

Broader WSEA Draft Structure Plan

Submission to Exhibition

A submission in response to the Exhibited *Broader WSEA Draft Structure Plan* to adjust the boundary to include 585-649 Mamre Road, Orchard Hills and an extended associated land area, as the *Subject Land* within the boundary of the final *Structure Plan* for the *Broader WSEA*.

Prepared by Colin Rockliff on behalf of the landowners, Mandalong Investments Pty Ltd.

585-649 Mamre Road, Orchard Hills (Lot 2171 DP 115 3854)

Submission Statement

The Government's purpose and objective in exhibiting the *Broader WSEA Draft Structure Plan* is to make Employment Lands available for development.

The only thing missing for the *Subject Land* is the planning instrument to allow such development at no cost to Government. All infrastructure services are available and development can proceed.

A first step to putting in place the planning instrument is to include the *Subject Land* within the *Broader WSEA* by a boundary adjustment of the *Structure Plan*.

26 August 2013 (v4final)

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EXECUTIVE SUMMARY

This submission is made on behalf of the landowners of 585-649 Mamre Road, Orchard Hills in response to the exhibited *Broader WSEA Draft Structure Plan*.

The potential development site 585-649 Mamre Road, Orchard Hills has been considered in its local planning context, and an extended associated land area is proposed as the *Subject Land*. The extended land area is proposed to responsibly assess the issues and opportunities in proposing that the boundary of the final *Structure Plan* for the *Broader WSEA* is adjusted to include the *Subject Land*. The development site 585-649 Mamre Road has a net area of 48 hectares and the extended *Subject Land* an area of approximately 193 hectares.

The Government's purpose and objective in exhibiting the *Broader WSEA Draft Structure Plan* is to make Employment Lands available for development.

The only thing missing for the *Subject Land* is the planning instrument to allow such development at no cost to Government. All infrastructure services are available and development can proceed. The immediately available 48 hectare development site within the *Subject Land*, would represent a significant tangible outcome of the Government's initiatives to provide Employment Lands in Western Sydney.

A first step to putting in place the planning instrument is to include the *Subject Land* within the *Broader WSEA* by a boundary adjustment of the *Structure Plan*.

Accordingly, the submission proposes an adjustment to the boundary of the *Broader WSEA* in addition to the adjustments already included in the *Draft Structure Plan*

Subject Land



Structure of this submission;

- Proposed Boundary Adjustment (Section 2)
- Investigation Reports (Section 3)
- Response to Draft Structure Plan (Section 4)

The Investigation Reports and the assessment of the proposal to include the *Subject Land* against each criteria addressed in the *Draft Structure Plan* concludes the *Subject Land* benefits from already available infrastructure services and meets any of the criteria to include the land within the final *Structure Plan* and can proceed to rezoning.

Although other properties are included within the *Subject Land* there is no onus on those properties or landowners to do anything in response to being included in the final *Structure Plan* and ultimately the rezoning to follow. The properties can continue under their existing uses however, the Government would have responsibly considered a future use for those properties consistent to their future suitability and as a logical extension to the surrounding land uses.

The site 585-649 Mamre Road is a large parcel of land, generally flat, able to be fully serviced in the short term and can be responsibly included with extended land, so that the *Subject Land* would be a logical continuation of the Western Sydney Employment Lands. To remain excluded from the *Broader WSEA* would be a significant missed opportunity by Government and a failure to make full utilization of available infrastructure before incurring the cost to add infrastructure.

Mandalong Investments request a meeting with the *Broader WSEA* team to discuss the proposed inclusion of the *Subject Land* as described in this submission.

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Reports;

- Appendix A : **Site Conditions & Infrastructure Services Assessment Report** by Costin Roe Consulting Pty Ltd
- Appendix B : **Traffic Road Access Assessment Report** by TRAFFIX

1. Introduction

This submission is made on behalf of the landowners Mandalong Investments Pty Ltd, of 585-649 Mamre Road, Orchard Hills in response to the exhibited *Broader WSEA Draft Structure Plan*.

It is understood the Government's timetable following close of Exhibition August 2013, is;

- Department report to Minister by end 2013
- Precinct Planning for the first precinct will commence in early 2014
- Rezoning by end 2014

The proponent is willing to participate in the process to meet the above timetable, and could commence Precinct Planning in early 2014 (or earlier) funded by the proponent for the *Subject Land*.

Mandalong Investments request a meeting with the *Broader WSEA* team to review the content of this submission and discuss the proposed extension of the final *Structure Plan*, and to address any additional investigation works required with respect to the *Subject Land*.

2. Proposed Boundary Adjustment

The land proposed that be included in the final *Broader WSEA* boundary includes 585-649 Mamre Road and an extended land area to the north, as the *Subject Land* of this submission. The boundary of the *Subject Land* being the natural land features of the creeks to the West and North, and Mamre Road on the East and the Pipeline on the South, the current North boundary of the exhibited *Broader WSEA*.

