

# WILLOWTREE PLANNING

---

10 December 2021

REF: WTJ21 - 285

William Hodgkinson  
NSW Department of Planning, Industry & Environment (DPIE)  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2124  
[william.hodgkinson@planning.nsw.gov.au](mailto:william.hodgkinson@planning.nsw.gov.au)

**RE: RESPONSE TO SUBMISSIONS - PROPOSED SECTION 4.55(1A) MODIFICATION APPLICATION - SSD 9522 (MOD 2)**

**PROPERTY AT 657-769 MAMRE ROAD, KEMPS CREEK LOT 34 DP1118173, LOTS X & Y DP421633, LOT 1 DP 1018318 & LOT 22 DP258414)**

Dear Will,

Reference is made in relation to the proposed modification application (MOD 2) to SSD 9522 and the request for additional information received from DPIE on 30 November 2021. Specifically, this letter seeks to respond to the following:

- Penrith City Council comments received 29 November 2021;
- Transport for New South Wales (TfNSW) comments received 3 December 2021; and
- Central Western Team comments received 6 December 2021.

In addition, this letter seeks to amend Condition A26 of SSD 9522 pursuant to Clause 121B of the *Environmental Planning and Assessment Regulation 2000* to modify the boundary alignment of the lot to a line of best fit given the irregularity of the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP) zoning boundaries. Updated plans have been provided in **Appendix 1** which include the proposed lot boundary. Specifically, Condition A26 is proposed to be amended to read as follows:

*Prior to the issue of the subdivision certificate required under condition A25, the applicant must demonstrate the lot boundaries align with the current zoning under the State Environmental Planning Policy (Western Sydney Employment Area) 2009 to the satisfaction of the Planning Secretary.*

It is noted that there is no change in area between the RE1 and RE2 zoned land as a result of the proposed modification. Despite the relocation of approximately 2,141m<sup>2</sup> of land, the balance of the land remains unchanged as reflected on the plans provided in **Appendix 1**.

ACN: 146 035 707 ABN: 54 146 035 707  
Suite 4, Level 7, 100 Walker Street  
North Sydney, NSW 2060

[enquiries@willowtp.com.au](mailto:enquiries@willowtp.com.au)  
[willowtreeplanning.com.au](http://willowtreeplanning.com.au)  
02 992 9 6974

Following review of the Penrith City Council, TfNSW and Central Western Team comments in relation to the modification application, the matters raised have been taken into consideration and are accurately addressed in the response table below.

Having regard to the comments received by TfNSW, a response has been prepared by Ason Group and is provided in **Appendix 2**.

It is considered that this information now provides the NSW DPIE with all the necessary facts and relevant particulars in relation to the Proposed Development identified within the relevant comments; therefore, enabling assessment of this State Significant Development (SSD) Application to proceed.

We look forward to the NSW DPIE's feedback on the information provided and look forward to progressing with the SSD modification application further.

Should you wish to discuss further, please contact Cameron Gray on 0477003429 or [cgray@willowtp.com.au](mailto:cgray@willowtp.com.au).

Yours Faithfully,



Andrew Cowan  
Director  
Willowtree Planning Pty Ltd  
ACN 146 035 707



Summary of, and response to comments	
Comments	Response
<b>Penrith City Council Comments</b>	
<b>1. Planning Considerations</b>	
(a) <u>Background</u>	<p>Noted.</p> <p>On December 2020, development consent was granted for the development of the Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD-9522). The approval included the following:</p> <ul style="list-style-type: none"> <li>– Construction of eight warehouses with a total Gross Floor Area of 162,355sqm over eight lots,</li> <li>– Associated loading docks, hardstands, car and truck parking, and landscaping,</li> <li>– Site wide bulk earthworks to create building pads, three estate basins,</li> <li>– Internal road network including a north-south distributor road connecting the southern neighbouring property,</li> <li>– Subdivision.</li> </ul> <p>The development included the widening of Mamre Road and upgrades to an existing signalised 'T' intersection at Mamre Road and Bakers Lane to facilitate site access over two sequences (Sequence 1A and 1B).</p> <p>The Department has approved one modification to the consent. Modification application (MOD 1) approved:</p> <ul style="list-style-type: none"> <li>– the reduction in warehouse buildings from eight to seven by amalgamating two warehouses into one,</li> <li>– increased overall Gross Floor Area from 162,355sqm to 186,123sqm (an increase in GFA of 23,768sqm),</li> <li>– an increase in car parking from 744 to 772 spaces (+28 spaces),</li> </ul>

ACN: 146 035 707 ABN: 54 146 035 707  
 Suite 4, Level 7, 100 Walker Street  
 North Sydney, NSW 2060

enquiries@willowtp.com.au  
[willowtreeplanning.com.au](http://willowtreeplanning.com.au)  
 02 992 9 6974



