



Our reference: ECM: 8723857
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10 July 2019

Department of Planning & Environment
Attn: Jess Fountain
DA Coordinator
Key Sites and Industry Assessments
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SYDNEY NSW 2001

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Dear Ms Fountain,

Notice of Exhibition – Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD 9522) at 657 – 769 Mamre Road, Kemps Creek

I refer to your email dated 5 June 2019 regarding notice of exhibition for Kemps Creek Warehouse, Logistics and Industrial Facilities Hub. Council staff have reviewed the proposal and provide the following comments for your consideration:

Planning:

While a number of the concerns identified within this correspondence relate to technical matters (traffic, stormwater management, noise) these issues raise further additional planning questions as to whether the site is suitably located for the proposed use, particularly regarding access, use of the local and regional road infrastructure, and adverse impact to the local community. In addition to these issues, the following planning considerations are raised;

- The subject site is located to the northern end of land identified as forming part of the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan (LUIIP) – Stage 1: Initial Precincts. The site is identified as being located within two Precinct areas being the South Creek Precinct and the Mamre Road Precinct (with the majority of land within the South Creek Precinct) as identified by the Initial Precinct plan of the LUIIP.

Noting the above, it is considered that supporting the current application as identified by Stages 1, 2 and 3 in its entirety may impact upon the orderly development of the locality as it is considered to raise concerns in relation to the suitability in accordance with Clause 4.15(c) of the Environmental Planning and Assessment Act 1979.

While it is acknowledged that the current identified South Creek Precinct boundary may change pursuant to the release of the final plan, approval of all lots and infrastructure works associated with Stages 1 to 3 is not considered appropriate with approval of the proposal ahead of the release of LUIIP Stage 2: Structure Plan considered to adversely impact the master planning of this area associated with future permissible land use requirements.



In this regard, should any approval be forthcoming, it is considered appropriate that this not be granted for any works associated with Stage 2 and 3 but only be restricted to works within Stage 1, should the Department be of the view that these works (for Stage 1) are not within the expected South Creek Precinct ahead of the release of LUIP Stage 2.

- The proposal is dependent on the position of the future Southern Link Road as identified in the current supporting plans being in its current location. It is noted that the Roads and Maritime Services have not at this present time established that this road will be proportionally located as per the current proposal. This is considered to raise doubt in regard to the identified location of future warehouse and distribution facilities as provided by Stage 1. Further consideration and greater flexibility should be given to the provision of wider buffers being provided to the identified warehouses in relation to the Southern Link Road in lieu of the current uncertainty in relation to the roads position.
- It is not considered that the current proposal has established that the Southern Link Road has been provided with adequate traffic signals to cater for future traffic movement, associated for instance with the identified 4 way traffic movement.
- It is noted that the proposal has identified landscaping setbacks of 4m to Bakers Lane which is significantly smaller than setbacks provided to other identified public road frontages. It is considered appropriate that landscaped front setbacks be provided with a consistent width for the proposal to allow for the potential of an improved streetscape presentation associated with integrated possibilities for landscaping.
- The proposal is not considered to have appropriately clarified the treatment and further extension of Bakers lane to the east of Mamre Road within the subject site, including its alignment with the Southern Link Road and possible closure or treatment in the future. It is considered that the potential does exist for the alignment of Bakers Lane to be changed in the future which at present has not been finalised by the Roads and Maritime Services.

Further to the above, the current proposal has identified a narrow portion of land is to be retained between the proposed Southern Link Road and Bakers Lane. Noting the width of this portion of land, it is not considered economically viable that this may be developed in the future. Further clarification on the treatment of this land is considered appropriate.

- The proposal will provide for substantive cut and fill throughout the subject site noting that the majority of cut is maintained towards the Mamre Road frontage with fill to the proposed lots then extending in a westerly direction. A review of plans has identified in parts the proposed fill extending up from 4m to 4.5m in height from existing natural ground level. The extent of fill provided which is identified to be in the area of 2 million cubic metres is not considered appropriate as it is considered that this may create potential disturbances to overland flow and an immediate visual impact concern to its surrounds. It is not considered that the proposal has provided for appropriate justification for the proposed variances to the existing ground contours. In this regard, the amount of fill provided is also viewed with concern in relation to Clause 7.5 of the Penrith Local Environmental Plan –

‘Protection of scenic character and landscape values’ in which the subject site is identified as being located within.

