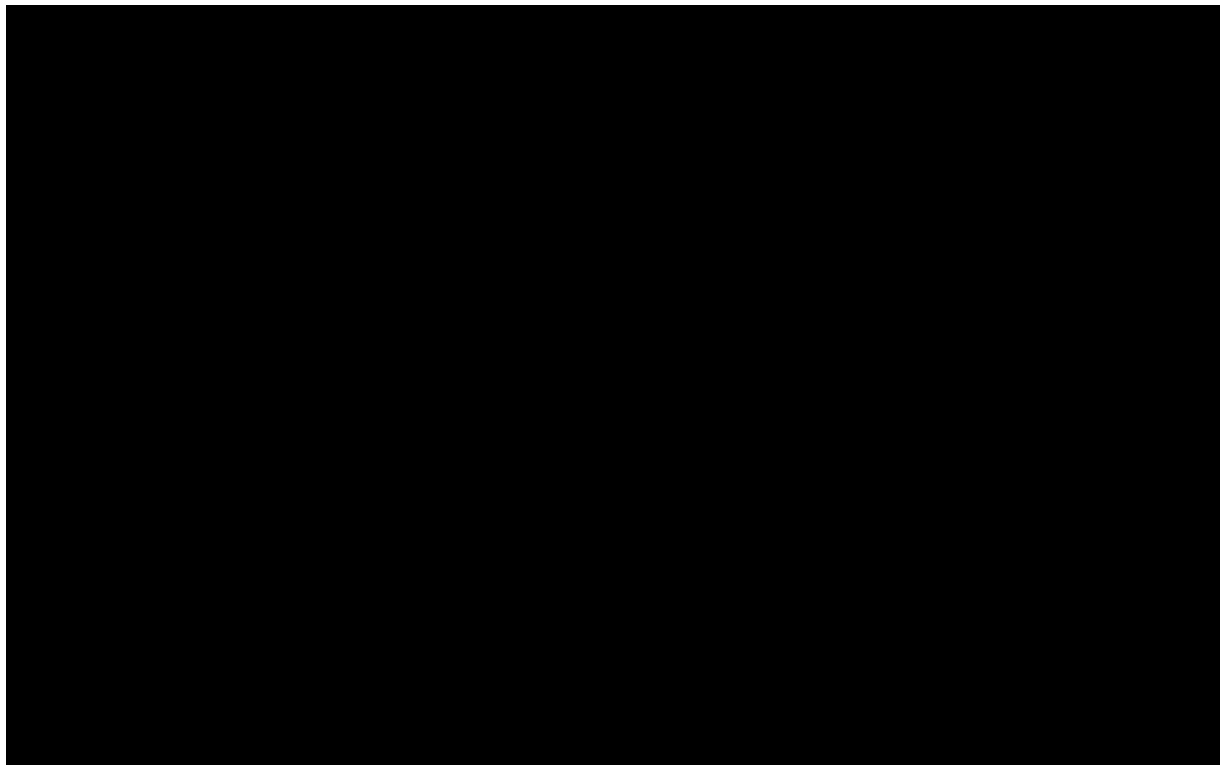
The *Draft Plan* does not adequately address the transport access attributes of our land with respect to the road and transport connections for this area, and also the potential for access to a Metro Station within the Airport site.

The *Luddenham Landowners Consortium* 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 on Page 95 of the *Draft Plan*, consideration for cycle path access to the Airport at Anton Road is proposed with a continuation of this path hinted in this diagram. This is shown in the extracts below. 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.



Active Transport Corridors

Western Sydney Aerotropolis

-  Principal regional cycle path network (off road)
-  Cycle paths through open space
-  Cycle paths within the streetscape
-  Wianamatta - South Creek Crossing

As already stated, the *Draft Plan* (and also 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.