SYDNEY | NEWCASTLE | GOLD COAST | BRISBANE

Summary of, and response to comments	
Comments	Response
<ul style="list-style-type: none"> <li>– a reduction in landscaped setbacks along the North South Distributor</li> <li>– Road from 4m to 3.75m (in alignment with the site specific DCP),</li> <li>– amendments to the staging of the sequence 1A and 1B intersection upgrades,</li> <li>– relocation of the North-South Distributor Road to the east,</li> <li>– amendments to the cul-de-sac arrangements to lots 5-8, and</li> <li>– an increase in the largest vehicle permitted to access the site from a 26m B-Double to a 30m super B-Double heavy vehicle.</li> </ul> <p>The reasoning provided as to the modification application was to accommodate the requirements of a specific tenant at proposed Lot 5.</p> <p>This modification application represents the second modification to the SSD consent.</p>	
<p>(b) <u>Strategic matters</u></p> <p>The Department's assessment of SSD 9522 considered a site-specific development control plan (SSD 9522 Development Control Plan 2020, Mamre Road Precinct (Kemps Creek Industrial Estate), dated 3 August 2020).</p> <p>Subsequently, Condition A10 of consent no. SSD 9522 was imposed and requires that the Applicant must lodge revisions to the Penrith Development Control Plan 2014 (<b>PDCP</b>) to incorporate the site-specific DCP with Council within 6 months of commencing development under the consent, which is dated 21 December 2020.</p> <p>Council advises that on 25 November 2021, correspondence was received requesting an amendment to PDCP 2014 as per the requirements of Condition A10 of consent SSD 9522.</p> <p>It is noted that the Mamre Road Precinct Development Control (<b>DCP</b>) Plan 2021 was adopted by the Group Deputy Secretary, Planning Delivery and Local Government (under delegation from the Secretary) of the Department of Planning, Industry and Environment (<b>DPIE</b>) on 17 November 2021 and came into force on Friday 19 November 2021.</p> <p>The Department is to confirm if the Mamre Road Precinct DCP (<b>MRP DCP</b>) applies to the SSD and any subsequent modifications or proposals on the site, noting that PDCP 2014 no longer applies to the Precinct, and that no savings and transitional provisions or arrangements apply as provided by Section 1.2.3 of the MRP DCP.</p>	
	<p>The built form approved under SSD 9522 and subsequent MOD 1 are subject to the site-specific Development Control Plan titled <i>SSD 9522 Development Control Plan 2020, Mamre Road Precinct (Kemps Creek Industrial Estate)</i> dated 3 August 2020 and prepared by Willowtree Planning Pty Ltd. It is noted that only minor changes</p>



Summary of, and response to comments	
Comments	Response
<p>The development shall comply with the DCP applying to the site and compliance must be detailed in an amended Section 4.55 report.</p>	<p>to the built form approved under SSD 9522 and subsequent MOD 1 is proposed as part of the subject modification application. The development as proposed remains generally consistent with the site-specific DCP.</p> <p>The explanatory note contained within SSD 9522 states that any new development applications would be subject to the Mamre Road Precinct DCP. As this application is a modification application to SSD 9522, the Mamre Road Precinct DCP does not apply.</p>
<p>(c) <u>Estate Roads</u></p> <p>As has been raised with DPIE in relation to other state significant development proposals within the Precinct, each warehouse is to be provided with direct frontage to an estate road. Warehouses 1A and 2 are battel-axe warehouse lots with poor to no street front presentation and the resulting cluttering of access handles and driveways connecting to Bakers Lane will reduce opportunities for street tree planting and will impact the ability to achieve consistent and high amenity green streetscapes</p>	<p>This comment is not relevant as no changes are sought to Warehouses 1A and 2 within this application, and should not delay determination of the modification application. There is no material change to the configuration of the Estate, only changes to the road widths and some additional warehouse area pertaining to lots 6 and 8.</p>
<p>(d) <u>Dedication of roads and nomination of open space edge road</u></p> <p>The applicant is encouraged to meet with TfNSW and Penrith City Council (not TfNSW in isolation) in relation to the design of roads, in particular roads which will be dedicated to Council and any related intersections.</p> <p>Plans (including bulk earthworks, architectural and landscape and subdivision plans) shall clearly identify the Open Space Edge Road compliant with the location and design requirements and objectives specified within the Mamre Road Precinct DCP. The Open Space Edge Road shall not be nominated as 'Unresolved land use' on plans, sections or details (also refer to engineering comments below).</p> <p>Sections and details of the Open Space Edge Road shall clearly describe the levels achieved in relation to the adjacent Open Space. Adjacent levels and any retaining walls or other structures shall not prohibit, obstruct or unduly impact its delivery,</p>	<p>Consultation has previously been undertaken with TfNSW and Council regarding the proposed road and intersection layouts. It is considered that sufficient information has been provided for an assessment to be undertaken. The Mamre Rd/Bakers Lane intersection design is being finalised by TfNSW and all other intersections details have been provided with the MOD 2 application for review and conditioning by Council. It is noted that the design is consistent with the relevant controls contained in the site-specific DCP, with the submission including all turning movements for various sized articulated vehicles, to fully satisfy condition B4.</p> <p>The Open Space Edge Road is not the subject of this modification application and is not a matter for consideration.</p> <p>The approved development is subject to the site-specific DCP and the controls contained in the Mamre Road Precinct DCP are not relevant to the subject modification application or approved development.</p>



