

Our Ref: 18-002859

22 February 2019

The Secretary
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Chloe Dunlop

EIS Exhibition: 1111 Elizabeth Drive Subdivision, Cecil Park – Submission on behalf of CSR Pty Ltd

Dear Chloe,

Reference is made to the EIS on public exhibition of the proposed Elizabeth Drive Business Hub on the corner of Elizabeth Drive and Cecil Road at Cecil Park, within the Cecil Park North Precinct of the Western Sydney Parklands. This submission is made on behalf of CSR Building Products Pty Ltd (CSR), owner of the following properties directly opposite the proposed development on Cecil Road, Cecil Park. CSR operates a large scale brickworks on their lands (PGH Bricks and Pavers) immediately opposite and raises strong objection to the proposal as it has the potential to create land use conflicts with CSR's existing operations, by introduction of an incompatible land use.

CSR's holdings front both Cecil Road and Elizabeth Drive, Cecil Park and are located directly opposite the subject site on Cecil Road. CSR owns the following properties – Lot 4-8 and 10-14 on DP 236527, Lot 25 DP653888 and Lots 1-2 DP 533788, with a total area of 35.68ha. The site contains both an existing quarry and a brick making facility with the site possessing a longstanding use with a development history extending back more than 50 years. The EIS prepared for the adjacent business hub has failed to take into account the strategic importance of this use in terms of its operation and supply of bricks and related products to the Sydney region.

We have reviewed the EIS package for the proposed development and raise a number of concerns regarding the appropriateness of the proposed uses and the potential impacts on the operations of CSR's facility and the surrounding area. These includes strategic considerations and potential operational impacts such as traffic and wastewater management, as detailed further below.

