

# Planning Proposal

## Amendment to Helicopter Flight Paths in the Liverpool Local Environmental Plan 2008

23 August 2021

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## Introduction

In late 2020, Council received correspondence from Liverpool Hospital advising that the Helicopter Flight Paths (HFPs) for their main helicopter landing site (HLS) have been realigned (Figure 1). HFPs are protected through Clause 7.17A of the Liverpool Local Environmental Plan 2008 (LLEP 2008) to ensure the safe and effective operation of the helicopter ambulance service is maintained.

To ensure the LLEP 2008 remains up-to-date and current, an amendment is required to reflect the realigned HFPs.

At Council's ordinary meeting on 28 April 2021, it was resolved that Council:

1. *Directs the CEO to prepare a planning proposal to amend the Liverpool Local Environmental Plan 2008 to align with Attachment 1.*
2. *Note that the Planning Proposal will be sent to the Liverpool Local Planning Panel for comment.*
3. *Receives a further report noting the advice from the Liverpool Local Planning Panel.*

This planning proposal seeks to amend the Key Sites Map in accordance with the updated flight paths as provided by Liverpool Hospital (Attachment 1 and Figure 2).

## Site description

The HFP's cover numerous lots within the Liverpool and Fairfield LGA's as depicted in Figure 1. This planning proposal itself applies to numerous lots (Figure 2) within Liverpool only, with the majority contained within the Liverpool City Centre.

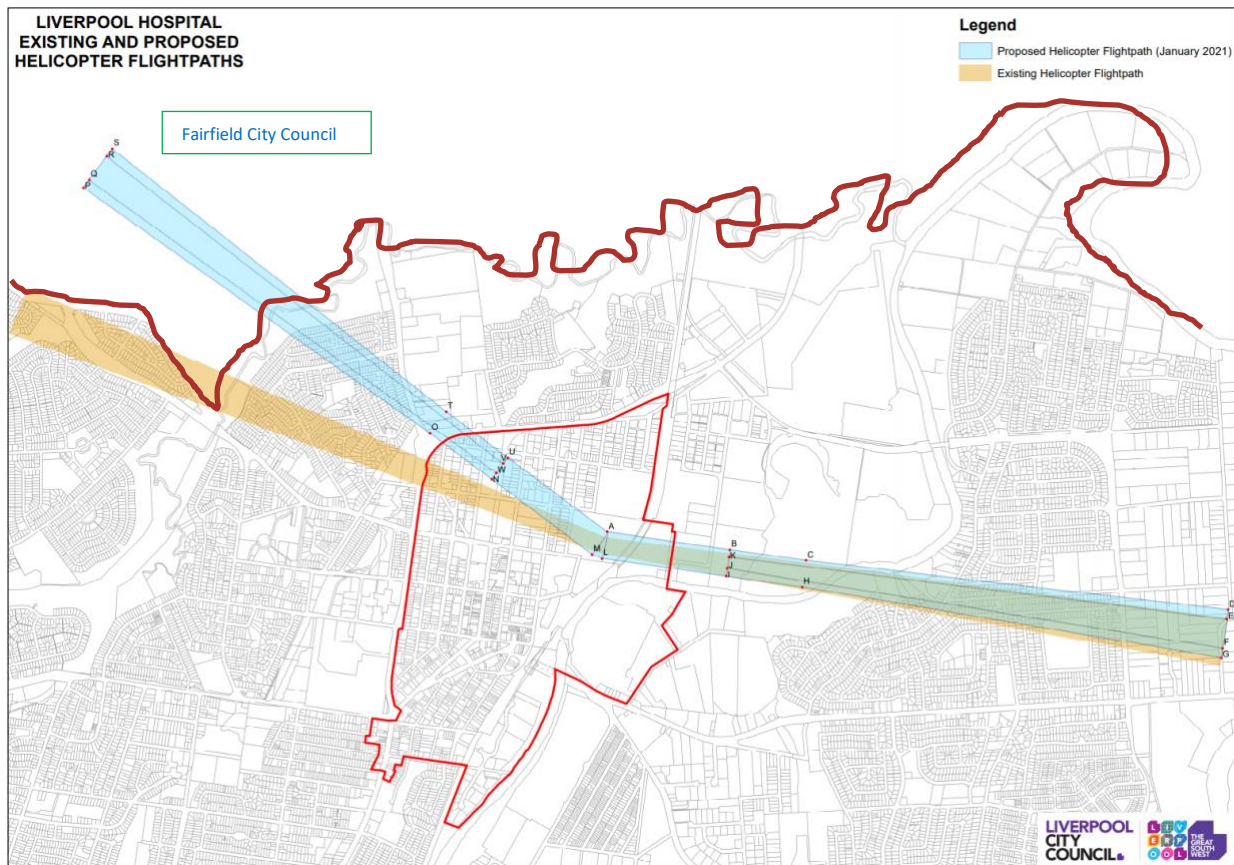


Figure 1: Location of existing and proposed Helicopter Flights Paths

## Background

In late 2015, concern was raised regarding proposed building height increases in the Liverpool CBD and how the proposed heights may impact air space on the emergency HLS for Liverpool Hospital.

At the time, Council determined that there was potential for conflict between development outcomes and Liverpool Hospital’s emergency HFPs and examined strategies to protect these flight paths. In 2017, *Clause 7.17A Hospital helicopter airspace* was introduced into the LLEP 2008 that requires development applications that are under or intrude the HFP to be referred to Liverpool Hospital for comment. This clause ensures the hospital helicopter airspace is protected.

