

ITEM NO: 10

SUBJECT: DEVELOPMENT APPLICATION NO. X/1004/2007 FOR A SKATEPARK ON PART LOT 6 DP 661403, SUMMERHAYES PARK, 326-340 HAWKESBURY ROAD, WINMALEE.

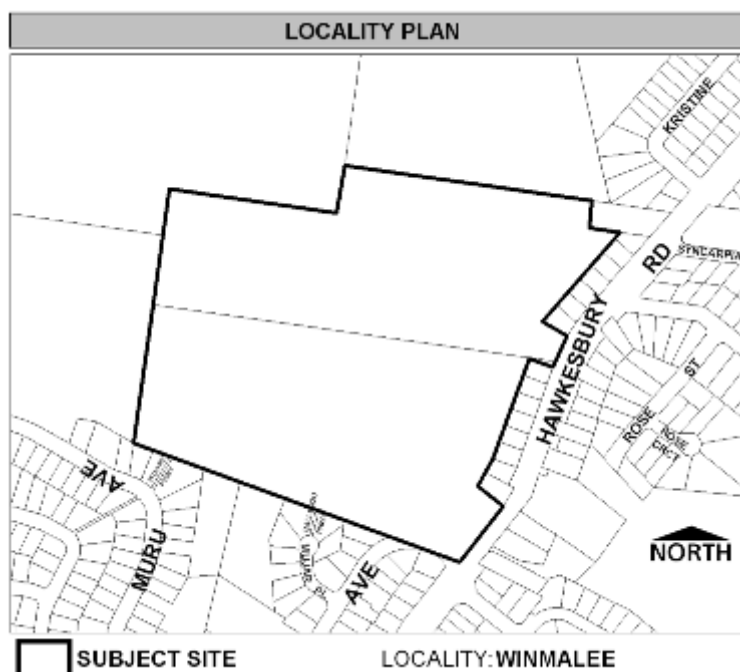
FILE NO: X/1004/2007

Recommendation:

That the Development Application No. X/1004/2007 for a skatepark on Part Lot 6 DP 661403, Summerhayes Park, 326-340 Hawkesbury Road, Winmalee be determined pursuant to S.80 of the Environmental Planning and Assessment Act 1979 by the granting of consent subject to conditions shown in Attachment 1 to this report.

Report by Group Manager, Environmental and Customer Services:

Reason for report	Property owned by the Council. Generated significant public interest.
Applicant	Blue Mountains City Council
Owner	Blue Mountains City Council
Application lodged	12-October-2007
Property address	Summerhayes Park, 326-340 Hawkesbury Road, Winmalee



Site description

The skate park is proposed at Summerhayes Park, the primary recreational resource for Springwood and Winmalee. Summerhayes Park comprises ten hectares of land containing playing fields, tennis courts, netball courts and associated infrastructure within a bushland setting.

The skatepark is proposed for the south-eastern corner of the park, at the corner of Hawkesbury Road and Bunnal Avenue, in an open grassed area, in close proximity to the street frontages and adjoining residential premises.

A new tennis court facility is under construction in the park directly to the north-west. An intermittent watercourse and bushland are located approximately 130 metres to the west.

Proposal

The skatepark measures 20.6 metres by 20.6 metres with a total footprint area of 424.36 m². The facility comprises an open concrete structure with galvanised metal rail components around a central landscaped island. The structure has a setback of approximately 10 metres from the Hawkesbury Road boundary, and variable height of approximately 900mm above finished ground level. Associated landscaping, fencing, seating, drainage works and signage form part of the development.

The application has been presented with a statement of environmental effects, acoustic report, concept landscape plan and structural design plans by Convic Design.

A copy of the plans showing the site area and extent of the works proposed are provided in Attachment 2 to this Report.

Background

The following chronology outlines the history leading up to the submission of the development application.

25 June 2002

A Notice of Motion was made at the Ordinary Meeting of Council for a report to come before the Council on possible sites for improved skate facilities in the Springwood/Winmalee area.

(Minute No. 253, 25/06/02)

24 September 2002

Summerhayes Park was identified in the report as the preferred location. The Council resolved to exhibit the report for public comment.

(Minute No. 396, 24/09/02)

29 April 2003

The Council resolved to adopt Summerhayes Park as the preferred site and that issues of concern raised by residents and

stakeholder groups be addressed through the master planning design process for Summerhayes Park.

(Minute No. 165, 29/04/03)

2 December 2003

The Council resolved to amend the Plan of Management for Summerhayes Park to provide for the skate park. The amendment was to include a detailed Master Plan for the site including full consultation and consideration of issues.

(Minute No. 592, 2/12/03)

29 June 2004

The Council adopted the Draft Plan of Management and Master Plan for public exhibition. The skatepark location was identified as the corner of Bunnal Avenue and Hawkesbury Road.

(Minute No. 287, 29/06/04)

14 July 2004 to 24 September 2004

Draft Plan of Management was publicly exhibited, and included a public hearing on 13 September 2004. Strong public objection was received to the location of the skatepark.

