

Department of Planning, Housing and Infrastructure
C/- James Gibbeson and Stuart Withington

Council Feedback on Proposed Mixed-Use Development – 135 Badgerys Creek Road, Bradfield

Dear Sir

Liverpool City Council was invited to comment and provide feedback on the submitted State Significant Development Application at 135 Badgerys Creek Road, Bradfield, for the construction of a mixed-use development consisting of Two Hotels, 402 Residential Units, Commercial tenancies, childcare centre and health service facilities across three (3) buildings.

Attachment A of this letter provides detailed commentary regarding the proposal being:

- A- Development Assessment
- B- Strategic Planning
- C- Urban Design
- D- Traffic and Transport
- E- Heritage
- F- Community Planning
- G- Flooding
- H- Natural Environment
- I- Land Development Engineering
- J- Public Art
- K- City Economy

In Summation, Council does not support the proposed development, with the application requiring significant amendments to demonstrate a compliant and succinct application in relation to the Planning Framework of the Western Sydney Aerotropolis.

Please do not hesitate to contact the undersigned should you have any additional enquiries or if you wish to further discuss the matters outlined in this referral.

Kind Regards,

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Attachment A – Detailed Commentary

A. Development Assessment Planning

- 1) Clause 35 of the EP&A Regulations 2021 requires that any development application for land within the Aerotropolis be accompanied by a clear and comprehensive statement demonstrating consistency with both the Western Sydney Aerotropolis Plan and the Western Sydney Aerotropolis Precinct Plan.

While the applicant has submitted a brief response, it is cursory, fragmented, and lacks the necessary depth and structure to constitute a genuine assessment of consistency. As such, the submission does not meet the requirements of Clause 35 and fails to satisfy this statutory obligation.

Chapter 4 – State Environmental Planning Policy (Western Parkland City) 2021

Part 4.3 Development controls—Airport safeguards

The site is located approximately 3km from the first runway and will be located less than 1.5km from the second runway once it is constructed. As such, the proposal will need to demonstrate compliance with the various airport safeguarding requirements in Clauses 4.17-4.23A

- 1) 4.19 – Wildlife Hazards –

An assessment and commentary is provided by Council Natural Landscape-Flora officers.

- 2) 4.21 Lighting-

A detailed lighting plan must be submitted to enable a proper and informed assessment of the proposal's compliance. In the absence of this information, it is not possible to determine whether the development satisfies the requirements of this Clause or the relevant Australian Standards.

Accordingly, it is not appropriate to defer this matter by way of a condition of consent, as there is no certainty that the proposal is capable of achieving compliance.

- 3) 4.22 Airspace Operations –

Council will defer this to the WSA Co to provide suitable commentary.

Part 4.4 Development Controls – General

- 4) 4.24 Flooding Planning –

The applicant has not addressed this provision.

- 5) 4.26 Heritage Conservation –

Council Heritage Officer has provided a detailed response pertaining to this, in which it has found it lacking suitable and appropriate assessment

6) 4.27- Transport Corridors-

The development has not suitably considered the widening of Badgerys Creek Road, Council defers to TfNSW to confirm.

7) 4.28b Aboriginal Cultural Guidelines-

Councils Heritage Officer has provided a response, and further commentary has been provided within the Landscape Led Approach of this section.

Part 4.5 Design Excellence

8) 4.32 Architectural Design Competition –

It is noted the application has proceeded on two occasions, however, notes the proposed development exceeds the 40m height limit and is subject to a design competition pursuant to Clause 4.32 of the SEPP.

This is a precondition to be satisfied prior to consent being granted, in which a design competition has not occurred. The rationale in appendix D does not sufficiently address the Clause, and the extent of the height breach is not relevant to the criteria stipulated in Clause 4.32 of the SEPP.

Council does not support an exemption to an architectural design competition.

9) 4.33 Consideration of Design Excellence -

On review, it is found the development exhibits several deficiencies, including limited cohesion in urban form, poor spatial integration, and an inadequate landscape strategy that fails to deliver high-quality visual or environmental outcomes. These shortcomings indicate an absence of the “Landscape Led Approach” mandated for the Aerotropolis, which is informed by the Designing with Country process. Therefore, Council cannot support the proposed development in line with the considerations pursuant to Clause 4.33 (2) of the SEPP.

Part 4.7 Precinct Plan and Master Plans

Clause 4.39 of the WPC SEPP imposes a mandatory requirement which development must demonstrate consistency with the objectives and strategic vision of the Precinct Plan. Non-compliance is not discretionary. The proposal lacks compliance on a number of key items under the Precinct Plan in which has been identified below:

- 10) While the WSAP Appendix Objective 4 and associated provisions under the WPC SEPP Clause 4.39, and WSA PP Clauses 2.1, 4.1, collectively encourage development which supports orderly and sustainable urban growth, this is subject to ensuring that

environmental constraints — including topography, riparian corridors, and site hydrology — are appropriately managed.

In this instance, the proposed extent of earthworks and disturbance within the riparian corridor directly contravenes the strategic intent of these controls, which emphasise minimal interference with natural landforms and the protection of natural drainage systems. The proposal fails to demonstrate how the modification of grades, cut and fill, and reshaping of natural landform will maintain the ecological integrity or hydrological function of the corridor.

11) 4.1 Proposed Land use and Structure Plan

Appendix D indicates that only 41% of the GFA is allocated to employment-generating uses. While no definitive threshold is provided for when residential development begins to undermine the intended function of the centre, the extent proposed appears excessive for a commercial core specifically envisaged to deliver employment opportunities within Western Sydney. This concern is compounded by the near-total removal of existing vegetation, including trees of medium to high retention value, with the exception of those outside the subject site. Notably, Tree T24—identified for retention—is shown within the footprint of a proposed road to the south, calling into question the feasibility and accuracy of the proposal.

12) 4.3 Aboriginal Culture and Heritage – Recognise Country

The proposal fails to adequately address the requirements of RC1–RC4 and does not demonstrate a genuine or considered response to Aboriginal cultural heritage. There is insufficient evidence the development has retained or meaningfully integrated access to areas of cultural value or conservation corridors, nor has it demonstrated a clear understanding of their significance (RC1). The application lacks a robust assessment of impacts on areas of Aboriginal sensitivity or any identified sites, and does not provide the necessary supporting documentation, to substantiate how impacts would be appropriately managed or mitigated (RC2–RC3).

Further, there is no clear or credible evidence of appropriate or expanded consultation with local traditional custodians to inform the assessment and proposed outcomes (RC4). As presented, the response is superficial and tokenistic, failing to demonstrate meaningful engagement or a genuine commitment to the protection, interpretation, and ongoing management of Aboriginal cultural heritage.

