



Our ref: 14227

27 November 2014

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Att: Mr Bruce Colman (Director, Employment Land Release)

By Email: information@planning.nsw.gov.au

**RE: REFINEMENT OF SOUTHERN LINK ROAD NETWORK &
ARCHIBOLD ROAD ALIGNMENTS**

We act on behalf of the Sydney Anglican Schools Corporation (SASC) in regard to Mamre Anglican School located on Bakers Lane immediately adjacent to the proposed new alignment to the Southern Link Road within the proposed Western Sydney Employment Area Extension.

In addition to Mamre Anglican School there are a number of other well established sensitive land uses that utilise Bakers Lane for access including Trinity Catholic Primary School, Emmaus Catholic Secondary School, Emmaus Retirement Village.

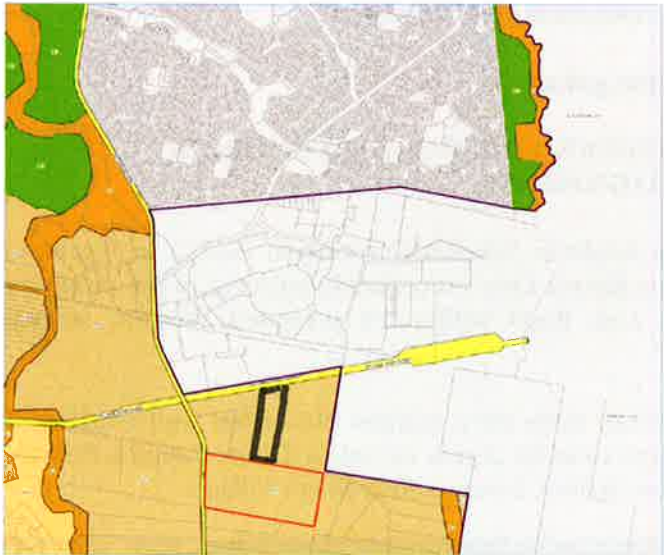
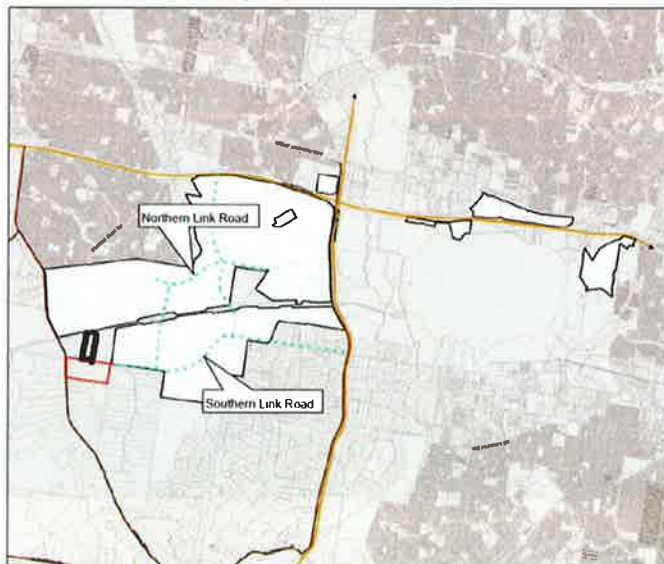


Figure 1 – Location of Mamre Anglican College and Bakers Lane

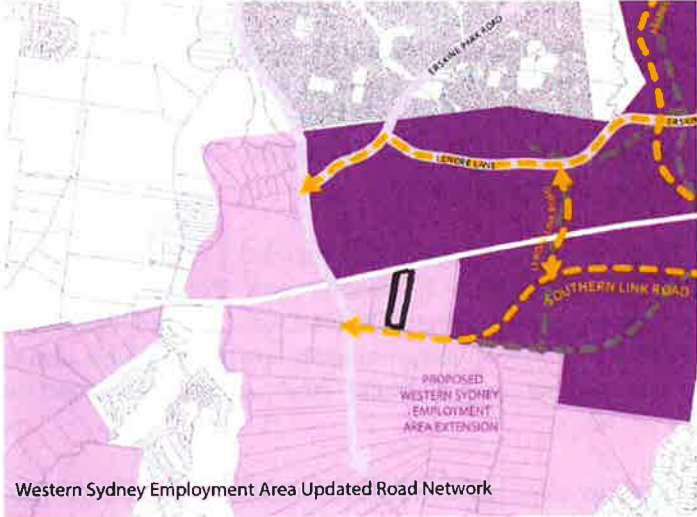
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We are writing this submission as an objection to the proposed alignment of the Southern Link Road (along Bakers Lane) prior to any formal exhibition or adoption of rezoning of land under the proposed Western Sydney Employment Area Extension.

Existing Statutory Legislation

Zoning of Land  LOGOS Estate Western Sydney Employment Area (approx.)	Comment: The subject land is currently zoned RU2 Rural Landscape under the provisions of Penrith LEP 2010. The site has historically been zoned for rural based land uses as discussed in the following section of the report. The zoning map indicates the adjoining “LOGOS Estate” subject of a previous Part 3A application for industrial development that was refused by Dep. of Planning.
Western Sydney Employment Land and Roads  LOGOS Estate Proposed Roads	Comment: The adjoining land to the east of the site is zoned IN1 Industrial under the provisions of SEPP (Western Sydney Employment Area) 2009. This SEPP sets out the broad statutory framework for the employment lands of western Sydney and included a road network including a Northern and Southern Link Road. Note: The Southern Link Road never extended to Mare Road via Bakes Lane in the current legislation.