Summary of, and response to comments	
Comments	Response
<p>including the ability for the roadway to be constructed at the required finished levels having regard to its purpose and relationship with the adjacent open space (refer Figure 16 of MRP DCP).</p> <p>The width of the Open Space Edge Road shall be consistent through Lot 13 and the Lot nominated as Stage 1, Subdivided Lot 2.</p>	<p>Sufficient details have been provided with the MOD 2 submission to enable the determination of the modification application. The approved development is subject to the site-specific DCP and the controls contained in the Mamre Road Precinct DCP are not relevant to the subject modification application or approved development.</p>
<p>(e) <u>Proposed narrowing of roadway widths</u></p> <p>The Mamre Road Precinct DCP includes at Section 1.6 Precinct Vision, that the Mamre Road Precinct will be a <u>world-class</u> industrial area and that Western Parkland City principles will be implemented through the blue and green grid, and that ambitious landscaping requirements which contribute to the Greater Sydney Region Plan target of 40% tree canopy across Metropolitan Sydney.</p> <p>It is further noted that development in the precinct is expected to be <i>high quality and that public domain will deliver a pleasant, safe and efficient working environment with attractive places for pedestrians and cyclists as well as being safe for cars and trucks.</i></p> <p>Council does not agree with the justification for the reduced roadway widths provided by Willowtree in Section 5 of the Section 4.55(1A) Modification Application letter, dated 19 October 2021, specifically the statements at dot points 3, 4, 5, 6, and 7.</p>	<p>Noted.</p> <p>Noted</p> <p>No justification has been provided as to why Council does not agree with the relevant statements. Further commentary on points 3-7 is provided below:</p> <ul style="list-style-type: none"> <li>▪ <i>The road widths proposed will continue to support large scale warehousing, industrial and logistics operations within the Estate by accommodating the maximum size vehicles required.</i></li> </ul> <p>The road widths as proposed maintain compliance with the Mamre Road Precinct DCP and will not alter the maximum size vehicles that the roads can accommodate.</p> <ul style="list-style-type: none"> <li>▪ <i>The reduced road widths do not compromise the quality of the landscaped outcomes within the Estate and ensures that the underlying objectives, as envisaged under the Western City District Plan in this</i></li> </ul>



Summary of, and response to comments	
Comments	Response
	<p>respect are maintained in terms of contributing to mitigating the heat island effect.</p> <p>As above, the road widths as proposed maintain compliance with the Mamre Road Precinct DCP for roads widths and the site-specific DCP for landscaping setbacks and will continue to provide compliant landscaped areas.</p> <ul style="list-style-type: none"> <li><i>If the road widths as approved under SSD 9522 were maintained, it is considered that this would result in the inefficient utilisation of industrial zoned land. The reduction in this respect ensures that there are some minor configurations to certain industrial development lots which provides for greater efficiency and in some instances minor building footprint expansions (0.7% increase in GFA) to enhance employment generating operations. This aligns directly with the zone objectives in terms of employment creation.</i></li> </ul> <p>As above, the road widths as proposed maintain compliance with the Mamre Road Precinct DCP for road widths and the site-specific DCP and will continue to provide a compliant built form.</p> <ul style="list-style-type: none"> <li><i>The changes as noted above in terms of the building footprints will have no detrimental or adverse impact on the visual outcomes as anticipated within the original approval. Specifically, the visual impacts of the Estate when viewed from the adjoining South Creek area and RE1 zoned land would not be materially affected.</i></li> </ul> <p>Given the nominal increase in GFA (0.7%) with no changes to building height, the proposed modifications will not result in any additional visual impacts.</p> <ul style="list-style-type: none"> <li><i>The changes to the proposed road widths, some development allotments and building footprints, will have no adverse material impact on the stormwater quantity and quality outcomes per the original approval. The stormwater infrastructure is appropriately sized to accommodate the development on this basis.</i></li> </ul>