- The proposal has identified three (3) public accessible roads provided with a north to south orientation to the subject site. It is considered appropriate that these roads be extended at a minimum towards the southern boundary of the subject site to allow for any potential future applications for the adjoining southern neighbour the possibility of connection to these roads. This is considered beneficial in that it would allow for a direct means of access for vehicles entering or leaving lots to use a single intersection on Mamre Road (with its intersection with a future Southern Link Road) rather than creating the possibility of further future intersections onto Mamre Road which should be discouraged and is not in line with desired RMS strategy for this Classified Road. As discussed within this correspondence, consideration should only be given to development (including roads) which will not intervene into the future South Creek Precinct as per the LUIP.
- The proposal has identified the location of an on site detention basin to be positioned in the vicinity of the western boundary alongside South Creek. The location of an OSD Basin in this position is not considered appropriate noting the potential ecological impacts which may be created to the existing creek. In addition, the provision of a basin in this location is considered contrary to the strategic direction and objections envisaged for the South Creek Precinct under the LUIP.
- Should any approval be forthcoming in relation to the current proposal. It is considered that any consent should provide for the satisfaction of Clause 29 – ‘Industrial Release Area—satisfactory arrangements for the provision of regional transport infrastructure and services’ of the State Environmental Planning Policy (Western Sydney Employment Area) 2009. This should include a proposed Voluntary Planning Agreement with monetary contributions to be offered by the applicant and to be applicable towards the provision of regional transport infrastructure and services.

Traffic Matters:

- **Freight Line Corridor**
The Drawing SP-KC1-DA-003 identifies the future Western Sydney Freight Line as a 60m corridor. However, TfNSW’s letter dated 6 September states that the corridor 60-80m. This requires confirmation from TfNSW prior to the approval.
- **Road Classification**
Road Classification for the future Southern Link Road (SLR) extension should be State Road, not a Local Road.
- **Interim Access Scenario**
Currently the timing of the delivery of SLR from the State Government is unknown. Therefore, the applicant has proposed to convert the existing “T” signalised intersection at Bakers Lane/Mamre Road to a “four-way” signalised interim access to the development.

In Table 11 of the report, SIDRA analysis confirms that the intersection of Mamre Road / Bakers Lane would still operate at a LoS F during the PM peak hour and with the Stage 1 development. This clearly demonstrates



that the intersection would require some form of an upgrade to accommodate future traffic demands. The applicant should identify the upgrade and this also requires TfNSW approval.

Furthermore, as the timing of the delivery of the SLR is unknown, the applicant needs to assess the interim scenario access, with full master plan development. Also, it is necessary to identify the future infrastructure upgrades to cater for the full master plan development.

- **SLR/Mamre Road Access**
Since the SLR including the western extension alignment and its intersection with Mamre Road location has not been finalised by the State Government, it is premature to agree in principle to the proposed subdivision layout. The proposed subdivision layout may need adjustment in consultation with the State Government.
- **Left In/Left Out Access**
The proposal has a left in/left out access arrangement to Mamre Road which is contrary to RMS advice on 11 September 2018 which stated that *“Proposed development should have all its access from the Southern Link Road connection”*.
- **Internal Road “NSR2”**
RMS has given close attention to future intersection locations, to provide safe access to and from properties along the Mamre Road corridor upgrade, between M4 and Kerrs Road. To be in line with RMS’ principles, it is imperative that early planning considers alternate access arrangements to and from properties along the Mamre Road corridor. In considering this, the proposed internal road “NSR2” should be extended to the southern boundary of the property. The internal road “NSR2” needs to be designed as a high order industrial road standard and to be functioning as a future collector road.

