

Our reference: P-945635-X1X8
Contact: Hannah Vousden
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30 July 2025

ATTN: David Schwebel
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Dear David,

**Council Response to EIS – SSD-80264236 – 200 Aldington Road
Industrial Estate Stage 3 (Lot K) – 106-228 Aldington Road, Kemps Creek
(Lot 200 DP 1285691)**

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

Council has reviewed the information referred for comment on 03 July 2025 and provides the following advice for the Department's consideration:

1. Planning Considerations

- a) The Department 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 car parking arrangements are satisfactory. Particular attention should be given to the visual impacts of the stacked car parking deck as it sits proud of the proposed Warehouse. Consideration should be given to whether the proposed landscaping is sufficient to adequately screen the extent of parking along the frontage to Road 02.

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- c) Section 4.6.1 Parking and Manoeuvring Areas of the Mamre Road DCP states that *the design of car parks should ensure staff/visitor parking is given safe separation from loading dock circulation areas for heavy vehicles*. The architectural plans indicate 20 provisional parking spaces are to be provided in the south-west corner of the site, in the vicinity of loading dock areas. The Department should be satisfied that the proposed location of these parking spaces is in accordance with the intent of the relevant controls in the Mamre Road DCP.
- d) The Department should consider whether it is appropriate the development provide carparking in excess of the stipulated parking rates in the Mamre Road DCP, when the 15% permeability target is not achieved. Consideration should be given to additional tree planting within the carparking areas, which may assist mitigating the lack of planting on the upper parking deck.
- e) Appendix CC-Waste Management Plan details the operational waste requirements of the warehouse. The proposed waste management area does not appear to be commensurate with the anticipated waste generation outlined in the Waste Management Plan. The Department should be satisfied the area provided for waste storage is adequately sized, suitably located noting it is proximate to dock areas and carparking) and suitably screened.
- f) The application should demonstrate that appropriate access and movement paths are maintained for the fire brigade, even when B-doubles are parked along the eastern hardstand area.

2. Development Engineering Considerations

- a) The two vehicular crossings at the south-eastern corner and two vehicular crossings on the western boundary do not comply with the requirements of Penrith Council's Driveway Specification. In accordance with Council's Driveway Specification, new driveways shall have sides either equally angled outwards from the property boundary, and not inward, or perpendicular to the kerb. In this regard, the proposed permanent and temporary vehicular crossings shall generally be designed in compliance with Council's

Driveway Specification. Any variations from Council's Specification should be assessed by DPHI on its merit.

3. Traffic Engineering Considerations

- a) The assessment for traffic generation has adopted the relevant rates specified by Transport for NSW (TfNSW) for application in the precinct. Based on the application of these rates, traffic generation for morning peak will be 76 vehicles per hour (vph) in the AM peak hour, 80 vehicles per hour (vph) in the PM peak hour and 966 vehicles per day. The traffic generated by the proposed development can be accommodated within the road network without any adverse impact. It is assumed that the Department will consult with TfNSW regarding the proposal being traffic generating development.
- b) The site access arrangements, internal circulation and loading docks have been designed in accordance with the relevant Australian Standards. In accordance with the design requirements in Mamre Road Precinct, the 30 metre A-double vehicle (30 metre Performance Based Standards (PBS) Level 2 Type B Vehicle) has been tested as the largest design check vehicle with respect to site access and internal circulation. The Mamre Road Precinct DCP requires 36.5m PBS Level 3 Type A vehicle as checking vehicle. Swept path diagrams should be submitted to DPHI for 36.5m PBS Level 3 Type A vehicle.
- c) As per the architectural plans submitted, the parked trucks will impact access to B-Double parking bays and would need to be managed. This could be addressed by a plan of management for the loading docks.

4. Waterways Considerations

- a) It is assumed that DPHI and the Conservation Programs, Heritage and Regulation (CPHR) Group (formally BCS) will review the waterway health requirements under the DCP. In addition, it is appropriate that DPHI undertake the detailed assessment of the

appropriateness of the strategy as the assessing and consent authority.

- b) The Department should consult with Sydney Water to ensure they, as the drainage manager, are supportive of the designs for the stormwater management measures and approach to stormwater management for the site (as well as in the context of the regional basins that will ultimately service the site).
- c) In the case the development proposal is approved, conditions should be applied to ensure that the on lot GPT's and associated infrastructure will be the responsibility of the developer / property owners to maintain (that is, they cannot be dedicated to Council). It is suggested that a positive covenant be applied to the satisfaction of the Drainage Manager.

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

Yours sincerely,



Sandra Fagan
Principal Planner

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