



9 December 2022

Department of Planning and Environment
Locked Bag 5022
Parramatta, NSW 2124
Attention: Neala Gautam

Dear Neala,

Re: Appin (Part) Precinct Planning Proposal

I refer to your correspondence dated 21 November 2022 in regard to the above proposal which is currently on exhibition. Baines Masonry Pty Ltd note that we have been invited by the Department of Planning and Environment to provide feedback on the draft plans of above proposal.

Baines Masonry Pty Ltd has reviewed the documentation provided on the Department Planning and Environment's website and provides the feedback in the addendum attached.

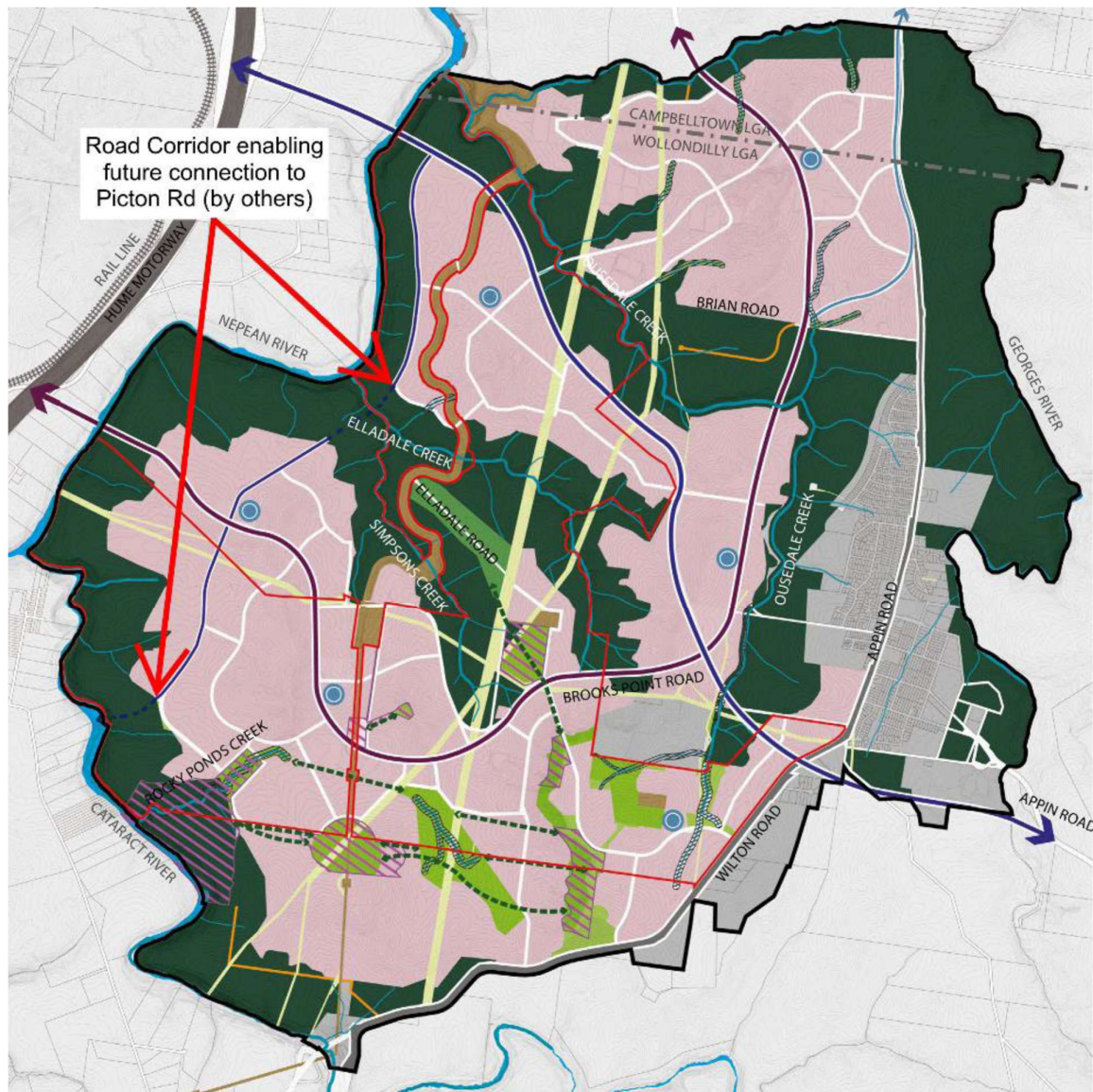
If you need any more information, please contact me.