23 November 2004

The amended Summerhayes Park Plan of Management for the skatepark was reported to the Council. The report contained the Public Hearing Report by Chadwick & Williams Ecological Consultants. Recommendation 7 in the Public Hearing Report states:-

- “7. *That the Draft Plan of Management be reworked and resubmitted for public exhibition with regard to the proposed skatepark. This will require further community consultation, focusing on adjacent residents, and exhaustion of all possible alternative sites*”.

Council resolved to adopt the Plan of Management. Motion 4 of the resolution states:-

- “4. *That privacy fencing and advanced screen planting to the most adjacent neighbour be taken into account when the development application is considered in 2007/2008*”.

(Minute No. 503, 23/11/04)

13 March 2007

The Council approved the tender for Convic to design and construct the skatepark (Minute No. 52, 13/03/07). The design

process involved a steering committee with representation of various stakeholders, workshops with young people and an information day. Objections were received on the public information day – primarily to the skate park location.

12 October 2007

Development application submitted.

Development controls

Zoning – Local Environmental Plan 2005

- + Recreation – Open Space
- + Environmental Protection – Open Space
- + Regional Transport Corridor (Road)
- + Protected Area – Slope Constraint Area
- + Protected Area – Vegetation Constraint Area
- + Protected Area Ecological Buffer Area – Significant Vegetation
- + Protected Area Ecological Buffer Area – Riparian Corridor

Better Living Development Control Plan.

Sydney Regional Environmental Plan No. 20 – Hawkesbury Nepean River.

Notification

The application was advertised for a period of 30 days from 31 October 2007 to 30 November 2007 in the Blue Mountains Gazette as well as written notification to adjoining and nearby properties.

A total of seventeen submissions were received. Of these, seven submissions support the proposal and ten submissions are opposed. The submissions in support of the skatepark are from residents in Springwood and Winmalee not living near the site.

Submissions opposed to the development represent eleven households in close proximity to the site and are in the form of nine single submissions and one joint submission. The joint submission has been prepared by a consultant town planner commissioned by the local residents. This submission contains a petition signed by forty residents opposed to the skatepark. The primary reason for objection is that the skatepark is too close to residential premises. Other concerns raised include traffic, noise, privacy, pedestrian safety, parking, property devaluation, anti-social behaviour, litter and lack of toilet facilities.

Following receipt of advice from the Roads and Traffic Authority and the NSW Police, and on site consultation with adjoining property owners in regard to screening and other issues, the application was amended. Amendments include the

provision of four car parking spaces in Bunnal Avenue, mounding and additional landscaping works adjacent to the adjoining dwelling in Hawkesbury Road.

The amended application was renotified and seven submissions were received. The submissions state that the amendments do not resolve the fundamental issue that the skate park is inappropriately located.

Issues

- Resident issues –
- + Unsuitable location
 - + Noise
 - + Privacy
 - + Traffic
 - + Pedestrian crossing
 - + Parking
 - + Toilet facilities
 - + Crime
 - + Litter

- Assessment issues –
- + Location
 - + Noise
 - + Privacy screening and landscape planting
 - + Traffic, parking and pedestrian safety
 - + Crime minimisation

Compliance Table: Local Environmental Plan 2005

Clause	Standard	Proposed	Compliance
cl. 32	Permissibility of Land Use	Recreation facility	Yes
Schedule 4	Locality management – Recreation – Open Space	Building setback of 10m from road complies with 8m minimum requirement	Yes
cl.34	Development near zone boundaries	The entry to the facility encroaches approximately 1 metre into the Regional Transport Corridor zone.	See clause 132 below
cl.45	Protected Area – Slope Constraint Area	Located clear of protected area	Yes
cl.46	Protected Area – Vegetation Constraint Area	Located clear of protected area	Yes
cl.47	Protected Area – Ecological Buffer Area	Located clear of protected area	Yes

cl.56	Site disturbance and erosion control	The site is gently sloping and contains minimal vegetation of value within the development footprint. Site disturbance is minimal.	Yes
cl.57	Stormwater management	The structure is small in size and will not generate significant stormwater run-off. Surface water drains to a soakstone drainage treatment device in the landscaped centre island of the skatepark. Remaining surface water will sheet flow onto grassed areas.	Yes
cl.60	Consideration of character and landscape	Development is appropriate in terms of scale, materials and landscape finish.	Yes
cl.68	Consideration of heritage conservation	The proposal will have no impact on the heritage significance of the heritage item 'Heatherbrae' (WL002) located opposite the site at 363 Hawkesbury Road.	Yes
cl.78	Bushfire	The land is mapped as bushfire prone. The concrete construction of the building, managed Asset Protection Zones and means of evacuation are satisfactory.	Yes
cl.87	Crime Minimisation Assessment	The issues of surveillance, access control, territorial reinforcement and space management are addressed in the discussion.	See discussion
cl.98 & 99	Access	The nature of the access to the site and car parking are addressed in the discussion.	See discussion
cl.107	Disabled access	The facility is accessible to spectators with a disability	Yes
cl.128	Community Land	Consistent with Plan of Management applying to site	Yes
cl.132	Development in Regional Transport Corridor	<p>The corner of the skate structure and the bin enclosure, signage and entry path encroach into the Regional Transport Corridor zone by approximately 1 metre.</p> <p>The RTA has consented to the encroachment subject to future adjustments for road widening being at the Council's expense.</p> <p>It is not practical to move the facility out of the road widening area due to the slope of the land.</p>	Yes
cl.133	Development adjoining Regional Transport Corridor	<p>No new vehicle access points are proposed onto Hawkesbury Road. Vehicle access will be from Bunnal Avenue only.</p> <p>The facility encroaches on the 18 metre setback from Hawkesbury Road by approximately 8 metres. However the encroachment will not result in the creation of a traffic hazard.</p>	Yes

