

# Response to Submissions

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*Alspec Distribution Warehouse*

**Urbis staff responsible for this report were:**

Director                    Bruce Colman  
Consultant                Taylah Brito  
Project Code              P0007737  
Report Number          Final

## ***Acknowledgment of Country***

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



*The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.*

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# Executive Summary

This Submissions Report has been prepared on behalf of HB+B Property to address the matters raised by government agencies, Penrith City Council and the community during public exhibition of the proposed development at 221-235 Luddenham Road, Orchard Hills.

DPHI issued a letter to the Applicant on 18 September 2025 requesting a Response to Submissions Report for the issues raised during the public exhibition of the application.

This Submissions Report outlines the clarifications and responds to all issues raised within submissions.

## Overview of Submissions

The SSDA was on public exhibition between 21 August 2025 and 17 September 2025. A total of 10 submissions were received from NSW government agencies and Penrith City Council including:

- DPHI
- Penrith City Council
- Heritage NSW
- Transport for NSW (TfNSW)
- Department of Climate Change, Energy, Environment and Water (DCCEEW Group)
- Sydney Metro and Metro corridor protection team
- Fire Rescue NSW
- NSW Rural Fire Service
- CPHR
- Sydney Water

The key issues raised in the submissions can be broadly grouped into the following categories:

- Traffic and access.
- Noise impacts from traffic and surrounding projects.
- Alspec Industrial Business Park (AIBP) Staging
- Other environmental matters (including minor clarifications).
- Concurrent Planning Proposal for the change in height for the high bay component.

There were also six community submissions received. Only two raised issues in relation to the project and these have been addressed in this Report.

Since only a small number of submissions were received, this Submissions Report provides a response to each individual submission within Section 4.

## Actions Taken Since Exhibition

Since the SSDA was publicly exhibited, additional assessments have been prepared to respond to the issues raised within the submissions. These include:

- Updated Traffic Impact Assessment

- Updated Construction Traffic Management Plan
- Updated Waste Plan
- Updated Noise Impact Assessment
- Updated Integrated Water Cycle Management Report

## **Response to Submissions**

The updated elements have been very minor meaning that there are no significant changes to the proposal.

## **Updated Justification and Evaluation**

Section 5 of this report provides an updated project justification and evaluation.

# Introduction

This Submissions Report relates to the Alspec Warehousing Facility at 221-235 Luddenham Road, Orchard Hills (**the site**). On behalf of HB+B Property (**the Applicant**), this Submissions Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period.

The State Significant Development Application (**SSDA**) was lodged with DPHI in July 2025 (SSD-81434988). The SSDA was placed on public exhibition for 28 days between 21 August 2025 and 17 September 2025.

This Submissions Report has been prepared in accordance with the DPHI *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*.

## Exhibited Project

The SSDA seeks consent for:

- Construction of a new warehouse with a two-level ancillary office. The warehouse is predominantly 14.7 metres in height, with a high-bay warehouse component at the western portion of the building which achieves a maximum height of 39 metres.
- A total floor area of 48,157sqm; broken down as follows:
  - Warehouse area: 46,314sqm
  - Office Area: 1,843sqm
- Loading areas at the north and south sides of the warehouse, with hardstand surrounding the perimeter of the warehouse. Hardstand and carpark areas are accessed via four new driveways from the AIBP internal estate road.
- Provision of vehicular parking onsite to accommodate cars, vans, semi-trailers and B-doubles. It is envisaged that approximately 329 spaces will be provided on site within the proposed hardstand and carparking areas.
- Perimeter landscaping and tree planting with a total area of 10,134sqm (10%).

## Supporting Documentation

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Master Plan & Construction Timeframe	HB&B
Appendix B	Traffic Impact Assessment	Arcadis
Appendix C	Noise Impact Assessment	EMM
Appendix D	Construction Traffic Management Plan	Arcadis
Appendix E	Waste Management Plan	Arcadis

<b>Appendix F</b>	Bulk Earthworks Integrated Water Cycle Management Plan	Henry and Hymas
<b>Appendix G</b>	Integrated Water Cycle Management Plan	Henry and Hymas
<b>Appendix H</b>	Survey – Sydney Metro Corridor	LTS
<b>Appendix I</b>	Music Model	Henry and Hymas
<b>Appendix J</b>	Updated circulation diagram	Nettleton Tribe
<b>Appendix K</b>	Driveway widths	Nettleton Tribe
<b>Appendix L</b>	Waste clearance heights	Nettleton Tribe

# 1 Analysis of Submissions

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# 1 Analysis of Submissions

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

## 1.1 Categorising Key Issues

Since only a small number of submissions were made, a response to each individual submission is included within the Response to Submissions at **Section 4**.

The key issues raised in the submissions include:

- Traffic and access.
- Noise impacts from traffic and surrounding projects.
- Alspec Industrial Business Park (AIBP) Staging
- Other environmental matters (including minor clarifications).
- Concurrent Planning Proposal.

# **2** **Actions Taken Since Exhibition**

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## 2 Actions Taken Since Exhibition

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions.

### 2.1 Further Engagement

Since the public exhibition of the SSDA between 21 August 2025 and 17 September 2025, the issues raised did not warrant further consultation, with this Response to Submissions Report to be sent to each of the Agencies that made a submission, as well as Penrith City Council.

### 2.2 Refinements to the Project

Minor refinements and clarifications are proposed since public exhibition and in response to submissions made, and as a result of further engagement with DPHI.

Importantly, these refinements are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

### 2.3 Additional Impact Assessment

Additional assessments have been prepared to respond to the issues raised within the submissions. These include:

- Updated Traffic Impact Assessment
- Updated Construction Traffic Management Plan
- Updated Waste Plan
- Updated Noise Impact Assessment
- Updated Integrated Water Cycle Management Report

The findings and recommendation of the additional assessments are discussed in detail within Section 4 of this report.

# 3 Response to Submissions

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# 3 Responses to Submissions

Since only a small number of submissions were received during the public exhibition process, a response to each individual submission is included in the following tables.

- DPHI refer **Table 2**
- Penrith City Council refer **Table 3**
- Department of Climate Change, Energy, the Environment and Water (DCCEEW) Conservation Programs, Heritage and Regulation Group (CPHR) refer **Table 4**
- TfNSW refer **Table 5**
- Heritage NSW refer **Table 6**
- Fire and Rescue NSW refer **Table 7**
- NSW Rural Fire Service refer **Table 8**
- Sydney Metro and Metro corridor protection refer **Table 9**
- Sydney Water refer **Table 10**
- DCCEEW Water Group **Table 11**
- Community Submissions **Table 12**

Table 2 DPHI Response Tables

Summary of Issue Raised	Response	Supporting Document
<b>NSW Department Of Planning, Housing and Infrastructure</b>		
<p>1. The Submissions Report must identify and detail the relationship and timing of this development in relation to other related infrastructure and development applications. A staging plan for the Alspec Industrial Business Park must be submitted, clearly outlining the indicative timing for site establishment, intersection upgrades, and infrastructure provision, as well as other developments to be undertaken via separate development applications.</p>	<p>A staging plan has been submitted with the Estate Master Plan. This shows the timing of each of the Development Applications submitted to date, as well as key infrastructure such as the Patons Lane / Luddenham Road upgrade and the Southern Intersection upgrade.</p>	<p>Appendix A</p>
<p>2. The staging plan must also show the duration of construction for other developments. Any technical assessments (such as traffic studies) must be updated to reflect any changes in timing, ensuring that traffic assessments account for interim arrangements if intersection works are not completed at the start of operations.</p>	<p>The construction timefarme reflects the timing of all key Infrastructure. This timing is reflected in the Traffic Impact Assessment. The Patons Lane / Luddenham Road upgrade will be in operation prior to the occupation of this warehouse.</p>	<p>Appendix A (Construction Pogram) and Appendix B (Traffic Impact Assessment)</p>
<p>3. The Department notes a Planning Proposal is currently being considered by Penrith City Council relating to building height limits on the site. The Submissions Report should not be formally submitted until the relevant Planning</p>	<p>The Planning Proposal was considered by Penrith City Council on the 27<sup>th</sup> October 2025. It received approval to proceed to the Department of Planning, Housing and Infrastructure for Gateway Conditions to allow it to go on exhibition. The Department issued a Gateway Determination on 14<sup>th</sup></p>	

Summary of Issue Raised	Response	Supporting Document
<p>Proposal has commenced public exhibition / gained gateway determination. Should the Planning Proposal not proceed, the Department strongly encourages the proposed height of the warehouse be reconsidered.</p>	<p>November 2025. Council placed the Planning Proposal on exhibition from 27th November 2025 to 14<sup>th</sup> January 2026.</p>	
<p><u>Traffic Impact Assessment</u></p> <p>4. The application states that the largest vehicle proposed using the site will be B-Double heavy vehicles. However, it is noted that neither Luddenham Road nor Patons Lane are approved B-Double routes. Please clarify this matter.</p>	<p>Prior to the operation of the warehouse, the applicant will engage in consultation with NHVR and Penrith City Council to assess the feasibility and requirements for B-Double access.</p> <p>If necessary following consultation, an application for a B-Double permit for Luddenham Road and Patons Lane will be submitted to the NHVR to ensure compliance with all regulatory standards and access protocols.</p>	
<p>5. Table 5-1 in the Traffic Impact Assessment (TIA) states that there will be 110 B-doubles, 123 Semi-trailers and 112 Rigid delivery vans making two way movements (in and out) of the site during peak hours. It is noted that section 5.4 of the TIA states that the default model parameters were adopted for the intersection models. Please confirm that the proposed breakdown of heavy vehicles listed above has been used in the SIDRA modelling of intersection impacts to accurately predict queue lengths and delays, and update the assessment accordingly if required.</p>	<p>The proposed breakdown of heavy vehicles for the cumulative operational assessment has been considered in the TIA. SIDRA modelled scenarios have been modelled to show the breakdown of light, heavy vehicles, and large trucks (to capture larger expected heavy vehicles such as B-doubles).</p>	<p>Appendix B (Traffic Impact Assessment) Section 5</p>