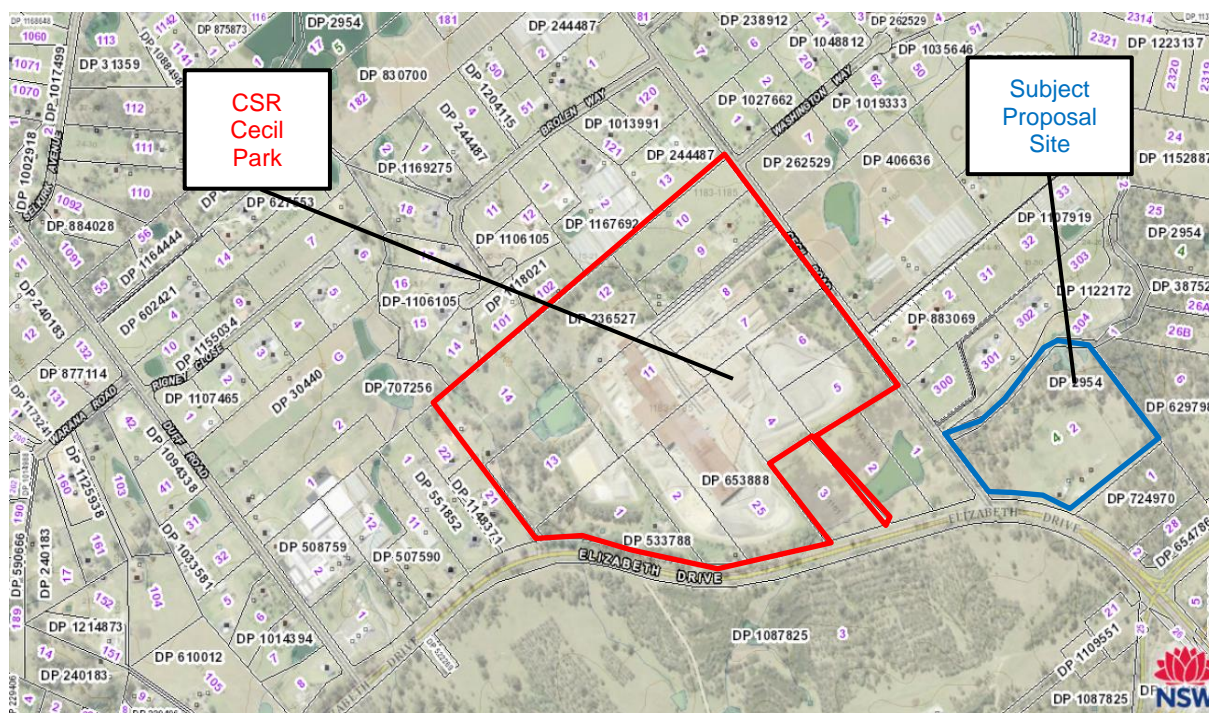


Figure 1: CSR current landholdings and operations at Cecil Park (outlined in red) and proposed Business Hub site (outlined in blue)

1 KEY ISSUES

This submission is made on behalf of CSR Building Products Pty Ltd, owner of 1183-1185 Elizabeth Drive, and Lots 5-8 & 10 Cecil Road, Cecil Park. Principally, this submission seeks to object to following matters:

1. The proposal is premature, being ahead of strategic planning and provision of services infrastructure planning, particularly for wastewater. Our understanding is that this servicing is not anticipated to be available in the proposed development timeframe.
2. The introduction of sensitive land uses such as child care centre and short term accommodation adjacent to CSR's Cecil Park site can lead to reverse amenity issues and complaints about CSR's current operations. The high volume of heavy vehicle traffic is likely to increase with time, given CSR's long term commitment to the site and anticipated future demand for construction materials in Sydney.
3. The proposed site is outside the Western Sydney Priority Growth Area and could, in conjunction with the other Business Hubs identified in the Western Sydney Plan of Management Supplement, potentially undermine the viability and staging of the Priority Growth Area by attracting land uses better suited to the employment core.
4. The plans for the Western Sydney Business Hubs appear to have been prepared without sufficient consideration of the suitability of the chosen sites for the proposed uses and in isolation of broader strategic planning goals. The site appears to have been chosen based on narrow commercial considerations, which are opportunistic and well ahead of the strategic planning process for this area, particularly key discussions relating to servicing, including wastewater.
5. The business hub proposal is well ahead of the Fairfield Rural Lands Study that has been conducted to identify the future land uses within the Fairfield region, however, is still in the investigation stage.

2 STRATEGIC CONSIDERATIONS

The site is not located within the boundary for the planned Aerotropolis as identified in the Western Sydney Aerotropolis stage structure plan released by the Department of Planning. Therefore, justification stemming from the Western Sydney Aerotropolis is not a valid argument for the proposed location of the business hub.

The closest centre for employee services is 3km in Cecil Park and the closest major centre is 10km to Leppington or 6km to Prairiewood, making the site inconveniently located for potential employees.

The future management of the proposed business hub needs to detail how it will connect with existing centres in terms of public transport services. Currently, the Cecil Park area is poorly serviced by 2 regional bus routes which will not be sufficient to provide access to the proposed business hub for employees or visitors, creating a heavy reliance on private vehicles.

2.1 Western Sydney District Plan

The Western Sydney District Plan identifies the objective to 'create a 30 minute city that provides quicker access to a wider range of jobs, housing types and activities'. The proposed business hub does not take into account ease of accessibility for workers and customers as well as available transport networks to and from the site in order to achieve this objective, being in a relatively isolated location not identified for urban development in the short to medium terms.

2.2 Fairfield Rural Lands Study

The development is premature considering the lack of definite strategic plans for the region. The Fairfield Rural Lands Study by Fairfield Council is still in the investigation phase in determining the future characteristics of the Cecil Park region. Whilst Draft Structure Plan options have been exhibited, no firm commitments have been made, and the proposal fails to consider the nature of the land use in its existing surrounds.

The proposal is premature and opportunistic and undermines the structure plan efforts done by Fairfield Council in order to plan for the future development and infrastructure provision within the region. Currently, there is no certainty to infrastructure and timing, therefore there can be no certainty about the timing and capacity of future wastewater infrastructure.