Summary of, and response to comments	
Comments	Response
<p>Council's requirements for wide landscaped medians were considered in the Department's assessment report attached to MOD 1 and the applicant amended the site plan to meet Council's minimum standards.</p> <p>No valid justification is provided for the deletion of the central landscaped medians, and it is noted that GFA is increased again under this Modification from 186,123sqm to 187,378sqm (a further increase of 1,255sqm on top of the 23,768sqm GFA increase approved under MOD 1 (total 25,023sqm)).</p> <p>It is raised for Department's strong consideration that there are significant negative cumulative impacts resulting from:</p> <ul style="list-style-type: none"> <li>– The continued increase in Gross Floor Area,</li> <li>– the reduction in landscaping opportunities,</li> <li>– incorporation of battle axe warehouse lots and warehouse amalgamation, and,</li> <li>– increased car parking numbers, hardstands and hard surfaces, coupled with, decreased landscaped setbacks, and</li> <li>– the deletion of estate wide landscaped central medians, is significantly eroding the quality of the development's contribution to the design quality of the Precinct and the site's contribution to canopy tree cover targets.</li> </ul>	<p>No change to the approved stormwater infrastructure is proposed and as advised, in the Civil Engineering documentation submitted, the stormwater infrastructure is appropriately sized to accommodate the nominal increase in GFA.</p> <p>Noted.</p> <p>The proposed modifications are generally consistent with the cross sections nominated in the site-specific DCP and the Mamre Road Precinct DCP where road cross sections have been nominated.</p> <p>The proposed increase in GFA is nominal (0.7%) and will not result in any additional impacts to the precinct or surrounding land.</p> <p>The development as modified will continue to provide areas for landscaping which are generally consistent with the approved development and site-specific DCP.</p> <p>The general configuration remains unchanged under this modification application and as such this matter is not considered relevant.</p> <p>The development as modified will continue to provide areas for landscaping which are generally consistent with the approved development and site-specific DCP. Where appropriate, landscaped setbacks in excess of the requirements have been provided to compensate for any minor carpark intrusion into the landscape setbacks required by road curves. The overall quantum of landscaping is increased. The proposed modifications to the central medians are generally consistent with the site-specific DCP and the Mamre Road Precinct DCP where cross sections have been nominated.</p>



Summary of, and response to comments	
Comments	Response
<p>In its assessment of MOD 1 and the original SSD application, the Department relied on detailed landscape plans, visual impact analysis and photomontages which indicated central median planting.</p> <p>The planting is considered an essential component of the design of the approved development, and it is recommended that this be retained and protected through to delivery.</p> <p>The applicant must make clear on all plans and sections (including landscape and architectural plans), where the future boundary to the final alignment of Mamre Road is and what the ultimate setback and landscape treatment will be (compliant with the DCP).</p>	<p>Noted.</p> <p>In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p> <p>Landscape Plans were included with the proposed modification application which included sections (Section A-A to F-F) that included details of the ultimate setback and landscape treatments consistent with the site-specific DCP.</p>
<p>(f) <u>Addition of car parking spaces</u></p> <p>Council does not support the proposed addition of five car spaces within the entry driveway to Lot 6.</p> <p>Council does not support any encroachments into the already reduced (4m to 3.75m under MOD 1) landscaped setback to Estate Roads.</p>	<p>The proposed additional parking is consistent with the Mamre Road Precinct DCP and site-specific DCP car parking requirements, as well as AS2890.1 and will not result in any additional traffic or parking impacts, as described in the submitted Traffic Report.</p> <p>Where appropriate, landscaped setbacks in excess of the requirements have been provided to compensate for any minor carpark intrusion into the landscape setbacks required by road curves. The overall quantum of landscaping is increased.</p>
<p>(g) <u>Landscaped blisters</u></p> <p>Landscaping must be provided in accordance with the requirements of the Mamre Road Precinct DCP. It is requested that landscaped setbacks be increased to comply with the MRP DCP.</p> <p><i>As per the requirements of the MRP DCP, tree planting in the form of island planter beds shall be provided at a rate of one planter bed per 10 car spaces (preference is 1 every 6 spaces) within car parks to reduce the heat island effect of hard surfaces that are a minimum 1.5m wide</i></p>	<p>The approved development is subject to the site-specific DCP and the controls contained in the Mamre Road Precinct DCP are not relevant to the subject modification application or approved development.</p> <p>The approved development is subject to the site-specific DCP and the controls contained in the Mamre Road Precinct DCP are not relevant to the subject modification application or approved development.</p>



Summary of, and response to comments	
Comments	Response
<p>Landscaped blisters are not in compliance with the newly adopted DCP.</p> <p>Consideration shall be given to the staggering of landscaped blisters where appropriate, to increase shade coverage.</p> <p>Re-vegetation statistics are not to include trees located in areas where trees will be removed in the future (for development, OSD engineering, road widening and the like) and shall be set as required targets within the consent conditions to be confirmed through the submission requirements at existing Condition B86.</p>	<p>The approved development is subject to the site-specific DCP and the controls contained in the Mamre Road Precinct DCP are not relevant to the subject modification application or approved development.</p> <p>In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p>
<p>(h) <u>Staff and Communal Areas</u></p> <p>The provision and design of staff communal areas is to be in accordance with Section 4.2.4 of the MRP DCP.</p>	<p>The approved development is subject to the site-specific DCP and the controls contained in the Mamre Road Precinct DCP are not relevant to the subject modification application or approved development. No change to this aspect of the built form is proposed as part of this modification application.</p>
<p>(i) <u>Signage Estate Entry</u></p> <p>Signage and Estate Entrances is to be in accordance with Section 4.2.8 of the MRP DCP.</p> <p>The applicant is to explain the proposed deletion of the Acoustic barrier shown on Landscape plans Issue S, dated 28.05.2021.</p>	<p>The approved development is subject to the site-specific DCP and the controls contained in the Mamre Road Precinct DCP are not relevant to the subject modification application or approved development. No change to the signage is proposed as part of this modification application.</p> <p>The Acoustic Barrier remains as per the approved plans and Condition B54 of SSD 9522.</p>
2. Development Engineering and Traffic Considerations	
<p>(a) <u>Condition B4</u></p> <p>The removal of the Condition B4 is not supported. It is suggested that the condition be modified as per the below, to align with the recently adopted Mamre Road Precinct Development Control Plan:</p> <p><i>Prior to the issue of a Subdivision Works Certificate for the estate roads, the Certifying Authority shall ensure that access to the development, the internal road intersections and access to each development lot are:</i></p>	<p>Accepted.</p>



