



Our reference: ECM: 9347244
Contact: Kate Smith
Telephone: 02 4732 7705

5 November 2020

David Schwebel
Email: David.Schwebel@planning.nsw.gov.au

Dear Mr Schwebel,

Response to Request of SEARs for SSD-10272349 - GPT Industrial Estate at 784-786 Mamre Road Kemps Creek

I refer to notification of the above request for SEAR's received on 22 October 2020. Thank you for providing Council with the opportunity to comment on the proposed development.

The following comments stem from a review of the documentation submitted and are provided for consideration in the preparation of an Environmental Impact Statement:

Planning Considerations

The request for SEAR's on this site is premature. Although the land re-zoning for the Mamre Road Precinct has occurred under State Environmental Planning Policy (Western Sydney Employment Area) 2009, the Department's accompanying Draft Mamre Road Precinct DCP, has not been placed on public exhibition and details related to infrastructure provision and Precinct contributions have not yet been finalised.

In the absence of a site specific DCP and without a contributions plan being in place, Council and the relevant State agencies will not be able to undertake an assessment of the proposal, provide detailed feedback or concurrence on the proposed development as it cannot be certain that the proposed concept masterplan aligns with what is expected to be delivered for this site and/or the broader precinct.

An application should not be prepared and lodged ahead of the Mamre Road Precinct Wide DCP exhibition, as it cannot be determined whether the proposed development will be in conflict or undermine what is planned for, or expected to be delivered, for this site and the broader precinct.

Further, given the surrounding road and infrastructure network has not been determined it is unclear whether the proposed road network design, setbacks and landscaping align with future DCP. It is noted that the Final Mamre Road Structure Plan contained within the Finalisation Report for the Mamre Road



Precinct dated June 2020 indicates possible/potential freight and road access through the subject site. This has not been addressed in the current proposal.

In the event an application progresses despite the above advice the following additional planning related considerations shall be addressed:

- Any application brought forward shall address the proposed isolation of the existing rural residential development to which the subject site wraps around. A more holistic approach to site planning for the precinct should be undertaken to ensure that the precinct is developed in an orderly way with consideration of the impacts of the development on existing rural residential development. Given the minimum lot sizes are not known, it is unclear whether site isolation principles would apply to this arrangement.
- In relation to the reliance on Clause 33A of the SEPP (WSEA) 2009. The application does not only need to demonstrate that the development is not inconsistent with the objectives of both zones but also that the carrying out of the development is desirable due to compatible land use planning, infrastructure capacity and other planning principles relating to the efficient and timely development of land. Again, in the absence of a DCP it is unclear how this will be demonstrated for the proposed development in isolation of what is expected to be delivered for the precinct.
- The site's topography is undulating and the proposed large and level warehouse building pads will need to be considered in the context of broader drainage requirements and integration with adjoining land which are also likely to be developed for employment land uses. The development must avoid large expanses and/or high retaining walls/batters.

Environmental Considerations

The following potential environmental impacts have been addressed and will be included in the future Environmental Impact Statement and are supported:

- Air Quality & Odour Impacts Assessment
- Waste Management Plan
- Unexpected Finds Protocol
- Noise and Vibration Impact Assessment.
- SEPP 33, hazardous development. No dangerous goods are proposed within the Estate including the proposed Warehouse 3. It is recommended that this is conditioned should consent be granted.
- Stormwater Management Plan
- Erosion and sediment control plan

Additional items recommended to be considered within the EIS:

- It is noted that a Contamination Investigation Report will be provided with the EIS. However, the applicant should note the following: a search of Council records shows that Lot 60 was subject to an investigation into unauthorised

earthworks with unauthorised importation of fill material. The nature of the fill material is unknown and Council at this stage is not certain that the site is suitable for the proposed use. It is noted that a *Targeted Environmental Investigation* report has already been conducted and states that the *land is appropriate for industrial use*. It is strongly recommended that the Targeted Environmental Investigation report already completed is provided with the EIS for review and approval.

- Warehouse 3 is proposed to operate 24 hours a day, 7 days per week for *warehouse or distribution uses and other manufacturing industries pursuant to Part 11 of Schedule 1 of State Environmental Planning Policy (State and Regional Development)*. The proposed use is general in nature. The manufacturing industries specified by Part 11 of Schedule 1 of SEPP State and Regional Development lists specific industries including:
 - laboratory, research or development facilities,
 - medical products manufacturing,
 - printing or publishing,
 - textile, clothing, footwear or leather manufacturing,
 - furniture manufacturing,
 - machinery or equipment manufacturing,
 - the vehicle, defence or aerospace industry,
 - vessel or boat building and repair facilities (not including marinas).

Each industry listed has individual-specific, potential pollution impacts including air emissions, waste including contaminated waste water, and noise which, would require specific pollution control devices to mitigate the potential for pollution to occur. The specific proposed use for Warehouse 3 should be identified at the planning phase and supported with the relevant associated environmental, technical reports. Should the applicant not specifically state the proposed use and support the application with the relevant technical reports for the proposed use, it is recommended that Warehouse 3 is conditioned for warehouse and distribution use only, should consent be granted.

Development Engineering Considerations

Stormwater Management Plan

The Stormwater Management Plan report shall address the following items:

- Stormwater drainage for the site must be in accordance with the following:
 - Council's Development Control Plan,
 - *Stormwater Drainage Specification for Building Developments* policy, and
 - *Water Sensitive Urban Design Policy and Technical Guidelines*.
- A stormwater concept plan, accompanied by a supporting report and calculations, shall be submitted with the application.
- The application shall demonstrate that downstream stormwater systems have adequate capacity to accommodate stormwater flows generated from the development. This may require the provision of on-site detention to



reduce stormwater flows or upgrade of stormwater infrastructure to increase capacity.

- Any on-site detention system must be within common property and accessible from the street.
- A water sensitive urban design strategy prepared by a suitably qualified person is to be provided for the site. The strategy shall address water conservation, water quality, water quantity, and operation and maintenance.
- The application shall include MUSIC modelling (*.sqz file) demonstrating compliance with Council's adopted *Water Sensitive Urban Design Policy* and *Technical Guidelines*.
- On lot treatment is to be provided to meet all water quality and water quantity targets. Full details are to be submitted with the application. Penrith City Council will not maintain any estate basins nor accept the dedication of any land for the provision of estate basins.

Flood Impact Assessment

The Flood Impact Assessment report submitted with the application shall address the following items:

- The site is categorised as being flood affected by local overland flow flooding.
- The application must demonstrate that the development proposal is consistent with Council's Development Control Plan for Flood Liable Land.
- Overland flows shall be managed safely through the site and not diverted onto adjoining properties. The development shall not have any adverse impact upon adjoining properties through the damming, concentration or diversion of overland flows.
- All habitable floor levels shall be a minimum of 0.5m above the 1% AEP water surface level.
- Further information regarding Council's Flood Studies is available from Council's website at the following address:
<https://www.penrithcity.nsw.gov.au/services/other-services/floodplain-management>

Traffic Report

The Traffic Report submitted with the application shall address the following:

- A Stage 2 Road Safety Audit is to be submitted with the application.

Civil Plans and Report

The civil plans shall address the following requirements:

- No retaining walls or filling is permitted for this development which will impede, divert or concentrate stormwater runoff passing through the site.
- Earthworks and retaining walls must comply with Council's Development Control Plan.



- The application is to be supported by a geotechnical report prepared by a suitably qualified person for the site and shall address, but not be limited to ground water movement, salinity, contamination.

Subdivision Works

- The application is to be accompanied by a subdivision concept plan.

Traffic Considerations

- This development will need to complying with DCP which yet this has not been finalised and Council do not know its contents including road networks layouts, road cross sections and development parking rates.
- Council require adjusted road cross sections including verge widths in the draft Mamre Precinct DCP.
- Council consider that the Mamre Precinct Masterplan and DCP should be designed to accommodate B-triple trucks yet the documents to date do not.
- Council consider if the undesirable design for only B-double trucks is accepted then there should be an 88B restriction on all lot title limiting access to vehicle no longer than B-double trucks.
- Council consider that there should be no driveway access along Mamre Road or along major internal precinct link roads yet this SSD has driveway access and a temporary road access here.

Council's comments in relation to the subject SEAR's request are predicated by our requirements for the broader Mamre Road Precinct. Once these matters have been finalised the following comments will apply to any new application.

- The development shall be supported by a Traffic Impact Assessment of the proposed development, road and footway network, heavy vehicle and light vehicle access, complying number of heavy vehicle parking, loading and manoeuvring areas and complying numbers of light vehicle staff and visitor parking spaces including compliance with Australian Standards, Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines and Council's Development Control Plans (DCPs) including DCP C10 and/or Mamre Precinct Masterplan, traffic modelling and DCP if applicable.
- The Traffic Impact Assessment shall include the proposed development driveway accesses for heavy vehicles and visitor / staff car parks, sight distance compliances at intersections and driveways, arrangements for waste collection vehicles, emergency / fire service vehicles and other service vehicles, accessible parking and at least 1.8 metre wide accessible pedestrian access from the road frontages and the car park to the office buildings, at least 1.5m wide accessible pedestrian access to other buildings and car parking, car parking and bicycle provision numbers and bicycle facilities, electric vehicle charging station provisions and manoeuvring swept turn paths. This should include compliances with Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines, AS 2890 including parts 1, 2 & 6, AS 1158, NSW Government Walking and Cycling Guidelines and

Council's Development Control Plans and/or Mamre Precinct Masterplan, traffic modelling and DCP if applicable.

The Traffic Impact Assessment, plans and documentation shall include dimensioned plans of the proposed road and footpath networks, accessible paths of travel, driveways, access aisles, loading and vehicle swept path manoeuvring areas and parking spaces and sight distance requirements at intersections and driveways including compliance with Austroads Guidelines, TfNSW (RMS) Technical Directions / Guidelines, AS 2890 including parts 1, 2 & 6, AS 1158, NSW Government Walking and Cycling Guidelines, Council's Development Control Plans.

- Council do not support any direct driveway access to Mamre Road. As such, Council does not support the proposed driveway from warehouse 5 to Mamre Road or the proposed temporary access road to Mamre Road.
- Heavy vehicle access from the public road shall be desirably be physically separated from vehicle access to the car parking areas for safety reasons. Any car vehicular access to the carparking areas that are in conflict with heavy vehicle movements should be removed or addressed in the Traffic Impact Report.
- Plans shall include dimensions of driveways, ramps, aisles, parking spaces, accessible parking, bicycle parking, accessible parking and at least 1.8 metre wide accessible pedestrian access from the road frontage and the car park to the office buildings, at least 1.5m wide accessible pedestrian access to other buildings and car parking, services vehicle manoeuvring and loading areas complying with AS 2890, AS 1428, Council Development Control Plan (DCP) C10, other Council guidelines and Mamre Precinct Development Control Plans if applicable.
- A minimum of two Electric Vehicle Charging Stations (EVCS) are to be provided within the car parking areas of each warehouse development. The charging stations are to be designed to accommodate the requirement of commercially available public vehicles and their required connector types (currently known as Type 1 and Type 2 connectors). A minimum of three additional car parking spaces are to be designed to as to be readily retrofitted as EVCS parking spaces. The installed EVCS car parking spaces are to be signposted and marked as for the use of electric vehicles only and are to be located as close as possible to the building accesses after accessible parking space priority. EVCS are to be free of charge to staff and visitors.
- Complying numbers of secure, all weather bicycle parking, end of journey facilities, change rooms, showers, lockers are to be provided at convenient locations at each warehouse development in accordance with Council Development Control Plan (DCP) C10 Section 10.7, AS 2890.3 Bicycle Parking Facilities and Planning Guidelines for Walking and Cycling (NSW Government 2004).



- Accessible parking is to be provided with accessible paths of travel to the facility in accordance with AS 2890.6.
- All vehicle are to enter and leave in a forward direction.
- Appropriate signage, visible from the public road and on-site shall to be installed to reinforce designated vehicle circulation and to direct staff / delivery vehicle drivers / service vehicle drivers / visitors to on-site parking, delivery and service areas.
- The required sight lines around the driveway entrances and exits are not to be compromised by street trees, landscaping or fencing.
- Sight distance requirements at driveways are to be in accordance with AS 2890.2 Figure 3.3 and Figure 3.4.

Waterway Considerations

A Stormwater Management Strategy will need to be prepared by a suitably qualified professional in support of the development. The strategy shall outline how Water Sensitive Urban Design is being incorporated into the design of the development as well as outline how the receiving waters and environment will be safeguarded from the proposed works. The strategy should address the entire site.

This should include details in to proposed sedimentation and erosion controls as well as to the management of stormwater more generally including, as to how increased volumes, peak flows and pollutants in the increased runoff that is likely to increase as a result of the development, will be managed.

