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## **Sydney Regional Environmental Plan 30 St Marys – Amendment No. 3**

### **Response to Submissions**



**Prepared for St Marys Land Limited and Lend Lease Development Pty Ltd**

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## Contents

<b>1. Introduction</b> .....	<b>4</b>
1.1 Proposed Amendment.....	5
1.2 Public Exhibition.....	5
<b>2. Response to submissions</b> .....	<b>6</b>
2.1 DP&E Issues.....	6
2.2 Issues raised in submissions.....	6
2.3 Loss of Employment lands.....	7
2.4 Flooding and evacuation.....	8
2.5 Traffic.....	9
2.6 Further development.....	10
<b>3. Additional Amendments</b> .....	<b>10</b>
<b>4. Conclusion</b> .....	<b>12</b>

## Tables

Table 1: Summary of proposed SREP amendments.....	5
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## Appendices

- Appendix 1: Assessment against finalised GSC Plans
- Appendix 2: Response to issues raised during public exhibition
- Appendix 3: Amended SREP maps
- Appendix 4: Additional evacuation assessment, Molino Stewart
- Appendix 5: Response to PCC issues on stormwater, Cardno
- Appendix 6: Response to PCC issues on traffic, WSP

## 1. Introduction

The St Marys Development Site (the site) is located approximately 45 km west of the Sydney CBD, 5 km north-east of the Penrith City Centre and 12 km west of the Blacktown City Centre. The northern extent of the Western Sydney Employment Area (WSEA) is located approximately 4 km south west of the site.

The site has an area of approximately 1,545 hectares (ha) and is located within the Penrith and Blacktown local government areas (LGAs).

The site includes a number of development areas / precincts identified under SREP 30, including the Eastern, Ropes Creek, North and South Dunheved, Western and Central Precincts. The site also includes an area of 900 ha zoned Regional Park.

*Sydney Region Environmental Plan No. 30 – St Marys (SREP 30)* is the main environmental planning instrument applying to the site. SREP 30 is a deemed *State Environmental Planning Agreement (SEPP)* in accordance with clause 120 of Schedule 6 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*.

The Department of Planning and Environment (DP&E) publicly exhibited a draft amendment (Amendment No. 3) to SREP 30 between 4 April to 11 May 2018.

The exhibited draft amendment included:

- Rezoning of approximately 38.4 ha of land within the Central Precinct from Employment to Urban
- Revising the size and location of Drainage zones to reflect amended urban development boundaries and the progression of the stormwater management strategy for the site
- Rezoning approximately 1.2 ha of land within the Western Precinct from Urban to Regional Park

This report provides a summary of the submissions received during the public exhibition period for the proposed amendment and provides a detailed response to the key issues raised in submissions. It also outlines a proposed additional amendment to rezone a further area of land within the Western Precinct from Urban to Regional Park.

## 1.1 Proposed Amendment

In November 2017, KEYLAN Consulting Pty Ltd, on behalf of St Marys Land Limited and Lend Lease Development Pty Ltd (the Applicant) submitted a Planning Report to DP&E in support of the proposed amendment to SREP 30.

The proposed amendment is described in the table below:

Proposed SREP 30 Amendments	
<b>Central Precinct Rezoning</b>	<ul style="list-style-type: none"> <li>• Rezone approximately 38.4 ha of land in the northern part of the Central Precinct from Employment to Urban (consistent with its original zoning when SREP 30 was gazetted in 2001)</li> <li>• The rezoning will result in approximately 500 additional lots in the Central Precinct</li> <li>• The rezoned land will provide for a wide range of lot sizes, frontages and dimensions in accordance with the typologies established by the Central Precinct Plan and DCS</li> </ul>
<b>Amend size and location of Drainage zones</b>	<p>Revise the size and location of Drainage zones to reflect on-going refinements to water quality modelling following to changes to Precinct boundaries through previous SREP amendments. These revisions include:</p> <ul style="list-style-type: none"> <li>• <b>Basin B:</b> reduce in size from 8 ha to approximately 3.03 ha and partially rezone from Drainage to Regional Park</li> <li>• <b>Basin I:</b> increase in size from 7.4 ha to approximately 9.72 ha and rezone areas from Regional Park to Drainage</li> <li>• <b>Basins C2, C and V6:</b> <ul style="list-style-type: none"> <li>○ delete Basin C2 (4.5 ha) and rezone from Drainage to Regional Park</li> <li>○ create new Basin C (approximately 3.8 ha) and rezone from Regional Park to Drainage</li> <li>○ create new Basin V6 (approximately 0.7 ha) and rezone from Regional Park to Drainage</li> <li>○ overall reduction of 2.65 ha of Drainage and corresponding increase in the size of Regional Park</li> </ul> </li> </ul> <p>(Note: Basin sizes have been further refined. See Section 3.)</p>
<b>Rezone part of Western Precinct from Urban to Regional Park</b>	<ul style="list-style-type: none"> <li>• Rezone area of approximately 1.2 ha from Urban to Regional Park</li> <li>• Rezoning will facilitate transfer of this area to Office of Environment and Heritage for inclusion in the Regional Park</li> </ul>

Table 1: Summary of proposed SREP amendments

## 1.2 Public Exhibition

DP&E publicly exhibited the proposed amendment from 4 April to 11 May 2018.

A total of 33 submissions were received in response to the public exhibition. Nine submissions were from Government agencies, 1 submission from Penrith City Council (PCC), 1 from a community group and 22 from private individuals.

Chapter 2 and Appendix 2 summarise each submission received and a response to key issues raised.

## 2. Response to submissions

### 2.1 DP&E Issues

In March 2018, the Greater Sydney Commission (GSC) released *the Greater Sydney Region Plan: A Metropolis of Three Cities* and supporting District Plans. The relevant District Plan for the proposed amendment is the *Western City District Plan*.

As these plans were not released at the time the Planning Report for the proposed amendment was submitted to DP&E, the Planning Report addressed the relevant strategic plans that were applicable at the time - *A Plan for Growing Sydney* and the *Draft Western District Plan*).

Consequently, following commencement of the public exhibition period for the proposed amendment, DP&E requested that the Applicant provide a revised assessment of the proposal against the *Greater Sydney Region Plan* and the *Western City District Plan*.

This assessment is included at Appendix 1. It demonstrates that the GSC has adopted similar priorities in the finalised plans as proposed in the draft plans. Accordingly, the assessment of priorities adopted in the draft plans has not changed from the assessment provided in the planning report.

### 2.2 Issues raised in submissions

The key issues raised in submissions were:

- Loss of Employment Lands
- Flooding and evacuation
- Traffic
- Development type and density
- Biodiversity

These issues are addressed in detail in the table at Appendix 2 and a summary of the response to these issues outlined below.

## 2.3 Loss of Employment lands

Several submissions state that the loss of Employment lands will result in a loss of employment opportunities for residents of the St Marys Development Site and other impacts such as traffic and pollution.

As outlined in the Planning Report, the proposed amendment has been thoroughly considered against the provisions of the SREP 30, *St Marys Employment Development Strategy* (EDS) and St Marys State Development Agreement (SDA). The rezoning returns the northern part of the Central Precinct from Employment to Urban land, which is consistent with its original zoning when SREP 30 was gazetted in 2001.

At the request of DP&E, a St Marys EDS Review was undertaken in support of the proposed amendment to rezone the Central Precinct Employment lands. The EDS Review was prepared by SGS and provides an updated assessment of the EDS and a detailed justification for the proposed rezoning. The EDS Review concluded that the Central Precinct Employment lands are at a major competitive disadvantage when compared to existing (and proposed expanded) centres due to factors such as its isolation and limited labour catchment. The EDS Review provides a comprehensive, strategic review of the status of the Central Precinct Employment zone, consistent with the strategic review of industrial lands for local environmental plans contemplated in the Western City District Plan.

The EDS Review also comprehensively analysed the proposed rezoning in the context of the SREP 30 job ratio target (on-site jobs to resident workers) of 1:1. It found that although the job to resident ratio of 1:1 is no longer appropriate and that a job ratio of 0.4:1 would more appropriately apply to the St Marys Development site, the rezoning of the Central Precinct Employment land would maintain the current ratio in the order of 1:1 (note: it is not proposed to vary this ratio through the proposed amendment).

It is considered a poor land use outcome to maintain the Employment zoning of the site when it is demonstrably unfeasible for large-scale employment related purposes and when other land uses could be pursued in accordance with contemporary strategic planning objectives – specifically, housing supply and affordability. More suitably located employment lands are available on the St Marys Development site in the North and South Dunheved Precincts. The two precincts are targeted for completion by 2021.

It is further noted that the proposed Urban zoning still permits a range of employment generating land uses, such as child care facilities, clubs, community facilities, educational establishments, home activities, home businesses, hospitals, hotels, retail and commercial premises, medical centres, professional consulting rooms, public buildings, recreation establishments, recreation facilities, and shops.

In addition, the Applicant is proposing to contribute a further \$1,580,000 on a number of additional job creation initiatives to be implemented through the EDS. These initiatives will supplement investment in job creation initiatives to date align with PCC's strategic employment initiatives.

It is therefore concluded that there are sound land use and economic justifications for the rezoning of the Central Precinct Employment zone.

## 2.4 Flooding and evacuation

Several submissions, including the State Emergency Service (SES), Infrastructure NSW (INSW) and PCC, raised concerns that the additional residential development result from the Central Precinct rezoning would increase evacuation risks during flooding.

The Planning Report included detailed flooding and evacuation report, prepared by Molino Stewart. This report considered the impact of additional dwellings on flood evacuation and demonstrated that residents will be able to safely and efficiently evacuate the Central Precinct for flood events exceeding the 1% Annual Exceedance Probability.

Following the submission of the Planning Report, DP&E requested the Applicant to provide additional information on flood evacuation, including nominating potential buildings and facilities that could be used as temporary shelters by evacuees who are queuing in their vehicles whilst waiting for their opportunity to evacuate further via The Northern Road.

In response, Molino Stewart prepared an additional report (Appendix 4), submitted to DP&E, which provided:

- An assessment of scale of the evacuation, in terms of the number of vehicles and evacuees that, in the worst-case scenario, would be queueing in each road identified in the assessment dated 3 November 2017;
- An assessment of the evacuation time, which is determined by the time required for The Northern Road to clear all vehicles evacuating from North Penrith, Penrith, Jamisontown and Londonderry, as well as traffic from Richmond, Windsor and Bligh Park.
- An inventory of all buildings and facilities located in the proximity of the proposed evacuation routes which could be used as temporary shelters, assembly areas, or evacuation centres. The inventory includes information on the building use (i.e. land use), floor area and car park availability;

It is important to note, however, that the reliance of commercial facilities as evacuation centres is not proposed as part of the evacuation strategy and was included only in response to the DP&E request.

In response to issues raised in submissions, an additional Evacuation Analysis was prepared by Molino Stewart (Appendix 4). It provides a more detailed analysis to better describe the conservative approach in the flood evacuation analysis undertaken for the Planning Report, the range of possible evacuation outcomes and the likelihood of those outcomes.

This additional analysis notes that the proposed rezoning of the Central Precinct Employment zone could result in approximately 2,000 dwellings across the whole of Jordan Springs East, with 1,492 dwellings below the PMF. This would result in a maximum of 2,667 vehicles evacuating, which represents the worst case scenario in terms of queuing times and the number of vehicles queuing.

The additional analysis makes a number of key conclusions, including:

- The maximum queuing time for evacuees from Jordan Springs East (Central Precinct) would be 7 hours and, for those in the higher parts of the development, they are unlikely to have to queue at all. This compares to the 15 hours or so that existing evacuation traffic from Richmond, Londonderry, Windsor or Bligh Park might have to queue while they wait for each other to use The Northern Road.
- Jordan Springs East is more than 10 times less likely to have to queue than these areas to the north. There is about a 1 in 500 chance per year that any evacuation of Jordan Springs East will be necessary at all and less than a 1 in 70,000 chance per year that the 1,492 dwellings below the PMF would have to be evacuated.