Summary of Issue Raised	Response	Supporting Document
<p><u>Noise Impact Assessment</u></p> <p>6. Please confirm that the hourly distribution and composition of heavy vehicle movements used in the Noise Impact Assessment (NIA) (Table 5.6) is consistent with the peak operational traffic profile in the TIA (Figure 5-1). In particular, clarify whether the night-time period (1:00 am–5:00 am) accounts for B-double movements that may be concurrently loaded or unloaded. If there are discrepancies, provide justification or update the noise model to reflect the worst-case scenario.</p>	<p>The assumptions for hourly distribution of heavy vehicles, based on information supplied by the client are consistent between the NIA and TIA. Section 2.6 of the NIA provides assumptions for heavy vehicle movements. There is no overlap of B-Double and semi-trailer movements between 9pm and 5am. Between 1am – 5am only semi-trailers are anticipated and these movements (14) have been assessed as a worst case night impact for the NIA as per Table 2.2 and 5.6.</p>	<p>Appendix C (Noise Impact Assessment) Section 2.6</p>
<p>7. Additional information is required to demonstrate that the noise model reflects the development's worst-case operating conditions for each assessment period. This should include simultaneous loading and unloading of multiple semi-trailers and B-doubles, forklift activity (including reversing alarms) on the external hardstand at a rate consistent with the assumed truck throughput, and potential noise breakout through the high-bay building fabric, translucent roof panels, and open roller shutters. Loading dock utilisation rates must also be specified. Mechanical plant and equipment should be represented using either tender specifications</p>	<p>A worst case 15 min scenario has been developed including all significant noise sources based on information provided by the client and a site visit to an existing storage and distribution warehouse operated by the same client. The site visit (discussed in Section 2.4 of the NIA) identified that:</p> <ul style="list-style-type: none"> <li>▪ Heavy vehicle movements and forklifts were identified as the primary noise source</li> <li>▪ Noise levels within the storage warehouse were relatively low and not measurable on hardstand areas with roller doors open</li> <li>▪ Automated systems including skate docks, conveyor systems and automated storage and retrieval systems were noted as insignificant noise contributors</li> <li>▪ Trucks were noted as generally being shutdown while being loaded/unloaded.</li> </ul>	<p>Appendix C (Noise Impact Assessment) Section 2.4 and Table 5.6</p>

Summary of Issue Raised	Response	Supporting Document
<p>(which were not available in the NIA) or conservative assumptions if flexibility is required. If any of these elements have been excluded, please provide a quantitative justification and, where relevant, a sensitivity analysis</p>	<ul style="list-style-type: none"> <li>▪ Automated systems operate with significantly lower noise impact than traditional manual handling including forklifts, and also reduce the need for intensive use of forklifts.</li> </ul> <p>Forklift and heavy vehicle numbers assessed are detailed in Table 5.6 of the NIA. These numbers represent a potential worst-case 15 minutes for each assessment period based on information provided by the client.</p> <p>As detailed in Section 5 of the NIA, Forklifts have been assessed operating on hardstand areas with 100% utilisation. Each B-double, semi-trailer and rigid van has been assessed traveling to hardstand areas, manoeuvring into position and idling for 5 minutes prior to arrival or departure. The sound power used to assess trucks and forklifts is representative of typical operation in hardstand areas and is inclusive of manoeuvring and reverse alarms.</p> <p>A plant room and roof top ventilation has been assessed as per the sound power data provided in Table 5.5 of the NIA. Detailed tender information is not available at the time of this assessment and has been based on representative data from a similar size warehouse in the area.</p>	
<p><b>8.</b> The noise source inventory must be based on verifiable data and clearly identify, for each source, its:</p> <ul style="list-style-type: none"> <li>▪ duration of noise emission (e.g. movement alarm usage, vehicle speed, loading/unloading time for semi-trailers and B-doubles)</li> <li>▪ quantity (e.g. number of concurrently loaded/unloaded heavy vehicles, number of</li> </ul>	<p>Worst case 15 min scenario has been developed including all significant noise sources based on information provided by the client and a site visit to an existing storage and distribution warehouse operated by the same client.</p> <p>Forklift and heavy vehicle numbers assessed are detailed in Table 5.6 of the NIA. These numbers represent a potential worst-case 15 minutes for each assessment period based on information provided by the client.</p> <p>As detailed in Section 5 of the NIA, Forklifts have been assessed operating on hardstand areas with 100% utilisation. Each B-double, semi-trailer and rigid van has been assessed traveling to hardstand areas at 10km/hr,</p>	<p>Appendix C (Noise Impact Assessment) Table 5.6</p>

Summary of Issue Raised	Response	Supporting Document
<p>forklifts required to load/unload semi-trailers and B-doubles)</p> <ul style="list-style-type: none"> <li>▪ likelihood of simultaneous operation with other activities</li> <li>▪ LAeq,15min sound power level, LAmax sound power level and other relevant emission characteristics.</li> </ul>	<p>manoeuvring into position and idling for 5 minutes prior to arrival or departure. The sound power used to assess trucks and forklifts is representative of typical operation in hardstand areas and inclusive of manoeuvring and reverse alarms.</p>	
<p>9. All noise parameters and user-adjusted variables must be identified and justified in accordance with Section 3.3 of the NPfI. The noise source inventory and propagation variables should be presented in a table format, and the spatial layout of noise sources, receptors, and barriers illustrated using plan, elevation, or 3D perspective views. For point, line, and area sources, sound power levels should be expressed as dB(A), dB(A)/m, and dB(A)/m<sup>2</sup> respectively.</p>	<p>All operational noise parameters used in modelling are provided and justified in Section 5 of the NIA. Noise model inputs are provided in Table 5.1 of the NIA.</p> <p>A model source location diagram has been added to Appendix B of the NIA (E241141_RP1_Lot11_NVIA_V3)</p>	<p>Appendix C (Noise Impact Assessment) Table 5.1 &amp; Appendix B of the Noise Impact Assessment.</p>
<p>10. The cumulative operational noise impact assessment must consider Condition 29 of DA24/0294 (Integrated Development for Bulk Earthworks and Community Title Subdivision).</p>	<p>Cumulative noise impact for the AIBP has been assessed in Section 5.4.10 of the NIA. This assessment considers Condition 29 of DA24/0294.</p> <p>Noise predictions from Lot 11 has been compared with the corresponding lot from the masterplan assessment. Lot 11 occupies the area previously presented as WH8 and WH9 in the masterplan assessment, so results have been compared to the combined noise levels from these two lots.</p>	<p>Appendix C (Noise Impact Assessment) Section 5.4.10</p>

Summary of Issue Raised	Response	Supporting Document
	<p>Noise predictions for Lot 11 were the same or less than the masterplan assessment for NCA1, NCA2 and R15. Noise predictions for NCA3 were up to 4 dB higher than the masterplan.</p> <p>A change to the orientation of the proposed Lot 11 results in heavy vehicle impacts being lower for NCA1 and NCA2 but higher for NCA3 (R24). While there is an increase in predicted noise impact for NCA3 (R24) amenity levels at this location for the entire masterplan remain in compliance with noise targets.</p>	

Table 3 Council Response Table

Summary of Issue Raised	Response	Supporting Document
<b>Penrith City Council</b>		
<b>11. Planning Considerations</b>		
<p>The Environmental Impact Statement (EIS) mentions previous approvals that benefit the site in which the development relies upon for servicing. The approvals include the following:</p> <ul style="list-style-type: none"> <li>DA24/0294 Community Title super lot creation and site preparation works including bulk</li> </ul>	<p>Noted. There are earlier local Development Applications for the site which have now been approved. The most significant of these is the Bulk Earthworks application DA24/0294 which has enabled the preparatory works for the site to be undertaken. These preparatory works will be complete prior to the occupation of the warehouse.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>earthworks, stormwater management infrastructure, flood storage basins and a collector road,</p> <ul style="list-style-type: none"> <li>▪ DA24/0654 construction and operation of a sewage treatment plant to service the Alspec Industrial Business Park (to be endorsed by IPART),</li> <li>▪ DA24/0330 construction and operation of a warehouse and distribution centre with a specialised tenant (with temporary sewage pump out), and</li> <li>▪ DA24/0677 construction and use of a warehouse and distribution centre (speculative tenant).</li> </ul> <p>Furthermore, the site is subject of the following Development Applications currently being considered by Council and other authorities:</p> <ul style="list-style-type: none"> <li>▪ Alspec Manufacturing SSD, and</li> <li>▪ DA25/0318 construction of a Left-In/Left-Out unsignalised intersection from Luddenham Road.</li> </ul> <p>The site is also subject of a Voluntary Planning Agreement between Council and the developer which includes provision for external road network upgrades including the construction of a signalised intersection between Patons Lane and Luddenham Road and a round-a-bout at Patons Lane and the</p>		

Summary of Issue Raised	Response	Supporting Document
<p>Collector Road. The timing of the above-mentioned works is prior to the issue of an Occupation Certificate (as well as other milestones for other VPA obligations).</p> <p>The Departments attention is drawn to the above, it shall be ensured that the required servicing (including but not limited to – ultimate stormwater management and treatment measures, Collector Road, external road upgrades and sewage management facilities) is available to the development at the relevant time. In addition, DA24/0294 seeks to prepare the land for development, therefore, the timing of these works will also need to be considered.</p>		
<p>DA24/0294 includes the subdivision of the subject land by way of Community Title Subdivision. The DA24/0294 consent conditions require encumbrance to be registered on the title of the future lots. Considering the land is yet to be subdivided the encumbrances are not yet on title. The Department is encouraged to review the DA24/0294 consent conditions to ensure consistency with the proposal, in particular the following conditions are mentioned:</p> <ul style="list-style-type: none"> <li>▪ Condition 29 – includes provisions for Noise Impact Assessments to be provided which assesses consistency with individual lot contributions from the approved cumulative</li> </ul>	<p>The three conditions will be included within the Community Title scheme. These conditions have been taken into consideration in the development of the warehouse. The warehouse proposal is consistent with these conditions.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>Noise Impact Assessment. Should exceedances from the individual lot contributions be found then a new cumulative assessment is required.</p> <ul style="list-style-type: none"> <li>▪ Condition 90 – requires suitable sewerage services to be available as well as required easements, covenants, restrictions and management schemes to be in place for its sufficient operation.</li> <li>▪ Condition 91 – requires development to demonstrate the lot yield within Clause 7.24 of Penrith Local Environmental Plan 2010 can be achieved.</li> </ul>		
<p>Council’s City Planning Team is currently reviewing an amendment sought to Chapter E18 Luddenham Road Industrial Business Park of Penrith Development Control Plan 2014 which seeks to include a concept masterplan in address of Clause 7.24 provisions of Penrith Local Environmental Plan 2010.</p>	<p>The proposed amendment outlines a total lot yield for the Alspec Industrial Estate. This lot yield has been taken into account in the design of the warehouse application.</p>	
<p>The Department is encouraged to consider northern boundary retaining wall impacts on plantings endorsed under DA24/0330. The timing of planting will need to be considered and ability for plantings to grow to potential.</p>	<p>The proposed northern boundary retaining wall and associated landscape treatment are consistent with details previously prepared and approved across other stages of the estate and were developed in consultation with the project structural and civil engineers.</p>	

