

Our ref: 17245

19 December 2017

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Att: Kelly McNicol (Team Leader Industry Assessments)

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

**RE: OAKDALE WEST INDUSTRIAL ESTATE, KEMPS CREEK
(SSD 7348)**

We act on behalf of the The 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 School, Bakers Lane (Source: Google Maps)

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We are writing this submission as an objection to the State significant development application for the proposed Oakdale West Industrial Estate, Kemps Creek (SSD 7348). The proposed large scale industrial development is located to the east of the subject land adjoining Emmaus Catholic College which is the neighbour to Mamre Anglican School (see **Figure 2 and 3**)



Figure 2 Proposed Oakdale West Industrial Estate (Source: EIS Figure 1)



Figure 3 Oakdale West Industrial Estate Proposal (EIS

Oakdale West Industrial Estate is located within the area identified as the Western Sydney Employment Area (WSEA) as indicated in the extract from the Draft Structure Plan below.

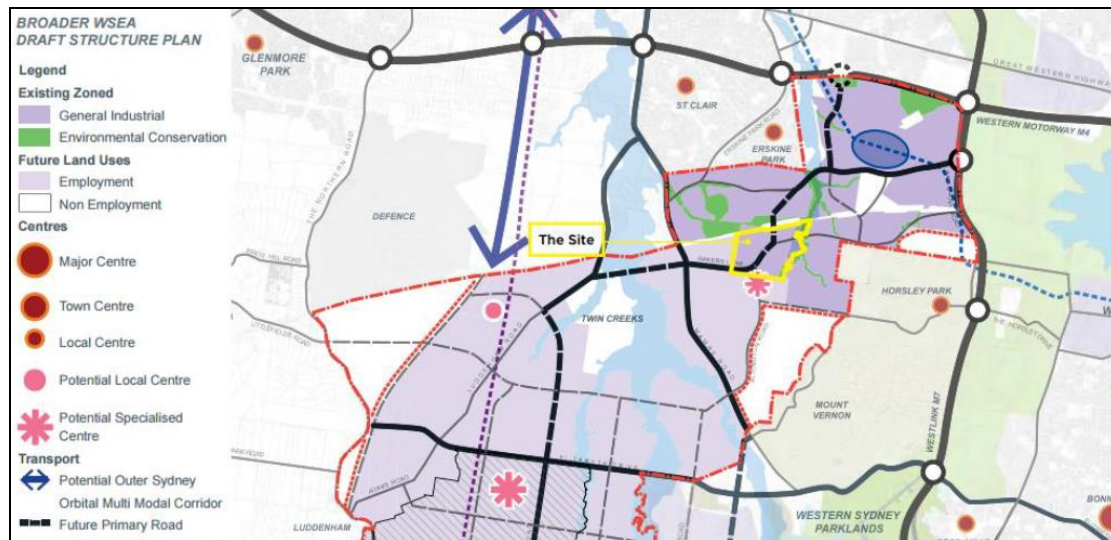


Figure 4 Draft WSEA (Source: EIS Figure 2)

A new regional road network is intended to serve the broader area as indicated in Figure 4 and 5. The location of the Oakdale West Industrial Estate within the planned regional road network is illustrated below (see Figure 5)