- Jordan Springs East does not have to start evacuating until close to when evacuation routes to the north are cut by flooding. Accordingly, queuing times in Jordan Springs East are not particularly sensitive to the number of vehicles evacuating from these other areas, the rate of rise of floodwaters nor the available warning time.

On the basis of the above, the proposed amendment will not create any adverse flooding and evacuation impacts within the St Marys Development site and is consistent with the relevant performance objective (clause 28(7)) of SREP 30 that *development is to be carried out in a manner that minimizes flood risk to both people and property.*

The SES also raised concern with the proposed use of a road through the Regional Park between the Central Precinct and Wianamatta Parkway as an egress route. Lendlease has been consulting National Parks and Wildlife Services on the use of this road for emergency evacuation since the preparation of the Central Precinct bulk earthworks Environmental Impact Statement (EIS) in 2014. Lendlease commits to undertaking appropriate upgrades to this road to ensure it is suitable for use as an emergency evacuation route. Accordingly, the proposed amendment is consistent with clause 49(5) of SREP 30 which states that *road systems on land which would be affected by the PMF are to be designed to facilitate safe evacuation during flood events.*

## 2.5 Traffic

Several submissions raise concern about traffic congestion, the road network and access as a result of the proposed rezoning.

An Internal Road and Intersection Assessment (the Traffic Report) was prepared by WSP, which assesses the impact of the proposed rezoning of Employment to Urban land on the road network. The Traffic Report concluded that the rezoning would generate 102 less trips in the weekday AM peak and 3 more trips in the weekday PM peak and that all major intersections would continue to perform at acceptable levels.

As outlined in section 6.1.4 of the Planning Report, the Applicant will undertake a number of works over the coming years to offset the impacts on the road network associated with the St Marys Development Site, in accordance with St Marys Development Agreement and Penrith Planning Agreement. This includes the proposed extension of Links Road to Christie Street, which will provide access from the industrial precinct to Christie Street with connections to both Dunheved Road and Werrington Road.

Penrith City Council's submission raised concern regarding the internal road and intersection assessment supporting the Planning Report. Additional traffic and transport advice has been prepared by WSP in response to Council's concerns and is provided at Appendix 6.

It is therefore concluded that the draft amendment will not create any adverse traffic impacts both within the St Marys Development site and the external road network.

## 2.6 Further development

Several submissions expressed concerns over further residential development on the St Marys Development site. Specific concerns included overdevelopment, additional traffic (addressed above) and ecological impacts.

The proposed rezoning of the Central Precinct Employment zone to Urban would provide for approximately 500 new dwellings. It relates to land already zoned for urban development purposes and *does not result in the rezoning of any additional land for development purposes*. Furthermore, the draft amendment would result in a 3.2 ha increase in the area of the Regional Park through the reconfiguration of the Drainage zones and the transfer and rezoning of land zoned for Urban purposes to the Regional Park. In addition, it is now proposed to add a further area of land zoned Urban in the Western Precinct (Jordan Springs) to the Regional Park (see Section 3).

The Ecological Constraints Analysis (ECA) prepared in support of the proposed amendment confirmed that the area of land within the Central Precinct proposed for rezoning has been fully assessed under the Central Precinct Species Impact Statement (SIS) and that no significant impacts are anticipated. Furthermore, the Commonwealth Department of Environment and Energy has confirmed that the proposed amendment does not require further assessment or approval under the *Environmental Protection and Biodiversity Conservation Act 1999*.

The Planning Report also included a Central Precinct Community Plan Update, which outlined the additional community facilities and services required to support the rezoning, including:

- Funding for additional community facility floorspace
- Contributions towards library and cultural facilities
- Open space improvements
- Additional resident information packages for new households
- Additional time for the community development worker to be employed

These contributions will be negotiated as part of a future amendment of the Penrith Planning Agreement, should the amendment be made.

On the basis of the above, the proposed amendment would not result in an overdevelopment of the St Marys Development or lead to unacceptable social or environmental impacts.

## 3. Additional Amendments

Since the exhibition of the proposed amendment, the Applicant has, in consultation with Office of Environment and Heritage and PCC, identified a further area of land zoned Urban as suitable for transfer to the Regional Park in order to enhance a north-south biodiversity corridor on the site.

The relevant land has an area of approximately 8,675 m<sup>2</sup> and is within the northern part of the Western Precinct, to the immediate north of an existing road that adjoins the existing Regional Park zone (Figure 1).

This requires a further amendment to the SREP 30 Zoning Map to rezone this land from Urban to Regional Park. Amended SREP 30 maps are provided at Appendix 3.

The proposed Drainage zone boundaries have also been refined and amended. In particular, the boundaries for proposed basins V6 and C have been amended to provide additional flexibility for the future detailed design of each basin. This will enable the zones to accommodate potential further design refinements through future development applications. Conversely, additional land could be potentially rezoned to Regional Park under a separate rezoning process once the basin designs have been finalised.

In summary, the current proposed SREP Amendment results in an overall increase of 3.2 ha of Regional Park, comprising:

- 1.2 ha from the improvement to the efficiency and maintenance impact of the drainage basins
- 2 ha from the rezoning of Farm Dam Park and the northern part of the Western Precinct.

Whilst this is a marginal reduction of 0.65 ha of Regional Park to what was proposed in the Planning Report, it still provides for a substantial net increase in the size of the Regional Park.

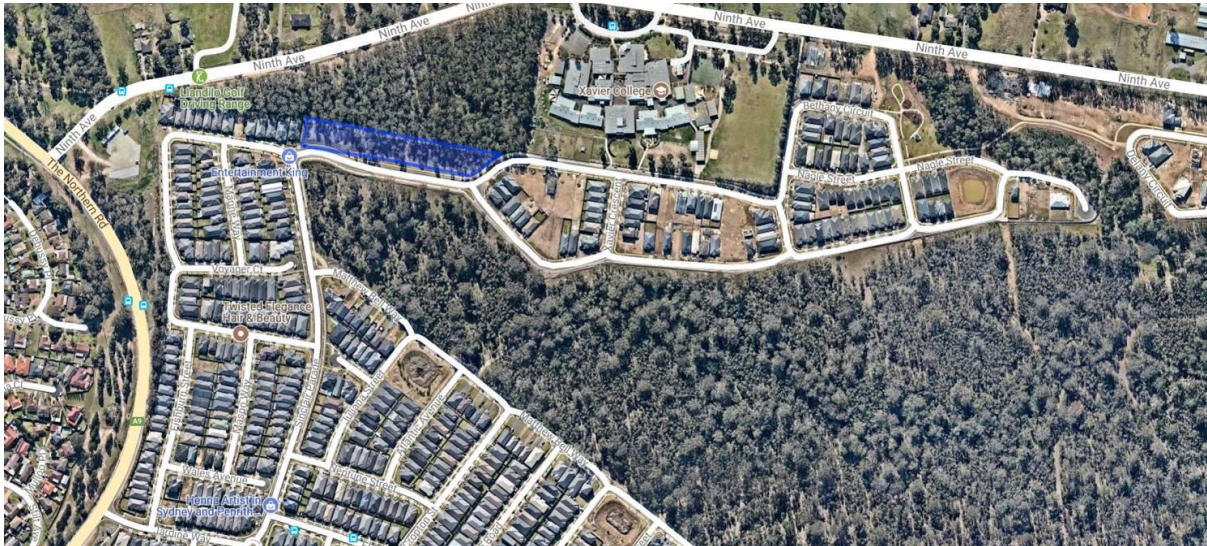


Figure 1 Area proposed for rezoning from Urban to Regional Park

## 4. Conclusion

This report addresses the matters raised in the submissions received during the exhibition period of 4 April – 11 May 2018 for the proposed amendment to SREP 30. It includes a detailed analysis of and response to all issues raised in submissions and is supported by additional technical information relating to emergency evacuation, traffic and stormwater.

It also describes an additional proposed amendment to rezone additional land in the Western Precinct (now known as Jordan Springs) from Urban to Regional Park to facilitate the establishment of a biodiversity corridor on the St Marys Development site. This will contribute to additional land being added to the Wianamatta Regional Park.

This report confirms the conclusion of the Planning Report that, given the positive planning merits of the Amendment and its benefits, the making of the amendment to SREP 30 is warranted.

## **Appendix 1**

### **Assessment against finalised GSC Plans prepared by Keylan Consulting Pty Ltd**

## Appendix 1

# Sydney Region Environmental Plan 30 St Marys – Amendment No. 3 – Assessment against finalised GSC Plans

## 1. Introduction

The following advice has been prepared by KEYLAN Consulting Pty Ltd (KEYLAN) for St Marys Land Limited and Lend Lease Development Pty Limited (the Client) for submission to the Department of Planning and Environment (DP&E).

The SREP 30 Amendment No. 3 Planning Report was lodged with DP&E in November 2017. At the time the planning report was lodged, the *Greater Sydney Region Plan* and District Plans had not been finalised. Accordingly, the planning report reviewed the draft amendment against the Draft Plans.

The Greater Sydney Commission (GSC) finalised both the *Greater Sydney Region Plan* (Region Plan) and the District Plans on 18 March 2018. **It is important to note that the GSC has adopted similar priorities in the finalised plans as proposed in the draft plans.**

This document provides a supplementary review of the draft amendment against the finalised plans. The assessment of priorities adopted in the draft plans has not changed from the assessment provided in the planning report.

### 1.1 Greater Sydney Region Plan

The *Greater Sydney Region Plan* outlines how growth in the Greater Sydney Region will be managed and change in the context of social, economic and environmental matters. It sets the vision and strategy for Greater Sydney, to be implemented at a local level through District Plans. The Region Plan replaces *A Plan for Growing Sydney* as the leading region plan for Greater Sydney.

The overriding vision for Greater Sydney is to rebalance Sydney into a metropolis of three unique but connected cities; an Eastern Harbour City, the Western Parkland City and the Central River City with Greater Parramatta at its heart.

Historically, Greater Sydney's jobs and transport have been focused to the east, requiring many people to make long journeys to and from work and other services. The 3 cities vision allows opportunities and resources to be shared more equitably while enhancing the local character we value in our communities.

By integrating land use, transport links and infrastructure across the three cities, more people will have access within 30 minutes to jobs, schools, hospitals and services.

The Region Plan provides broad *Priorities and Actions* which focus on the following 4 key themes:

- *Infrastructure and collaboration*
- *Liveability*
- *Productivity*
- *Sustainability*

The housing targets identified for the Western City District in the Region Plan are the same housing targets identified in the Draft Region Plan:

- 2016-2021: 39,850
- 2016-2036: 184,500

The draft Amendment is consistent with the objectives of the Region Plan as it:

- Will contribute to the housing supply and affordability targets and objects of the Region Plan by providing for additional housing stock and choice in an area already being developed as a mixed-use, master planned community supported by local and state infrastructure.
- Will be consistent with Objective 10 *Greater housing supply*, Objective 11 *Housing is more diverse and affordable* and Objective 12 *Great places that bring people together*.
- Ensures the best land use outcome for an area that is not suitable or viable for large scale employment development, without impacting on the key strategic growth areas identified in the Draft Plan.
  - Objective 23 *Industrial and urban services land is planned, retained and managed* identifies the approaches to planning for industrial and urban services land in existing and planned urban areas.
  - The site has been identified as industrial and urban services land to be retained and managed within the Region Plan.
  - The retain and manage approach identifies land which should be safeguarded from residential and mixed-use zones.
  - Objective 23 acknowledges that *there will be a need, from time to time, to review the list of appropriate activities within any precinct in consideration of evolving business practices and how they can be supported through permitted uses in local environmental plans. Any review should take into consideration findings of industrial, commercial and centre strategies for the local government area and/or the district. Any review should take into consideration findings of industrial, commercial and centre strategies for the local government area and/or the district.*
  - Whilst the SREP 30 Amendment seeks to rezone existing (undeveloped) Employment land, the rezoning of this land is supported by the St Marys Employment Development Strategy Review, which provides a comprehensive, strategic review of the Central Precinct Employment zone. This review concludes that the land is significantly disadvantaged for employment uses due to its:
    - Location outside of larger, strategically significant employment areas identified in the Region and District Plan;
    - Isolation from major freight carrying roads; and
    - Uncompetitiveness compared to other nearby employment lands.
  - The review undertaken for the draft Amendment is in line with the review process outlined in the Region Plan.
  - In addition, the Applicant has supported job creation within the St Marys Development via the Skilling and Employment Centre (SEC) in the St Marys town centre, which has facilitated the provision of 5,000 jobs. The SEC has also facilitated, through direct funding and partnership, skill development and training for 1,900 people. The Applicant is also proposing a range of additional employment initiatives through the EDS to create an additional 1,165 jobs.

