

Scoping Report

*Lots 208, 209 & 210 Automated
Distribution Centre*

January 2026

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Report Number	FINAL – 23 January 2026

Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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1 Introduction

1 Introduction

This Scoping Report has been prepared by Urbis (**the Applicant**) on behalf of an e-retailer client. They are an established e-retailer seeking to better support its customers by harnessing leading edge technology to drive supply chain efficiencies through the development of a new facility in the Aerotropolis. This Scoping Report seeks Project-Specific Secretary’s Environmental Assessment Requirements (**SEARs**) to guide the preparation of an Environmental Impact Statement (**EIS**) that will accompany a State Significant Development Application (**SSDA**) at 475 Badgerys Creek Road, Bradfield (**the site**).

This request relates to the proposed development of a warehouse or distribution facility (as defined), referred to throughout this report as an automated distribution centre (**ADC**). As the proposal has an estimated development cost (**EDC**) of more than \$30 million, the proposed development is State Significant Development (**SSD**) pursuant to Clause 29 of Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**).

During 2026, Western Sydney International Airport is planned to open. Catalytic infrastructure including the N-S Metro and the M12 motorway will be operating to support the efficient functioning of the Airport. Developments such as that proposed at the site will undoubtedly leverage off this significant infrastructure investment and showcase exactly what long terms plans for the Aerotropolis are intended to achieve.

Ingham Property Group (**IPG**) is the current owner of the site and sale of the site is currently being negotiated. A Master Plan for the site was approved by the Department of Planning, Housing and Infrastructure (**DPHI**) on 11 July 2025 in accordance with Section 4.41 of the *State Environmental Planning Policy (Precincts Western Parkland City) 2021* (**WPC SEPP**), which sought amendments to the WPC SEPP, Aerotropolis Precinct Plan and DCP. Development of the IPG site will provide critical employment opportunities and services to the Aerotropolis and the broader Western Parkland City.

The purpose of this report is to:

- Describe the nexus between the IPG Master Plan, and the proposed ADC, specifically in terms of design and impact assessment considerations.
- Describe the project in simple terms.
- Analyse the feasible alternatives considered and identify the alternatives that will be investigated further in the EIS.
- Indicate early community views on the project and identify what engagement will be carried out during the preparation of the EIS.
- Identify the key matters requiring further assessment in the EIS and the proposed approach to assessing each of these matters.

1.1 Applicant Details

The applicant details for the proposed development are listed in Table 1.

Table 1 Applicant Details

Element	Details
Postal Address	Angel Place Level 8, 123 Pitt Street Sydney NSW 2000 Australia (Gadigal Country)
ACN	105 256 228
Nominated Contact	Michael Beale Associate Director

Element	Details
	mbeale@urbis.com.au (02) 8233 7617

1.2 Project Overview

Table 2 provides an overview of the proposed development.

Table 2 Site and Project Overview

Matter	Description
The site	The land to which this Scoping Report relates is referred to as 475 Badgerys Creek Road, Bradfield, which has direct interface with the Western Sydney International Airport (WSI). It is noted that the proposed ADC will be located on Proposed Lots 208, 209 and 210 within the 475 Badgerys Creek Road landholding (Super Lot 102) For the purpose of this Scoping Report, reference to 'the site' will relate primarily to the area within the broader lot proposed to be developed for the ADC, unless otherwise specified.
Country	Dharug
Street Address	475 Badgerys Creek Road, Bradfield.
Legal Description	Part Lot 102 and Lot 105 in DP 1316278
Site Area	The broader IPG Master Plan site comprises approximately 184 hectares. The site proposed to accommodate the ADC is approximately 171,682m ² .
LGA	Liverpool Local Government Area (LGA)
Existing development	The site was formerly used for intensive poultry farming operated by current landowner Ingham Property Group (IPG) and is characterised by a series of now demolished sheds and ancillary structures. There is also an internal road network within the site which had connected the sheds and ancillary structures dispersed across the site. The site is currently cleared of any structure, vacant and undergoing estate earthworks in accordance with the approved Master Plan (addressed under separate CDC applications).
The Project	
Project objectives	It is the proposed client's intent to construct and operate a new ADC within the western portion of the IPG site (super lot 102). The ADC will be a distribution centre for e-retail goods storage and distribution direct to offsite third-party sortation service providers.

A map of the IPG site in its regional setting is provided at Figure 1. The location of the proposed development within the IPG Master Plan is shown in Figure 2.