Summary of, and response to comments	
Comments	Response
<p>(a) designed for 30m Performance Based Standards (PBS) Level 2 Type B vehicles and tested for a 36.5m PBS Level 3 Type A vehicles.</p> <p>(b) consistent with the most recent version of Austroads Guide to Road Design and TfNSW specifications</p> <p><i>Design plans including turn path templates demonstrating compliance, shall be submitted with the application for a Subdivision Works Certificate.</i></p> <p>This will ensure that future applications or modification applications achieve compliance, and that compliance is demonstrated at Subdivision Works Certificate stage.</p> <p>(b) <u>Condition B6</u></p> <p>The proposed table for the Estate Road Cross Sections align with the recently adopted Mamre Road Precinct DCP regarding road reserve widths, pavement widths and verge widths.</p> <p>Noting Council's strong objection to the deletion of the central median planting, should DPIE support the reduction of widths resulting in deletion or amendment to central medians, it is recommended that an absolute minimum 1.2m wide central median (minimum width to shelter a small sign - Austroads Guide to Road Design Part 4A) be provided at the following locations:</p> <ul style="list-style-type: none"> <li>• Along the full length of Bakers Lane extending from the intersection with Mamre into the North-South Collector Road to approximately Ch 620. The median is required to prevent right turn access into Lots 1-4.</li> <li>• Along the North-South Collector Road at the intersection of Access Road 1 and Access Road 3 (tangent point to tangent point).</li> <li>• Along the North-South Collector Road at the intersection of Access Road 1 and Access Road 2 (tangent point to tangent point).</li> </ul>	
	<p>The approved development is subject to the site-specific DCP and the controls contained in the Mamre Road Precinct DCP are not relevant to the subject modification application or approved development.</p> <p>Medians have been provided in accordance with the Mamre Road Precinct DCP, noting generally medians are not required for any roads within the Estate (based on the confirmed road hierarchy) except at intersection locations.</p> <p>For the north-south road (Road 1), confirmed as a Typical Collector Road (Mamre Road Precinct DCP Figure 12), medians of 0.8m width are required at intersection locations (per Mamre Road Precinct DCP Table 9). The submitted intersections designs for Road 1 and 3, and 1 and 2, have provided 0.8m wide medians in accordance with the Mamre Road Precinct DCP.</p>



Summary of, and response to comments	
Comments	Response
<p>(c) <u>Open Space Edge Road</u></p> <p>Penrith City Council strongly advise that DPIE consider how the Open Space Edge Road will be delivered in accordance with the vision of the DCP, and it is raised that a mechanism shall be put in place to ensure that Development (including the subject proposal) deliver an Open Space Edge Road within the lands identified in the Stage 2 subdivision plan as 'Unresolved Land Use' in accordance with the Mamre Road Precinct Development Control Plan: Part 3.4 Transport Network - Control 25 and designed in accordance with Figures 12 &amp; 16 and Table 9 of the DCP.</p>	<p>The approved development is subject to the site-specific DCP and the controls contained in the Mamre Road Precinct DCP are not relevant to the subject modification application or approved development. The Open Space edge road is not the subject of this modification application.</p>
<p><b>3. Waterways Considerations</b></p> <p>It is not understood that any changes are proposed with respect to the approved stormwater treatment systems. Notwithstanding this, the following matters are raised in relation to water quality:</p> <ul style="list-style-type: none"> <li>Clarification is required in relation to the need for the development to comply with the water quality controls in the Section 2.4 of Mamre Road Precinct DCP, as it is noted that the approved strategy does not. The Mamre Road Precinct DCP has been adopted without savings provisions and in this respect compliance with the Water Management controls in the DCP shall be sought.</li> <li>Submitted documentation indicates that road cross section widths will be reduced resulting in the loss of the 5m central median which is not supported (also addressed above) owing to the loss of opportunity for canopy vegetation and other negative impacts.</li> </ul> <p>Council advises that, in the context of the objectives and vision for the Parkland City, the removal of the central median will result in a loss of opportunities to provide canopy coverage throughout the estate. It is requested that DPIE require the retention of the central median and landscaping.</p>	<p>No change to the approved stormwater treatment systems or infrastructure are proposed as part of this modification application. The approved stormwater infrastructure has been appropriately sized to accommodate the proposed modifications, as addressed in the Civil Engineering documentation provided.</p> <p>Medians have been provided in accordance with the Mamre Road Precinct DCP, noting generally medians are not required for any roads within the Estate (based on the confirmed road hierarchy) except at intersection locations.</p> <p>For the north-south road (Road 1), confirmed as a Typical Collector Road (Mamre Road Precinct DCP Figure 12), medians of 0.8m width are required at intersection location (per Mamre Road Precinct DCP Table 9). The submitted intersections designs for Road 1 and 3, and 1 and 2, have provided 0.8m wide medians in accordance with the Mamre Road Precinct DCP.</p>
<p><b>4. Landscape Considerations</b></p> <p>(a) <u>Submitted Plans</u></p> <p>The applicant shall be required to provide a higher level of detail in support of the application. Detailed and larger scale sections through all boundary interfaces (internal and external) are to be provided for the Department's consideration.</p>	<p>The landscaping details are generally unchanged from the approved development, as the same landscaping setbacks remain.</p>