- Will reduce the environmental pressure on sensitive Cumberland Plain Woodland and freshwater wetlands by removing the development potential of these areas and protecting the biodiversity on the site. It will add an additional 3.2 ha of land to the Wianamatta Regional Park, therefore facilitating achievement of improved biodiversity conservation outcomes.
- Will be consistent with Objective 27 *Biodiversity is protected, urban bushland and remnant vegetation is enhanced*, Objective 28 *Scenic and cultural landscapes are protected*, and Objective 31 *Public open space is accessible, protected and enhanced*.

## 1.2 Western City District Plan

The Western City District Plan manages growth in the context of economic, social and environmental matters in the Western City. It provides the district level framework to implement the goals and directions outlined in the *Greater Sydney Region Plan* for the Western City District.

There are a number of planning priorities in the Western City District Plan that are of particular relevance to the draft Amendment, as outlined below:

Relevant Planning Priority	Comment
<b>Planning priority W5</b> Providing housing supply, choice and affordability with access to jobs, service and public transport.	No change to the assessment against Planning Priority W5 in the Draft Plan, i.e.: <ul style="list-style-type: none"> <li>• <i>...the rezoning will provide for approximately 500 new residential lots and contribute to the Penrith LGA target of 6,600 new dwellings between 2016-21.</i></li> <li>• <i>The additional residential lots would contribute to addressing the current undersupply of housing and the need for housing that is more affordable.</i></li> <li>• <i>The new residential lots would provide for a range of housing sizes and types in accordance with the Central Precinct Plan and DCS and would therefore foster housing diversity.</i></li> <li>• <i>The proposed SREP amendments would contribute to addressing housing affordability through significant additional housing supply and choice in an area already identified for housing development and which is supported by State and local infrastructure contributions.</i></li> <li>• <i>The State Planning Agreement includes a provision requiring the provision of 120 residential allotments across the site for the purposes of providing affordable housing.</i></li> </ul>
<b>Planning Priority W6</b> Creating and renewing great places and local centres, and respecting the District's heritage	No change to the assessment against Planning Priority W6 in the Draft Plan, i.e.: <ul style="list-style-type: none"> <li>• <i>... the existing Employment lands in the Central Precinct are uncompetitive when compared to other identified strategic centres and are likely to remain vacant. They are not identified as a key strategic economic or employment area in the District Plan.</i></li> <li>• <i>The rezoning of Employment lands to Urban land will improve the liveability of the surrounding residential neighbourhood. It will also allow for the best urban design outcome, creating a vibrant suburb, that is well connected to the village centre and the surrounding natural environment.</i></li> </ul>
<b>Planning Priority W10</b> Maximising freight and logistics opportunities and planning and managing industrial and urban services lands	No change to the assessment against Planning Priority W10, i.e.: <ul style="list-style-type: none"> <li>• <i>The Plan notes the main industrial and urban services areas in the District as Western Sydney Employment Area, the Liverpool to Campbelltown corridor and the Fairfield to Eastern Creek corridor. Further land is proposed to be rezoned for industrial and urban services in Western Sydney Employment Area, Erskine Park, Western Sydney Airport Priority Growth Area,</i></li> </ul>



Relevant Planning Priority	Comment
	<p><i>Elizabeth Drive Enterprise, South West Priority Growth Area and Greater Macarthur Priority Growth Area.</i></p> <ul style="list-style-type: none"> <li>• <i>Whilst the Plan acknowledges the changing nature of industrial land in the District it notes that protecting industrial and urban services land can facilitate industries of the future, including creative industries and environmental services such as waste management and recycling facilities.</i></li> <li>• <i>Whilst this SREP 30 Amendment seeks to rezone existing (undeveloped) Employment land...the rezoning of this land is supported by the EDS Review and is acceptable as the land is significantly disadvantaged for employment uses due to its:</i> <ul style="list-style-type: none"> <li>○ <i>location outside of larger, strategically significant employment areas identified in the Draft Sydney Region and Draft District Plan;</i></li> <li>○ <i>isolation from major freight carrying roads; and</i></li> <li>○ <i>uncompetitiveness compared to other nearby employment lands.</i></li> </ul> </li> </ul> <p>In addition to the above, it is noted that the EDS Review provides a comprehensive, strategic review of the status of the Central Precinct Employment zone, consistent with the strategic review of industrial lands for local environmental plans contemplated in the Western City District Plan.</p> <p><b>Note.</b> The Outer Sydney Orbital recommended corridor – public consultation was undertaken from March 2018 – 1 June 2018. The Orbital Corridor runs through the St Marys Development Site, to the east of the Central Precinct.</p> <p>The Corridor is yet to be finalised and its progression is subject to relevant environmental studies, planning approvals and land acquisition. There is no certainty, at this time, that the Outer Sydney Orbital will proceed through the St Marys Development site or, if so, the timing for its completion. Given this level of uncertainty, it is considered unreasonable for the proposed rezoning of the Central Precinct for much needed additional housing supply and other permissible development in the Urban zone, to not proceed.</p> <p>Furthermore, the employment areas of the North and South Dunheved Precincts on the site are better located in terms of connectivity to the potential future Outer Sydney Orbital.</p> <ul style="list-style-type: none"> <li>• <i>In addition, the Applicant’s job creation initiatives (resulting in approximately 5,000 new jobs) will be supplemented by a range of additional employment initiatives to implemented through the EDS – equating to approximately 1,165 additional jobs.</i></li> <li>• <i>Due to the constraints of the site and its overall uncompetitive nature, as well as other key priorities relating housing supply and affordability, the rezoning to Urban land in the Central Precinct represents the best outcome for the site and the District.</i></li> </ul>
<p><b>Planning Priority W11</b>          Growing investment, business opportunities and jobs in strategic centres</p>	<p>No change to the assessment against Planning Priority W11 in the Draft Plan, i.e.:</p> <ul style="list-style-type: none"> <li>• <i>The rezoning of the site to urban land will improve the liveability of surrounding residential neighbourhood and the creation of a vibrant suburb that is well connected to Central Precinct and other nearby centres.</i></li> </ul>

Relevant Planning Priority	Comment
<b>Planning priority W14</b> Protecting and enhancing bushland and biodiversity	No change to the assessment against Planning Priority W14 in the Draft Plan, i.e.: <ul style="list-style-type: none"> <li>• The rezoning removes industrial activity from the boundary of the Regional Park thereby further safeguarding the Regional Park’s ecological value.</li> <li>• Additionally, the rezoning results in an increase of 3.2 ha of Regional Park, comprising:               <ul style="list-style-type: none"> <li>○ 1.2 ha from the improvement to the efficiency and maintenance impact of the drainage basins</li> <li>○ 1.2 ha from the rezoning of Farm Dam Park</li> <li>○ 8,675 m<sup>2</sup> ha from the rezoning of additional land in the northern part of the Western of the Precinct</li> </ul> </li> </ul>
<b>Planning Priority W16</b> Protecting and enhancing scenic and cultural landscapes	No change to the assessment against Planning Priority W16 in the Draft Plan, i.e.: <ul style="list-style-type: none"> <li>• <i>The proposed rezoning of Employment and Drainage lands will not impact on heritage items on the site.</i></li> </ul>
<b>Planning Priority W18</b> Delivering high quality open space	No change to the assessment against Planning Priority W18 in the Draft Plan, i.e.: <ul style="list-style-type: none"> <li>• The rezoning would facilitate the delivery of high quality open space, improve efficiency and maintenance of the Regional Parklands.</li> </ul> <p>The proposed rezoning would result in Lendlease contributed additional money (approx. \$2M) to the delivery on Regional Open Space, adjacent to the Central Precinct.</p>
<b>Planning Priority W20</b> Adapting to the impacts of urban and natural hazards and climate change	<p>The proposed rezoning will not result in any change to the location or amount of fill imported to the St Marys precinct or the resulting topography of the site.</p> <p>The proposed rezoning will not change the flooding dynamics and PMF assumptions and conclusions established for the overall St Marys Precinct.</p> <p>An additional Evacuation Analysis was prepared by Molino Stewart (Appendix 4) which confirms that there is about a 1 in 500 chance per year that any evacuation of Jordan Springs will be necessary at all and less than a 1 in 70,000 chance per year that it would all have to be evacuated.</p> <p>The proposed amendment will also revise the size and location of the Drainage zones to reflect on-going refinements to water quality modelling. The revised Drainage zones will better respond to the St Marys Development and improve the efficiency of the basins, ensuring future development can withstand flood events. The Drainage zones will reduce the distance of storm discharges for the precinct and therefore potential erosion impacts and improve access for maintenance.</p> <p>Flooding and Evacuation is further addressed in section 2.4 of this Report.</p>

Table 2: The Western City District Plan relevant planning priorities

## **Appendix 2**

**Response to issues raised during public exhibition  
prepared by  
Keylan Consulting Pty Ltd**

## Appendix 2

### Response to issues raised during public exhibition

Submitter ID	Issue	Response
<b>Government and Public Agency Submissions</b>		
<b>Department of Education</b> (submission dated 10/5/18)	<ul style="list-style-type: none"> <li>The Department is currently in the process of purchasing a site owned by Lendlease in Jordan Springs for the purchase of a school.</li> <li>The Central Precinct Community Plan Update Rezoning Report (Elton Consulting) was prepared last year and statements provided regarding impacts from the development and Lendlease dedicating the school site to the department are no longer relevant or accurate to the current proposal.</li> <li>The additional lots proposed as part of the EIE will place further pressure on existing and future assets in the St Marys ADI precinct and surrounding schools.</li> </ul>	<ul style="list-style-type: none"> <li>The Central Precinct Community Plan Update prepared by Elton Consulting states that Lendlease proposes to provide a new primary school in Jordan Springs which is subject to agreement under the St Marys Development Agreement with Lendlease and the Minister for Planning.</li> <li>Lendlease has now exchanged on the school site and DP&amp;E have commenced planning for the construction of the school.</li> </ul>
<b>Transport for NSW</b> (submission dated 2/5/18)	<p><b>Outer Sydney Orbital</b></p> <ul style="list-style-type: none"> <li>The recommended draft corridor for the Outer Sydney Orbital (OSO) is currently under public exhibition (since 26 March 2018).</li> <li>It is noted that part of the draft corridor lies within the land applicable under SREP 30. However, the draft corridor does not lie directly on the land currently being considered for rezoning from employment to residential.</li> <li>Should the proposed changes to SREP 30 be supported by the DP&amp;E, it is important that there would be no additional costs or implications on the draft corridor and future land acquisitions.</li> </ul> <p><b>Public and active transport infrastructure</b></p> <ul style="list-style-type: none"> <li>The proposed change in land use will need to be supported by public and active transport infrastructure, such as bus stops/shelters, shared paths and bus capable roads. This will need to be detailed within the future amendment to the Central Precinct Plan. As part of this future amendment, the relevant planning authority should consult with TfNSW regarding public and active transport infrastructure.</li> </ul>	<p><b>Outer Sydney Orbital</b></p> <ul style="list-style-type: none"> <li>It is noted that the Orbital Corridor draft corridor runs through the St Marys Development Site, to the east of the Central Precinct. Accordingly, there is no direct impact from the proposed rezoning on the draft corridor, and vice versa.</li> <li>It is also noted that if the Central Precinct Employment area was not rezoned, it would still have constrained access to the Orbital as it would require an arterial road linkage through the residential areas of the precinct and possibly the Regional Park.</li> <li>The employment areas of the North and South Dunheved Precincts on the site are better located in terms of connectivity to the potential future Outer Sydney Orbital.</li> </ul>