### Liverpool Hospital

Liverpool Hospital is classed as a tertiary referral hospital within the SWSLHD, meaning that it receives patients in critical condition for emergency care. The Hospital’s helicopter landing site (HLS) is crucial to maintaining its tertiary referral status, underscoring the importance of a review of existing planning controls in order to protect the integrity of the facility.

Every year, Liverpool Hospital admits over 3000 trauma patients, including over 500 seriously injured and poly-trauma patients requiring Intensive Care or High Dependency admission. The NSW Ambulance Service has protocols which bypass other hospitals within the SWSLHD to transport patients to Liverpool when specific ‘serious injury’ criteria are met.

Many of Liverpool Hospital’s critically ill or injured patients are transferred by helicopter, a service which plays a vital role in the provision of emergency care. An effective and safe helicopter ambulance service relies on both the optimal location of the HLS within the hospital itself, and a clear flight path free from obstruction.

## Part 1 – Objectives

The objective of this planning proposal is to amend the LLEP 2008 to be consistent with the realigned HFPs as provided by Liverpool Hospital (Attachment 1).

## Part 2 – Explanation of provisions

This planning proposal seeks to amend the Key Sites Map in accordance with the updated flight paths as provided by Liverpool Hospital (Attachment 1 and Figure 2). Council officers have undertaken an assessment of the realigned HFP which identified that the changes will most likely have a minor impact on properties within the Liverpool City Centre.

The assessment has also found that the redevelopment of properties outside the Liverpool City Centre will have minimal to no impact on the HFPs (as beyond this there is no likely impacts due to the existing building height limits). The key sites map should therefore only apply to land shown shaded blue in Figure 2 below.

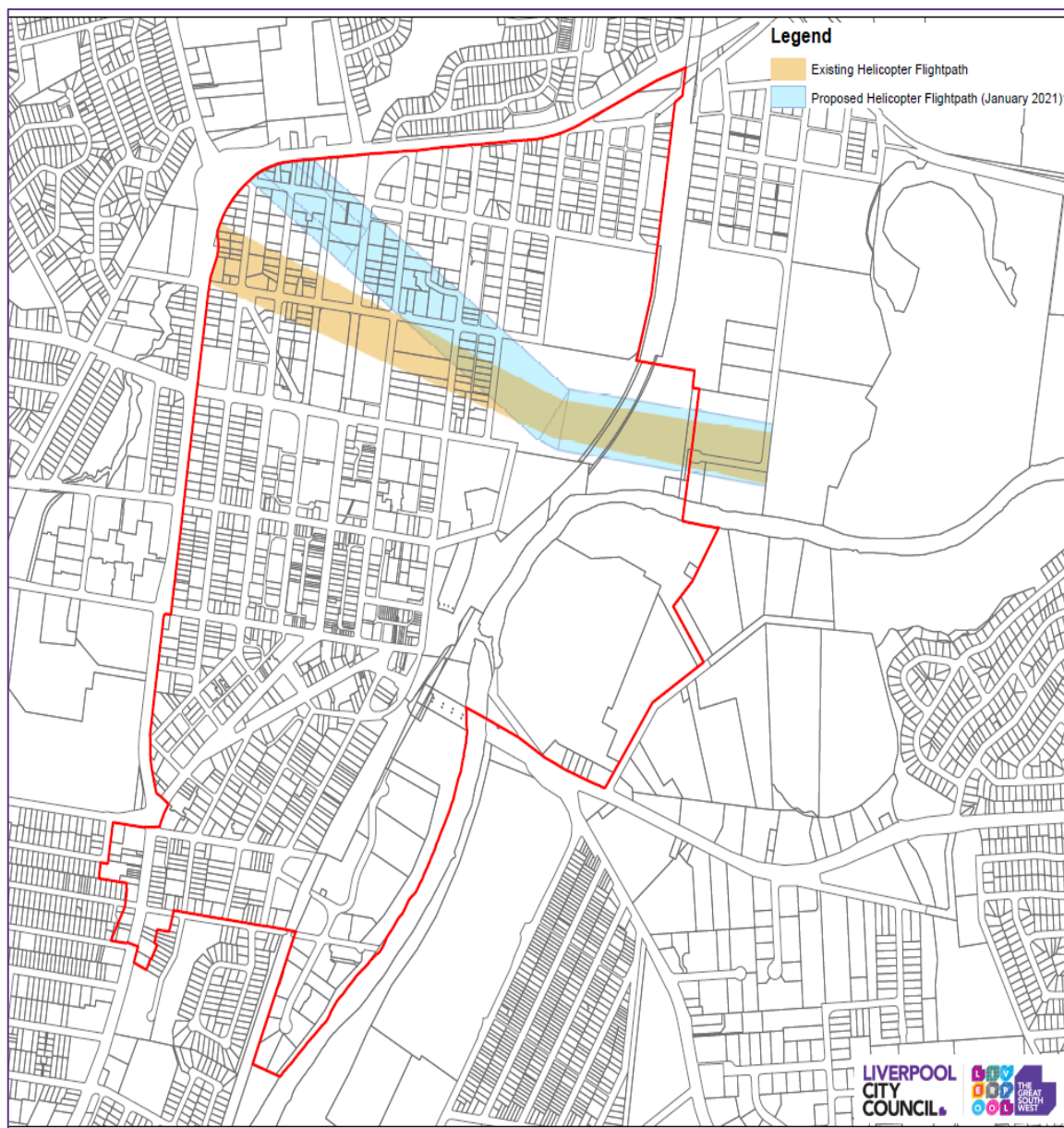


Figure 2: Key sites map to be amended to only apply to the area shaded blue (realigned Helicopter Flights Paths)