Yours sincerely

Bill Hudson
General Manager

PROPOSED EAST-WEST CONNECTION ROAD

Refer to Appin and Appin North Strategic Transport Assessment, Rev D October 2022 Figure 3.4 page 15. See below.



LEGEND:

- Appin & North Appin Precincts Boundary
- Appin (Part) Precinct Boundary
- LGA Boundary
- Waterways
- C2 Conservation Land*
- Existing Road within C2 Conservation Land
- District Open Space
- Regional Open Space
- Easements (Potential for active and passive recreation)
- Green Links
- Riparian Corridor
- Planned State Heritage Listing Sites
- Heritage Items
- Residential
- Excluded Land
- Mixed Use Centres (including retail/commercial, schools and open space)
- East-West Connection Road
- Public Transport Corridor
- North-South Connection Road
- Appin Bypass
- Road Connection - By Others
- Collector Roads

* Where located outside Appin (Part) Precinct Boundary this represents Strategic Conservation Planning SEPP - Avoided Land (August 2022).

APPIN & NORTH APPIN PRECINCTS INDICATIVE PLAN

1:40,000 @ A4 DATE: 06-10-22
REVISION NO: B

The proposed East-West Connection Road is described as a *New four lane road between Neighbourhood 2 and Bulli-Appin Road by the 14,000 residential lot* on page 43 of the Appin and Appin North Strategic Transport Assessment, Rev D October 2022.

The proposed East-West Connection Road is shown to run directly through Lot 1 and Lot 2 DP112177, which is Baines Masonary Blocks Pty Ltd manufacturing site. See Figure 1 below.

Baines Masonary Pty Ltd has been conducting manufacturing operations on this site since the early 1970's. The site has been developed over this 50 year period for the manufacture of concrete masonry blocks and pavers, including an approved expansion in 2016.

This proposed East-West Connection Road needs to be completely re-routed so that it does not run directly through Baines Masonary Pty Ltd manufacturing site and facilities or interfere with the company's operations including unfettered site access.

The proposed routing of the East-West Connection through Baines Masonary Pty Ltd manufacturing facilities can only be described as very poor design planning by Walker Corporation. The long standing manufacturing facility is easily visible from simple tools such as Google Maps or SixMaps, and a search of recent council records would show DA applications for the expansion and continued long term operation (50+ years) of the manufacturing facility. The proposed routing as displayed should never have been allowed to reach the exhibition stage where it currently is. The assessment of the planning proposal by Department of Planning and Environment needs to reject outright the proposed East-West Connection Road in its current layout.