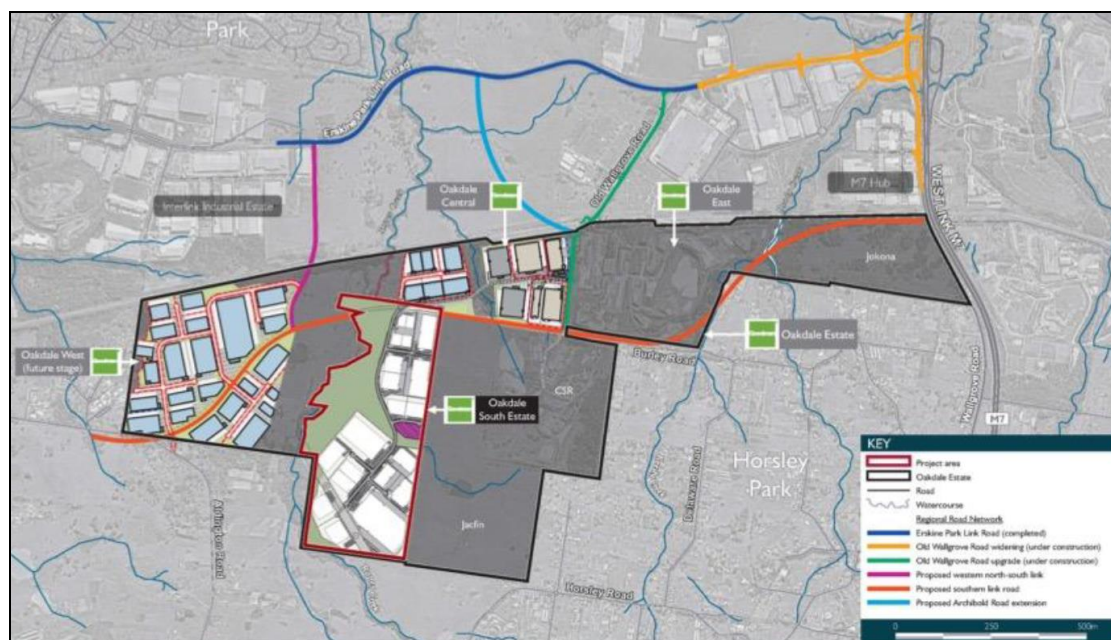
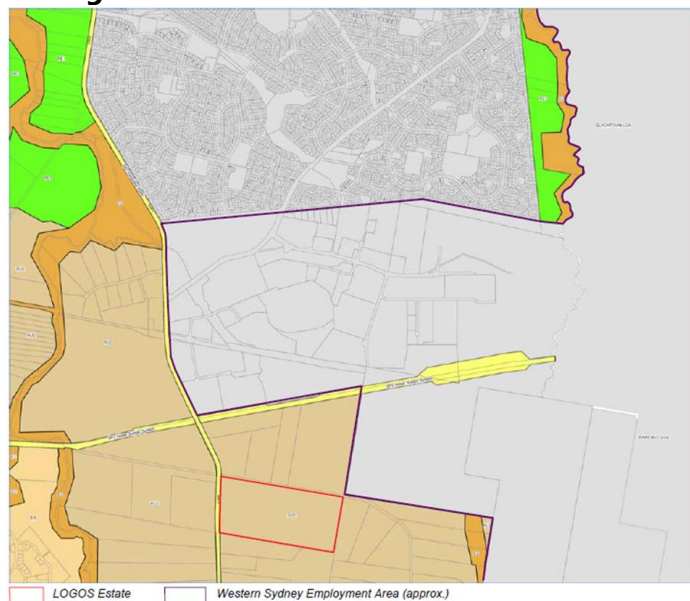


Figure 5 Integrated and Regional Road Network (SOURCE: EIS Figure 7)

Existing Statutory Legislation

Zoning of Land

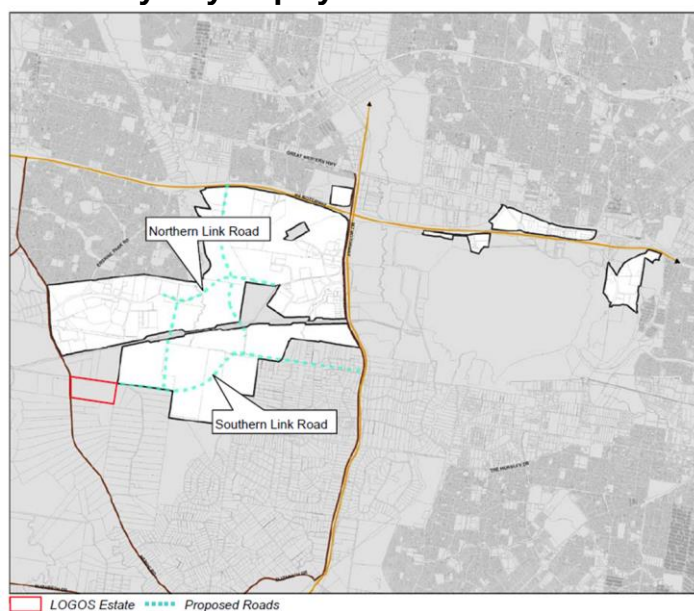


Comment:

The school owned land (Mamre Anglican School) 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 DOP&E.

Western Sydney Employment Land and Roads



Comment:

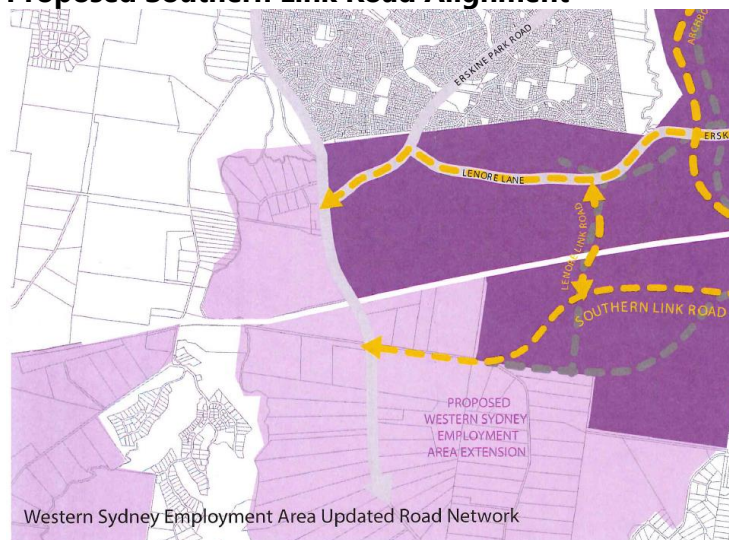
The subject land (Oakdale West Industrial Estate) to the east of the site is zoned IN1 Industrial under the provisions of SEPP (Western Sydney Employment Area) 2009.