Commencing with Country is a mandatory prerequisite to the design and development of any site within the Aerotropolis. It informs the physical layout, built form orientation, and movement patterns that collectively embody the Aerotropolis' overarching landscape-led philosophy. It is one of the four (4) primary objectives set out under Clause 2.1 of the WSA Plan. The Recognise Country has failed to appropriately consider designing and respecting the Country in which Council refers the to Department to Case Law established last year being 170 Willmington Road Pty Ltd v Liverpool City Council [2025] NSLEC 1600 (22 August 2025) in which it held-

“It is the responsibility of the architect, landscape architect, planner and engineer to incorporate the recommendations [from the Recognise Country Template] into the concept and subdivision design.”

The current proposal fails to meet this obligation. The design does not incorporate, reflect, or respond to recommendations arising from the Recognise Country process, nor does it demonstrate genuine multidisciplinary collaboration in achieving a landscape-led outcome

13) 4.5 Blue-green Infrastructure Framework

The omission of Park Edge Street from the site precludes the opportunity for the residential component to be appropriately oriented toward it, thereby failing to achieve a suitable and functional public domain interface.

The proposal does not achieve a suitable tree canopy targets are stipulated by the DCP, furthermore the proposal seeks to rely upon the riparian corridor to deliver their deep soil. This is inappropriate, the Riparian Corridor calculations should be set aside given any subdivision would excise this portion of land, and each built form sites would not achieve required landscaping, deep soil or canopy cover. This would set an unrealistic and unruly precedent for the Precinct.

In summary, landscaping is an essential mechanism for achieving design excellence. A proposal that fails to adopt a landscape-led design approach—particularly within a precinct governed by the *State Environmental Planning Policy (Precincts—Western Parkland City) 2021*, the *Western Sydney Aerotropolis Precinct Plan*, the *Western Sydney Aerotropolis Plan 2020*, and the relevant Development Control Plan—cannot reasonably be regarded as satisfying the requisite design excellence standards or the intent of the applicable planning framework.

14) 4.6 Movement Framework

The Aerotropolis Precinct Plan identifies Park Edge Streets as key structuring elements within the Street Hierarchy Plan. These corridors are fundamental to achieving the landscape-led approach as they facilitate activation, connectivity, and delivery of the blue-green infrastructure network across the precinct. The proposed development fails to incorporate or make provision for these streets. This omission fundamentally erodes the intended landscape connectivity and undermines the precinct’s strategic framework by excluding the trees, pedestrian, and cycle connections that underpin the landscape-led movement structure.

No written request has been submitted to justify or seek a variation from this standard. Further, it appears the proposal has not adequately considered the future widening of Badgerys Creek Road or the delivery of the Collector Road along its eastern boundary.

As established in *Parramatta City Council v Hale and Ors* (1982) 47 LGRA 319, a consent authority is required to consider the interrelationship between developments and ensure that a proposal does not compromise the orderly and economic use of adjoining land. The current proposal fails to satisfy this obligation.

15) 5.1 Hierarchy of Centres

The site is located within the Metropolitan Centre area close to Bradfield City Centre, and the structure plan identifies this site as “Metropolitan Centre” land. The application must demonstrate the land use is compatible with the site’s location at the entrance to the city centre, addressing the controls in Part 5.1 of the Precinct Plan. The application has failed to address this, given the excessive bulk and scale of the built form facing Badgerys Creek Road and Bradfield City Centre, with main operational land use being a Hotel Function with little consideration of higher order services, social infrastructure and support services for a diverse community.

16) 5.2 Height

Documentation from the applicant states the Height of Buildings is 62 under the LEP, the LEP is not applicable to land within the Aerotropolis, height is set down by the Precinct Plan which holds Statutory weight.

Noting this, whilst the proposal does not exceed the prescribed height limit within the Precinct Plan the built form overshadows the Open Space immediately to the south, with the northern area of the park to be in shade majority of the day. This is not supported and not a suitable outcome to set a precedent on.

17) 5.3 Floor Space Ratio

The proposed variation to Floor Space Ratio is not supported by Council. The Gross Floor Area calculations differ from the Architectural Set and therefore Council cannot clearly ascertain the full variation sought.

Council calculation of the FSR exceeds that sought by the applicant and therefore can not support it.

The proposed variation to the Floor Space Ratio cannot be supported as it gives rise to a range of unacceptable planning outcomes that are inconsistent with the strategic intent for the precinct. The development results in overshadowing of the park, diminishing its amenity and usability, while also proposing the removal of all existing trees on site, contrary to the landscape-led approach envisaged for the area. The proposed GFA distribution, comprising approximately 58% residential and 42% employment uses, further undermines the intended employment-focused character of the centre. In addition, the justification for the increased GFA is largely driven by the provision of car parking that exceeds the maximum rates prescribed under the DCP, despite the site’s proximity (approximately 250m) to the metro, which is fundamentally at odds with the vision for a walkable, transit-oriented city.

The argument that such parking does not contribute to GFA due to its underground nature is not persuasive, particularly where the scale of parking is dictated by leasing demands. In this context, the excess GFA is effectively facilitating a car-dependent outcome, the impacts of which are expressed above ground through built form, bulk, and overshadowing. Collectively, these matters demonstrate that the variation is not justified and would result in an outcome contrary to the objectives of the planning framework.

18) 5.4 Yield and Density

The proposed development fails to satisfy the required yield and density outcomes for employment within the city centre. Based on the site area of 2.2 hectares, the applicable benchmark of 130–400 jobs per hectare equates to a requirement of approximately 268–880 jobs. While Appendix D identifies 510 operational jobs using the Department of Planning and Environment's Common Planning Assumptions (2023), this figure sits only marginally within the lower range and does not reflect a development that meaningfully prioritises employment outcomes expected within a designated commercial centre. This concern is reinforced by the proposed GFA distribution, with only 41–42% allocated to employment-generating uses and a dominant 58% residential component.

Such an outcome is inconsistent with the intent of a commercial centre and cannot reasonably be characterised as being “primarily located” for mixed use residential purposes. Accordingly, the proposal is contrary to YD01, as it does not prioritise employment-generating development and instead introduces a disproportionate residential yield in a location intended to support jobs and economic activity.

19) 5.6 Design Excellence

This provision has been addressed under 4.32 and 4.33 of the SEPP.