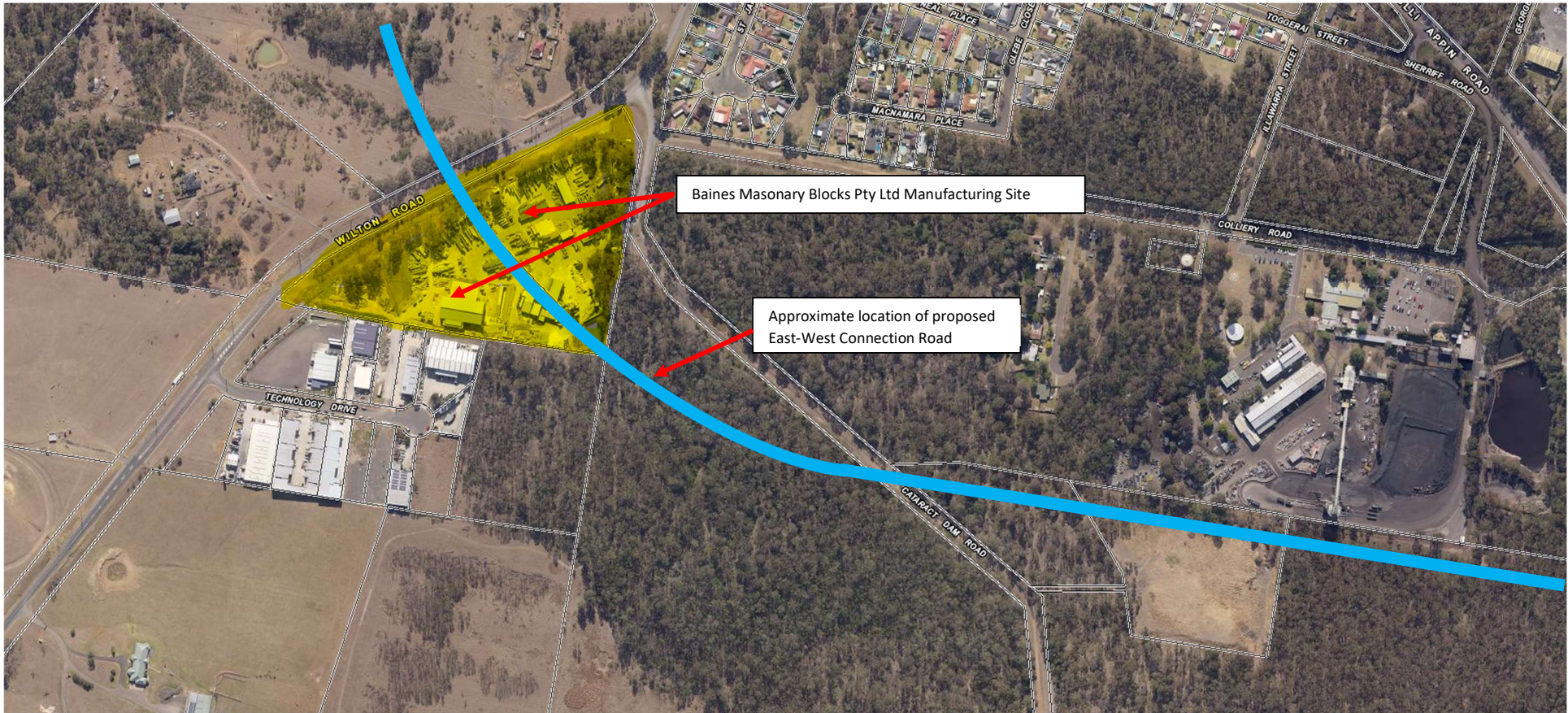


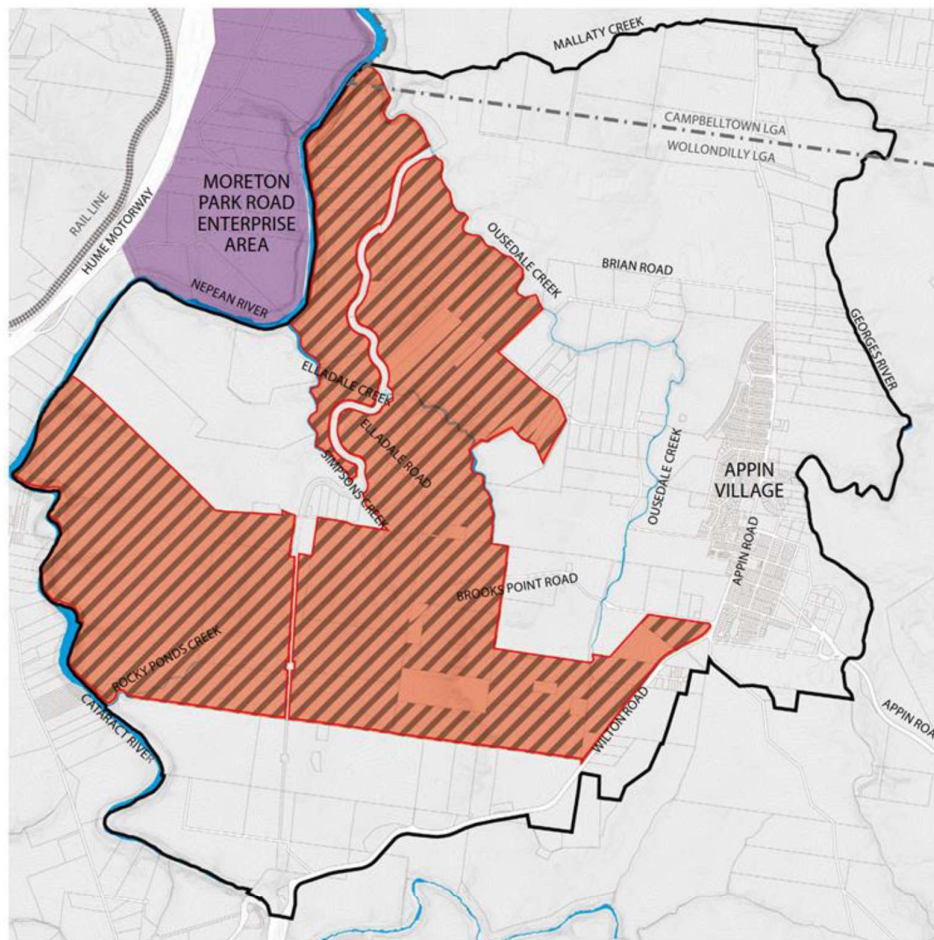
Figure 1. Proposed East-West Connection Road

EMPLOYMENT OPPORTUNITIES

Refer to page 26 Appin and North Appin Precincts – Retail and Employment Study October 2022 prepared by Urbis, which states:

