



18<sup>th</sup> December 2014

Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Corrected version

Dear Sir/Madam:

***Re: Draft Leppington Precinct Plan - Submission***

I write to you on behalf of the Scenic Hills Association in relation to the *Draft Leppington Precinct Plan* (the Precinct Plan) and in particular the surprise inclusion of St Andrews Road as a four lane sub-arterial road connecting Camden Valley Way to the F5 and Campbelltown Road, as outlined in the *Leppington Precinct – Transport and Access Strategy (Transport Strategy)*.

Currently St Andrews Road is intersected by the Upper Canal and cannot be accessed past this point from Camden Valley Way. We had understood that the western side adjoining Camden Valley Way would be upgraded to accommodate the greenfield developments that the NSW Government and Camden Council have unfortunately allowed to proliferate along Camden Valley Way that were never part of the original South West Growth Centre. However we have been constantly assured by the Growth Centres Commission and the RMS that the eastern side of the Upper Canal would not be touched.

St Andrews Road east of the Upper Canal to the F5 is a rural road that transverses important remnant stands of critically endangered Cumberland Plain Woodland that is part of a wildlife corridor. It is also lined with sensitive land uses including two schools requiring 40 km zoning during school peak arrivals and departures (Mount Carmel High School and a school being built by the Serbian Orthodox Diocese), two Carmelite Monasteries, a Carmelite Retreat Centre and the last intact 19<sup>th</sup> century rural estate (1810) in the Campbelltown area that until now has been protected by its location within Campbelltown's Scenic Hills Environmental Protection Area and supported by the NSW Heritage Council over several decades.

As such St Andrews Road has never been scheduled for upgrade opening it up across the Upper Canal to connect Camden Valley Way to Campbelltown Road and the F5 as part of the South West Growth Centre. Its sudden appearance in the Precinct Plan is therefore a surprise to us and also, apparently, to Campbelltown City Council according to a report that went to Campbelltown Council at its meeting of the 9<sup>th</sup> December 2014. St Andrews Road is NOT included in the *South West Growth Centre Structure Plan, 2010*; the Growth Centres Commission and its subsequent incarnation within the Department of Planning has (until now) told us that it has consistently rejected approaches from developers to include

it; and recent discussions in July this year with senior staff from Roads and Maritime Services (RMS) confirmed that it had no intention of opening up St Andrews Road across the canal either.

One would have expected that a major variation to the *South West Growth Centre Structure Plan* such as this would have warranted an explanation, yet it is disturbing to note that there is no discussion of this in the Precinct Plan.

We are aware that land developers and speculators who have acquired land in Campbelltown's Scenic Hills Protection Area (on the eastern side of the Upper Canal) have been lobbying over many years to open up St Andrews Road and/or connect it to the F5 in order, apparently, to facilitate the rezoning of the Scenic Hills Protection Area for development. These reports have come not only from the Growth Centres Commission but also from senior staff of the Roads and Traffic Authority (now Roads and Maritime Services), the latter in relation to a proposed major truck stop on the F5 in 2010. The proposals were consistently rejected on a variety of grounds.

The reasons for NOT upgrading and opening up St Andrews Road across the Upper Canal and for NOT providing an interchange at the F5 have not changed since we last spoke to the Growth Centres Commission or the RMS, as follows:

1. The F5 is a federally funded road connecting Sydney to Melbourne and Canberra. An interchange at St Andrews Road would disrupt traffic flow given its close proximity to interchanges at Raby Road to its south and Campbelltown Road (Denham Court) to its north.
2. In 2010, a proposal by the RMS to put a major truck rest area at Varroville adjoining St Andrews Road on the F5 was cancelled by the NSW Minister for Roads, David Borger, following representations from Campbelltown City Council and the community concerning safety and traffic flow (noting its close proximity to other interchanges and the volume of traffic in peak hours) and its potential impact on the adjoining Scenic Hills Environmental Protection Area.
3. The Growth Centres Commission told us (in 2007, reconfirmed in 2013) that it had frequently been approached by developers to divert funding from other roads in the *South West Growth Centre Structure Plan* to St Andrews Road and that it had consistently rejected these requests on environmental grounds and its consequent costs.
4. Sensitive land uses along this road would be adversely impacted with potentially devastating effects: two Carmelite monasteries, the Carmelite Retreat Centre, two schools (restricting traffic flow during peak periods), an important wildlife corridor of critically endangered Cumberland Plain Woodland, and the core of the 1810 Varro Ville estate of 288 acres adjoining St Andrews Road, which was classified by the National Trust of NSW in 1976 (268 acres) and recently recommended for an Interim Heritage Order by the NSW Heritage Council (26<sup>th</sup> August 2014).
5. By compromising existing compatible land uses in the Scenic Hills Protection Area and opening up further access it would increase the likely loss of the Scenic Hills to inappropriate and unwanted development. The Scenic Hills have been fiercely protected by the local community of

Campbelltown and its successive councils since at least 1945. The preservation of the Hills and its heritage has had planning support since its inclusion in *The New Cities of Campbelltown, Camden, Appin Structure Plan* (State Planning Authority of New South Wales 1973). This planning support was reconfirmed recently by two studies commissioned by Campbelltown City Council as input to its Draft Local Environment Plan 2014<sup>1</sup>.