DCP

The proposed development does not comply with a number of DCP Controls, however, may be resolved through a revisiting of the issues identified above under the Precinct Plan. The following identifies a few key areas in which the Department should take into consideration:

- 20) The proposal does not comply with 2.1 of the DCP, it lacks a clear understanding and integration of the built form within the Recognise Country framework and is explored further within 4.3 of the Precinct Plan above.
- 21) Insufficient information has been provided to ascertain with compliance is achieved with water quality targets under 2.3 Stormwater, Water Sensitive Urban Design and Integrated Water Management, as identified from Council Flooding comments.
- 22) As previously discussed, the proposal does not comply with Section 2.4 Vegetation and Biodiversity, particular to Deep Soil and Tree Canopy Targets due to the incorporation and reliance upon the Riparian Corridor. This should be and must be excluded from all calculations to ensure delivery of appropriate and suitable deep soil and canopy cover is provided for each allotment. To include the Riparian corridor would set an unruly precedent in the Precinct and Council does not support this. Further landscaping comments have been provided from Councils Urban Design Section.
- 23) The development has a significant reliance upon basement car parking, in which does not take into consideration the Landscape led approach of the Aerotropolis, minimal cut and

fill, and the ability to have a walkable City Centre. Council Traffic Section has identified concerns relating to compliance under 2.7 Parking design and access of the DCP.

- 24) In regard to 2.9 Service and Loading design details are required to be provided to ascertain whether compliance can be achieved, if suitable access has been granted as ground level. Council Waste area is unable to provide commentary without the provision of detail design.
- 25) The proposed bulk earthworks are inconsistent with the landscape-led approach and requirements under 2.18 Earthworks and retaining walls. The extent of benching and filling to accommodate basement car parks and associated hardstand areas is both excessive and unnecessary given the site's relatively modest natural gradient. Earthworks within the Aerotropolis should respond to, and move with, the natural topography and hydrology of the land, thereby minimising cut and fill and preserving existing landscape character. Whilst basement carpark could be considered suitable, given it extends and encompasses more than 70% of the site, the current approach imposes an artificial platform that disregards these principles.
- 26) The applicant states public art is not proposed as part of the development however in regard to 2.19 Public Art of the DCP it is a requirement for development over \$20million. The applicant is required to prepare and consult with Public Art Policy and incorporate a submission and response with Designing and Recognise Country.
- 27) The proposal does not comply with the provisions under Chapter 4 and Chapter 4 of the DCP which are further discussed within the provision of the Precinct Plan above, which holds greater Statutory weight being:
- a. 4.1 Road network and Design
 - b. 4.2 Built Form
 - c. 4.3 Parking and travel management
 - d. 5.1 Road network and design
 - e. 5.2 Built Form
 - f. 5.3 Parking and travel management
- 28) The applicant has not provided an assessment against the Liverpool DCP in line with 6.6 Additional land uses of the DPC being:
- a. Childcare Centres

Proposed Childcare

- 29) A preliminary review of the proposed Childcare has been undertaken in which it does not appear to comply with the requirements under Chapter 3 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 and the associated Childcare Planning Guidelines.

As such, other concerns should be addressed first in terms of the overarching-built form, scale and delivery which may resolve the issues found for the proposed Childcare.

B. Strategic Planning

- 1) Council provided a checklist of required information for assessment in the response to SEARs. The majority of these reports have been provided, however all outstanding reports should be provided to allow for a complete assessment and to allow for the preparation of a complete EIS. Council requests that the application is re-referred once all information is available for assessment.
- 2) Quantity Surveyors Report – This report is required in order for Council's Contributions Planning Team to provide an accurate development contribution figure.
- 3) Hazards assessment in relation to proposed LPG storage is required. The "Infrastructure delivery, Management and Staging Plan" indicates that gas connection is not currently available to the site and that the design of the proposal has allowed for the provision of "Storage areas to locate localised gas storage tanks" (Infrastructure delivery, Management and Staging Plan, prepared by Neuron, Revision 01, dated 29/08/2025, page 13).
- 4) Civil Plans must demonstrate compliance with the location of all identified street locations in accordance with the Western Sydney Aerotropolis Precinct Plan (July 2025) (WSAPP). In this regard, supplementary survey data is to be provided identifying the WSAPP street alignment and this alignment must be detailed in the Civil Plans.
- 5) Construction Environmental Management Plan (CEMP) - This will be required to demonstrate how site stormwater and wastewater are proposed to be contained on site without impacting on or discharging into adjoining land.
- 6) An Interim Travel Demand Management Plan must be provided in accordance with Section 2.8 of the WSA DCP.
- 7) An Operational Environmental Management Plan is required for vegetation management as part of riparian area or overland flow path provision.
- 8) A Plan of Management and a Plan of Management for Tourist and Visitor Accommodation is required in relation to the proposal.
- 9) The EIS and associated appendices do not demonstrate how public art has been considered in relation to the proposal. As required in Council's comments relating to SEAR's, the application must include a Public Art Report and Plan identifying the provision of Public Art on the site to a scale that is commensurate with the proposed development.
- 10) The Architectural Plans are to be amended to include an overlay of the site and proposal for all relevant figures under the WSAPP including:

Figure 1: Land application map

Figure 2: Development Sequencing

Figure 3: Land Use and Structure Plan

Figure 4: Heritage and Cultural Landscapes

Figure 5: Blue-Green Infrastructure Framework

Figure 6: Total Water Cycle Management

Figure 7: Protected Existing Native Vegetation and Protected areas under the Cumberland Plain Conservation Plan

Figure 8: Transport Network

Figure 9: Active Transport Network

Figure 10: Street Hierarchy

Figure 11: Centres Hierarchy

Figure 12: Height of Building

Figure 13: Floor Space Ratio

Figure 14: Design Competitions

The EIS is to provide a detailed assessment of the proposal in relation to all relevant heads of consideration under the WSAPP and is to reference the relevant amended architectural plan including the above figures.

Any identified variation that triggers reconsideration under an EIS supporting Appendix must be provided for the consideration of Council as part of any follow up assessment.

The following issues must be resolved before the proposal may be considered for determination:

- 11) The proposal does not satisfactorily demonstrate that sewer connectivity is available to the site or will be available when required. This is contrary to Clause 4.49(1) of SEPP (Precincts – Western Parkland City) 2021. Council does not support development in the Western Sydney Aerotropolis unless it can be demonstrated that a gravity connection to the Sydney Water Sewer can be demonstrated. Council notes that the proposal seeks consent for “sewer holding tanks...as an interim solution” (Infrastructure delivery, Management and Staging Plan, prepared by Neuron, Revision 01, dated 29/08/2025, page 15). Council does not support this as a solution.
- 12) The “Infrastructure delivery, Management and Staging Plan” must be amended to clearly indicate current infrastructure availability, capacity and relevant timing of provision to the subject site and development. Clear information in this regard is required to demonstrate compliance with Clause 4.49 of SEPP (Precincts – Western Parkland City) 2021.
- 13) All road alignments and locations must be in accordance with the WSAPP.
- 14) The proposal is identified under “Figure 14: Design Competitions” of the WSAPP. The EIS, supporting appendices and supporting plans must demonstrate the process by which; design excellence, the progression to an Architectural Design Competition and compliance with the SEPP and WSAPP is achieved.
- 15) The EIS must demonstrate how the City Centre employment targets under “5.4 Yield and Density” of the WSAPP is achieved. The EIS (p37) indicates that “It is estimated that the development will provide approximately 510 new jobs to the site,” however no indication is provided in the EIS how this employment figure is estimated. The WSAPP requires 130 – 400 jobs per hectare in the city centre and this equates to 264 – 810 jobs for the proposed development. A clear breakdown as to how the employment targets are proposed to be achieved must be provided in support of the proposal.
- 16) The scope of the “Riparian Assessment,” prepared by Ecological, dated 10 October 2025 should be expanded to provide for conclusions and recommendations in relation to

improving the riparian area, identifying landscaping and habitat improvement works that can be incorporated into the civil, architectural and landscape plans to restore and rehabilitate riparian areas in accordance with section “4.5.2 Riparian Areas” of the WSAPP.