The following Key Sites Maps should be amended in accordance with Figure 2:

- KYS-010      [4900 COM KYS 010 020 20210201](#)
- KYS-011      [4900 COM KYS 011 005 20210201](#)
- KYS-014      [4900 COM KYS 014 020 20180730](#)

## Part 3 – Justification

### Section A – Need for the planning proposal

*3.1 Is the planning proposal a result of an endorsed local strategic planning statement, strategic study or report?*

No, the planning proposal is not the result of an endorsed local strategic planning statement, strategic study or report.

*3.2 Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?*

Yes, amending the Key Sites maps is the best means of achieving the intended outcome.

### Section B – Relationship to strategic planning framework.

*3.3 Will the planning proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?*

#### A Metropolis of Three Cities

The planning proposal will give effect to the following objectives of the Greater Sydney Region Plan 2018, *A Metropolis of Three Cities*:

- **Objective 6:** Services and Infrastructure meet communities' changing needs

The proposed amendment will facilitate the provision of Objective 6 by ensuring health infrastructure is maintained and protected i.e. protecting the Helicopter Flight Paths and Helicopter Landing Site. The proposed amendment will ensure critically ill patients can be transported by air ambulance (Emergency Helicopter) to Liverpool Hospital.

- **Objective 21:** Internationally competitive health, education, research and innovation precincts

*Strategy 21.1: Develop and implement land use and infrastructure plans for health and education precincts that:*

- *create the conditions for the continued co-location of health and education facilities, and services to support the precinct and growth of the precincts*
- *have high levels of accessibility*
- *attract associated businesses, industries and commercialisation of research*
- *facilitate housing opportunities for students and workers within 30 minutes of the precinct.*

The proposed amendment will facilitate the provision of Objective 21 by ensuring services (emergency helicopter landing sites) can be maintained to support the precinct and growth of the precincts.

Western City District Plan

The planning proposal also gives effect to the following priority and action of the Western City District Plan:

- **Planning Priority W1: Planning for a city supported by infrastructure**
  - *Objective 1 Infrastructure supports the three cities.*
  - *Objective 2 Infrastructure aligns with forecast growth – growth infrastructure compact.*
  - *Objective 3 Infrastructure adapts to meet future needs.*
  - *Objective 4 Infrastructure use is optimised.*

The proposed amendment will facilitate Planning Priority W1 by ensuring the hospital’s infrastructure (emergency helicopter landing site) is protected and maintained to support the existing and growing population. The proposed amendment also supports Objectives 1-4 within W1.

- **Planning Priority W2: Working through collaboration**

The proposed amendment will ensure essential health infrastructure is maintained and protected through the protection of the HFP. This has been achieved through collaborating with Liverpool Hospital to best understand how this can occur as facilitated by the proposed amendment.

*Assessment Criteria*

Assessment Criteria have been established to assist proponents or a Principle Planning Authority (PPA) justify a planning proposal. Refer to Table 1 below for an assessment of the planning proposal against the prescribed criteria.

*Table 1 - Assessment of strategic and site-specific merit*

| <b>Consideration</b>  | <b>Merit</b> | <b>Justification</b>  |
|---|--------------|---|
| <b>Does the proposal have strategic merit? Will it:</b>   |              |   |
| Give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment; or | Yes          | The proposal has demonstrated that it will give effect to these strategic plans and documents, as outlined in section 3.3 of this report.               |
| Give effect to a relevant local strategic planning statement or strategy that has been endorsed by the Department or required as part of a regional or district plan or local strategic planning statement; or  | Yes          | An assessment against the Connected Liverpool 2040 Liverpool Local Strategic Planning Statement (LSPS) has been provided in Section 3.4 of this report. |
| Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing strategic plans.   | Yes          | The proposal will ensure health infrastructure (HFP & HLS) are maintained and protected.  |
| <b>Does the proposal have site-specific merit, having regard to the following?</b>  |              |   |

| Consideration   | Merit | Justification  |
|---|-------|--|
| The natural environment (including known significant environmental values, resources or hazards); and   | Yes   | The proposed amendment will not change any existing controls that currently mitigate against impacts to the natural environment.   |
| The existing uses, approved uses, and likely future uses of land in the vicinity of the proposal; and   | Yes   | <p>The existing uses present on the subject site will remain. The future uses (including permitted building heights) in the vicinity are not necessarily restricted by Clause 7.17A.</p> <p>The referring LLEP 2008 clause does not necessarily restrict building heights, as the impact of the application is not known until a submission has been made by the hospital and assessed by the consent authority.</p> <p>Prior to any approval of developments within the flight path, the consent authority needs to be satisfied that the development does not present a hazard to helicopters using the HFP.</p> |
| The services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision. | Yes   | It is not anticipated that the proposed amendments will create servicing and infrastructure deficiencies.  |

*3.4 Will the planning proposal give effect to a council's endorsed local strategic planning statement, or another endorsed local strategy or strategic plan?*

Connected Liverpool 2040 – Liverpool's Local Strategic Planning Statement (LSPS)

The planning proposal gives effect to the LSPS as follows:

- *Planning Priority 4* – Liverpool is a leader in innovation and collaboration

Council has received correspondence from Liverpool Hospital advising that the HFPs for their main HLS have been reviewed and ultimately relocated. To ensure the ongoing effective and safe operation of the helicopter ambulance service is maintained, the LLEP 2008 should be updated to reflect the recent review.