Summary of Issue Raised	Response	Supporting Document
	<p>The precast sleeper wall incorporates an adjacent root barrier to prevent root intrusion and to protect both the wall structure and the long-term health of the plantings. The construction sequence adopted (wall installed first, backfilled, followed by soil conditioning and planting) ensures that trees are established in uncompacted, engineered soil with the necessary depth and quality to support long-term growth.</p> <p>While the planting zone varies between 3 metres and 4 metres in width, the continuous linear extent of the garden bed provides adequate soil volume for selected species to achieve a substantial proportion of their mature height and canopy spread.</p> <p>Accordingly, the proposed design provides planting areas capable of supporting long-term canopy development, consistent with the intent of the landscaping approved under DA24/0330. Refer to Detail 04 on Drawing SSD-15.</p>	
<p>The canopy coverage parking provisions have not considered the heavy rigid parking location at the western boundary of the site. Tree planting should be considered in this location to provide shade across the car park and cool the western elevation of the building which will be exposed to afternoon sun.</p>	<p>Tree planting within the western HRV parking area is not recommended. Any species capable of providing meaningful canopy coverage would be at high risk of damage due to heavy rigid vehicle (HRV) manoeuvring, including root disturbance from wheel loads, soil compaction, and branch breakage from vehicle clearances.</p> <p>This design approach is consistent with other approved stages of the estate, where tree planting has intentionally not been incorporated within HRV parking bays for the same operational and safety reasons.</p> <p>Shade and heat-mitigation for the western elevation are instead achieved through building design measures and the adjacent landscape treatments located outside the HRV movement zone, rather than planting trees between HRV bays where long-term survival and compliance cannot be ensured.</p>	

Summary of Issue Raised	Response	Supporting Document
<b>12. City Planning Considerations</b>		
<p><u>Voluntary Planning Agreement – Luddenham Road, Orchard Hills (VPA)</u></p> <p>The Voluntary Planning Agreement – Luddenham Road Orchard Hills (VPA) as executed on 14 May 2024 applies to the development subject to this SSD. The following must be considered in assessment of this SSD and preparation of suitable conditions prior to consent:</p> <p><i>Clause 11.2 – Security</i></p> <ul style="list-style-type: none"> <li>a. Under clause 11.2(c), prior to the issue of any Construction Certificate or Subdivision Works Certificate for any part of the Development approved by a consent granted under the Act, the Developer must provide to the Council Security in an amount equivalent to 125% of the agreed value of the Works.</li> <li>b. In this clause, Security means a Bank Guarantee or Bond.</li> <li>c. In line with the above, a suitable condition must be provided within the consent, prior to determination, consistent with Clause 11.2.</li> </ul>	<p>HB+B is working with Council on the implementation of the Voluntary Planning Agreement.</p>	
<p><i>Clause 11.4 – Restriction on the issue of Certificates</i></p> <ul style="list-style-type: none"> <li>a. Reference to the requirements of clause 11.4 must be considered to inform suitable conditions prior to issuing consent, in particular</li> </ul>	<p>HB+B is progressing the works items specified in the Voluntary Planning Agreement.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>timing triggers for all works items within Schedule 1 – Contributions table (Attachment A to the end of this memo).</p>		
<p><i>Clause 7 – Application of s7.11 and s7.12 of the Act</i></p> <p>a. Under clause 7(a) of the VPA, the application of 7.11 Contributions under the Environmental Planning and Assessment Act 1979 (EP&amp;A Act) are excluded.</p> <p>b. Under clause 7(b) of the VPA, section 7.12 contributions under the EP&amp;A Act are not excluded and still apply to the development subject to this SSD.</p>	<p>Local contribution payments have been taken into account in the preparation of this application.</p>	
<p><u>Applicable Development Contribution Plans – Penrith City Section 7.12 Development Contributions Plan 2020 (as amended)</u></p> <p>a. In accordance with the above, the Penrith City Section 7.12 Development Contributions Plan 2020 (as amended) applies to the development subject to this SSD at a rate of 1% calculated against the proposed cost of works.</p>	<p>The applicability of Council’s 7.12 Contributions Plan has been taken into account in the preparation of this application.</p>	
<p>b. In line with the proposed cost of works provided in Appendix S – EDC being \$171,807,325 (excluding GST) the contributions applicable to this development under the CP equate to approximately \$1,718,073.25 (excluding GST). Prior to consent of the SSD, the final cost of</p>	<p>Noted. The final cost of works will be provided to Council.</p>	

Summary of Issue Raised	Response	Supporting Document
works must be provided to Council for preparation of a development contributions quote to inform conditions of consent.		
<p><u>Planning Proposal (PP-2025-1360) to amend the Height of Buildings Map under Penrith Local Environmental Plan 2010 (Penrith LEP 2010)</u></p> <p>a. The SSD proposes a high bay warehouse of 39 metres, which exceeds the current maximum building height of 24 metres under Penrith LEP 2010. To facilitate this, it is noted that the applicant has lodged Planning Proposal PP-2025-1360 seeking to amend the Height of Buildings Map to permit up to 40 metres on part of the site.</p>	Noted. HB+B is working with Council on the Planning Proposal to amend the Height of Buildings map to allow the High Bay component of the proposal. The Planning Proposal had been supported by the Local Planning Panel. It was endorsed by Council on the 27 <sup>th</sup> October 2025 to proceed to DPPI for a Gateway Determination. The Planning Proposal has received a Gateway Determination from the Department of Planning and is on exhibition from 27 <sup>th</sup> November 2025 to 14 <sup>th</sup> January 2026.	
<p>b. The Luddenham Road VPA, executed in May 2024, is linked to the Planning Proposal (PP-2022-1052) that rezoned the site and introduced the current height control of 24 metres. As noted in Section D of PP-2025-1360 a minor amendment to the VPA will be required to update the definition of "Instrument Change" so it captures the proposed height amendment.</p>	Noted. Council has subsequently informed HB+B that an amendment to the VPA is no longer required.	
<p>Comments:</p> <p>a. The SSD, in its current form, is not consistent with the existing LEP controls. Progression therefore depends on the outcome of the</p>	Noted. It is recognised that a Planning Proposal is currently under assessment.	N/A

Summary of Issue Raised	Response	Supporting Document
<p>Planning Proposal process, which remains under assessment by Council and subject to a Gateway determination and exhibition.</p>		
<p>b. Should the Planning Proposal ultimately be supported and finalised, a consequential amendment to the VPA would be required to align its terms with the updated Instrument Change.</p>	<p>Noted. Council has subsequently informed HB+B that an amendment to the VPA is no longer required.</p>	
<p>c. DPHI should ensure that any determination of the SSD appropriately accounts for the status of the Planning Proposal and need for VPA consistency.</p>	<p>Noted. The SSD is progressing in parallel with the Planning Proposal assessment.</p>	
<p><b>13. Development Engineering Considerations</b></p>		
<p>It is noted that the subdivision DA which created the lots (DA24/0294) includes the delivery of earthworks and civil infrastructure has been approved and the subject proposal is mostly consistent with the overall design. Council's Development Engineering Department have reviewed the documents and raise no objections to the proposal, subject to the following matters are conditioned or addressed:</p> <p>a. The egress of heavy vehicles is designed in manner that two trucks could potentially be leave simultaneously creating conflict as they cross each other's travel path during the</p>	<p>a) The current weighbridge location is the most appropriate and operationally safe arrangement for the site.</p> <p>Shifting the weighbridge further west would introduce additional conflict with truck movements exiting the northern loading dock face and the keg drop-off area. This would create a less efficient and potentially less safe internal circulation outcome than the current arrangement.</p> <p>Given that simultaneous egress events are expected to be infrequent, operational traffic controls will be implemented to manage any potential conflict between the weighbridge exit and the outbound lane. This will include the installation of give-way line marking and/or a boom</p>	

Summary of Issue Raised	Response	Supporting Document
<p>manoeuvre on to the public road. It is recommended that the weighbridge is relocated further west within the site to allow space for the formation of a single travel lane at the exit driveway.</p> <p>b. S138 Roads Act approval is to be obtained from the Roads Authority for any works within the public road reserve. Applicable bonds are to be paid to Council as required for the S138 Roads Act approval. A suitable condition to be provided accordingly.</p> <p>c. A suitable condition is to be provided for the delivery of external road works are per the VPA prior to the issue of the first OC. This has been mentioned previously in this letter.</p>	<p>gate at the weighbridge exit to ensure clear priority and safe movement during peak or coincident truck manoeuvres.</p> <p>b) Noted</p> <p>c) Noted</p>	
<p><b>14. Traffic Engineering Considerations</b></p>		
<p>a. Notice to Transport for NSW and Sydney Metro is recommended. Previous development applications have been referred to Transport for NSW and Sydney Metro and they have extensively commented on the impacts of the construction traffic which is still relevant to the subject site.</p>	<p>Noted. Both Transport and Sydney Metro have made submissions on the application. HB+B has maintained regular and consistent contact with Sydney Metro on all the applications relating to the site and the wider business park.</p>	
<p>b. The civil plans are not of sufficient detail (dimensions not provided for assessment purposes) to assess whether compliance with AS2890.2 has been demonstrated regarding</p>	<p>The access driveway widths for the car park and hard stand are compliant with AS2890.1 and AS2890.2. Dimension have been provided on the updated Architectural Warehouse General Arrangement Plan (14291_DA010).</p>	<p>Appendix K</p>