Figure 1 : ***Subject Land Aerial Map***

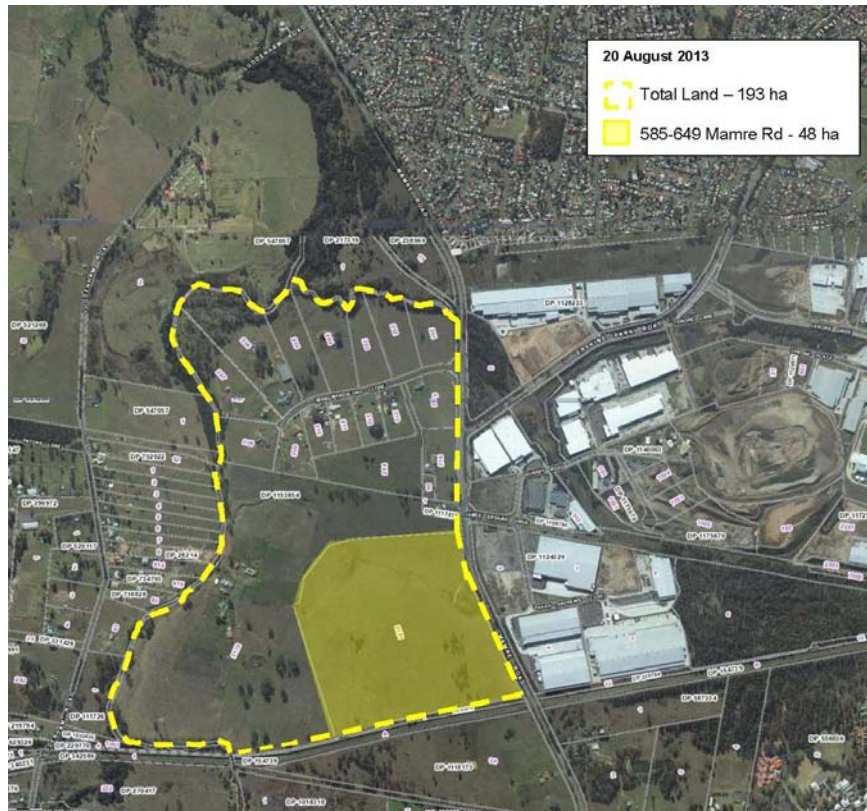
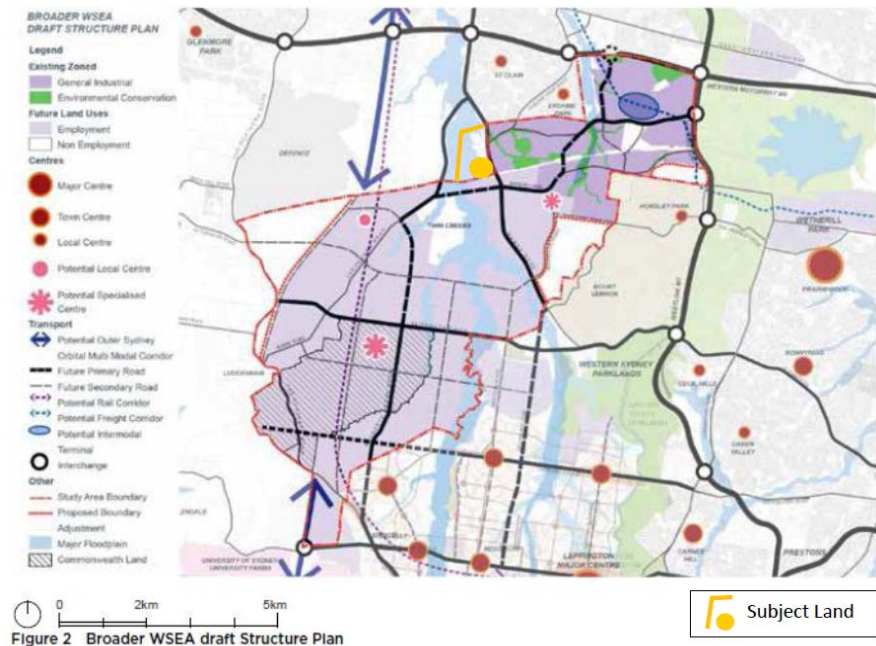


Figure 2 below is the exhibited *Broader WSEA Draft Structure Plan* with the *Subject Land* of this submission marked. It appears the boundary of the exhibited plan is arbitrary and simplistically stopping at the Pipeline as the Northern boundary of the *Broader WSEA*. Whereas, natural features such as the proposed creek boundaries and land use boundaries, are more appropriate. For instance inclusion of the *Subject Land* completes the Employment land use to the West creek limitation and to the North creek, National Parks / Reserves and Public Recreation limitation.

Figure 2 : **Broader WSEA Draft Structure Plan**



Accordingly, if the *Subject Land* is included, the Employment Lands of both the *Existing WSEA* and the now proposed *Broader WSEA* would be a coherent and uninterrupted land use, rather than the area of the *Subject Land* remaining a pocket of inconsistent Rural zoned land.

Additionally, the *Subject Land* is currently not productive farmland given the poor soils and poor pasture, accordingly there is no economic purpose in retaining this land area for rural use.

Inclusion of the *Subject Land* offers a large land parcel (48 hectares) together with the potential for a mix of land parcels (Small Lots) , and presents the opportunity for the DoPI to “tidy-up” what will obviously be Employment Land in the future.

The *Subject Land* is readily suitable for Employment Lands development;

- **Site Conditions;**
 - Landform – the land is very flat, similar to Melbourne land, which is not normally available in Sydney. Accordingly, land development costs are comparatively low fort Bulk Earthworks land forming (retaining walls etc)
 - Flooding – has been provided for in the subdivision (refer notes below) based on the investigation by Costin Roe (refer Section 3)
- **Infrastructure;**
 - Services – are currently available for connection to the property to service the development uses refer investigation report by Costin Roe (Section 3). Importantly, this should be a major consideration to include

the *Subject Land* as it will result in the responsible utilization of existing infrastructure, rather than cause added investment to provide infrastructure.

- Road Access – existing roads are available to service the *Subject Land* where those roads have more than adequate capacity for the additional traffic generation. Similar to the Services Infrastructure, the proposal to include the *Subject Land* will make efficient use of Mamre Road by double loading an existing road ie. achieving a 100% rather than 50%, utilization of an existing infrastructure investment. Also, the *Subject Land* is at the Western end of the recently completed *Link Road* to Old Walgrove Road / M7 motorway, again making full use of an existing infrastructure investment.

Notwithstanding additional detailed investigation is required and liaison / approval by the relevant authorities, all the necessary services are available in the short term to the property and most importantly the land required is either owned by the proponent or within a public land reserve, and hence will not be subject to protracted negotiations to gain access.

- **Masterplan** (indicative scheme) prepared for the development site 585-649 Mamre Rd in the context of the *Subject Land*, included below in Figure 3 and 4, demonstrates the suitability of the land form and topography to accommodate large scale warehouse / distribution centres. Currently there is a significant shortage of available land for such developments in Sydney which often pushes the land cost up and results in end-user warehouse and distribution companies, developing their facilities in other capital cities such as Melbourne.