The proposed amendment will ensure our planning documents are up-to-date and in accordance with best practice.

- *Planning Priority 9* – Safe, healthy and inclusive places shaping the wellbeing of the Liverpool community



The proposed amendment will facilitate Planning Priority 9 by ensuring the hospital's infrastructure (emergency helicopter landing site) is protected and maintained to support the wellbeing of the Liverpool (and Regional) community.

- *Planning Priority 10* – A world-class health, education, research and innovation precinct

The proposed amendment will facilitate Planning Priority 10 by ensuring the hospital's infrastructure (emergency helicopter landing site) is protected and support Liverpool Hospital as a tertiary referral hospital, magnifying the regional importance of Liverpool's health sector.

### 3.5 Is the planning proposal consistent with applicable State Environmental Planning Policies?

Table 2 - SEPP Consistency

| State Environmental Planning Policy  | Consistency   |
|--|---|
| State Environmental Planning Policy (Affordable Rental Housing) 2009   | Yes – No immediate impacts are anticipated as a result of the proposed amendment. Given that a proposal may use this SEPP to gain additional FSR and Height, the finished building height will need to be assessed by Liverpool Hospital. |
| State Environmental Planning Policy No 55—Remediation of Land  | Yes – No immediate impacts are anticipated as a result of the proposed amendment. Given that the proposed use will need to be assessed against this SEPP, the finished building height will only be determined if the use is permitted.   |
| State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004                              | Yes – Any future dwelling/s construction will be required to adhere with the requirements of BASIX, as stipulated within the SEPP   |
| State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development (2002 EPI 530) | Yes – No immediate impacts are anticipated as a result of the proposed amendment.   |

### 3.5 Is the planning proposal consistent with applicable Ministerial Directions (Section 9.1 directions)?

Table 3 - Section 9.1 Directions Consistency

| Section 9.1 Direction                | Complies | Justification   |
|--------------------------------------|----------|---|
| <b>Business and Industrial Zones</b> |          |   |
| 1.1 Business and Industrial Zones    | Yes      | Within the Liverpool City Centre, the HFP is located over a small section of B4 – Mixed Use and R4 High Density Residential zoned land. This Planning Proposal will retain the function of the land as a B4 Zone, and will unlikely result in the reduction of total potential floor space for employment uses and related public services. |
| <b>Environment and Heritage</b>      |          |   |
| 2.3 Heritage Conservation            | Yes      | Within the Liverpool City Centre, the HFP is located over, or in close proximity to some heritage conservation items or areas including Liverpool Memorial Pioneer's Park and Bigge   |

| Section 9.1 Direction   | Complies | Justification   |
|---|----------|---|
|   |          | Park. This Planning Proposal does not affect the integrity or ongoing conservation of these sites.  |
| <b>Housing, Infrastructure and Urban Development</b>          |          |   |
| 3.1 Residential Zones   | Yes      | Within the Liverpool City Centre, the HFP is located over R4 High Density Residential zoned land. This Planning Proposal will retain the function of the R4 zoned land.   |
| 3.4 Integrated Land Use and Transport                         | Yes      | The essence of this Planning Proposal is to cohesively integrate land use and emergency transport. Referral requirements for buildings that encroach the OIS will ensure that development applications for permanent or temporary structures are reviewed by the relevant authority prior to construction.  |
| 3.5 Development near Regulated Airports and Defence Airfields | Yes      | The Planning Proposal does not include any changes to the LLEP 2008 that would permit a building to encroach with the Bankstown Airport Obstacle Limitation Surface (OLS) without consent. This Planning Proposal will not compromise the operations of Bankstown Airport (including aircraft flying in the vicinity).  |
| <b>Regional Planning</b>                                      |          |   |
| 5.10 Implementation of Regional Plans                         | Yes      | Consistency with A Metropolis of Three Cities is outlined in Section B earlier in this report.  |
| <b>Local Plan Making</b>                                      |          |   |
| 6.1 Approval and Referral Requirements                        | Yes      | The Planning Proposal seeks to amend the Key Sites Maps in accordance with updated HFPs as provided by Liverpool Hospital.<br><br>Council will be seeking to amend the Key Sites Maps in accordance with Figure 2. The current wording requires all development applications to be referred to Liverpool Hospital for comment even if the application is well underneath the HFP. |

## Section C – Environmental, social, and economic impact

### *3.6 Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?*

There are no other likely environmental effects as a result of the planning proposal. The proposal ensures the efficient and safe movement of helicopter travel to and from Liverpool Hospital.

### *3.7 Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?*

There are no other likely environmental effects as a result of the planning proposal. The proposal ensures the efficient and safe movement of helicopter travel to and from Liverpool Hospital.

### *3.8 Has the planning proposal adequately addressed any social and economic effects?*

#### Social Effects

This Planning Proposal demonstrates that the proposed amendment accords with the relevant strategic planning framework and is likely to result in a net community benefit. Positive social impacts include preservation of the helicopter flight path for seriously ill or injured patients.