2.3 Western Sydney Parklands Plan of Management 2030

The site is included within the Western Sydney Parklands, however it is not included within a specific land use designation within the Plan of Management 2030. The site is located within the Cecil Park North precinct as identified in the Plan of Management, which currently indicates a land use intention for bushland and semi-rural paddocks, with longer term use undetermined. The Plan of Management Supplement identifies a Business Hub in the vicinity, however the nominated sites for this activity in the supplement do not include the subject land, as seen in Figure 2 and are still under investigation, pending designation by the Western Sydney Parklands Trust. The proposed site was originally specified in the Western Sydney Parklands Plan of Management 2020, however, the location has altered in the latest plan, which can be seen in Figure 2, suggesting that the proposed location should be reconsidered to align with the new strategic document. In our opinion, the site nominated in the Plan of Management 2030 is better suited to the proposed use than the site nominated in this EIS.



Figure 2: Western Sydney Parklands Plan of Management 2030- Cecil Park North Precinct Plan showing alternative location for Business Hub to that currently proposed.

The decision to locate a Business Hub on the subject land does not appear to consider the cumulative impact upon the Parklands at its narrowest point when considering the existing fragmentation from the M7 and the likely future fragmentation from the M12. Alienation of additional land from potential recreational use and from potential bushland regeneration could compromise the continuity of the Parklands in this location as well as future environmental and recreational linkages.

Further, the proposed business hub would contribute to the further fragmentation of the corridor linking the areas north and south of Elizabeth Drive as an ecological corridor, owing to the impacts of the M7 corridor and the future M12 corridor. Further erosion of this already narrow 'neck' in the Parklands may contribute to the further isolation of parts of the corridor.

3 ROAD, TRAFFIC AND ACCESS

As specified within the traffic and access report, the proposed business hub requires the construction of: A new public road with a junction on Cecil Road, a service road proposing two access points to Elizabeth Drive and off street parking. The expected increase in vehicular traffic that is to accompany the business hub along Elizabeth Drive and Cecil Road will impact on CSR's freight operations and cause conflicts with heavy vehicle movements, which will need to travel past the site frontage to access the regional road network.

CSR's business produces a large volume of materials which require heavy vehicles to transport the products to building and construction sites across Greater Sydney and surrounds. At present, trucks can access Elizabeth Drive and the M7 passing relatively few residences and other potentially sensitive uses. The introduction of a highway service centre that is projected to generate large amounts of traffic needs to consider how this will integrate with the current heavy vehicle movements occurring. The potential conflict that can arise with the traffic generated from the business hub from uses such as child care centres and hotel/motel uses site and the heavy vehicle movements generated by CSR's operations. The traffic report submitted within this EIS does not take sufficient account of surrounding existing land use, nor the strategic planning being undertaken by Fairfield Council for the Cecil Park area,

Additionally, the proposal has the potential to generate significant traffic in an area that is already subject to high volumes along Elizabeth Drive and which is likely to experience significant traffic increases as a result of the development of the Aerotropolis to the west and the implementation of the M12 Corridor. It would be premature to consider this development ahead of the detailed planning that could quantify the likely future demands on the road network and the necessary infrastructure to service it appropriately.

The proposed roundabout at the intersection of Cecil Road and Elizabeth Drive detailed in the EIS has the potential to cause traffic congestion, heightened by the heavy vehicle movement. This further reiterates the lack of consideration the EIS assumes towards the extent of heavy vehicle movements within the Cecil park region.

Further, it is unknown if the final location of the M12 corridor will have a direct effect on the road configuration in the vicinity of the Elizabeth Drive and Cecil Road junction. This may cause issues with congestion on Elizabeth Drive due to increased traffic volumes, and the location of future access points, such as the proposed service road on Elizabeth Drive and the proposed new access road from Cecil Road.

