

11 December 2020

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

Via email: [david.schwebel@planning.nsw.gov.au](mailto:david.schwebel@planning.nsw.gov.au)

Dear Mr Schwebel,

**Comments State Significant Development Application - 200 Aldington Road Industrial Estate (SSD-10479)**

Thank you for the opportunity to provide feedback from the Western Sydney Planning Partnership (the Partnership) on the State Significant Development (SSD) application for the proposed No.200 Aldington Road Industrial Estate (SSD-10479) on land at No.106-228 Aldington Road, Kemps Creek NSW 2178 (Lots 30-32 in DP 258949 and Lots 20-23 in DP 255560).

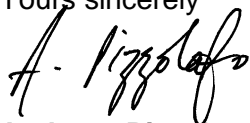
It is understood the Proponent is seeking to approval for a State Significant Development (SSD) application comprising of a staged development including a concept proposal and Stage 1 works comprising the construction, fit-out and operation of a Stage 1 warehouse building and estate-wide earthworks, infrastructure and services.

The Partnership notes that previous comments have been provided by the Planning Partnership dated 13 July 2020 on the request for SEARS. These previous comments primarily focused on the need for the proposal to consider airport operations. The Planning Partnership is pleased to see that most of these matters have been considered in the EIS. Some additional comments have been provided at **Attachment 1**.

In particular, the Partnership is concerned about the concept proposal seeking future development of a warehouse and parking on land within the 1:100-year flood prone area. The Partnership is also concerned about the incompatible land use within land zoned RE2 Private Recreation. The Partnership requests to review and comment on any future applications on the site.

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](mailto:ben.gresham@planning.nsw.gov.au).

Yours sincerely



**Anthony Pizzolato**  
**Manager, Western Sydney Planning Partnership**

## **Attachment 1 – Detailed comments on SSD-100479**

### **Strategic Planning Context**

The subject site at No.106-228 Aldington Road, Kemps Creek NSW 2178 (Lots 30-32 in DP 258949 and Lots 20-23 in DP 255560) is located within the Western Sydney Aerotropolis within the Mamre Road Precinct, which is an initial precinct. Most of the site is identified for future employment land in the Western Sydney Aerotropolis Plan (WSAP) and in the Mamre Road Precinct Plan. The land was recently rezoned to predominantly IN1 General Industrial zoning with part of lots 31-32 of DP 58949 zoned for E2 Environmental Conservation and RE2 Private Recreation 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.

### **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 to the site for the purpose of aligning the strategic objectives and Western Sydney Aerotropolis Plan to the site along with airport safeguarding provisions.

#### 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 Planning Partnership notes the applicant's consideration of the Aerotropolis SEPP in Section 5.2 (National Airports Safeguarding Framework) of the EIS.

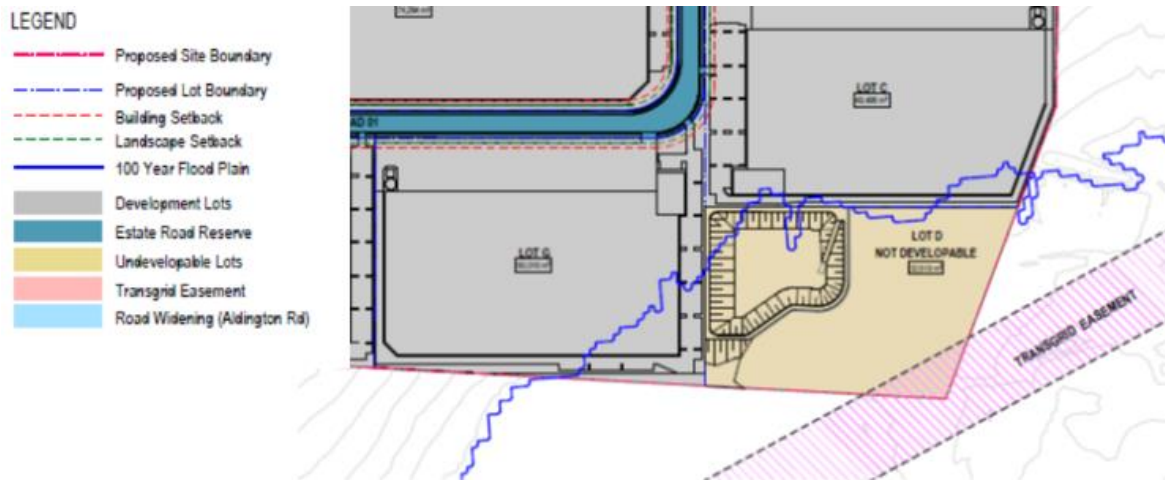
The site is partially within the 8 km wildlife buffer zone on the Wildlife Buffer Zone Map of the SEPP and careful consideration must be given to any proposed vegetation or landscaping to minimise wildlife attraction as per Clause 21 of Part 3 of the Aerotropolis SEPP. Whilst the EIS has referenced this clause, the Partnership is of the view there is a requirement to provide a written assessment of the wildlife that is likely to be present on the land, and the risk of the wildlife to the operation of the Airport. Although most of the site will be developed for warehouse uses, the remaining RE2 and E2 land and proposed landscaping has the potential to attract wildlife and it is recommended that a written assessment be provided as part of the SSD application.