Investigation Reports are included in Appendices and the conclusions summarized in Section 3, for;

Site Conditions & Infrastructure Services by Costin Roe – Appendix A

Traffic – Road Access by TRAFFIX – Appendix B

Figure 3 : **Masterplan MP0006A**



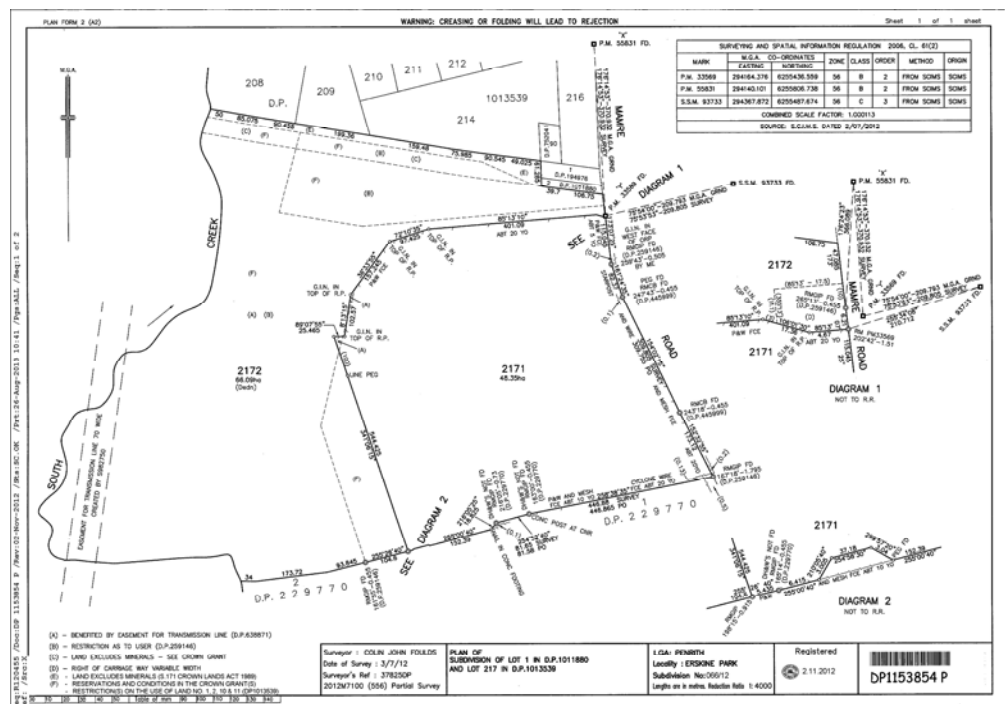
Figure 4 : Location Plan (Masterplan)



Figure 5 : Registered Plan of Subdivision

The subdivision completed respects the Flood analysis and has now established the legal entity of 585-649 Mamre Road as Lot 2171, as the Development Site to enable formal applications for utility connections, etc. Similarly, the balance of the *Subject Land* could be subdivided as and when necessary for Employment uses development in the future.

The development site within the *Subject Land* has been subdivided to provide a net site area of 48.35 hectares clear of the flood affected land west of the development site. The plan of subdivision provides for Lot 2171 of DP 115 3854.



It is also relevant to note, that in the Penrith LEP 2010 the *Subject Land* is exactly the same as the land South of the Pipeline included in the exhibited *Draft Structure Plan*, with respect to; Zoning, Flood, Lot size and Scenic & landscape values. Accordingly, there is no rationale based on Penrith Council's planning which determined the LEP 2010, to support South of the Pipeline becoming Employment Lands and the *Subject Land* remaining Rural.

Figure 6 : **Penrith LEP 2010 Land zoning map**



Figure 8 : **Penrith LEP 2010 Lot size map**

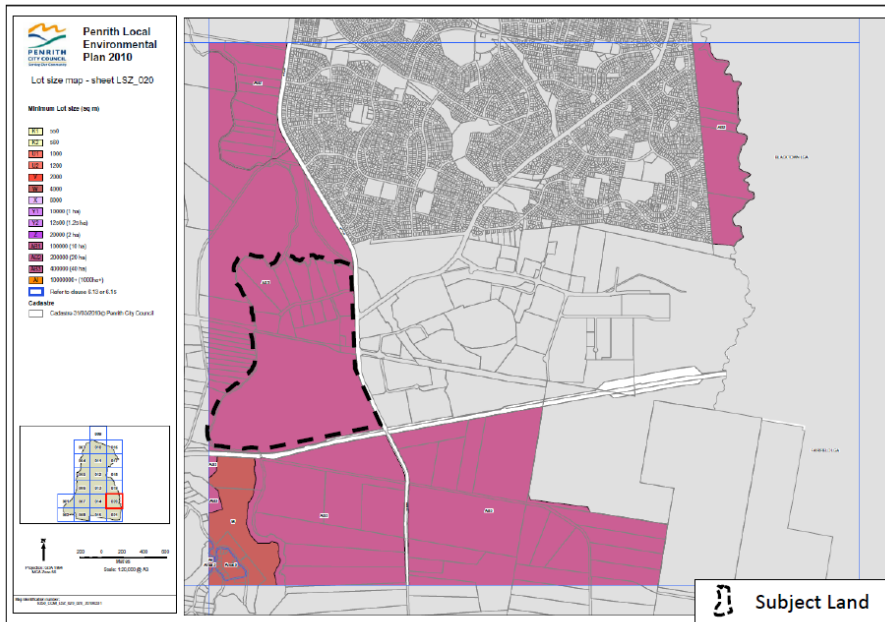
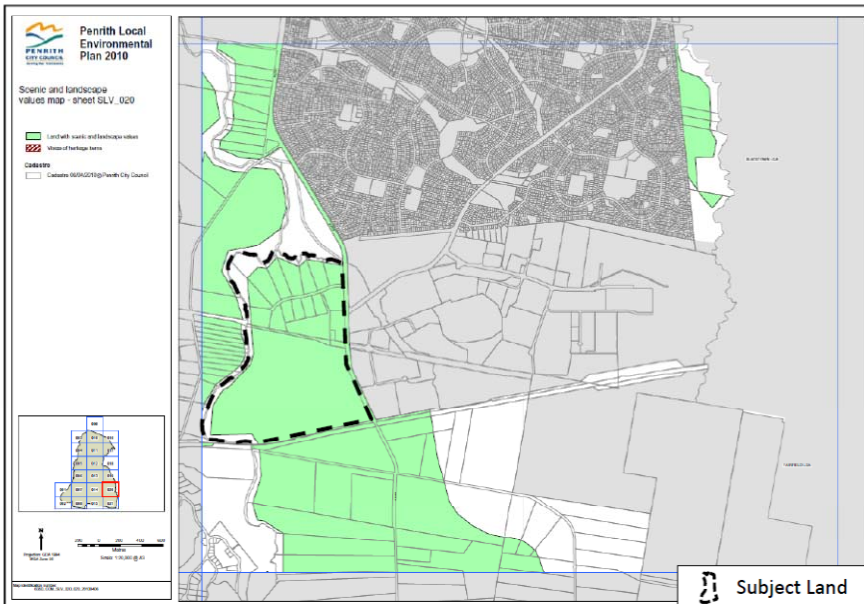


