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04 March 2025

**Icon Oceania**

c/- RP Infrastructure  
(sent via email)

**Your Ref:**

**Our Ref:** LTR009-01-21-860 RtS Responses.docx

**Attention:** Matthew Murphy (RP Infrastructure)

**Email:** [matthew.murphy@rpinfrastructure.com.au](mailto:matthew.murphy@rpinfrastructure.com.au)

Dear Matthew,

**RE: WESTGATE KEMPS CREEK – 253-267 ALDINGTON ROAD, KEMPS CREEK  
SSD-23480429 – RESPONSE TO SUBMISSIONS**

This letter outlines a response to submissions received from various authorities in relation to SSD-23480429, which seeks consent for subdivision, bulk earthworks (including retaining walls), civil infrastructure (roads, stormwater drainage, utilities), staged construction of four (4) warehouses and associated works (particularly stormwater management infrastructure, including naturalised trunk drainage).

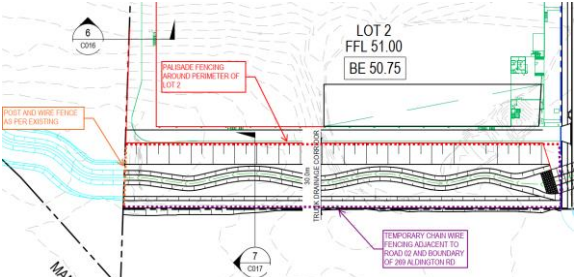
AT&L's responses to feedback and comments relating to civil engineering and stormwater management are contained below.

| Agency / Authority Comment                                                                                                                                                                                                                                                                         | AT&L Response                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Penrith City Council</b>                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <i>5ci. Prior to determination, the Department should ensure that the controls are met in terms of compliance with the stormwater and waterway health targets (for both the construction and operational stages) as well as any of Sydney Water's requirements with respect to trunk drainage.</i> | <p>Noted.</p> <p>Construction phase measures are addressed in the Erosion and Sediment Control Plan (ESCP) and will be further detailed in a set of staged Erosion and Sediment Control Plans that will be incorporated into a Construction Environmental Management Plan (CEMP) for the subdivision and infrastructure works.</p> <p>Operational phase water management measures are addressed in the Water and Stormwater Management Plan (WSMP).</p> |
| <i>5civ. The stormwater report states that interim no rainwater tanks are proposed. This is a departure from the DCP (Clause 2.4 (8)) which indicates they are required until the delivery of the regional stormwater management scheme. Clarification is requested.</i>                           | <p>Rainwater tanks have been deleted from the stormwater management strategy on the basis of advice from Sydney Water and confirmation from GBCA confirming their conditional approval of the consideration for Green Star projects within the MRP to claim potable water reductions using recycled water supply, noting that Sydney Water's supply network is not scheduled to be completed until 2028.</p>                                            |