Engineering Matters:

- The provision of basins and associated infrastructure within the floodway is not supported. Whilst some infrastructure may be suitable below the 1% AEP development, such as water quality infrastructure within the floodway will not be supported.
- The flood impact assessment must also assess the flood impacts to adjacent properties. When off-site flood impacts are assessed it should be considered a minimum 2km upstream and 2km downstream to avoid effects at the boundaries of flood modelling. The assessment shall also take into consideration recent surrounding land development.
- A peer review of the flood modelling and flood impact assessment should be undertaken by an independent flood modelling consultant to ensure the flood modelling undertaken is appropriate.
- An overland flow analysis of the catchment upstream of Mamre Road shall be considered in the overall stormwater management of the site.

- The proposal includes a massively re-engineered solution to the South Creek floodplain and is inconsistent with the natural integrity of the South Creek system. This compromises South Creek, the Western Parkland City's future green spine, particularly in regard to amenity and environmental values
- This type of development, if approved, will set a precedent to the entire South Creek floodplain and hence the natural creek system will be lost. Should the proposal, which is a significantly re-engineered natural creek system method, be implemented across the South Creek System, the integrity of the natural creek system is also compromised.
- The water management functions of the creek should be maintained. It is not considered appropriate to encourage or support the outdated mentality of providing a hard-engineered solution for the creek.
- As previously indicated, any infrastructure within a floodway is not supported as a design solution.
- Any proposed flood storage within flood "Dead storage" to compensate the filling is not supported as this "dead storage" will not provide any flood storage as this will be filled before flooding occurs.
- Proposed Stage 1 has water quality and quantity measures within each lot, the applicant should consider doing the same for proposed Stage 2 development. Council will not permit this infrastructure within Council land.

Biodiversity Matters:

BDAR

- The development will see result in the loss of 12.51 ha of remnant indigenous vegetation on the Subject Site. This include 7.11 ha of Alluvial Woodland in an 'underscrubbed' condition, 4.04 ha of Alluvial Woodland in a 'DNG' condition, and 0.24 ha of Shale Plains Woodland in an 'underscrubbed' condition. The Alluvial Woodland is synonymous with the TEC River-flat Eucalypt Forest and the Shale Plains Woodland is synonymous with the TEC Cumberland Plain Woodland. The direct clearing and subsequent development of the subject land would represent a permanent impact, or loss, of this native vegetation and habitat. A further 0.72 ha of exotic plantings and 86.04 ha of cleared land 'exotic grassland' including only occasional native species would also be impacted by the project.
- A total of 11 hollow bearing trees (HBTs) were identified, most of which were confined to the northern portion of the subject land. A large farm dam is situated in the centre of the subject land and several smaller dams are scattered across the northern and eastern portions of the site.
- Interestingly the BDAR rules out the Southern Myotis, *Myotis macropus* as a candidate species to be ruled out as being surveyed on the site. Myotis are known to use farm dams and there are a number of dams and vegetated areas where this species could potentially move between different habitat

resources. As such Myotis should be assessed as to whether they are utilising available habitat on the site.

- The threatened species *Grevillea juniperina subsp. juniperina* (listed as Vulnerable under the BC Act) is identified as being impacted by the proposal. A total of 29 individuals will be lost.
- Under the Biodiversity Offset Scheme (BOS) the applicant needs to demonstrate how firstly avoid impacts, then minimise and then offset impacts. The BDAR on page .46 claims that the impacts on vegetation have been avoided through considering that a Biodiversity Stewardship (BS) site be established. However, the BS site has not been established as it occurs within the two infrastructure corridors; 60 m freight rail corridor along the northern boundary of the site, adjacent to the Sydney Water pipeline. Reviewing Figure 1.3: Proposed development footprint on page .5. As such the decision process cannot be clearly considered to be understood which has led to the impact being avoided, with a large area of Alluvial Woodland being proposed to be removed, supporting significant habitat features such as hollow bearing trees and with Derived Native Grass (DNG) understory. No impacts have been avoided in the development area other than the area designated as a riparian corridor which contains and OCD Basin to the West and the Riparian Corridor and the Freight Corridor to the North.
- The BDAR provides an Ecosystem credits summary and credit profiles and Species credits summary and credit profiles on pages 53 & 54. I agree with credit requirements to offset the impacts.