Figure 9 : **Penrith LEP 2010 Scenic and landscape values map**



The mechanism to make the land available for Employment Lands development is to initially include the *Subject Land* within the *Broader WSEA* by a boundary adjustment of the *Structure Plan*, being the first step in establishing the necessary planning instrument to allow development to occur.

3. Investigation Reports

Costin Roe Consulting engineers and TRAFFIX traffic planners were commissioned to undertake investigation and assessment of Site Conditions and Infrastructure Services, and Traffic Road Access respectively. Both firms were selected because of their considerable experience over many years on projects in the Western Sydney Employment Lands and according to their ability to identify any possible problems based on the high level investigations undertaken.

The assessment reports are included in the appendices, namely;

Appendix A : **Site Conditions & Infrastructure Services Assessment Report** by Costin Roe Consulting Pty Ltd

Appendix B : **Traffic Road Access Assessment Report** by TRAFFIX

Costin Roe Conclusion

This Site Conditions & Infrastructure Services Assessment Report has been prepared to support the proposal to include the Subject Land located at Mamre Road Orchard Hills, NSW, within the boundary of the final structure plan for the Broader WSEA

An overview of services and Penrith City Council requirements for stormwater and access has been provided to assist in the stage one due diligence process for the proposed development of the site. Specific mention has been made to on-site detention and water quality requirements.

All major services can be seen to be located in the vicinity of the site. Although not all of these services are located directly adjacent to the site, there is scope to either extend or upgrade these services to facilitate the proposed development. The servicing for the site would be completed at no cost to Government and would not impinge on the services of existing landowners.

The development is located outside of the predicted 1 in 100 year ARI South Creek flood extent. The floor levels of proposed buildings will be set at the 1 in 100 year flood level plus 500mm freeboard in accordance with the requirements of Penrith City Council and the NSW Floodplain Development Manual.

Accordingly, based on the site conditions of the land and the availability of infrastructure services to the land, the development site and its extended land area, provides an opportunity to make available additional Employment Lands in a short timeframe.

TRAFFIX Conclusion

It can be seen that the subject site (red dot) is somewhat arbitrarily located outside the BWSEA. This is considered to be a lost opportunity in terms of achieving the orderly development of employment lands for the following reasons:

- The site lies within the 'triangle' formed by three arterial roads, being Mamre Road (eastern side), Bakers Lane (southern side) and Luddenham Road (western side). These three roads will ensure that regional accessibility is maximised, with significant land being able to be redeveloped on the western side of Mamre Road (including the subject site) which would provide local, but high-level, access.*
- Mamre Road, as a primary (arterial) road, is expected to evolve with a divided road carriageway incorporating a wide (12.5m) median and as such, a road reservation of about 40 metres can be anticipated. The reservation of Mamre Road is presently 40 metres so that the site can be developed without any need for acquisition.*
- The site has an 890m frontage onto Mamre Road. This provides a unique opportunity to provide the high standard access as required under the Draft Structure Plan. Specifically, the Transport Planning Preliminary Assessment Report (Section 4.3.3 refers) identifies that land uses requiring high levels of vehicular access should be located along major roads and this would be contemplated for the subject site, with traffic signal control.*
- The proposed single, consolidated access location is situated about 550 metres south of James Erskine Drive (which could be increased if required). This is more than sufficient to overcome any requirement for signal coordination and may be compared with the existing offset between the signalised intersections of Erskine Park Road and James Erskine Drive of about 320 metres; and*

- Any decision to eliminate the subject site from the BWSEA would be a lost opportunity, as this land is very suitable for industrial purposes and failure to incorporate it at this early planning stage may result in its effective sterilisation.

It is also noted that the development of the subject site does not require any additional roads to be built or upgrades to the west, with all access onto Mamre Road which presently has ample spare capacity. That is, the staging of the subject site could be achieved in the immediate short term.

Having regard for the above, the inclusion of the subject site into the BWSEA is considered not only supportable on traffic planning grounds, but desirable.