The Proposed Alignment of the Southern Link Road

Proposed Southern Link Road Alignment  (Full version attached at Appendix A)	Comment: The proposed Southern Link Road alignment extends the road corridor along the alignment of Bakers Lane to Mamre Road prior to any formal exhibition or adoption of land use under the proposed Western Sydney Employment Area Extension. The proposed road corridor pre-empts the statutory rezoning of land and should not be identified without a full and proper analysis of land use conflicts and solutions to accommodate traffic conflict with sensitive existing land uses.
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Grounds for Objection

One of the fundamental principles of strategic land use planning is to avoid unnecessary conflicts of land use particularly between sensitive land uses such as schools and retirement villages with industrial land uses.

Schools and retirement villages have been located along Bakers Lane, Kemps Creek since the 1980's. Historically, the subject site and adjoining sensitive land uses have been identified within the 1991 South Creek Valley Regional Environmental Study and draft Regional Environmental Plan as being located within a future Living Area with surrounding dwelling densities of around 10 dwellings/hectare.

The existing land has been zoned Rural under the provisions of Penrith local planning instruments since the 1980's. This rural land use has recently been reinstated for the land through the detailed Penrith Rural Land Study and subsequent preparation and gazettal of the Penrith Local Environmental Plan 2010 which has only this year seen the land zoned RU2 Rural Landscape.

While the land has been earmarked within the proposed Western Sydney Employment Area extension there has been no formal rezoning process commenced on the land in question and no opportunity for landowners and government to fully consider land use implications of the proposed Southern Link Road alignment.



Bakers Lane will be utilised for the pick up and drop off of 1,800 students and 180 staff and visitors attending 3 schools as well as retirement living traffic.

It is clearly inappropriate for a major collector road for a wide scale range of industrial and employment land uses to be sharing access and frontage with sensitive land uses such as 3 schools (Mamre Anglican College, Trinity Primary School and Emmaus Catholic College) and a retirement village. This type of conflict of land use is not evident anywhere else in metropolitan Sydney

As referred to previously, this land use conflict issue was identified by the Department of Planning in a previous Part 3A application to rezone and development land immediately opposite the subject land (known as the LOGOS Estate). The Department of Planning at the time issued Director General's Requirements which identified one of the key issues to consider in the project was strategic land use planning and in particular:

"identify the potential land use conflicts associated with the development of the project, particularly in relation to its potential impacts on any sensitive land uses in the adjoining area (such as the school and retirement village opposite the site), and describe what measures would be implemented to avoid and/or minimise these potential conflicts."

Despite this key issue identified within the Director General Requirements the environmental assessment prepared by Phillip Jones Environmental Planning dated 29 September 2010 for LOGOS Property made no specific consideration of the adjoining sensitive land uses and the project made little attempt to avoid a clear conflict in land uses in this locality.

The proposed Part 3A LOGOS Estate project was refused in June 2012.

It is considered that the proposed realignment of the Southern Link Road along Bakers Lane for the Western Sydney Employment Lands should not proceed without proper stakeholder consultations between sensitive established land uses and the government with the view of providing certainty over clear land use conflict issues.

It is considered that the upgrade of Bakers Lane as an integral part of the operation of this major redevelopment of employment land is a core issue in terms of the impact of the ultimate development on surrounding existing land uses.

No approval should be granted for this major change of land use without a full understanding of design and traffic modelling of intersection performance and surrounding existing and future land uses.



The schools have operated for up to 20 years without unreasonable and inappropriate impacts on the movement of school traffic.

It is considered that a “safe and efficient” solution to land use conflict must be resolved prior to the identification on a realignment major freight transport route. No heavy vehicle access route should be proposed without a proposal to deal with this sensitive land use conflict. A solution must identify land that will be required for any extension and how any road upgrades along with amended roadworks will be funded.

CONCLUSION

It is our opinion that the proposed extension and re-alignment of the Southern Link Road along Baker Lane is inappropriate. The proposal pre-empts the strategic planning that is to be undertaken for the proposed extension to the Western Sydney Employment Area.

The proposal is inconsistent with sound planning principles of separating conflicting land uses and has made little attempt to demonstrate a full and proper consideration of this issue as part of the proposal.

There has been no stakeholder consultation with the established sensitive land uses that will be affected. There has been no consideration of alternate opportunities or design even though earlier advice from the Department of Planning identified concerns in respect to this land use conflict.

In view of the above, we formally and strongly object to this proposal. We request a meeting between representatives of the Department of Planning and sensitive landowners in this precinct to discuss this matter prior to any further consideration.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R. A. Dwyer', written over a faint circular stamp.

INGHAM PLANNING PTY LTD



APPENDIX A

Western Sydney Employment Area Updated Road Network