C. Urban Design

Context

- 1) Recognise Country - The Recognise Country initiatives appears to be throughout the landscape and applied to surfaces only. This is a significantly sized project, with high visibility from every side, particularly from the City Centre and park, therefore a stronger, aspirational and integrated Recognise Country approach is expected. As described in the Recognise Country Guidelines and Connecting with Country Framework, through collaboration with Traditional Custodians, Country could have informed other aspects of the design, for example the master plan, massing and heights more responsive to the unique topography of the site, location and cultural views.
- 2) Design Competition - Why the development is not undertaking a design competition process is queried, noting I the Precinct Plan map it is under ‘areas where locational exemptions under Clause 34(3) of the SEPP are unlikely to be granted’, and based on the map this is clearly due to it’s presentation to Badgerys Creek Drive. DE4 states exemptions for sites in this area, lists specific considerations which all relate to this site. It has visual prominence, addresses a major road and a key park, therefore a design competition should still be pursued. The 40m threshold described by the applicant is noted, however the strict adherence to this threshold to avoid a design competition has result in a compromised design, with a lack of varying height, responsive to the context, and larger, DCP non-compliant footprints that create greater overshadowing to the park.

Public Domain and Roads

- 3) South Road and Sportsfield - Urban Design note the general approach throughout the Aerotropolis when a new road is marked on the Precinct Plan it sits centred on the lot boundary line, with its deliver shared by each site. In this proposal however it appears the south boundary road is being incorporated entirely by the south site which is the future sportsfield. This approach is queried, and a reduction in the sportsfield is not supported. Recreational spaces are a critical aspect of the success of high density living.
- 4) Innovation South Road -Pedestrian footpaths are illustrated within the site boundary, and not in the public verge area. There should be a shared cycle path along the sportsfield site that is not indicated. The drawings illustrate both sides of the road yet also note that this road is by others. The drawings relating to this road need to be revised demonstrating the 5m verge outside the site boundary, including pedestrian paths, turf and tree planting as per the DCP street sections. Clarity of what works in the public domain are part of this scope, and what part are by others should be included.

- 10) Setback for street trees – The SDRP 2 Comment 11 response states that 14m street tree setback on Badgerys Creek Road has been provided, however this is before the road widening. This would be reduced to 5m after road widening and would not address this recommendation.
- 11) Mass planting in the verge – The 3D visualisations show mass planting in the verge, however the extent and species is unclear from the drawings. Mass planting instead of turf has benefits and could be supported as an improvement outcome for biodiversity and urban cooling however more information is needed. More information as to the species, extent, and maintenance required is requested. Coordination of mass planting and street parking access should be considered. Further coordination and detail will be required prior to CC.

Amenity

- 12) Overshadowing to the park and building footprint DCP non-compliance – Urban Design agrees with the SDRP comment 3 and 4:
- a. The justification provided that it would create increased shadow impact is not correct as it does not factor in how for amenity, solar access for landscape and open space, a taller slender shadow moves quickly and does not overshadow one area for as long compared to the shadow cast from a shorter, wider building.
 - b. Solar Access and amenity is the main objective of the DCP control of a maximum of 650sqm building floorplate, and the proposal is well beyond this.
 - c. The response does not demonstrate the portions of the park that do not receive 2 hours or more during mid-winter. With shorter towers larger footprints, there are more likely to be areas of park that do not receive any, or minimal solar access during mid-winter, risking vegetation unable to grow, and a poor amenity outcome for recreational space. Whereas if there were slim, taller buildings, that complied with the DCP building floorplate maximum, a larger portion of the park to receive solar access throughout the day.
 - d. The overshadowing to all the street trees and planting along Innovation South Road and impact to their solar access, ability to establish and grow in winter is a concern that also needs further consideration
 - e. The self-imposed 40m height constraint to avoid a design competition is not a good justification for compromised design and amenity.
- 13) Communal Open Space
- a. The extent of publicly accessible Communal Open Space is not correct. It includes almost the entire blue-green corridor minus the waterway itself. This is a highly public area, that provides recreational space and active transport infrastructure for and is part of the broader precinct. In addition a lot of this area is sloped and not useable for the typical uses anticipated for residents in a Communal Open Space. CDPD recognises that Communal Open Space can be publicly accessible, however a reduction of the publicly open COS is recommended, to a more realistic, usable portion.

- b. The publicly accessible COS under the Stage 1 tower should not be included at all, this area all relates to the commercial and hotel on top therefore is a focussed civic, public area.

14) Apartment Mix and 3/4 Bedrooms –

- a. The applicant's SDRP 2 Comment 17 response illustrates 'Couples with children' is the highest demographic. In the Liverpool LGA there is an identified need for family friendly, 3–4-bedroom apartments, and as such the Liverpool DCP recommends a minimum of 20% 3/4-bedroom apartment mix. The applicant response also indicates a market demand of 20-30% 3 bedrooms apartments. However only 17.9% is proposed. Urban Design emphasises the importance and rapidly increasing need to provide housing for families in high density living, and recommends a minimum of 20%, and preferably 25-30% 3/4 bedroom apartments are incorporated.

Built Form and Aesthetics

- 15) Active frontages to park – There is a excessively long stretch of blank inactive frontage addressing the park to the south and is a poor activation outcome. Increasing the active frontage facing the park is recommended and where blank facades are unavoidable, the length should be broken up with areas of activation. For example the bin holding room is taking up a significant portion of the park side façade and is not supported. Dimensions indicate the continuous stretch of fire doors, waste bins and loading measures 30-35m straight of inactive/blank façade.
- 16) Façade sections – Façade sections of 1:20 scale are requested to be provided as part of the SSDA, to capture the design intent, materiality, junctions as presented on the renders, and ensure it is carried through to construction. There are sections in the design report however they are not to scale, and there are portions of façade conditions missing such as the lower podium of Building B.
- 17) Planters on façade – There is an identified recurring issue in completed apartment projects where due to extreme heat planting in planter boxes is not surviving. The façade design relies on planting on the façade as a key part of the façade design and is at risk of being compromised if the planters are unsuccessful. Incorporation of strategies to ensure their survival are recommended, such as generous soil depths, species that can handle extreme heat, low maintenance and passive irrigation systems.
- 18) Glazing – Building A is an entirely glazed building which is inappropriate for the extreme heat experienced in western Sydney particular forecast for the Aerotropolis and not in line with Country-led design. This was also raised by the SDRP. The spandrels incorporated are minimal, and only on small select portions of the façade. Many hotel rooms do not have any spandrel protection. The spandrels and general façade design does not appear to relate to the sun orientation, for example the south façade ratio of spandrel protection is higher than the east façade, and the north façade should typically have horizontal protection whereas the east and west a balance of horizontal and vertical.