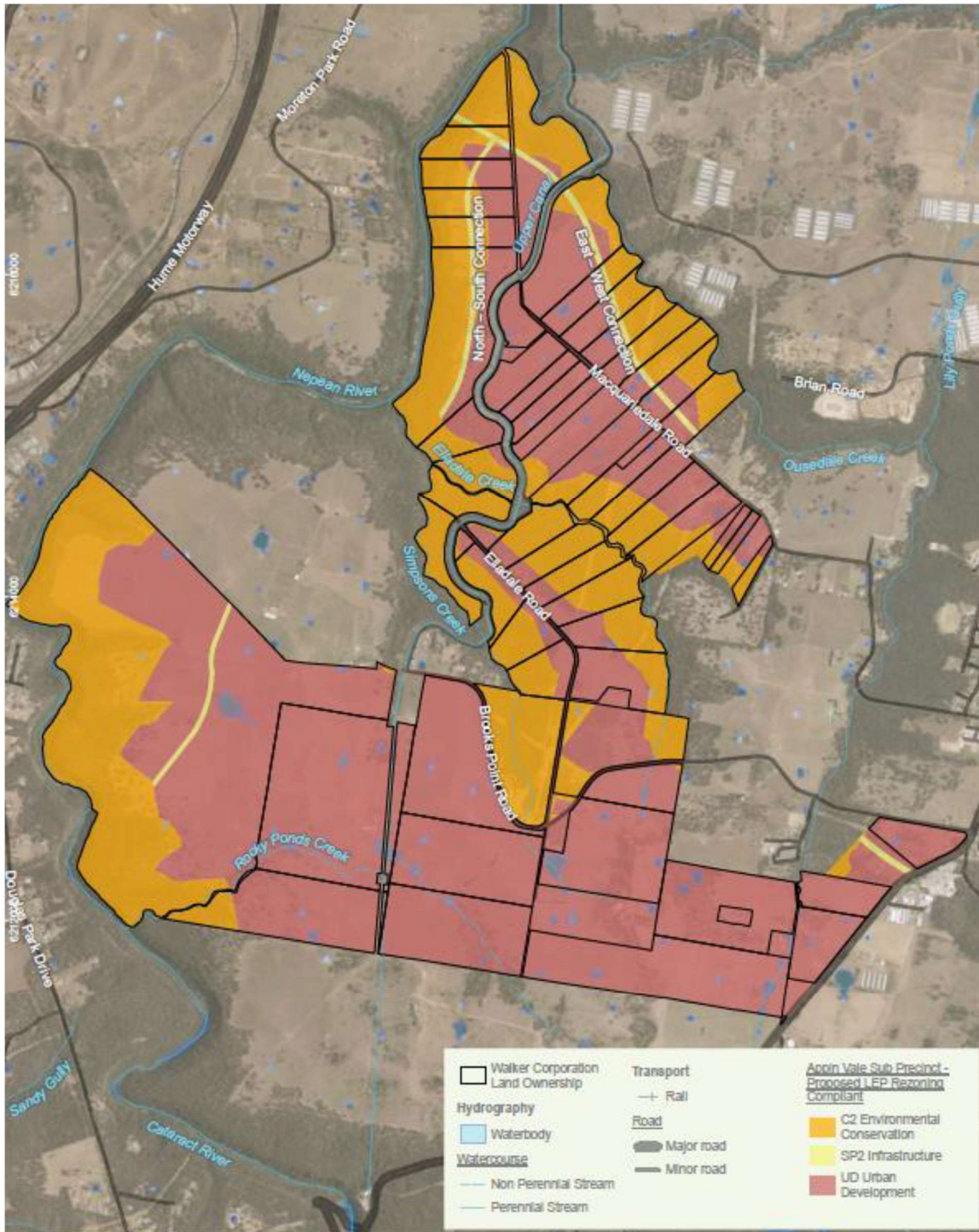
An expansion of employment land is proposed in Appin and Moreton Park which will increase the number of jobs within the Wollondilly LGA. The existing employment area in Appin is expected to deliver an additional 44 hectares of developable land. While the mooted Moreton Park Employment Zone could deliver around 255 hectares of developable land.

Refer to page 5 of Urbis Appin Sustainable Development Opportunities Report V1.3 which shows the below diagram. This diagram clearly shows the Morton Park Employment Zone, but does not show the proposed Appin Employment Zone. There is currently a manufacturing employment area at Wilton Rd and Technology Rd Appin. How does this area relate / interact with the unspecified Appin Employment Zone.



- LEGEND:**
- Appin & North Appin Precincts Boundary
 - Appin (Part) Precinct Boundary
 - - - LGA Boundary
 - Existing Waterways
 - Appin (Part) Precinct Site
 - Walker Land Ownership
 - Moreton Park Road Enterprise Area

Refer to Figure 28, page 77 The Greater Macarthur Growth Area Planning Proposal to Rezone Appin (Part) Precinct for Urban Development 14 November 2022 prepared by Walker Corporation Pty Ltd, showing Proposed Zoning (Version1) see below:



The above diagram does not identify the potential Land Use Zoning for the Morton Park Employment Zone, or the proposed Appin Employment Zone. What Land Use Zoning will these areas

be? Have areas been set aside for Industrial Zoning eg 1N1, 1N2, 1N3, E4, E5, and how do these zonings reflect:

- The types of jobs that have been identified in the Appin (Part) Precinct Planning Proposal for creation,
- How they interact with, support and compliment existing non-retail Land Use Zonings in the area, eg around Wilton Road / Technology Drive Appin