### **Application assessed against the Western Sydney Aerotropolis Plan (WSAP)**

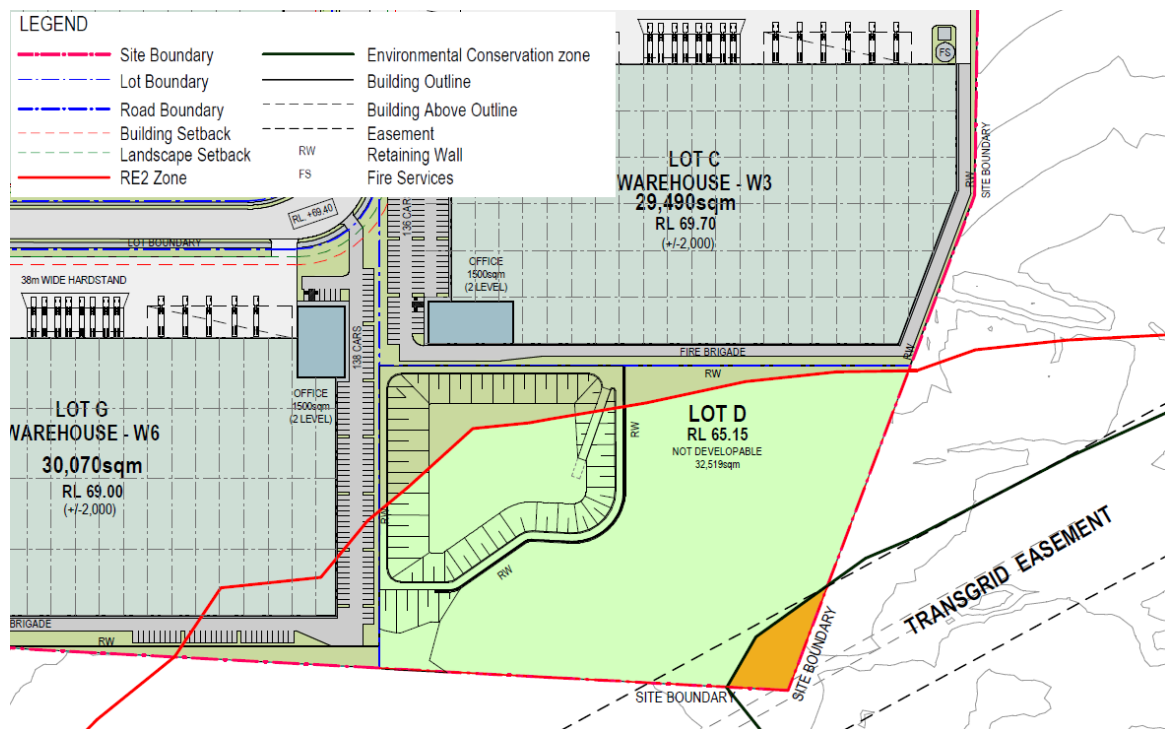
The WSAP establishes a vision, objectives and principles for the development of the Aerotropolis. The Mamre Road precinct is generally identified for industrial uses and may initially support the infrastructure that enables the construction of the Airport and Aerotropolis. Page 70 of the WSAP outlines the key considerations, strategic outcomes and implementation strategies for the Mamre Road Precinct.

Generally, the proposed development appears to be consistent with these. However, the Planning Partnership is concerned about the placement of the building footprints and parking areas partly within the 1:100 flood area under the concept plan, particularly lots C and G (see Figure 1) and the impact such development will have on flood waters. In addition, the Planning Partnership is also concerned about the building footprint of Lot G and associated parking which is partly within land zoned RE2 Private Recreation (see Figure 2). It is recommended that the building footprints be wholly contained within the IN1 General

Industrial zone and above the 1:100-year flood prone land. If approved as per the current application, it could set a precedent across the Aerotropolis which is not desirable and would be inconsistent with the strategic planning objectives of the WSAP.



**Figure 1** - Encroachment of Lots C & G within 1:100 flood area (provided by applicant)



**Figure 2** - Encroachment of Lot G within RE2 zoned area (provided by applicant)

Although the proposed SSD application has taken into consideration the objectives within the WSAP, there appears to be little consideration given to the Aerotropolis planning principles contained in the Appendix (pages 92-94). In particular, the following principles do not appear to have been addressed by the Proponent:

- **SU1** - Retain and enhance natural features such as waterways, vegetation, landform and culturally significant landscapes.
- **SU3** - Retain water in the landscape by maximising appropriate permeable surfaces, reusing water and developing appropriate urban typologies.
- **SU4** - Orient urban development towards creeks and integrate into the landscape through quality open space, a high degree of solar access and tree canopy.

- **SU15** - Plan for compatible land uses within the floodplain, provide safe evacuation and egress from flood events and consider climate change, culvert blockage and floodplain revegetation.

In addition to the above, consideration should also be given to creating usable open space for future workers whilst achieving environmental outcomes and mitigating flood impacts. It is not clear in the proposed concept plan whether the proposed open space areas would be suitable for the proposed workers on the site or if equitable access would be provided.

**END OF COMMENTS**