#### Economic Effects

This Planning Proposal demonstrates that the proposed amendment accords with the relevant strategic planning framework and is likely to result in a net economic benefit, particularly with reference to ongoing growth and investment in the health precinct in Liverpool City Centre. The proposal will have a positive economic impact by supporting the health precinct while providing increased certainty for development in the City Centre.

#### Potential Impact of Realigning the Western HFP (Liverpool City Centre)

Based on the mapping provided by Liverpool Hospital, 72 allotments (whole or part within the Liverpool City Centre) will potentially be impacted by the realigned western HFP, as compared to 77 allotments affected by the current western HFP.

Council officers have undertaken an assessment of the realigned HFP which identified that the changes will most likely have only a minor impact, due to the following reasons:

- There are 72 allotments (whole or part) that are affected by the realigned western HFP within the Liverpool City Centre (excluding Liverpool Pioneers' Memorial Park);
- 17 of these properties are currently impacted by the current HFPs;
- 34 of the 72 allotments within the new alignment are already strata subdivided, meaning any redevelopment of these properties is unlikely;
- Of the remaining 38 allotments, one Torrens title allotment has recently been developed as a mixed-use building with dwellings above. According to Council's records, this development is yet to be strata subdivided;
- The realigned HFP impacts fewer developable properties;
- The remaining 37 allotments (Torrens Title) still have development potential. Some of these current uses include:
  - o Sydney South West Private Hospital;
  - o Medical centre / medical uses i.e. radiology, x-ray etc.
  - o Office premises;
  - o Private dwellings; and
  - o Affordable / social housing.

However, many of these 38 allotments are constrained by neighbouring strata development or existing medical uses that may also limit their development potential. Figure 3 shows the existing strata allotments underneath the realigned western flightpath.



Figure 3: Impacted allotments showing Strata and Non strata allotments

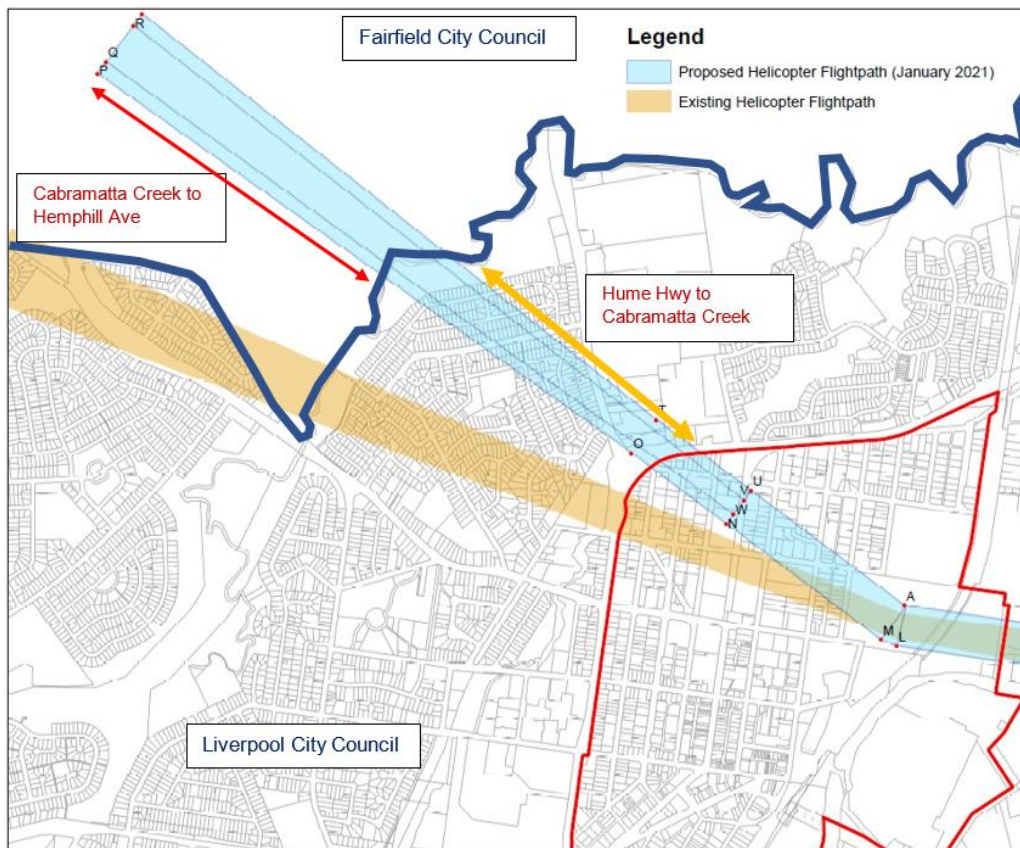


Figure 4: Realigned Western Helicopter Flight Path

### The Current HFP

- There are 77 (whole or part allotments) that are affected by the current western HFP within the Liverpool City Centre. The majority of these properties will no longer be impacted or will be less affected by the HFP;
- 17 of the 77 allotments affected by the current western HFP will continue to be affected by the realigned HFP.
- The current alignment impacts more developable properties than the proposed realigned HFP.

### Impact of Realigning Western HFP (outside Liverpool City Centre)

The changes to the western HFP also apply to properties outside of the Liverpool City Centre, including properties within the Fairfield LGA (as shown in Figure 4).

Although the realigned HFP will apply to several properties that were not previously impacted, the permitted building heights in these areas do not penetrate the HFPs and will unlikely restrict the redevelopment of these properties in the future.

