

Director Industry Assessments, Planning and Assessment  
Department of Planning, Industry and Environment  
Locked Bag 5022,  
**PARRAMATTA NSW 2124**

By email: [pamela.morales@dpie.nsw.gov.au](mailto:pamela.morales@dpie.nsw.gov.au)

Attention: Pamela Morales

**Re: EXHIBITION OF STATE SIGNIFICANT DEVELOPMENT APPLICATION SSD  
25452459**

Thank you for the opportunity to comment on the State Significant Development Application for the First Building – Bradfield City Centre - Advanced manufacturing research facility at 215 Badgerys Creek Road, Bringelly.

Council has reviewed the documentation on the NSW Department of Planning, Industry and Environment's (DPIE) website with respect to this application and provides comments in the attached appendix. Council notes that as the first application within the suburb of Bradfield, this development should be designed and developed to represent a very high benchmark in accordance with the Western Sydney Aerotropolis Plan, State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 and the exhibited Precinct Plan and Phase 2 Western Sydney Aerotropolis Development Control Plan.

If you have any questions please contact Peter Nelson, Principal Strategic Planner on 8711 7895.

Yours sincerely,



**Ian Stendara**  
Acting Coordinator Strategic Planning

## Appendix A Detailed Comments

### Service Provision

1. The application must demonstrate that a connection to the Sydney Water reticulated sewer system is available in accordance with Clause 51 of State Environmental Planning Policy (Western Sydney Aerotropolis) 2020. Council does not support the proposed Interim Operating Procedure (IOP) of trucking out sewerage, as noted on page 13 of the EIS as follows;

“Sydney Water is also the servicing authority for wastewater and sewage disposal. During the initial stages of the development, wastewater will be serviced through an interim operating pump station (IOP) in the temporary carpark area. The sewer is to be trucked out periodically until the construction of wastewater infrastructure for the future city development. Connection strategies will be coordinated in further detail with Sydney Water.”

Due to the lack of a fail-safe operation (and subsequent risks posed to human and environmental health), increased truck movements on the road network, and large costs associated with the disposal of effluent, Council does not support IOP for sewerage management. Council would encourage the proposal to dispose of sewerage by a piped system that connects to the Sydney Water reticulated system.

Should DPIE support the development with the use of an interim On-Site Sewage Management System (OSMS), the applicant will need to request an approval under section 68 of the *Local Government Act 1993* to construct, alter and operate a waste treatment device. Details of requirements in relation to a waste water treatment system are provided at **Appendix B**.

### Starting with Country

2. Earthworks - It appears that the extent of earthworks proposed as part of the civil works is excessive in some areas and is not in accordance with the “Starting With Country” requirements of the Precinct Plan and Draft Phase 2 DCP that seek to limit the amount of earthworks on the site. Council would request that the existing topography be retained to the greatest extent possible.

---

**Green Grid**

3. The proposal should demonstrate compliance with Clause 27 of State Environmental Planning Policy (Western Sydney Aerotropolis) 2020. In this regard, any areas of vegetation mapped as being of high biodiversity value should be retained.
4. It is requested that the proposal be supported by an Arboricultural report and associated tree survey prepared by an AQF Level 5 Qualified Arborist. The report and survey should identify all significant trees on the site, identify trees for retention, removal and replacement. The arboricultural report should provide detailed recommendations in relation to the provision of replacement tree planting as part of the proposal. It is also recommended that mitigation measures are included in the EIS to minimise harm to fauna, including protocols for tree felling.
5. The current design documentation does not provide any details regarding the proposed landscape scheme (including tree species, vegetation palette, public domain treatments, soil volumes / depth, paving treatments, etc.). Developing a more detailed landscape documentation is recommended for the proposed development for further assessment.
6. Urban heat Island effect – Tree Canopy provision for shading of roads, footpaths, car parking areas and building facades is to be demonstrated with appropriate native/locally endemic (or locally endangered) canopy and under storey planting.
7. The civil plans should provide sufficient detail of verge/tree pit soil volumes, that will allow for the proposed canopy planting to reach a height and spread as detailed in Drawing 0103. In this regard Drawing 0103 generally details trees with a mature canopy spread of 13.2m.
8. The plans should provide sufficient detail in relation to species type, mature height and spread and verge/tree pit/planter treatment.
9. A vegetation management plan is requested detailing ongoing management required to ensure compliance with the Wildlife Buffer Zone requirement of the Phase 2 DCP.
10. Sufficient information is to be provided with the civil plans to detail how underground services are protected by root barriers or are located away from street tree planting. To ensure vegetation growth is not constrained, barriers should be provided around services rather than around vegetated areas.

