

Our Ref: X13044
Your Ref: SEPP (Western Sydney Employment Area) 2009 - Transport and Arterial Road Infrastructure Plan Map
Contact: Peter Lee

1 December 2014

The Secretary
Department of Planning & Environment – Housing Growth & Economics
GPO Box 39
Sydney NSW 2001

Attention: Housing Growth & Economics

Dear Secretary,

Submission to Department of Planning & Environment - Amendment to SEPP (Western Sydney Employment Area) 2009 - Transport and Arterial Road Infrastructure Plan Map – Southern Link Road Network (SLRN)

I refer to the proposed amendment to the *State Environmental Planning Policy (SEPP) (Western Sydney Employment Area) 2009*, specifically the Transport and Arterial Road Infrastructure Plan Map. The amendments proposed affect the alignment of the Southern Link Road Network (an east-west link between Mamre Road and Wallgrove Road) and the Archold Road extension (connecting the Great Western Highway with the Erskine Park Link Road). The amendments to the Transport and Arterial Road Infrastructure Plan Map are on public exhibition and available for public comment.

This submission is made on behalf of the land owners, CSR Pty Limited, of no.327-335 Burley Road, Horsley Park (subject site). This site is affected by the proposed amendments to the Transport and Arterial Road Infrastructure Plan map, being considered in the Southern Link Road Network – Key aspects of north-south options refinement, as shown in Figure 1. Figure 1 is from the document 'Broader SWEA Southern Link Road Network (SLRN) – Options Refinement Final Report' prepared by AECOM dated 6 May 2014 which supported the proposed amendments. It is clear from Figure 1 that access requirements were identified and considered as part of the Options Refinement Report.

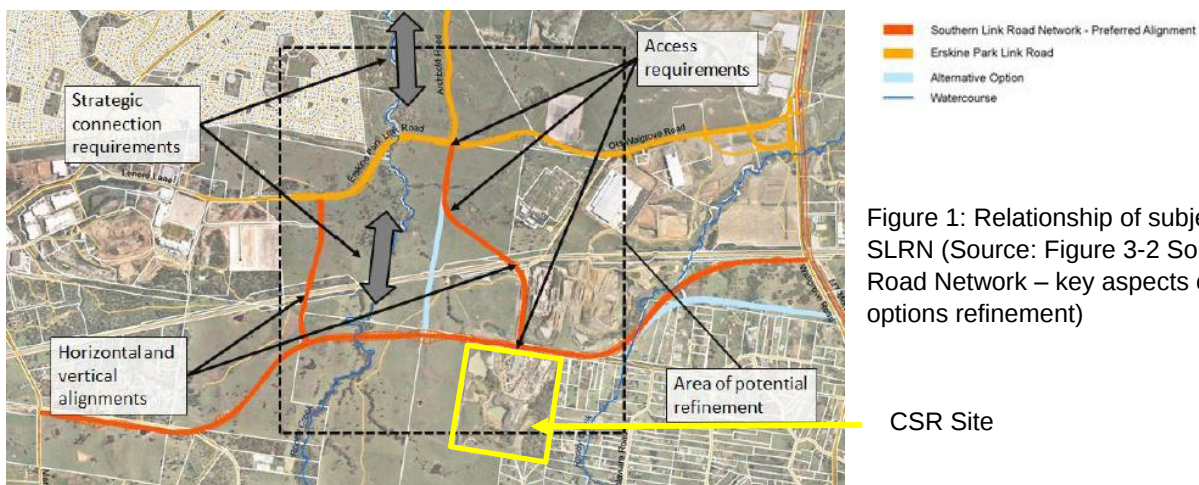


Figure 1: Relationship of subject site to SLRN (Source: Figure 3-2 Southern Link Road Network – key aspects of north-south options refinement)

CSR Site

It is understood that the proposed amendments include relocating key sections of the Southern Link Road Network to the north, with the majority of the road now within the future employment area. There are also some minor changes proposed

to the network as a result of the completion of the Erskine Park Link Road and the current Old Wallgrove Road upgrades. The amendments will support a good road network which will facilitate release of land for new employment areas south of the Warragamba Pipeline, Ropes Creek and Eastern Creek precincts of the Western Sydney Employment Area.