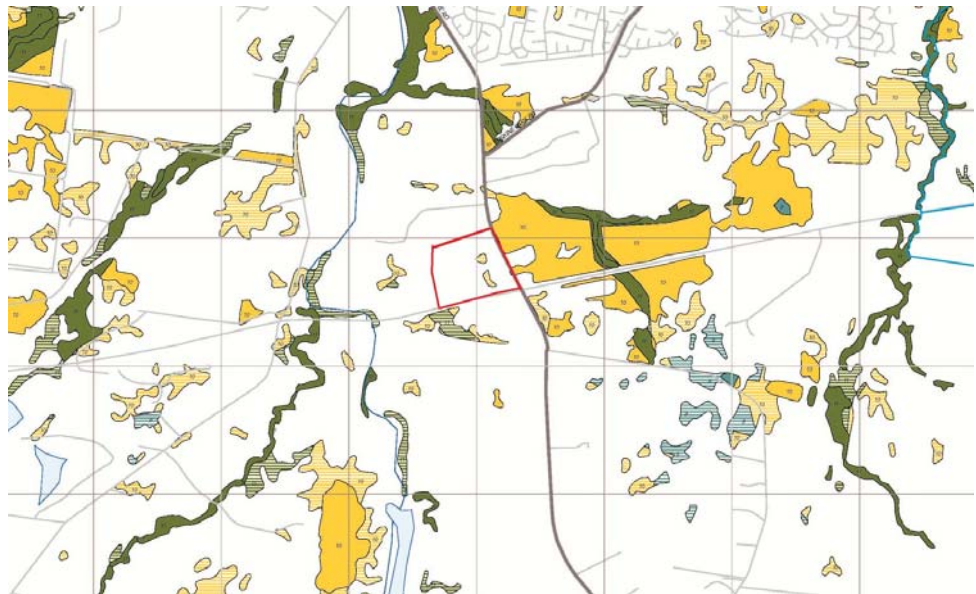
Additional investigations

In addition to the consultants reports on Site Conditions & Infrastructure Services and Traffic – Road Access, the issues of; Biodiversity and Topography have also been addressed and are summarised below.

Biodiversity

The Subject Land has little in the way of existing vegetation and is dominated by grassed areas formerly used for grazing.

Review of the NPWS Native Vegetation Mapping for the Cumberland Plain confirms that there is little in the way of existing vegetation and only two small isolated pockets of Cumberland Plains Woodland as shown following:



NPWS, Native Vegetation of the Cumberland Plain (Sheet 4 of 16) showing the subject and two isolated areas of Cumberland Plain Woodland with less than 10% canopy cover.

The site therefore does not appear to include any significant areas of vegetation, significant communities or act as a critical faunal movement corridor.

Furthermore, a detailed review of flora and fauna would normally be undertaken at Development Application stage, however there appears to be no significant biodiversity issue that would prevent the easy development of the property.

Topograhpy

Unlike other areas of the land under consideration in the broader WSEA, the Subject Land enjoys a relatively level topography, which presents itself as land suitable for larger scale industrial development.

Mamre Road represents the highest point of the site at approximately RL 36, falling to approximately RL 32 at the western boundary, therefore providing for an approximate 4 metre cross fall or less than 1% slope.

Large scale building pads can therefore be developed on the site with only limited bulk earthworks and the inclusion of low scale retaining walls.

The land is therefore highly suitable for industrial and employment style development.

4. Response to Draft Structure Plan

The exhibited plan addresses various issues and opportunities as criteria for proceeding with development under an adopted *Structure Plan* and the *Draft Structure Plan* was developed based on those issues and opportunities.

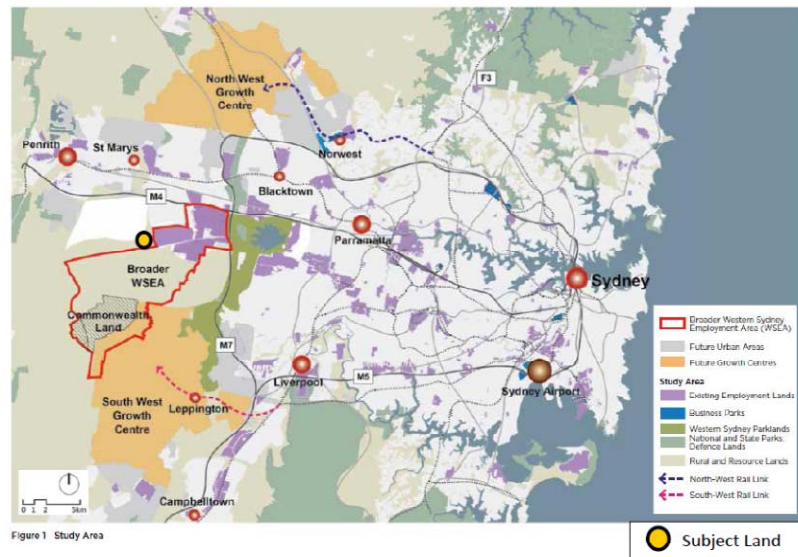
The following section considers the suitability of the *Subject Land* with reference to those same issues and opportunities with a brief commentary where relevant on each in the same order as the exhibited plan for ease of reference.

The exhibited plan included graphic representation of the issues and opportunities, accordingly the *Subject Land* has been added to the various figures of the exhibited plan, to demonstrate in a similar graphic communication the *Broader WSEA* remains a coherent plan with the inclusion of the *Subject Land*.

Executive Summary (page 2)

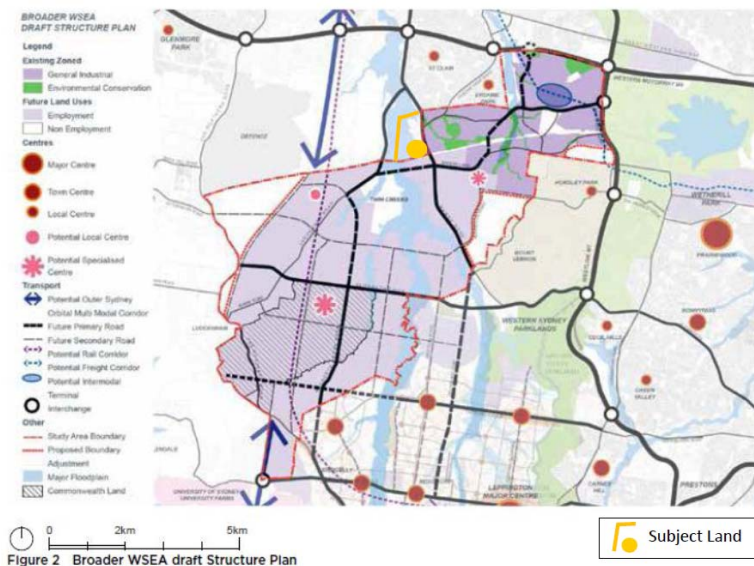
The *Subject Land* is added below to the two key plans of the exhibited *Broader WSEA*, which demonstrates the consistency of the inclusion of *Subject Land* to the objectives of the *Broader WSEA* and that the addition is a continuation of the planning intent of the *Existing WSEA* and the now *Broader WSEA*. The inclusion of the *Subject Land* does not compromise the intent of the Government for the overall planning of the Western Sydney Employment Lands.