D. Traffic and Transport

1) Land use trip generation

It is noted the vehicle trip generation rates adopted for the assessment are based on the Bradfield TMAP 2036 vehicle trip rates. As indicated in the Bradfield TMAP, the 2036 transport scenario contain high public transport mode share target. Due to the current limited public transport infrastructure and service in 2026, the assessment should adopt the first principal approach to estimate vehicular trip generation based on TfNSW Guide to Transport Impact Assessment (TS 00085 version 1.1). The trip rates should be established based on the factors such as survey data of similar development sites, on-site parking rates and the existing public transport mode share for the precinct.

It is noted the subject site could generate around 836 person trips during the AM peak hour, 1,164 person trips during the PM peak hour, and 1,315 person trips during the Saturday peak hour. The existing car mode share for the precinct is between 80%-90% compare the proposed site mode share targets (32-37%).

The report is to be updated with the revised trip generation rates.

2) Traffic distribution

It is noted that the proposed traffic is to be distributed to the future road network including the proposed Eastern Ring Road (ERR) and the Metro link road. As the delivery timing of these roads are not confirmed, the proposed routes to the subject site are not available until 2041.

Should the subject development occur earlier than 2041, the traffic distribution and impact assessment should be carried out based on the existing road network.

3) Road network provision

The subject site is bounded by the following roads:

- Badgerys Creek Road
- Road No. 7
- The Centre Loop West
- A new local road

TfNSW is currently preparing a design plan to widen Badgerys Creek Road to a 4-lane urban road. The subject site is affected by the proposed widening. Hence, consultation is required with TfNSW regarding the required road reserve on the subject site.

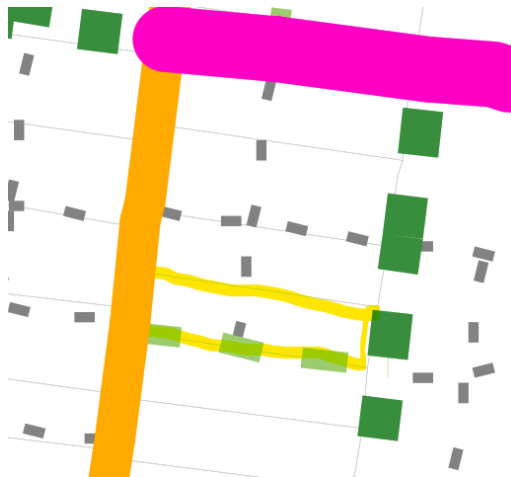
The BDA is currently constructing the centre loop west and Road No. 7. The development site is to incorporate the approved design layouts of Road No. 7 and the Centre Loop West Road to the site plan.

The proposed new local road on the subject site should be designed in accordance with the Western Sydney Aerotropolis DCP 2022 and Austroads Guide. Consultation is

required with Water NSW and Sydney Water for any infrastructure located within the Riparian Corridor.

The TIA report is to demonstrate adequate treatments are provided at the intersection of Road No. 7 and the proposed new local road.

The relocation of the Park Edge Street to the southern property is not supported and should be integrated within this Sites boundary, constructed and delivered in line with the WSAPP Street Hierarchy Map.



Extract of Street Hierarchy Map

4) Access arrangements to/from the subject site

The swept path analysis plan (ref. AG2775_02_v07.dwg) shows the proposed driveways are not wide enough to cater for two-way movements. The design of off-street commercial car park driveways must comply with AS 2890.2:2018.

The proposed routes to the subject site are to be updated based on the existing road network. Consultation is required with the BDA regarding availability of both construction and operational access roads.

E. Heritage

1) Overview

This referral provides an assessment of the submitted documentation for the proposed mixed-use residential and commercial development situated across Gung Gung Creek. While the submission includes a **Recognise Country Report**, the current approach fails to meet the strategic intent of the **Western Sydney Aerotropolis Development Control Plan (DCP)** and the **Recognise Country Guidelines**.

2) Aboriginal Cultural Heritage & Consultation

The submitted Recognise Country Report is currently deemed insufficient due to a lack of meaningful engagement and a superficial application of cultural values.

- **Breadth of Consultation:** Consultation has been restricted to a limited number of Traditional Custodians. There is a notable absence of engagement with **Elders and Knowledge Holders** from the local community. For a development of this scale within the Aerotropolis, consultation must be broad-based to ensure the spiritual and historical significance of the Gung Gung Creek corridor is captured.
- **Integration vs. Decoration:** The report focuses primarily on aesthetic treatments, such as surface finishes and public art. This "tokenistic" approach contradicts the Guidelines, which mandate a **nuanced integration** of Aboriginal cultural values. The development must demonstrate how Design Excellence is informed by the "Connecting with Country" framework—moving beyond ornaments to influence the actual form, function, and ecological restoration of the site.

3) Built Form & Landscape-Led Design

The current massing does not sufficiently respond to the unique topography of the Bradfield precinct.

- **Topographical Response:** The development must adhere to a **landscape-led approach**. It is recommended that the building heights be redistributed to follow the natural terrain.
 - **High Intensity:** Peak heights should be concentrated toward **Badgerys Creek Road** and the **Inner Loop Road**.
 - **Transition:** Building scales must progressively reduce in height as they approach Gung Gung Creek.
- **Visual Impact:** This "stepping" ensures that the creek corridor remains the primary ecological and visual feature of the site, preventing the waterway from being overshadowed by a dense wall of development.

4) Environmental Impact: Bird-Friendly Design

Given the proximity to the creek and the broader Western Sydney Parklands ecological corridors, the use of extensive glazing poses a significant risk to local bird populations.

- **Glazing Standards:** The applicant is required to meet **bird-friendly glass standards**. This can be achieved through:
 - Reducing the total percentage of external glass areas.
 - Utilizing **fritted glass**, UV-patterned glazing, or external screens to break up reflections.
 - Implementing non-reflective coatings to mask the transparency that leads to bird strikes.