| Agency / Authority Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | AT&I Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <p>5cvi. The Civil Report and Erosion and Sediment Control plan indicates that Type D sediment basins are proposed. This appears to be a departure from the Technical guidance for achieving stormwater management targets which indicates that they should be sized and operated in accordance with either a Type-A or Type-B sediment basin as documented in IECA (2008) Appendix B (June 2018) and be provided with an automated flocculating system. Clarification is sought but this should be considered.</p> | <p>Enlarged Type D sediment basins are proposed based on <a href="#">advice received by BCS on the application for the development at 113-153 Aldington Road</a>, a summary of which is provided below:</p> <p><b>Issue: Erosion and Sediment Control</b></p> <p>The Erosion and Sediment Control Plan (ESCP) document seems to restate requirements rather than detail specific strategies, while the plan (sheet C1101) is only applicable once final earthworks levels are reached. <b>The proposed approach of enlarged Type-D basins in lieu of high-efficiency basins is valid but presents additional challenges due to the space requirements (~900m<sup>2</sup>/ha).</b></p> <p><b>Information required</b></p> <p>Provide a revised ESCP which addresses the requirements of the Mamre Road Precinct DCP Section 4.4.2 and Technical guidance for achieving Wianamatta–South Creek stormwater management targets (DPE, 2022), which demonstrates achievement of the targets listed in Table 5 of the DCP. The revised ESCP is to specifically address the following:</p> <ul style="list-style-type: none"> <li>• Provide plans for each major phase of works, including clearing and grubbing, bulk earthworks (existing and final levels), civil works, and stabilisation/practical completion.</li> </ul> <p style="text-align: right;">2</p> <hr/> <ul style="list-style-type: none"> <li>• Identify the type of sediment basin and provide details for all functional components (e.g., forebay, level spreader, spillway, dosing system, flocculant type). Note that if enlarged Type-D basins are proposed then a space allowance of 900m<sup>2</sup>/ha should be provided.</li> <li>• <b>Provide sediment basin calculations demonstrating compliance with the DCP Table 5 targets (or adopt 900m<sup>2</sup>/ha).</b></li> <li>• Provide catchments plans identifying the sub catchments for all major drainage and sediment controls for each phase of works.</li> <li>• Provide calculation tables and sizing/dimensions for all major controls during all phases of works.</li> <li>• Provide a construction sequence identifying the order and timing for both the implementation and decommissioning of all controls, relative to specific site activities/hold points.</li> <li>• Provide details on the timing, methods and performance requirements for stabilisation of each area of site disturbance.</li> <li>• Provide specific advice in relation to dispersive soil management – particularly in relation to excavated drainage controls.</li> <li>• Provide details on how discharges from each basin will be managed so as not to reduce the hydrologic effectiveness of other basins (currently several basins are shown as inter-connected).</li> </ul> |
| Department of Planning, Housing and Infrastructure                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>2. Further information is required to understand the coordination and delivery of the road connection linking Road 2 with Frasers’ North South Access Road. Please provide the following:</p> <p>a. Details of how the road connection is proposed to be delivered and coordinated between the two parties, including staging / sequencing of works and timing for delivery and dedication to Penrith City Council.</p>                                                                                          | <p>a. The roadworks on the Edge Estate (Frasers Property Industrial) and Westgate Kemps Creek (Icon Oceania) will be delivered by the proponents’ respective civil works contractors to the property boundary between the two development sites. The need for construction of temporary cul-de-sacs will depend on the relative timing of the civil works. At this stage, given the status of the assessment of the respective SSDAs, it is possible that the roadworks will be delivered concurrently, meaning the temporary turning heads would not be required on either site. However, if for some reason the roadworks on one site are delivered in advance of the other, the extents of roadworks delivered first will need to incorporate the temporary turning head. Depending on interim operational and traffic management requirements, the temporary turning the extent of roadworks delivered second may also need to incorporate a temporary turning head.</p> <p>If the timing of roadworks on the two sites does not coincide and temporary turning heads on either site</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Agency / Authority Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | AT&L Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <p><i>b. Further detail of the levels of the Road 2 / Fraser's North South Access Road connection. Civil Sheet 21-860-C016 shows a section plan from within the vicinity of Road 2 with a potential 10 metre (m) ground level difference between the two sites (Section 4, shown below). Please provide a cross section at this location to demonstrate how access to Warehouse 1C will be achieved for the largest heavy vehicle, noting the following:</i></p> <p><i>i. road gradients shown in Civil Sheet 21-860-C930</i></p> <p><i>ii. proposed finished levels of Warehouse 1C,</i></p> <p><i>iii. proposed finished levels of Fraser's Edge Estate at the southern boundary, and the proposed Lot 14 access roads.</i></p> | <p>are in place, the completion of the roadworks on the site that comes second will need to include:</p> <ul style="list-style-type: none"> <li>■ Demolition of the temporary turning head on the neighbouring site</li> <li>■ Extension and connection of stormwater drainage and other utilities (details to be resolved by respective service designers)</li> <li>■ Construction of the final roadworks connecting the two sites.</li> </ul> <p>It is anticipated that a condition would be incorporated into the consent for Westgate Kemps Creek if Edge Estate is approved before it (or vice versa) requiring details to be provided for the connection of the two roads prior to the issuance of a CC or SWC.</p> <p>If the roadworks on the site completed first have been dedicated to Council, it is envisaged that the connection works would be subject to a Section 138 (Roads Act) Approval. If the roads are yet to be dedicated to Council, it is envisaged that the connection works could be completed under a SWC.</p> <p>b. Please refer to the revised drawing 21-860-C930[B] in Attachment A that shows the proposed road design joining Road 02 between Edge Estate and Westgate Kemps Creek. Additional details have been included in this drawing, including proposed road contours and levels at the property boundary at the driveways into Westgate Lot 1C and Edge Estate Lot 14.</p> |