Riparian and Groundwater Dependent Ecosystems Report

- The report concludes that aquatic and groundwater dependent ecosystems, key fish habitat and riparian vegetation are present within the South Creek corridor and adjacent riparian zone. Though due to being outside the development footprint it is unlikely future development will significantly impact upon these if appropriate measures to protect this area are implemented. These measures being; Establish appropriate Vegetated Riparian Zones (VRZ), Vegetation Management Plan, Water Sensitive Urban Design.
- Whilst it is agreed that the control measures will help to mitigate some of the impacts, it is disagreed that this development will not negatively impact the aquatic ecosystem in South Creek regarding flow regime changes as a result of hardstand through the proposed development.

Landscape Plan

- In summary for the Cumberland Plain Planting Schedule A is appropriate. The addition of *Eucalyptus amplifolia* Cabbage Gum be incorporated into the planting schedule. The use of *Lophostemon confertus* Queensland Brush Box is a Northern NSW species and is not appropriate for the of a buffer and should be removed from the Landscape Plan.
- The Landscape: Re-vegetation Area plan proposes a planting schedule, whilst I do not disagree with the species list, this needs to be managed under a Vegetation Management Plan prepared by a suitably qualified

ecologist and implement by a bush regenerator with experience in the restoration of the Cumberland Plain.

It is suggested that the proponent give some more consideration to the final design and configuration of the subdivision. There has been no attempt to avoid loss of threatened ecological communities across the proposed development, with all vegetation being proposed to be cleared outside of the required riparian zone for South Creek and offset.

Please note the Penrith DCP C11 Subdivision Clause 4) Vegetation Management particulars:

b) Not more than 10% of the vegetation on any site shall be cleared (or required to be cleared) as a result of any subdivision proposal.

This proposal does not meet the vegetation management objective in the DCP. This coupled with not avoiding biodiversity impacts across most of the site including the loss of two threatened ecological communities Cumberland Plain Woodland listed as Critically Endangered Ecological Community under both the BC Act and EPBC Act and 29 individuals of the threatened species *Grevillea juniperina* subsp. *juniperina* Juniper-leaved Grevillea. As such the proposal is not supportable as it stands.

Environmental Matters:

- A dam dewatering management plan should be prepared for the dewatering of dams located at the site.
- The Environment Team support the proposed sewer connection to St Marys Wastewater Treatment Plant. The Environment Team are not supportive of any on-site sewerage management pump-out system.
- An unexpected finds protocol should be developed with regard to possible contamination at the site.
- A construction noise management plan should be prepared for the works at the site.

Waterway (WSUD) Matters

These comments are based on an understanding the stormwater treatment measures will not be handed over to Council. As such, conditions requiring maintenance of the treatment measures will need to be applied to any approvals. It is noted that no MUSIC modelling was submitted in support of the application, as such I was not able to complete a proper assessment of the performance of the stormwater management systems. However, the Civil Report and concept plans provide some information in relation to the proposed treatment measures.

A review of the information provided indicates that Stage 1 will have on-lot stormwater treatment measures. No detailed information is provided in relation to what measures are proposed. As such, the report does not demonstrate compliance with Council's WSUD Policy requirements. Information on any stormwater treatment system will need to be dealt with at the DA stage of each lot.



Stages 2 and 3 will be treated with on-lot GPTs and with a precinct bioretention basin with a 4,500m² filter area with an extended detention depth of 300mm and filter media depth of 500mm.

The proposed bioretention basin will also have capacity for OSD. The plans show that part of the OSD will be combined with the bioretention storage and in larger flows will store up to 1.2 m above the filter media. In relation to the design of the bioretention basin, the statement made in Section 8.2 of the Civil Report, regarding the design and my agreement to the design depth is incorrect. I have not discussed this proposal and have given no such approval or endorsement to the design. I suggest that the comment be removed from the report. I am also of the view that the bioretention basin has many design issues which will make the long-term maintenance more difficult.

In this regard, it is suggested that the proponent give some more consideration to the final design and configuration of the basin during the detailed design stage. This should include but not be limited to the inlet design and flow configuration, sizing of basin, access provision for maintenance, configuration, and vegetation species to name a few considerations. In this regard, there are many technical design guidelines available to assist in any revised design.

In any, case the ongoing management will sit with the owner of the properties within the estate and will not be handed over to Council for future management.

