



23 December 2021

Pamela Morales
Principal Planner
Industry Assessments
Department of Planning and Environment
Via email: pamela.morales@planning.nsw.gov.au

Dear Pamela,

Comments on Environmental Impact Statement (EIS) for the First Building Bradfield City Centre at No. 215 Badgerys Creek Road, Bringelly (SSD-25452459)

Thank you for the opportunity to provide comments on the EIS for the State Significant Development (SSD-25452459) for the First Building Bradfield City Centre at No.215 Badgerys Creek Road, Bringelly (the site).

It is understood the proponent is seeking consent for the development of a building with an approximate building footprint of 2,840sqm for an Advanced Manufacturing Research Facility, and will include 51 temporary car parking spaces.

The Western Sydney Planning Partnership (the Partnership) does not object to the EIS. Comments on what should be provided within the Environmental Impact Statement are provided at **Attachment 1**.

I trust this information has been of assistance. If you have any more questions, please contact Lance Collison, Senior Planning Officer, Planning Partnership Office on 9860 1536 or via email at lance.collison@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "A. Pizzolato". The signature is fluid and cursive.

Anthony Pizzolato
Manager, Western Sydney Planning Partnership

Attachment 1 – Comments on SSD-23480429

Application assessed against the Western Sydney Aerotropolis State Environmental Planning Policy (Aerotropolis SEPP)

The land has been rezoned a combination of Enterprise and Mixed Use by the Aerotropolis SEPP and the proposal is permissible and generally consistent with the objectives of these zones. The EIS has made a specific detailed consideration against the following parts of the Aerotropolis SEPP.

Part 3 Development controls—Airport safeguards

The applicant must ensure that the proposal is consistent with aviation safeguarding requirements contained within the Western Sydney Aerotropolis Planning Package. This includes the Western Sydney Aerotropolis Plan and the Aerotropolis SEPP. More specifically, the applicant must address Section 5 (Safeguarding the 24-hour airport) of the Western Sydney Aerotropolis Plan and Part 3 (Development Controls-Airport safeguard) of the Aerotropolis SEPP.

The site is wholly within the 8 km wildlife buffer zone and partly within the 3 km wildlife buffer zone on the Wildlife Buffer Zone Map of the SEPP and careful consideration must be given to any proposed vegetation or landscaping to minimise wildlife attraction as per Part 3, Clause 21 of the Aerotropolis SEPP. Page 32 of the EIS advises the proposal is compliant to the SEPP in this regard.

The proposal does not fall within the land uses outlined as relevant development as per Clause 21(4) of the Aerotropolis SEPP so further assessment is not required in this regard. Nevertheless, Appendix E Consultation Outcomes Summary Report also advises Western Sydney Airport Corporation was provided a briefing and received feedback in support of the proposal and they expressed interest in reviewing the SSD application documentation.

Part 4 Development controls—general

Concurrence will be needed from Transport for NSW (Clause 29) as transport corridors traverse the subject site. Appendix E Consultation Outcomes Summary Report also advises as per SEARs, email sent to advise of project and request feedback to Transport for NSW. It is expected that further advice will be provided from Transport for NSW in due course.

Part 7 Precinct plans and master plans

It is noted that the Aerotropolis SEPP allows for certain development to proceed prior to the finalisation of precinct plans if it meets certain criteria. Clause 42(3) requires the applicant to specifically address whether not the development:

- is consistent with the aims of this Policy,
- will result in further fragmentation of land holdings,
- will hinder the orderly and co-ordinated provision of infrastructure that is planned for the land to which this Policy applies,
- is incompatible with, or will adversely affect, the long-term operations and development of the Airport,
- appropriately takes into account the development and infrastructure in areas adjacent to the development, and
- will be adequately serviced by public utility infrastructure.

Comment on these items are provided on Page 33 and 34 of the EIS. This advises the facility has been designed in consideration of the adjoining metro station and planned road

infrastructure and services and will be serviced through adequate public infrastructure once the metro is completed. We have no objections to this statement.

Design Excellence

It is noted, Part 5 of the Aerotropolis SEPP, the design process has included review by the State Design Review Panel (SDRP), with the initial SDRP review undertaken on 7 October 2021. It is advised The SDRP review indicated in-principle support for the design of the development and made recommendations for the design to address the following aspects:

- connecting with Country and landscape design – including connecting with water, empowering and enterprise in the Aboriginal Community and strategies to contribute to native fauna habitat

This is welcomed and it should be noted the Recognise Country: Guidelines for Development in the Aerotropolis which will provide further advice to design with country is proposed to be finalised in 2022.