Summary of Issue Raised	Response	Supporting Document
<p>any proposed truck entry/exit driveways and heavy vehicle parking and with AS2890.1 in regard to car parking areas. The Department should review this component to ensure suitable vehicle movements and parking can be achieved.</p>		
<p>c. Any internal driveway access gates/boom-gates/etc. must be positioned internally such that a full vehicle length (of the largest vehicle designated to use the corresponding entrance) can be accommodated wholly within the site and not queue on the public roadway. It is not clear from the application whether this has been achieved.</p>	<p>There is approximately 31m between the driveway access boom gates and the road reserve. This is sufficient for the largest vehicle accessing the site (b-double). Appendix B of the TIA has an outline of a B double at the boom gate demonstrating it is wholly contained within the site.</p>	<p>Appendix B (Traffic Impact Assessment) Appendix B</p>
<p>d. The Department should seek clarification for the Traffic Management Plan noting provision of construction parking spaces and access to the development location.</p>	<p>An indicative construction parking area has been provided within the CTMP. This is to be confirmed and updated if required upon appointment of a construction contractor. Access will be in accordance with the site access arrangements as outlined in the CTMP.</p>	<p>Appendix D (Construction Traffic Management Plan) Section 3</p>
<p><b>15. Environmental Management</b></p>		
<p><u>Chapter 4 of SEPP (Resilience and Hazards) 2021</u> The consent for DA24/0294 requires unexpected finds to be addressed by an appropriately qualified consultant in accordance with the 'Bulk Earthworks Phase Unexpected Finds of Contamination in Soil</p>	<p>Noted – All bulk earthwork activities will have been completed prior to commencement of the works of this application. All unexpected finds (if any) will have been managed under the DA24/0294 works.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>Management Protocol' (Doc Ref: 10791EV.P.68-R09). Subsequent DA's granted Council consent have also required unexpected finds to be dealt with in accordance with this protocol. The Unexpected Finds Protocol commits to the remediation of any unexpected finds, should they occur, by removal of any identified contamination, and off-site disposal.</p>		
<p><u>Noise</u></p> <p>Development consent (DA24/0294) for the AIBP bulk earthworks and subdivision imposes the following condition (number 29):</p> <p>a. Prior to the issue of the Subdivision Certificate, a positive covenant is to be registered against each new land title/Lot that refers to the 'Noise Impact Assessment (Ref: E230918 RP2 version 3)' prepared by EMM and dated 20 February 2025 (the EMM Report).</p> <p><i>The covenant is also to:</i></p> <ol style="list-style-type: none"> <li>i. reference 'Appendix A Individual Lot Contributions' of the EMM Report,</li> <li>ii. provide advice on the requirement to prepare a Noise Impact Assessment Report (prepared by a suitably qualified acoustic consultant) to determine the design and construction measures required to minimize noise impacts from future</li> </ol>	<p>Cumulative noise impact for the AIBP has been assessed in Section 5.4.10 of the NIA. Noise predictions from Lot 11 has been compared with the corresponding lot from the masterplan assessment. Lot 11 occupies the area previously presented as WH8 and WH9 in the masterplan assessment, so results have been compared to the combined noise levels from these two lots.</p> <p>Noise predictions for Lot 11 were the same or less than the masterplan assessment for NCA1, NCA2 and R15. Noise predictions for NCA3 were up to 4 dB higher than the masterplan.</p> <p>A change to the orientation of the proposed Lot 11 results in heavy vehicle impacts being lower for NCA1 and NCA2 but higher for NCA3 (R24). While there is an increase in predicted noise impact for NCA3 (R24) amenity levels at this location for the entire masterplan remain in compliance with noise targets.</p>	<p>Appendix C (Noise Impact Assessment) Section 5.4.10</p>

Summary of Issue Raised	Response	Supporting Document
<p>development (built form and operational activities),</p> <p>iii. <i>provide advice that Development Applications submitted to Penrith City Council for development of individual Lots are to include a Noise Impact Assessment Report (prepared by a suitably qualified acoustic consultant) demonstrating an ability to achieve the noise criteria established within the EMM Report. Where a proposed development exceeds the individual lot contribution detailed in Appendix A of the EMM Report, a Cumulative Noise Impact Assessment is required to be submitted with the Development Application, that provides an updated review of the EMM Report, in accordance with the NSW EPA Noise Policy for Industry, and that assesses and justifies the proposed exceedance in consideration of the cumulative impact of development of the Alspec Industrial Business Park as a whole.</i></p> <p><i>The authority recorded as empowered to vary, modify or extinguish the positive covenant is to be Penrith City Council.</i></p> <p>The condition requires that for development applications submitted to Council, where a</p>		

Summary of Issue Raised	Response	Supporting Document
<p>proposed development exceeds the individual lot contribution detailed in Appendix A of the EMM Report, an updated Cumulative Noise Impact Assessment is required to be submitted with the DA, that assesses and justifies the proposed exceedance in consideration of the development of the AIBP as a whole. Should consent be granted for the warehouse subject to this SSD, with exceedance of the lot contribution allocated to warehouses 8 &amp; 9, an updated cumulative noise impact assessment will be required to support future DA's to Council, confirming allocated lot contributions considerate of the exceedance.</p>		
<p>In terms of road traffic noise resultant of the proposed Lot 11 warehouse, whilst this warehouse is not anticipated to singularly increase existing road traffic noise levels by more than 2dB, operation of the overall AIBP is predicted to exceed this criteria. It is anticipated that this issue shall be addressed during assessment of the future DA that is required to be submitted to Council for construction of the Paton's Lane/Luddenham Road intersection. At that stage, detailed road traffic assessment shall occur which will consider the road traffic generated by the proposed Lot 11 warehouse, in the context of the overall operation of the AIBP.</p>	<p>EMM is preparing a road traffic noise assessment, which will be included in the forthcoming Patons Lane / Luddenham Road upgrade Local Development Application.</p>	

Summary of Issue Raised	Response	Supporting Document
<p><u>OSSM/Wastewater</u></p> <p>a. Consent for DA24/0294 (condition number 90) imposes requirements for the application of a positive covenant upon each individual Lot, that imposes the following restriction:</p> <p>i. Prior to the issue of a Subdivision Certificate, the linen plan shall be accompanied by an 88B instrument creating a Restriction on the use of the land, applicable to all lots, for the following purpose.</p> <p>(1) No wastewater generating development shall be permitted on the lot/s until the following has been satisfied:</p> <ul style="list-style-type: none"> <li>• An agreed arrangement for sewerage services is available,</li> <li>• The required easements, covenants and restrictions have been imposed on the lots (both the benefitting and burdened lots) relying on the agreed sewerage service, and</li> <li>• The Community Title Association Management Scheme is in place to address the ongoing maintenance and responsibility for the agreed sewerage management arrangement/system.</li> </ul>	<p>HB+B is currently working with IPART on the WICA licence application. The waste water needs of this warehouse have been included in the overall scheme approval process.</p>	

Summary of Issue Raised	Response	Supporting Document
<p><i>Council shall be nominated as the only authority permitted to modify, vary or extinguish such restrictions.</i></p> <p>Development Application DA24/0654 consents to the construction and use of an on-site sewage management system. Construction and operation of the system is dependent upon a Water Industry Act Scheme Approval being issued by IPART. This SSD application informs that the applicant is in the process of seeking the required Water Industry Competition Act (WICA) approval. In determining applications, DPHI and Council will need to ensure that development of each Lot is not inconsistent with the WICA application currently being assessed by IPART, and that there is a mechanism to capture any issues or concerns identified by IPART during the WICA application process. As development of the AIBP proceeds and the IPART assessment process progresses, it needs to be ensured that approvals under each legislative pathway are aligned and not inconsistent in terms of required wastewater infrastructure design and provision.</p>		
<p><b>16. Biodiversity and Wider Considerations</b></p>		
<p>As this is state significant development, Council notes that the Department is the assessment and consent authority for the application. If the proposal is given a favourable determination by the consent authority, Council requests that no</p>	<p>Noted.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>condition of consent is imposed that requires an Applicant to consult with Council where the need for an assessment of suitability, or a determination of condition compliance, is specifically the responsibility of the consent authority except where there is a legislative requirement (such as the need for a s68 application under the Local Government Act 1993) or where specifically requested by Council. This is because the SSD/SSI policy framework has removed Council from an assessment or determination function and by doing so, all assessment functions must be undertaken by the empowered assessment and consent authority being the Department. This can be varied when consultation relates specifically to the design and location of infrastructure or works that are intended to be dedicated or transferred into Council's ownership.</p>		
<p><b>17. Waterways Considerations</b></p>		
<p>The Department shall consider the requirements for the below documents/detail to inform holistic assessment of the application.</p> <p>a. The electronic version of the MUSIC model has not been provided for independent review.</p> <p>b. Draft Operation and Maintenance manual should also be provided for the proposed stormwater treatment measures.</p>	<p>a) The MUSIC model has been supplied with this submission.</p> <p>b) Operation and Maintenance model will be included in the Integrated Water Cycle Management Report</p> <p>c) MARV calculations were provided in the subdivision works. Refer to 19221 Alspec Industrial Buisness Park – Integrated Water Cycle Management and Civil Engering Report. This development complies with the findings in this report.</p>	<p>Appendix I (Music Model)</p>

Summary of Issue Raised	Response	Supporting Document
<p>c. No MARV calculations have been provided and independent review. Councils DCP requires the MARV annual runoff targets to be achieved.</p>		
<p><b>18. Waste Management Considerations</b></p>		
<p><u>Warehouse Waste Generation Rates</u></p>		
<p>a. The waste generation rates currently proposed for the warehouse component appear to be underestimated and based on office use within a warehouse environment rather than specific rates relating to actual anticipated use. The Department should be satisfied that any revised waste generation rates requested for review reflect the anticipated operational use of the warehouse. Accurate projections are necessary to ensure that the frequency of waste collection and the sizing of waste infrastructure (bins, storage rooms, etc.) are appropriate for the scale and nature of activities in the warehouse.</p>	<p>Noted, the WMP warehouse waste generation rates have been updated, adopting rates based on data from previous similar developments operating as a storage and distribution facility.</p> <p>Garbage and Recycling waste generation has been considered to be 30L/day for the main warehouse operation (no change to the warehouse(office) generation rates, these have remained to align with the Penrith DCP E18).</p>	<p>Appendix E (Waste Management Plan) Section 5.1</p>
<p><u>FOGO Waste Diversion Requirements</u></p>		
<p>a. Food Organics and Garden Organics (FOGO) waste generated by the facility must be directed to an appropriately licensed processing facility and not sent to landfill. It is important to note that, effective July 2026, the FOGO mandate will apply to relevant businesses. It is recommended that the</p>	<p>The WMP has been updated to address the NSW EPA FOGO mandate effective July 2026 and associated waste management measures.</p>	<p>Appendix E (Waste Management Plan)</p>

Summary of Issue Raised	Response	Supporting Document
<p>Department request the waste management strategy outline the mechanisms for separating, storing, transporting and processing FOGO waste in accordance with this mandate, including contracts or arrangements with licensed processors.</p>		
<p><u>Integrated Waste Collection Room</u></p> <p>a. To enhance external amenity and streamline waste management operations, the Department should consider the inclusion of an integrated waste collection room. This space will also facilitate the storage of the required bins and reduce the risk of odours or pest attraction. The room should be designed with adequate ventilation, accessibility for collection vehicles, and sufficient capacity to accommodate all waste streams generated on-site.</p>	<p>The tenant proposes to retain external waste storage and collection in a designated hardstand area, as supported by operational requirements and relevant NSW EPA and Council guidelines for industrial developments. The external waste area will be:</p> <ul style="list-style-type: none"> <li>▪ Located and screened to minimise visual impacts and maintain external amenity.</li> <li>▪ Constructed with an impermeable surface, bunded, and drained to prevent environmental harm.</li> <li>▪ Sized to accommodate all waste streams, using lidded bins for odour and pest control.</li> <li>▪ Subject to regular waste collection and cleaning to prevent accumulation and ensure hygiene.</li> </ul> <p>An integrated waste collection room is not preferred since:</p> <ul style="list-style-type: none"> <li>▪ Site waste generated is primarily dry, non-putrescible, and low risk for odour or pests.</li> </ul> <p>External storage allows safer and more efficient access for collection vehicles, minimising operational disruption.</p>	