Submitter ID	Issue	Response
		<ul style="list-style-type: none"> <li>Notwithstanding the above, the Corridor is yet to be finalised and its progression is subject to relevant environmental studies, planning approvals and land acquisition.</li> </ul> <p><b>Public and active transport infrastructure</b></p> <ul style="list-style-type: none"> <li>Noted and agreed. Future residential areas will be designed with the same level public and active transport infrastructure of established areas of Jordan Springs and will be serviced by local bus services.</li> <li>Details will be provided in the future amendment to the Central Precinct Plan.</li> </ul>
<b>Roads and Maritime Services</b> (submission dated 13/6/18)	<ul style="list-style-type: none"> <li>Supports the advice provided by TfNSW.</li> <li>RMS understands that the transport impacts associated with the rezoning from employment to residential for the Central Precinct forms part of the draft package of Transport Works (Revised Local Transport Works Offer).</li> <li>RMS, in partnership with TfNSW, will continue to work with Penrith City Council and Lendlease to finalise the revised Local Transport Works.</li> </ul>	<ul style="list-style-type: none"> <li>See response to TfNSW submission.</li> <li>Lendlease will continue to work with Council, RMS and TfNSW to finalise negotiations on the revised Local Transport Works.</li> </ul>
<b>Office of Environment and Heritage</b> (submission dated 14/5/18)	<p><b>Rezoning land within the Jordan Springs from Urban Zone to Regional Park Zone</b></p> <ul style="list-style-type: none"> <li>OEH fully supports the rezoning of approximately 1.2 ha of land from Urban to Regional Park.</li> </ul> <p><b>Relocation of drainage infrastructure</b></p> <ul style="list-style-type: none"> <li>OEH has been in negotiation with Lendlease regarding the location of the basins and is satisfied that the changes reduce impact to the future park.</li> <li>OEH has discussed that for Basin I, Basin C and Basin V6 that the designs will include access for OEH vehicles as these basins will block important management trails if these are not incorporated into the design.</li> <li>OEH seeks clarification as to whether the proposed basins are to function as wet or dry basins.</li> </ul> <p><b>Bushfire Protection Measures</b></p>	<p><b>Rezoning land within the Jordan Springs from Urban Zone to Regional Park Zone</b></p> <ul style="list-style-type: none"> <li>OEH support noted.</li> <li>As discussed and agreed with OEH, additional land in the Western Precinct is now proposed to be rezoned from Urban to Regional Park (Refer to Section 3 of report and amendment maps at Appendix 3).</li> </ul> <p><b>Relocation of drainage infrastructure</b></p> <ul style="list-style-type: none"> <li>All basins will be designed to be incorporated into the access track network and drainage infrastructure, which will allow access for OEH vehicles.</li> </ul>

Submitter ID	Issue	Response
	<ul style="list-style-type: none"> <li>• OEH recommends the following:               <ul style="list-style-type: none"> <li>○ No housing should share a direct boundary with the regional park, particularly on the north-western side, and that local streets are located between the regional park and the housing</li> <li>○ Appropriate access needs to be provided to the larger basins for fire trucks to draught water in case of a wildfire.</li> </ul> </li> </ul> <p><b>Temporary Fencing of basins</b></p> <ul style="list-style-type: none"> <li>• OEH recommends that Lendlease will need to temporarily fence the drainage basins during construction to ensure that the kangaroos and emus do not enter while they are working.</li> <li>• There also needs to be an appropriate maintenance timeframe after construction of the basins to ensure that weeds do not establish in the Regional Park.</li> </ul> <p><b>Rezoning of land from Employment Zone to Urban Zone</b></p> <ul style="list-style-type: none"> <li>• To assist mitigate the increase in park usage and potential impacts associated with this, OEH requests that Lendlease provides additional funding for the provision of dedicated and appropriate park entrances in these areas.</li> <li>• OEH recommends that if this proposed rezoning is approved, additional provisions are included in the SREP which require:               <ul style="list-style-type: none"> <li>○ A diversity of local native trees/vegetation that are endemic to the St Marys Development Site are used in the street plantings and private gardens across the whole new urban area, particularly as this area is surrounded by the Regional Park.</li> <li>○ Fauna friendly fencing to be used along the boundaries of the new residential properties to assist native fauna movement so as not to create a physical barrier to fauna movement</li> </ul> </li> </ul> <p><b>Flood</b></p> <ul style="list-style-type: none"> <li>• Council's approved flood model should be used where appropriate for flood information as the site falls within the model extent. The model should be requested from Council and utilised for the assessment.</li> </ul>	<ul style="list-style-type: none"> <li>• Basins will be constructed wetlands, with a permanent pool of water in their middle - approximately 2m deep.</li> <li>• Basin design will be subject to future DAs. In this regard, it is noted that Secretary's Environmental Assessment Requirements (SEARs) have been issued for Basins I and B and that OEH was consulted by DP&amp;E during the preparation of the SEARs. DAs/EISs are currently being prepared for these basins. These DAs will be lodged with PCC and OEH will be further consulted at DA stage.</li> </ul> <p><b>Bushfire Protection Measures</b></p> <ul style="list-style-type: none"> <li>• Noted and agreed. Future residential areas will be designed to address bushfire protection measures, consistent with the existing residential development pattern in Jordan Springs East. A Bushfire Protection Assessment report was undertaken in support of the proposed amendment and submitted with the Planning Report.</li> <li>• See above - all basins will be designed to be incorporated into the access track network.</li> </ul> <p><b>Temporary Fencing of basins</b></p> <ul style="list-style-type: none"> <li>• Construction fencing for the basins will be addressed in relevant DAs.</li> <li>• Maintenance requirements for the basins will be addressed in relevant DAs.</li> </ul>

Submitter ID	Issue	Response
	<ul style="list-style-type: none"> <li>• If this cannot be done the differences between the proponent’s model and Council’s model results should be discussed in detail and the justification for any different model used should be presented.</li> <li>• OEH raises the following concerns:               <ul style="list-style-type: none"> <li>○ Inconsistency with Section 9.1 Direction 4.3 ‘Flood Prone Land’ of the Environmental Planning and Assessment Act 1979, particularly sub-clauses 6(a) and 6(d) of S9.1 Direction 4.3 which state: <i>A planning proposal must not contain provisions that apply to the flood planning areas which:</i> <ul style="list-style-type: none"> <li>(a) <i>permit development in floodway areas,</i></li> <li>(d) <i>are likely to result in a substantially increased requirement for government spending on flood mitigation measures, infrastructure or services,</i></li> </ul> </li> <li>○ Inappropriate proposed land use to the identified flood risk: the proposed residential development would not be appropriate to the identified flood hazard as residential land use should not be located within the high and very high hazard areas.</li> <li>○ The proposed residential development in these two precincts would increase the risk to life in the Hawkesbury Nepean Valley and should carefully be considered in the context of the increase in other residential development in the valley, and to adequately assess the cumulative impacts on flood risk and evacuation constraints.</li> <li>○ The proposal contains no measures to reduce the residual risk of all the people who will not evacuate.</li> </ul> </li> </ul> <p>Additional issues raised in email to DP&amp;E (date not known):</p> <p><b>Zoning</b></p> <ul style="list-style-type: none"> <li>• The Zoning Map may need to be updated to reflect the location of the proposed drainage basin B as this is not shown clearly on the proposed zoning map and may need to be as all the other drainage basins are shown in the correct layout and the location shown differs to the basin shown in Figure 2 of the Ecological Constraints Analysis report prepared by Cumberland Ecology.</li> </ul>	<p><b>Rezoning of land from Employment Zone to Urban Zone</b></p> <ul style="list-style-type: none"> <li>• Lendlease commits to on-going discussions with OEH regarding additional pedestrian entrances to the Regional Park, noting that the area of the Central Precinct proposed to be rezoned from Employment to Urban has limited interface with the 'active' zones in the Wiannamatta Regional Park.</li> <li>• In accordance with the Central Precinct Plan and Development Control Strategy, local native plant species will be included in the landscape design for the new areas of Urban zoned land.</li> <li>• New fencing will be of the same type, as agreed with OEH, provided for existing areas where residential areas interface with the Regional Park boundary.</li> </ul> <p><b>Flood</b></p> <ul style="list-style-type: none"> <li>• The Water, Soil and Infrastructure Report prepared by Jacobs has undertaken a flood assessment using the MIKEFLOOD hydrodynamic modelling package, which was developed with consistent assumptions to produce results consistent with Council’s RMA-2 model.</li> <li>• The justification for using the MIKEFLOOD hydrodynamic modelling package is provided in the Water, Soil and Infrastructure Report.</li> </ul>

Submitter ID	Issue	Response
	<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>Please confirm what assessment has occurred to determine that there will be no adverse impacts on Aboriginal Cultural Heritage values, particularly given the new and/or expanded drainage basins 1 that is increased in size from 7.4 Ha to 9.7 Ha and new drainage basin V6 of 0.6 Ha in size.</li> </ul>	<ul style="list-style-type: none"> <li>Additional information addressing flood evacuation is outlined in Section 2.4 of the Report and Appendix 4.</li> </ul> <p><b>Zoning</b></p> <ul style="list-style-type: none"> <li>The draft zoning map clearly shows the proposed revised boundaries of Basin B.</li> <li>The revised boundaries of Basin B are contained wholly within the existing zone boundaries of this basin.</li> <li>These boundaries correspond with Figure 2 of the Cumberland Ecology report.</li> </ul> <p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>Basin B is covered by existing AHIP C0000362.</li> <li>Basin I archaeological investigations are being undertaken as part of the Basin I EIS currently being prepared.</li> </ul>
<p><b>Department of Industry</b> (undated submission)</p>	<p><b>NSW Department of Primary Industries</b></p> <ul style="list-style-type: none"> <li>DPI Fisheries does not raise any concerns in relation to threatened species listed under the <i>Fisheries Management Act 1994</i>.</li> </ul> <p><b>Lands and Water Division (L&amp;W)</b></p> <ul style="list-style-type: none"> <li>DP&amp;E should consider the adoption of specific controls within any amended consent to identify and respond to adverse impacts on soils and water quality arising from:             <ol style="list-style-type: none"> <li>changed groundwater flow behaviour brought about by compaction of compressible residual soils following land filling,</li> <li>increased recharge beneath stormwater basins (where adequate lining has not been applied to prevent leakage to groundwater),</li> </ol> </li> </ul>	<p><b>NSW Department of Primary Industries</b></p> <ul style="list-style-type: none"> <li>Noted.</li> </ul> <p><b>Lands and Water Division</b></p> <ul style="list-style-type: none"> <li>Filling of land in the Central Precinct has already been approved by PCC through adoption of the Central Precinct Plan and approval of relevant Das.</li> <li>Issues raised relate to DA level of design detail. All issues will be addressed in relevant future DAs, in accordance with the requirements of SREP 30.</li> </ul>