Concurrence

Concurrence will also need to be sought from the Planning Secretary (Clause 50) for approval prior to finalisation of Precinct Plans to ensure suitable arrangements have been made for provision of infrastructure to support the development.

Application assessed against the Draft Aerotropolis Precinct Plan

It is assessed the proposal is generally consistent with the Draft Aerotropolis Precinct Plan. Appendix F provides an analysis of the Draft Aerotropolis Precinct Plan in the EIE and Appendix G provides analysis against the objectives of the Aerotropolis Core precinct of the Plan.

The EIE provides a thorough analysis against the relevant sections of the plan. Commentary is provided against, recognising country, blue-green infrastructure framework, access and movement framework and the social and cultural infrastructure framework. Regarding the land use and built framework, it is agreed the land use is permissible with consent, the built form complies with the obstacle limitation surface requirements and overall height requirements. The proposal will provide 22.3 jobs per hectare which is slightly under the guideline of 25-30 jobs per hectare for general industrial uses as per page 134 of the Plan, but this is not considered to a major concern and not a requirement.

Impressively given the site will be near a metro station, the proposal will include active frontages which will be aimed to engage the facility. The facility will be integrated with the street grid when further development occurs to ensure connectivity with the metropolitan core. The building will be adequately serviced and is within an initial precinct for priority development.

The proposal also is in general compliance with the objectives of the Aerotropolis Core Precinct. It provides for an advanced manufacturing research facility set to become a high technology hub to support the Aerotropolis Core precinct. This catalytic proposal also will assist the precinct becoming a global destination for business, tourism, and social experiences. The facility will incorporate education, research, and innovation into its operation

The proposal provides for 51 temporary car bays, but it is noted long term car parking will be capped at 18 spaces. Contradicting this Appendix H states 60 bays are proposed. Nevertheless, it is also noted the traffic and parking assessment concludes that the site will

be sufficiently serviced by transport solutions in the short term and will transition to reduced reliance on cars as infrastructure is developed throughout the Aerotropolis. This accords with the objective to significantly reduce reliance on single occupancy private motor vehicles for trips, enabling most trips in the Precinct to be undertaken using sustainable forms of transport such as public transport, walking and cycling.

The proposal will also protect the operations of the Airport, including 24-hour operations, and provide appropriate protections for the community.

The proposal will also aim to achieve a net zero emission in attempt to set a standard for future development to occur within the precinct which is in compliance with the precinct objective.

Documents recently on exhibition

It should also be noted several documents relating to planning for the Western Sydney Aerotropolis were on exhibition from 8 October 2021 until 5 November 2021.

These include,

- Western Sydney Aerotropolis Explanation of Intended Effect
- Luddenham Village Discussion Paper
- Western Sydney Aerotropolis Development Control Plan - Phase 2
- Draft Aviation Safeguarding Guidelines - Western Sydney Aerotropolis and surrounding areas
- Draft Recognise Country: Guidelines for Development in the Aerotropolis

While these documents are in draft form, it should be noted the EIE has considered the DCP Phase 2 in Appendix H. A review of submissions and edits to these documents listed above are well underway. A finalised Aerotropolis Precinct Plan and amendments to the Aerotropolis State Environmental Planning Policy is proposed to be finalised in early 2022.

It should also be noted these documents do not propose further changes to the zonings or objectives of the precincts and the zonings of this site lies within.

Application assessed against the Draft Western Sydney Aerotropolis Development Control Plan Phase 2

It is assessed the proposal has demonstrated consistency with the Draft Aerotropolis Development Control Plan Phase 2. The Draft Phase 2 document provides significantly more detail particularly in relation to performance outcome and benchmark solution requirements than the Phase 1 document and this analysis is welcomed. Appendix H provides an analysis of the proposal against this document in the EIE.

The WSPP generally agrees with the comments in support of the EIE on recognise country, biodiversity, access and movement, parking/ travel demand management, heritage, stormwater/ water sensitive urban design, building siting and design, airport safeguarding, flooding, sustainability and circular economy, services/utilities and smart places items.

It should be noted the building site only incorporates a small portion of the overall lot and is away from areas identified for biodiversity protection. It is also located away from waterways and is not in a 1:100 flood planning level.

--- END OF COMMENTS ---