Figure 1 : Study Area



The Broader WSEA (page 4 and 5)

Figure 2 : Broader WSEA draft Structure Plan

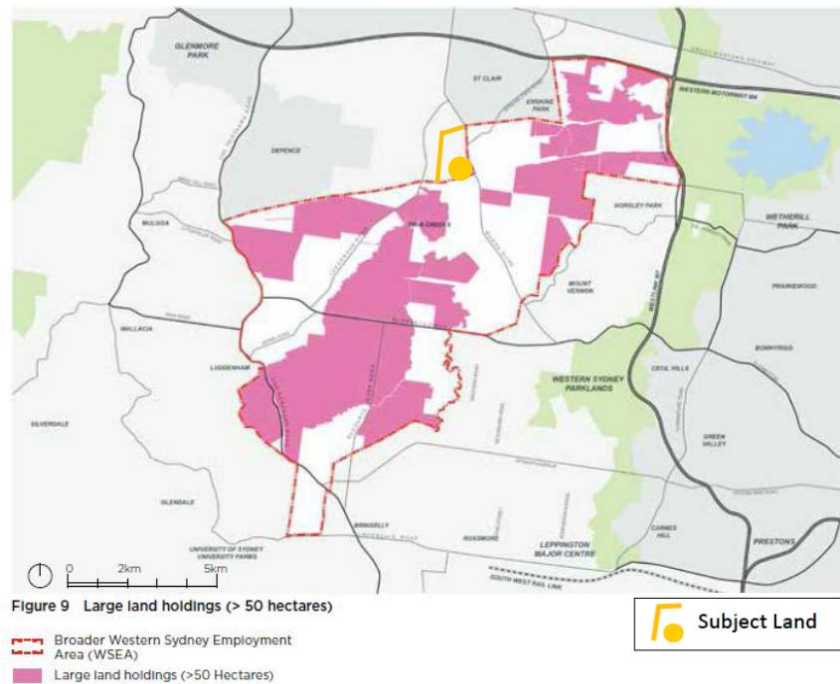


3. Broader WSEA and existing context

Study area land uses and activities (page 21)

A major consideration in the likelihood of the *Structure Plan* resulting in development for Employment purposes is the availability of large parcels of land so that large warehouse / distribution centres can be provided in the short-term to meet the competitive needs of Sydney against other capitals, without long protracted land consolidation negotiations. Although the initial Development Site of the *Subject Land* at 48 hectares, is just below the 50 hectare benchmark, it meets that criteria and particularly as it is very flat land and will not lose land area for land leveling, benching, etc.

Figure 9 : Large land holdings (> 50 hectares)



Appendix A includes an assessment report by Costin Roe of Site Conditions & Infrastructure Services, which address the issues of ; Services and utilities infrastructure

- Potable water
- Wastewater (sewer)
- Electricity
- Gas

In addition the following issues of; Biodiversity, Topography Waterway and flooding, and Riparian are also addressed in the assessment report by Costin Roe included in Appendix A