This submission supports the proposed amendments in principle however highlights several key issues with the proposal that should be carefully considered by the Department. This submission is based on information contained in the 'Broader SWEA SLRN – Options Refinement Final Report' which supported the proposed amendments. The three key issues raised in this submission include:

- Objecting to the Capitol Hill Drive extension due to the conflict of industrial traffic using this route through rural residential areas and vice versa, the residential traffic utilising the extension and driving through industrial areas.
- Objecting to a control in relation to intersection concept design - local access intersections – seeking temporary access.
- Objecting to the proposed batters from the EW SLRN Connection/Eastern NS SLRN Connection intersection concept design and the adverse impacts on the CSR site.

The above key issues will now be addressed in further detail.

1. Capitol Hill Drive Extension

The Options Refinement Report was informed by several sources including the Broader Western Sydney Employment Area (BWSEA) draft structure Plan. The BWSEA included Capitol Hill Drive extension, as shown in Figure 2 being an excerpt of the BWSEA Exhibited Draft Structure Plan – proposed road network. Future connections include EW SLRN Connection/ Eastern NS SLRN Connection intersection would include as south arm providing local access to the CSR site and potentially an onward connection to the Capitol Hill Drive extension south of the SLRN.

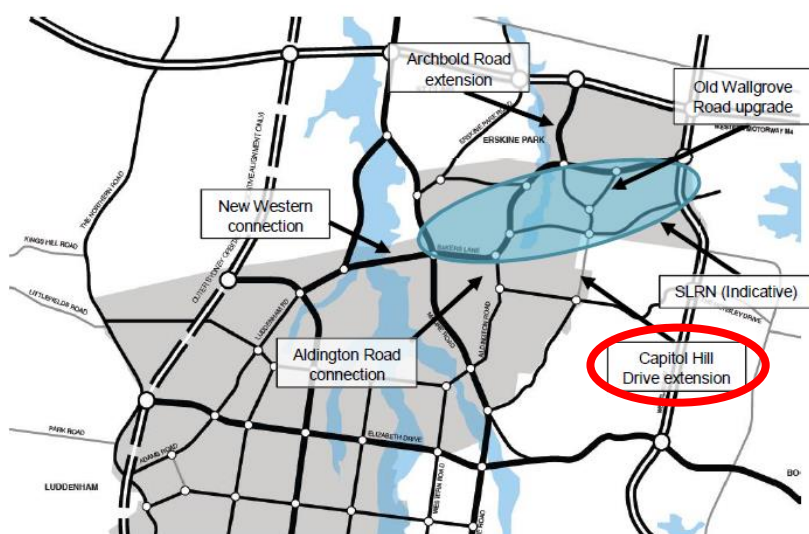


Figure 2: Location of proposed Capitol Hill Drive extension (Source: Figure 3-4 BSEA Structure Plan proposed road network, Broader WSEA SLRN – Options refinement)

The proposed Capitol Hill Drive extension, as shown above, is not supported for two reasons. Firstly, this extension will be a sub-arterial connection and will connect industrial areas with rural/residential areas ultimately linking into the road network further south. This extension will offer another route for industrial vehicles to use however this is through existing rural/residential land. The extension would encourage industrial traffic to utilise this road but also rural/residential traffic. This becomes an issue of safety as rural/residential and industrial traffic should be separated where practical.

Secondly, CSR Pty Limited currently have a development application (DA 893.1/2013) for the subject site under assessment by Fairfield Council for an industrial subdivision. The Capitol Hill Drive extension is proposed south through the site therefore requiring redesign of the development of the Site.

2. Intersection concept design - local access intersections

The second objection is specifically related to the development of the site, relating to the access requirements identified in Figure 1 for the CSR site. The access requirement for the CSR site is shown in Figure 3, being the 4th leg in the proposed SLRN/Mamre Road intersection.