The Water and Soil Management Strategy needs to demonstrate and outline how both surface and groundwater resources as well as dependent ecosystems will be safeguarded for both the construction stages and for the operational stages of the development. The strategy should also outline what is proposed in relation to the dams located on the site.

In developing the strategy, consideration Council's WSUD Policy, WSEA SEPP and the livability and water management principles, that have been identified in the Western City District Plan including the planning priority to *protect and improve the health and enjoyment of the District's waterways* should be considered.

In relation to the management of the riparian corridors and dams located on the site, the following comments are provided:

- With regards to the riparian corridors, any changes to existing drainage lines and streams on the site will need to be in accordance with the requirements of the NSW Natural Resources Assess Regulator. However, a focus on the



retention of existing drainage lines including any dams is preferred. Further to this, a vegetation management plan which meets the Department's guidelines should be prepared which provides detailed guidance on the management requirements for these areas.

- Any impacts to existing creeks should be minimised and where possible the preference should be to retain the natural creek lines and dams as well as restore them to the standards recommended by the Natural Resources Assess Regulator.

Should you wish to discuss any matters further and allow for further dialogue as requested between officers, please do not hesitate to contact me on 4732 7705.

Yours sincerely,

Kate Smith
Acting Development Assessment Coordinator

David Schwebel

From: Melissa Rassack
Sent: Thursday, 5 November 2020 1:14 PM
To: David Schwebel
Cc: William Hodgkinson; Alex Rudd; David Burge; Alejandro Trevino
Subject: RE: Request for input into SEARs - GPT Industrial Estate SSD-10272349
Attachments: 20201030 - UD Comments - Stage 1 Industrial Estate SSD.pptx

Hi David

Thank you for the opportunity to comment. As you are aware, in June this year, the Mamre Road Precinct was zoned for Industrial purposes and the Structure Plan for the Precinct was approved. We are currently working on the draft Development Control Plan (DCP) for the Precinct with the aim of exhibiting it shortly. The DCP will provide detailed design controls for development in the precinct in line with the approved Structure Plan.

In the context of the work undertaken across the precinct and noting DPIE has worked collaboratively with industry, agencies and Council, the following comments are provided:

- The SSD will need to address:
 - the E2 Environmental Conservation zoning through the site. There is an important ecological/riparian corridor connecting Wianamatta-South Creek and Ropes Creek that runs through the site. NRAR should be consulted on design of this corridor.
 - In line with the previous DPIE advice, the riparian corridor should be designed (width and vegetation) to ensure there is sufficient area provided to support the requirements of the local ecosystem. A riparian corridor of 40 metres width should be provided and designed in accordance with the principles of the Water Management Act.
 - Demonstration that the proposed geometry changes to the riparian corridor will address adequate flow of the watercourse. A softer geometry angle may be required to improve this issue.
 - The design treatment of the interface between industrial development and the E2 corridor is important. The design and location of hardstand areas need to avoid negative impacts on the riparian corridor including addressing noise and vibrations from vehicle movements, stormwater runoff and spillage of pollutants.
 - Riparian corridor alignment and its connections to adjoining properties. It is noted that the applicant is seeking to relocate the zoned E2 area. This will only be considered if the above matters are satisfied and NRAR and the Department's Resilient Planning team agree to the approach.
 - The design of proposed retaining walls needs to allow for soft landscape transitions.
 - Layout and connections to the proposed transport network including the Intermodal Terminal and Western Sydney Freight Line.
 - Road design and widths, including application of the indicative precinct wide road network.
 - How bulk earthworks and the road pattern have been prepared to connect to adjoining sites to enable their feasible development for industrial purposes (as proposed in the WSEA SEPP amendment and Structure Plan)
 - Bulk earthworks and flooding impacts.
 - Conservation and protection of areas with heritage and aboriginal heritage significance.
 - Building heights in relation to ridgelines and adjoining rural-residential views.

The draft Mamre Road DCP will provide additional guidance regarding the above matters.

- Any infrastructure, including roads and drainage infrastructure, should be located on industrial land (i.e. not SP2 or E2).
- The SSD must consider the draft Mamre Road Precinct DCP. This includes building controls such as setbacks, built form, landscaping and height controls. Should the SSD progress prior to the finalisation of a precinct-wide DCP for the Mamre Road Precinct, a site specific DCP will be required to be prepared. The DCP will

need to be prepared in accordance with the existing requirements of the WSEA SEPP and the Precinct Structure Plan, in close consultation with the Department. Matters to be addressed are identified in Schedule 4 of WSEA SEPP as well as particular site characteristics such as (but not limited to) landscaping and setback controls, building design. Alternatives to this approach may be considered through ongoing consultation with DPIE.

- The Western Sydney Aerotropolis SEPP is also a matter for consideration. This includes particular development controls regarding referrals and airport safeguarding requirements that extend to this land. The obstacle limitation surface development controls apply, which may impact on building design, including height.
- Agencies to be consulted:
 - TfNSW (Freight and Road)
 - NRAR
 - Sydney Water
 - Airport Operator (where relevant)
 - DPIE (Central Western) team
- State and Local infrastructure contributions will apply. Relevant State agencies and Penrith City Council should be consulted with regarding this matter.

The DPIE Urban Design team have undertaken a preliminary review of the application, and have provided the attached comments for consideration. Supporting urban design analysis should be lodged with the EIS.

Melissa Rassack

Manager, Western Sydney Employment Area (WSEA) and Greater Penrith to Eastern Creek (GPEC)

Greater Sydney, Place and Infrastructure | Department of Planning, Industry and Environment

Level 18, 4 Parramatta Square, Parramatta NSW 2150

www.dpie.nsw.gov.au



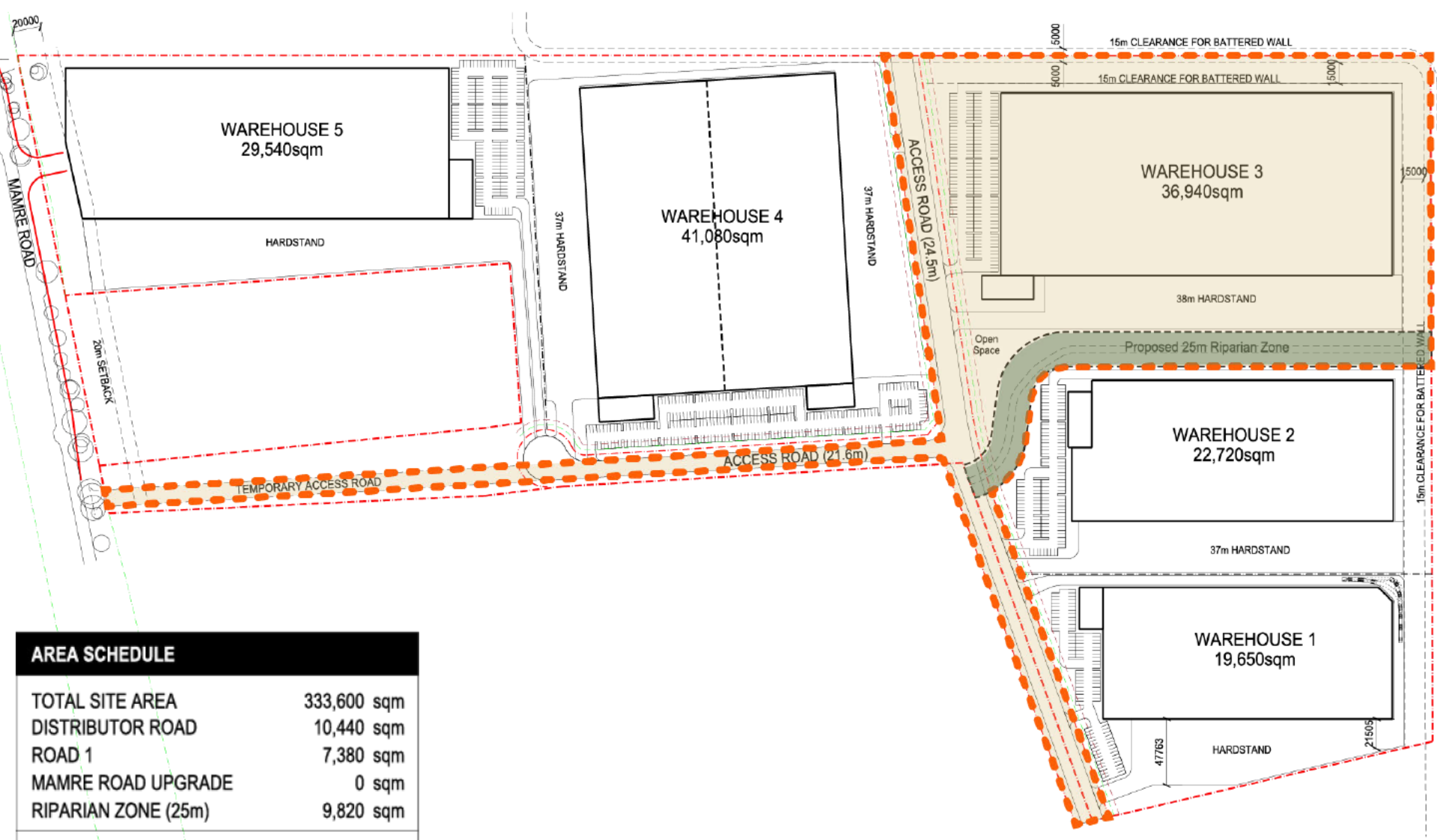
**Planning,
Industry &
Environment**

The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

Greener Places, Great Public Spaces

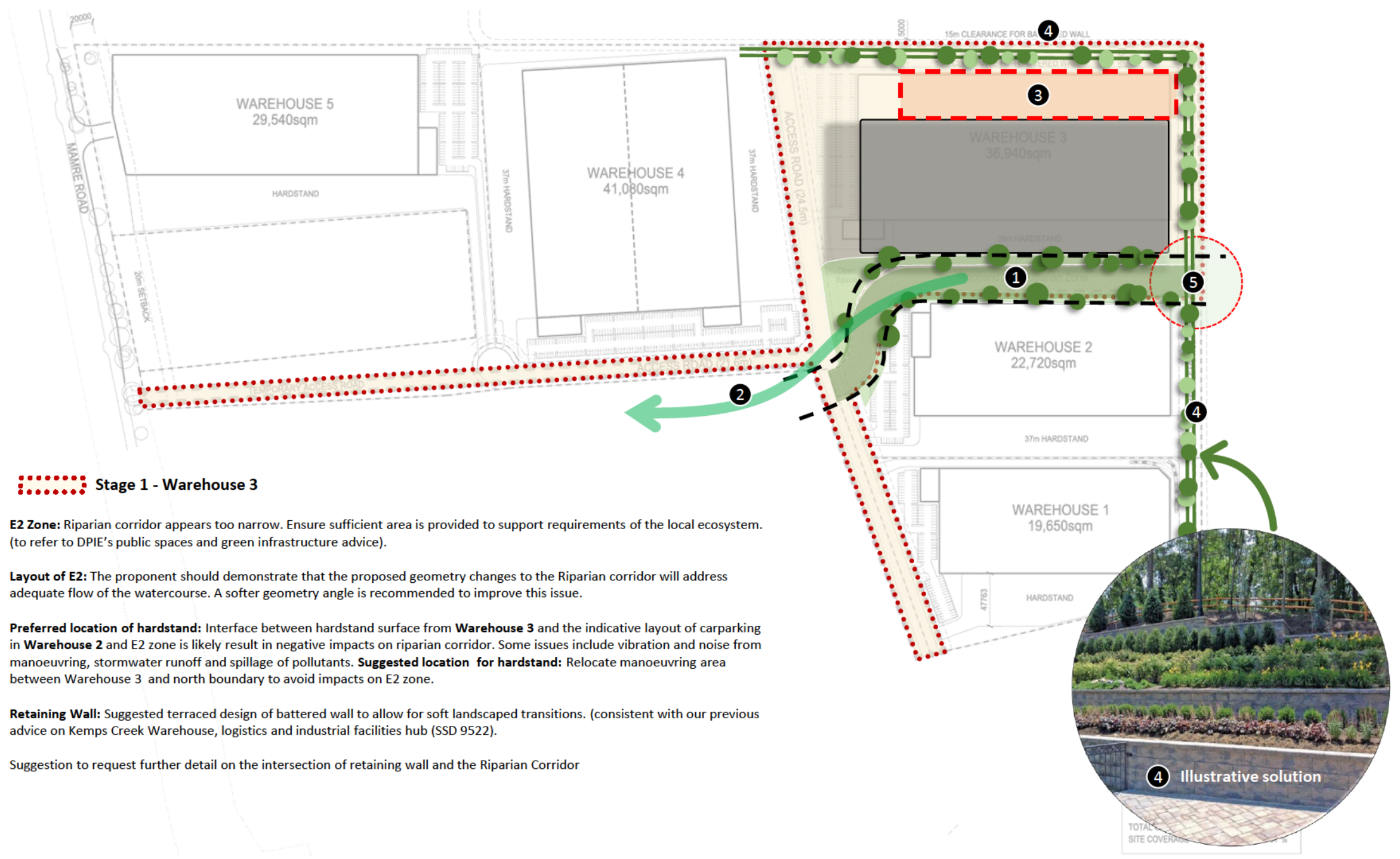


dpie.nsw.gov.au/premiers-priorities



AREA SCHEDULE

TOTAL SITE AREA	333,600 sqm
DISTRIBUTOR ROAD	10,440 sqm
ROAD 1	7,380 sqm
MAMRE ROAD UPGRADE	0 sqm
RIPARIAN ZONE (25m)	9,820 sqm
TOTAL DEVELOPABLE AREA	305,960 sqm
TOTAL WAREHOUSE	149,930 sqm
TOTAL OFFICE (5%)	7,500 sqm
TOTAL GFA	157,430 sqm
SITE COVERAGE	51 %