Figure 14 : Biodiversity

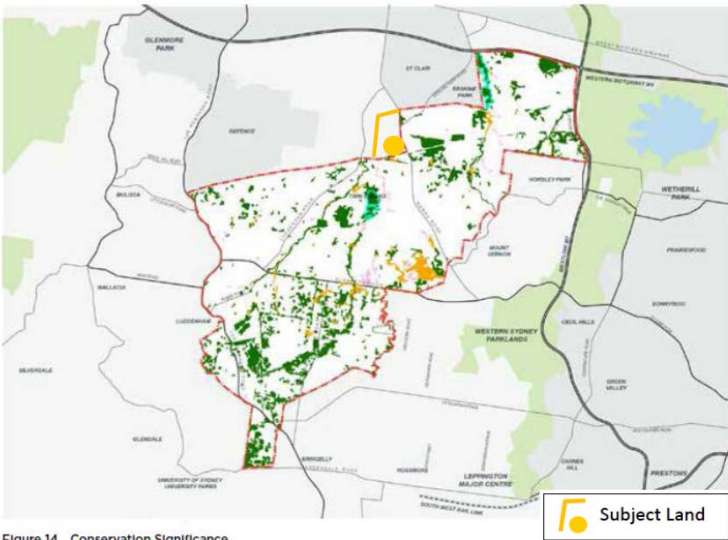


Figure 15 : Topography

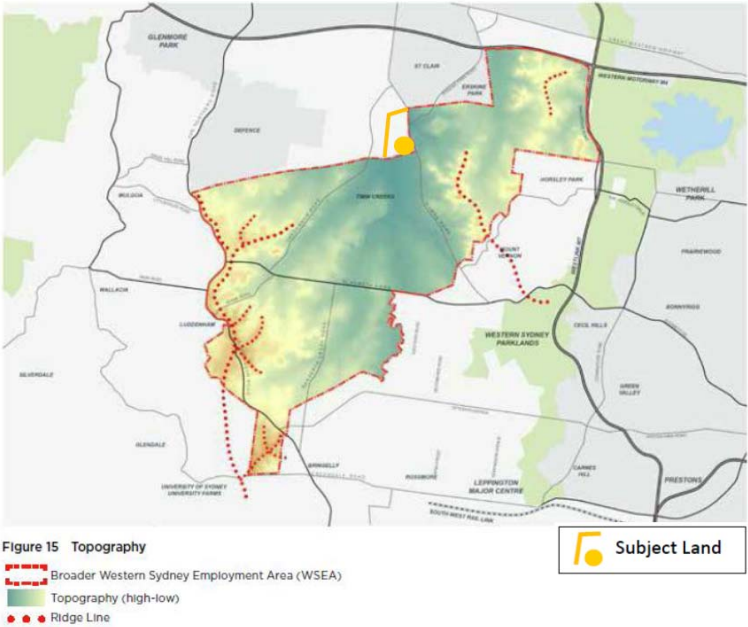


Figure 17 : Waterways and flooding

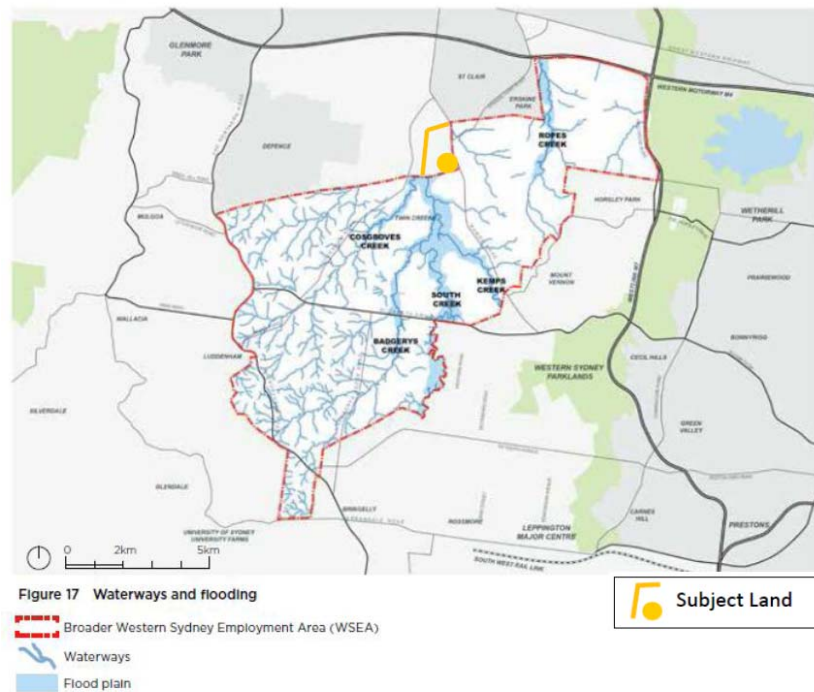
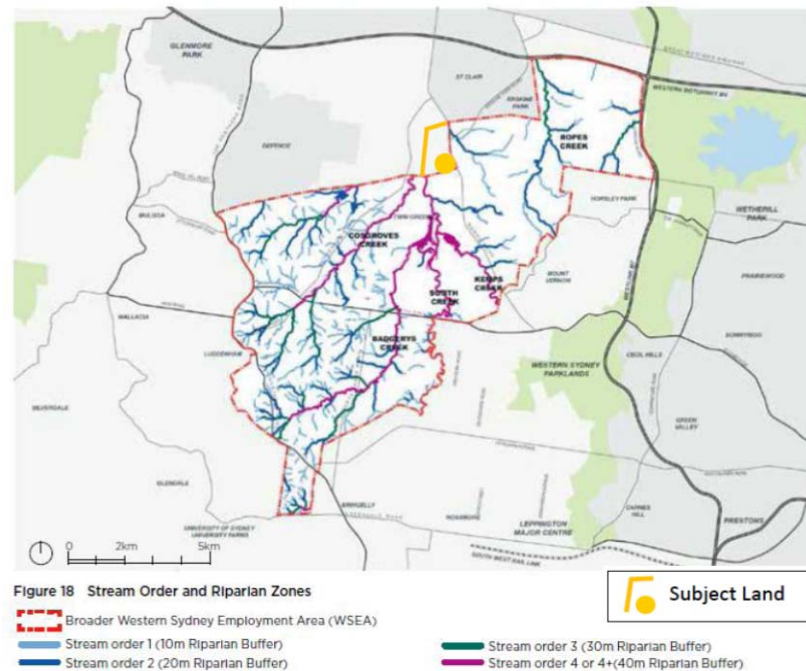


Figure : Riparian Assessment



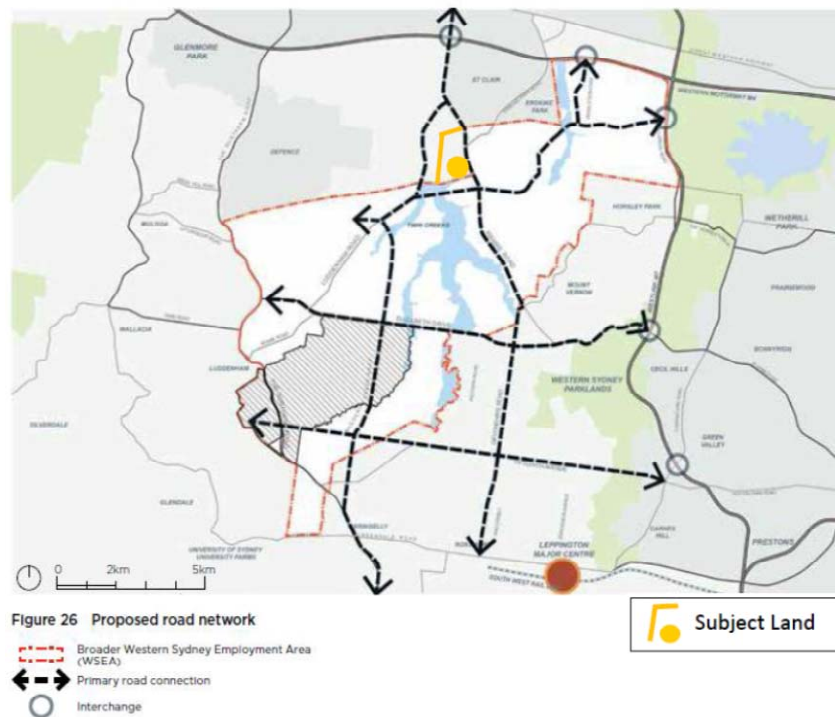
5. Draft Structure Plan

5.1 draft Structure Plan – key issues

- Economic drivers and land use
- Outer Sydney Orbital (OSO) corridor
- Road Network

Refer the detailed assessment of the Traffic – Road Access by TRAFFIX included in Appendix B. A summary of the conclusion of the investigation report is included in Section 3 above.