Submitter ID	Issue	Response
	<p>iii. changes to planned excavation dimensions (e.g. temporary sedimentation basins for the first phase of earthworks) that have resulted in cuts extending deeper below ground level and over a larger area,</p> <p>iv. more extensive or longer duration dewatering of 'soft alluvial or poor drainage areas' resulting in water quality impacts.</p> <ul style="list-style-type: none"> <li>It is recommended that more comprehensive consultation with L&amp;W is undertaken prior to development of proposal amendments.</li> <li>An assessment of the need for licensing should consider the potential interaction with both intermittent and permanent groundwater systems present beneath the subject site, and should be carried out in consultation with the L&amp;W.</li> </ul> <p><b>Additional information/data required</b></p> <ul style="list-style-type: none"> <li>The proponents must undertake sufficient additional investigations within the site designed to address the specific matters identified to demonstrate to L&amp;W that the scale of impacts, their mitigation and management will not result in substantial changes to the groundwater and linked surface water systems.</li> <li>The proponents of the development may require licensing of dewatering activities undertaken throughout the precinct. Consultation will be required with the L&amp;W on the magnitude of take and the quality and management of the extracted groundwater to allow for appropriate regulation of the project. As any dewatering is regulated under the WM Act, it needs to be recognised in accordance with the Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011.</li> <li>The proponent will need to ensure that the lining or sealing of all basins receiving water flow (either stormwater runoff or drainage flows) is undertaken to prevent seepage to any groundwater system.</li> <li>The proponent must consult with the Department of Industry in accordance with the document 'Consultation with DPI Water for consultants and proponents of major projects' in relation to those matters identified within SREP 30. Matters to consult with the L&amp;W in particular are the water cycle management strategy, the groundwater management strategy, and precinct plans. All matters that have the potential to impact on groundwater systems and which would therefore fall under the definition of 'aquifer interference activities need to be addressed.</li> </ul>	<ul style="list-style-type: none"> <li>We understand PCC will consult with Lands and Water Division, as required, in relation to relevant DAs.</li> <li>Notwithstanding, the Planning Report included a detailed Water, Soils and Infrastructure Report which addressed issues relating to groundwater.</li> </ul> <p><b>Additional information/data required</b></p> <ul style="list-style-type: none"> <li>As above.</li> </ul> <p><b>Guidelines/policies that should be addressed</b></p> <ul style="list-style-type: none"> <li>Noted. All guidelines will be addressed in future DAs, as relevant.</li> </ul> <p><b>Gaps in the project detail</b></p> <ul style="list-style-type: none"> <li>The proposed amendments relate to rezoning only of areas already zoned for urban development purposes through the original gazettal of SREP 30 in 2001.</li> <li>As outlined above:             <ul style="list-style-type: none"> <li>the Planning Report included a detailed Water, Soils and Infrastructure Report which addressed issues relating to groundwater</li> <li>issues raised relate to DA level of design detail. All issues will be addressed in relevant future DAs, in accordance with the requirements of SREP 30, and Land and Water Division consulted by PCC as required.</li> </ul> </li> <li>Although licensing is not relevant to the rezoning stage, it is understood that the</li> </ul>

Submitter ID	Issue	Response
	<ul style="list-style-type: none"> <li>L&amp;W considers that the three monitoring bores at the site are not sufficient considering the size of the site. Monitoring of the site will need to include monitoring of discrete aquifers (e.g. alluvium and bedrock in isolation). Therefore, additional monitoring locations need to be established in consultation with L&amp;W.</li> <li>Any dewatering will require licenses and approvals issued under the WM Act. An aquifer interference activity will require licensing under Part 5 of the Water Act (1912) in lieu of the aquifer interference provisions of the WM Act.</li> </ul> <p><b>Guidelines/policies that should be addressed</b></p> <ul style="list-style-type: none"> <li>NSW Aquifer Interference Policy (2012)</li> <li>Australian Groundwater Modelling Guidelines (2012)</li> <li>Minimum Construction Requirements for Water Bores in Australia (2012)</li> <li>Department of Industry – Water’s Guidelines for Controlled Activities on Waterfront Land (2012)</li> <li>NSW Groundwater Dependent Ecosystems Policy</li> <li>NSW Groundwater Quality Protection Policy</li> <li>NSW Groundwater Quantity Management Policy</li> </ul> <p><b>Gaps in the project detail</b></p> <ul style="list-style-type: none"> <li>The predominant focus of the proposed amendment appears to be the rezoning of particular land parcels. There are matters alluded to within the documentation that are of concern to L&amp;W. These are matters that may result in adverse impacts to groundwater systems beneath and around the development precinct and thereafter consequent effects on the integrity of structures and the broader water environment.</li> <li>L&amp;W (and its predecessor agencies) has not been adequately consulted with regard to the groundwater-related issues associated with the precinct developments. As a result, L&amp;W has had no prior opportunity to provide input into the ongoing development of the former Australian Defence Industry site. Several recommendations regarding groundwater-related matters in accordance with the WM Act and the NSW Aquifer Interference Policy are therefore provided.</li> </ul>	<p>future basins will not require a license as they do not involve groundwater extraction.</p> <ul style="list-style-type: none"> <li>Additional bore monitoring will be explored as part of the detailed design for the basins through the DA process.</li> <li>It is understood that DP&amp;E has consulted L&amp;W and its predecessors on relevant SREP 30 matters, including previous amendments. It is also understood that L&amp;W is consulted by PCC, as relevant, on precinct plan and DA matters. However, Lendlease would be willing to be involved in any further consultation with L&amp;W as deemed appropriate by DP&amp;E.</li> </ul>

Submitter ID	Issue	Response
<b>Natural Resources Access Regulator</b> (submission dated 26/6/18)	<ul style="list-style-type: none"> <li>• NRAR proposes the proponent amends the documentation and proposal to meet the requirement of the <i>Water Management Act 2000</i>.</li> <li>• NRAR recommends the following:               <ul style="list-style-type: none"> <li>○ The proponent must undertake additional investigations to demonstrate to NRAR the scale of impacts to watersources and their mitigation or management will not result in substantial changes to groundwater and surface water systems across the precinct.</li> <li>○ The proponent may require licensing of dewatering activities undertaken as a result of the project. This applies not only to dewatering required during construction of the drainage basins, but also for any building excavations that may be required.</li> <li>○ The proponent must ensure that the lining or sealing of all basins receiving water flow is undertaken to prevent concentrated recharge to any groundwater system, or the discharge of saline seepage from the basins.</li> <li>○ NRAR considers that the three monitoring bores are not sufficient for the size of the site and the need to monitor discrete aquifers. Additional bores in consultation with NRAR.</li> <li>○ Routine and regular monitoring is to continue from the existing bores and be supplemented by the additional new bores. An adequate baseline monitoring period for each individual Development Application will be required.</li> <li>○ The bore monitoring network must be maintained throughout the precinct development. Records of groundwater levels and the results of water quality testing, as described in the Water, Soil and Infrastructure Report, are to be provided to NRAR:                   <ul style="list-style-type: none"> <li>▪ at any time adverse effects to water environments are detected, and</li> <li>▪ for the full period of the development at the completion of the project.</li> </ul> </li> <li>○ The conceptual hydrogeological model for the precinct is to be revised to accommodate the reported mixing of water and the presence of a major structural feature in the vicinity of the project. This is required to improve</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The proposed SREP amendments relate to minor amendments to existing drainage zone boundaries.</li> <li>• A detailed Water, Soil and Infrastructure Report was submitted with the planning report outlining the rationale for the proposed amendments</li> <li>• Issues raised in this submission relate to DA level of detail rather than rezoning, as per the current proposed SREP amendment.</li> </ul>

Submitter ID	Issue	Response
	<p>the understanding of groundwater and surface water interaction and the potential for adverse impacts arising from the development.</p> <ul style="list-style-type: none"> <li>○ It is advised that adaptive specific controls may occur due to the impacts of development on soils and water quality arising.</li> <li>● The proponent must consult with NRAR about matters that have the potential to impact groundwater systems as specified within SREP 30, in particular the Water Cycle Management Strategy, the Water Management Strategy and Precinct Plans.</li> </ul>	
<b>Sydney Water</b>	<ul style="list-style-type: none"> <li>● Requests DP&amp;E to provide notice of any further changes</li> <li>● Requests DP&amp;E to provide expected staging information for the development</li> <li>● Network extensions or amplifications may be required to service the redevelopment areas. These will be assessed at the section 73 (Sydney Water Act) application stage.</li> <li>● Sydney Water notes that attention should be given to the appropriate use of land, based on flooding constraints.</li> <li>● It is noted that there is a potential risk to existing Sydney Water assets in the development of any new roads, infrastructure and construction of buildings. These will be considered at the Section 73 (Sydney Water Act) application stage, however there is an opportunity to work with other infrastructure delivery partners to minimise disruption, duplication, or abortive work, and we would welcome the opportunity to investigate options for streamlining delivery to coordinate and future-proof works.</li> </ul>	<ul style="list-style-type: none"> <li>● Noted and agreed. Relevant utility stakeholders have been consulted including Sydney Water, Endeavour Energy, Jemena and Opticomm and suitable lead-in infrastructure will be provided with sufficient capacity to service residential land use.</li> <li>● The proposed rezoning will not change the flooding dynamics and PMF assumptions and conclusions established for the overall St Marys Precinct, including the Central Precinct.</li> </ul>
<b>State Emergency Service (SES)</b>	<ul style="list-style-type: none"> <li>● Specific concerns with the proposed evacuation approach from the Central Precinct primarily relate to:               <ul style="list-style-type: none"> <li>○ Evacuation timeline analysis undertaken to support the amendment</li> <li>○ Suggestion that vehicle queueing is an acceptable emergency response strategy</li> <li>○ Suggestion for local evacuation centres/commercial facilities to deal with the evacuees who may be required to queue on roads for lengthy periods of time</li> <li>○ Cumulative Impact of development on evacuation</li> </ul> </li> <li>● The likely risk to community safety during a flood, it would seem that SREP 30 performance objective 28(7) is not achievable.</li> </ul>	<ul style="list-style-type: none"> <li>● Molino Stewart has prepared an additional analysis to respond to the issues raised in NSW SES's submission (See section 2.4 of and Appendix 4).</li> <li>● This additional information concludes:               <ul style="list-style-type: none"> <li>- The maximum queueing time for evacuees from Jordan Springs East (Central Precinct) would be 7 hours and, for those in the higher parts of the development, they are unlikely to have to queue at all. This compares to the 15 hours or so that existing evacuation</li> </ul> </li> </ul>

Submitter ID	Issue	Response
	<ul style="list-style-type: none"> <li>• The proposed development does not create enhanced community resilience and may result in increased community reliance on the emergency management sector.</li> <li>• To properly evaluate evacuation capacity for the Central Precinct a more detailed analysis of the current and future-state would need to be undertaken, taking into account the interaction of evacuation traffic streams from the Hawkesbury and Penrith areas.</li> <li>• The recommended strategy identified by Molino Stewart creates a significant community safety risk that assumes that queuing on evacuation routes is an appropriate emergency management strategy for a large population.</li> <li>• The proposal to use local evacuation centres or commercial facilities to deal with the extensive queuing times is not considered to be acceptable.</li> <li>• It is unlikely that there will be sufficient resources to set up and operate multiple large local evacuation centres in conjunction with the establishment of a central Mass Care Facility by the Welfare Services Functional Area and NSW Policy Force during severe flooding in the Hawkesbury Nepean valley.</li> <li>• The efficacy of having commercial facilities as an alternate means to support queued traffic during a severe flood must be fully evaluated as this strategy has the potential to create additional risks to life and property.</li> <li>• Makes comments on the Molino Stewart letter and the cumulative impact of development on evacuation (see submission).</li> </ul>	<p>traffic from Richmond, Londonderry, Windsor or Bligh Park might have to queue while they wait for each other to use The Northern Road.</p> <ul style="list-style-type: none"> <li>- Jordan Springs East is more than 10 times less likely to have to queue than these areas to the north. There is about a 1 in 500 chance per year that any evacuation of Jordan Springs will be necessary at all and less than a 1 in 70,000 chance per year that it would all have to be evacuated.</li> <li>- Jordan Springs East does not have to start evacuating until close to when evacuation routes to the north are cut by flooding. Accordingly, queuing times in Jordan Springs East are not particularly sensitive to the number of vehicles evacuating from these other areas, the rate of rise of floodwaters nor the available warning time.</li> <li>- Furthermore, because all of the development scenarios at Jordan Springs East would see the entire precinct developed, the ultimate scale of the Jordan Springs East development only has an impact on the number of evacuees queuing, not on their queuing times.</li> </ul>
<b>Infrastructure NSW (INSW)</b>	<ul style="list-style-type: none"> <li>• INSW supports the NSW State Emergency Service flood evacuation assessment and recommendations.</li> </ul>	<ul style="list-style-type: none"> <li>• See response to SES submission.</li> </ul>