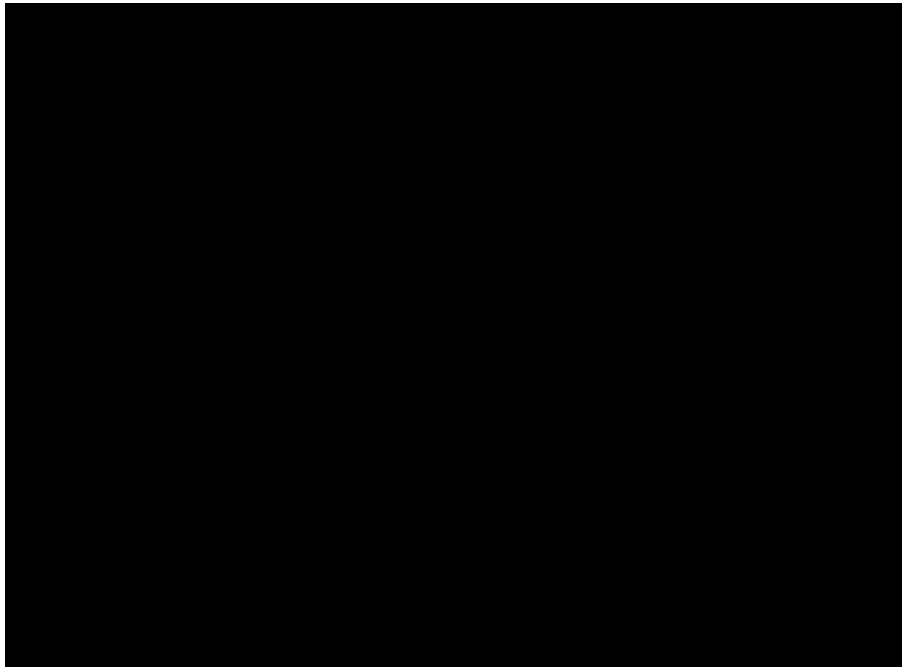
The **many benefits** from such a proposal as highlighted in the submission included:

- 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.

This is a serious option and not considering it would be an enormous missed opportunity for development and functioning of the Western Parkland City and for the Aerotropolis.

Regardless of whether Metro access is provided or not, the locale is still provided with the **best integrated road transport and freight access** arrangements within the Aerotropolis. This includes the following features clearly shown on the *Aerotropolis Transport Strategy Plan* presented in Figure 19 of the *Draft Plan* (as shown below):



- 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 site;
- The connection of Elizabeth Drive to the new M12 Motorway, just east of the site;
- The connection of the Northern Road and Luddenham Road to the existing M4 Motorway, north of the site;
- The proposed Anton Road Nth connection to the western boundary of the Airport and to a new potential signalized intersection with Elizabeth Drive **on the western side of this site**;
- 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.

Road and access for transport and freight are not restricted in this 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 site 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.