Compliance Table: Better Living Development Control Plan

The development meets the provisions in Part D9 “Other forms of development” in the Better Living DCP, with the exception of parking. The DCP requires 1 space per 25 m² of gross floor area for a recreational facility. The proposal provides 4 car parking spaces, considerably less than the minimum 16 required. Car parking is addressed below in this report.

Discussion of Issues**1. Location**

The difficulties in finding a suitable location for a skatepark in the Springwood/Winnmalee area, and resident opposition to the chosen location, are well documented in the process leading up to the adoption of the Plan of Management in 2004 and beyond. The chosen location meets the necessary criteria for visual surveillance but places the facility very close to residential premises, the closest of which is 30 metres away. There are a further 12 residential properties within 100 metres of the facility. Noise, privacy, traffic and security are valid concerns in this location.

Several resident submissions point out that the skate parks at Glenbrook, Lawson, Katoomba and Blackheath have a much greater setback from residential premises. In 2001, the Council decided to have a skate park proposed for St Johns Road, Blaxland Oval relocated to Glenbrook due to close proximity to residential premises, the closest of which was approximately 30 metres from the proposed facility. The Council and the State Government have no policy on minimum setbacks, however 100 metres has been suggested as a minimum setback in other local government areas.

The close proximity to neighbours and the consequent amenity impacts were recognised by the Council when adopting the Plan of Management in 2004. Privacy fencing and advanced screen planting to the most adjacent neighbour were identified as requiring particular attention at development application stage. This has been addressed by on site meetings with affected residents to negotiate a suitable solution, the outcomes of which are incorporated into the final landscape plan.

2. Noise

Nearby residents express concerns that the noise generated by the use of the skatepark will be unreasonably intrusive. Activities causing noise will include dropping, scraping and rolling of skateboards on the galvanised metal and concrete components of the structure, as well as the voices of users and spectators. The application provides no details of the expected maximum number of users present at any one time. Peak usage is expected to occur on weekends, school holidays and after school hours.

The application includes a report prepared by an acoustic consultant that addresses the likely noise levels. The report refers to the Industrial Noise Policy published by the NSW Environmental Protection Authority which specifies 5dBA above background noise level as an acceptable level. Background noise levels at the four closest residential premises were measured on various days at times ranging between 2.20 pm and 4.30 pm. The actual noise levels generated by the skate park were estimated using noise measurements at three typical skate parks in other locations.

The report found that the noise levels from the use of the park will not exceed 5dBA above background noise level, and concludes that “*the noise measurements carried out and the*

associated assessment indicates that the noise that would emanate from the proposed skate facility at Winmalee will meet the recommended noise criteria at the nearby residences”.

The report does not address noise levels in the evening. The skate park will be accessible 24 hours and is likely to be used until at least 8 pm in summer months. Later usage may be possible depending on the effectiveness of shields to the tennis court lighting. It is possible that noise levels may become intrusive in the evening when background noise level declines with decrease in traffic volume.

While the noise generated may not exceed 5 dBA above background noise level, noise is still expected to be audible at adjoining premises. The amended application proposes an earth mound between the immediate adjacent residence at 342 Hawkesbury Road and the skate park as a noise attenuation measure. This has a length of approximately 25 metres, rising to a height of 2 metres, and is planted with screening vegetation.

The NSW Police submission identifies another potential noise source from skate boarding on the pathway between the new tennis courts and residential premises. It is proposed to construct the section of pathway between the tennis courts and the skatepark in a soft non-skatable surface.

Noise was not a matter requiring specific attention in the Council’s resolution of 23 November 2004.

3. Privacy

The skatepark has the potential to attract many users and spectators which will impact on the privacy of the closest residential premises at 342 Hawkesbury Road.

The Council’s resolution of 23 November 2004 requires privacy fencing and advanced screen planting to the most adjacent neighbour be taken into account in assessment of the development application. Council staff have had several on site meetings with Councillors and residents to discuss these matters, and the current landscape plan reflects the outcomes of the most recent meeting on 30 April 2008.

The proposed privacy screening consists of a 2 metre high earth mound and landscape planting adjacent the nearest property at 342 Hawkesbury Road. Part of the mounded area, and the adjacent established vegetation to the east, are to be fenced with 1.8 metre high black chain wire fencing to exclude public access for the full length of the adjacent property. Planting on the mound will discourage use by spectators on the unfenced portion. The landscape plan is provided in Attachments 2 and 3 to this Report.