Summary of, and response to comments	
Comments	Response
	<p>In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p>
<p><b>(b) Mamre Road</b></p> <p>The boundary interface with the upgraded Mamre Rd is not resolved, particularly in relation to level changes, associated materials (retaining walls) and potential for damage to setback plantings during upgrade works.</p> <p>The setback treatment must be informed by preliminary designs for Mamre Road as well as a cut and fill strategy for the road corridor.</p> <p>The DCP should have addressed these points and the Department should therefore develop this landscape character and provide this information to relevant parties.</p> <p>Further, to ensure consistency of landscape character and visual amenity, the setback along the Mamre Road corridor requires a coordinated planting design (including species) that informs each SSD application. It is recommended that this be the case for any other significant road corridor that passes through a number of precincts.</p>	<p>The Mamre Road landscaping details are unchanged from the approved development.</p> <p>In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p>
<p><b>(c) Southern Link Road</b></p> <p>The road and verge arrangement of both the future Southern Link Road and Bakers Lane is not clear. Trees are proposed however there is a lack of information about verge widths, their relationship to other infrastructure proposed in the verge and how these translate to the Southern Link Rd further east (Oakdale precincts).</p> <p>Completed and approved tree species further east should inform this design with a view to achieve a consistent landscape character corridor.</p>	<p>The landscaping details are generally unchanged from the approved development. The verge widths are documented on both the civil engineering and on the landscape drawings submitted.</p> <p>In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p>
<p><b>(d) Streetscapes</b></p> <p>It is vital that the applicant provide high quality landscape plans and details for consideration by the Department, and specifically that the applicant provide greater detail in relation to street tree planting and streetscapes.</p> <p>The high importance of street tree planting in Western Sydney shall be illustrated and be evident in the Department's assessment (and any determination) of the application.</p>	<p>The landscaping details are generally unchanged from the approved development. In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p> <p>The landscaping details are generally unchanged from the approved development.</p>



Summary of, and response to comments	
Comments	Response
<p>Strong regard is to be had of what this development's contribution to canopy cover, heat island impacts, sustainability and streetscape amenity will be.</p> <p>In relation to street tree planting and streetscapes, it is recommended that the Department directly address and quantify the proposal's contribution to the aims and objectives of the overarching strategic planning policies and guidelines requiring elevated streetscape design and minimum targets for canopy cover in this Precinct and for greater Western Sydney.</p> <p>Continuous street tree canopy must be provided in accordance with the adopted DCP as an absolute minimum.</p> <p>Street tree species for each street have not been specified and the applicant's landscape architect is required to liaise with Council's Tree Assets department to agree on species for each road type, according to available rootzone soil volume and likely soil profile and composition.</p> <p>Species diversity for resilience and wayfinding and maximum canopy spread relative to the available rootzone soil volume with mediums sized tree height are Council requirements. The species are to be agreed for all streets in the precinct to enable consistency in the landscape design for each subsequent Warehouse application.</p> <p>Front setbacks and boundary interfaces with the public domain should provide maximum screening and cooling canopy to support street trees that may be smaller due to available rootzone soil volumes.</p> <ul style="list-style-type: none"> <li>• The front setback to Stage 1 Subdivided Lot 2 (cross section FF) does not demonstrate adequate setback planting height – this should be amended from 6m high trees to 10-15m high trees.</li> <li>• The interface with open space along the southern boundary requires resolution, particularly in relation to screening, maintenance access and responsibility.</li> <li>• The boundary and setback planting is not provided along Mamre Road for Lot 9 which is not supported. The planting treatment including width should be continuous along the Mamre Road frontage.</li> </ul>	<p>In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p> <p>The landscaping details are generally unchanged from the approved development. In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p> <p>The Estate will achieve a canopy cover of 16.87% which complies.</p> <p>The landscaping details are generally unchanged from the approved development. In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p> <p>The landscaping details are generally unchanged from the approved development. In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p> <p>The landscaping details are generally unchanged from the approved development. In accordance with Condition B86 of SSD 9522, the detailed Landscape Plan will be prepared in consultation with Council in accordance with the approved development. The proposed modifications will not alter compliance with this.</p>