Proposed SLRN/ Mamre Road intersection

Figure 3: Proposed 4th leg for site access to the CSR site in the SLRN/ Mamre Road intersection (Source: Broader WSEA SLRN – Options refinement, Figure 4-7 Proposed future connections)

This submission objects to the control stating that 400-500m is required between intersections including a local access intersection (Clause 4.3.2 Local access intersection). This clause states that the SLRN will include consolidated signalised intersections between arterial road intersections to provide access to and from local developments as shown in Figure 4.

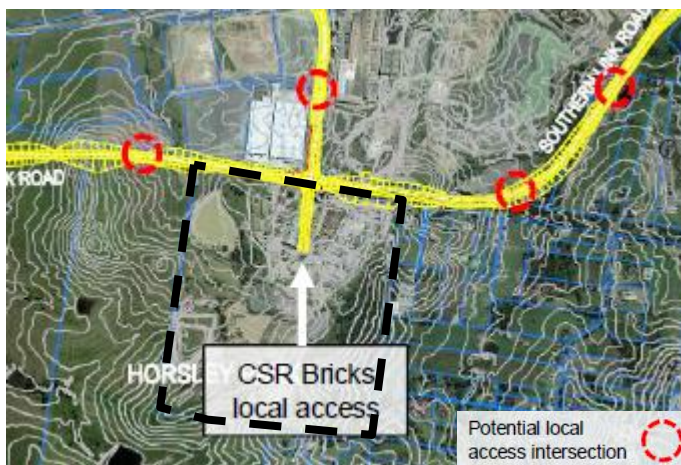


Figure 4: Potential local access intersections with the SLRN (Source: Figure 4-14 Potential locations of local access intersections SLRN – Options Refinement Report)

The SLRN – Options Refinement Report states under Clause 4.3.2 Local access intersections that “*spacing of approximately 400-500m between intersections is proposed to balance access to developments with the overall permeability of the SLRN. Figure 4 [excerpt of SLRN – Options Refinement Report (Figure 4-14)] indicates the proposed locations of local access intersections based on the preferred spacing and known opportunities and constraints in the area*”.

CSR have no objections to the 4th leg of the Southern Link Road intersection design providing local access to the CSR site however the 4th leg is situated over the existing brickpit. The proposed subdivision application (DA 893.1/2013) is a three staged subdivision application to progressively fill the site and facilitate the development of Stages 1 and 2 for industrial purposes while permitting the continued operation of the brick factory until such time as CSR decide to cease operation and develop the land in Stage 3. An excerpt of the subdivision plan is shown in Figure 5.