9 November 2020

David Schwebel
Planning Officer, Industry Assessments
Department of Planning, Industry and Environment

Via email: david.schwebel@planning.nsw.gov.au

Dear Mr Schwebel,

Comments on Request for Secretary's Environmental Assessment Requirements (SEARs) - GPT Industrial Estate (SSD-10272349)

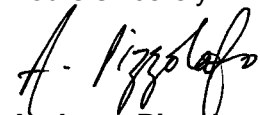
Thank you for the opportunity to provide feedback from the Western Sydney Planning Partnership (the Partnership) about the request for SEARs for the proposed GPT Industrial Estate (SSD-10272349) on land legally described as Lots 59-60 in DP 259135, Kemps Creek.

It is understood that the applicant is seeking to commence a State Significant Development (SSD) approval pathway for a warehouse and distribution centre and that the SEARs will inform the preparation of an Environmental Impact Statement (EIS).

The Planning Partnership is satisfied that the request for SEARs has adequately considered the relevant matters. The applicant has committed to address consistency with the Aerotropolis SEPP as part of the EIS and the proposed technical studies appear to be sufficient to accompany the EIS. Some additional comments have been provided at **Attachment 1**. The Planning Partnership requests to review and comment on any future applications on the site or proposals.

I trust this information has been of assistance. If you have any more questions, please contact Ben Gresham, Senior Planning Officer, Planning Partnership Office on 9860 1576 or via email at ben.gresham@planning.nsw.gov.au.

Yours sincerely



Anthony Pizzolatto
Manager, Western Sydney Planning Partnership

Enc: Attachment 1

Attachment 1 – Detailed comments on SEARS request – SSD-10272349

Strategic Planning Context

The subject site (Lots 59-60 in DP 259135) is located within the Mamre Road precinct of the Western Sydney Aerotropolis Growth Area, being an initial precinct. Most of the site is identified for future employment land in the Western Sydney Aerotropolis Plan (finalised in September 2020) and in the Mamre Road Precinct Plan. The land was recently rezoned from RU2 Rural Landscape zone to IN1 General Industrial zoning under the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP). The proposed warehouse or distribution centre is a use that is permitted with consent under the IN1 zone. Whilst the land is wholly zoned IN1 General Industrial, the Mamre Road Precinct Structure Plan (June 2020) seeks to transition the riparian corridor in the centre of the site to E2 Environmental Conservation. It is noted the proposal has considered this and has sited the proposed warehouse buildings and access roads outside of the riparian corridor and proposed a 25m riparian zone for environmental conservation.

Application assessed against the Western Sydney Aerotropolis State Environmental Planning Policy (Aerotropolis SEPP).

Whilst the land is zoned under the WSEA SEPP, certain provisions of the State Environmental Planning Policy - Western Sydney Aerotropolis 2020 (Aerotropolis SEPP) apply to the site. The Aerotropolis SEPP applies for the purpose of aligning the strategic objectives and Western Sydney Aerotropolis Plan to the site along with airport safeguarding provisions. The Planning Partnership notes the applicant's commitment to address consistency with the Aerotropolis SEPP as part of the EIS.

Part 3 Development controls—Airport safeguards

A key planning objective for the Western Sydney Aerotropolis is to safeguard the 24-hour operations of Western Sydney International (Nancy-Bird Walton) Airport. The SEPP provides further detail on airport safeguarding. It is noted that the subject site is situated north-east of the future Western Sydney International Airport and falls within the Australian Noise Exposure Forecast (ANEF) 20-25 contour. The proposed land use is not a sensitive use and is appropriate within this contour.

The site is partially within the 8 km wildlife buffer zone on the Wildlife Buffer Zone Map of the SEPP and careful consideration must be given to any proposed vegetation (including species selection) or landscaping to minimise wildlife attraction.

Application assessed against the Western Sydney Aerotropolis Plan (WSAP)

The WSAP establishes a vision, objectives and principles for the development of the Aerotropolis. The Mamre Road precinct is identified for industrial uses and may initially support the infrastructure that enables the construction of the Airport and Aerotropolis.

Page 70 of the WSAP outlines the key considerations, strategic outcomes and implementation strategies for the precinct. Generally, the proposal appears to be consistent with these. The proposal must also take into consideration the objectives and principles within the WSAP, contained in the Appendix (pages 92-94). Consideration should also be given to orienting the development towards the riparian corridor and creating usable open space for future workers whilst achieving environmental outcomes and mitigating flood impacts.



OUT20/13032

Bianca Thornton
Planning and Assessment Group
NSW Department of Planning, Industry and Environment

bianca.thornton@planning.nsw.gov.au

Dear Ms Thornton

**GPT Mamre Road Warehouse Estate (SSD 10272349)
Comment on the Secretary's Environmental Assessment Requirements (SEARs)**

I refer to your email of 22 October 2020 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

The following recommendations are provided by DPIE Water and NRAR.

The SEARS should include:

- The identification of an adequate and secure water supply for the life of the project. This includes confirmation that water can be sourced from an appropriately authorised and reliable supply. This is also to include an assessment of the current market depth where water entitlement is required to be purchased.
- A detailed and consolidated site water balance.
- Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.
- Proposed surface and groundwater monitoring activities and methodologies.
- Consideration of relevant legislation, policies and guidelines, including the NSW Aquifer Interference Policy (2012), the Guidelines for Controlled Activities on Waterfront Land (2018) and the relevant Water Sharing Plans (available at <https://www.industry.nsw.gov.au/water>).

Any further referrals to DPIE – NRAR & Water can be sent by email to:
landuse.enquiries@dpi.nsw.gov.au.

Yours sincerely

Alistair Drew
Project Officer, Assessments
Water – Strategic Relations
27 October 2020

5 November 2020

David Schwebel

Planning Officer

Industry Assessments

Department of Planning, Industry & Environment

4 Parramatta Square, Parramatta NSW 2150

RE: Sydney Water input to SEARs for SSD-10272349 GPT Industrial Estate

Thank you for seeking Sydney Water's input on the Secretary's Environmental Assessment Requirements for the abovementioned proposal. We have reviewed the proposal and provide the following comments for your consideration.

Sydney Water requests that the Department of Planning, Industry and Environment include the following Secretary's Environmental Assessment Requirements relating to the provision of water-related services for the subject site:

Water-related Infrastructure Requirements

1. The proponent of development should determine service demands following servicing investigations and demonstrate that satisfactory arrangements for drinking water, wastewater, and recycled water (where required) services have been made.
2. The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed development does not adversely impact on any existing water, wastewater or stormwater main, or other Sydney Water asset, including any easement or property. When determining landscaping options, the proponent should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes and therefore should be avoided.
3. Strict requirements for Sydney Water's stormwater assets (for certain types of development) may apply to this site. The proponent should ensure that satisfactory steps/measures been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets. The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.

Integrated Water Cycle Management

4. The proponent should outline any sustainability initiatives that will minimise/reduce the demand for drinking water, including any alternative water supply and end uses of drinking and non-drinking water that may be proposed, and demonstrate water sensitive urban design (principles are used), and any water conservation measures that are likely to be proposed. This will allow Sydney Water to determine the impact of the proposed development on our existing services and required system capacity to service the development.

If you require any further information, please do not hesitate to contact the Growth Planning Team at urbangrowth@sydneywater.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Kristine Leitch', with a stylized, fluid script.

Kristine Leitch

Growth Intelligence Manager
City Growth and Development, Sydney Water
1 Smith Street, Parramatta NSW 2150



Our ref: DOC20/892052

Senders ref: SSD 10272349 (City of Penrith)

Bianca Thornton
Environmental Assessment Officer
Industry Assessments
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Ms Thornton,

Subject: Request for SEARs for GPT Industrial Estate, Mamre Road Precinct, Western Sydney Employment Area (SSD 10272349)

Thank you for your e-mail received on 28 October 2020, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Request for SEARs for GPT Industrial Estate, within the Mamre Road Precinct within the broader Western Sydney Employment Area.

EES has reviewed the scoping report prepared by Urbis dated 21 October 2020 and provides the following comments and recommendations at **Attachment A**.

Biodiversity

EES recommends that the attached biodiversity requirements be included within the SEARs.

Flooding

EES recommends that the attached flooding requirements be included within the SEARs.

Water and Soils

EES recommends that the attached water and soil requirements be included within the SEARs.

Please that Aboriginal Cultural Heritage issues, including advice regarding SSIs and SSDs, is now managed by Heritage NSW. The new contact for is heritagemailbox@environment.nsw.gov.au.

Should you have any queries regarding this matter, please contact Bronwyn Smith, Senior Conservation Planning Officer on 9873 8604 or bronwyn.smith@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

28/10/20

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation

Attachment A – EES Environmental Assessment Requirements – GPT Industrial Estate, within the Mamre Road Precinct within the broader Western Sydney Employment Area (SSD 10272349)

Biodiversity

1. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the Biodiversity Conservation Act 2017 the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the Biodiversity Conservation Act 2016 (s6.12), Biodiversity Conservation Regulation 2017 (s6.8) and Biodiversity Assessment Method, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations).
2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method.
3. The BDAR must include details of the measures proposed to address the offset obligation as follows:
 - The total number and classes of biodiversity credits required to be retired for the development/project;
 - The number and classes of like-for-like biodiversity credits proposed to be retired;
 - The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules;
 - Any proposal to fund a biodiversity conservation action;
 - Any proposal to conduct ecological rehabilitation (if a mining project);
 - Any proposal to make a payment to the Biodiversity Conservation Fund.

If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.
4. The BDAR must be submitted with all spatial data associated with the survey and assessment as per Appendix 11 of the BAM.
5. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the Biodiversity Conservation Act 2016.

Water and soils

6. The EIS must map the following features relevant to water and soils including:
 - a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
 - b. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method).
 - c. Wetlands as described in s4.2 of the Biodiversity Assessment Method.
 - d. Groundwater.
 - e. Groundwater dependent ecosystems
 - f. Proposed intake and discharge locations
7. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
 - a. Existing surface and groundwater.
 - b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.
 - c. Water Quality Objectives (as endorsed by the NSW Government <http://www.environment.nsw.gov.au/ieo/index.htm>) including groundwater as appropriate that represent the community's uses and values for the receiving waters.
 - d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the [ANZECC \(2000\) Guidelines for Fresh and Marine Water Quality](#) and/or local objectives, criteria or targets endorsed by the NSW Government.
 - e. Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions <http://www.environment.nsw.gov.au/research-and-publications/publications-search/risk-based-framework-for-considering-waterway-health-outcomes-in-strategic-land-use-planning>

8. The EIS must assess the impact of the development on hydrology, including:
- a. Water balance including quantity, quality and source.
 - b. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
 - c. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
 - d. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).
 - e. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.
 - f. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.
 - g. Identification of proposed monitoring of hydrological attributes.

Flooding and coastal hazards

9. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including:
- a. Flood prone land.
 - b. Flood planning area, the area below the flood planning level.
 - c. Hydraulic categorisation (floodways and flood storage areas)
 - d. Flood Hazard.
10. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP, flood levels and the probable maximum flood, or an equivalent extreme event.
11. The EIS must model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios:
- a. Current flood behaviour for a range of design events as identified in 14 above. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.

12. Modelling in the EIS must consider and document:

- a. Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies.
- b. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood, or an equivalent extreme flood.
- c. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazard categories and hydraulic categories
- d. Relevant provisions of the NSW Floodplain Development Manual 2005.