Summary of, and response to comments	
Comments	Response
<ul style="list-style-type: none"> <li>Similarly, this should be applied to the northern side of Bakers Lane. All street trees should be planted as per Council's online Street and Park Tree Management Plan (as is required by the Mamre Road Precinct DCP). A detailed street tree plant schedule is to be provided and is to be prepared and submitted to DPIE for assessment and inclusion.</li> </ul> <p>(e) <u>Maintenance and operational details</u></p> <p>Details of maintenance access have not been provided and are required.</p> <p>It is raised for the Department's consideration that a plant establishment period of 52 weeks is considered minimum industry practice, not 26 weeks.</p>	
<p>(f) <u>Other landscape matters</u></p> <p>The percentage of canopy coverage for the site (public and private domains) and how this contributes to the 40% target should be calculated and a breakdown provided in the landscape report. This must for part of DPIE's assessment. This information should be provided and built upon for subsequent Warehouse applications.</p>	The Estate will achieve a canopy cover of 16.87%. Including Stage 1 Lots 3, 4 & 5 and the RE1 Recreation zone, the Estate will achieve a total canopy cover of 24.67%.
<p><b>TfNSW Comments</b></p> <p>It is noted that the report has analysed the traffic impacts for the Estate-wide traffic based on the Gross Floor Area (GFA) being 421,820 m<sup>2</sup> and some potential developments to the south of Mamre South Precinct (MSP) (also called the 'Southern Lots'). Whilst it is stated that the report has included the 'southern lots' in the analysis, it is unclear what the 'southern lots' assumed GFA is and whether this was included in the overall assessment of the intersections.</p> <p>Clarification is required to understand what the assumed GFA is of the 'southern lots' and whether the traffic yield was included in the model.</p>	<p>The assumed GFA for the 'southern lots' is 20,000m<sup>2</sup>, as referred in the Response to Submissions traffic addendum supporting the approved Concept Plan (SSD-9522) submission.</p> <p>Traffic associated with this Southern Lots yield was included in the model for years 2026, 2031 and 2036 for Sequence 1A.</p>
<p>The TIA states that at the request of DPIE modelling has been undertaken for the approved Modified Sequence 1A for the years of 2026, 2031 and 2036. Whilst TfNSW appreciates the modelling applied to date, it is unclear what growth rate was applied to the future year models.</p> <p>It is recommended that further clarification is provided as to what growth rates were applied for the years of 2026, 2031 and 2036.</p>	<p>The following background growth rates have been adopted for the purpose of the future year models:</p> <ul style="list-style-type: none"> <li>2% per annum on Mamre Road; and</li> <li>1% per annum on Bakers Lane (and Southern Link Road (SLR) in latter access Sequences).</li> </ul> <p>The traffic profiles for the above growth rates have been within figures 5 - 7 of the submitted Technical Note by Ason Group (P1780r01v7 TN_Kemps Creek SSD-9522 MOD 2).</p>



Summary of, and response to comments	
Comments	Response
	<p>The adopted growth rate is consistent with what has been done previously within the approved SSD-9522 Ason Group TA and the approved SSD-9522-MOD 1 Ason Group Traffic Impact Assessment.</p>
<p>The TIA provides some modelling summary tables however it is unclear from these summaries what the model inputs are. There is no SIDRA movement summaries which provide summarised information in reviewing models. However TfNSW were provided the SIDRA (sid.) files and outputs based on the TIA dated 6 September 2021.</p>	<p>After the meeting with TfNSW held on 14 October 2021, Ason Group provided TfNSW with the SIDRA modelling results (as a zipped file) for the years 2025, 2026, 2031 and 2036 for Sequence 1A.</p> <p>(A copy of the modelling outputs is again provided in Attachment A following changes to model labels, per separate comments below).</p>
<p>In this regard TfNSW provides the following comments on the model provided from the abovementioned TIA:</p> <p>i. The SIDRA movement summaries show that not all demand in the AM peak are able to pass through the network as indicated by the highlighted values. The actual delays / DoS / queues may be worse if they were accounted for. The primary issue appears to be the substantial number of vehicles travelling along Mamre Road. There appears to be almost 1900 vehicles at the North Approach of Mamre Road / Bakers Lane. To provide some perspective, accounting for the 17% HV on this approach would result in a mid-block LoS of E (or even F) at 80km/h using density based LoS from the HCM for freeways. It is suggested that the consultant determine whether the capacity of the road is even able to sustain the forecast demand using HCM / AustRoads prior to modelling.</p>	<p>It is acknowledged that mid-block demands will increase over time and, accordingly, TfNSW has identified the need to widen Mamre Road to 4 lanes in the near future with the provision of up to 6 lanes in the longer term. Broader upgrades to Mamre Road and delivery of other key connections like the Southern Link Road are welcomed in acknowledgement of the future demands forecast.</p> <p>However, delivery of these broader road upgrades is ultimately a matter for TfNSW in its role as the roads authority and is not something that a single Applicant should be reasonably burdened with. Rather than forming a requirement for this specific development in isolation, it is proposed that these broader upgrades to Mamre Road be undertaken as part of the staged infrastructure delivery to support the broader Mamre Road Precinct.</p> <p>Importantly, the removal of Sequence 1B does not compromise the operation of the approved Sequence 1A intersection.</p>
<p>ii. Further to the abovementioned point, as there are clear Mid-block capacity constraints, further justification is needed to understand why the removal of the midblock widening under Sequence 1b is no longer considered necessary.</p>	<p>In addition to the comment above with regards to the infrastructure development under Sequence 1B, it is noted that there are significant challenges and costs associated with widening Mamre Road towards the north as there is an existing Sydney Water Pipeline along with other existing infrastructure within the surrounding area. Due to the high costs of delivery, it is proposed that this cost be reasonably distributed across the Mamre Road Precinct development, so that a single Applicant is not unreasonably burdened by this upgrade, which serves not just the Mamre Road Precinct and this Site but also the broader area noting the regional role that Mamre Road serves. Importantly, the removal of Sequence 1B does not compromise the operation of the approved Sequence 1A intersection.</p> <p>The removal of that commitment from the Applicant is reasonable. However, those upgrades should still be progressed in a timely manner to support future network</p>