Submitter ID	Issue	Response
<b>Penrith City Council</b>	<p><b>Rezoning of the employment area to urban</b></p> <ul style="list-style-type: none"> <li>• The proposed rezoning is inconsistent with the planning priority of retaining and managing industrial and urban services land. Council believes that the land should be safeguarded from conversion to residential development and should be retained as industrial and urban services land.</li> <li>• The proposed rezoning will remove opportunities to reduce the gap between job supply and demand in Penrith and Western Sydney more generally. The provision and availability of suitably located, zoned and serviced land makes a significant contribution to reducing the gap between the job supply and demand in Penrith.</li> <li>• The proposed rezoning will remove opportunities to provide jobs in a location close to the resident workforce.</li> <li>• The proposed rezoning does not respond to future opportunities provided by the Western Sydney Airport and associated infrastructure. The employment land will be better positioned and connected, in coming years, to significant transport infrastructure and existing industrial and urban services land. The land should be safeguarded from the immediate pressure from the residential rezoning proposal.</li> <li>• The proposed rezoning removes the opportunity to respond to an immediate need for smaller industrial units or business premises.</li> <li>• The proposed rezoning is not supported with an analysis of alternative land uses. A review of appropriate activities, that accommodates evolving business practices and changes in the need for urban services, should be undertaken for the employment land.</li> <li>• The proposed rezoning is not required to meet current housing targets and could impact on currently planned residential development.</li> <li>• The proposed rezoning may impact on regional flood evacuation efforts.</li> <li>• Should the proposed rezoning of the employment area proceed, discussions should commence to secure the necessary infrastructure and facilities to service the extended community. At a minimum, the developer should be required to enter into a Development Agreement that secures:             <ul style="list-style-type: none"> <li>○ A monetary contribution towards employment generating initiatives to help meet any shortfall in job creation.</li> <li>○ The provision of appropriate local open space and community facilities to service and support the new community.</li> </ul> </li> </ul>	<p><b>Rezoning of the employment area to urban</b></p> <ul style="list-style-type: none"> <li>• Section 2.3 of this Report and Appendix 1 address the justification for the proposed rezoning of employment lands. In summary:             <ul style="list-style-type: none"> <li>- The EDS Review provides a comprehensive, strategic review of the status of the Central Precinct Employment zone, consistent with the strategic review of industrial lands for local environmental plans contemplated in the Western City District Plan.</li> <li>- The EDS Review concluded that the Central Precinct Employment lands are at a major competitive disadvantage when compared to existing (and proposed expanded) centres due to factors such as its isolation and limited labour catchment.</li> <li>- The EDS Review found that although the job to resident ratio of 1:1 is no longer appropriate and that a job ratio of 0.4:1 would more appropriately apply to the St Marys Development site, the rezoning of the Central Precinct Employment land would maintain the current ratio in the order of 1:1 (note: it is not proposed to vary this ratio through the proposed amendment).</li> </ul> </li> </ul>

Submitter ID	Issue	Response
	<ul style="list-style-type: none"> <li>○ The delivery of affordable housing, at least 3% of the proposed homes.</li> <li>○ Necessary local transport upgrades within the release area<sup>1</sup> (noting that local transport upgrades outside of but required to support the release area are already the subject of a voluntary planning agreement).</li> <li>● Suggests that DP&amp;E should also consider identifying the uplift in land value generated by the rezoning and the implementation of a value capture scheme to provide additional public benefit for the future and surrounding communities.</li> <li>● The proposed rezoning will require the submission of an Amending Precinct Plan.</li> </ul> <p><b>Amendment of drainage areas, including rezoning to Regional Park</b></p> <ul style="list-style-type: none"> <li>● Supports the proposed revisions to the size and location of the land zoned to provide drainage.</li> </ul> <p><b>Proposed rezoning of Farm Dam Park</b></p> <ul style="list-style-type: none"> <li>● Supports the rezoning of land from Urban to Regional Park.</li> </ul> <p><b>Internal Road and Intersection Assessment</b></p> <ul style="list-style-type: none"> <li>● The modelling supporting this study has been undertaken to a 2021 horizon year; it should be modelled to 2026, allowing 5 years post development traffic impacts to be assessed. For reference, the external network has been modelled to 2036 being a 10-year horizon.</li> <li>● There are concerns that the mid-block capacities of 1000 vehicles per lane are too high, and the 1000 is exceeded at some sections of Lakeside Parade. The report references a divided carriageway as having a 1000 vehicle upper limit, and the proposal is not for a divided carriageway. Lower thresholds for the proposed roads of 750-900 should be adopted in line with the previous modelling undertaken for the St Marys Development Area.</li> <li>● Provision should be made for Lakeside Parade and The East-West connector road to accommodate future upgrades, including a widened bridge structure to allow for a future 4-lane road.</li> <li>● The study notes that the intersection of Jordan Springs and Lakeside Parade is likely to fail once both Jordan Springs and Jordan Springs East are completed and indicates an upgraded layout (Table 8.9). However, it is unclear if any material</li> </ul>	<ul style="list-style-type: none"> <li>- The EDS Review demonstrates that the land is not suitably located for an Employment zone.</li> <li>● In addition, the Applicant is proposing to contribute a further \$1,580,000 on a number of additional job creation initiatives to be implemented through the EDS. These initiatives will supplement investment in job creation initiatives to date align with PCC's strategic employment initiatives.</li> <li>● Appendix 1 addresses the finalised <i>Greater Sydney Region Plan</i> and <i>Western City District Plan</i>.</li> <li>● The proposed Urban zone still enables a number of employment generating uses as permissible development, including as child care facilities, clubs, community facilities, educational establishments, home activities, home businesses, hospitals, hotels, retail and commercial premises, medical centres, professional consulting rooms, public buildings, recreation establishments, recreation facilities, and shops. The proposed Urban zone provides for a logical land use outcome in this part of the Central Precinct and is consistent with its original zoning when SREP 30 was gazetted in 2001.</li> <li>● In addition, employment lands are available on the St Marys Development site in the existing and proposed North and South Dunheved Precincts. The two precincts are targeted for completion by</li> </ul>

Submitter ID	Issue	Response
	<p>benefits will result when the intersection is upgraded as the modelling results show an unchanged level of service and queue length. The intersection should be modelled to 2026 and must display material benefit when upgraded. The delivery of the upgrade, must be a works-in-kind offer as part of the rezoning approval.</p> <p><b>Water Soil and Infrastructure Report</b></p> <ul style="list-style-type: none"> <li>• The following discrepancies should be clarified:           <ul style="list-style-type: none"> <li>○ The report indicates there are only 5 bioretention systems in the Central Precinct. However, the approved Stormwater Management Report (prepared by Cardno in Jan 17) includes a commitment to construct 7 basins.</li> <li>○ The report also states that the 35 ha sub-catchment in the north of the Central Precinct drains into Basin B for treatment. The approved Report includes a commitment to install a raingarden with a filter area of 3,300m<sup>2</sup> to treat runoff from the northern catchment prior to discharging from the site.</li> </ul> </li> </ul>	<p>2021. Further employment uses will be provided in the Jordan Springs, Jordan Springs East and Ropes Crossing Town Centres.</p> <ul style="list-style-type: none"> <li>• As noted in the response to the Transport for NSW submission, the Outer Sydney Orbital Corridor is yet to be finalised and its progression is subject to relevant environmental studies, planning approvals and land acquisition. There is no certainty, at this time, that the Outer Sydney Orbital will proceed through the St Marys Development site or, if so, the timing for its completion. Given this level of uncertainty, it is considered unreasonable for the proposed rezoning of the Central Precinct for much needed additional housing supply and other permissible development in the Urban zone, to not proceed.</li> <li>• The proposed rezoning is generally consistent with the assessment criteria set out for Council's <i>Accelerated Housing Delivery Program</i>, as it will contribute to the supply of affordable and diverse housing within the 5 years. The rezoning is also generally consistent with Council's <i>Penrith Urban Strategy Managing Growth to 2031</i>, as discussed in section 4.2.4 of the Planning Report.</li> <li>• Flooding and Evacuation – see section 2.4 of this Report, responses to SES and INSW submissions and Appendix 4.</li> </ul>



Submitter ID	Issue	Response
		<ul style="list-style-type: none"> <li>• Contributions – See section 6.4 of the Planning Report. It is noted that:               <ul style="list-style-type: none"> <li>○ Lendlease has committed to a monetary contribution of \$1.58 million towards additional employment generating initiatives.</li> <li>○ The provision of additional local open space and community facilities to service and support the new community will be negotiated through an amendment to the Penrith Planning Agreement.</li> <li>○ Affordable housing contributions are covered in the St Marys State Development Agreement and these obligations will continue to be complied with</li> <li>○ Necessary local transport upgrades within the release area<sup>1</sup> (noting that local transport upgrades outside of but required to support the release area are already the subject of a voluntary planning agreement).</li> </ul> </li> <li>• The Applicant will prepare an Amending Precinct Plan should the Amendment be made.</li> </ul> <p><b>Amendment of drainage areas, including rezoning to Regional Park</b></p> <ul style="list-style-type: none"> <li>• Noted.</li> </ul> <p><b>Proposed rezoning of Farm Dam Park</b></p> <ul style="list-style-type: none"> <li>• Noted.</li> </ul>

Submitter ID	Issue	Response
		<p><b>Internal Road and Intersection Assessment</b></p> <ul style="list-style-type: none"> <li>WSP has prepared an additional analysis to respond to the issues raised in Council's submission regarding the internal road and intersection assessment (Appendix 6).</li> </ul> <p><b>Water Soil and Infrastructure Report</b></p> <ul style="list-style-type: none"> <li>Cardno have prepared additional advice to address issues raised by Council (Appendix 5).</li> </ul>
<b>Public Submissions</b>		
253017	<ul style="list-style-type: none"> <li><i>Do not let more destruction of this beautiful land happen! This area is a treasure for Western Sydney and the community, housing the last natural habitat for emus and kangaroos in Sydney. Don't turn the whole of this beautiful natural environment into more ugly, generic housing.</i></li> <li><i>There is so much opportunity to use this space for education and natural preservation. Most importantly leaving a space for these beautiful animals to live. Humans already take up far too much room, just leave a small pace for the animals.</i></li> </ul>	<ul style="list-style-type: none"> <li>The proposed amendment does not propose any further development areas on the St Marys Development Site. It principally relates to the rezoning of land already zoned for development from Employment to Urban. This land has been zoned for development since SREP 30 was originally gazetted in 2001.</li> <li>Additionally, the rezoning results in an increase of 3.2 ha of Regional Park, comprising:             <ul style="list-style-type: none"> <li>1.2 ha from rezoning of the drainage basins</li> <li>1.2 ha from the rezoning of Farm Dam Park from Urban to Regional Park.</li> <li>8,675 m<sup>2</sup> ha from the rezoning of additional land in the northern part of the Western of the Precinct</li> </ul>             This means that the proposed amendment actually results in a net increase of land           </li> </ul>