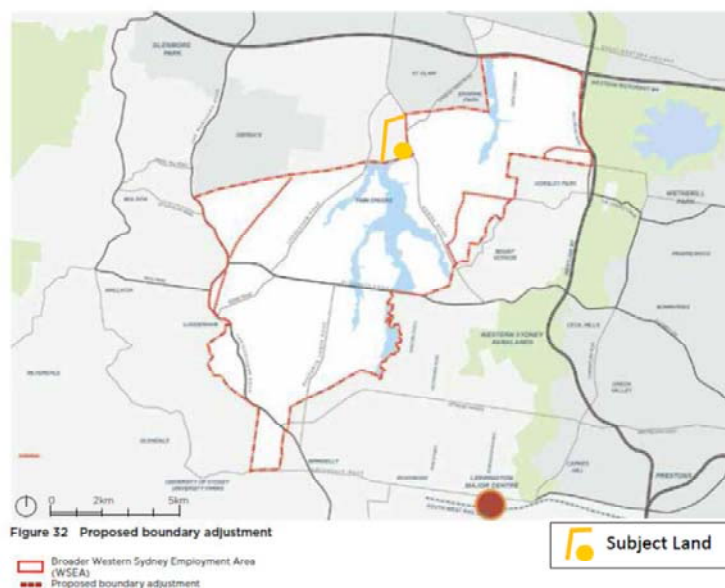
Figure 26 : **Proposed road network**



Boundary Adjustments

The exhibited plan has already accommodated boundary adjustments, similar to that proposed in the submission for the *Subject Land*.

Figure 32 : **Proposed boundary adjustment**



5.2 Staging

As demonstrated by the *Subject Land* being added to Figures 34 and 35 below, either staging scenario could proceed with the inclusion of the *Subject Land*.

Figure 34 : Single front staging scenario

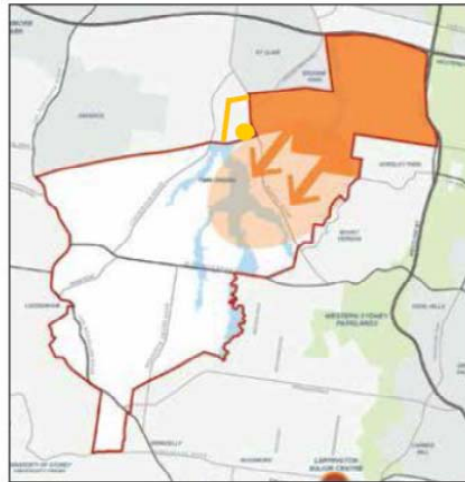


Figure 34 Single front staging scenario

Figure 35 : Two front staging scenario

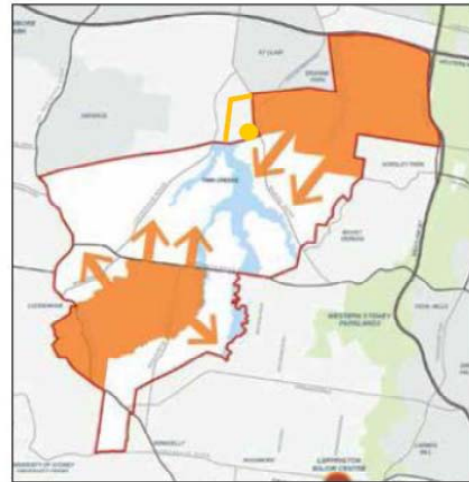


Figure 35 Two front staging scenario



5.3 Delivery mechanisms and Precincts

The Subject Land could readily be added to Precinct A as it would represent a logical extension of that precinct and importantly, make additional use of already installed and completed infrastructure.

Refer Figure 36 : **Broader WSEA Precincts** included below with the Subject Land marked, which demonstrates its logical addition to Precinct A.

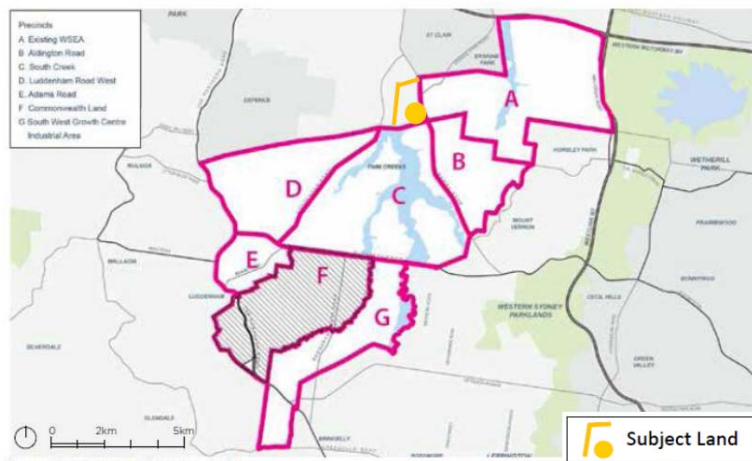


Figure 36 Broader WSEA Precincts

Precinct	Name	Employment Area	General Industrial (WSEA)	Environmental Conservation (WSEA)	Floodplain	Non Employment	Total
A	Existing WSEA		1,750	254	75	291	2,370
B	Aidington Road	493				377	870
C	South Creek	1,732			612	212	2,556
D	Luddenham Road West	823				588	1,411
E	Adams Road	407				66	473
F	Commonwealth land	1,674			20		1,694
G	South West Growth Centre Industrial	1,200			116		1,316
Grand Total		6,329	1,750	254	823	1,534	10,690

Table 4 Precinct Area Breakdown

5.4 Next steps

Adjusting the boundary of the *Structure Plan* to include the *Subject Land* will not interrupt the next steps in processing the *Broader WSEA Draft Structure Plan* described in Figure 3 on page 10 of the exhibited draft plan. The proponent can commence detailed Precinct Planning in early 2014 (or earlier) and would be funded by the proponent for the *Subject Land*.

5. Conclusion

In conclusion, the exhibited plan includes a precedent for boundary adjustment recognising a development plan of this scale will evolve in its detail as more investigation is undertaken.

The investigation reports undertaken to address the key issues requiring consideration for any land development (Section 3) and the assessment of the subject land against the same issues and opportunities that the exhibited plan was based on (Section 4), all prove up that the proposed inclusion of the Subject Land is prudent to make optimum use of already available infrastructure and will contribute to meeting the demand for *Employment Lands*.