Summary of Issue Raised	Response	Supporting Document
<p><u>RORO Bin Utilisation and Clearance Requirements</u></p> <p>a. The facility is expected to utilize Roll-On Roll-Off (RORO) bins for waste collection. It is recommended that the Department request detailed section plans to demonstrate that the required height clearances are afforded for the safe and efficient collection of these bins. This includes clearances for both the RORO vehicles and the bins during loading and unloading operations. Ensuring proper clearances will mitigate the risk of damage to property and equipment.</p>	<p>Collection of the 35m<sup>3</sup> RORO skip bin will be accommodated by a 10m HRV hook truck (5.5m required clearance), Refer to updated Architectural Building Sections plan (14291_DA031) for clearance provided under warehouse awnings</p>	<p>Appendix L</p>

Table 4 DCCEEW CPHR Response Table

Summary of Issue Raised	Response	Supporting Document
<p><b>NSW DCCEEW – Conservation, Programs, Heritage and Regulation Group</b></p>		
<p><u>Waterway health</u></p>		
<ul style="list-style-type: none"> <li>Insufficient information has been provided to demonstrate that the Wianamatta–South Creek stormwater management targets have been met. CPHR recommends that the proponent addresses the Technical guidance for achieving Wianamatta–South Creek stormwater management targets, and</li> </ul>	<p>MARV targets were established in the Bulk Earthworks Application DA 24/0284. Please refer to Appendix F for the relevant original technical study.</p>	<p>Appendix F (Bulk Earthworks Integrated Water Cycle Management Plan)</p>

Summary of Issue Raised	Response	Supporting Document
<p>provides a water and stormwater management plan, detailed MUSIC model and detailed designs and civil drawings that align with each other.</p>		
<p><u>Biodiversity</u></p> <ul style="list-style-type: none"> <li>The site is wholly within certified – urban capable land under the Cumberland Plain Conservation Plan (CPCP) and has boundaries with certified land, therefore no further biodiversity assessment is required.</li> </ul>	<p>Noted</p>	
<ul style="list-style-type: none"> <li>CPHR considers that the proposal is generally consistent with the CPCP Mitigation Measures Guidelines noting that no trees, vegetation or topsoil remain on the site following completion of the works approved under the Council Bulk Earthworks DA.</li> </ul>	<p>Noted</p>	
<ul style="list-style-type: none"> <li>CPHR recommends that a condition of consent is applied requiring compliance with the CPCP Mitigation Measures Guidelines.</li> </ul>	<p>Noted.</p>	

Table 5 TfNSW Response Table

Summary of Issue Raised	Response	Supporting Document
<b>Transport For NSW</b>		
<p><u>Intersection upgrade of Patons Lane and Luddenham Road (Northern Intersection Upgrade)</u></p> <p>TfNSW notes that the application proposes the upgrade of the Luddenham Road/Patons Lane intersection with traffic signals. The project timeline indicates that the intersection will be upgraded in 2026, prior to the occupation of the first warehouses in the estate. Whilst TfNSW do not object to the proposed traffic signals in principle, in accordance with section 87 of the <i>Roads Act, 1993</i> traffic signals can only be approved by TfNSW, and to date TfNSW have not provided any approval for the traffic signals to be installed.</p> <p>Recommended action:</p> <p>To enable an approval in principle for the installation of traffic signals, TfNSW requires:</p> <ul style="list-style-type: none"> <li>▪ an updated Warrant Assessment in accordance section 2.3 of the RTA Traffic Signal Design Guide, which includes the cumulative traffic of other developments that will use the Luddenham Road / Patons Lane intersection</li> <li>▪ a concept design for the proposed traffic signals designed in accordance with TfNSW</li> </ul>	<p>Noted. HB+B recognises that Transport for NSW approval is required for the proposed traffic signals at the intersection of Patons Lane and Luddenham Road. The information requested will be included in the forthcoming Local Development Application to Penrith City Council.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>Traffic Signal Design Guide requirements be submitted to TfNSW for review</p>		
<p><u>Orchard Hills Stabling and Maintenance (OHSM) Facility</u></p> <p>TfNSW notes that the Applicant has been in discussion with Sydney Metro regarding the access requirements for long vehicles accessing the OHSM and that discussions are ongoing. Sydney Metro have advised that they will provide a separate response in relation to this SSD to the department after discussion with their Principal contractor.</p>	<p>Noted.</p>	
<p><u>Construction Pedestrian Traffic Management</u></p> <p>TfNSW notes that the CTMP has removed the installation of temporary traffic signals at the Luddenham Road/ Patons Lane intersection. Due to the large volume of construction vehicles using the Luddenham Road/ Patons Lane intersection and interaction with the construction of the OHSM, TfNSW will require a Construction Traffic Management Plan to ensure that the construction traffic impacts are appropriately mitigated.</p> <p>Recommended condition:</p> <p>To ensure that construction activities for both the OHSM and the proposed development are effectively managed and the cumulative traffic impacts appropriately mitigated, TfNSW recommends that prior to any construction</p>	<p>Noted.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>certIFICATE the applicant consult with TfNSW by email to development.ctmp.cjp@transport.nsw.gov.au in the preparation of a Construction Pedestrian and Traffic Management Plan (<b>CPTMP</b>) to include but not limited to the following:</p> <ul style="list-style-type: none"> <li>▪ To mitigate the impact of construction traffic and reduce interaction with other projects, all access to the site shall be provided from Patons Lane via the intersection of Luddenham Road.</li> <li>▪ Patons Lane is to always remain open to traffic.</li> <li>▪ Proposed haulage routes and construction vehicle access arrangements.</li> <li>▪ Predicted number of construction vehicle movements, detail of vehicle types and demonstrate that proposed construction vehicle movements can be accommodated within the context of road changes in the surrounding area.</li> <li>▪ Identify any potential impacts to general traffic, cyclists, pedestrians, and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works.</li> </ul>		

Summary of Issue Raised	Response	Supporting Document
<ul style="list-style-type: none"> <li>▪ Identify the cumulative construction activities of the development and other projects within or around the development site.</li> <li>▪ Proposed measures to minimise the cumulative impacts on the surrounding road network should be clearly identified and included in the CPTMP.</li> <li>▪ Construction program and construction methodology, including any construction staging.</li> <li>▪ Consultation strategy for liaison with surrounding stakeholders, including Sydney Metro and other developments under construction.</li> <li>▪ Details of crane arrangements including location of any crane(s) and crane movement plan.</li> <li>▪ Proposed construction hours.</li> <li>▪ A detailed plan of any proposed hoarding and/or scaffolding.</li> <li>▪ Provide the direct contact details to businesses and residents impacted by the construction work and TfNSW to resolve issues during construction in real time. The applicant is responsible for ensuring the builder’s direct contact number is current during any stage of construction; and</li> </ul>		

Summary of Issue Raised	Response	Supporting Document
Submit a copy of the final plan to TfNSW for endorsement via email: development.ctmp.cjp@transport.nsw.gov.au.		
<p><u>Green Travel Plan</u></p> <p>TfNSW has reviewed the submitted Green Travel Plan (<b>GTP</b>) and Transport Access Guide (<b>TAG</b>) and is supportive of the plan to encourage sustainable transport options for future users of the development.</p>	Noted.	

Table 6 Heritage NSW Response Table

Summary of Issue Raised	Response	Supporting Document
<b>Heritage NSW</b>		
Through consultation with the Heritage NSW AHIP team, we have received the final version of the Aboriginal Cultural Heritage Assessment (ACHA) for the Industrial Park: Alspec Industrial Park, Orchard Hills: Aboriginal Cultural Heritage Assessment, prepared by EMM, dated April 2024. The AHIP team has advised that further information is required for the AHIP application to progress. Figure 7.1 of the ACHA identifies that the site AIBP23 BS1 / AHIMS#	Noted.	

Summary of Issue Raised	Response	Supporting Document
<p>45-5-5788 extends across the SSD-81434988 project area.</p> <p>Heritage NSW recommends that prior to approval, Planning request confirmation that the AHIP has been issued or an ACHA assessing the impacts of the proposed SSD to AIBP23 BS1 / AHIMS# 45-5-5788 be provided in accordance with the Secretary's Environmental Assessment Requirements.</p>		

Table 7 FRNSW Response Table

Summary of Issue Raised	Response	Supporting Document
<b>Fire Rescue NSW</b>		
<p>FRNSW note the proposal includes a large-scale warehouse). It is the experience of FRNSW that developments of this type pose special problems of firefighting. To ensure first responders have the ability to render safe an incident, should this project be approved, FRNSW make the following recommendations:</p> <ul style="list-style-type: none"> <li>Compliance is demonstrated with FRNSW fire safety guideline - Access for fire brigade vehicles and firefighters. Perimeter Vehicle</li> </ul>	<p>Perimeter vehicle access is provided via surrounding hardstand to the warehouse.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>Access must be provided at ground level and of an obvious and appropriate hardstand material.</p>		
<ul style="list-style-type: none"> <li>▪ It is the experience of FRNSW that the water demand for fire infrastructure servicing a development of this scope is unlikely to be supplied by mains water alone. FRNSW recommend that suitable design considerations are considered for the placement of tanks and other firefighting infrastructure if required.</li> </ul>	<p>Noted – Tanks are proposed in close proximity to the warehouse. Design of the fire infrastructure servicing is to be in accordance with FRNSW requirement (to be undertaken during the Detailed Design).</p>	
<ul style="list-style-type: none"> <li>▪ That thorough analysis of the Fire Brigade Intervention Model is conducted to ensure that appropriate water supply is provided for hydrant and sprinkler systems.</li> </ul>	<p>Noted – An FEBQ will be undertaken and design of the fire infrastructure servicing is to be in accordance with FRNSW requirement (to be undertaken during the Detailed Design).</p>	
<ul style="list-style-type: none"> <li>▪ Implement the applicable provisions of AS2419 Appendix C (informative).</li> </ul>	<p>Noted – An FEBQ will be undertaken and design of the fire infrastructure servicing is to be in accordance with FRNSW requirement (to be undertaken during the Detailed Design).</p>	
<ul style="list-style-type: none"> <li>▪ Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.IF</li> </ul>	<p>Noted</p>	
<ul style="list-style-type: none"> <li>▪ Prior to occupation or commissioning an Emergency Services Information Package</li> </ul>	<p>Noted</p>	

Summary of Issue Raised	Response	Supporting Document
(ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.		