It was originally proposed to supplement existing plantings along the boundary fence with plantings of *Eucalyptus maculata*. In a submission dated 2 June 2008, the owners of the adjoining property expressed a preference for native shrub planting instead of eucalypts. Eucalypts will provide no privacy screening when mature, and those planted on the mound could become unstable. The plan has been amended to provide a mixture of suitable native shrubs.

It is not proposed to screen the skatepark from the road as this would work against the need for visual surveillance from public areas. At the site meeting with residents on 30 April 2008,

the Council offered to supply shrubs to neighbours wishing to plant additional screening on their properties.

4. Traffic, parking and pedestrian safety

The facility will increase the number of users of Summerhayes Park and increase vehicular and pedestrian traffic in the location. A large number of resident submissions raise concerns about traffic and pedestrian safety.

The RTA has provided the following comments:-

- 1. The volume of pedestrians expected to be generated by this development and their origin and destination needs to be investigated and safe pedestrian facilities provided as appropriate. Any proposed facilities within Hawkesbury Road will need to be forwarded to the RTA for concurrence.*
- 2. All pedestrian areas associated with the skate park should be located outside the Hawkesbury Road clear zone in accordance with the RTA Road Design Guide. If this is unable to be achieved or there is any danger of cyclists or pedestrians causing conflict on Hawkesbury Road then the Council should consider the provision of pedestrian fencing.*
- 3. A drop and pick up area should be included however this area should desirably not be located on Hawkesbury Road.*

The RTA's advice has been considered and pedestrian safety aspects incorporated into the current plan, including a rumble strip to discourage rapid exit from the skate park onto the footpath. "No stopping" signage will be necessary in Hawkesbury Road to prevent the frontage being used as a drop off and pick up area. The NSW Police recommend the provision of a pedestrian crossing on Hawkesbury Road and the provision of four car parking spaces. This advice has also been considered and parking has now been incorporated into the plan.

Parking

Summerhayes Park contains a central car park located more than 200 metres from the skate park. The car park is unlikely to be used by skate park users when street parking is available closer to the facility. In accordance with NSW Police recommendation, the application has been amended to provide four car parking spaces in Bunnal Avenue using an existing recessed area.

The Better Living DCP specifies a parking rate of 1 space per 25 square metres for recreational facilities. Applying this standard would require provision of 16 car parking spaces. This number would appear excessive when most users will be children travelling on public transport, bike or skateboards, or will be dropped off by parents. Four spaces, as suggested by the NSW Police, is considered an acceptable number. Any overflow can be accommodated along the kerb in Bunnal Avenue. The parking area and adjacent kerb is also suitable as a drop off and pick up area.

Pedestrian crossing

Advice from the RTA and the NSW Police is that a pedestrian crossing in Hawkesbury Road is necessary. The nearest pedestrian crossing is located 500 metres south along Hawkesbury Road at the neighbourhood shopping centre, and a pedestrian crossing is located at the traffic lights 850 metres north at Whitecross Road.

There is presently no pedestrian crossing provided for the major entry point of Summerhayes Park. The applicant has considered the need for a crossing, but recommends this be considered as a separate project from the skate park alongside other road safety projects. The Council would need to liaise with the RTA who may require the Council to fund the crossing. This can be negotiated with the RTA as a separate matter and is not proposed as part of the skate park application.

Building setback and traffic safety

A minimum 18 metre setback from an arterial road is required under Clause 133(4) of LEP 2005, unless the consent authority is satisfied the circumstances would warrant a lesser setback and this would not result in the creation of a traffic hazard. The skate park has a setback of approximately 10 metres from the Hawkesbury Road boundary. A greater setback is constrained by the increasing slope of the land and a sewer main. The development can reasonably meet the traffic safety recommendations of the RTA and NSW Police by locating parking and the drop off/pick up area in Bunnal Avenue. The 10 metre setback proposed will not compromise traffic safety.

It should be noted the site is subject to future road widening of 10 metres. The RTA have consented to any necessary encroachment, but put the Council on notice that it will be responsible for any necessary future adjustments to the facility should road widening take place in the future. Potential adjustments would be to the entry area on the eastern side of the skate park and to the existing shared pedestrian/cycle path.

5. Toilet facilities

The site is located approximately 280 metres from the toilets in Summerhayes Park. Residents have expressed concerns that users of the skate park will not travel this distance and instead make use of the surrounding area and bushland. The proposed dense landscaping along the boundary of the adjoining property is an area likely to be used.

The facility is not of sufficient size to justify provision of dedicated toilet facilities. Fencing of the landscaped area between the skate park and nearest neighbour is proposed to prevent public access. Direct access to the toilets in Summerhayes Park will be available via a new pedestrian pathway.

6. Crime

Public submissions raise concerns that the facility will attract antisocial behaviour. The NSW Police in their written advice acknowledge existing problems with graffiti and hoodlum activity in the Summerhayes Park location.

One of the main criteria for choice of location is its high visibility from Hawkesbury Road for passive surveillance. The fact that passive surveillance is given such a high priority in the location of the skate park, in preference to other locations, is an indicator of the behavioural problems such a facility may attract. The burden of reporting the occurrence of incidents on the site will be carried by the closest neighbours, another reason why a greater between the facility and residential premises is desirable.