Figure 2 IPG Master Plan



2 Project Background

2 Project Background

2.1 Master Plan Background

The *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* (WPC SEPP) is the principle Environmental Planning Instrument (**EPI**) for the site as well as the entire Western Sydney Aerotropolis. The SEPP is supported by 4 other key planning documents:

- Western Sydney Aerotropolis Precinct Plan (**Precinct Plan**)
- Western Sydney Aerotropolis Development Control Plan (**DCP**)
- Western Sydney Aerotropolis Special Infrastructure Contribution (**SIC**)
- Liverpool s7.12 Contributions Plan (**CP**)

The SEPP prescribes the following key development controls applying to development on the site:

- Zoning: The site is zoned ENT Enterprise
- Precinct Plan prescribes a height limit of 52.5m from existing ground level
- OLS is 125.5m measures from reduced level (**RL**)

Clause 4.39 of the WPC SEPP requires that:

“Development must be consistent with the Precinct Plan. Where development proposed is inconsistent with the Precinct Plan, the inconsistency is to be minor, and justified as being demonstrably unreasonable or unnecessary, and there are sufficient environmental planning grounds to justify the inconsistency.”

Importantly, it is noted that a Master Plan for the IPG site was approved by DPHI in July 2025 in accordance with Section 4.41 of the WPC SEPP, which sought amendments to the WPC SEPP, Aerotropolis Precinct Plan and DCP.

As per the Master Plan requirements, DPHI’s appointed Technical Assurance Panel (**TAP**) coordinated the initial drafting of the Master Plan. The Master Plan was proposed as an alternative development approval pathway for the IPG site and has been prepared in accordance with section 4.41 of the *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* (**WPC SEPP**).

Key elements of IPG’s Master Plan as it relates to the proposal site is as follows:

- Re-alignment of the Eastern Ring Road (**ERR**) and Bradfield Metro Link Road (**BMLR**): The approved realignments do not impact on the road hierarchy of both roads, or any road connecting into these roads, and will serve the same purposes identified in the Precinct Plan. The realignment is an opportunity to align with property boundaries, where feasible, for a better place and design outcome, as well as more feasible lots for development and subdivision. Associated amendments were approved to the land use structure plan, including adjustments to the land use layout, open space network and stormwater/riparian network in response to the new road layout.
- Amendment to the permissible building height and OLS: The IPG Master Plan sought to vary the existing height controls contained in the Aerotropolis Precinct Plan, proposing a maximum building height for potential high-bay and multi-storey warehousing of up to approximately 52.5m as detailed in the Master Plan. There are two parcels of land within the IPG Master Plan identified as being suitable for high-bay warehousing, referred to as the ‘western parcel’ and the ‘eastern parcel’. The proposal site is located in the western parcel.

The Master Plan sought multiple amendments to the statutory planning context which currently applies to the site, including:

- Western Parkland City SEPP

- Western Sydney Aerotropolis Precinct Plan May 2023
- Western Sydney Aerotropolis Development Control Plan Phase 2 (Phase 2 DCP)

The proposed ADC development will respond to the provisions of the IPG Master Plan and updated Precinct Plan, and do not propose any changes to the approved super lot layouts, maximum height of buildings or overall road network.

The approved IPG Master Plan includes a Complying Development Code that aims to streamline the delivery of future development at the site through. The IPG Complying Development Code includes development standards for the following specified works that are relevant to the proposed development:

- Subdivision Code
- Earthworks Code
- Retaining Walls Code
- Public Domain and Landscaping Code
- Local Roads and Infrastructure Code
- Local Stormwater Works Code
- Other Subdivision Code
- Tree and Vegetation Management Code
- Temporary Public Roads, Construction and Haul Roads and Ancillary Works

Approval for enabling works required to facilitate development across the IPG Master Plan site (including on the application site) is currently being secured separately by IPG pursuant to the relevant Complying Development Codes.

The scope of works included within the CDC application to facilitate development at the proposal site comprises the following:

- Approval for the subdivision of the IPG site pursuant to the Subdivision Code. Accordingly, the proposed development as detailed within this Scoping Report and subject to a future SSDA does not include any subdivision works.
- Access to the proposed development will be provided via a new local road as envisaged by the IPG Master Plan. Approval for the new local road will be secured via CDC (pursuant to the Local Roads and Infrastructure Code) and does not form part of the scope of works subject to the future SSDA as described within this Scoping Report. IPG will be responsible for the delivery of the new local road.
- Bulk earthworks will be undertaken by IPG to create a flat 'pad' on the site that is 'ready-made' for the future ADC development the subject of the SSDA. IPG is responsible for securing approval and delivering the bulk earthworks required to facilitate development on the site including the creation of temporary stormwater detention basins. A complying development certificate will be obtained for these bulk earthworks. Accordingly, only minor cut and fill works are anticipated to be required to facilitate the construction of the proposed warehouse development.
- Utilities infrastructure required to service the proposed development and the remainder of the IPG Master Plan will also be delivered separately by IPG. Utilities delivered in the initial stage (Stage 1) of the Master Plan will be extended to service the proposed development. This includes a Zone Substation in the southern part of the Master Plan. Only minor on-lot utilities connection works are therefore required as part of the development proposed by the Applicant as described within this Scoping Report and subject to the future SSDA.
- Tree removal will be undertaken by IPG alongside the subdivision works to ensure that the site is 'ready-made' for future development. This does not form part of the proposed scope of works to be undertaken by the Applicant.