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

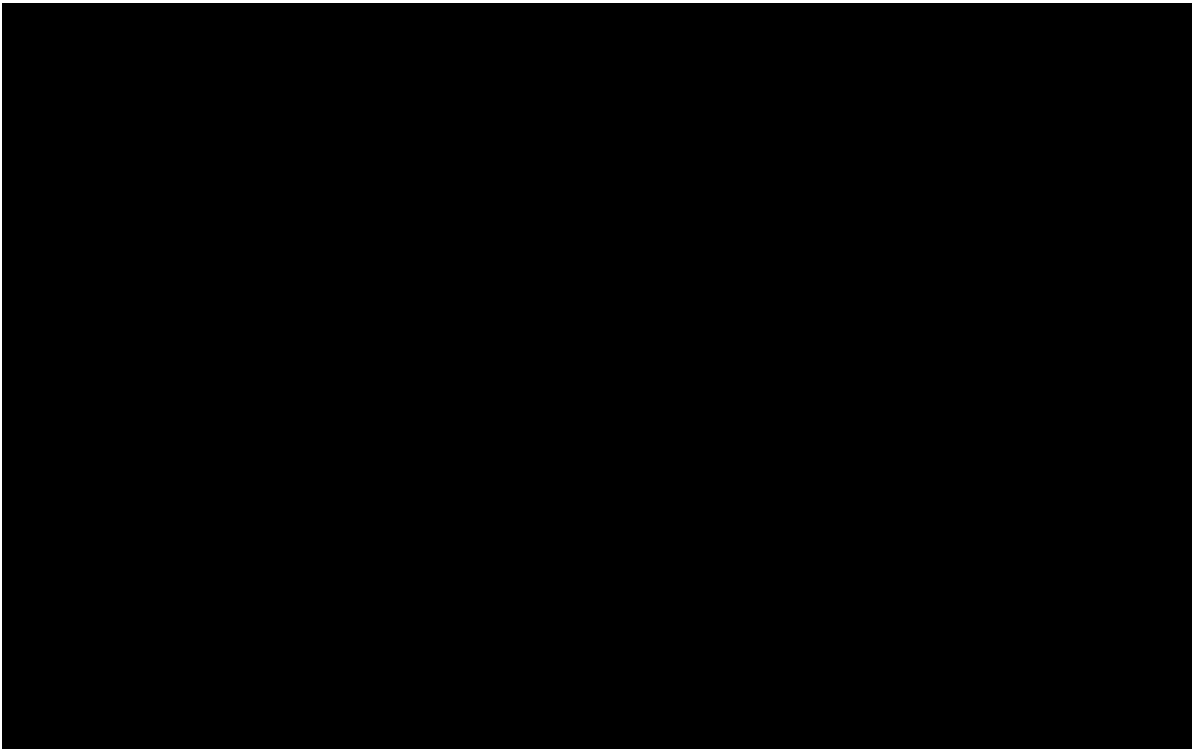
Being within the same water catchment area, the site is poised for easier servicing and connections for water, sewer, and recycled water. The site is wholly within the Wianamatta/South Creek Catchment area that enables water and sewer servicing, as compared to the majority of the *Agribusiness* Precinct 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 site in relation to this proposed network is seen on the attached diagram on the following page, with the northern boundary of our land is 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 site, and that will provide for potable water to the *Aerotropolis*.

Electricity, natural gas connections and 5g connections are also in place and available/nearby to the site.



THE TRANSPORT FRAMEWORK – 60M WIDE TRANSGRID EASEMENT

The site is encumbered by the **60m wide Transgrid Easement** and Tower 508 is present on this site. Tower 508 has a height of **37.6m** above ground level (as advised by Transgrid) and the wire height associated with this easement area is also very high.

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 than just a typical overhead easement area with some token low height landscaping that no one wants to use.

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 site and the immediate area is significantly constructed with a **due north/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/south 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 Airport, which is not on a true north/south runway orientation.



Above – The 60m wide Transgrid Easement (red area) is constructed as due north/south over this area of the Aerotropolis (true north/south and east/west longitude/latitude grids shown).

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 site, as compared to many other areas in the Aerotropolis.



Above – The 60m wide Transgrid Easement viewing due south from Elizabeth Drive boundary.

As an example, this area could 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 neighbouring 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 *Draft 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** and is a perfect area to incorporate this in the future Aerotropolis.

There are many examples of electric or hybrid trucks under development. Some of these interesting links are as follows:

[Volvo FL all-electric truck set to be trialled in Australia | Drive Car News](#)

[Scania launches fully electric truck with 250 km range](#)

Many of these future electric vehicles will however continue to be combined with the use of existing traditional vehicles (such as diesel trucks). For example, freight bringing in a farm product from distant areas of Western NSW to the Aerotropolis could transfer its load to modern electric vehicles in one of these areas. **Transfer hubs** as part of a future truck logistics network is an example that the Transgrid easement could be used for, or be part of.

