



5 July 2019

Mr William Hodgkinson
Senior Environmental Assessment Officer
Industry Assessments
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Hodgkinson

State Significant Development proposal- 657-769 Mamre Road, Kemps Creek

The State Significant Development (SSD) proposal for 657-769 Mamre Road in Kemps Creek was the subject of a meeting between the proponent and the Greater Sydney Commission (the Commission) officers in December 2018. Consultation with the Commission was requested by the proponent as required by the Secretary's Environmental Assessment Requirements (SEARS) issued by the former Department of Planning and Environment. A number of plans were viewed at the meeting that indicated the extent and type of development proposed in broad terms.

Further to the meeting and review of the material circulated, the Commission furnished commentary on the proposal outline in the form of Contact Meeting Record setting out summary comments on the proposal with respect to the Greater Sydney Region Plan (GSRP), in particular Objective 26 and Western City District Plan (WCDP), which was subsequently circulated to both the proponent and DPIE.

The Commission's summary comments noted that

"the Commission is not supportive of proposals being lodged and assessed within the South Creek catchment prior to critical catchment wide water cycle management studies being completed as this may pre-empt appropriate urban development consistent with the objectives of the Greater Sydney Region and Western City District Plans. This would apply to the above application as it is largely within the South Creek Precinct and proposes significant development within the PMF and 1:100 flood area".

Further...

"...the Commission and INSW would have significant concerns with respect to projects that propose urban development in areas currently identified as 'nonurban' prior to the above investigations being completed in mid- 2019".

The Commission has reviewed the SSD documentation and believes that the proposal is essentially similar in extent and type to that presented to the Commission at the meeting of December 2018, and accordingly remains premature pending completion of the catchment wide studies.



The Commission considers that the concerns it raised previously in the December consultation meeting do not appear to have been satisfactorily addressed.

The significant concerns with the extent of urban development within the South Creek Precinct identified as Non-Urban therefore remain. Should the subject site be removed from the Land Use and Infrastructure Implementation Plan (LUIIP) and South Creek Precinct, it should be noted that the South Creek objectives set out in the GSRP and WCDP would still apply to the site and that the GSRP is government policy.

The current SSD document includes further detail than the outline concept that was subject to consultation in December 2018. This includes detailed subdivision and earthworks information and preliminary architectural concepts. The comments below respond to this detail with respect to the GSRP and WCDP:

Extent of fill

The subdivision plan proposes filling the entire PMF area, as well as the majority of the 1:100-year flood area within the subject site. This would locate urban development within the South Creek Precinct identified in the Aerotropolis Stage 1 LUIIP as non-urban, recognising its important role as part of the South Creek Precinct (refer Figure 16 on page 92 of the EIS). In addition to extinguishing a large area of potential Parkland, it would effectively sever the South Creek Spine, the central liveability element of the Parkland City, disconnecting the Parkland Spine within the LUIIP area from the Parkland Spine to the north within the Greater Penrith to Eastern Creek (GPEC) Investigation Area (refer figure 17 on page 94 of the EIS).

The extent of fill and potential urban development may significantly reduce the potential to *protect and improve the health of waterways; GSRP Objective 25*. Sydney Water is currently undertaking investigations examining the requirements to achieve sufficient flow in the waterways including South Creek. The quantum of fill proposed may significantly impact this work and is premature.

It is important to note that the LUIIP and GPEC growth areas comprise the majority of existing non-built up area within the Western City and have the most potential to deliver the Parkland objectives. This proposal potentially places the Western Parkland City vision, as described in the GSRP as well as the District Plan, at risk of failing to provide the level of liveability for the projected population of 1.5 million of residents by 2056, as well as the 200,000 jobs catalysed by the Western City Airport.

Tree Canopy

The proposal envisages the removal of all remnant vegetation including tree canopy outside from the 11-hectare area to be revegetated, all of which is located within the 1:100 flood zone (which also includes proposed detention basins that it is assumed will exclude any significant canopy within basin areas should they be permitted in the floodplain). This is not consistent with *GSRP Objective 27; Biodiversity is protected, urban bushland and remnant vegetation is enhanced*.

Notwithstanding the comments above with respect to the extent of fill, the subdivision layout outside the 1:100 itself could be amended to preserve existing trees to create a superior



environment in keeping with the Parkland City objectives, consistent with GSRP *Objective 30: Urban tree canopy cover is increased.*

Public Domain Framework

The street plan should create a permeable and walkable network including public access along the South Creek edge, connected more broadly to the Green Grid, currently being developed as part of the studies noted above. The current plan consists of a number of culs de sac and does not appear to include public access along the creek edge. This is not consistent with GSRP *Objectives 31 and 32; Public open space is assessable, protected and enhanced; the Green Grid links parks, open spaces, bushland and walking and cycling paths.*

It is not clear at this stage whether the 1:100 floodplain would be accessible with respect to flood hazard prior to further strategic work being undertaken by Sydney Water.

Scenic and Cultural Landscapes

GSRP *Objective 28: Scenic and cultural landscapes are protected* refers to significant areas within the Parkland City including scenic landscapes from the waterways to ridges. While a visual assessment is included that indicates views to immediately adjacent places, there is insufficient broader analysis including topographical analysis of ridges and waterways outside the immediate area to comment on how Objective 28 is addressed.

The foregoing points reflect the Commission's strategic priorities under the Region Plan and District Plan rather than a comprehensive review of all aspects of the State Significant Development Application.

If you require any further information or clarification on any of the above points, please do not hesitate to contact me on 8289 6256 or via email at greg.woodhams@gsc.nsw.gov.au.

We would also appreciate being advised of the outcome of this application.

Yours faithfully

Greg Woodhams
Executive Director, City Planning Projects