Grffiti vandalism is a significant concern raised in the resident submissions. Based on the experience of other skate park facilities, it can be expected that graffiti will occur on most exposed surfaces, as has occurred at other skate park sites. This has been taken into

consideration in the design which has the advantage of fewer vertical surfaces for graffiti application compared to the Council's other skate parks.

The Police recommend lighting of the facility to enable observation of persons from the roadway, however lighting is intentionally excluded from the proposal so as to discourage evening use. The Police also recommend the skatepark be made an Alcohol Free Zone. Council has erected signs prohibiting the consumption of alcohol at various parks and sportsgrounds across the Mountains under Section 632 of the Local Government Act 1993. To assist police in enforcing no alcohol in the skatepark area, it is proposed to erect the necessary signage at the entrance to the skate park.

The layout of the facility and fencing out of the vegetated beside the closest dwelling serve to clearly delineate between public and private space and to encourage the ownership of public space.

7. Litter

Bins will be provided and the skate park will be added to a litter collection service.

Conclusion

The development application for a skate park at Summerhayes Park arises from a lengthy process to secure a necessary facility for young people in Winmalee and Springwood. At each point in that process, the concerns of locating a skate park in close proximity to residential properties has been identified and expressed by residents. On planning grounds, many of the concerns raised in relation to this application are legitimate, and can be expected when such facilities are proposed in close proximity to people's homes.

Balanced against this, the Council had undertaken a review of alternative sites that may more appropriately provide a venue for a skate park, before settling on the proposed location. It is the case that there are very few viable alternatives. This presents the difficult problem of providing a required community facility whilst ensuring that the reasonable expectation for residential amenity is not unreasonably impacted upon.

The Council resolution of 24 November 2004 to amend the Plan of Management for Summerhayes Park to enable a skate park required that privacy fencing and advanced screen planting to the most adjacent neighbour be taken into account as part of a future development application. With the benefit of onsite consultation with the most affected residents, the proposal been amended to incorporate these elements, as well as mounding, to minimise impacts as much as possible.

In time the mature screen landscaping, fencing and mounding will assist in providing a buffer. However, it will not entirely remove the impact of such a facility in close proximity to residential properties. Beyond locating a facility elsewhere, it is considered that the proposal before the Council addresses as much as possible the impacts of a skate park in this location.

Whilst the application remains marginal, it is recommended that the Council approve the amended proposal subject to the conditions within Attachment 1.

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Attachment 1 - Conditions of development consent

- | | |
|--|---|
| Confirmation of relevant plans | 1. To confirm and clarify the terms of consent, the development shall be carried out in accordance with the plans prepared by Convic Design numbered 72003-CD01 to CD17 dated 19.09.07 and accompanying supportive documentation, except as otherwise provided or modified by the conditions of this consent. |
| Period of development consent | 2. Physical commencement of construction is required within a three year period from the date of this consent. Should this not occur, the development consent will lapse. |
| Construction certificate (building) | 3. A construction certificate is required prior to the commencement of any site or building works. This certificate can be issued either by Council as the consent authority or by an accredited certifier. |
| Building Code of Australia | 4. All building work must be carried out in accordance with the provisions of the Building Code of Australia. |
| Sydney Water Stamping of plans | 5. The approved plans must be submitted to a Sydney Water Quick Check agent or Water Servicing Coordinator to determine whether the development will affect any Sydney Water Asset's sewer and water mains, stormwater drains and/or easement, and if further requirements need to be met. Plans will be appropriately stamped.
Please refer to the web site www.sydneywater.com.au for: <ul style="list-style-type: none"> ▪ Quick Check agent details – see Building Developing and Plumbing then Quick Check; and ▪ Guidelines for Building Over/Adjacent to Sydney Water Assets – see Building Developing and Plumbing then Building and Renovating or telephone 13 20 92.
A copy of the stamped plans or other documentary evidence from Sydney Water's accredited agent demonstrating that the plans have been stamped by them is to be submitted to the Principal Certifying Authority prior to construction commencing. |
| Erosion & sediment controls | 6. To preserve the unique environment of the Blue Mountains and to contain soil and sediment on the property, controls in accordance with Council's <i>Better</i> |

Living Development Control Plan are to be implemented prior to clearing of the site vegetation and the commencement of site works. This will include:

- a). The installation of a sediment fence with returned ends across the low side of the site so that all water flows through. These shall be maintained at no less than 70% capacity at all times. Drains, gutters, roadways etc., shall be kept clean and free of sediment.
- b). To prevent the movement of soil off site, a single entry/exit point to the property shall be constructed of 40mm blue metal aggregate or recycled concrete to a depth of 150mm. The length must be at least 5 metres with the width at least 3 metres.

Soil erosion fences shall remain and must be maintained until all disturbed areas are restored by turfing, paving, revegetation.