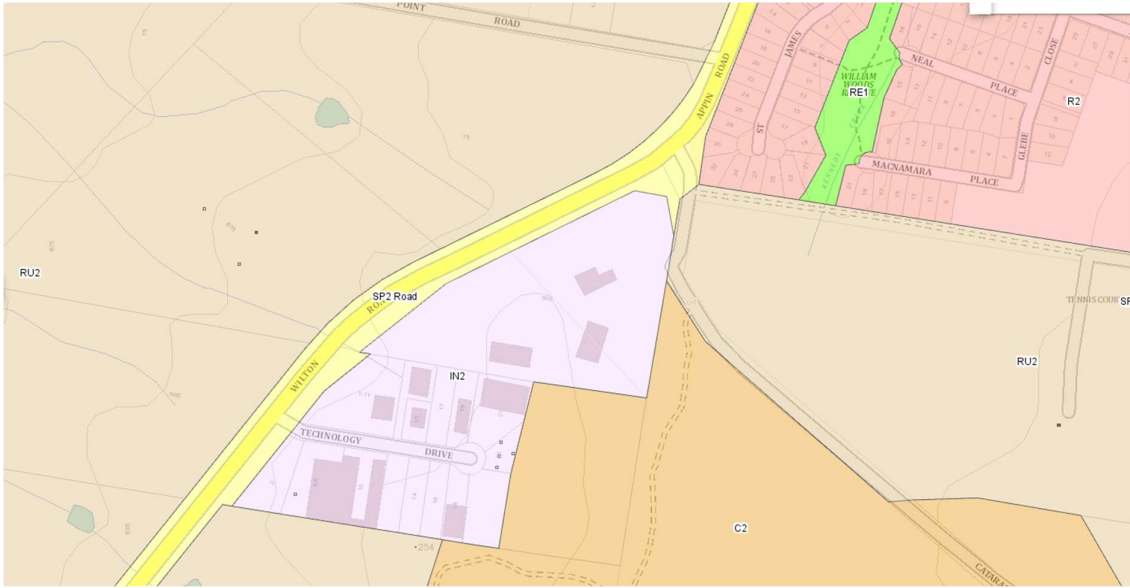


Figure 2 Land Use Zoning Wilton Rd / Technology Drive

ACCESS TO EMPLOYMENT AND TRAINING

Refer to page 17 of Social and Health Impact Assessment Comment Form Appin (Part) Precinct Structure Plan and Release Area 10 October 2022 prepared by Urbis, which describes how the development will impact the quality and/or diversity of local employment opportunities.

This Assessment of Impacts has completely failed to identify the negative impact caused by the proposed routing East-West Connection Road. The proposed East-West Connection Road which is described as a New four lane road between Neighbourhood 2 and Bulli-Appin Road by the 14,000 residential lot on page 43 of the Appin and Appin North Strategic Transport Assessment, Rev D October 2022 is shown to run directly through Baines Masonary Blocks Pty Ltd manufacturing site at 900 Wilton Rd Appin. See Figure 1 above. The construction of the proposed East-West Connection Road will cause the closure of Baines Masonary Pty Ltd manufacturing operations, and the cessation of all business activities. This will result in the loss of approximately 40 direct and indirect jobs associated with this business. As such, the structure of the plan will decrease the quantity and diversity of employment opportunities available to the community, and will create a negative employment impact.

Due to the failure to identify the negative impact of the East-West Connection Road on Baines Masonary Pty Ltd manufacturing facility, any proposed measures to avoid, reduce or mitigate any negative impacts has not been identified. To avoid the negative employment impact, the proposed East-West Connection Road needs to be re-routed so that it does not run directly through Baines Masonary Pty Ltd manufacturing site and facilities or interfere with the company's operations included unfettered site access.