The height of the HFP starts at 42.821 AHD at Liverpool Hospital's HLS and rises to 165.621 AHD at Hemphill Avenue, Mount Pritchard (within Fairfield LGA).

### Hume Highway to Cabramatta Creek (within Liverpool City Centre)

The permitted building height in the LEP (from the Hume Hwy to Cabramatta Creek) ranges from 8.5m to 15m for the extent of the impacted properties (Figure 4). The ground level contours in this area ranges from 10-12 AHD.

The height of the HFPs between the Hume Highway and Cabramatta Creek ranges from 66 AHD to 108 AHD. It is extremely unlikely that any development in this area will penetrate the HFP.

### Cabramatta Creek to Hemphill Avenue (within Fairfield LGA)

The landform from Cabramatta Creek rises sharply from 6 AHD to 60 AHD at Hemphill Avenue. The permitted building height as stated within the Fairfield Local Environmental Plan 2013 is 9m (underneath the western HFP).

The height of the HFPs between Cabramatta Creek and Hemphill Avenue ranges from 116.5 AHD to 165.621 AHD. Again, it is extremely unlikely that any development within these properties will penetrate the HFP.

As it is extremely unlikely that the redevelopment of properties outside the Liverpool City Centre will impact the HFPs, Clause 7.17A, in effect, only applies to development within the Liverpool City Centre. It is recommended that the key sites map be amended to only apply to land shown in Figure 2.

### Impact of Realigning the Eastern HFP

As a result of the review of the HFPs undertaken by Liverpool Hospital, it was identified that the eastern HFP will also need to be updated due to more accurate mapping provided (Figure 5). This report recommends the key site map in the LEP is updated in accordance with the revised mapping provided by Liverpool Hospital.

The height of the HFP starts at 42.821 AHD at Liverpool Hospital's HLS and rises to 165.621 AHD at Riverside Road Chipping Norton.

The minor changes to the eastern HFP will have minimal to no impact on the additional properties as the permitted building heights do not penetrate the HLP. It is unlikely that re-development of these properties will penetrate the HFP.

However, to safeguard any future issues directly east of Liverpool Hospital it is recommended that the eastern HFP is mapped to western boundary of land owned by Sydney Water in accordance with Figure 2.