Additional approvals for enabling works at the IPG Master Plan site include a DA (DA424/2024) currently under assessment by Liverpool City Council for the construction of a roundabout and associated engineering infrastructure on Badgerys Creek Road.

A separate Sydney Water REF under Part 5 of the EP&A Act is also being prepared to address the works required to convert the temporary sediment basins (addressed under CDC) into regional stormwater detention basins in accordance with Sydney Water requirements.

It is anticipated that these approvals will be in place well in advance of the SSDA works commencing, to enable the effective sequencing of lead in and on-lot infrastructure needed to support the proposed development.

2.2 Project Rationale

The rationale for the project including need and site selection is described in Table 3.

Table 3 Project Rationale

Project Detail	Commentary
Project need	The Sydney ADC project will be transformational for the e-retailer's aspirations to better support its customers. It not only will harness leading edge technology to drive supply chain efficiencies but also stands to be a landmark investment by a globally recognised brand in Western Sydney and specifically the Aerotropolis.
Site selection	During 2026, Western Sydney International Airport is planned to open. Catalytic infrastructure including the N-S Metro and the M12 motorway will be operating to support the efficient functioning of the Airport. Developments such as that proposed at the site will undoubtedly leverage off this significant infrastructure investment and showcase exactly what long terms plans for the Aerotropolis are intended to achieve.
Strategies to avoid, minimise or offset impacts	The proposed ADC will be assessed with specific consideration to the assessment benchmarks established under the IPG Master Plan. Where strategies to avoid, minimise or offset impacts remain relevant to the ADC, these will be utilised. In the unlikely event that project specific strategies are required, these will be presented and justified as part of the specialist assessments to be provided with the future EIS.
Development required for the project but would be subject to a separate assessment.	Power, sewer, potable water, telecommunications, stormwater infrastructure will be required by the project. Approval for the Master Plan site-wide utilities will be secured by IPG via a CDC. As part of the ADC project, consent will be sought to finalise tap-in applications/connections as required. The ADC will gain all vehicular access from Road 3, which is also subject to a separate assessment process to be undertaken by IPG prior to or concurrently with the ADC project. Should for whatever reason complete certainty on the timing and responsibility of such infrastructure not be able to be provided at the time of the EIS, these elements will be included as part of the works for which consent is sought to ensure it can be demonstrated that the site is considered suitable for the proposal.

3

Strategic Context

3 Strategic Context

3.1 Key Features of Site and Surrounds

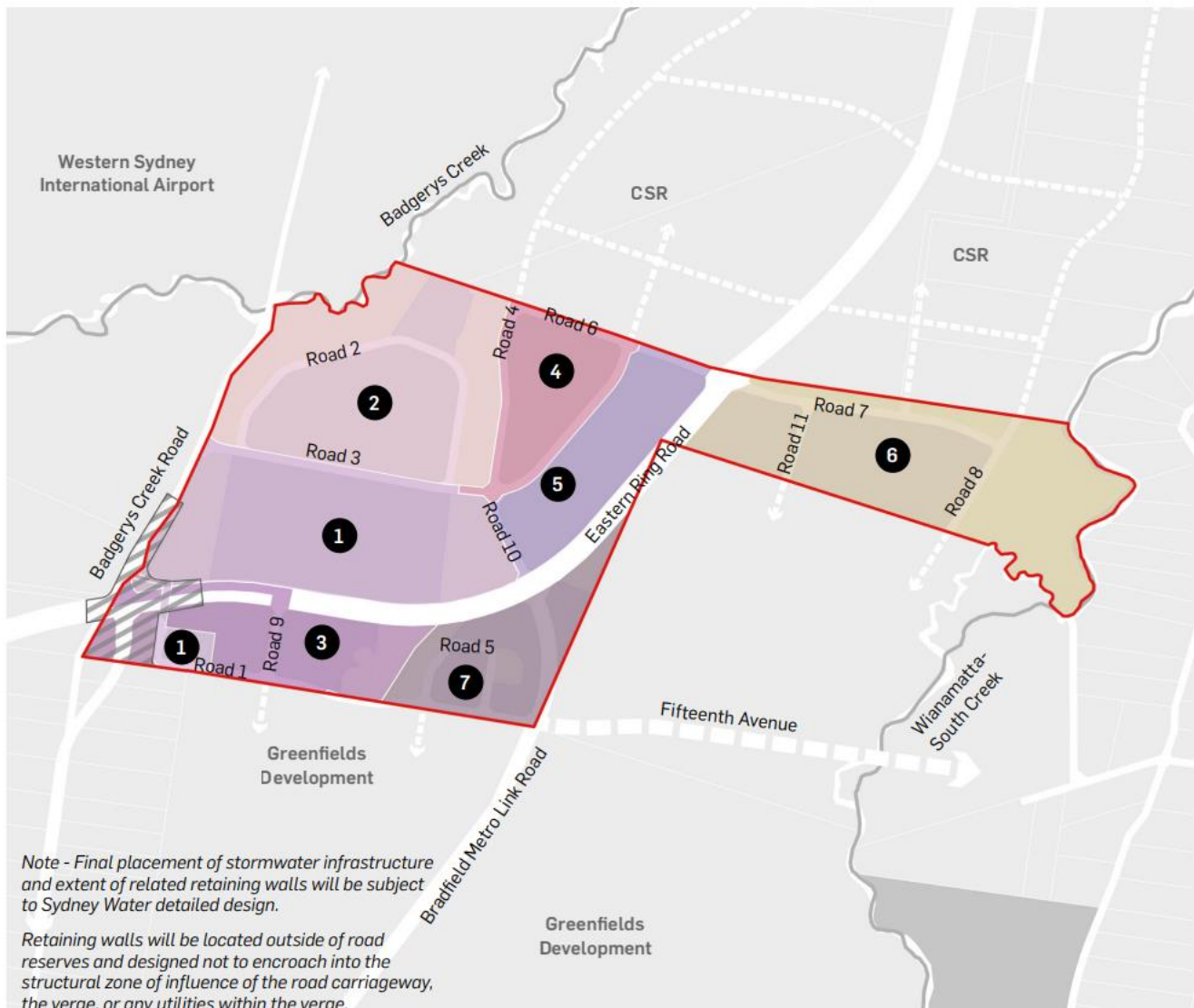
The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in Table 4.