---

**Blue Grid**

11. Riparian Area treatment and stormwater disposal – It appears from the Hydroline spatial data that the site is traversed from west to east by multiple streams from Strahler Order 1 to Strahler Order 4 that drain the site into Thompsons Creek to the east. The proposal does not identify riparian areas within the site and does not identify how the existing natural creek system (and associated riparian areas and site topography) are to be utilised to drain the site. The EIS notes on page 78 under the tabulated heading 3.2.4 Riparian Corridors and Farm Dams that:

“Dams are located on the site as well as riparian corridors. The proposal will not impact on the health of these waterways. The proposal will retain, restore and regenerate the land to ensure that waterways health in continuously improved.”

No supporting information is provided within the accompanying civil plans or architectural plans as to how the riparian areas are proposed to be improved within the site. It is therefore requested that further information be provided in relation to these streams and the improvement of riparian areas.

12. The site strategies identify ‘Led by landscape and water’ as a key principle, however, the analysis does not identify the larger network of water / landscape being envisaged for the area. The proposed water feature / creek line within the site needs to align with the larger creek system existing around the area. This should be demonstrated in the drawings through plans / illustrations.
13. The site for the proposed development is not affected by flooding from the adjoining Thompson Creek. However, the proposed development is affected by overland flooding. An appropriate stormwater drainage system is to be designed in accordance with the Flood Impact Assessment by Advisian dated 15 November 2021.
14. The treatment and improvement of the blue grid (riparian areas) on the site should be undertaken in accordance with the DCP and draft Precinct plan. The riparian area treatment and ongoing management is to be ascertained in accordance with the requirements of the stormwater authority.

**Traffic, Parking and Pedestrian access**

15. The design report identifies ‘Central Loop West’ as a primary access point for the site, however, the public domain / landscape scheme does not address the primary entrance adequately. Further articulation of the forecourt along Central Loop West should be considered to create a more welcoming entrance to the site.

The proposed built form and landscaping should address the northern street frontage and articulate the corner of this frontage / Central Loop West to provide the required legibility in the long run.

- 
16. Details of pedestrian linkages through the site along existing riparian desire lines from west to east and along Thompsons Creek from North to South should be provided. Additionally, the urban design principles for the development does not include consideration for active transport as part of the overall connectivity principles. The development should consider how the proposal may form part of a link in the overall pedestrian / active transport network being proposed for the Aerotropolis Core and Bradfield.
  17. Access road and other associated transport infrastructure should be provided in accordance with the Bradfield City Centre Master Plan, Transport Management Accessibility Plan (TMAP) and staged delivery of the identified transport infrastructure network.
  18. Detailed design plans of the proposed access road, roundabout, driveway and the layout of the parking in accordance with Australian Standards A.S. 2890, including gradient, turn paths, sight distances, aisle widths, signs and markings are to be submitted for review by Council.
  19. The applicant is to provide a construction traffic management plan for all demolition and construction activities including detailed vehicle routes, number of trucks, hours of operation, access arrangements, traffic control measures and impacts on the existing and proposed road network.

#### **Built form**

20. Built Form - The proposed built form for the AMRF First Building incorporates a number of innovative building solutions as part of the design; which is supported. Additional detail is requested in relation to the following:
  - The architectural drawings do not provide adequate details regarding the public domain. It is requested that a more detailed plan for the public domain is provided.
  - The architectural plans for the building do not provide adequate details for solar amenity / sunshade analysis being undertaken for the building. Since the built form proposes significant glazing on the northern and western facades, it is recommended that a detail solar analysis / heat gain study is undertaken for the site.

The proposed materiality of the built form is quite high level / generic. Providing further details regarding the proposed materials and finishes is requested.

21. Council are members of the Southern Strength Agile Manufacturing Network (SSAMN) which is a key stakeholder in the development of the facility. It is recommended therefore that this organisation be involved in current and future consultations regarding the design and operation of the AMRF.

**Amenity and Safety**

22. Noise and Vibration – a quantitative noise and vibration impact assessment undertaken by a suitably qualified acoustic consultant in accordance with the relevant Environment Protection Authority guidelines and Australian Standards is requested. The assessment must:
- detail construction and operational noise and vibration impacts (including cumulative impacts, provision of operational noise contours and sleep disturbance assessment) on nearby sensitive receivers and structures; and
  - outline the proposed management and mitigation measures that would be implemented.
23. Air Quality and Odour – a quantitative assessment of the potential air quality, dust and odour impacts of the development (construction and operation) on surrounding landowners, businesses and sensitive receptors, in accordance with relevant Environment Protection Authority guidelines, including details of proposed mitigation, management and monitoring measures is requested. Potential odour impacts were not quantitatively assessed by the consultant (Todoroski Air Sciences Pty Ltd). For this reason, it is unclear whether the consultant's report sufficiently addresses the SEARS which require a quantitative assessment of the potential air quality, dust and odour impacts of the development (construction and operation) on surrounding landowners, businesses and sensitive receptors.
24. Contamination – When reviewing the available information, it is believed that the Applicant has not submitted sufficient information to enable the consent authority to give approval to carry out the Project. Based upon the available information, it is currently unclear whether the land is contaminated, is currently suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out. It is also currently unknown whether the land requires remediation to be made suitable for the proposed development.