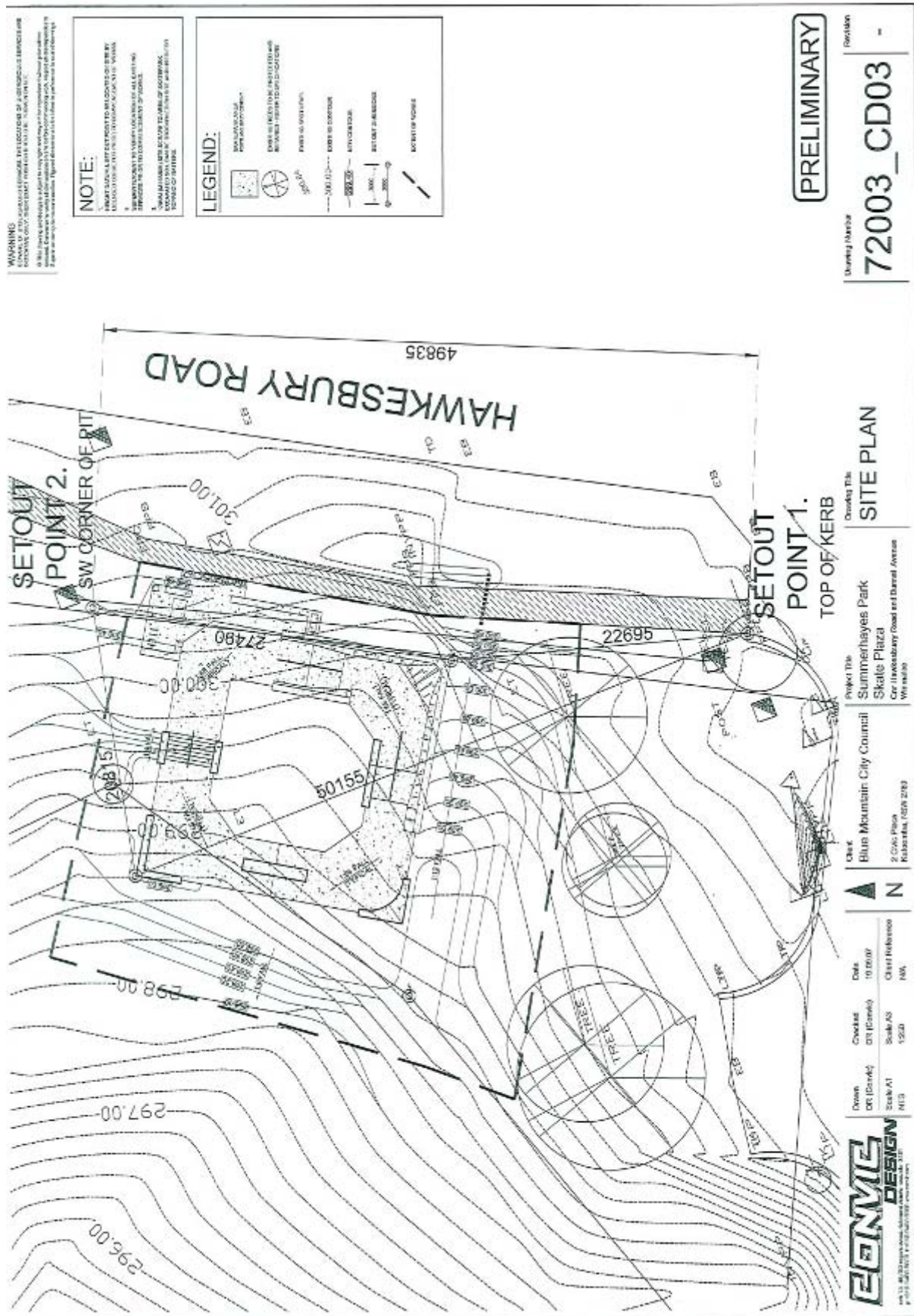
Survey report

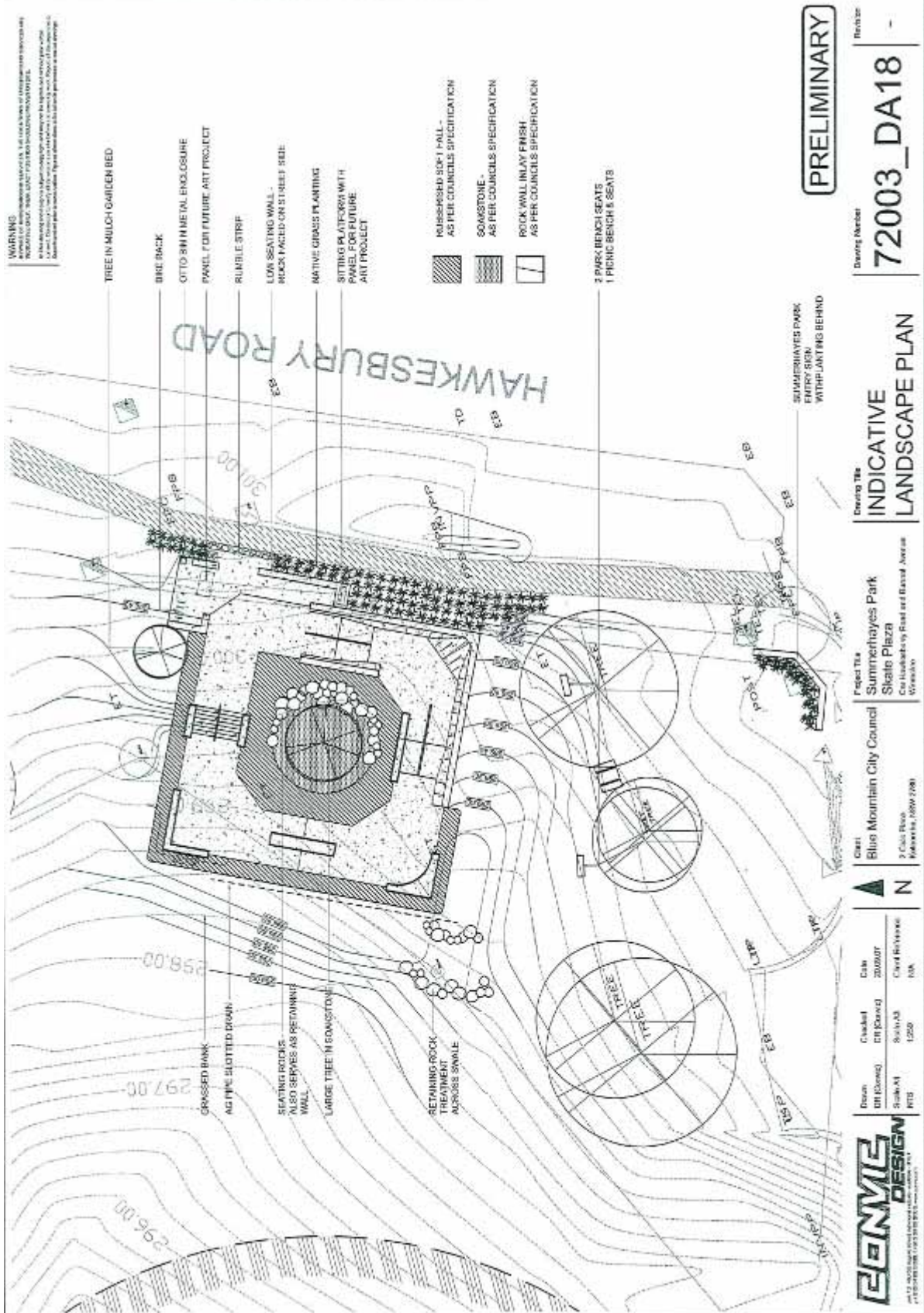
- 7. To ensure that the structure is correctly located on the property, a *survey report by a* registered Land Surveyor must be provided to the Principal Certifying Authority prior to the work proceeding beyond slab formwork.

Landscaping

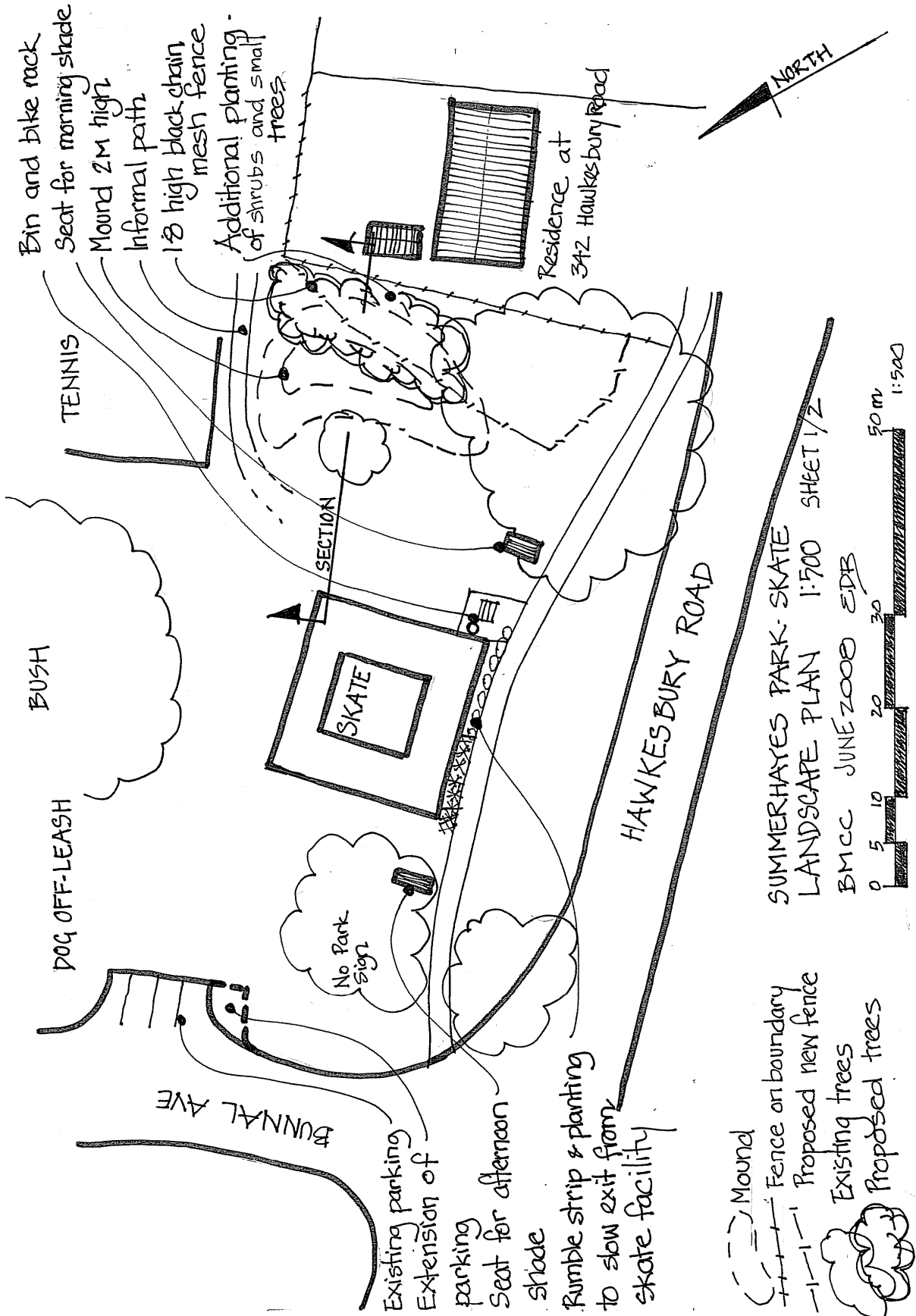
- 8. Landscaping is to be installed in accordance with the landscape plan by Convic Design, drawing number 72003-DA18, and with the supplementary earth mounding, planting and fencing landscape plan.
 - + All works shown on the landscaping plan (including fencing details) shall be installed prior to the commencement of use of the development.
 - + The supplementary planting shall be carried out to form a continuous dense screen the full length of the northern property boundary.
 - + All plants shown must be in an advanced stage of growth at the time of planting (minimum 50 litre container for trees and 25 litre container for shrubs).
 - + All plants and landscaping on the site are to be maintained at all times. Any plants that die or are removed, must be replaced with plants of the same species and of a similar stage of growth.