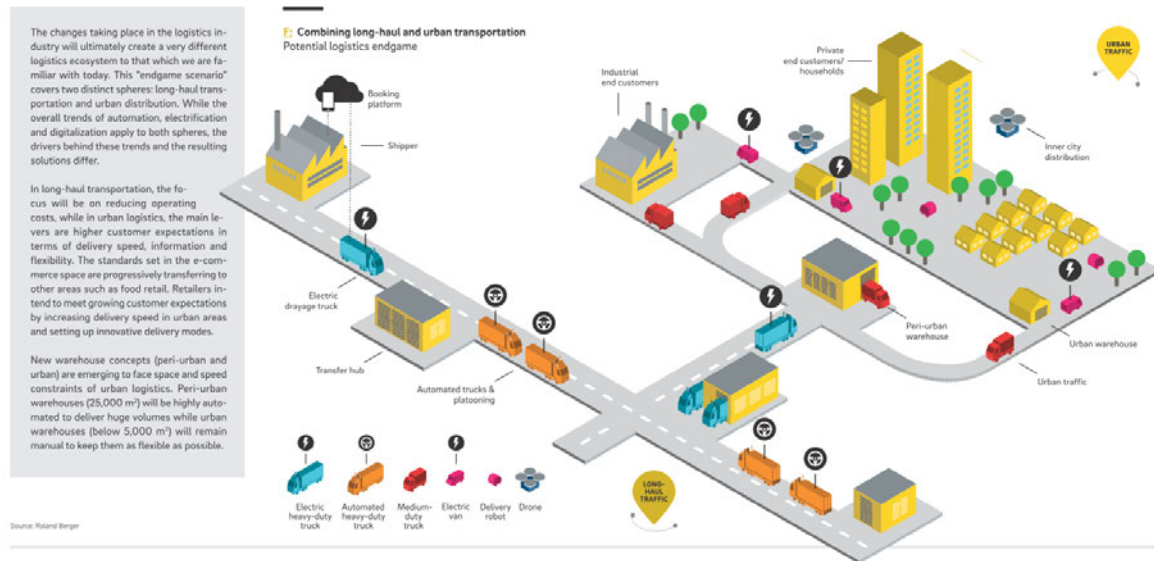
Roland Berger from Germany has identified future business models for trucking freight companies and the future of electrification, automation and the use of these transfer hubs. An example of how this can work is shown on the following page.

The Transgrid easement area could provide an excellent area for a transfer hub and for parking, loading/unloading and charging of electric trucks, in combination with conventional trucks and freight systems.

The nearby area also could offer the additional potential for other methods of transport, such as hydrogen charging for future hybrid freight vehicles that are also proposed and being developed around the world.

The endgame scenario

A new logistics ecosystem.



The *Draft Plan* indicates that a *challenge* for this easement is to 'retain and protect the 60m wide Transgrid easement and ensuring sufficient access to manage and maintain' (p.53). The above uses are examples of how the 60m wide Transgrid Easement can be used whilst still maintaining the requirements of Transgrid for upkeep and maintenance of the easement.

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 smart development of this valuable easement area.

THE HEIGHT AND BUILT FORM FRAMEWORK – BUILDING HEIGHTS 24-27M

Land within the identified 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). The reasons for this distinctiveness have been discussed in this submission.

A **building height of 24-27m** should apply for this locality.

As mentioned, the site is encumbered by the 60m wide Transgrid Easement that provides for an existing building height that far exceeds 24-27m. A height and built form of 27m or less would be much lower than the Transgrid easement structure that encumbers the site which for Tower 508 is **37.6m** above

ground level (as advised by Transgrid). The *Height Plan* for buildings in Figure 31 should therefore reflect this existing structure height.

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 and Parkland City.

The WEC area and this property should at least match the heights within the *Badgerys Creek Precinct* area heights (which also follows the identified WEC area), which are at 24m, where compliant with the OLS height limit.