In summary, no MUSIC Modelling has been submitted in support of the application. However, a review of the commitments made in the stormwater management report generally indicates the proposed stormwater treatment would meet Council's WSUD Policy requirements if fully implemented and maintained.

In summary, all developments in Stage 1 would need to develop stormwater treatment strategies and submit in support of any development application. These would need to be consistent with the commitments made in the Civil Report and meet the requirements of Council's WSUD Policy.

It is recommended that modelling and supporting information on the final basin be submitted for approval prior to the issue of Construction Certificate. In this regard, I have suggested a condition.

The proposed bioretention system shall also be used as a sediment basin until the catchment is developed. This is an important consideration and the bioretention system should not be constructed until a minimum of 90% has been constructed.

In relation to the Water Conservation requirements, the Civil Engineering Report includes a commitment to install an inline rainwater tank on each lot and consider rainwater harvesting and reuse as part of the development of each future lot. I have no objection to this proposed way forward.

It will also be important to develop and implement an Operation and Maintenance plan. In this regard, I have suggested a condition requiring the submission of a manual to Councils for approval, prior to the issue of a Construction Certificate.

Landscape

- Address precinct-wide issues that follow in a precinct plan to be the guideline document for this and future stages.
- The principles in the draft Greener Places Policy from the NSW government have not been applied, in particular consideration of green, blue and grey infrastructure at first design principles
- Sustainability principles are to be embedded into the design, including and addressing Council's Cooling the City Strategy, in particular addressing provision of tree canopy to reduce heat over pavement and pedestrian areas
- Memorable pedestrian connections through the Hub must be addressed to create a comfortable and connected precinct
- The design disregards the interface with surrounding areas and features. Steep embankments do not address visual amenity and maintenance requirements.
- Given South Creek will be a recreation and open space corridor and an asset, the development must address high quality and accessible connections to the corridor whilst respecting the landform and landscape amenity
- Visual:
 - views to the Blue Mountains escarpment must be acknowledged and enhanced through the design (streetscape). Include a viewpoint on the southern link road looking west
 - viewpoints along Mamre Rd in close proximity of the development are to be included to ensure streetscape amenity is high and scale and bulk of built forms is addressed. Viewpoints may include approaching from the north and south, and at the intersection.
 - viewpoints must show ultimate scenarios ie. widened roads, rail corridor
 - screening of service areas from high use areas eg. Mamre Rd is to be effective while planting is immature and ineffective as a screen. This may include creative / public art metal or timber screen solutions
 - Substations screened and sited for reduced visual impact
 - Fencing shall be located within landscaping to reduce visual impact and improve amenity, not along property boundaries
- Provide a public domain plan and manual addressing: Landscape character and vision statements, design objectives, pedestrian and cycle connectivity, street trees and streetscape, furniture, WSUD, footpath treatments, lighting, fencing, changes in level, irrigation, recreation and open space, wayfinding, placemaking, street hierarchy, local landmarks, places to stay, safety, local landscape character, short and long term maintenance schedules with assets register, etc



- Mamre Rd:
 - built form at Lot 21 provides inadequate articulation to the streetscape. By comparison, Lots 51-53 provide improved articulation with opportunity for tree canopy to reduce bulk and scale
 - a 15m landscape setback is an adequate width, not 10m, given the intrusion of parking, internal roads and the steep nature of the setback
 - Mamre Rd / Southern Link Rd intersection: as a key entry to the Hub, carparking areas intrude into spatial opportunity for placemaking at the entry. Carparking should be removed from this primary location and sufficient space provided to accommodate the types of statement precedent images shown.
- Pipeline boundary: 5m is insufficient landscape setback given the necessary screening required of the rail corridor and potential east west recreational trail corridor
- Trees, canopy and cooling:
 - Provide soil / fill amelioration strategy and plan for the Hub precinct to enable healthy and maintainable planting areas
 - Provide a tree planting and vegetation strategy and plan for the Hub precinct with technical details including drainage, planting medium, plant establishment, aeration, species etc.
 - Provide a water use strategy and supporting WSUD treatments are to be integrated with the engineering design
 - Given the extreme degree of cut and fill across the site, measures are required to ensure sustained tree / vegetation health and growth (capacity to achieve their natural height and form at maturity and be healthy) - includes underground / under pavement engineered planting vaults, use of Stratavault or similar. Designed with drainage solutions
 - Plant schedule B is not supported for secondary streets. Larger trees are required to suit the scale of development. Some species are inappropriate
 - Street trees and parkland species in Plant schedule A are not supported
- Setbacks:
 - 6m wide fire trails shall abut the built form to maximise planting in the remainder of the (20m) setback. Planting between road and building is typically unsuccessful and maximum tree heights cannot be achieved
 - 4m wide landscaping is inadequate as a frontage to the development (office and carpark landscape). Minimum 7m to be provided including mounding for screening of parking (refer DCP)
 - Minimum 2.5m side boundary setback to roads, infrastructure, pavement and parking areas (total 5m width across both lots) for canopy tree planting (while also giving consideration for any retaining wall and

