



27 May 2020

TfNSW reference: SYD14/01487/03

Alex O'Mara
Deputy Secretary, Place, Design & Public Spaces
Department of Planning, Industry & Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: [REDACTED]

Dear Ms O'Mara

NOTICE OF EXHIBITION - PROPOSAL TO AMEND THE STATE ENVIRONMENTAL PLANNING POLICY (PENRITH LAKES) 1989

Transport for NSW (TfNSW) advises that legislation to bring Roads and Maritime Services and TfNSW together as one organisation came into effect on 1 December 2019, so we can deliver more integrated transport services across modes and better outcomes to customers and communities across NSW. This letter represents the views of the new TfNSW organisation.

We appreciate the opportunity to comment on the proposed amendment to the *State Environmental Planning Policy (Penrith Lakes) 1989* (the SEPP), which was referred to us by the Department in correspondence received 27 April 2020.

We have reviewed the Consultation Paper outlining the intended effect of the proposed amendment, and note that it does not specify the total area of additional employment land proposed to be rezoned under the SEPP amendment. Based on our approximations, the amendment to the SEPP appears to substantially increase the total employment area.

Depending on the types of employment uses pursued, this increase has the potential to generate upwards of 1,000 vehicle trips per hour which will have significant impacts on the surrounding road network, if/when the development uplift is realised. The intersections of Castlereagh Road with Old Castlereagh Road and Lugard Street would likely need to be upgraded to support the additional trip generation potential. The traffic generated may also impact the McCarthys Lane intersection further north.

Further, the Penrith Lakes precinct is situated in the Hawkesbury-Nepean floodplain and immediately adjacent to the Nepean River, with a high flood risk with widespread extent and depth of inundation. Expanding urban development across the Hawkesbury-Nepean Valley means that flood exposure will increase in the future, and so growth will need to be carefully managed in the Valley to reduce the flood risk. The impact of the proposed development on the cumulative evacuation task should be assessed to ensure that the proposal does not result in increased risk to life during a flood evacuation. As flood evacuation will predominantly be by private vehicles, the capacity of the road network to cater for flood evacuation events should be carefully considered.

Transport for NSW

27-31 Argyle Street, Parramatta NSW 2150 | PO Box 973, Parramatta CBD NSW 2124
P 131782 | W transport.nsw.gov.au | ABN 18 804 239 602

The proposed uplift should be supported by a transport study to identify the impacts and mitigation measures, and an infrastructure implementation plan to support the future development. The transport study addressing the above matters should be exhibited with the SEPP amendment.

To this end, we note that the Department has commissioned a transport study which is currently investigating the impacts of the Penrith Lakes precinct and infrastructure requirements. We strongly recommend that the SEPP amendment is not finalised until the transport study is completed with a supporting infrastructure implementation plan to ensure delivery of the necessary infrastructure.

Should the SEPP amendment occur prior to the finalisation of the transport study, a mechanism should be in place to ensure developer contributions will be collected on an equitable basis to fund the infrastructure needed to support the expansion of the employment land, noting there are challenges in negotiating multiple agreements on a site-by-site basis. The Department should be satisfied that the land components required to deliver this infrastructure are identified, safeguarded and dedicated/acquired to ensure the future delivery of infrastructure, in-line with Objective 1 of the Greater Sydney Region Plan.

We look forward to working with you in the development of the transport study and infrastructure implementation plan.

Should you have any questions or further enquiries in relation to this matter, Rachel Davis would be pleased to take your call on phone 8849 2702 or email: development.sydney@transport.nsw.gov.au

Yours sincerely



Cheramie Marsden
Senior Manager Strategic Land Use
Land Use, Networks & Development, Greater Sydney