The site has poor connections to public transport networks and whilst there are some local bus connections, these are not strong enough to provide adequate transport options for visitors to and employees of the business hub, making the proposed development highly car dependent and isolated from surrounding facilities and services.

Congestion in the morning peak already occurs, so the introduction of a traffic generating land use would cause further congestion issues for the area, particularly with respect to the Wallgrove Road and M7 intersection/ interchanges with Elizabeth Drive.

4 POTENTIAL LAND USE CONFLICTS

The proposed hub will accommodate a range of uses which leverage off its location including; service station, hotel/motel accommodation, industrial/warehouse uses medical uses, childcare centre, "high-end" office space associated with aviation and similar specialisations. Many of these uses typically associated with Business zones in the standard LEP instrument and subject to the locational criteria and policies which are not typically associated with locations such as the subject site.

The nature of operations at CSR's Cecil Park facility, are incompatible with the proposed business hub. Employment uses such as Office space and child care centre will be incompatible to a major brickmaking and quarrying facility, which is currently well separated from surrounding sensitive land uses due to its rural setting. This reverse amenity will additionally impact on CSR operations in the future leading to the potential for increased complaints and objections to CSR interfering its lawfully established use of the land.

The EIS ignores the fact that major brick works are adjacent to the site, making no mention of the impact the business hub may have on operations.

5 WESTERN SYDNEY PARKLANDS

The proposed site is subject to the *State Environmental Planning Policy (Western Sydney Parklands) 2009*, which aim is to 'put in place planning controls that will enable the Western Sydney Parklands Trust to develop the Western Parklands into a multi-use urban parkland for the region of Western Sydney'. The site is currently considered unzoned land under the provisions, which provides for various Land Uses under Clause 11 of the SEPP. This clause provides for certain developments to occur within the Parklands without consent (subject to certain restrictions) and for other development (excluding residential accommodation) to occur with consent. Clause 12 of the SEPP outlines the matters the consent authority must consider in assessing applications for development within the Parklands.

The nomination of the site as a proposed business hub may not be suitable considering the location within the Western Sydney Parklands region and the business hub strategy should be revisited, particularly as the Plan of Management 2030 proposes an alternative location on Wallgrove Road.

6 WASTEWATER MANAGEMENT

The EIS provided for the business hub development has not satisfactorily addressed wastewater services. This is a significant consideration towards the suitability of the site for the proposed use as there is no wastewater servicing within the Cecil Park region and the proposed approach to using on site- pumps on each individual lot for sewerage is questionable. The closest sewerage facility for the area is 6km away and the majority of the Ropes Creek catchment does not have sewerage infrastructure and this is not yet planned for the area. The proposed development is therefore premature from a servicing standpoint.

The future management of the proposed business hub is important as it has the potential to negatively impact upon the surrounding community and respective land uses, particularly with respect to the proposed individual sewer pump out. The wastewater strategy proposal is a concern and a potential environmental risk, both in terms of ongoing amenity issues and the risk of environmental harm should these systems fail and discharge into the upper reaches of Ropes Creek. The proliferation of onsite sewer systems proposed is also a concern, increasing the likelihood of adverse environmental impacts occurring.

7 ECONOMIC ASSESSMENT

The Economic Impact Assessment provided within the Environmental Impact Assessment provides assumptions regarding the economic viability of the site, which takes into consideration the projected population growth for the region. This information is misleading due to the majority of population growth occurring 6km away at Austral rather than Cecil Park. Austral is 6km by road to the proposed commercial hub, therefore the proposed business hub will not necessarily benefit the new residential population within Austral, which will be serviced from proposed and existing centres, in more convenient and accessible locations.

