

9 December 2021

TfNSW Reference: SYD21/01385
DPIE Reference: DA21/15298

Mr Alexander Scott
Team Leader
Transport Assessments
Department of Planning Infrastructure & Environment
Locked Bag 5022
Parramatta, NSW, 2124

Attention: Fadi Shakir

Dear Sir/Madam,

**PROPOSED HELIPAD AT 100 OLD CASTLEREAGH ROAD, CASTLEREAGH
(ALLOTMENT 2 IN DEPOSITED PLAN 1013504)**

Reference is made to the Departments correspondence dated 4 November 2021 regarding the abovementioned designated Development Application for a proposed Helipad development on the subject lands, which was referred to Transport for NSW (TfNSW) for comment in accordance with the *State Environmental Planning Policy (Infrastructure) 2007*.

TfNSW has reviewed the development application documentation outlining the proposal which involves the following form of development:

- Maximum of 25 aircraft vehicle movements per day between the hours of 5:30am and 10:00pm with operation above this number of flights and outside these hours if required when undertaking emergency service works
- Demolition of two single storey sheds and integrated hardstand extending beyond the footprint of the sheds
- Demolition of one small single storey shed and associated pavement
- Removal of one inground water tank
- Removal of one flood light
- Removal of 12 trees
- New concrete hardstand
- Fitout of existing warehouse for helicopter maintenance and storage (hangar)
- Fitout of existing single storey building for use as ancillary office
- New lighting as required for the Final Approach and Take Off (FATO)
- Installation of small Jet A1 (Avtur) fuel storage tank

TfNSW understands that the proposed Helipad is to be operated as a private enterprise under the management of Sydney Helicopters who propose to relocate to the subject land from their existing site at Clyde. The helipad will operate as a commercial enterprise, including joy flights, and also offer emergency services operations, e.g during bushfires, medical services or the like.

TfNSW advises that based upon the current information provided a final informed response to the proposal is not possible until a response is provided from the Applicant to the following matters of concern:

1. Application documentation advises that the Sydney Helicopter operations at Clyde will be relocated to the subject land, however, no detailed assessment of the existing operations is provided for comparison with the proposal outlined.
2. Further detail should be provided to clarify the enterprise operations, i.e. commercial operations versus the emergency services operations/functions on a daily, weekly, annual basis;
3. The proposed flood evacuation procedures appear to incorrectly identify primary evacuation routes via the Great Western Highway which, in particular, includes egress from the site via a low-lying railway underpass at Penrith. The proposal should revisit flood evacuation procedures and include consultation with NSW State Emergency Services on the preferred regional evacuation path.
4. A DPIE (or SES) engaged flood expert review the proponent's evacuation modelling against the SES requirements for flood modelling and flood evacuation capacity and the flood emergency management plan.
5. Applicant be requested to address the draft Penrith Lakes Flood Response Guidelines.
6. Clarification should be provided on the site evacuation procedures during an emergency, i.e. use of helicopters for evacuation and/or vehicle evacuation;
7. Confirmation from the Applicant that the projected maximum occupancy on site 25 persons, notwithstanding that 20 full time employees are proposed along with 10-15 customers per day.
8. Clarification should be provided about the proposed helipad in relation to other land uses on the Penrith Lakes site i.e. will the helipad be an independent or interrelated land uses and will it be open for public usage;

TfNSW also reiterates broader Penrith Lakes issues that were raised in the TfNSW response dated 23 September 2021 (copy attached) to consultation on the proposed amendments to the Penrith Lakes SEPP which proposes the introduction of Heliports as a permissible use, along with various other amendments. Matters of particular relevance to the subject proposal include:

1. Necessity for a Transport Impact Assessment (TIA) is considered necessary to:
 - a) the sustainable total level and mix of development that can be accommodated on the site, noting the significant constraints on Castlereagh Road and nearby intersections; and
 - b) a feasible suite of transport infrastructure, services and travel demand management measures to be provided by the developer to support access to the development site;
 - c) assess lands already zoned for intensive urban development on the site and

potential substantial traffic impact on the surrounding road network. It is noted that the existing permissible uses on the site, including approximately 53ha of employment land which is likely to already exceed network capacity if developed.

2. The completion of the TIA referred to above would assist in determining a sustainable cap on the scale of development based on the cumulative assessment and feasible road transport upgrades, as identified and costed (including any land component requirements), to support access to the development and to mitigate the development traffic impacts on regional transport infrastructure.
3. Completion of a comprehensive TIA, accompanied by an infrastructure schedule and legally binding funding mechanism, needs to be agreed and in place prior to any intensification of development or introduction of additional traffic generating uses on the site. Upgrades on Castlereagh Road (both midblock *and* intersection upgrades) are likely to be required to support the existing uses permissible on the site and any proposed additional permitted uses,
4. Approval of additional developments resulting in an unsustainable level of development uplift on the site without understanding the traffic and transport impacts will result in additional infrastructure requirements, mitigation requirements, feasibility and funding issues

TfNSW has considerable concern where additional, potentially significant traffic generating developments are proposed and/or permitted within the Penrith Lakes Precinct where suitable assessment of the above matters has not been undertaken adequately.

If you have any further questions, Mr Chris King would be pleased to take your call or please email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely



Zhaleh Alamouti

A/Senior Land Use Assessment Coordinator