

In reply please quote: 09/03146

Contact: Andrew Mooney on 9725 0214

16 September 2014

Mr Bruce Coleman
Director, Employment Precincts
Department of Planning and Environment
Level 5, 10 Valentine Avenue
PARRAMATTA NSW 2150

Dear Mr Coleman

**STATE ENVIRONMENTAL PLANNING POLICY - WESTERN SYDNEY
EMPLOYMENT AREA - PROPOSED EXTENSION OF BOUNDARIES**

Council at its meeting of 9 September 2014, considered a report on the proposed extension of boundaries for the Western Sydney Employment Area (WSEA). A number of issues and concerns were detailed in the Planning Report to Council and were subsequently endorsed by Council.

These issues and concerns are summarised below and form the basis of Council's submission to the Department of Planning and Environment (DP&E) on the proposed extension to the boundaries of the WSEA under the applicable State Environmental Planning Policy (SEPP). It should be noted that Council has previously raised similar concerns with the DP&E in a submission on the Broader WSEA draft Structure Plan in August 2013.

1. Transport Planning Issues

A transport structure plan needs to be implemented for the employment lands to address the required upgrades and maintenance of roads (including local roads) at no cost to Councils. As previously highlighted to the DP&E in Council's submission on the Broader WSEA draft Structure Plan, Council remains very concerned about the potential impacts of new employment lands on the surrounding road network including local roads in Council's ownership.

The extent and cost of the proposed upgrade to Elizabeth Drive and its interchange with the M7 Motorway and surrounding local roads is still yet to be detailed. The proposed \$200 million funding for local road improvements which will apply over a 10 year period is being made available to other Western Sydney Councils impacted by the traffic associated with Badgerys Creek and the new employment lands.

It is considered that this funding allocation will be inadequate to deliver the extent of local road improvements that may be required to service the existing and proposed employment lands as well as the proposed Badgerys Creek airport.

Council requests that both State and Federal Governments identify additional sources of funding to address the full scope of local road improvements required for the new airport and employment lands. If this funding does not occur, Council is concerned that it will ultimately lead to cost shifting to local Councils to fund essential local road improvements.

2. Land Use Planning Issues

Council's previous submission on the Broader WSEA draft Structure Plan indicated the need for further investigations to ensure that the visual and acoustic impacts from future employment lands on the adjoining rural-residential lands in Fairfield City are minimised. To date, these investigations do not appear to have been undertaken.

Council notes that under the Broader WSEA draft Structure Plan previously exhibited there was an area of land between the proposed employment lands and the existing rural-residential land located in Horsley Park and Cecil Park which was nominated as "non-employment lands". However, under the most recent proposed extension to the WSEA boundaries, this area appears to now be part of the proposed extension to the employment lands.

Although the proposed amendments to the SEPP (WSEA) do not indicate intended zoning of land, Council is extremely concerned that the land directly adjoining rural-residential lands in Horsley Park and Cecil Park which was previously intended for "non-employment lands", may in fact create an expectation in the community that the land will be zoned for future employment purposes.

Council requests that the DP&E clarify its intention with respect to "non-employment lands" adjoining the rural areas of Fairfield City and ensure that an appropriate buffer be provided between the future employment lands in Penrith City and rural-residential properties in Horsley Park and Cecil Park.

Further, Council requests that the DP&E to undertake detailed analysis and include measures that will minimise the scope for potential detrimental impacts from future employment development on the visual and acoustic amenity of residents living in Horsley Park and Cecil Park.

In light of the above concerns raised by Council, it is recommended that the DP&E undertake further detailed analysis in relation to the proposed amendments to the SEPP (WSEA). In particular Council considers it essential that a transport structure plan be developed which addresses the required upgrades and maintenance of the surrounding road network including adequate costing and funding of required infrastructure.

In addition, more detailed investigations are required into the potential impacts of rezoning land immediately adjoining the rural-residential areas in Horsley Park and Cecil Park, in particular measures to protect the visual and acoustic amenity of properties adjoining future employment lands.

Further to Council's request, it is noted that an additional community consultation meeting for residents of Horsley Park and Cecil Park will take place Wednesday 8 October at the Horsley Park Hall (allowing access outside of normal business hours), for stakeholders to view the plans and discuss the changes with staff from the DP&E. It is also noted that the Department has also agreed to extend the time in which stakeholders can make a submission on the proposal following the additional community meeting.

Thank you for taking the time to consider the concerns of Council. Should you have any questions in relation to the issues raised in this submission or wish to discuss these matters further, please do not hesitate to contact the undersigned on 9725 0214.

Yours sincerely,



Andrew Mooney
COORDINATOR STRATEGIC LAND USE PLANNING