The proposed routing of the East-West Connection through Baines Masonary Pty Ltd manufacturing facilities can only be described as very poor design planning by Walker Corporation, and very poor Assessment of Impacts by Urbis Pty Ltd. The assessment of the planning proposal by Department of Planning and Environment needs to reject outright the proposed East-West Connection Road in its current layout.

Baines Masonary Pty Ltd has been conducting manufacturing operations on its site at 900 Wilton Rd Appin since the early 1970's. The site has been developed over this 50 year period for the manufacture of concrete masonry blocks and pavers, and is currently operation under 2016 Development Consent 010.2016.00000861.001 conditions which are:

Operating Hours:	Monday – Friday 5:00am – 10:30pm Saturday 6:00am – 5:00pm Sunday, Public Holidays – Nil
Activity:	70,000 tonnes per annum of concrete products.

All incoming materials and finished goods despatches are via heavy vehicles, equating to approximately 4,500 heavy vehicle movements per annum at the site.

Figure 3 below (adapted from Appin and Appin North Indicative Plan Rev A 06/10/2022) shows the locality of Baines Masonary Pty Ltd manufacturing site in relation to residential development within the Appin (Part) Precinct. Residential lots are proposed along Wilton Road directly opposite Baines Masonary Pty Ltd manufacturing site.