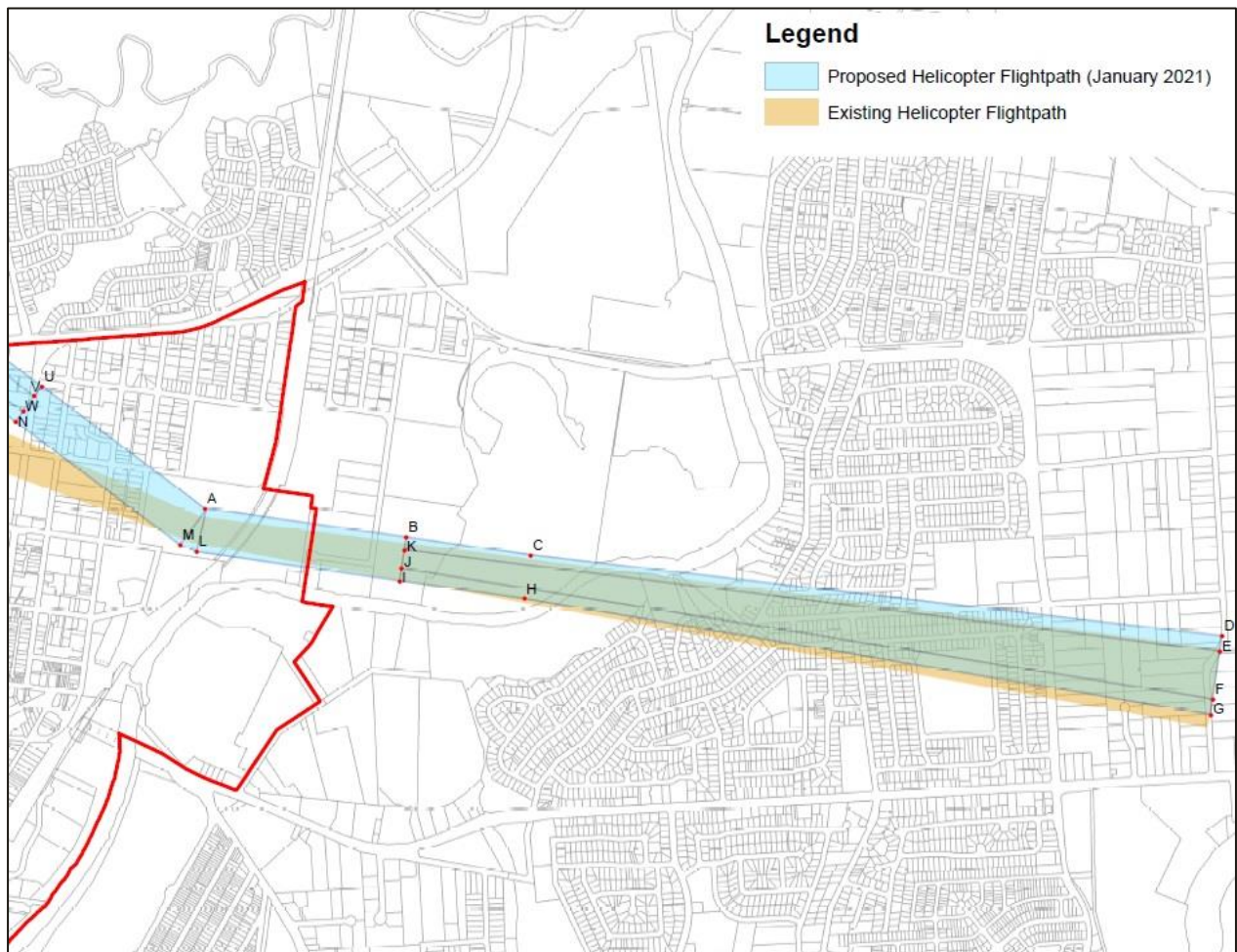


Figure 5: Realigned Eastern Helicopter Flight Path

## Section D – State and Commonwealth interests

### 3.9 Is there adequate public infrastructure for the planning proposal?

The Planning Proposal will not require any additional, or modification to existing, infrastructure.

### 3.10 What are the views of state and Commonwealth public authorities consulted in accordance with the Gateway determination?

The views of state and Commonwealth public authorities will be considered following Gateway determination. The following government agencies should be considered:

- Department of Infrastructure, Transport, Regional Development and Communications;
- Civil Aviation Safety Authority (CASA);
- NSW Department of Health;
- Fairfield City Council;
- Liverpool Hospital;

- Air Ambulance NSW; and
- Bankstown Airport.

## Part 4 – Mapping

The existing and proposed LLEP 2008 mapping is shown below.

### Key Site Maps

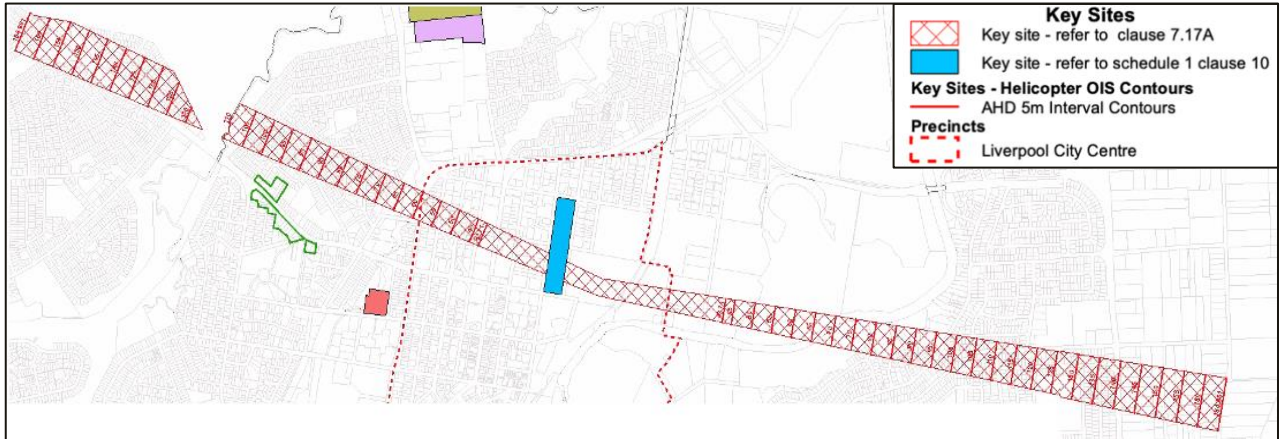


Figure 6: Existing Key Site map - Helicopter Flight Path

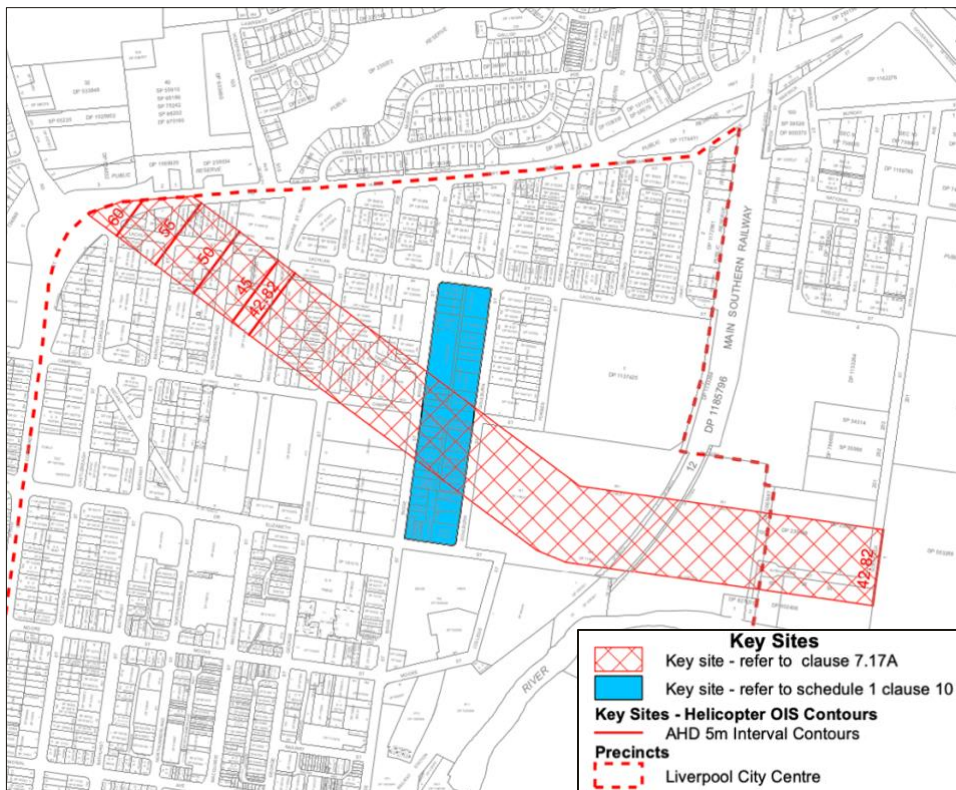


Figure 7: Proposed Key Site map - Helicopter Flight Path

## Part 5 – Community Consultation

Community consultation will be undertaken in accordance with the Gateway determination.