Submitter ID	Issue	Response
		zoned for conservation purposes in Wianamatta Regional Park.
253033	<ul style="list-style-type: none"> <li>• <i>...object to the St Marys rezoning proposal SREP30 on the grounds Lend Lease has continually changed the original zonings on the old ADI site to increase the number of dwellings. Employment in the area has not been catered for as per the original proposal for the site.</i></li> <li>• <i>There is not enough open space for the increasing population to create a healthy life style. Please say no so the people of Jordan Springs have the chance to work, live and play in their suburb</i></li> </ul>	<p>Loss of employment land</p> <ul style="list-style-type: none"> <li>• As outlined in section 6.1 of the Planning Report, the rezoning of the Central Precinct Employment zone returns the northern part of the Central Precinct to urban zoned land, which is consistent with its original zoning when SREP 30 was gazetted in 2001.</li> <li>• The proposed rezoning is supported by a review of the St Marys Employment Delivery Strategy (EDS) which found that the land is significantly disadvantaged for employment uses due to factors such as isolation from larger, strategically significant employment areas and lack of access to major transport infrastructure. In particular, the planned expansion of the Western Sydney Employment Area, which has occurred following the rezoning of the Central Precinct for employment purposes in 2009, places the Employment zone at a major competitive disadvantage.</li> <li>• Accordingly, it is considered a poor land use outcome to maintain the Employment zoning when it is demonstrably unfeasible and when other land uses could be pursued to meet other strategic planning objectives such as housing supply and affordability.</li> <li>• The EDS also found that although the job to resident ratio of 1:1 on the site (clause 32 of SREP 30) is impractical, the rezoning of</li> </ul>

Submitter ID	Issue	Response
		<p>the Central Precinct Employment land would maintain the current ratio in the order of 1:1 (note: it is not proposed to vary this ratio through the proposed amendment).</p> <ul style="list-style-type: none"> <li>• However, it also notes that the Applicant has supported job creation within the St Marys Development Site via the Skilling and Employment Centre (SEC) in the St Marys town centre, which has facilitated achievement of 5,000 jobs. The SEC has also facilitated, through direct funding and partnership, skill development and training for 1,900 people.</li> <li>• In addition, the Applicant has committed to further expenditure of \$1.58 million on additional job creation initiatives</li> </ul> <p>Open Space</p> <ul style="list-style-type: none"> <li>• Open space at Jordan Springs and Jordan Springs East is provided in accordance with the adopted Western and Central Precinct Plans and includes an extensive network of active and passive recreation areas.</li> <li>• This open space network will be extended into the rezoned area of Jordan Springs East (Central Precinct) following rezoning.</li> <li>• There is additional open space for Jordan Springs residents through the Wianamatta Regional Park, with public access to the Western and Central areas of the Wianamatta Regional Park to be delivered in later stages of development.</li> </ul>

Submitter ID	Issue	Response
253050	<ul style="list-style-type: none"> <li>• <i>More houses is ridiculous to move around our area now there is so much traffic. Everyone uses dunheved road which is now a standstill in the afternoon and this is a result of jordan springs. Our street is also busier as people use it to go around the traffic and use back streets.</i></li> <li>• <i>The cars are speeding down our street and now i dont let my kids play out the front.</i></li> </ul>	<ul style="list-style-type: none"> <li>• As outlined in section 6.1.4 of the Planning Report, the rezoning of employment to urban land would generate 102 less trips in the weekday AM peak and 3 more trips in the weekday PM peak. Accordingly, the rezoning will have limited impact on the external and internal road networks.</li> <li>• In addition, a Regional Traffic Assessment has been undertaken which establishes a wide range of road infrastructure upgrades which are being captured in ongoing negotiations between the Applicant and Penrith City Council on the Penrith Planning Agreement.</li> <li>• These works include construction of a new road connecting Links Road (near the frontage of the South Dunheved Precinct) to Christie Street. This will provide an additional road access point to the St Marys Development Site. Lendlease and Council are continuing negotiations on the delivery of this new road.</li> </ul>
253056	<ul style="list-style-type: none"> <li>• <i>My objection relates to this proposal include- Before the ADI site was approved the argument by politicians who supported Lend Lease developing the site was that it would not be a dormitory suburb whereby people left home each day to travel outside Penrith for work but would be a model development with homes and jobs on site. This is clearly not the case, and this proposal with make this problem worse.</i></li> <li>• <i>One of the Arguments put forward at the approval processes from Lend Lease for more housing on the ADI site each time they apply for Amendments to already set plans for the site - is usually they bring jobs and employment to the area - well this is only short term, while the houses are being built, - once the development is completed and the builders/trades move on. The Residents are left to travel on</i></li> </ul>	<ul style="list-style-type: none"> <li>• Loss of Employment lands – see response to submission 253033.</li> <li>• Traffic – see response to submission 253050.</li> <li>• Filling of Central Precinct – filling of the Central Precinct has been approved through the adoption of the Central Precinct Plan and a number of subsequent DAs. As outlined in section 6.1.3 of the Planning Report, the proposed rezoning would not result in any change to the</li> </ul>

Submitter ID	Issue	Response
	<p><i>already congested roads and public transport, that has not improved as fast as housing in the west, and as it is improving the added traffic puts us back to square ONE. We and left with little infrastructure that is not ready to cope with an even larger population with no more local industry as promised and few local jobs already. The re-zoning would put a strain on the already fragile flood plain in the Central Precinct - with the tons of fill brought into the ADI site , this raises- the salinity levels in the surrounding areas of Central Precinct - we are getting brick work re done on our house for the second time because of salt damage to brickwork. Hopefully have found a solution with a salt treatment and brick sealer after having spent over \$20,000 on repairs and my house is not the only one with this problem and having repairs done. (salinity levels in soil rising) This will only get worse if more houses are approved and the flood plain is altered yet again with more additional fill. Also there will be an extra stain on an already straining sewer and water and electricity system. So this proposal for an additional 500 homes should DENIED in my opinion. We need - Employment/Industry not more housing.</i></p>	<p>location or amount of fill imported to the St Marys Precinct or the resulting (approved) topography of the site. The proposed rezoning would not change the flooding dynamics and PMF assumptions and conclusions established for the overall St Marys Precinct, including the Central Precinct.</p> <ul style="list-style-type: none"> <li>• Salinity - As outlined in the Water, Soil and Infrastructure Report prepared by Jacobs for the Planning Report, the proposal is unlikely to result in surface salinization and that the measures proposed in the report, including raising the ground level by filling and consideration of limiting infiltration, will further reduce this possibility. Development will be designed and carried out so as to ensure that there is no significant increase in the water table level and that adverse salinity impacts will not result.</li> <li>• Infrastructure – as outlined in section 6.5.6 of the Planning Report, utility authorities were consulted during the process all have agreed that suitable lead-in infrastructure will be provided, and the servicing infrastructure will have the capacity to service the proposed residential use in the Central Precinct.</li> </ul>
253089	<ul style="list-style-type: none"> <li>• <i>I disagree with further development of Jordan Springs.</i></li> <li>• <i>The Penrith area is already congested, there is not enough jobs or infrastructure to support additional housing in Jordan Springs. The Northern Road is a nightmare to drive along. Also please take into account the displacement of our native animals</i></li> </ul>	<ul style="list-style-type: none"> <li>• Further development of Jordan Springs - see response to submission 253017.</li> <li>• Traffic – see response to submission 253050.</li> </ul>

Submitter ID	Issue	Response
	<p><i>which is already evident when numerous Emu's and Kangaroos are wondering around Jordan Springs, Werrington, Cambridge Park etc. Also note the further destruction of habitats for beetles, most notably the obvious reduction in Christmas Beetles.</i></p> <ul style="list-style-type: none"> <li>• <i>Further more the displacement of snakes putting the community at risk as well as our pets.</i></li> <li>• <i>For the love of community, do not do this.</i></li> </ul>	<ul style="list-style-type: none"> <li>• Flora and fauna – see response to submission 253017 (ie, there will be a net increase to land zoned for conservation purposes under the proposed rezoning). Also, as outlined in section 6.5.3 of the Planning Report, the area of land within the Central Precinct proposed for rezoning to Urban has been fully assessed under the Central Precinct Species Impact Statement, which concludes that no significant impacts are predicted. Existing management plans already prepared for the Central Precinct will satisfactorily manage the risks to the biodiversity and ecology of the Central Precinct.</li> </ul>
255624	<ul style="list-style-type: none"> <li>• <i>Again, it seems that Lend Lease wants to take more of the land we fought for to build houses, 500 of them. This is not a good idea as there will be horrendous drainage problems that could pollute the existing parklands, also pollution created by people who buy houses, they are not exactly the type of people who are conservation minded. The other fact is Lend Lease will be again destroying valuable threatened Cumberland plains woodland. Making a place for employment might be a better option, so long as its not going to pollute the area. The fact that a lot of us fought for many years to try and save this land for a park and see what has happened to this land is heart breaking. Lend Lease does what it wants. I am against more houses been built because of loss of bushland again.</i></li> </ul>	<ul style="list-style-type: none"> <li>• Further development of Jordan Springs - see response to submission 253017.</li> <li>• Flora and fauna – see response to submissions 253017 and 253089.</li> </ul>
255834	<ul style="list-style-type: none"> <li>• <i>I propose that the bus access via Werrington County needs to be made into an all-vehicle access point. The proposed maps clearly show that there is adequate entry points for cars on all sides of the new developments, with the exception of the Werrington County side. In case of an emergency (such as bushfire), evacuation points are far too restricted in the Woodland Plains district.</i></li> </ul>	<ul style="list-style-type: none"> <li>• The bus only access to Werrington County was included in SREP 30 to minimise potential traffic impacts on residential areas to the south of the St Marys Development Site.</li> <li>• All external traffic modelling does not assume any private vehicle egress or ingress into the St Marys Development Site</li> </ul>

Submitter ID	Issue	Response
		from the adjoining Werrington/ Werrington County. <ul style="list-style-type: none"> <li>An evacuation route via the Werrington County bus only road has been identified in the flooding and evacuation report prepared for the Planning Report and Appendix 4.</li> </ul>
255838	<ul style="list-style-type: none"> <li>As a local resident about to move into the central precinct, it is already bad enough that there is no direct connection to Dunheved road. Also the current main entrance is a 50km road via Jordan Springs which is already getting busy with residents moving in and construction vehicles around. Coming from Stage 2 it takes 10 minutes just to reach the Northern Road.</li> <li>Lendlease and Council need to provide another access point in and out of the area with a particular focus on Dunheaved Rd. Even if it means allowing light vehicles i.e. cars use the current exit designated for buses only. This would limit the traffic going through Werrington county but make it easier for residents. This access would also allow children to attend Werrington County PS (our closest school with no access to it) and also easier access to M4, train station and hospital.</li> <li>Access plans need to be put into place urgently.</li> </ul>	<ul style="list-style-type: none"> <li>See response to submission 253050</li> </ul>
255859	N/A	<ul style="list-style-type: none"> <li>N/A</li> </ul>
255889	<ul style="list-style-type: none"> <li>direct access to Dunheaved Rd needs to be completed due to increased residents, to allow better access to M4, schools and hospital.</li> </ul>	<ul style="list-style-type: none"> <li>See response to submission 253050</li> </ul>
256797	<ul style="list-style-type: none"> <li>I wish to object to the Rezoning of Industrial Land to Housing in Central Precinct under SREP30 From the point of view of a Resident, we have watched and endured many changes, backdowns and backflips during the development process of the ADI site under SREP30.</li> <li>With Lendlease not having met their obligations for Road Improvements and Traffic Lights etc, Lendlease have at stages successfully lobbied Council for them to be able to actually build less affordable housing lots in their Jordan Springs Development, Not More. In turn they would then honour their obligations to put infrastructure in place for Traffic and the Northern road. All of which was part of</li> </ul>	<ul style="list-style-type: none"> <li>Loss of Employment lands - see response to submission 253033</li> <li>Traffic - see response to submission 253050.</li> </ul>