Table 8 NSW RFS Response Table

Summary of Issue Raised	Response	Supporting Document
<b>NSW Rural Fire Service</b>		
The Rural Fire Service has reviewed the submitted documentation and recommends compliance with the bushfire protection measures proposed in the bush fire report prepared by Peterson Bushfire (dated 15 May 2025 reference 20074) for the development.	Noted	

Table 9 Sydney Metro Response Table

Summary of Issue Raised	Response	Supporting Document
<b>Sydney Metro</b>		
The Sydney Metro – Western Sydney Airport ( <b>SMWSA</b> ) project is a Critical State Significant Infrastructure (CSSI) project, which is an interfacing development	Noted, the arrangements for AIBP construction access is to be in accordance with the conditions agreed during the bulk earthworks DA in consultation with Sydney Metro.	Appendix D (Construction Traffic

Summary of Issue Raised	Response	Supporting Document
<p>with the Alspec Industrial Business Park (<b>AIBP</b>), currently under construction. The Sydney Metro Stabling and Maintenance Facility (<b>SMF</b>) is an interfacing development that is currently in construction phase. The sole access for the SMF for construction and delivery of rolling stock is from Patons Lane, and therefore resolution of traffic issues related to the development of this site is essential to ensure the successful operation of the Metro in future.</p> <p>Sydney Metro acknowledges the significant volume of development and construction activities occurring at the AIBP site. However, Sydney Metro as a CSSI project requests that the Department of Planning, Housing and Infrastructure (<b>DPHI</b>) ensure priority is given to Sydney Metro's use of Patons Lane during its AM and PM peak construction hours, and this must be clearly documented across all Construction Traffic and Pedestrian Management Plans (<b>CTMP</b>) associated with the AIBP to ensure a consistent approach.</p>		Management Plan)
<p>Sydney Metro has reviewed the Environmental Impact Statement including Appendix E - Mitigation Measures Table, Appendix P - Construction Traffic Management Plan and Appendix HH - Traffic Impact Assessment and provide the following comments and recommendations for consideration by DPHI in relation to the assessment of the SSD.</p> <p>1. <u>Overarching Construction Traffic and Pedestrian Management Plan - AIBP</u></p>	<p>Noted, the arrangements for AIBP construction access is to be in accordance with the conditions agreed during the bulk earthworks DA in consultation with Sydney Metro.</p> <p>The process was still ongoing following the previous submission of the TIA and CTMP.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>The Applicant has informed Sydney Metro that the Bulk Earthworks Development Application (<b>DA24/0294</b>), which was approved by Penrith City Council on 5 May 2025, will serve as the overarching Construction Traffic and Pedestrian Management Plan (<b>CTPMP</b>) for the AIBP site.</p> <p>As part of the Bulk Earthworks development, Sydney Metro has worked through a range of construction-related impacts through its review of the associated CTPMP. Through this process, Sydney Metro and the Applicant agreed on several mitigation measures to reduce potential delays and congestion during the construction of various AIBP developments, particularly at the Patons Lane/Luddenham Road intersection. This means that the CTPMP for the Bulk Earthworks development should be updated to reflect any subsequent changes or developments. Additionally, all future Construction Traffic Management Plans (<b>CTMPs</b>) for individual projects within the AIBP site must be reviewed to ensure they align with the principles set out in this overarching CTPMP.</p>		
<p>Sydney Metro recommends that all CTMPs, including the overarching CTPMP, include the following agreed key mitigation measures:</p> <ul style="list-style-type: none"> <li>a. Restricting AIBP construction vehicles from using Patons Lane: Vehicular traffic generated during construction stage shall not be permitted to enter</li> </ul>	<p>Noted.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>and exit via Patons Lane and Luddenham Road intersection during the Sydney Metro's peak construction hours, which are between 7.30AM and 8.30AM, and 4.30PM and 5.30PM weekdays. The Applicant is to consider using the site's southern access point for access and egress of all light and heavy vehicles during peak periods.</p>		
<p>b. A requirement for on-ground traffic controllers: Traffic controllers are to ensure that Sydney Metro construction traffic be given priority access to Patons Lane to minimise disruptions for Sydney Metro's construction activities and deliveries, and if required, traffic controllers must divert any AIBP construction vehicles to access the site via the southern driveway on Luddenham Road.</p>	<p>Noted.</p>	
<p>c. Implementing a one-way access/egress arrangement: For periods outside of the construction peak hours, reverting to the one-way loop arrangement, that is enter via Patons Lane and exit via the southern access off Luddenham Road.</p>	<p>Noted.</p>	
<p>d. Unimpeded access to Patons Lane: Patons Lane access must be maintained at all times to not impede Sydney Metro's construction activities.</p>		
<p><b>19. <u>Environmental Impact Statement</u></b> a. Section 3.9.1 Access and Circulation</p>	<p>This diagram has been updated.</p>	<p>Appendix J, updated traffic</p>

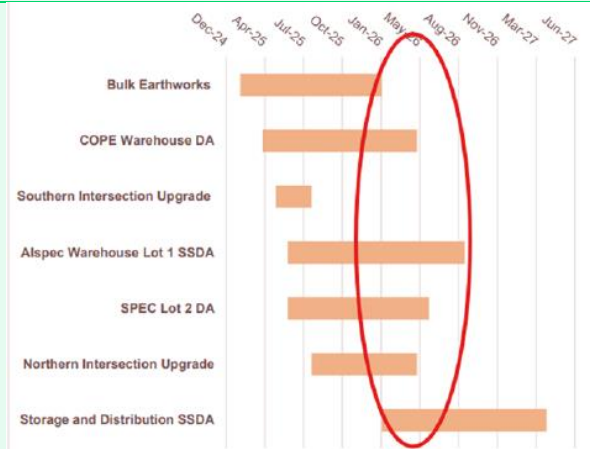
Summary of Issue Raised	Response	Supporting Document
<p>Figure 16: Traffic Movement plan – The colour coding is inconsistent with the identified vehicle types shown in the map.</p> <p>Recommendation</p> <p>To help minimise confusion for this public-facing document and reviewer, it is recommended to amend the entrance/exit markers so the colours are consistent with the vehicle type (i.e. entry point for trucks should be marked pink, exit points for cars should be marked blue).</p>		<p>circulation diagram</p>
<p>b. Section 3.9.2 Parking</p> <p>It is noted that 246 parking spaces are being proposed, which exceeds the requirement of 194 spaces. A similar outcome was identified by Sydney Metro and raised against the previous SSDA that was lodged (SSD-69845208), with Alspeck responding that the additional parking spaces is for future demand/development of the site. However, as per Figure 6, each warehouse development has their own parking facility.</p> <p><u>Recommendation</u></p> <p>Request the Applicant confirm what additional development they are referring to that would utilise the additional spaces for this development and SSDA-69845208. An oversupply of parking encourages additional single-vehicle trips, which in turn generates poorer traffic outcomes. Suggest the Applicant modify</p>	<p>The proposed provision of 246 parking spaces exceeds the Penrith DCP minimum requirement of 194 spaces. This allows for potential changes in tenancy, increased workforce, or operational shifts that may require more parking.</p> <ul style="list-style-type: none"> <li>▪ The DCP sets a minimum, not a maximum. Additional spaces are provided to avoid costly future modifications if demand increases.</li> <li>▪ Extra parking supports flexible leasing arrangements and anticipated industrial trends without negatively impacting the site or traffic, as confirmed by our traffic assessment.</li> <li>▪ All spaces are within each warehouse’s designated area, preventing overflow onto public streets or between sites.</li> </ul> <p>The site includes provisions for carpooling and electric vehicles, supporting sustainable transport options.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>the volume of parking spaces to be more in-line with the required amount or confirm which future developments will utilise the additional parking spaces.</p>		
<p>c. Section 3.14 Development Timing</p> <p>It is recommended that the Applicant include details of development timing in relation to the Southern and Northern intersection Development Applications, and how construction activities will be managed if occurring concurrently.</p>	<p>Noted.</p>	
<p>d. Section 6.4.2.1 Construction</p> <p><i>“During this period, the storage and distribution warehouse construction will be yet to commence, and the southern intersection upgrade works will be completed. Therefore, traffic volumes from these construction activities have not been considered in the cumulative assessment”</i></p> <p>The CTMP submitted for this SSDA identifies that the construction activities overlap with four (4) other Alspec developments, including the Northern Intersection Upgrade. As such Sydney Metro strongly recommend that this development be included in the overarching CTMP (Bulk Earthworks) that is being updated.</p>	<p>Noted, the arrangements for AIBP construction access is to be in accordance with the conditions agreed during the bulk earthworks DA in consultation with Sydney Metro.</p>	

Summary of Issue Raised

Response

Supporting Document



Recommendation

Sydney Metro is concerned about the extensive development occurring at the AIBP site, which includes four (4) separate construction projects occurring at the same time as mentioned in the AIBP Indicative Construction Timeline in the CTMP. Among these are two SSDAs, including the Northern Intersection Upgrade. Sydney Metro is concerned about how these construction activities will impact Sydney Metro's construction efforts, especially during the Patons Lane/Luddenham Road upgrade.

Given that these construction activities are expected to generate up to 100 vehicles per hour during the AM peak, Sydney Metro requests that the Applicant ensure all agreed mitigation measures are implemented during construction activities and

Summary of Issue Raised	Response	Supporting Document
<p>clearly documented in the CTMP. These mitigation measures should be focused on ensuring that deliveries to the Sydney Metro site are not delayed.</p> <p>e. Section 6.4.3 Mitigation Measures</p> <p><i>“During the AM and PM peak hours, Sydney Metro construction traffic will be given priority access via Patons Lane. To reduce congestion, traffic controllers will assess the traffic conditions and, if required, will divert any AIBP construction vehicles to access the site via the existing driveway on Luddenham Road.”</i></p> <p>In order to ensure consistency across other developments approved at the AIBP, all vehicular traffic generated during the construction stage shall not be permitted to enter and exit via Patons Lane and Luddenham Road intersection during the Sydney Metro’s peak construction hours, which are between 7.30AM and 8.30AM, and 4.30PM and 5.30PM weekdays. The Applicant is to use the AIBP site’s southern access point for access and egress of all heavy and light vehicles during peak periods.</p> <p><u>Recommendation</u></p> <p>Sydney Metro recommends that the EIS and CTMP be updated to note that this no-access period is subject to extension if there are significant impacts on Sydney Metro’s construction activities during Alspec’s initial construction activities.</p>	<p>Noted, the arrangements for AIBP construction access is to be in accordance with the conditions agreed during the bulk earthworks DA in consultation with Sydney Metro.</p>	

Summary of Issue Raised	Response	Supporting Document
<p><b>20. <u>Construction Traffic Management Plan (Appendix P)</u></b></p> <p>A number of sections in this CTMP need to be updated to reflect the latest CTMP that Sydney Metro reviewed for DA24/0294 (CTMP Version 1.6, dated 31 July 2025) where a number of traffic management mitigation measures were agreed upon.</p>	<p>Noted, the arrangements for AIBP construction access is to be in accordance with the conditions agreed during the bulk earthworks DA in consultation with Sydney Metro.</p> <p>The process was still ongoing following the previous submission of the TIA and CTMP</p>	
<p>a. Section 3.1 Site Access</p> <p>Figure 3-5 Construction traffic flow during Sydney Metro off peak periods – alternate option with traffic controllers is not supported as it will increase construction traffic movement on Patons Lane.</p> <p>The Sydney Metro preferred option is Figure 3-4, where during ‘Sydney Metro off peak’ periods construction vehicles will revert to the one-way loop arrangement, that is to enter via Patons Lane and exit via the southern access off Luddenham Road. This will reduce vehicular movements on Patons Lane by allow vehicles to exit directly onto Luddenham Road. This vehicle movement is shown in Figure 3-4.</p> <p><u>Recommendation</u></p> <p>Figure 3-5 should be deleted and removed from the CTMP as an ‘alternate option’ as this option is not supported due to the construction vehicle impacts created on Patons Lane.</p>	<p>Noted, the arrangements for AIBP construction access is to be in accordance with the conditions agreed during the bulk earthworks DA in consultation with Sydney Metro.</p> <p>Construction timeline has been updated in CTMP.</p>	<p>Appendix D (Construction Traffic Management Plan) Section 3</p>