infrastructure location) providing cooling of pavement areas and reduced visual bulk and scale

- Reference is made to representing Altis Property Partners and Frasers Property 'branding' – this has not been explained or presented. Details to be provided to ensure the branding is suitably scaled and visually in keeping with the native landscape character of the site.
- Comfortable and amenable well-designed outdoor spaces are to be provided for workers to socialise and recreate.
- Provide detailed landscape cross sections to demonstrate treatments of changes in level, boundaries, screening, streets including levels and dimensions, drainage and below ground interventions
- Landscape principles (Habit8) do not correlate with the level of detail shown in the remainder of documentation. Demonstrate how principles have been realised.
- Verge widths are inadequate to enable street trees of a suitably large scale to grow – species indicate large trees that are supported to reduce bulk and scale of built forms. 1.2m path widths and soft areas for planting are both too narrow. Best practice conditions and spaces are required for street trees. The current verge will sustain only small trees.
- Arborist report is required and must include the exact quantity of trees proposed to be removed.
- Green walls and climbers on walls and landscaping in general as shown on architectural perspectives are not supported and is interpreted as token greening of the building without thoughtful landscape design input. Replace with canopy trees. Unlikely to be maintained to achieve desired outcome by industrial development tenants
- Landscape design documentation has insufficient detail. Provide cross sections to demonstrate street tree planting (see notes above) and changes in level treatments and materials. Insufficient tree planting in carpark areas. Refer Council's DCP for submission requirements

Social Planning

The Social Planning team have reviewed the documents on exhibition as part of the Environmental Impact Statement for SSD 9522 titled SSD 9522 Kemps Creek Warehouse, Logistics and Industrial Facilities Hub located at 657-769 Mamre Road Kemps Creek.

The proposal is for staged development of the site for use as a warehouse, logistics and industrial facilities hub. Operational use for warehousing, distribution and industrial purposes on a 24-hour, 7-day basis is proposed. The site is located 8km from the Western Sydney Airport site. The application includes roadworks and a 33-lot Torrens title subdivision.

The proposed development would increase opportunities for local employment and encourage economic activity related to the Western Sydney Airport.

Access to and use of infrastructure, services, and facilities

The Social Impact Assessment's proposed mitigation measures include "Recognise the limited social infrastructure in the area for future workers and plan to deliver social infrastructure as part of the ongoing development of the site." Proposed provision of social infrastructure comprises provision of street pathways, along with rejuvenation and dedication of creek corridor lots of around 11ha.

Regarding the creek corridor, the EIS notes "Both small-format retail offerings and recreational facilities, may be operated in the future, in this area such as coffee shops and sandwich bars, primarily as an amenity offering to workers and the public. The area reserved around the creek's edge supports a range of active land uses, including bike paths, walking tracks, and outdoor recreation in line with the new landuse intentions for the Creek."

Based on the information provided, it is proposed that the creek corridor is "heavily rejuvenated from its current poor condition and revitalised to encourage waterfront activities" and dedicated, but no recreational embellishment is proposed as part of the development. As the proposal contains no residential component, no development contributions will be provided to Council for open space improvements. Council has limited resources to fund recreational improvements to the creek corridor. Given the SIA's recognition of the need to provide social infrastructure for future workers, provision of some recreational embellishment of the creek corridor is encouraged however this social infrastructure should also be provided throughout the site given its scale and there is currently no recreational embellishment in stage 1. Whilst use of active transport is encouraged, successful open space provision will also require provision of car parking. The EIS notes that "all future development within close proximity the creek, would have a direct interface with the natural environment of the creek and its amenity offerings." To achieve a positive interface with the creek and public open space, early concept planning of the creek corridor, ancillary facilities like car parking, adjacent retail uses and road connections is encouraged, in collaboration with Council.