The Economic Analysis relies heavily on the proposed Western Sydney Airport, which the site is distant from, and which is not expected to commence operations until 2026 at the earliest. The planned Aerotropolis is expected to cater for additional demand generated by the Airport, and is better located for this purpose than the subject site which is relatively isolated from existing and planned facilities and services. The only location advantage that the site has is its frontage and exposure to Elizabeth Drive, and its proximity to the M7 / M12 interchange in addition to the intersection of Elizabeth Drive and Wallgrove Road. In terms of broader locational criteria for a use of this nature, the site has few attributes that would recommend it over consolidating with existing and planned business centres. Alternatives to locating the proposed use on the subject site are insufficiently considered.

The development appears to be opportunistic, and does not have a sound economic basis for justifying development in this location as opposed to planned business centres in Western Sydney.

8 GAS EASEMENT

It is understood that the site is constrained with respect to commercial and sensitive land uses (particularly the proposed child care and hotel/motel uses) due to a gas easement that runs through the south-eastern side of the proposed site, and further easements containing major gas mains that are in close proximity to the site, at Wallgrove Road. These gas easements require substantial buffer distances, potentially sterilising the site for uses of this nature and the potential conflicts arising from the presence of the gas easements were not considered within the EIS.

9 CONCLUSION

CSR objects to the business hub proposal for the following reasons:

1. The proposed development is premature as the longer term land use in this area (including final alignments of major transport infrastructure) is not yet determined, as demonstrated by its inclusion in an Urban Investigation Area within the Western City District Plan. The proposal does not properly account for the recent strategic planning work undertaken by Fairfield City Council in the Rural Lands Investigation Study and how the proposed uses will interact with the proposed commercial centres in the draft structure plan options recently exhibited. Of particular concern is that the site is not yet included in a committed wastewater servicing strategy, and that the proposal is well ahead of the necessary services planning for the area.
2. The proposal also has the potential to fragment the Western Sydney Parklands, compromising its recreational and environmental values. The site is located within the narrowest portion of the Parklands, which has already been impacted by the M7 corridor. Additionally, the Western Sydney Parklands Plan of Management 2030 does not specify the proposed business hub to be located on the subject site and rather suggests an alternate location.
3. The wastewater strategy proposal within the EIS is a concern and a potential environmental risk as it has not satisfactorily addressed wastewater services, with the potential for individual site pump out systems persisting for many years, which has the possibility to negatively impact upon the surrounding community, both in terms of ongoing amenity issues and the risk of environmental harm should these systems fail and discharge into the upper reaches of Ropes Creek.

4. The Economic Impact Assessment relies on projected population growth that is remote from the site, being concentrated in the release areas around Austral and Rossmore, which is unlikely to utilise the proposed uses to the extent indicated. This calls into question the demand for the proposed land uses and the timing of the proposal, which is well ahead of any likely urban development in the Cecil Park/Horsley Park Area. The development appears to be opportunistic, and does not have a sound economic basis for justifying development in this location as opposed to planned business centres in Western Sydney.
5. CSR does not support the development of the site due to the potential for it to adversely affect its operations and to compromise the long term viability of a strategic resource through the introduction of incompatible land use. The EIS makes no mention of the impact the business hub may have on CSR's Cecil Park operations and the potential land use conflicts arising from the introduction of the proposed uses.
6. The expected increase in vehicular traffic that is to accompany the business hub along Elizabeth Drive and Cecil Road will impact on CSR's freight operations and cause conflicts with heavy vehicle movements. In addition, the proposed new roads and roundabout will cause further traffic concerns, given the volume of heavy vehicles needing to turn at this junction. The design of the access to the proposal does not take sufficient account of the proposed M12 corridor and consequential changes to access and circulation in the vicinity of the subject that will arise once the proposed road is designed.
7. The gas easement within the proposed site conflicts with sensitive land uses within the buffer region, particularly with respect to the proposed child care and hotel/motel uses and this was not considered within the EIS. The site is potentially further constrained from the buffers required to the major Jemena pipeline in the vicinity of Wallgrove Road.

Yours faithfully

Calibre Professional Services Pty Ltd



Tom Foster
Senior Planner