| <p><i>3. The Department understands that Anrich (sic) is proposing to develop its land immediately south of the site. Consider opportunities to incorporate the ultimate road design of Road 1 in the DA and describe the coordination and sequencing works required to deliver Road 1 on both the site and Anrich's (sic) land.</i></p>                                                                                                                                                                                                                                                                                                                                                                                          | <p>The design of Road 1, which straddles the boundary between Westgate Kemps Creek and 269 Aldington Road, is being coordinated and will continue to be coordinated between the two landowners, Icon Oceania and Anric Group. AT&amp;L is currently engaged to undertake civil design to support development applications on both sites, hence the design of Road 1 will be fully coordinated across both sites.</p> <p>Incorporation of the half road within the Anric Group site into the scope of work under SSD-23480429 would require landowners consent from Anric Group and poses a risk to Icon Oceania in terms of increased scope of the SSDA (potentially protracting DA documentation and approvals). Whilst we understand Anric Group intends to progress their DA</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Agency / Authority Comment                                                                                                                                                                                                                                                                                                                         | AT&L Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|                                                                                                                                                                                                                                                                                                                                                    | <p>with Penrith City Council in coming months, there is no certainty or guarantee of the timing of their application and approval.</p> <p>At this stage, given the status of Masterplanning and design for the proposed development of 269 Aldington Road, it is Icon Oceania's preference to:</p> <ul style="list-style-type: none"> <li>■ Retain the currently documented scope of Road 01 in SSD-23480429.</li> <li>■ Continue liaising with Anric Group to monitor their programme for DA lodgement and construction of civil works post-DA approval.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                 |
| <p><i>10. The Submissions Report notes that a two-tier wall system has been proposed on the Frasers/Icon Oceania interface, yet the civil plans 21-860-C015 and 21-860-C016 only show tiered retaining walls at one portion of the common boundary. Please amend the plans to show the two-tier system along the Frasers / Icon interface.</i></p> | <p>Sections 3 and 4 shown on drawings 21-860-C015 and C016 respectively show the interface between proposed Lots 1B/1C and The Edge Estate to the north being a cut batter and rock lined swale within The Edge Estate. Retaining walls within The Edge Estate are shown within the civil works package that is current under assessment under SSD-17552047. It is noted that there will be two walls due to the proposed driveway that will provide access to Lot 14 from Road 02 within Edge Estate. The proposed wall directly adjacent to the boundary between Edge Estate and Westgate Kemps Creek will be up to 5.2 metres high, and given the location of this wall is not adjacent to the public domain or a public road it is not proposed that this wall would be tiered.</p> <p>Refer to <a href="#">drawing 20-776-C1006 and C1015 from SSD-17552047</a> that shows the proposed Fraser wall steps on this boundary.</p> |
| <p><i>11. The Department notes a Strahler order 2 waterway is identified on-site. Please demonstrate consistency with Section 2.3 of the MRP DCP in relation to the ongoing management and maintenance of riparian land.</i></p>                                                                                                                   | <p>Consistent with Sydney Water's Stormwater Scheme Plan (May 2024), the proposed development of Westgate Kemps Creek will incorporate a naturalised trunk drainage channel, for which design development has been undertaken with Sydney Water to reach a mutually agreeable corridor width, which varies between 20 metres and 32 metres throughout the site.</p> <p>Scape Design has prepared a Landscape Masterplan and Planting Plan for the naturalised trunk drainage corridor (Appendix I of the November 2024 Submissions Report).</p>                                                                                                                                                                                                                                                                                                                                                                                      |