## Part 6 – Project Timeline

An anticipated project timeline is shown in Table 4.

*Table 4 - Anticipated project timeline*

| Timeframe                          | Action  |
|------------------------------------|---|
| <b>May 2021</b>                    | Presented at the Local Planning Panel meeting             |
| <b>July 2021</b>                   | Presented to Liverpool City Council                       |
| <b>August 2021</b>                 | Submission of Planning Proposal to DPIE                   |
| <b>September 2021</b>              | Gateway Determination issued                              |
| <b>October 2021</b>                | State agency consultation                                 |
| <b>October 2021</b>                | Community consultation                                    |
| <b>November 2021</b>               | Consideration of submissions and proposal post-exhibition |
| <b>November 2021</b>               | Post-exhibition report to Council                         |
| <b>December 2021- January 2022</b> | Legal drafting and making of the plan                     |



# Attachment 1 – Realigned Helicopter Flight Paths January 2020



**NOTES:**

The Design Development Overlay (DDO) is based on optimal helicopter flights into and out of the Liverpool Hospital. The DDO identifies the horizontal and vertical extent of the airspace that must be protected against incursions by governing authorities to enable the safe movement of helicopters into and out of the Hospital.

The Object Identification Surface (OIS) and Visual Flight Rules (VFR) Approach/Departure Paths are defined per the *Guidelines for Hospital Helicopter Landing Sites in NSW, Issued July 2020 (GL2018\_10)*.

The geometry of the protected airspace has been derived using the OIS for this site and extended to the edge of the VFR approach/departure paths.

The contours shown on this plan represent the height at which a proposed development is spatially restricted. Proposed developments that extend above the contours on this plan must obtain approval from the Aviation Authority.

Contour interval 0.5 metres.

Height datum is Australian Height Datum 1971.  
Horizontal datum is MGA, zone 56 GDA94.

Survey mark PM 52192 has been adopted as the MGA94/AHD71 origin. Coordinates supplied by Survey Control Information System (SCIMS):

308581.382 E  
6245096.797 N  
16.906 AHD71

Surveyed: 20/11/2020

GIS boundaries have been sourced by the NSW Land & Property Information. PDA Surveyors accepts no responsibility for the accuracy of the data.

**SITE PLAN - DESIGN DEVELOPMENT OVERLAY**

SCALE: 1:30,000

| DDO GEOMETRY - LIVERPOOL HOSPITAL WESTERN FLIGHT PATH |            |             |         |
|---|------------|-------------|---------|
| COORDINATES - MGA56 - GDA94 - AHD71                   |            |             |         |
| NO.   | EASTING    | NORTHING    | HEIGHT  |
| A   | 308751.524 | 6244820.819 | 42.821  |
| M   | 308667.046 | 6244696.684 | 42.821  |
| N   | 308106.502 | 6245115.638 | 42.821  |
| O   | 307763.257 | 6245372.182 | 65.661  |
| P   | 305827.566 | 6246744.136 | 192.081 |
| Q   | 305859.250 | 6246786.526 | 165.621 |
| R   | 305957.536 | 6246918.021 | 165.621 |
| S   | 305989.220 | 6246960.410 | 192.081 |
| T   | 307853.100 | 6245492.381 | 65.661  |
| U   | 308196.332 | 6245235.819 | 42.821  |
| V   | 308170.622 | 6245201.422 | 42.821  |
| W   | 308132.213 | 6245150.035 | 42.821  |

| DDO GEOMETRY - LIVERPOOL HOSPITAL EASTERN FLIGHT PATH |            |             |         |
|---|------------|-------------|---------|
| COORDINATES - MGA56 - GDA94 - AHD71                   |            |             |         |
| NO.   | EASTING    | NORTHING    | HEIGHT  |
| A   | 308751.524 | 6244820.819 | 42.821  |
| B   | 309437.723 | 6244722.870 | 42.821  |
| C   | 309861.947 | 6244662.316 | 65.661  |
| D   | 312218.441 | 6244386.464 | 192.081 |
| E   | 312210.961 | 6244334.073 | 165.621 |
| F   | 312187.758 | 6244171.553 | 165.621 |
| G   | 312180.279 | 6244119.162 | 192.081 |
| H   | 309840.737 | 6244513.757 | 65.661  |
| I   | 309416.517 | 6244574.333 | 42.821  |
| J   | 309422.587 | 6244616.846 | 42.821  |
| K   | 309431.654 | 6244680.357 | 42.821  |
| L   | 308723.737 | 6244673.259 | 42.821  |

**LEGEND:**

- DDO PERIMETER
- PROPERTY BOUNDARY
- PROTECTED AIRSPACE