The Requirements listed under **Point LU4** of Part 3.4.3 of the *Draft Plan* should also be amended for the exclusion of this land 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 the area or are low in height where they are present.

The *Draft Plan* should therefore be amended to allow for a 24-27m height to this Western Economic Corridor of the *Agribusiness Precinct*.

THE HEIGHT AND 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 my 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 TRANSPORT FRAMEWORK – ROAD ALIGNMENTS AND PATTERNS / ANTON ROAD NTH ALIGNMENT

The extension of Anton Road towards Elizabeth Drive and the *Northern Gateway* should look at a re-alignment to follow more closely the existing lot boundaries, the alignment of Anton Road to the north of Elizabeth Drive, and the parallel alignment with the 60m wide Transgrid Easement.

Road layouts within the *Draft Plan* should closely follow the existing alignments of the boundaries of existing lots within the locale and have some recognition of these lot boundaries.

Anton Road Nth is also proposed to be located over our land in what is a least favourable location of steepest gradients that would involve large batters for road construction and alter the shape and vision of the rear hilltop behind my property.

Requirement AM5 in the *Draft Plan* states that a requirement for the road network is to '*align street grids with landform features*' which this alignment of Anton Road Nth doesn't propose. The road location from a Country point of view should limit the impact upon ancient hilltops and vistas and be located more along lower ridges and areas (as seen to the west of this proposed location).

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 than seen in the remainder of the document.

As mentioned previously, the 60m Transgrid Easement that crosses this site and locale 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.

Anton Road Nth is shown as being parallel with the 60m wide Transgrid Easement to the north of Elizabeth Drive and hence is on a true north orientation. Anton Road Nth could be continued in the same parallel true north alignment south of Elizabeth Drive in this Western Economic Corridor area, so as to make the most beneficial use of the Transgrid Easement. Areas to the east of Anton Road Nth could therefore be aligned to Transgrid Easement orientation for its street patterns and layout (a level of detail which could be worked out in future with landowner input via a masterplanning process).

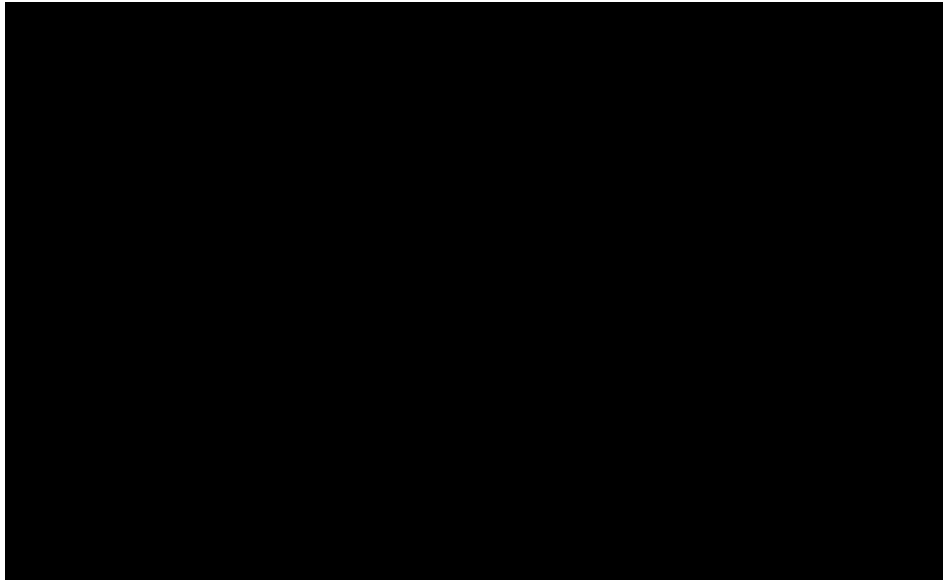
Anton Road Nth should be made to more closely follow the existing alignment and of the western boundary of Lot [REDACTED] (which correlates better to the existing Anton Road alignment) and be located closer to the common boundary with Lot [REDACTED] (this site) and Lot [REDACTED] (the neighbouring western lot to our site).