| Agency / Authority Comment                                                                                                                                                                                                                                                                                                                                                                                                                                | AT&L Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <p>12. Provide additional commentary to support the modelling results outlined in section 8.2 and 8.3 of the Updated Water and Stormwater Management Plan (Appendix X of the Submissions Report) describing how the proposed stormwater management strategy complies with the Technical Guidelines for Achieving Wianamatta South Creek Stormwater Management Targets and relevant provisions of the MRP DCP.</p>                                         | <p>The proposed interim arrangement of stormwater management measures that are presented on drawing 21-860-C250 will ensure the proposed development of Lots 1A, 1B and 1C will comply with the stormwater quality and flow volume targets stipulated in Section 2.4 of the Mamre Road Precinct DCP.</p> <p>Once the Sydney Water regional scheme infrastructure that will service Westgate Kemps Creek is completed and ready to be connected to, the interim measures within Westgate Kemps Creek will be decommissioned.</p> |
| <p>13. The Submissions Report (Item 11, page 45) notes that in the event the downstream trunk drainage channel is not constructed at the time that the development commences operation, the trunk drainage channel would pond to a maximum of 1.2 m. Provide details of the safety measures (e.g. safety signage, fencing) that would be in place to prevent unauthorised access to the channel from members of the public or visitors to the estate.</p> | <p>Fencing will be installed adjacent to the trunk drainage channel to prevent access by the general public. Please refer to the sketch showing the proposed fencing types that would be adopted prior to completion of the trunk drainage channel downstream of Westgate Kemps Creek. The exact types of fencing will be the subject of further detailed design coordination with Sydney Water and Penrith City Council.</p>               |
| <p>17. Recommendation - post approval<br/>The proponent should ensure works within waterfront land are designed and constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land.</p>                                                                                                                                                                                                                                       | <p>Consistent with Sydney Water's Stormwater Scheme Plan (May 2024), the proposed development of Westgate Kemps Creek will incorporate a naturalised trunk drainage channel, for which design development has been undertaken with Sydney Water to reach a mutually agreeable corridor width, which varies between 20 metres and 32 metres throughout the site.</p>                                                                                                                                                             |
| <b>Conservation Programs, Heritage and Regulation Group (CPHR)</b>                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>1. Flood Risk Management</p>                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>AT&amp;L acknowledges feedback from CPHR relating to flood risk management.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>2. MUSIC model and flow spreadsheet</p>                                                                                                                                                                                                                                                                                                                                                                                                                | <p>Refer to the revised Water and Stormwater Management Plan and associated MUSIC model, which has been updated to address discrepancies in model setup and treatment node parameters.</p>                                                                                                                                                                                                                                                                                                                                      |
| <p>3. Stormwater strategy</p>                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>AT&amp;L will prepare detailed engineering plans for interim stormwater management measures, noting the timing of this issue has been designated as 'Prior to construction certificate'</p>                                                                                                                                                                                                                                                                                                                                  |

