

Our reference: P-911074-H3N1
Contact: Hannah Vousden
Telephone: (02) 4732 7646

02 June 2025

ATTN: Media Hakim
Email: media.hakim@dpie.nsw.gov.au

Dear Media Hakim,

Council Response to EIS – SSD-79300218 – 200 Aldington Road Industrial Estate Stage 1 (Lot F) Cardboard Manufacturing – 106-228 Aldington Road, Kemps Creek (Lot 200 DP 1285691)

Thank you for providing Penrith City Council the opportunity to comment on the above-mentioned Environmental Impact Statement (EIS).

Council Officers have reviewed the information referred for comment on 07 May 2025 and the following advice is provided for the Department's consideration:

1. Planning Considerations

- a) DPHI should be satisfied that the Proponent has demonstrated both consistency with the SSDA-10479 (as modified), and compliance with the relevant conditions of the modified approval, particularly conditions regarding operational noise limitations.
- b) The Department should be satisfied that the proposed carparking arrangements are satisfactory. The change of use from Warehousing and Distribution (1 space per 300sqm of GFA) to General Industry (1 space per 200sqm of GFA) necessitates the provision of additional parking spaces. This is in addition to any additional parking spaces required due to an increase in GFA occurring under SSD-10479 Mod 4.
- c) While this application is for the use and internal fit out of Warehouse 5 only, the internal configuration has implications for the location of a high bay component being assessed under SSD-10479 Mod 4. The high bay racking zone results in a sheer wall 18.5m high which is in an area with minimal landscaped setback

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to Access Road 02. The proposed location is not consistent with 4.2.1 Building Height of the Mamre Road DCP which requires building heights over 15m to be setback from the street frontage. The Department should be satisfied that this is an appropriate location for the high bay racking component despite there being other areas on the site with greater landscaped setbacks or fronting onto lower order roads which would result in a less imposing visual presence.

- d) Appendix M-Waste Management Plan details that 72 x 800kg bales of compacted cardboard are to be collected daily. These bales are to be stored in the Waste Room with 4 x 1,100L bins. The Department is to be satisfied that the size of the Waste Room can accommodate all operational waste (as detailed in the operational waste generation rates in Table 3) and waste stockpiles or bin storage external to the warehouse is avoided. The location of the 30,000L bin, which is located external to the warehouse and associated waste room, should be reconsidered in terms of visual appearance.

2. Environmental Management Considerations

- a) Whilst the EIS refers to the general process of the proposed cardboard manufacturing, the application does not detail all materials to be used and stored on site, for example, paints, inks, dyes, fixing agents and adhesives in cardboard processing, and oils and other liquids used in machine operation, maintenance and workshop activities. A detailed inventory of all materials (nature, quantity, location) to be used on site, including related Safety Data Sheets, should be submitted, along with details of the type and location of pollution controls for satisfactory storage, use and clean-up of these materials. In addition, more detailed information is required regarding the activities proposed to be undertaken in the Maintenance Workshop, including processes, equipment and pollution controls proposed.
- b) In terms of potential environmental impact, operational noise is a key issue of concern, and this is consistent with other industrial subdivision and warehouse developments arising within the surrounding area. The consent framework established by overarching SSD – 10479, applies noise assessment, management and monitoring controls to ongoing operational noise, with the Planning Secretary being the consent authority for the

assessment and approval of operational noise criteria, operational environmental management plans (including for operational noise), as well as noise monitoring and verification. The Department should review the supporting NIA and ensure that noise assessment, mitigation, monitoring and verification is compliant with the requirements of SSD-10479 (and modifications), and to the satisfaction of the Planning Secretary.

Should you wish to discuss this matter further, please contact Hannah Vousden on (02) 4732 7646

Yours sincerely,

A handwritten signature in black ink, appearing to be 'SF' with a stylized flourish.

Sandra Fagan
Principal Planner

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