13. The EIS must assess the impacts on the proposed development on flood behaviour, including:

- a. Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure.
- b. Consistency with Council floodplain risk management plans.
- c. Consistency with any Rural Floodplain Management Plans.
- d. Compatibility with the flood hazard of the land.
- e. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land.
- f. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site.
- g. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of riverbanks or watercourses.
- h. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the NSW SES and Council.
- i. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the NSW SES and Council.
- j. Emergency management, evacuation and access, and contingency measures for the development considering the full range of flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the NSW SES.
- k. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.

(END OF SUBMISSION)



DOC20/720698-3

David Schwebel
Planning and Assessment Division
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
Email: david.schwebel@planning.nsw.gov.au

EPA Submission on Planning Advice Request

Dear Mr Schwebel

Thank you for the request for advice from Public Authority Consultation (PAE-10315391), requesting the NSW Environment Protection Authority's (EPA) input on the GPT Industrial Estate located at Lots 59-60 in DP 259135, Kemps Creek (SSD-10272349), Penrith LGA.

Please find the EPA's comments and recommendations in the attached submission.

If you have any questions about this advice, please contact Rhys Inez on (02) 9995 6359 or via email at rhys.inez@epa.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Erin Barker'.

29 October 2020

ERIN BARKER
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Regulatory Operations Metropolitan

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(from outside NSW)

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NSW Environment Protection Authority (EPA) Submission on Secretary's Environmental Assessment Requirements (SEARs) for proposed GPT Industrial Estate (Application SSD-10272349) at Lots 59-60 in DP 259135, Kemps Creek, NSW

Public Authority Consultation (PAE-10315391)
29/10/2020

The EPA has reviewed the following documents:

- Request for Secretary Environmental Assessment Requirements - GPT Industrial Estate (Version 3) – Urbis Pty Ltd – 21/10/2020

The EPA understands the proposal is for:

- Concept masterplan comprising five (5) industrial warehouses, internal road network, 25m riparian zone, building location, GFA, setbacks, car parking and built form parameters.
- Stage 1 consent for:
 - Construction and use of Warehouse 3 for the purposes of other manufacturing industries and/or warehouse and distribution centres which will operate 24 hours/day, seven days/week;
 - Provision of site servicing infrastructure to allow the operation of the industrial unit for warehouse and distribution and/or other manufacturing industries;
 - Bulk earth works;
 - Construction of retaining walls;
 - Internal road network (north-south);
 - Associated carparking;
 - Signage; and
 - Landscaping to the site and adjacent E2 Zone.
- Stage 2 of the Estate, including construction of warehouse buildings 1, 2, 4 and 5 will be subject to separate development applications.

The proposal has not specified what the warehouse buildings or distribution centres will be used for and on the basis of this information the EPA is unsure if licencing of activities to be carried out would potentially be required under the *Protection of the Environment Operations Act 1997*. The [EPA Guide for Licensing](#) should be consulted further on this matter to help guide future development at the site.

The EPA has the following additional comments and recommendations:

1. Matters to be addressed prior to determination

a. Air Quality

The Western City District Plan includes as an objective under a sustainable and resilient city, “*exposure to natural and urban hazards is reduced*”, and states that, “*effective planning can reduce the exposure to natural and urban hazards*”. Urban hazards are identified as including; noise, air pollution and soil contamination.

The NSW Governments submission on the Western Sydney Airport draft EIS and Airport Plan dated the 17 December 2015 stated that the EIS had not fully explored the cumulative air quality impact of the airport in relation to urban development in Western Sydney. It also advised that Western Sydney's geography poses unique problems for air quality because the South Creek Valley traps pollution under certain meteorological conditions.

As stated in the Greater Sydney Regional Plan *A Metropolis of Three Cities*, it states that *although Greater Sydney's air quality is good by world standards, air pollution can exceed national standards at times and continues to have an impact on human health. Even if air pollution is maintained at current levels, population growth in the north west and south west of Greater Sydney, which has greater exposure to air pollution, raises the risk of more people being exposed to pollution.* This will also be further exacerbated with climate change.

The Concept Plan would benefit from a supporting air quality study to help identify management approaches for air quality that can help deliver expected planning outcomes for the precincts that support liveability and public health outcomes and reduces exposure to urban hazards. The greatest benefits to public health come from reducing long-term exposure to air pollution, particularly in highly populated areas. This is not only at a local level but also across Greater Sydney where local strategies are also needed to address cumulative air quality issues.

This can be achieved in several ways:

- Delivering energy efficient buildings
- Minimising private vehicle use by promoting active transport opportunities and access to local services and employment
- Minimise exposure to existing and likely future sources of air pollution
- Minimise industrial and commercial emissions by avoiding new emissions sources and utilising best practice emission controls
- Restricting wood heaters through appropriate controls
- Avoiding land use conflict between sensitive uses and local emissions sources
- Controlling air emissions from construction sites and construction plant/equipment

There is a range of work being undertaken for the planning of the Western Sydney Aerotropolis that could assist to help inform the planning of the precinct. In the developing the study there is a range of EPA guidance available at <https://www.epa.nsw.gov.au/your-environment/air> that should be consulted.

b. Water Quality

The Concept Plan should include strategies to protect and improve the health of the South Creek Catchment to support the vision and aspirations being sought for the Parkland City. In this regard the planning proposal should provide supporting information that can demonstrate that the proposal contributes to the achievement or protection of the NSW Water Quality Objectives (WQO) for the South Creek catchment. These WQOs underpin the South Creek Corridor Strategy that is informing the planning of the WS Aerotropolis. These WQOs provide a framework and benchmarks for the community uses and values of waterways and the water quality that is needed to support these.

The Western City District Plan include actions to improve the health of catchments and waterways through a risk-based approach to managing the cumulative impacts of development. Implementation of this action is supported through application of the OEH/EPA Risk based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions (Risk-based Framework). This Risk-based framework is

helping to inform the planning of the Western Sydney Aerotropolis. To compliment this work, the planning proposal should include information that includes but is not limited to the following:

- Provide an assessment of any potential impacts of the proposal on local hydrology and hydrogeology with a particular focus on water quality using the Risk-based framework to help inform the design of water management and associated infrastructure needs and identify practical, cost effective management actions for supporting waterway health outcomes that reflect the community values and uses of the waterways.
- Provide a concept Stormwater Management Plan outlining the general stormwater management measures for the proposal, including the use of sustainability measures such as Water Sensitive Urban Design to create more resilient and adaptable urban environments supported by green infrastructure. This should also include approaches to reduce impervious areas to provide greater infiltration taking into account any land capability issues such as salinity and land contamination issues if present. This should also include measures for ongoing maintenance including any associated funding approaches for ongoing management for any water management measures.
- Outline opportunities that help deliver integrated water cycle management that includes sustainable water supply, wastewater and stormwater management and reuse and recycling initiatives where it is safe and practicable to do so and provides the best environmental outcome. The proponent may wish to undertake discussions with Sydney Water on current planning occurring in relation to the South Creek Water Factory in servicing the site with treated recycled wastewater.
- Explore opportunities for the stormwater management system to include measures (including retention and capacity) to help respond to any pollution incidents (including fire water) due to the sensitivity of the receiving environment.
- Drive improved sustainability outcomes through design excellence or incentives which incorporates WSUD and sustainable built form (for example, deliver green roofs and walls). This could include promoting the use of green building ratings tools, for example NABERS, Green Star Communities and programs such as Sustainability Advantage etc.
- Written advice should be sought from Sydney Water confirming whether there is adequate capacity in the existing sewerage system to cater for additional loads and the systems environmental performance will not be compromised. This includes sewage overflows from any sewage pumping stations and discharges from any associated sewage treatment plant. The EPA's policy is that for new systems, there should be no pollution of waters as a result of overflows during dry weather and that overflows during wet weather should be avoided.
- A Soil and Water Management Plan should be developed and implemented prior to construction in accordance with the *Managing Urban Stormwater: soils and construction*, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of Services; B. Waste Landfills; C. Unsealed Roads; D. Main Roads; E. Mines and Quarries) (DECC 2008).

c. Noise

It is important that the design of the precinct includes identified measures to manage any noise-based land use conflict issues as such industrial estates can have the potential to generate a range of noise related issues. The potential to address noise issues retrospectively following development can be challenging and expensive to resolve and lead to community complaint, especially as this proposal interfaces with an existing rural residential area.

The EPA considers that implementing noise control at a strategic planning level provides the most effective means of minimising noise impacts on communities. This is best achieved by applying the following hierarchical approach to noise control.

1. Spatial separation of incompatible land use through appropriate zoning and placement of activities and/or introducing barriers, for example non-sensitive buildings to minimise noise-related land use conflicts.
2. Minimising noise emissions at source through best practice selection, design, siting, construction and operation as appropriate.
3. Reducing noise impacts at receivers through best practice design, siting and construction.

Sustainable land use planning and careful design and location of development offers the greatest opportunity to manage noise. Noise generating activities and noise sensitive areas should be separated where practicable. For example, separating incompatible land uses with commercial buildings (including those with night time operations) or recreation space or similar will provide a physical barrier and / or spatial separation. Retrospective control options are usually limited and more expensive.

The Concept Plan should be supported by an acoustical assessment prepared by a suitably qualified acoustical consultant. In developing the assessment, the (*Noise Policy for Industry EPA 2017*) should be consulted. In this case, where a proposal is seeking approval for a Concept Plan for an industrial precinct in the vicinity of a rural residential area, such an assessment provides an opportunity to explore innovative approaches such as a noise management precinct. The benefit of such an approach is it allows new development without causing further noise impacts in areas where noise levels might already be above desired levels. It also has the potential to be used to manage legacy noise issues associated with industrial land that is close to residential areas. Further information is provided in the above EPA Noise Policy for Industry guideline

Guidelines including the *NSW Road Noise Policy* (DECCW, 2011) and the *Rail Infrastructure Noise Guideline* (EPA, 2013) provide guidance in relation to land use planning to manage road and rail noise respectively. These complement planning guidance provided in the *Development near rail corridors and busy roads – interim guideline* (Department of Planning, 2008). These policies and supporting guidelines should also be consulted in the development of the assessment.

Any requirements for the development of a construction management plan should include any noise management requirements being developed in accordance with the *NSW Interim Construction Noise Guideline* (DEC2009).

d. Contaminated Land Management

While the site appears to be currently rural, it may have been used for a range of activities over time that have had the potential to cause land contamination. The State Environmental Planning Policy 55 (SEPP) states that as part of any land use change process the following key considerations should be addressed when preparing an environmental planning instrument:

- Whether the land is contaminated
- If the land is contaminated whether it is suitable in its contaminated state (or will be suitable, after remediation) for all the purposes to which the land will be used; and
- If the land requires remediation; will be made suitable for any purpose for which the land will be used.

A contemporary contamination land assessment should be undertaken to inform the Concept Plan in accordance with the *State Environmental Planning Policy 55 – Remediation of Land and guidelines* made or approved by the NSW EPA under the *Contaminated Land Management Act, 1997*. If historical information suggests that activities have been carried out across the site which may have caused significant site contamination, the services of an accredited site auditor should be engaged.

e. Waste Management

The EPA understands that the Concept Plan may need to be supported by a Development Control Plan. In this regard the *Waste Not Development Control Plan (DCP) Guideline* (EPA 2008) should be consulted. This guideline provides suggested planning approaches and conditions for planning authorities to consider at the development application phase in relation to waste minimisation and resource recovery. This includes consideration of demolition and construction waste and the provision of facilities and services to allow the ongoing separation, storage and removal of waste and recyclables. This guideline is currently being reviewed to be made contemporary.

To inform the development of the Concept Plan a Waste and Resource Recovery Plan (Plan) should be developed by a specialist in environmental and/or waste management. The Plan should include a vision and strategy for how waste and recycling can be managed in an integrated way across the industrial precinct. This includes construction through to the operation stage. The Plan should be informed by the following principles which should guide and underpin the planning and design of waste and resource recovery systems.