| Agency / Authority Comment                  | AT&L Response                                                                                                                                 |
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| 4. <i>Erosion and Sediment Control Plan</i> | AT&L will prepare a detailed Erosion and Sediment Control Plan, which will be provided with an application for subdivision works certificate. |

Should you have any questions, please don't hesitate to contact the undersigned.

Yours sincerely,

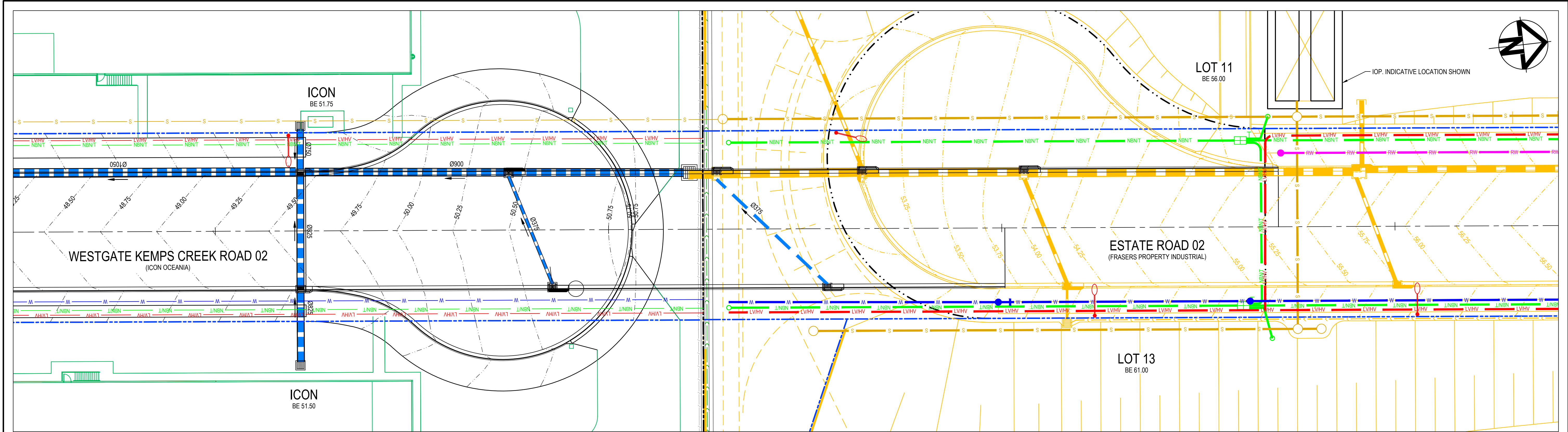


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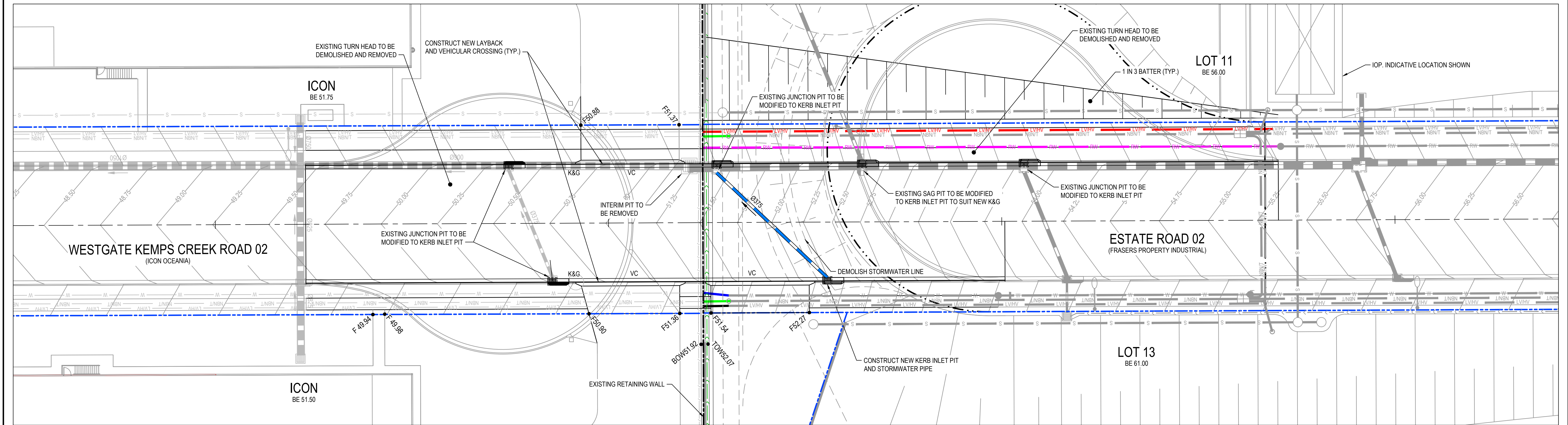
**ATTACHMENTS:**

DRAWING 21-890-C930[B] – ROAD CONNECTION LAYOUT PLAN





WESTGATE KEMPS CREEK ROADWORKS PLAN



FUTURE ROADWORKS PLAN

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