Summary of Issue Raised	Response	Supporting Document
<p>Figure 3-6 – Indicative AIBP Construction Timeline outlines the proposed construction schedule. However, the indicative dates for the Southern and Northern Intersection Upgrades appear to require updating. It is important that these dates are revised to ensure Sydney Metro has an accurate understanding of AIBP’s peak construction period and its potential impact or overlap with the construction and delivery timelines for Sydney Metro’s rolling stock.</p>		
<p>b. Section 4.1 Assumptions</p> <p>The following statement – <i>“resulting in an increase of up to 95 light vehicle trips along Patons Lane and Luddenham Road in the AM and PM peak hours. These vehicles are assumed to consist exclusively of light vehicles”</i> is to be updated.</p> <p><u>Recommendation</u></p> <p>This sentence should be updated to state 95 vehicle (all-types) trips along Patons Lane and Luddenham Road instead of 96 light vehicle trips.</p>	Noted.	Appendix D (Construction Traffic Management Plan) Section 4
<p>c. Section 4.2 Background Traffic Volumes</p> <p>Part 4.2.2 Sydney Metro – Western Sydney Airport stabling and maintenance facility mentions Oversize over-mass vehicles (OSOM) vehicles are expected to access the SMF site overnight or outside of general peak periods. This information is incorrect as there is</p>	Noted.	Appendix D (Construction Traffic Management Plan) Section 4

Summary of Issue Raised	Response	Supporting Document
<p>no designated or agreed-upon timeframe for the OSOM vehicle movements to and from the SMF.</p> <p><u>Recommendation</u></p> <p>The CTMP is to be updated to reflect the comment above in noting that there is no confirmed timeframe for OSOM vehicles to access the SMF. The CTMP should however provide details on how access will be prioritised for OSOM vehicles to the SMF.</p>		
<p>d. Section 5.2.7 Authorised Traffic Controllers</p> <p>This section of the CTMP does not mention that the Traffic Controllers will also be responsible for prioritising Sydney Metro construction vehicles when delays occur.</p> <p><u>Recommendation</u></p> <p>Update the responsibilities of the authorised traffic controllers to include the following:</p> <p><i>On-site traffic controllers to be required to manage and direct/ manage traffic at the Patons Lane/Luddenham Road intersection to minimise queue lengths and delays for vehicles during construction hours, prioritising Sydney Metro construction traffic even outside of peak periods.</i></p>	<p>Noted.</p>	<p>Appendix D (Construction Traffic Management Plan) Section 5.2.7</p>
<p>e. Section 5.3 Construction Mitigation Measures</p> <p>Dot point 4 outlines the mitigation measures for managing traffic and transport during construction. To eliminate any potential ambiguity, dot point 4</p>	<p>Noted, CTMP updated to reflect latest mitigation measures agreed with Sydney Metro.</p>	<p>Appendix D (Construction Traffic Management</p>

Summary of Issue Raised	Response	Supporting Document
<p>should be updated to align with the agreed construction traffic mitigation measures with Sydney Metro.</p> <p><u>Recommendation</u></p> <p>Dot point 4 should be updated to include the following: <i>During AM and PM peak hours, all AIBP construction vehicles are to access and egress the site via the third access point located 1km south of the Patons Lane/Luddenham Road intersection.</i></p> <p>Dot point 6 states that OSOM deliveries will have priority access to Patons Lane overnight. This mitigation measure is to be updated as there is no designated or agreed-upon timeframe for the OSOM vehicle movements to and from the SMF to occur overnight. The CTMP is to be updated to reflect this.</p>		Plan) Section 5.3
<p>f. Section 6 Summary / Recommendation</p> <p>With several developments taking place at various stages within the AIBP, it is important that this CTMP aligns with the commitments outlined in the recently approved CTMP for the Bulk Earthworks Development Application (DA24/0294). As mentioned above, Sydney Metro has worked with the Applicant to develop several mitigation measures to be included in the CTPMP.</p> <p>To ensure that this CTMP maintains the agreed commitments between Sydney Metro and the Applicant to reduce potential delays and congestion</p>	Noted, the arrangements for AIBP construction access is to be in accordance with the conditions agreed during the bulk earthworks DA in consultation with Sydney Metro.	Appendix D (Construction Traffic Management Plan) Section 6

Summary of Issue Raised	Response	Supporting Document
<p>during the construction of various AIBP developments, including this development, and particularly at the Patons Lane/Luddenham Road intersection, the following mitigation measures are to form part of the CTMP for this SSD. It is recommended to include the agreed mitigation measures as conditions of consent and in the CTMP.</p> <p><u>Recommendation</u></p> <p>To ensure a consistent approach to managing traffic impacts at the AIBP, as agreed by Sydney Metro and the Applicant, the following conditions are recommended to be included as part of the CTMP:</p>	<ul style="list-style-type: none"> <li>▪ Vehicular traffic generated during constriction stage shall not be permitted to enter and exit via Patons Lane and Luddenham Road intersection during the Sydney Metro’s peak construction hours, which are between 7.30AM and 8.30AM, and 4.30PM and 5.30PM weekdays. The Applicant is to consider using the site’s southern access point for access and egress of all light and heavy vehicles during peak periods.</li> <li>▪ Traffic controllers are to ensure that Sydney Metro construction traffic be given priority access to Patons Lane to minimise disruptions for Sydney Metro’s construction activities and deliveries, and if required, traffic controllers must divert any AIBP construction vehicles to access</li> </ul>	

Summary of Issue Raised	Response	Supporting Document
<p>the site via the southern driveway on Luddenham Road.</p> <ul style="list-style-type: none"> <li>▪ For periods outside of the construction peak hours, reverting to the one-way loop arrangement, that is enter via Patons Lane and exit via the southern access off Luddenham Road.</li> <li>▪ Patons Lane access must be maintained at all times to not impede Sydney Metro’s construction activities.</li> </ul> <p>In addition to the above, Sydney Metro recommends that DPHI include a condition of approval requiring the Applicant to continue to liaise with Sydney Metro and incorporate in any feedback received in the preparation of the Construction Traffic Management Plan prior to the commencement of works on the site.</p>		
<p><b>21. <u>Traffic Impact Assessment (Appendix HH)</u></b></p> <p>a. General comment</p> <p>Please ensure the Traffic Impact Assessment includes the construction impact assessment from other developments at the AIBP.</p>	<p>Noted.</p>	
<p>b. Section 5.5.1 Assessed Network and Traffic Demand</p> <p>It is unclear if background traffic has been included in the traffic modelling to assess the impacts of the Storage and Distribution warehouse development,</p>	<p>Noted, wording within Section 5.5.1 has been updated to state what has been included in the modelled scenarios.</p> <p>Scenario A has been updated to “Year 2027”</p> <p>Scenario B has been updated to “Year 2036”</p>	<p>Appendix B (Traffic Impact Assessment) Section 5.5.1</p>

Summary of Issue Raised	Response	Supporting Document
<p>and concurrent AIBP warehouse developments at the Luddenham Road/ Patons Lane intersection and Patons Lane/ Site Access A intersection.</p> <p>Table 5-11 includes turning movement demands for Scenario A and Scenario B. It is unclear if the volumes are from the development or if they include background traffic also.</p> <p><u>Recommendation</u></p> <p>Sydney Metro request the Applicant to confirm that the background traffic has been included in Scenarios A and B of the modelling assessment.</p> <p>Table 5-11 – Can the Applicant confirm if the volumes are from the development or if they include background traffic. Can this be made clearer in the table and/or the preceding commentary.</p>		
<p>c. Section 5.5.2 Findings and Results</p> <p><i>“During the AM and PM peak hours, Sydney Metro construction traffic will be given priority access via Patons Lane.”</i> This statement contradicts the key construction mitigation measures.</p> <p><u>Recommendation</u></p> <p>Please update to clarify that AIBP construction vehicles will not be permitted to access Patons Lane during Sydney Metro AM and PM peak construction times.</p>	<p>Noted.</p>	<p>Appendix B (Traffic Impact Assessment) Section 5.6.2</p>

Summary of Issue Raised	Response	Supporting Document
<p>d. Section 5.2.3 STFM Model</p> <p>This section states that 2036 traffic forecasts were informed using STFM outputs.</p> <p><u>Recommendation</u></p> <p>Sydney Metro recommends the Applicant provide clarification on how 2027 forecasts were determined.</p>	<p>The Year 2027 forecasts were determined using 2025 Matrix survey data, with an applied annual growth rate of 2.5%. Wording has been added to Section 5.2.2 for clarity.</p>	<p>Appendix B (Traffic Impact Assessment) Section 5.2.2</p>
<p>e. Section 5.6.1 Construction Impact</p> <p>Cumulative construction traffic assessment results table does not match the latest CTMP that Metro reviewed (CTMP version 1.6, dated 31 July 2025).</p>	<p>Noted, the bulk earthworks consultation was still ongoing following the previous submission of the TIA and CTMP.</p> <p>Construction assessment results have been updated for consistency.</p>	<p>Appendix B (Traffic Impact Assessment) Section 5.6.1</p>
<p>Additional submission to DPHI</p> <p>Sydney Metro is currently awaiting feedback from the project team about possible delays in the delivery of equipment and rolling stock to the Sydney Metro Stabling and Maintenance Facility. An updated submission is to be provided to ensure any additional project related concerns on the timely delivery and construction of the Sydney Metro Western Sydney Airport project are not adversely impacted by the subject development</p>	<p>Noted.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>Sydney Metro advises that it is not in a position to make a decision until the additional information outlined below is provided for Sydney Metro’s further review:</p> <p>a. Survey: a detailed survey plan and sections prepared by a NSW registered surveyor, including:</p> <ul style="list-style-type: none"> <li>• Lot and Deposited Plan (DP) number(s)</li> <li>• site dimensions</li> <li>• reduced levels (RLs) to Australian Height Datum (AHD)</li> <li>• the boundaries between the Development and: <ul style="list-style-type: none"> <li>– the rail corridor (including Sydney Metro First and Second Reserves)</li> <li>– adjoining (surface, below and above ground) rail infrastructure and utilities</li> <li>– any Sydney Metro land</li> <li>– any Easements (including right of ways).</li> </ul> </li> </ul> <p>b. Proposed Excavation: Confirmation that no excavation over 2m is proposed.</p> <p>c. Acoustic report: Please update the assessment to consider future Western Sydney Airport metro line operation.</p>	<p>a. A detailed survey plan is included in Appendix H. This shows that the site is 281 metres from the Sydney Metro corridor.</p> <p>b. All significant bulk earthworks have been approved under DA24/0294. No excavation over 2m in the vicinity of Metro corridor is proposed in this application.</p> <p>c. While the western sydney Airport metro line proposes to pass to the west of the site boundary there is no significance to noise or vibration impacts from the proposed storage and distribution warehouse.</p> <p>Operation of the development will not cause noise or vibration that will effect the metro line or its passengers.</p> <p>Cumulative impact from the development has been assessed in accordance with the methodology agreed with Penrith Council and DPHI. There is no requirement to include noise from Sydney Metro in the assessment of cumulative operational noise, and any noise from the proposed Metro line will only increase background noise in the area.</p>	<p>Appendix H detailed survey showing distance of the site from the Sydney Metro corridor.</p>