To address the SEARs and determine the need for remediation, it is believed that a detailed appraisal of the sites' history comprising a review of all available information is required. In addition, intrusive site investigations in the form of a Stage 2 Detailed Site Investigation shall be carried out in accordance with applicable guidelines made or approved by the NSW EPA under the *Contaminated Land Management Act 1997* for inclusion in the EIS to determine the type, extent and level of contamination within the development site and identify if remediation is required to address *SEPP No. 55-Remediation of Land*.

---

25. Waste Management - Suitable waste storage facilities should be provided as part of the proposal. The garbage/waste storage areas shall be clearly identified on the site plans and be located within the proposed building. The designated garbage/waste storage areas shall comply with the following requirements:

The rooms should be fully enclosed and provided with a concrete floor, and with concrete or cement rendered walls coved to the floor;

- Provided with a hose cock for hosing the garbage bin bay and a sewerage drainage point in or adjacent to the bin storage area. The drainage point should have a fine grade drain cover sufficient to prevent coarse pollutants from entering the sewer. If the hose cock is located inside the bin storage bay, it is not to protrude into the space indicated for the placement of bins;
- The room shall have a floor waste grate which is to consist of a removable basket within a fixed basket arrestor and is to comply with Sydney Water requirements; and
- The room must include a tight-fitting, self-closing door and mechanical ventilation.

## **Appendix B On-site Sewage Management System**

In accordance with Section 68 of the Local Government Act 1993, approval is required to install, construct or alter a waste treatment device and operate a system of sewage management at the premises.

If an OSMS is proposed, the EIS will need to include a wastewater report prepared by a suitably qualified and experienced environmental or wastewater consultant.

The wastewater report is required to identify the site area available for development and determine if on-site effluent disposal is feasible when considering potential risks to public health and the environment. The report would need to consider all potential wastewater flows (proposed and existing flows) and include the following minimum information:

### Plan

The report shall include a plan to scale, showing the location of:

- The sewage management facility proposed to be installed or constructed on the premises; and
- Any related effluent application areas; and
- Any buildings or facilities existing on, and any environmentally sensitive areas of, any land located within 100 metres of the sewage management facility or related effluent application areas; and
- Any related drainage lines or pipework (whether natural or constructed).

### Specifications

The report shall include full specifications of the sewage management facility proposed to be installed or constructed at the premises.

### Site assessment

The report shall include details of the climate, geology, hydrogeology, topography, soil composition and vegetation of any related effluent disposal areas together with an assessment of the site in the light of those details.



---

Statement

The report shall include a statement of:

- the number of persons or probable number of persons occupying the premises, and
- such other factors as are relevant to the capacity of the proposed sewage management facility.

Operation and maintenance

The report shall include details of:

- The operation and maintenance requirements for the proposed sewage management facility, and
- The proposed operation, maintenance and servicing arrangements intended to meet those requirements, and
- The action to be taken in the event of a breakdown in, or other interference with, its operation.

Standards and guidelines

The report shall demonstrate that a system can be installed in accordance with the requirements of the following documents:

- Liverpool Development Control Plan Part 1, Section 15 – On-site Sewage Management Systems (OSMS);
- Local Government (General) Regulation 2021;
- Australian/New Zealand Standard 1547:2012, On-site Domestic Wastewater Management, or any updated standard which supersedes AS1547:2012;
- Sydney Catchment Authority 2012, Designing and Installing On-site Wastewater Systems;
- NSW Health 2001, Septic Tank and Collection Well Accreditation Guideline; and
- Department of Local Government 1998, On-site Sewage Management for Single Households.

The detailed wastewater report shall be prepared by an Environmental Scientist or Engineer with a minimum of a bachelor's degree qualification and extensive industry experience within an on-site sewage management context.

---

Section 4.15 of Liverpool City Council's 'On-Site Sewage Management Standard' adopted 28th April 2021 also contains additional information relevant to commercial onsite sewage management systems.

Proposals relying on on-site sewage management will not be approved where a reticulated sewerage service is available within 75m of any property boundary.