Temporary intersection

Location of 4th leg of SLRN/Mamre Road intersection

Stage 3 containing the brick factory

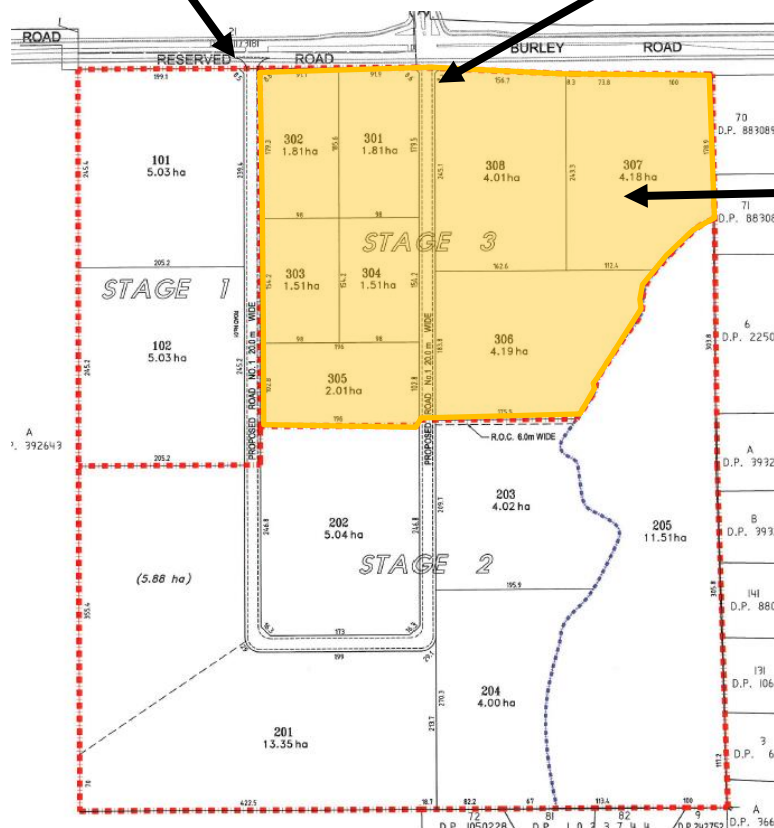


Figure 5: Submitted subdivision plan (DA 893.1/2013)

As shown in Figure 5, the 4th leg of the SLRN/Mamre Road intersection will be within Stage 3 of the proposed development which will not be constructed until such time as CSR decide to cease the operation of the brick making factory being in some 10 years. As such, an intersection is required to service Stages 1 and 2 of the proposed industrial development. In accordance with Figure 4 Potential local access intersections with the SLRN, CSR's property does not contain an indicative local access point. In order to service Stages 1 and 2 a temporary access road is proposed approximately 200m from the intersection as shown in Figure 5.

Consequently, this submission is objecting to Clause 4.3.2 local access intersection spacing requirements of between 400m and 500m from intersections. It is suggested that the temporary intersection could ultimately become a left in/left out access arrangement pending the construction of the 4th leg of the SLRN/Mamre Road intersection providing access into the CSR site.

3. Proposed batters from the EW SLRN Connection/Eastern NS SLRN Connection intersection concept design

The final objection concerns the proposed EW SLRN connection/ eastern NS SLRN connection intersection concept design which identified significant batters into mounds forming a barrier to CSR's brick factory. These mounds are to remain in place throughout the operation of the brick pit with the proposed batters shown in Figure 6 (on the following page) of the SLRN report requiring a significant portion of the mounds to be removed. As such, this submission requests that retaining walls are constructed instead of the batters to ensure that the mounds are retained while the brick factory is in operation. The retaining walls are to be at the full cost of the RMS and not CSR.



Proposed batters requiring a significant portion of the mounds to be removed

Figure 6: Proposed EW SLRN Connection/Eastern NS SLRN Connection intersection concept design
(Source: excerpt from Broader WSEA SLRN Options Refinement Final Report)

In conclusion, this submission supports the amendments to the *State Environmental Planning Policy (SEPP) (Western Sydney Employment Area) 2009*, specifically the Transport and Arterial Road Infrastructure Plan Map, in principle however raises three key issues that the Department of Planning & Environment should strongly consider:

- Removing the Capitol Hill Drive extension due to potential conflict of industrial traffic using this route through rural residential areas and vice versa, the residential traffic utilising the extension and driving through industrial areas.
- Permitting flexibility within the local access intersections spacing requirements to permit a temporary access arrangement to service Stages 1 and 2 of the proposed industrial subdivision for CSR's site until such time as the 4th leg of the SLRN/ Mamre Road intersection can be constructed and this access arrangement become a left in/left out arrangement only.
- Amend the engineering design for the EW SLRN Connection/ Eastern NSW SLRN Connection intersection where significant batters are proposed into mounds on CSR's site and replace with retaining walls at RMS's cost so as to ensure that the mounds remain for the duration of the brick factory operation.

Should you have any questions, please don't hesitate to contact me on 8808 5000.

Yours Faithfully
Calibre Consulting (NSW) Pty Ltd

Peter Lee
Manager - Planning

COPIES

1. Wayne Pasalich CSR Pty Limited