5) Recommendations

It is recommended the following items be addressed via a **Request for Information (RFI)**

1. **Revised Consultation Strategy:** Expand engagement to include Elders and Knowledge Holders from the Liverpool and broader Western Sydney Aboriginal communities.
2. **Updated Recognise Country Report:** Demonstrate how cultural knowledge has influenced the structural design, water management, and landscaping, rather than just aesthetic "add-ons."
3. **Architectural Redesign:** Submit revised sections and elevations showing a height transition toward Gung Gung Creek and a detailed schedule of bird-safe glazing materials.

F. Community Planning

- 1) **Stages:** The EIS refers, 'The development is intended to be constructed and delivered in a staged manner. Each stage and their respective offering is listed below: Stage 1-Building A: Hotel, Retail Premises and Plaza, Food & drink premises. Stage 2: Hotel, supermarket, retail premises, commercial premises, food & drink (tavern). Stage 3: Retail (café), Residential Flat Building, Rehabilitation of Gung Gung Creek (p 45).'

Comment: Proposed development includes stages however it didn't mention the timeframe of the stages. We think staged development of a large residential and commercial development should explicitly mention a timeframe for each stage. At least a tentative timeframe is required including the time for regulatory approval, planning certainty, availability of utility and key service infrastructure. Staging should mention the timespan of consent, i.e. often 5 years of development consent in NSW.

This would help the potential investors and future residents for informed decision making and planning for futures with comfort and convenience. This would also support the project developer to cross check with relevant service providers and manage project risks.

We recommend additional information to clarify this.

- 2) **Housing Diversity:** The EIS refers, the residential component will include 402 dwellings in the following apartment mix: 1 bedroom 53 (13.2%), 2 Bedroom 277 (68.9%), 3 Bedroom 72 (17.9%) (p 48).

However, the proposal didn't mention if it has included the provision of affordable housing and adaptable housing?

Comment: The draft Western Sydney Aerotropolis precinct plan included a requirement for 5% of new mixed-use development with a residential component to be dedicated as affordable housing. However we are not certain with the updated status of these requirements.

The future Aerotropolis will be a destination of young professionals and knowledge workers, essential workers, growing families with low to middle income, indigenous residents, local workers, extended families exploring spacious accommodation etc.

While the NSW Government is pushing for more "low and mid-rise" housing (townhouses, low-rise apartments) within 800 metres of transport hubs to improve affordability, it is unclear how this will be applied to the specific, early stages of the Aerotropolis development, which is largely focused on business and industryⁱ.

Being in an accessible location, the development has a potential to support the community of diverse socio-economic status. We recommend including a certain percentage of affordable

housing and adaptable housing in the proposed housing mix to ensure access and inclusion (at least 10%).

- 3) **Social Infrastructure:** Australian Bureau of Statistics (ABS) refersⁱⁱ, 'The 2026 population forecast for Western area - Greendale, Luddenham (part), Silverdale (part) and Wallacia (part) is 7,125, and is forecast to grow to 30,097 by 2046. Change 2026-46 is 322.41%'. This includes the subject site and neighbouring areas.

The proposal did not mention how many additional populations will be generated in the subject area through this development. This should cover both the short- and long-term residents, visitors and commuting workers.

To ensure sustainability of the proposed planned neighbourhood, future residents will require all essential services close to their home.

The SIA aligns with our findings. It states, 'The workforce on site and future residents will place demand o existing infrastructure and services and any impacts associated with local social infrastructure must be identified. '(p18)

'There is limited existing social infrastructure within proximity to the subject site. The proposal will improve access to childcare, health/medical, and retail (supermarket) by providing this on site for future residents, as well as for broader community expected to live in the PSL. The proposal will also increase access to passive open space, with the rehabilitation of Gung Gung Creek.'

Comment: We recommend conducting a social infrastructure needs assessment projecting the total future population of the site. Based on this, scoping of future requirements should be ensured in the land use allocation of current proposal. We recommend considering a multi-purpose community centre as a part of this assessment. This can be attached to the childcare centre or separately.

- 4) **PoM:** The proposal should include a Plan of Management for the commercial components particularly the hotels and tavern. If these are planned to develop under separate DAs, this condition can be met in the individual DA stages. The PoM should consider safety and convenience of the future residents around the entire neighborhoodlike and additional surveillance around the 24/7 facilities.

G. Flooding

- 1) Existing stormwater flows running through the site must be managed and conveyed downstream safely, ensuring no adverse flooding impact on the adjoining property.
- 2) During the 1% AEP storm event, the depth of flooding on the road shall not exceed 0.2 meters, and the product of velocity and depth shall not exceed 0.4 square meters per second.

- 3) Both interim and ultimate stormwater management measures must meet the objectives and targets outlined in the WSA DCP (2022) and the “Technical Guidance for Achieving Wianamatta-South Creek Stormwater Management Targets” (DPE 2022). This is yet to be demonstrated.
- 4) In the ultimate design scenario, stormwater flows should be directed to the appropriate trunk or road drainage system.
- 5) Interim measures for managing site stormwater quality shall be provided and maintained at the site until Sydney Water establishes the regional basin network.
- 6) The proposed development should incorporate permanent on-site detention (OSD) basins to ensure that post-development stormwater flows do not exceed pre-development levels (Reference: SYD3120, Civil & Integrated Water Management Report, Revision: 4, 15 October 2025, ADP).
- 7) The afflux mapping presented in the Flood Impact and Risk Assessment report prepared by ADP (Revision B, dated 30 September 2025) indicates an increase in flood levels on the southern adjoining property. Accordingly, written owner’s consent from the property at 125 Badgerys Creek Road must be obtained to permit the identified flooding impact. This has not been provided and therefore consent can not be granted for the development pursuant to Clause 23 of the EP&A Regulations 2021.
- 8) As per Civil Engineering Plan Prepared by ADP (Revision A, 09 October 2025, stormwater is proposed to be discharged to the Innovation South, which is currently private property. As such, the owner’s consent for the property located at 125 Badgerys Creek Road must be obtained. This consent is required to permit construction works within the property and to allow the concentrated discharge of stormwater flows into the site.

This has not been provided and therefore consent cannot be granted for the development pursuant to Clause 23 of the EP&A Regulations 2021.

H. Natural Environment

Biodiversity Values

- 1) The site contains Critically Endangered Ecological Community, the Cumberland Plain Woodland (CPW).
- 2) Council spatial system, Geocortex, indicates that the site is biodiversity certified.
- 3) The subject site is located within 3 km of a wildlife buffer zone under the Aerotropolis DCP.

Biodiversity Conservation Act 2016

- 4) The entire site is Biodiversity Certified, the requirement for a site-by-site assessment of biodiversity impacts under state legislation is not applicable to the SSD, in accordance with

Section 8.4 of the *Biodiversity Conservation Act 2016*. Further assessment of impacts to biodiversity are therefore not considered warranted.