Summary of, and response to comments	
Comments	Response
iii. The SIDRA model labelling should be updated to include labels for each lane movement for clarity. In addition model headings should accurately detail what model is being presented.	<p>traffic growth.. Any such upgrade should be reasonably apportioned for the delivery at a broader precinct level as opposed to this one development.</p> <p>The SIDRA model has been amended, as per TfNSW's request and has been shown within Attachment A for review.</p> <p>It is noted that this includes renaming of the models to aid review but no material changes to the model inputs.</p>
iv. The cycletimes shown in the movement summary are not consistent. The cycletimes in this area are linked and therefore should be modelled with this consideration. In this regard as per previous discussions TfNSW would accept a maximum cycletime of 120 seconds for this area. Fixed Time Coordinated / Isolated / optimum etc cycletimes will not be supported.	<p>It is noted that the cycletimes provided within the modelling supporting the approved Sequence 1A (for the year 2025) have not been changed for the future years 2026, 2031 and 2036.</p> <p>As the proposed models for year 2026, 2031 and 2036 are consistent with the approved Sequence 1A (for the year 2025) – with the exception of the background growth factor – additional modelling (with changed cycletimes) for years 2026, 2031 and 2036 is not required. Importantly, the removal of Sequence 1B does not compromise the operation of the approved Sequence 1A intersection.</p>
It is recommended that SIDRA referred to in the TIA dated 6 October 2021 be provided for review (including the Base models). In addition should the SIDRA analysis be consistent with the outputs provided in 6 September 2021 the model is to be updated to consider the above.	<p>After the meeting with TfNSW held on 14 October 2021 (where the review process for the Ason Group TIA dated 6 October 2021 had taken place), Ason Group provided TfNSW with the SIDRA modelling results (as a zipped file) for years 2025, 2026, 2031 and 2036 for review. Importantly, the removal of Sequence 1B does not compromise the operation of the approved Sequence 1A intersection.</p> <p>Nevertheless, further SIDRA models are provided as part of this response – with updated model names per Item 6 – to aid review.</p>
This should include SIDRA output and raw SIDRA (.sip) files. This will enable our modelling and traffic teams to undertake a detailed review of the model to ensure that the inputs are accurate and supported. Further comments can be provided following the review of the models which may require the assessment to be updated.	<p>Previous SIDRA files and SIDRA modelling outputs have been provided to TfNSW for review.</p> <p>The updated SIDRA modelling output results (with the amended labelling) will be provided to TfNSW within Attachment A for review, with the updated SIDRA output files provided separately to TfNSW within an email.</p>
Central Western Team Comments	
Road widths and design proposed by SSD-9522 Mod 2 must comply with the Mamre Road Precinct Development Control Plan 2021.	The road widths as proposed maintain compliance with the Mamre Road Precinct DCP
The proposed revised road widths should ensure that the buildings within the development comply with the landscaped setbacks established within the Mamre Road Precinct DCP 2021.	The development as modified will continue to provide areas for landscaping which are generally consistent with the approved development and site-specific DCP. Where appropriate, landscaped setbacks in excess of the requirements have been



<b>Summary of, and response to comments</b>	
<b>Comments</b>	<b>Response</b>
	provided to compensate for any minor carpark intrusion into the landscape setbacks required by road curves. The overall quantum of landscaping is increased.
DPIE's Chief Engineer should be consulted with respect to road safety and the design of the north-south road.	The complete road design has been provided within the submission of the modification application for review by DPIE's Chief Engineer if required.