Summary of Issue Raised	Response	Supporting Document
<p>The Department of Planning, Housing and Infrastructure (DPHI) is requested to forward this request for the Additional Information to the Applicant and Sydney Metro recommends that the Applicant consult with Sydney Metro before submitting the Additional Information to DPHI.</p> <p>Sydney Metro requests that the Additional Information be forwarded to SydneyMetroCorridorProtection@transport.nsw.gov.au to enable Sydney Metro to undertake the required internal review as quickly as possible and within the required statutory timeframe. Subject to the outcome of Sydney Metro’s review of the Additional Information, further additional information may be required before Sydney Metro can determine whether the proposal will have any impacts on the Sydney Metro – Western Sydney Airport rail corridor.</p>	Noted.	

Table 10 Sydney Water Response Table

Summary of Issue Raised	Response	Supporting Document
<b>Sydney Water</b>		
<u>Water Servicing</u>		
<ul style="list-style-type: none"> <li>The proposed development is located in the Greater Penrith Eastern Creek (GPEC)</li> </ul>	Noted.	

Summary of Issue Raised	Response	Supporting Document
<p>investigation area around Sydney Metro, and investigations are progressing ahead of the Orchard Hills precinct.</p> <ul style="list-style-type: none"> <li>▪ The existing service for drinking water is a 250mm watermain along Luddenham Road and Patons Lane, within the Erskine Park Water Supply Zone (WSZ).</li> <li>▪ Sydney Water has undertaken amplification works along Luddenham Road and Patons Lane. The network is likely to have capacity to service the development.</li> <li>▪ Further amplifications, adjustments, deviations and/or minor extensions may be required.</li> <li>▪ Detailed requirements will be provided at the Section 73 application stage.</li> </ul>		
<p><u>Wastewater Servicing</u></p> <ul style="list-style-type: none"> <li>▪ The proponent is seeking to provide a private on-site wastewater management system and therefore, requires no specific comment from Sydney Water.</li> <li>▪ Should the proponent wish to connect to Sydney Water in the future, they should to discuss during their application to ensure key criteria is met.</li> </ul>	<p>Noted.</p>	
<p><u>Next steps</u></p>		

Summary of Issue Raised	Response	Supporting Document
<p>Should the Department of Planning, Housing and Infrastructure (the Department) decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent.</p> <ul style="list-style-type: none"> <li>Section 73 Compliance Certificate</li> <li>Building Plan Approval</li> </ul> <p>Further details of the conditions can be found in Attachment 1.</p>	Noted.	
<p>The Department is advised to forward the enclosed Sydney Water Development Application Information Sheet (for proponent) to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on infrastructure Contributions.</p>	Noted.	

Table 11 DCCEEW Water Response Table

Summary of Issue Raised	Response	Supporting Document
<b>DCCEEW Water Group</b>		
<p>Has reviewed the EIS and is satisfied with the information provided. It is noted water take from aquifer interference activities is part of excavation</p>	Noted.	

Summary of Issue Raised	Response	Supporting Document
to prepare the site was referred to the Groundwater Impact Assessment (Appendix X). However, it is understood these activities have been approved under a previous development application (DA24/0294). DCCEEW Water has no further comment.		

Table 12 Community Submissions Response Table

Summary of Issue Raised	Response	Supporting Document
<b>Community Submissions</b>		
<b><u>Submission 1</u></b>		
<u>Traffic –</u> There has been a noticeable increase in traffic on Luddenham Road, which is already deteriorating and showing signs of significant wear. The road surface is crumbling in several areas and is not coping with the current volume of daily traffic, particularly from vehicles travelling between Elizabeth Drive and Mamre Road. Despite this, Council has not maintained the road to a standard that ensures safety for all users. The current condition poses risks to drivers and continues to worsen due to the increased usage. Prior to any further development the road will require an urgent	A limited section of Luddenham Road will be upgraded as part of the Patons Lane / Luddenham Road upgrade. This will occur in 2026 and is part of the infrastructure required for the Alspec Industrial Business Park. Luddenham Road is recognised as a key link for the Orchard Hills and the Aerotropolis, with a longer term upgrade to a four lane road. Maintenance of the Luddenham Road will continue in the mean time.	

Summary of Issue Raised	Response	Supporting Document
<p>upgrade with the proposed warehousing and the increase in traffic that this will bring.</p>		
<p><u>Noise –</u> The increase in traffic noise, combined with the proposed 24/7 operations of an industrial development across the road from long-term residents, is unacceptable. This is a semi-rural area, and the level of disruption caused by heavy vehicle movements, industrial noise, and round-the-clock operations will significantly impact the amenity, lifestyle, and wellbeing of the existing community. It is unclear how the developer intends to mitigate this increase in noise. Detailed plans must be provided outlining specific measures to reduce the noise impact on nearby residents—particularly during night hours prior to the development commencing.</p>	<p>The Alspeck Industrial Estate has a noise master plan, which takes into consideration the noise impacts on all surrounding residents. A specific Noise Impact Assessment has been undertaken for this proposed warehouse, which assesses all nearby receivers.</p>	<p>Appendix C (Noise Impact Assessment)</p>
<p>Furthermore, Council has failed to properly consult with existing residents prior to rezoning the land for industrial purposes. This lack of transparency and engagement undermines trust in the planning process. If Council intends to permit large-scale industrial infrastructure in this area, then the entire precinct must first be appropriately rezoned with full community consultation, environmental assessments, and infrastructure planning. No construction or approvals should proceed until</p>	<p>The industrial estate was part of a comprehensive rezoning process which included community consultation. This included preparation of a Voluntary Planning Agreement for the provision of essential infrastructure.</p>	

Summary of Issue Raised	Response	Supporting Document
<p>a thorough and inclusive rezoning process has been completed.</p>		
<p><u>Storm Water –</u></p> <p>There is a serious concern regarding the direction and handling of stormwater runoff from the proposed large-scale industrial buildings. The land naturally slopes to the southeast, directing water flow towards South Creek, which runs behind existing residential properties. This area already experiences regular flooding during periods of heavy rain. Any increase in surface runoff, including overflow from stormwater tanks or paved industrial surfaces, will exacerbate flooding risks and could cause significant damage to private properties. We request detailed information on how stormwater will be managed, including infrastructure design, overflow contingency plans, and how the development will ensure that no additional stormwater will be directed toward South Creek or surrounding residential areas. Without proper flood mitigation strategies prior to development commencing this development poses a direct threat to the safety and integrity of existing homes and land.</p>	<p>The site and the wider estate have been subject to detailed studies in relation to flooding and integrated Water Cycle Management at both the rezoning and Development Application stage. The bulk earthworks development application (DA 24/0294) established the water management framework for the estate. This has been followed with a detailed water cycle management plan for this warehouse. There will be no flooding or drainage impacts on surrounding residents as a result of the development of the industrial estate.</p>	<p>Appendix F and Appendix G</p>
<p><u>Lighting and Residential Amenity –</u></p> <p>A 24/7 warehousing operation will require extensive external lighting, which will significantly affect the</p>	<p>The lighting for the proposed warehouse is directional and designed to illuminate the immediate area. The warehouse is distant from surrounding</p>	

Summary of Issue Raised	Response	Supporting Document
<p>standard of living for residents directly across the road from the proposed development. Light pollution, particularly at night, will disrupt sleep, reduce residential amenity, and alter the semi-rural character of the area. Clear plans must be provided on how lighting impacts will be mitigated prior to development commencing. This should include the use of shielded, directional lighting, curfews on non-essential illumination, landscaping buffers, and compliance with light spill regulations for adjacent residential zones.</p>	<p>residents. Intrusive light spill from this warehouse is unlikely to impact residential neighbours.</p>	
<p><b><u>Submission 2</u></b></p> <p>As a neighbouring occupant to the proposed development, Alspec Warehousing Facility, (SSD-81434988), we have had access to water tapped into the main water pipes, delivering water from Warragamba to Prospect. This is agriculture water not drinking water. Our water pipe line travels through the proposed development site. We are concerned that with the future construction of the warehousing facility our access to water via the Water NSW pipeline may be disrupted or discontinued. This is of major concern to us, should we experience a house fire we would not have enough water supply or water pressure to extinguish a fire hazard. This is not an objection to the proposed Alspec Warehousing Facility Development application but a concern that seeks</p>	<p>The pipeline is not part of this warehouse lot. The pipeline is partly within the Business Park and its continued use will not be impacted by future development.</p>	

<b>Summary of Issue Raised</b>	<b>Response</b>	<b>Supporting Document</b>
clarification and confirmation of our future concerning water access.		

# **4 Updated Project Justification**

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# 4 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole. The proposed development has been assessed with regard to the matters for consideration under section 4.15 of the EP&A Act and the SEARs issued by DPHI. We conclude that the proposed development can be supported for the following reasons:

- The proposed land use is permissible with consent in the E4 General Industrial zone under the Penrith Local Environmental Plan. The proposal is consistent with relevant State and local strategic and statutory policy.
- The Project aligns and has been designed in respect to the emerging local character of the Alspec Industrial Business Park and broader locality with adequate consideration is given to the site-specific constraints and opportunities.
- The detailed impact assessment undertaken for the Project demonstrates that the proposed development can occur without any unacceptable environmental impacts to the nearby residents and the surrounding transport network.

The proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will provide a number of jobs during the construction and operation of the development. This will support local employment to the locality within land identified for industrial employment uses.
- The issues identified during the stakeholder engagement have been addressed through design amendments and the addition of mitigation measures to address potential impacts of the project.

Having considered all relevant matters, there will be no additional environmental impacts as a result of the proposed refinements and clarifications. The proposed measures ensure any previously known and assessed impacts will be appropriately managed and mitigated where relevant. On this basis, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

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