Design objective 1: Environmental sustainability and best practice

Developments meet requirements for long-term sustainability and best practice when:

- *systems are designed to maximise waste separation and resource recovery.*
- *innovative and best practice waste management collection systems and technologies are considered and supported where appropriate.*
- *flexibility in design allows for future changes in waste generation rates, materials collected and methods of collection.*

Design objective 2: Effective waste and resource management

Developments achieve effective waste and resource management when:

- *waste services can occur in a seamless and timely manner.*
- *collection points, street widths and street configurations, especially in new subdivisions and precinct developments, allow for waste to be removed safely and conveniently.*
- *the distance residents are required to travel to dispose of waste is minimised.*
- *functional and convenient storage spaces are provided for waste and recycling, including temporary*
- *storage areas for bulky materials like cardboard boxes and bulky household waste.*

Design objective 3: Clean, safe and healthy living environments

Developments protect and enhance the quality of life for the community when:

- *negative impacts on amenity for residents, neighbours and the public, such as visually unpleasant*

- *waste storage areas, noise from waste collection including traffic noise and bad odours, are minimised.*
- *illegal dumping and litter from bins are minimised through good planning and installation of adequate storage and waste recovery infrastructure.*
- *safe and easy to access waste and recycling storage areas are provided for residents, tenants, building managers and collection contractors.*

Design objective 4: Affordability

Developments provide affordable living and working when:

- *careful design and construction prevent costly retrofits.*
- *operational waste management is cost-effective for residents and tenants.*

In addition, the following guidelines should be consulted in any waste planning to support the concept plan:

- *Better Practice for Public Place Recycling*
- *Better Practice Guide for Multi-unit Dwelling*
- *Construction and Demolition Waste: A Management toolkit;*
- *Owner's Guide to Lawful Disposal of Construction and Demolition waste*
- *Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities*

f. General Matters

In developing the site (including during construction) the proponent will need to ensure they comply with the *Protection of the Environment Act 1997* and its supporting regulations.

This concludes the EPA's submission on the proposal.

ERIN BARKER
Unit Head Metropolitan West Operations
Regulatory Operations Metropolitan
Environment Protection Authority

Key Sites and Industry Assessments
Department of Planning, Industry & Environment
GPO Box 39
Sydney NSW 2001

ATTN: Bianca Thornton

Dear Ms Thornton,

**New Request for Advice – GPT Mamre Road Warehouse Estate
(SSD-10272349) (Penrith)**

Thank you for your correspondence via the Major Projects Planning Portal (ref: PAE-10315390) dated 22 October 2020 requesting Transport for NSW (TfNSW) provide input to the Secretary's Environmental Assessment Requirements (SEARs) for the above.

Legislation came into effect on 1 December 2019 that brings together Roads & Maritime Services (Roads and Maritime), and TfNSW. This response reflects the advice from the new organisation.

The following comments are provided for consideration and to be read in conjunction with the suggested Key Issues inputs to the draft SEARs provided in **TAB A**.

Transport for NSW advises that the subject property is within a broad investigation area for the widening of Mamre Road. The investigations have not yet advanced to the stage where options have been defined and accordingly it is not possible at this time to identify if any part of the subject property would be required to accommodate this proposal.

Due to the Covid-19 Pandemic, counts undertaken at the moment may not be representative. Alternative approaches to understand the impact of Covid-19 on traffic patterns should be discussed with TfNSW.

It is suggested the applicant meet with TfNSW to discuss these issues and the options available prior to undertaking a transport impact assessment.

Should you require clarification of any issue raised, please don't hesitate to contact Robert Rutledge, Principal Transport Planner, Land Use Planning and Development at Robert.rutledge@transport.nsw.gov.au.

Yours sincerely



5/11/2020

Mark Ozinga

Principal Manager, Land Use Planning & Development
Customer Strategy and Technology

CD20/08307

Key Issues

Transport and accessibility (operation)

A detailed traffic impact assessment should be prepared and include, but not be limited to, the following:

1. Details of all traffic types and volumes likely to be generated by the proposed development during construction and operation, including a description of haul route origins and destinations, including:
 - a. Daily inbound and outbound vehicle traffic profile by time of day and day of week (if travel patterns differ across the week);
 - b. Site and traffic management plan on how to manage number of vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the surrounding road network;
 - c. Detail the provision of all queuing and staging of vehicles on site. (if applicable)
 - d. Detailed plan of proposed layout of internal road network to demonstrate that the site will be able to accommodate the most productive vehicle types and parking on site in accordance with the relevant Australian Standard and Council's Development Control Plan;
 - e. Under new requirements external road and internal road should be designed to accommodate at least a PBS 3A vehicle (36.5m B-Triple) as the design vehicle for intersection design and lane/shoulder widths, however for storage and stacking considerations it is ideally preferred to accommodate at least a 42 meter PBS Level 3B vehicle.
 - f. Identification of any dangerous goods likely to be transported on arterial and local roads to/ from the site and, if necessary, the preparation of an incident management strategy (If required).
 - g. Demonstrate compliance with the *Western Sydney Employment Area State Environmental Planning Policy*, Part 6; clause 33C; Development within the Mamre Road Precinct; specifically:
 - i. integration with the Mamre Road Precinct dedicated freight corridor (DFC), including provision for access from the DFC to the entire estate. The applicant should continue to liaise with TfNSW to incorporate the DFC;
 - h. Swept path diagrams to demonstrate vehicles entering, exiting and manoeuvring throughout the site;
 - i. An assessment of the forecast impacts on traffic volume generated on road safety and capacity of road network including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model as prescribed by TfNSW (former Roads and Maritime). The traffic modelling should consider the scenarios of year 2026, 2031, 2036 and the year until the facility cease operation. These should include, but not be limited to:
 - i. Mamre Road/Bakers Lane (Aldington Road);
 - ii. Mamre Road/Temporary access road;
 - iii. Mamre Road/Abbotts Road;
 - iv. Mamre Road/Kerrs Road;
 - v. Mamre Road/Mt Vernon Road;
 - vi. Mamre Road/Elizabeth Drive;
 - j. An assessment of potential impact on load road pavement lifespan on Mamre Road;
 - k. To ensure that the above requirements are fully addressed, the traffic impact assessment must properly ascertain the cumulative study area traffic impacts

associated with the development (and any other approved planning proposals and developments in the precinct and surrounds), including the impact on nearby intersections and the need/associated funding for upgrading or road improvement works (if required);

- l. In addition to the above point, any other proposed Mamre Road upgrades relating to the Landowner working group for Mamre Road Precinct, south of the Water NSW pipeline should be considered in the future year modelling;
- m. Details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace travel plan) and the provision of facilities to increase the non-car mode share for travel to and from the site;
- n. An assessment of the accessibility and provision of public transport and active transport;
- o. The preparation of a preliminary Construction Pedestrian and Traffic Management Plan (CPTMP) to demonstrate the proposed management of the impact in relation to construction traffic addressing the following:
 - i. assessment of cumulative impacts associated with other construction activities (if any);
 - ii. an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity;
 - iii. details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process;
 - iv. details of anticipated peak hour and daily construction vehicle movements to and from the site;
 - v. details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle; and
 - vi. details of temporary cycling and pedestrian access during construction.

Drainage and flooding

The EIS shall:

- Provide a flood impact assessment to understand the potential impacts of the development on flood evacuation is to be carried out. To assess the impacts of the proposed development, information for pre and post-development scenarios including modelling of the local overland flows are to be provided to allow assessment of the impact of the development.

Statutory and Strategic Framework

The applicant is to demonstrate that the proposal is generally consistent with all relevant environmental planning instruments including:

- State Environmental Planning Policy (Western Sydney Employment Area) 2009 Amendment
- State Environmental Planning Policy (Infrastructure) 2007
- Draft State Environmental Planning Policy (Western Sydney Aerotropolis)

In addition (but not limited to) the following plans and reports:

- Future Transport 2056 and supporting plans
- Freight and Ports Plan 2018-2023
- Draft Mamre Road Precinct Structure plan - Local Road Network Structure Plan

TAB A – Key Issues Input onto the SEARS for SSD-10272349

- Mamre Road Upgrade Strategic Design Report (2016)
- Mamre Road Upgrade Strategic Design Plans

Consultation

During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners.

In particular you must consult with:

- Transport for NSW



OUT20/13027

22 October 2020

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy St
PARRAMATTA NSW 2150

Bianca.thornton@planning.nsw.gov.au

Dear Mr Betts

Environmental Assessment Requirements– SSD 10272349 – GPT Mamre Road Warehouse Estate, Mamre Road, Kemps Creek (Lots 59 and 60 DP 259135)

Thank you for your correspondence dated 22 October 2020 requesting Environmental Assessment Requirements (EARs) for the above proposal.

The NSW Department of Primary Industries (NSW DPI) Agriculture is committed to the protection and growth of agricultural industries, and the land and resources upon which these industries depend. Important issues are the potential impact on limited agricultural resources and the ability to rehabilitate the land to enable continued agricultural investment.

I note that the land near the site accommodates a poultry farms, horticulture and grazing operations. DPI Agriculture expects that the environmental assessment will detail how the impacts of the proposed development will affect the continued operation of these agricultural land uses.

NSW DPI Agriculture provides recommended EARs (Attachment 1) and a range of publications to assist consent authorities, community and proponents in addressing the recommended EARs (Attachment 2).

Should you require clarification on any of the information contained in this response, please contact me on 0429 864 501 or by email at landuse.ag@dpi.nsw.gov.au

Yours sincerely

Paul Garnett
Agricultural Land Use Planning Officer
Department of Primary Industries - Agriculture

Attachment 1: Environmental Assessment Requirements

Issue	Environmental Assessment Requirement for EIS
Site Suitability	<ul style="list-style-type: none"> • Include a Land Use Conflict Risk Assessment (LUCRA) to identify potential land use conflict with incompatible land uses and sensitive receptors including surrounding agricultural land uses. The LUCRA is to address separation distances and management practices to minimise odour, dust and noise impacts. A LUCRA is described in the DPI Land Use Conflict Risk Assessment Guide. • Include a map to scale showing the above operational and infrastructure details including separation distances from incompatible land uses including agricultural land uses.
Consideration of impacts on agricultural resources and land	<p>Characteristics of Agricultural Land</p> <ul style="list-style-type: none"> • Describe the agricultural land uses on surrounding land in the locality. <p>Impacts on Agricultural Land, Resources and Land Uses</p> <ul style="list-style-type: none"> • Detail the potential impacts from the proposed development on agricultural land and agricultural land uses in the locality. • Consider possible cumulative impacts on surrounding agricultural enterprises and landholders. • Assess impacts on agricultural support services, processing and value adding industries. <p>Measures to mitigate impacts on Agricultural land</p> <ul style="list-style-type: none"> • Demonstrate that all significant impacts on current and potential agricultural developments and resources can be reasonably avoided or adequately mitigated.
Biosecurity	<ul style="list-style-type: none"> • Include a biosecurity (pests, weeds and disease) risk assessment outlining the likely plant, animal and community risks to surrounding agricultural land uses from the proposed development. • Include details of how the proposal will deal with identified biosecurity risks as well as contingency plans for any failures. Include monitoring and mitigation measures for weed and pest management.
Traffic movements	<ul style="list-style-type: none"> • Detail the volume and route of traffic movements for the proposed development and how potential impacts on surrounding agricultural land uses are proposed to be mitigated (eg noise, dust, volume of traffic). This should include consideration the movement of livestock or farm vehicles along / across the affected roads.
Community consultation	<ul style="list-style-type: none"> • Consult with the owners / managers of affected and adjoining agricultural operations in a timely and appropriate manner about; the proposal, the likely impacts and suitable mitigation measures or compensation.

Attachment 2: Guidelines for assessment

Title	Location
Land Use Conflict Risk Assessment Guide	www.dpi.nsw.gov.au/content/agriculture/resources/lup/development-assessment/lucra
Infrastructure Proposals on Rural Land	http://www.dpi.nsw.gov.au/content/agriculture/resources/lup/development-assessment/infrastructure-proposals

HERITAGE NSW – Aboriginal Cultural Heritage - SEARs

Project Name: GPT Mamre Road Warehouse Estate (SSD-10272349), Kemps Creek (Penrith LGA)
SSD/I #: (SSD-10272349)

1. The EIS must identify and describe the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR). This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the [Code of Practice for Archaeological Investigation in NSW](#) (OEH 2010), and be guided by the [Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales](#) (DECCW 2011) and consultation with Heritage NSW.
2. Consultation with Aboriginal people must be undertaken and documented in accordance with the [Aboriginal Cultural Heritage Consultation Requirements for Proponents](#) (DECCW 2010). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.
3. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the ACHAR. The ACHAR must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the EIS must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to Heritage NSW.
4. The assessment of Aboriginal cultural heritage values must include a surface survey undertaken by a qualified archaeologist. The result of the surface survey is to inform the need for targeted test excavation to better assess the integrity, extent, distribution, nature and overall significance of the archaeological record. The results of surface surveys and test excavations are to be documented in the ACHAR.
5. The ACHAR must outline procedures to be followed if Aboriginal objects are found at any stage of the life of the project to formulate appropriate measures to manage unforeseen impacts.
6. The ACHAR must outline procedures to be followed in the event Aboriginal burials or skeletal material is uncovered during construction to formulate appropriate measures to manage the impacts to this material.

NOTE: The process described in the *Due Diligence Code of Practice for the protection of Aboriginal objects in NSW* (DECCW 2010) is not sufficient to assess the impacts on Aboriginal cultural heritage of Major Projects.