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 Mamre Road via Bakes Lane in the current legislation.

The Proposed Alignment of the Southern Link Road

Proposed Southern Link Road Alignment

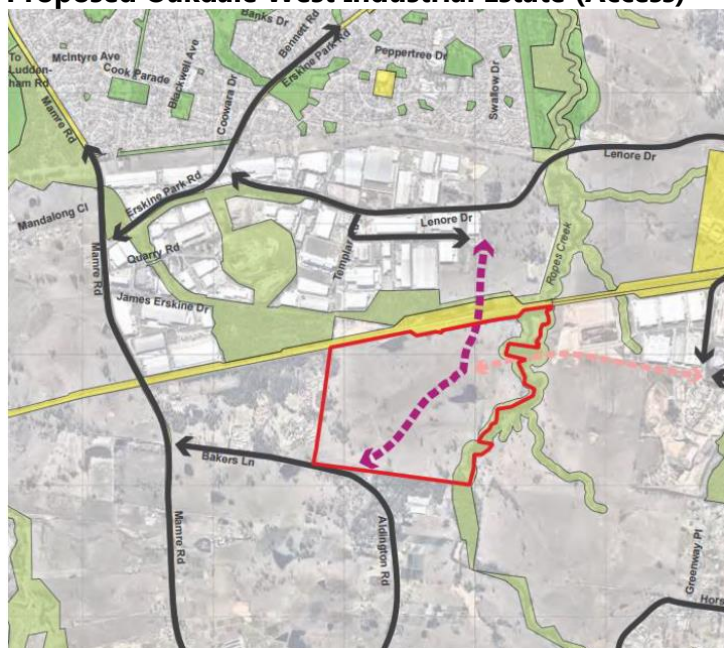


Comment:

The proposed Southern Link Road alignment extends the road corridor along the alignment of Bakers Lane to Mamre Road.

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.

Proposed Oakdale West Industrial Estate (Access)



Comment:

The proposed development includes the construction of a new road to form part of the Western Sydney Employment Area road network, connecting the Oakdale West Estate to Lenora Drive. The access is proposed to connect to the existing Bakers lane. There are no details provided in regard to the proposed Southern Link Road extension to Mamre Road with the application.



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 School, 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.”

In regard to the current application, the Secretary’s Environmental Assessment Requirements (SEARS) issued to the Oakdale West Industrial Estate in November 2015 required details of

- plans of any road upgrades or new roads required for the development;
- a discussion of any interactions between the proposed local internal roads and the preferred alignment for the Southern Link Road Network (as identified in the plan exhibited as part of the WSEA SEPP amendment 2014) with regard to clause 26 of the WSEA SEPP; and

In regard to Access, Section 3.3.3 of the Environmental Impact Assessment states that:

Access to the site would be facilitated via the proposed WNSLR which would connect in the north-eastern part of the site, providing a link north to Lenore Drive and the broader external road network. Construction of the WNSLR between the site and Lenore Drive forms part of the proposed Stage 1 works. Completion of the WNSLR as the primary access for the OWE would eliminate any reliance on Bakers Lane for site access. Bakers Lane would only be used for access during the early stages of the construction process, prior to the completion of the WNSLR. In the north-east corner of OWE the WNSLR will cross over the SCA Pipeline via a proposed bridge and connect into Lenore Drive approximately 1km to the north.

The connection to Lenore Drive is only one part of the Southern Link Road upgrade requirements to serve this employment precinct. Despite the issue being identified within the SEARs there does not seem to be any details provided as to how traffic will be restricted or controlled from using Bakers Lane to access Mamre Road which is a key road identified to serve the employment precinct to the north and south.

It is considered that the proposed realignment of the Southern Link Road along Bakers Lane for the Western Sydney Employment Lands requires detailed stakeholder consultation 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 development will have significant implications on Baker Lane and has not adequately addressed the potential for significant impacts on sensitive existing land uses. The proposal pre-empted 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.

In view of the above, we formally object to this proposal. We respectfully request a detailed response to this issue as part of the considerations of public exhibition process.

Yours faithfully,

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