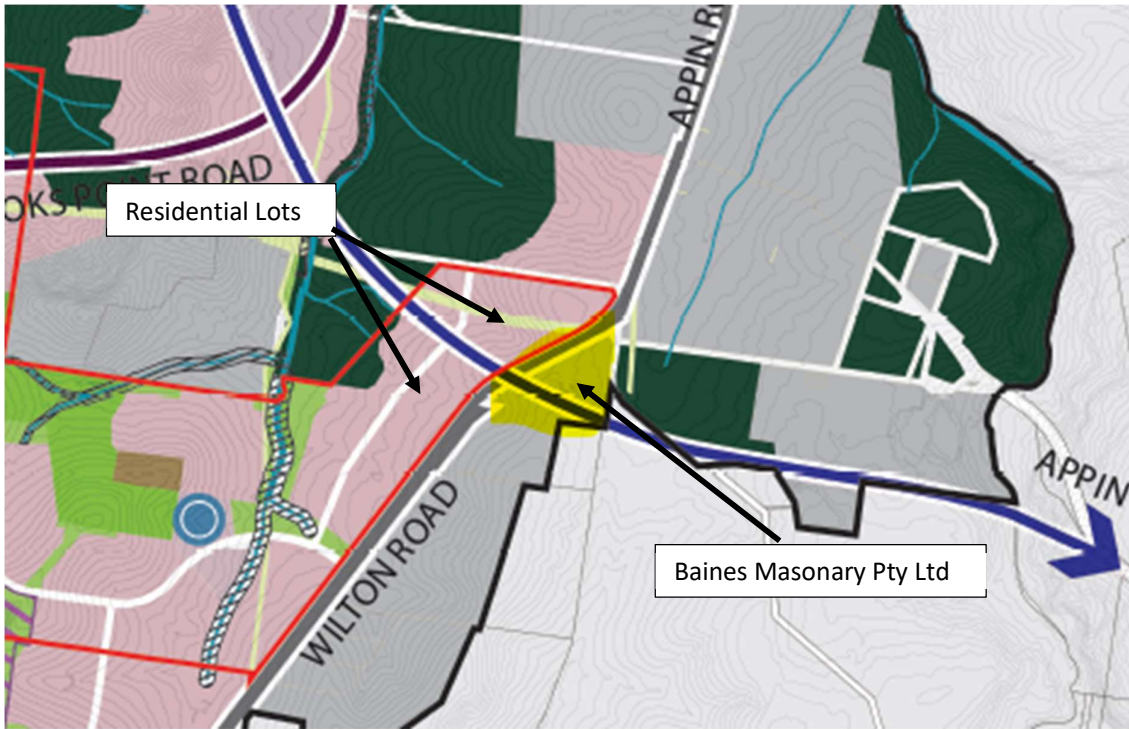


Figure 3 Baines Masonary Pty Ltd

The Assessment of Impacts by prepared by Urbis needs to identify potential Impacts from Baines Manufacturing operations on the residences, and identify potential negative impacts on Baines Masonary Pty Ltd operation as a result of those impacts. For example, will there be potential restrictions to current operating hours, activity or heavy vehicle movements as a result of the proximity of residences. From these potential impacts, proposed measures to avoid, reduce or mitigate any negative impacts to Baines Masonary Pty Ltd operations, and local employment, need to be identified eg installation of sound barriers, dedicated traffic management etc etc. and implemented at the time of development. There is a plethora of situations where residential dwellings have been positioned adjacent to existing established manufacturing or industrial operating sites, and community reaction has severely affected or closed those operations. This Assessment of Impacts needs to identify measures to ensure that this does not occur to Baines Masonary Pty Ltd manufacturing operations, and negatively impact employment opportunities.

LOCAL ECONOMY

Refer to page 18 of Social and Health Impact Assessment Comment Form Appin (Part) Precinct Structure Plan and Release Area 10 October 2022 prepared by Urbis, which describes how the development will impact the local economy.

As detailed above, this Assessment of Impacts has completely failed to identify the negative impact caused by the proposed routing East-West Connection Road. The construction of the proposed East-West Connection Road will cause the closure of Baines Masonary Pty Ltd manufacturing operations, and the cessation of all business activities. This will negatively impact the Gross Regional Product of the Appin Area by approximately \$15M per annum. The assessment of the planning proposal by Department of Planning and Environment needs to reject outright the proposed East-West Connection Road in its current layout.

Similarly, the Assessment of Impacts by prepared by Urbis has failed to identify potential Impacts from Baines Manufacturing operations on the Wilton Road residences opposite Baines Masonary Pty Ltd manufacturing site, and subsequently identify potential negative measures on Baines Masonary Pty Ltd operation as a result of those impacts. This Assessment of Impacts needs to identify measures to avoid, reduce or mitigate any negative impacts to Baines Masonary Pty Ltd operations to ensure that there is no negative impact to the local economy. Baines Masonary Pty Ltd contributes approximately \$15M per annum to the local economy.

SUMMARY

Baines Masonary Pty Ltd has been conducting manufacturing operations on its site at 900 Wilton Road Appin since the early 1970's. The site has been developed over this 50 year period for the manufacture of concrete masonry blocks and pavers.

The proposed East-West Connection Road, which is described as a New four lane road between Neighbourhood 2 and Bulli-Appin Road by the 14,000 residential lot, is shown to run directly through Baines Masonary Blocks Pty Ltd manufacturing site. The construction of the proposed East-West Connection Road will cause the closure of Baines Masonary Pty Ltd manufacturing operations, and the cessation of all business activities. This will result in the loss of approximately 40 direct and indirect jobs associated with this business, and approximately \$15M Gross Regional Product of the Appin Area. The proposed East-West Connection Road needs to be completely re-routed so that it does not run directly through Baines Masonary Pty Ltd manufacturing site and facilities or interfere with the company's operations included unfettered site access.

Residential lots are proposed along Wilton Road directly opposite Baines Masonary Pty Ltd manufacturing site. An assessment of impacts needs to identify potential Impacts from Baines Manufacturing operations on these residences, and identify potential negative measures on Baines Masonary Pty Ltd operation as a result of those impacts. From these potential impacts, proposed measures to avoid, reduce or mitigate any negative impacts to Baines Masonary Pty Ltd operations need to be identified and implemented during the development. Any potential negative impacts on Baines Masonary Pty Ltd operations will negatively impact local jobs and negatively impact the local economy.