### **St Andrews Road – arterial or sub-arterial road?**

Of further concern is the lack of clarity in the Transport Strategy regarding the classification and role of St Andrews Road and the lack of consultation and agreement for the strategy that this derives from. While this public exhibition seeks to consult on the Leppington Precinct where St Andrews Road is listed as a ‘sub-arterial’ road within the Precinct, careful reading shows that its inclusion derives from the RMS’s *Draft South West Growth Centre Road Network Strategy (Roads and Maritime Services, June 2011)* covering the South West Growth Centre as a whole where it is unclear from the description whether it is a ‘sub-arterial’ or an ‘arterial’ road linking The Northern Road further west of Leppington with the F5 and Campbelltown Road, as follows:

*‘According to the Draft Roads and Maritime Road Network Strategy...St Andrews Road is currently a rural access road to the southeast of the precinct that would in future provide the major east/west arterial connection within the Leppington Precinct and link to the F5 and Campbelltown Road (to the east) and The Northern Road (to the west). (Leppington Precinct – Transport and Access Strategy, p. 13).*

There does not appear to have been any consultation on this ‘Draft’ plan (which is referenced under different names in the Transport Strategy) and, and it is deeply concerning that its partial inclusion in the Leppington Precinct Plan would give it statutory effect while the Draft plan it derives from remains apparently unagreed and, notably, completely at odds with the *South West Growth Centre Structure Plan, 2010*. We are deeply concerned too that its inclusion seems to be a revival of a planned expansion of St Andrews Road that was originally part of *The New Cities of Campbelltown, Camden, Appin Structure Plan* (State Planning Authority of New South Wales 1973) which the Growth Centres Commission told us (in 2007, reconfirmed in 2013) was abandoned with the planning for the South West Growth Centre. A search under the *Government Information (Public Access) Act 2009* last year indicated that the NSW Department of Planning and Infrastructure was still working on the latter assumption in mid-2013 when it declared that the land it owned as part of the Minto Special Uses Corridor between the St Andrews Road and the F5 road corridor was ‘no longer needed for its planning purpose’ (PMIN13/347/6). A further concern is that Campbelltown Road on the eastern end of St Andrews Road no longer operates efficiently as part of this network since it cannot now be accessed directly by cars driving north from Campbelltown. Traffic is directed instead onto Raby Road and the F5. Clearly this larger network, particularly as it operates within the Campbelltown Local Government Area has not been thought through and there has been inadequate (if any) communication and consultation with the relevant government agencies and councils.

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<sup>1</sup> *Visual and Landscape analysis of Campbelltown’s Scenic Hills and East Edge Scenic Protection Lands, Final Report*, prepared for Campbelltown City Council by Paul Davies Pty Ltd and Geoffrey Britton, March 2010, and *Campbelltown Local Government Area Heritage Review*, prepared for Campbelltown City Council by Paul Davies Pty Ltd, April 2011.

## **In Conclusion**

We object strongly to the inclusion in the Precinct Plan of St Andrews Road as an expanded sub-arterial road connecting Camden Valley Way to Campbelltown Road and the F5, to any opening up of St Andrews Road across the Upper Canal (in any form) and to any interchange on the F5 connecting St Andrews Road to it.

We also object to the way in which this has suddenly 'appeared' in the Precinct Plan without explanation and without specific consultation, given the quantity of its impact on the planning for the Campbelltown Local Government Area and the sub region as a whole. Such an inclusion does little to assist in building community confidence in the planning process at the state level or alleviating concerns about the developer-driven nature of the current planning process that benefits certain vested interests at the expense of communities and good strategic planning outcomes. We request that any planning within the Leppington Precinct that depends on the St Andrews Road expansion over the Upper Canal be put on hold subject to a full public and agency consultation on the broader Draft RMS Road Network Strategy for the South West Growth Centre and its role within a revised Structure Plan, which should include greater consideration of public transport options recently mooted for this area.

Yours sincerely



Jacqui Kirkby  
Scenic Hills Association