Bianca Thornton
Department of Planning, Industry and Environment
320 Pitt Street
SYDNEY NSW 2000

By email: Bianca.Thornton@planning.nsw.gov.au

Dear Ms Thornton

Request for Secretary's Environmental Assessment Requirements (SEARS) for GPT Mamre Road Warehouse Estate (SSD-10272349)

Thank you for your referral dated 22 October 2020 inviting SEARS input from the Heritage Council of NSW on the above State Significant Development proposal.

The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological deposits. Therefore, no referral to the Heritage Council of NSW is required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.

If you have any questions regarding the above advice, please contact Gary Hinder, A/Senior Heritage Assessment Officer, at Gary.Hinder@environment.nsw.gov.au or on 9873 8547.

Yours sincerely



Anna London
A/Senior Team Leader, Customer Strategies
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
29 October 2020


David Schwebel

From: Cornelis Duba <Cornelis.Duba@endeavourenergy.com.au>
Sent: Sunday, 25 October 2020 7:39 PM
To: David Schwebel
Cc: DPE CSE Information Planning Mailbox; Jeff Smith
Subject: NSW Planning, Industry & Environment Request for SEARs SSD-10272349 GPT Industrial Estate, Mamre Road, Kemps Creek
Attachments: EE Drawing 86232 OH lines minimum clearances.pdf; SW08773 Work near underground assets.pdf; SW Work near overhead power lines.pdf; ENA EMF What We Know.pdf; EE Safety Plumbing.pdf; EE Safety on the job.pdf; EE MDI0044 Easements and Property Tenure.pdf; EE Guide for Padmount Substations.pdf; EE General Restrictions OH Power Lines Apr 2020.pdf; EE FPJ 6007 Technical Review Request Aug 2019.pdf; EE FPJ 4603 Permission to Remove Service July 2007.pdf

Hello David

I refer to the your below email of 22 October 2020 regarding the Request for Secretary's Environmental Assessment Requirements (SEARs) for State Significant Development SSD-10272349 for the GPT Industrial Estate being for 'Concept plan and Stage 1 DA for an industrial estate. Stage 1 comprises two warehouses, site-wide bulk earthworks and retaining walls, an internal road network, storm water works, car parking, signage and landscaping' located at Mamre Road, Kemps Creek (Lots 59 & 60 DP 259135) in the Penrith City Local Government Area (LGA). Submissions need to be made to the Department by 5 November 2020.

As shown in the below site plans from Endeavour Energy's G/Net master facility model (and extract from Google Maps Street View) there are:

- No easements over the site benefitting Endeavour Energy (active easements are indicated by red hatching).
- Low voltage and 11,000 volt / 11 kilovolt (kV) high voltage overhead power lines including pole mounted substation no. 8418 (indicated by the symbol ) to the road verge / roadway .
- 11 kV high voltage overhead power lines coming from poles on the road verge to pole mounted substations 18064 and 16421 on the site from which there are low voltage overhead service conductors going to the customer connection point for the existing dwellings / premises on the site (which are likely to become redundant assets if the proposed development proceeds).

Please note the location, extent and type of any electricity infrastructure, boundaries etc. shown on the plan is indicative only. In addition it must be recognised that the electricity network is constantly extended, augmented and modified and there is a delay from the completion and commissioning of these works until their capture in the model. Generally (depending on the scale and/or features selected), low voltage (normally not exceeding 1,000 volts) is indicated by blue lines and high voltage (normally exceeding 1,000 volts but for Endeavour Energy's network not exceeding 132,000 volts / 132 kV) by red lines (these lines can appear as solid or dashed and where there are multiple lines / cables only the higher voltage may be shown). This plan only shows the Endeavour Energy network and does not show electricity infrastructure belonging to other authorities or customers owned electrical equipment beyond the customer connection point / point of supply to the property. This plan is not a 'Dial Before You Dig' plan under the provisions of Part 5E 'Protection of underground electricity power lines' of the Electricity Supply Act 1995 (NSW).

Endeavour Energy would expect that the Planning Secretary would require the applicant to address in utilities as a key issue in the future Environmental Impact Statement, with the following being an example of the 'Utilities' section for other recent notification received by Endeavour Energy from the Department.

14. Utilities

- In consultation with relevant service providers:
 - assess of the impacts of the development on existing utility infrastructure and service provider assets surrounding the site.
 - identify any infrastructure upgrades required off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained.
 - provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.

The following is a combination of the various requests for SEARs for other State Significant Development referred to Endeavour Energy which attempts to capture are the possible 'Utilities' related matters.

Prepare an Infrastructure Management Plan in consultation with relevant agencies / authorities to:

- *address the existing capacity of the site to service the proposed development and any extension or augmentation, property tenure or staging requirements for the provision of utilities, including arrangements for electrical network requirements, drinking water, waste water and recycled water and how the upgrades will be co-ordinated, funded and delivered on time and be maintained to facilitate the development; and*
- *identify the existing infrastructure on the site or within the network which may be impacted by the construction and operation of the proposal and the measures to be implemented to address any impacts on this infrastructure.*

In regard to the 11 kV high voltage overhead power lines traversing the site, although not held under easement (and they only service the sites on which they are located) are protected assets and deemed to be lawful for all purposes under Section 53 'Protection of certain electricity works' of the Electricity Supply Act 1995 (NSW). Essentially this means the owner or occupier of the land cannot take any action in relation to the presence in, on or over the land of electricity works ie. the electricity infrastructure cannot be removed to rectify the encroachment. These protected assets are managed as if an easement is in place – please refer the below point 'Easement Management / Network Access'.

In accordance with Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights', as shown in the following extracts of Table 1 – 'Minimum easement widths', the low voltage overhead power lines require a 9 metre minimum easement width ie. 4.5 metres to both sides of the centre line of the poles / conductors.

Table 1 - Minimum easement widths

	Voltage	Asset Type	Construction	Minimum Easement (m)
Overhead Assets	400V–22kV	Bare Construction	All	9
		ABC		
		CCT		

ABC = Aerial Bundled Cables CCT = Covered Conductor Thick

This easement width in some circumstances may not be warranted ie. depending on the span, type of conductor, access etc. However as a minimum any buildings, structures, etc. whether temporary or permanent must comply with the minimum safe distances / clearances for voltages up to and including 132,000 volts (132kV) for any building or structure (including fencing, signage, flag poles etc.) whether temporary or permanent must comply with the minimum safe distances / clearances for voltages up to and including 132,000 volts (132kV) as specified in:

- Australian/New Zealand Standard AS/NZS 7000 – 2016: ‘Overhead line design’ as updated from time to time.
- ‘Service and Installation Rules of NSW’ which can be accessed via the following link to the Energy NSW website:

<https://energy.nsw.gov.au/government-and-regulation/legislative-and-regulatory-requirements/service-installation-rules> .

As a guide please find attached a copy of Endeavour Energy Drawing ‘Overhead Lines Minimum Clearances Near Structures’. These distances must be maintained at all times to all buildings and structures and regardless of the Council’s allowable building setbacks etc. under its development controls.

Even if there is no issue with the safety clearances to the building or structure, ordinary persons must maintain a minimum safe approach distance of 3.0 metres to all voltages up to and including 132,000 volts / 132 kV. Work within the safe approach distances requires an authorised or instructed person with technical knowledge or sufficient experience to perform the work required, a safety observer for operating plant as well as possibly an outage request and/or erection of a protective hoarding.

If there is any doubt whatsoever regarding the safety clearances to the overhead power lines, the applicant will need to have the safety clearances assessed by a suitably qualified electrical engineer / Accredited Service Provider (please refer to the below point ‘Network Capacity / Connection’. This will require the provision of a detailed survey plan showing the location of the conductors to enable the assessment / modelling of the clearances for which there are software packages available. If the safety clearances are inadequate, either the parts of the building encroaching the required clearances or the overhead power lines will need to be redesigned to provide the required clearances.

Subject to the foregoing and the following recommendations and comments Endeavour Energy has no objection to the State Significant Development.

- Network Capacity / Connection

Endeavour Energy has noted that the Request for SEARs Scoping Report includes the following:

3.2. DEVELOPMENT DESCRIPTION

The key features of the Stage 1 proposal are as follows:

- **Infrastructure:** Provision of a north-south access road, utility services and stormwater works required for the operation of warehouse 3.
- **Utility services:** The final siting and design will incorporate any required augmentation of existing utility services to the proposed development.

4.2.4. State Environmental Planning Policy (Western Sydney Employment Area) 2009 Amendment

Table 1 WSEA SEPP Provisions

Clause	Comment
Clause 25 – Public Utility Infrastructure	All necessary public utility infrastructure and services would be discussed and assessed as part of the EIS, including any potential upgrades of existing services.

4.2.6. State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) aims to facilitate the effective delivery of infrastructure by providing a consistent planning framework that applies across NSW.

The SSDA may be referred to relevant utility service providers to confirm that the siting and layout of the proposed development will not impact on relevant easements and/ or infrastructure corridors.

The Mamre Road Precinct within the Western Sydney Employment Area is initially being supplied from the existing Mamre Zone Substation located at 8 John Morphet Place, Erskine Park (Lot 9 DP 1097134) which has limited spare capacity but is enabling some development to progress ahead of the timeline for upstream utility and civil infrastructure. The establishment of the proposed South Erskine Park Zone Substation within the Oakdale West Estate (currently expected to be available in the fourth quarter of 2022) together with the associated the installation of multiple 22,000 volt 22 kV high voltage feeders will be required to service any significant development along Mamre Road and Aldington Road.

In regard to electricity distribution within the Precinct, the availability of electricity supply to a site is based on a wide range of factors eg. the age and design of the network; other development in the locality utilising previously spare capacity within the local network; the progress of nearby / surrounding sites including electricity infrastructure works eg. a smaller and isolated development that may not of its own accord require a distribution substation may require a substation to facilitate the development and from which the spare capacity is made available to subsequent nearby development.

Non-urban / above ground areas of the network utilising pole mounted substations have comparatively limited capacity of 25 kilovolt amperes (kVA) up to a maximum of 400 kVA. Padmount substations usually utilised in urban areas can accommodate loads from 315 kVA up to 1,500 kVA (typically 500 kVA). Accordingly there is a significant variation in the number and type of premises able to be connected to a substation ie. a single distribution substation may serve one large building, or many homes.

Whilst there are a number of existing pole mounted substations on and near the site, they are not intended or capable of providing electricity supply to a significant urban industrial subdivision / development. As well as the capacity of distribution substations, other factors such as the size and rating / load on the conductors and voltage drop (which can affect the quality of supply particularly with long conductor runs) etc. need to be assessed.

Accordingly an extension and / or augmentation of the existing local network may be required but this will not be determined until a detailed assessment is undertaken. Endeavour Energy's preference is to alert proponents / applicants (and the Department) of the potential matters that may arise as further development of areas continues to occur.

In due course the applicant for the proposed development of the site will need to submit an application for connection of additional load via Endeavour Energy's Network Connections Branch to carry out the final load assessment and the method of supply will be determined. Further details are available by contacting Endeavour Energy's Network Connections Branch via Head Office enquiries on business days on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm or on Endeavour Energy's website under 'Home > Residential and business > Connecting to our network' via the following link:

<http://www.endeavourenergy.com.au/>.

Depending on the outcome of the assessment, any required padmount substation will need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling) by an easement and associated restrictions benefiting and gifted to Endeavour Energy. Please refer to Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'.

Advice on the electricity infrastructure required to facilitate the proposed development can also be obtained by submitting a Technical Review Request to Endeavour Energy's Network Connections Branch, the form for which FPJ6007 is attached and further details (including the applicable charges) are available from Endeavour Energy's website under 'Our connection services'. The response to these enquiries is based upon a desktop review of corporate information systems, and as such does not involve the engagement of various internal stakeholders in order to develop a 'Connection Offer'. It does provide details of preliminary connection requirements which can be considered by the applicant prior to lodging a formal application for connection of load.

Alternatively the applicant should engage an Accredited Service Provider (ASP) of an appropriate level and class of accreditation to assess the electricity load associated with the proposed development. The ASP scheme is administered by Energy NSW and details are available on their website via the following link or telephone 13 77 88:

<https://energy.nsw.gov.au/government-and-regulation/legislative-and-regulatory-requirements/asp-scheme-and-contestable-works> .

Endeavour Energy is urging applicants /customers to engage with an Electrical Consultant prior to finalising plans to in order to assess and incorporate any required electricity infrastructure. In so doing the consideration can also be given to its impact on the other aspects of the proposed development. This can assist in avoiding the making of amendments to the plan or possibly the need to later seek modification of an approved development application.