Anton Road Nth should be made to more closely follow the existing alignments of the boundaries of existing lots and have some recognition of these lot boundaries. Road orientation to the existing alignment of the existing Anton Road should occur over the Cosgrove Creek area to fit in with the due north alignment of the new Anton Road Nth.

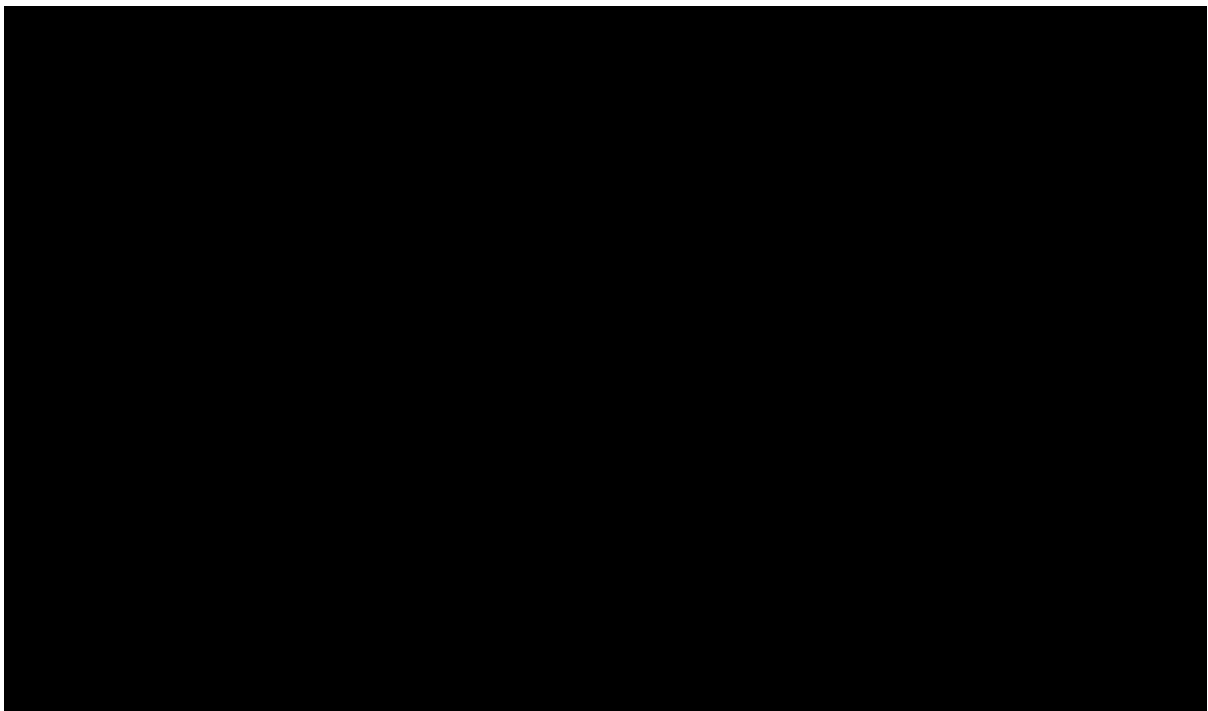
By investigating at least the re-alignment of Anton Road Nth, a better outcome for subdivision of the landholdings could occur and which would involve minimal change to the remainder of the *Precinct Plan*. The road network arrangement on the northern side of Elizabeth Drive and to development on the southern side of Adams Road would remain unaltered by investigating and adopting this option.

SECTION 5 – SEQUENCING PLAN AMENDMENT

The sequencing plan for the area is shown in the Figure 66 of the *Draft Plan* in Section 5. This sequencing plan is based on the *Draft PIC*. The **Luddenham Landowners Consortium** 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 **Luddenham Landowners Consortium** 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 *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 Consortium 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 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 landholdings in this area 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 connection 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.