Attachment 2 – Plans



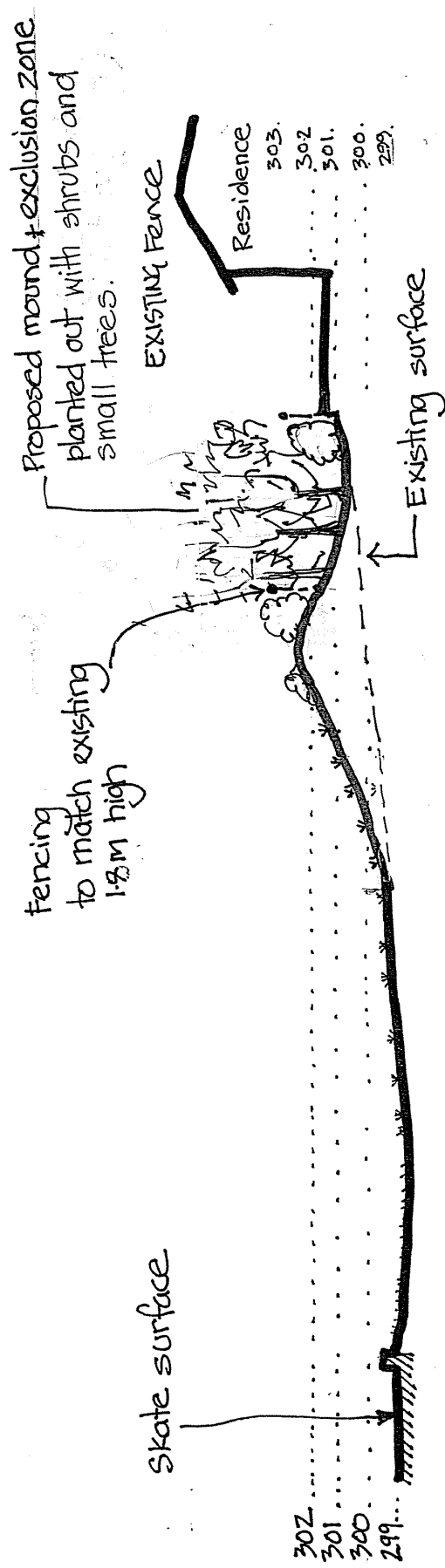


Attachment 3 – Landscape Plan



Plant selection shall be from the following list which represents plants from the shale sandstone transition list which are likely to do well in the growing conditions on site.

Allocasuarina littoralis, *Allocasuarina torulosa*, *Banksia spinulosa*, *Breynia oblongifolia*, *Bursaria spinosa*, *Dianella prunina*, *Dodonaea triquetra*, *Grevillea mucronulata*, *Hakea dactyloides*, *Hardenbergia violacea*, *Kunzea ambigua*, *Lomandra longifolia*, *Persoonia linearis*, *Poa labillardieri*, *Poa sieberiana*, *Pultenaea flexilis*, *Pultenaea villosa*, *Styphelia laeta*, *Themeda australis*,



SUMMERHAYES PARK SKATE - SECTION
 BOUNDARY TREATMENT WITH 342 HANKSBURY ROAD
 1:200 JUNE 08 EJP 2/2