- Network Asset Design

Endeavour Energy's Company Policy 9.2.5 'Network Asset Design', includes the following requirements for electricity connections to new urban subdivision / development:

5.11 Reticulation policy

5.11.1 Distribution reticulation

In order to improve the reliability performance of and to reduce the operating expenditure on the network over the long term the company has adopted the strategy of requiring new lines to be either underground cables or where overhead is permitted, to be predominantly of covered or insulated construction. Notwithstanding this strategy, bare wire overhead construction is appropriate and permitted in some situations as detailed below.

In areas with the potential for significant overhanging foliage, CCT is used to provide increased reliability as it is less susceptible to outages from wind-blown branches and debris than bare conductors. CCT must only be used in treed² areas as the probability of a direct lightning strike is low. In open areas where the line is not shielded from a direct lightning strike, bare conductors must generally be used for 11kV and 22kV reticulation.

Non-metallic Screened High Voltage Aerial Bundled Cable (NMSHVABC) must be used in areas which are heavily treed and where it is not practicable to maintain a tree clearing envelope around the conductors.

² A "treed" area is one with a substantial number of trees adjacent to the line, in each span. In these situations CCT is used to provide increased reliability as it is less susceptible to outages from wind-blown

5.11.1.1 Urban areas

Reticulation of new residential subdivisions will be underground. In areas of low bushfire consequence, new lines within existing overhead areas can be overhead, unless underground lines are cost justified or required by either environmental or local council requirements.

Where underground reticulation is required on a feeder that supplies a mixture of industrial, commercial and/or residential loads, the standard of underground construction will apply to all types of load within that development.

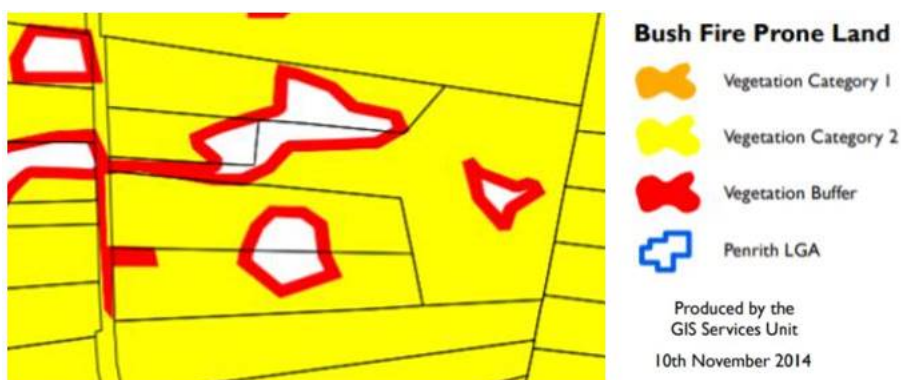
Where ducting is used, adequate spare ducts and easements must be provided at the outset to cover the final load requirements of the entire development plan.

Extensions to the existing overhead 11kV/22kV network must generally be underground. Bare wire will be used for conductor replacements and augmentations except in treed areas where CCT or NMSHVABC must be used.

Extensions to the existing overhead LV network and augmentations must either be underground or ABC. Conductor replacements greater than 100m in route length must utilise aerial bundled cable.

- Bushfire

Endeavour Energy has noted that as shown in the following extract of Penrith City Council LGA – Bush Fire Prone Land Map 10 November 2014 that the majority of the site is bush fire prone. The request for SEARs Scoping Report indicates in Section 7.0 'Expected Deliverables' that a Bushfire Risk Assessment will accompany the future Environmental Impact Statement.



Penrith City Council LGA ~ Bush Fire Prone Land Map

Although commercial and industrial uses are not covered by Chapters 5 to 7 of NSW Rural Fire Service 'Planning for Bush Fire Protection 2019' (PBP), the aim and objectives of PBP still need to be considered and a suitable package of bush fire protection measures should be proposed commensurate with the assessed level of risk to the development. PBP provides the following advice regarding electricity services:

5.3.3 Services – Water, electricity and gas

Intent of measures: to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building.

Table 5.3c

Performance criteria and acceptable solutions for water, electricity and gas services for residential and rural residential subdivisions.

PERFORMANCE CRITERIA		ACCEPTABLE SOLUTIONS	
The intent may be achieved where:			
ELECTRICITY SERVICES	➤ location of electricity services limits the possibility of ignition of surrounding bush land or the fabric of buildings.	➤ where practicable, electrical transmission lines are underground;	
		➤ where overhead, electrical transmission lines are proposed as follows: ➤ lines are installed with short pole spacing of 30m, unless crossing gullies, gorges or riparian areas; and ➤ no part of a tree is closer to a power line than the distance set out in ISSC3 <i>Guideline for Managing Vegetation Near Power Lines</i> .	

The following is an extract of Endeavour Energy's Company Policy 9.1.1 Bushfire Risk Management:

9.1.1 BUSHFIRE RISK MANAGEMENT

1.0 POLICY STATEMENT

The company is committed to the application of prudent asset management strategies to reduce the risk of bushfires caused by network assets and aerial consumer mains to as low as reasonably practicable (ALARP) level. The company is also committed to mitigating, the associated risk to network assets and customer supply reliability during times of bushfire whilst achieving practical safety, reliability, quality of supply, efficient investment and environmental outcomes. The company is committed to compliance with relevant acts, regulations and codes.

Accordingly the electricity network required to service the proposed development must be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a bushfire prone site. In assessing bushfire risk, Endeavour Energy has traditionally focused on the likelihood of its network starting a bushfire, which is a function of the condition of the network. Risk control has focused on reducing the likelihood of fire ignition by implementing good design and maintenance practices. However the potential impact of a bushfire on its electricity infrastructure and the safety risks associated with the loss of electricity supply are also considered.

- Flooding and Drainage

Endeavour Energy has noted the following in the request for SEARs Scoping Report 'Stormwater and flooding' is identified as a 'Key Environmental Issue'.

The electricity network required to service an area / development must be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a flood prone site. Risk control has focused typically on avoiding the threat, but where this is not possible, reducing the negative effect or probability of flood damage to assets by implementing good design and maintenance practices.

Distribution substations should not be subject to flood inundation or stormwater runoff ie. the padmount substation cubicles are weatherproof not flood proof and the cable pits whilst designed to be self-draining

should not be subject to excessive ingress of water. Section 7 'Substation and switching stations' of Endeavour Energy's Mains Construction Instruction MCI 0006 'Underground distribution construction standards manual' provides the following details of the requirements for flooding and drainage in new padmount substation locations.

7.1.6 Flooding and drainage

Substations are to be located such that the risk of flooding or stormwater damage is minimal.

As a minimum the level at the top of the transformer footing, HV and LV switchgear, shall not be lower than the 1:100 year flood level.

All drains within the substation site area or in the vicinity shall be properly maintained to avoid the possibility of water damage to Endeavour Energy's equipment.

In areas where, as determined by the Network Substation Manager, there is a high water table or a heightened risk of flooding, indoor substations will not be permitted.

All materials used in the construction below the substation (ground level) shall be capable of withstanding prolonged immersion in water without swelling or deterioration.



Figure 51 - Example substation raised above 1:100 flood level

- Easement Management / Network Access

The following is a summary of the usual / main terms of Endeavour Energy's electrical easements requiring that the landowner:

- Not install or permit to be installed any buildings, structures or services within the easement site.
- Not alter the surface level of the easement site.
- Not do or permit to be done anything that restricts access to the easement site without the prior written permission of Endeavour Energy and in accordance with such conditions as Endeavour Energy may reasonably impose.

Endeavour Energy's preference is for no activities or encroachments to occur within its easements. However, if any proposed works (other than those approved / certified by Endeavour Energy's Network Connections Branch as part of an enquiry / application for load or asset relocation project) will encroach / affect Endeavour Energy's easements or protected assets, contact must first be made with the Endeavour Energy's Easements Officer, Jeffrey Smith, on business days on direct telephone 9853 7139 or alternately email Jeffrey.Smith@endeavourenergy.com.au or Easements@endeavourenergy.com.au.

Please find attached for the applicant's reference copies of Endeavour Energy's:

- General Restrictions for Overhead Power Lines.
- Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights' which in Section 5.14 'Encroachments on overhead line easements' deals with activities / encroachments within easements.
- 'Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations' in regard to the padmount substation sites that will be required to facilitate the proposed development.

It is imperative that the access to the existing electrical infrastructure on and in proximity of the site be maintained at all times. To ensure that supply electricity is available to the community, access to the electricity infrastructure may be required at any time. Restricted access to electricity infrastructure by maintenance workers causes delays in power restoration and may have severe consequences in the event of an emergency.

This is particularly important where there are poles or towers as in the event of fallen conductors, access to the restring overhead power lines will be required by electricity workers with heavy vehicles, machinery and materials essential for restoring electricity supply.

- Earthing

The construction of any building or structure (including fencing, signage, flag poles, hoardings etc.) whether temporary or permanent that is connected to or in close proximity to Endeavour Energy's electrical network is required to comply with Australian/New Zealand Standard AS/NZS 3000:2018 'Electrical installations' as updated from time to time. This Standard sets out requirements for the design, construction and verification of electrical installations, including ensuring there is adequate connection to the earth. It applies to all electrical installations including temporary builder's supply / connections.

Inadequate connection to the earth to allow a leaking / fault current to flow into the grounding system and be properly dissipated places persons, equipment connected to the network and the electricity network itself at risk from electric shock, fire and physical injury. The earthing system is usually in the form of an earth electrode consisting of earth rods or mats buried in the ground. It should be designed by a suitably qualified electrical engineer / Accredited Service Provider (ASP) following a site-specific risk assessment having regard to the potential number of people could be simultaneously exposed, ground resistivity etc.

For details of the ASP scheme please refer to the above point "Network Capacity / Connection".

In particular appropriate consideration should be provided to the conductivity of the fencing within the easement where there is a possibility it could act as a conductor of electricity and dangerous currents may be carried along the fence. Where conductive / metal fencing is used it must be appropriately earthed eg. the by the use of isolation panels where the fence enters or exits the easement created by the use of timber posts and/or earth electrode installed adjacent to the easement.

- Prudent Avoidance

The electricity industry has adopted a policy of prudent avoidance by doing what can be done without undue inconvenience and at modest expense to avert the possible risk to health from exposure to emissions from electricity infrastructure such as electric and magnetic fields (EMF) and noise which generally increase the higher the voltage ie. Endeavour Energy's network ranges from low voltage (normally not exceeding 1,000 volts) to high voltage (normally exceeding 1,000 volts but not exceeding 132,000 volts / 132 kV).

In practical terms this means that when designing new transmission and distribution facilities, consideration is given to reducing exposure and increasing separation distances to more sensitive uses such as residential or schools, pre-schools, day care centres or where potentially a greater number of people are regularly exposed for extended periods of time.

These emissions are usually not an issue but with Council's permitting or encouraging development with higher density, reduced setbacks and increased building heights, but as the electricity network operates 24/7/365 (all day, every day of the year), the level of exposure can increase.

Endeavour Energy believes that irrespective of the zoning or land use, applicants (and Council) should also adopt a policy of prudent avoidance by the siting of more sensitive uses eg. the office component of an industrial building, away from and less susceptible uses such as garages, non-habitable or rooms not regularly occupied eg. storage areas in a commercial building, towards any electricity infrastructure – including any possible future electricity infrastructure required to facilitate the proposed development.

Where development is proposed near electricity infrastructure, Endeavour Energy is not responsible for any amelioration measures for such emissions that may impact on the nearby proposed development.

Please find attached a copy of Energy Networks Association's 'Electric & Magnetic Fields – What We Know' which can also be accessed via their website at <https://www.energynetworks.com.au/electric-and-magnetic-fields> and provides the following advice:

Electric fields are strongest closest to their source, and their strength diminishes rapidly as we move away from the source.

The level of a magnetic field depends on the amount of the current (measured in amps), and decreases rapidly once we move away from the source.

Typical magnetic field measurements associated with Endeavour Energy's activities and assets given the required easement widths, safety clearances etc. and having a maximum voltage of 132,000 volt / 132 kV, will with the observance of these separation distances not exceed the recommended magnetic field public exposure limits.

- Vegetation Management

The planting of large trees near electricity infrastructure is not supported by Endeavour Energy. Particularly for overhead power lines, ongoing vegetation management / tree trimming is a significant network cost and falling trees and branches during storms are a major cause of power outages.

The planting of large trees near electricity infrastructure is not supported by Endeavour Energy. Suitable planting needs to be undertaken in proximity of electricity infrastructure (including any new electricity infrastructure required to facilitate the proposed development). Only low growing shrubs not exceeding 3.0 metres in height, ground covers and smaller shrubs, with non-invasive root systems are the best plants to use. Larger trees should be planted well away from electricity infrastructure (at least the same distance from overhead power lines as their potential full grown height) and even with underground cables, be installed with a root barrier around the root ball of the plant.