Aerotropolis DCP

- 5) All sites' activities, including pre-construction, during, and post construction phases, should be carried out in accordance with the relevant sections of the Aerotropolis Phase 2 Development Control Plan.
- 6) It is advised that the Wildlife Hazard Assessment (WHA) prepared by AVISURE consider the implications of the site being identified as a Parkland Priority Area under the DCP (Pages 50–51).
- 7) Revegetation species selection and density, as outlined in the Vegetation Management Plan prepared by Eco-logical, should align with the Aerotropolis Phase 2 Development Control Plan and the Wildlife Hazard Assessment prepared by AVISURE.

There appear to be inconsistencies between the VMP and the WHA, including the suggested planting list. It is recommended that consideration be given to the site being within the Parkland Priority Area when determining wildlife hazard-related issues.

- 8) It is recommended that the WHA prepared by AVISURE clearly distinguishes two different areas: one allocated for landscaping purposes only, and the second comprising natural areas, including the VMP area, prior to finalising recommendations for both areas.
- 9) It is recommended that the VMP considers measures proposed in the WHA.

Arboriculture Impact Assessment

- 10) It is recommended to retain tree sections containing hollows from trees identified for removal. Where feasible, tree trunks, hollows and large branches should be repurposed for habitat purposes within the VMP area.

Civil and Integrated Water Management Report and Civil Engineering Drawings Rock Repurposing Resulting from Earthworks

- 11) It is recommended that rocks with a diameter or width of approximately one metre or that are generated from earthworks be repurposed within natural areas where feasible. This may include, but is not limited to, applications such as habitat creation, surface runoff (including stormwater) and sediment erosion control works, embankment stabilisation, and access management. Where suitable, rocks may also be used within landscaping areas.

Stormwater Management

- 12) The Gung-Gung waterbody contains PCT 3975 Southern Lower Floodplain Freshwater Wetland (*Figure 8, Site Vegetation Mapping, Page 26 of the Environmental Impact Statement*). It is recommended to avoid direct discharge from Sediment Basin 2 (east and west) through temporary pipes. Instead, native vegetated swales should be created to convey excess water into the waterbody. Additional comments are provided in the table below.

Landscaping

- 13) It is recommended that the Landscape Plan excludes areas to be managed under the VMP.
- 14) It is recommended to incorporate raingardens in landscaping areas where feasible.
- 15) It is recommended to plant native species, ensuring alignment with the WHA and the Aerotropolis DCP plant list.

Vegetation Management Plan

- 16) It is recommended to include the maintenance of stormwater structures, including, but not limited to, biofiltration systems and stormwater discharge points adjacent to natural areas, as well as rubbish collection.
- 17) Permanent fencing specifications are outlined in the table below. It is recommended to fence off the VMP area, including an access gate suitable for small to medium-sized machinery for future use (*Page 7*).
- 18) The engagement of an ecologist for pre-clearance and earthworks supervision, as well as habitat enhancement (*Page 7*), should align with the recommendations outlined above in '*Rock Repurposing Resulting from Earthworks*' and the '*Arborist Impact Assessment*' suggestions.
- 19) Integrate weed eradication works and reporting with the Vegetation Management Plan when reporting.

Overview:

- 20) The recommendations are provided as observed in the supporting documents, highlighting additional and alternative measures to improve water quality along with desired sustainable outcomes. The recommendations are site plans and report specific.

Document	Reference point	Recommendation
<u>Civil and Integrated Water Management Report</u>	Page 18 Section 3.4.1.2. Figure 09 <i>Storm filter Cartridges Manufacturer Maintenance Schedule</i>	It is recommended that an annual brief report, including before and after images, be provided to the Manager Environment each year in perpetuity.
<u>Civil and Integrated Water Management Report</u>	Page 26 CE100 General Arrangement Plan C01, B01, C02 B03, B05	It is recommended to incorporate a basic biofiltration system at stormwater and overall surface runoff discharge points. The offline system should receive low to medium levels of runoff by managing ground levels and filtering flows through vegetative layers and sublayers before the treated water enters the waterway.

		The offline system can be connected through a rock-lined channel to the main flow path, allowing surcharge (high flows) to drain directly into the flowline to avoid damage to the biofiltration system. In addition, the C02 scour-based protection should be complemented with heavy-duty welded wire mesh panels to secure the structure. Coir logs should also be installed adjoining the perimeter of the structure to prevent future dislocation of rocks from the structure.
Civil Engineering Drawings	Page 3	
Civil and Integrated Water Management Report	Page 31 CE300 Soil and Water Management Plan	The direct release of runoff through temporary discharge pipes from construction sites during the construction phase, particularly from Proposed Sediment Basin 2 (minimum volume 285 m³ on the east and 200 m³ on the west), is likely to impact the water quality of the existing waterbody, the Gung-Gung Pond.
Civil Engineering Drawings	Page 8	It is recommended to construct swale channels of suitable width, structured with rectangular shaped flexible coir logs installed across the channel at approximately 5 m intervals, and revegetated with native sedges and rushes. These plantings can subsequently be incorporated into the riparian area. Where feasible, and where compatible with the final design, these temporary basins may be transformed into biofiltration systems towards the completion of the construction phase. It is recommended that the perimeter of Sediment Basin 2 should be installed with rectangular shaped flexible coir logs to provide additional reinforcement to the sediment fence line.
Biodiversity Assessment	Page 30 PO3	Quantify the number of hollow-bearing sections to be removed and, where feasible, reinstall them in a suitable location only suitable for small birds. Quantify the number of nest boxes for small birds to be installed and ensure they are monitored under the Vegetation Management Plan.

<u>Vegetation Management Plan</u>	Page 7 3.1.2 Permanent fencing	Installing a “1200mm high, top rail design, black powder coated galvanised pipe and black PVC chain wire fencing to the extent of 122.7 lineal meters including only 1000mm opening single gate to match fencing with welded pad bolt and locking chain”, is an effective strategy to prevent pets from entering sensitive natural areas. Attach sediment fence fabric to prevent weed incursion from adjoining areas. Bury 10cm of the fabric below ground during installation.
As above	Page 8 Section 4 Vegetation management works And Page 14 Table 5 Revegetation densities	Additional minimum, high-standard materials can be used for VMP include but not limited to rectangular <u>coir logs</u>, <u>geofabric (Bidim)</u>, <u>jute mesh</u>, <u>thick slitted jute matt</u>, <u>fastening pins</u> and <u>timber stakes</u>. Please note this is for reference only and material may be purchased from the preferred supplier/s of the VMP specialised contractor. Install rectangular-shaped coir log structures joined end-to-end along the length of the creek in a north–south direction on both sides where feasible. Installation should commence at the lower section closest to the creek line and progress upslope toward the upper section, with spacing of approximately 5 metres between structures. In areas of low resilience, brush cut or mow the ground, followed by the installation of slitted jute matting and revegetation where feasible. The recommended density guidelines for revegetation works are as follows: Upper Canopy: Plant 1 tree 5-8 square metres space. Lower Canopy: Plant 1 medium size tree per 5 square metres space. Shrubs: Plant 1 shrub per 3 square metres space Ground Cover: Plant 8 ground cover plants per 1 square metre space. Scrambler: Plant 1 scrambler / vine per 1 square metre space. <i>If there are inconsistencies, the Aerotropolis DCP planting density supersedes the recommended density.</i> This may vary for certain plant community types. This density ensures adequate spacing for healthy plant growth and supports effective habitat restoration by creating layered vegetation structure across the site. Ensure maintaining diversity in native plant species for revegetation planting. Slitted thick jute mat is preferred over mulching.