THE OPEN SPACE FRAMEWORK – REDUCTION IN OPEN SPACE

The *Draft Plan* proposes a vision for the Parkland City that includes large extents of parkland, riparian corridors and nature parks. The extent of these areas is considered to be large and onerous on many landholders, including our lands.

As explained previously, the land is distinct from the remainder of the *Agribusiness* Precinct (such as the Western Economic Corridor being located over the land). The open space extent over this land and neighbouring 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*.

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**.

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 direct 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 my 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. 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*. We have owned and farmed this land since 1963 and the extent of the 'disturbed soil' is known and this doesn't match this plan. Evidence for the disturbance of the soil is available.

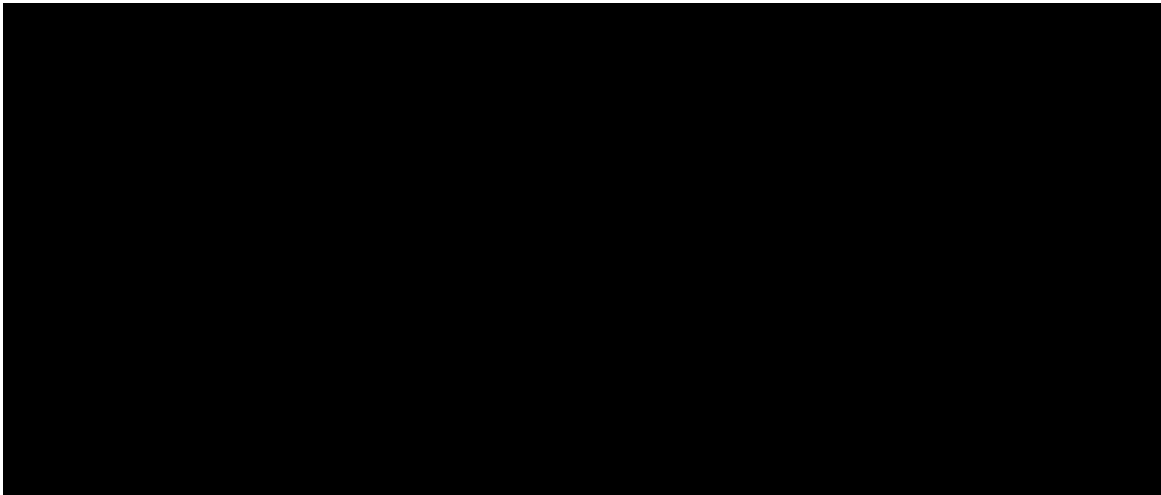
The extent of undisturbed soil areas on many of these landholdings presented by the *Draft Plan* is therefore wrong.

Other justifications and assumptions made by the *Draft Plan* are therefore also questioned as to their accuracy in making plan judgements.

INTERACTIVE WSUD DRAINAGE BASIN LOCATIONS

The *Interactive WSUD Drainage Basin Locations* shown in Figure 12 of the *Draft Plan* need clarity on correct and required location of basins. For example, a basin location on the western side of this property is located outside of the Open Space Framework of the *Draft Plan* and in an area that is generally a hilly area and not completely in a drainage area.

This for example should be removed as a drainage basin location. Other locations in the *Draft Plan* should also be checked and confirmed.



CONCLUSION

In conclusion, we hope that the issues raised in this submission will be considered favourably and matters addressed accordingly. We thank the *Western Sydney Planning Partnership* on the opportunity to comment on the *Draft Aerotropolis Precinct Plan*.

AUTHOR

This submission has been prepared by Anthony Krilich.



.....
Anthony Krilich
Benchmark Building Certifiers
Suite 5 Level 2 496 High Street
PENRITH NSW 2750