Landscaping that interferes with electricity infrastructure may become a potential safety risk, cause of bush fire, restrict access, reduce light levels from streetlights or result in the interruption of supply. Such landscaping may be subject to Endeavour Energy's Vegetation Management program and/or the provisions of the Electricity Supply Act 1995 (NSW) Section 48 'Interference with electricity works by trees' by which under certain circumstances the cost of carrying out such work may be recovered.

- Location of Electricity Easements / Prudent Avoidance

The incorporation of electricity easements into privately owned lots is generally problematic for both Endeavour Energy and the future landowners and requires additional easement management to ensure no uncontrolled activities / encroachments occur within the easement area.

Accordingly Endeavour Energy's recommendation is that whenever reasonably possible, easements be entirely incorporated into public reserves and not burden private lots. Endeavour Energy's preference is to have continuity of its easements over the most direct and practicable route affecting the least number of lots as possible.

This is also in keeping with a policy of prudent avoidance. In practical terms this means that when designing new transmission and distribution facilities, consideration is given to reducing exposure and increasing separation distances to more sensitive uses such as residential or schools, pre-schools, day care centres or where potentially a greater number of people are regularly exposed for extended periods of time.

These emissions are usually not an issue but with Council's permitting or encouraging development with higher density, reduced setbacks and increased building heights, but as the electricity network operates 24/7/365 (all day, every day of the year), the level of exposure can increase.

Endeavour Energy believes that irrespective of the zoning or land use, applicants (and the Department) should also adopt a policy of prudent avoidance by the siting of more sensitive uses eg. the office component of an industrial building, away from and less susceptible uses such as garages, non-habitable or rooms not regularly occupied eg. storage areas in a commercial building, towards any electricity infrastructure – including any possible future electricity infrastructure required to facilitate the proposed development.

Where development is proposed near electricity infrastructure, Endeavour Energy is not responsible for any amelioration measures for such emissions that may impact on the nearby proposed development.

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Electric fields are strongest closest to their source, and their strength diminishes rapidly as we move away from the source.

The level of a magnetic field depends on the amount of the current (measured in amps), and decreases rapidly once we move away from the source.

Typical magnetic field measurements associated with Endeavour Energy's activities and assets given the required easement widths, safety clearances etc. and having a maximum voltage of 132,000 volt / 132 kV, will with the observance of these separation distances not exceed the recommended magnetic field public exposure limits.

- Dial Before You Dig

Before commencing any underground activity the applicant is required to obtain advice from the **Dial Before You Dig 1100** service in accordance with the requirements of the *Electricity Supply Act 1995* (NSW) and associated Regulations. This should be obtained by the applicant not only to identify the location of any underground electrical and other utility infrastructure across the site, but also to identify them as a hazard and to properly assess the risk.

- Demolition

Demolition work is to be carried out in accordance with Australian Standard AS 2601—2001: 'The demolition of structures' as updated from time to time. All electric cables or apparatus which are liable to be a source of danger, other than a cable or apparatus used for the demolition works shall be disconnected ie. the existing customer service lines will need to be isolated and/or removed during demolition. Appropriate care must be taken to not otherwise interfere with any electrical infrastructure on or in the vicinity of the site eg. streetlight columns, power poles, overhead power lines and underground cables etc.

- Removal of Electricity Supply

Approval for the permanent disconnection and removal of supply must be obtained from Endeavour Energy's Network Connections Branch (contact via Head Office enquiries on business days on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm) by Accredited Service Providers (ASP) with the relevant class of Authorisation for the type of work being carried out. The work could involve:

- The disconnection and removal of an underground service cable or overhead service line,
- Removal of metering equipment.

The written request must be submitted to Endeavour Energy using Form FPJ4603 'Permission to Remove Service / Metering by Authorised Level 2 Accredited Service Provider' which must be accompanied by Notification of Service Works (NOSW) forms provided as a result of service work activity performed by a Level 2 ASP. The retailer must also provide written agreement for the permanent removal of supply.

For details of the ASP scheme please refer to the above point 'Network Capacity / Connection'.

- Site Remediation

Endeavour Energy's Environmental Business Partner Section have advised that the remediation of soils impacted by various forms of electricity infrastructure is not uncommon but is usually not significant eg. transformer oil associated with leaking substations, pole treatment chemicals at the base of timber poles etc. The method of remediation is generally the removal of the electricity infrastructure, excavation of any contaminated soils and their disposal at a licensed land fill. The decommissioning and removal of the redundant electricity infrastructure will be dealt with by Endeavour Energy's Network Connections Branch as part of the application for the connection of load for the new development.

If the applicant has any concerns over the remediation of soils impacted by redundant electricity infrastructure they should contact Environmental Business Partner Section via Head Office enquiries on business days on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm.

- Public Safety

Workers involved in work near electricity infrastructure run the risk of receiving an electric shock and causing substantial damage to plant and equipment. I have attached Endeavour Energy's public safety training resources, which were developed to help general public / workers to understand why you may be at risk and what you can do to work safely. The public safety training resources are also available via Endeavour Energy's website via the following link:

<http://www.endeavourenergy.com.au/wps/wcm/connect/ee/nsw/nsw+homepage/communitynav/safety/safety+brochures>.

If the applicant has any concerns over the proposed works in proximity of the Endeavour Energy's electricity infrastructure to the road verge / roadway, as part of a public safety initiative Endeavour Energy has set up an email account that is accessible by a range of multiple stakeholders across the company in order to provide more effective lines of communication with the general public who may be undertaking construction activities in proximity of electricity infrastructure such as builders, construction industry workers etc. The email address is Construction.Works@endeavourenergy.com.au.

- Emergency Contact

In case of an emergency relating to Endeavour Energy's electrical network, the applicant should note the Emergencies Telephone is 131 003 which can be contacted 24 hours / 7 days. Endeavour Energy's contact details should be included in any relevant risk and safety management plan.

I appreciate that not all the foregoing issues may be directly or immediately relevant or significant to the request for SEARs / Development Application. However in keeping with the Department's aim of earlier and better engagement, Endeavour Energy's preference is to alert proponents / applicants of the potential matters that may arise should development within closer proximity of the existing and/or required electricity infrastructure needed to facilitate the proposed development on or in the vicinity of the site occur.

Could you please pass on a copy of this submission and the attached resources to the applicant? Should you wish to discuss this matter, or have any questions, please do not hesitate to contact me or the contacts identified above in relation to the various matters. Due to the high number of development application / planning proposal notifications submitted to Endeavour Energy, to ensure a response contact by email to property.development@endeavourenergy.com.au is preferred.

Due to the current COVID-19 health risk, as many as possible of Endeavour Energy staff are working from home. As a result there is only a small contingent located at the Huntingwood head office for essential operations. Although working from home, access to emails and other internal stakeholders is now somewhat limited and as a result it may take longer than usual to respond to enquiries. Thank you for your understanding during this time.

Yours faithfully

Cornelis Duba

Development Application Specialist

Network Environment & Assessment

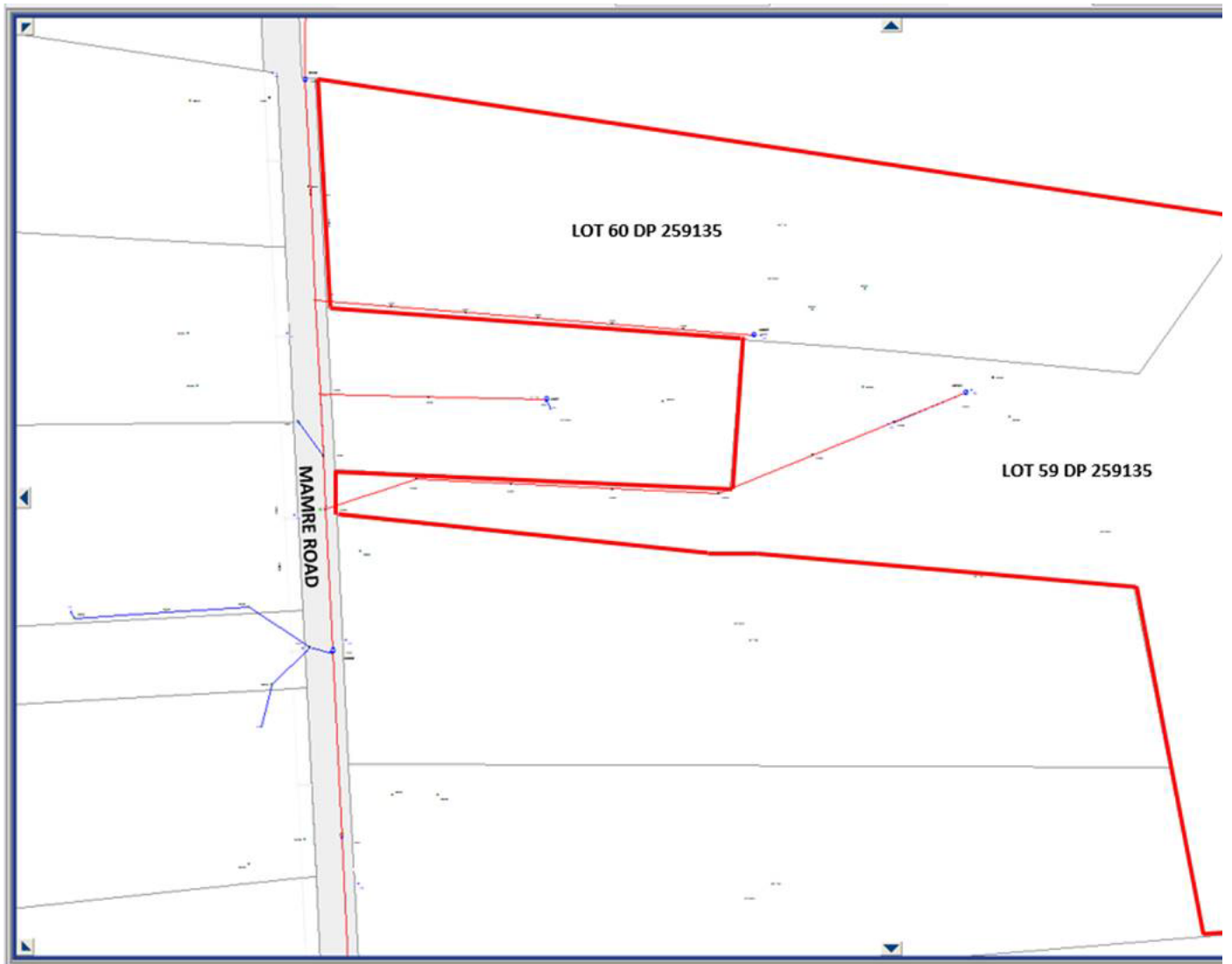
M: 0455 250 981

E: cornelis.duba@endeavourenergy.com.au

51 Huntingwood Drive, Huntingwood NSW 2148

www.endeavourenergy.com.au







POLE MOUNTED SUBSTATION NO. 8418



11 kV HIGH VOLTAGE OVERHEAD POWER LINES GOING TO POLE MOUNTED SUBSTATION NO. 18064



11 kV HIGH VOLTAGE OVERHEAD POWER LINES GOING TO POLE MOUNTED SUBSTATION NO. 16421

From: David Schwebel <David.Schwebel@planning.nsw.gov.au>

Sent: Thursday, 22 October 2020 3:18 PM

To: Records@rfs.nsw.gov.au; engagement@ppo.nsw.gov.au; Fire Safety <FireSafety@fire.nsw.gov.au>; Property Development <Property.Development@endeavourenergy.com.au>; urbangrowth@sydneywater.com.au

Subject: Request for input into SEARs - GPT Industrial Estate SSD-10272349

Dear Sir/Madam

The Department of Planning, Industry and Environment has received a request for Secretary's Environmental Assessment Requirements (SEARs) for the GPT Industrial Estate (SSD-10272349). The proposed development is a State Significant Development under the Environmental Planning and Assessment Act 1979.

Please provide input into the SEARs for the proposal including details of any key issues and assessment requirements by **5 November 2020**.

The Scoping Report can be viewed on the Department's website at <https://www.planningportal.nsw.gov.au/major-projects/project/40446>. You are encouraged to create a login and submit your response via the Major Projects website.

If you have any enquiries, please contact David Schwebel on 9274 6400 or david.schwebel@planning.nsw.gov.au.

Kind regards

David Schwebel

Planning Officer, Industry Assessments

Planning & Assessment | Department of Planning, Industry and Environment



**Planning,
Industry &
Environment**

The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.