The proposal is for staged development, with the creek corridor lots falling within the final stage. This staging has the potential to cause delays in the dedication of the creek corridor lots and in providing street/path connections to them. The provision of social infrastructure is an essential component of the proposal, and a clear timeframe around the provision of social infrastructure should be provided. The EIS addresses "details of how access to the Warragamba Pipelines corridor would be maintained, in consultation with WaterNSW". The Warragamba Pipeline Open Space Corridor is identified as a Green Grid Priority Project. As the proposal is located at the critical intersection of this pipeline corridor with the South Creek corridor, consideration should be given to ensure appropriate access and interface is afforded to support the success of both corridor projects.

Health and wellbeing

The Urban Heat Island effect experienced locally has social impacts related to health and wellbeing, including reduced physical activity, increased acute health conditions and mortality, increased social isolation and energy poverty for disadvantaged cohorts. Due to the large area of external building surfaces and hard surfaces for vehicles, the proposal has the potential to increase the local



Urban Heat Island effect. The proposal should be designed to contribute positively to local environmental conditions to help minimise the Urban Heat Island effect.

For this reason, the proposal's design should incorporate Council's Cooling the City Strategy principles, including solar reflectance, water permeability of hard surfaces and green infrastructure.

City Planning

- The SSD details the application of State Environmental Planning Policy (Western Sydney Employment Area) 2009 and the mechanism under which the applications is made. No comment is provided on this aspect.
- The Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan (LUIIP) – Stage 1: Initial Precincts applies to this subject land. The LUIIP identifies the following for the subject land:
 - Part of the land is identified as being within the South Creek Precinct. The South Creek Precinct is identified as one of the initial precincts to be the focus for planning and rezoning. The future directions for the South Creek Precinct is as the central green spine of the Aerotropolis, although the LUIIP does not describe specific land uses that will be permitted in this precinct.
 - The remainder of the subject land is identified as being within the Mamre Road Precinct. The Mamre Road Precinct is not one of the initial precincts and no timeframe is provided in the LUIIP to describe when further planning and rezoning is expected to occur. The LUIIP describes the principles for planning of the Mamre Road Precinct as:
 - being affected by aircraft noise and not suitable for noise sensitive land uses
 - connected to the Western Sydney Employment Area (WSEA) and the potential Western Sydney Freight Line
 - be planned for uses such as a warehousing and logistics precinct, forming an extension of the WSEA
 - could present potential opportunities for an intermodal terminal serviced by the planned Western Sydney Freight Line.
 - Council is aware that the NSW Department of Planning, Industry and Environment are reviewing the boundary of the Mamre Road Precinct from the LUIIP. Council has no further information on the timing and expected outcomes from these investigations.
- In response to these matters, it is recommended that:
 - Further information be sought on the DP&E position on this proposal including:
 - In the context of the investigations into reviewing the boundary of the Mamre Road Precinct



- Advice on the South Creek Precinct and future development outcomes
- In the context of proposed transport corridors including the Western Sydney Freight Line and Southern Link Road, prior to indicating any support/not support for this application.

Conclusion

Thank you for the opportunity to provide comment on the proposed development.

Based on the above considerations provided in this correspondence, it is considered that the current proposal should not seek approval beyond the identified Stage 1 works. It is also considered appropriate that this stage needs to be amended to better respond to the site's constraints and opportunities. The proposal will provide for numerous planning, traffic, engineering, biodiversity, environmental, landscaping, waterways, social planning and city planning concerns which do not allow the proposal to be considered acceptable in its current form.

It would be appreciated if the Department of Planning and Environment continue to liaise with Penrith City Council in response to the matters raised with appropriate officers happy to make themselves available for further discussions or additional clarification on issues.

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 8606.

Yours sincerely,

Paul Anzellotti
Acting Development Assessment Coordinator