		Estimated number of visits and hours per year, performance measures and monitoring, and vegetation condition maps over the successive year.
As above	4.1.2 Manage Zone 2 Freshwater Wetland regeneration –	Direct discharge into the waterbody should be avoided. Final design from the Civil and Integrated Water Management Report and Civil Engineering Drawings, where the temporary pipes convey water directly from Basin 2 located on the west and east, should be consulted. It is recommended to create native revegetated swales from the basin to the Gung-Gung waterbody. The additional swales should be included in the scope of works. This should also include installing rectangular coir logs and revegetation works. Wetland perimeter works Install 3 m × 300 mm rectangular coir log structures joined end-to-end along/around the perimeter of the proposed detention basin, followed by dense planting of local native species consistent with the surrounding ecological community. Use slitted jute matting where feasible to suppress weeds and support native plant establishment. Wetland maintenance works It is recommended to remove aquatic and semi-aquatic weeds and rubbish from the waterbody.
As above	Page 27 Appendix B Recommended Channel Revegetation Species And Page 31 Appendix C Techniques and specifications	It is recommended to increase the number of tough grasses and cover a larger area with foliage to provide competition to weeds for revegetation works. This may include <i>Gahnia clarkei</i> in higher numbers, where suitable to the vegetation community. Remove <i>Acacia decurrens</i> and <i>Acacia paramattensis</i> due to its shorter longevity and the potential to become a fire hazard. Revegetation should occur during March or April, when summer ends and rainfall is more likely. Rabbit Exclusion Fencing The recommended permanent fencing covering the perimeter of the VMP, as outlined above, can be fitted with chicken wire to prevent rabbits from entering the revegetation zones.

I. Land Development Engineering

1. Earthworks

- No retaining walls or filling is permitted for this development which will impede, divert or concentrate stormwater runoff passing through the site.
- Earthworks and retaining walls must comply with Phase 2 Development Control Plan.
- Proposed fill material must comply with Phase 2 Development Control Plan, this is yet to be demonstrated.

2. General

- Existing services within the public footpath area, such as pits (eg Telecom, stormwater,) and poles, shall be shown on the drawings.
- Identify any existing easements, restrictions etc burdening the site in the area of any proposed works.

3. Stormwater

- Stormwater drainage for the site must be in accordance with Western Sydney Aerotropolis Development Control Plan – Phase 2 and the Western Sydney Aerotropolis Precinct Plan and Sydney Water requirements. Sections 2.3 and 2.5.1 of the WSA Phase 2 Development Control Plan must be followed. This has yet to be demonstrated.
- The on-site detention system must be within proposed lots and accessible from the street.
- A water quality treatment device shall be provided in accordance with Western Sydney Aerotropolis Development Control Plan – Phase 2.
- Concurrence/Approval from Sydney Water is required for stormwater management as they are the designated Regional Stormwater Authority for the Western Sydney Aerotropolis Precinct.
- Stormwater drainage for the site must be in accordance with Phase 2 Development Control Plan.
- The acquisition of drainage easements over downstream properties will be required where direct access to Council's drainage system, discharge of stormwater to a creek, or to the street network is not possible e.g. street kerb and gutter, piped system, open channel or watercourse (subject to demonstrating no adverse impacts). The easement to drain water must be registered prior to the issue of an operational consent.

4. Traffic & Access

- The application must demonstrate that access, car parking and manoeuvring details comply with AS2890 Parts 1, 2 & 6 and Phase 2 Development Control Plan. This has not been demonstrated.

J. Public Art

- 1) The current reference to public art within the context of the Recognise Country Response Template is incomplete and lacks reference to public art as defined by being undertaken by an artist.
- 2) Council recommends these items are addressed and integrated throughout the landscape and architectural designs.
- 3) Where further assistance is requested Council's public arts officer can provide support and advice to ensure required objectives and controls are met.

K. City Economy

- 1) The proposed mixed-use development near the future metro has potential to deliver positive economic outcomes for the area, including the creation of construction jobs and ongoing employment across hospitality, retail, health, fitness, childcare, and building management.
- 2) We encourage the proponent to clearly outline expected employment impacts, ensuring retail and supermarket uses complement each other, supporting local economic activity, contributing to the precinct activation throughout the day, and responding to infrastructure needs as the area grows.
- 3) The Economic impact statement should reflect the number of anticipated jobs during construction and ongoing within the precinct, along with the types of jobs that will be created to ensure that appropriate skilling/reskilling pathways are considered to support our local residents.
- 4) We advocate for at least 40% local jobs and encourages the proponent to reach out to Council's Economic Development and Strategy (ED&S) team to support and/or facilitate introductions to the leasing agent so support in investment attraction.
- 5) The ED&S team encourages consideration into a higher percentage of 3 bedroom units to better support growing families and promote a more balanced and sustainable community profile.
- 6) This proposal aligns with Council's Draft Visitor Economy Strategy, which seeks to leverage major infrastructure investment, expand accommodation supply, and support developments that stimulate tourism and economic growth. The strategy is focused on fostering a well-connected and vibrant city that attracts visitors for business, leisure, and events.
- 7) The proposed hotel development at Bradfield presents a strong opportunity to support Liverpool's growing role within Western Sydney's visitor economy. With the opening of Western Sydney International (Nancy Bird Walton) Airport, the region is set to become a key gateway for domestic and international travellers. Conveniently located accommodation will be essential to meeting the needs of visitors arriving by air.
- 8) The site's proximity to the new Metro connection between the Airport and Bradfield further enhances its suitability for hotel use. This direct, high capacity transport link will be particularly attractive for tourists flying into Western Sydney who require accessible, well connected accommodation close to the airport and emerging Bradfield precinct.

- 9) The NSW Government has identified a need for an additional 40,400 hotel rooms by 2035 to support tourism growth and economic development. Liverpool is well positioned to contribute to this target, and developments such as this play an important role in delivering the infrastructure required to attract visitors, generate employment, and support local businesses.
-