Submitter ID	Issue	Response
	<p><i>their obligation in developing this lot in the first place anyway, but they were pushing back against.</i></p> <ul style="list-style-type: none"> <li>• <i>Lendlease lobbied for a revision in 2016 which was approved and has already seen them allowed to add another 470 Houses into Jordan Springs and Central Precinct. Now they want to add another 500 on top of that, to an already impending traffic nightmare on local roads that already can't cope. With todays modern families 500 Houses equals approx 1000 more vehicles &amp; 1,000-3,000 more people. This on top of the other 940 odd extra Vehicles already added with the addition of the last 470 Lots.</i></li> <li>• <i>In 2009 in what I believe was a well Pre-Meditated move, Lendlease successfully lobbied to have the 2 Industrial Areas in the ADI site development moved from the Practical West and East ends of the Development that have good Traffic Access, into the less Practical Central Precinct. In a move that was clearly thought out well in advance they now say that this Central Precinct area is impractical for Industrial Land due to a lack of Major Traffic Infrastructure &amp; citing Affordable Housing as a need. This is Laughable, as the only key factor driving this is that house lots are worth a lot more than an industrial park. This has nothing to do with Affordable Housing &amp; everything to do with profits. In Lendlease's independent Studies undertaken for this proposal they say that that People living in these developments don't work in these areas, but leave the area for work.</i></li> <li>• <i>The clear reason for this is common sense!</i></li> <li>• <i>Housing developments are being built with No Opportunity for residents to be able to seek local employment.</i> <ul style="list-style-type: none"> <li>- <i>People have no choice other than to travel when Housing Developments continue to be built without infrastructure for employment.</i></li> <li>- <i>Given the opportunity, I guarantee that almost everyone in our local areas would like to work closer to home if the opportunities existed.</i></li> <li>- <i>The proposed Employment Industrial Zone backs almost adjacent to Existing Industrial Zone, so extending this Industrial Park would be beneficial in the area.</i></li> <li>- <i>Attracting Businesses to the area can only be Beneficial in the overall growth of the Penrith area.</i></li> </ul> </li> </ul>	

Submitter ID	Issue	Response
	<ul style="list-style-type: none"> <li>• <i>With the increase in Traffic entering Jordan Springs as it has grown over the past few years, we have seen huge issues arise in Traffic in peak times.</i></li> <li>• <i>An Industrial application generates much smaller amounts of Traffic over the entire day, not just in peak times like Housing does.</i></li> <li>• <i>For an example one of one seriously overstressed road, the Trip from the Great Western Highway at Werrington along Werrington Road and then on to Dunheved Road up to Werrington County shops is approx. 4.5kms From 3pm Weekdays to 6.30pm Weekdays this 4.5kms can often take 25mins to 35mins to traverse. This has been bought about directly by the large volumes of vehicles now using this road for access across to Jordan Springs. With Central Precinct being built now &amp; using the same access roads, I am very worried to think how bad this is going to get.</i></li> <li>• <i>The Northern Road/ Great Western Highway Intersection is another every bit as bad as this for the same reasons.</i></li> <li>• <i>With everybody leaving for work and coming home at similar times to travel "outside" for work, this can only decline further.</i></li> <li>• <i>I really do not believe that we cannot just continue to jam in more and more housing with no consideration to employment &amp; better opportunities for the people living in the areas just for the sake of builders profits.</i></li> <li>• <i>We need to stand up and ask why these obligations are not being met by Lendlease.</i></li> </ul>	
<b>256830</b>	<ul style="list-style-type: none"> <li>• <i>The plan was originally approved with this employment Precinct. No factors have changed. If there is no employment Precinct then all those employees will have to travel daily outside of the suburb, increasing already bad congestion. If you put another 500+ houses it will be even worse. This is not quality suburban building.</i></li> </ul>	<ul style="list-style-type: none"> <li>• See response to submission 253033</li> </ul>
<b>257217</b>	<ul style="list-style-type: none"> <li>• <i>I oppose Lendlease's proposed amendment to SREP 30 to have the employment zoning changed to urban. Our local area needs the jobs and employment lands not more housing and associated traffic congestion.</i></li> </ul>	<ul style="list-style-type: none"> <li>• Loss of Employment lands - see response to submission 253033</li> <li>• Traffic - see response to submission 253050.</li> </ul>
<b>257238</b>	<ul style="list-style-type: none"> <li>• <i>I oppose Lendlease's proposed amendment to SREP 30 to have the employment zoning changed to urban. Our local area needs the jobs and employment lands not more housing and associated traffic congestion.</i></li> </ul>	<ul style="list-style-type: none"> <li>• Loss of Employment lands - see response to submission 253033</li> </ul>

Submitter ID	Issue	Response
		<ul style="list-style-type: none"> <li>Traffic - see response to submission 253050.</li> </ul>
257384	<ul style="list-style-type: none"> <li><i>This proposal is contrary to the aims of the Three Cities Sydney strategy. That strategy envisages an economic corridor between Western Sydney Airport and St Mary's along a new rail line. To support economic development in this corridor, employment land will be needed and given priority. Rezoning of the employment land in the Central Precinct to residential will reduce the chances of significant economic development in the WSA-St Mary's corridor and generally exacerbate the jobs/population imbalance across western Sydney and increase commuting flows into eastern Sydney.</i></li> </ul>	<ul style="list-style-type: none"> <li>The site is not located within the Western Economic Corridor.</li> <li>A supplementary review of the amendment against the <i>Greater Sydney Region Plan</i> and <i>Western City District Plan</i> has been undertaken for the Amendment (See Appendix 1). The proposal is consistent with the relevant strategic plans as it will contribute to the housing supply and affordability targets and objects of the Region and District plans.</li> <li>Loss of Employment lands – see response to submission 253033</li> </ul>
257404	<ul style="list-style-type: none"> <li><i>I oppose Lendlease's proposed amendment to SREP 30 to have the employment zoning changed to urban. Our local area needs the jobs and employment lands not more housing and associated traffic congestion.</i></li> <li><i>I would like to be able to work close to my home and not have to travel 50 minutes each way to get to work.</i></li> </ul>	<ul style="list-style-type: none"> <li>Loss of employment lands - see response to submission 253033</li> <li>Traffic - see response to submission 253050.</li> </ul>
258244	<ul style="list-style-type: none"> <li>I do not support the conversion of employment land to residential given traffic concerns. I have concerns about the excess peak directional traffic being generated (which would have had opposite balanced flows had this been an employment zone). There will also be a loss of self-containment of traffic with the precinct as the loss of jobs means residents will have to travel outside the precinct.</li> <li>Intersections along The Northern Road (between Great Western Highway and Andrews Road) already operate well above capacity and the extra directional flows generated by converted low density housing will intensify this issue.</li> <li>I also have concerns about open space land being rezoned to regional park which is not accessible for residents/visitors. The plans indicate higher density residential (south of the retail) in the western precinct near this land. Therefore,</li> </ul>	<ul style="list-style-type: none"> <li>Loss of Employment lands - see response to submission 253033</li> <li>Traffic - see response to submission 253050.</li> </ul>

Submitter ID	Issue	Response
	<p>with the loss of this land and higher intensification of residents in the whole area, I have concerns that open space will be more in demand and not easily accessible.</p>	
<b>258773</b>	<ul style="list-style-type: none"> <li>• <i>The maps and information provided on the website is not clear or detailed.</i></li> <li>• <i>I have a home on Emmaus Road, Jordan Springs and need to know the following information:</i></li> <li>• <i>Why is the zoned drainage being done across the road in the bush?</i></li> <li>• <i>Where is the exact location? (map does not show streets, hard to know distance from house, etc)</i></li> <li>• <i>The size of the zoned drainage?</i></li> <li>• <i>Why wasn't this planned during development stage and ready before land sales?</i></li> <li>• <i>When will it start?</i></li> <li>• <i>Will it be maintained? (I have been here since August 2017 and never seen anyone maintain the bush area which has rubbish in it)</i></li> <li>• <i>What is the purpose of the dam?</i></li> <li>• <i>How will the mosquito/insect issue it brings be dealt with?</i></li> </ul>	<ul style="list-style-type: none"> <li>• The Drainage zones have been identified on the SREP 30 zoning map since its gazettal in 2001.</li> <li>• The Amendment proposes to refine the boundaries of a number of Drainage zones to better respond to changes to the boundaries of developable land on the St Marys, and to improve the efficiency and maintenance arrangements for the basins. These proposed amendments are outlined in Section 3.1 and Figures 8-11 of the Planning Report.</li> <li>• Lendlease has commenced the preparation of Environmental Impact Statements for the construction of Basins B and I, with a view to lodgement of DAs with Penrith City Council later this year.</li> <li>• These DAs will outline the proposed design, operation and management of the detention basins in detail.</li> </ul>
<b>258933</b>	<ul style="list-style-type: none"> <li>• <i>please provide access to Dunheaved Rd, needed for the increase residents, etc. Also better access to M4, School and hospital</i></li> </ul>	<ul style="list-style-type: none"> <li>• See response to submission 253050.</li> </ul>
<b>259315</b>	<ul style="list-style-type: none"> <li>• <i>I oppose Lendlease's proposed amendment to SREP 30 to have the employment zoning changed to urban. Our local area needs the jobs and employment lands not more housing and associated traffic congestion. Traffic is a major issue in this area and this proposed amendment will only add to this problem. Lowering the employment rate in the area by adding more housing and less employment opportunities will increase the local crime rate, another problem that is getting worse.</i></li> </ul>	<ul style="list-style-type: none"> <li>• Loss of Employment lands - see response to submission 253033</li> <li>• Traffic - see response to submission 253050.</li> </ul>
<b>259780</b>	<ul style="list-style-type: none"> <li>• <i>Will there be any road works undertaken to off-set the impacts of the additional population?</i></li> </ul>	<ul style="list-style-type: none"> <li>• See response to submission 253050.</li> </ul>

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259905	<ul style="list-style-type: none"> <li><i>I oppose Lendlease's proposed amendment to SREP 30 to have the employment zoning changed to urban. Our local area needs the jobs and employment lands not more housing and associated traffic congestion.</i></li> </ul>	<ul style="list-style-type: none"> <li>Loss of Employment lands - see response to submission 253033</li> <li>Traffic - see response to submission 253050.</li> </ul>
<b>Blacktown and District Environment Group</b>	<ul style="list-style-type: none"> <li><i>It is not clear what environmental impacts will arise from these amendments because the finer details of the alteration are yet to be determined by NPWS and the Department of Planning.</i></li> <li><i>Stormwater run-off from 500 houses will have more adverse impacts on South Creek and vegetation management in the Regional Park than an Employment Zone.</i></li> <li><i>BDEG believes that this matter would need to be referred to the Commonwealth Government for an assessment under the EPBC Act because this is a significant change to what was originally approved by the Commonwealth Government under the EPBC Act.</i></li> <li><i>Because the NSW Government is considering a change to SREP 30 for this matter, the government should also take the opportunity to alter SREP 30 to accommodate the previously announced (as per attached media release) intention to include a Nature Reserve within the core part of the Regional Park.</i></li> </ul>	<ul style="list-style-type: none"> <li>The Planning Report sets out a comprehensive assessment of relevant environmental issues, including biodiversity and stormwater.</li> <li>These issues will be further addressed through on-going process, including amendment of the Central Precinct Plan and relevant DAs.</li> <li>As outlined in section 4.1 of the Planning Report, the Commonwealth Department of Environment and Energy has confirmed that the proposed amendment does not require further assessment or approval under the EPBC Act.</li> </ul>