Table 4 Key Features of Site and Locality

Descriptor	Site Detail
Land Configuration	The site proposed for the ADC is relatively flat. More broadly, the larger IPG parcel of land slopes down towards the creeks at the northwestern and northeastern boundaries.
Adjacent land uses	475 Badgerys Creek Road (the IPG Master Plan site) is situated between the Western Sydney International Airport (to the northwest), and the future Bradfield City Centre (to the south). The site is bound by a large landholding to the north owned by Goodman, and a similarly large landholding to the south referred to as the GDC Site. The proposed site is situated within the Western Parcel of the IPG Master Plan land. It will be bound to the south by Road 3 and Road 2 to the north.
Site Access	The proposed site footprint is reliant on the road network proposed by the IPG Master Plan. No roads are currently constructed on the site. The current Master Planning layout for the site proposes that the site will be accessed from proposed 'Road 3'.
Vegetation	The site is predominantly grassland and is clear of vegetation reflective of its historic use for agricultural purposes.
Hydrology	The parcel of land nominated for the site is not impacted by overland flow / flooding. Stormwater falling onto the site will be required to be appropriately treated before draining into adjacent stormwater infrastructure.
Aboriginal Heritage	The site is identified as having potential areas of Aboriginal cultural sensitivity (moderate) across the periphery as identified by the Western Sydney Aerotropolis Precinct Plan mapping.
European Heritage	The site does not contain any heritage items and is not located in a heritage conservation area.
Bushfire	The broader IPG Master Plan site is currently mapped as being bushfire prone land, however the Master Plan has been designed to consider the suitability of the layout with respect to bushfire risk. This has considered the Aim and Objectives of PBP, Section 2.3 Strategic Planning, and specifically addressed the requirements of Chapter 4 – Strategic Planning and Chapter 8 – Other Development. Overall, the Master Plan provides a well-considered design that has responded to the bushfire risk affecting the site and provides for the protection of life and the minimisation of impact on property, whilst having due regard to development potential, site characteristics and protection of the environment. All proposed lots within the Master Plan are capable of meeting a minimum standard of BAL-29 construction for the indicated building envelopes on each

Descriptor	Site Detail
	proposed Lot, and the most suitable approach to facilitate the use of Exempt & Complying Codes should this be pursued for on-lot developments.
Biodiversity	The site is bio-certified under the Southwest Growth Centre Bio certification scheme.
Contamination	Forming part of the IPG Master Plan, a Detailed Site Investigation (DSI) was prepared to investigate the presence of soil and contamination. A detailed review of this DSI is required by a qualified consultant to confirm contamination risks across the site. It is to be noted that the report does conclude the IPG site is suitable for proposed commercial and industrial land use subject to recommendations.
Services and Utilities	The site is currently un-serviced, however is within the vicinity of existing water, electrical and telecommunication services. Utilities infrastructure required to service the proposed development and the remainder of the IPG Master Plan will be delivered separately by IPG. Approval for the Master Plan site-wide utilities will be secured by IPG via CDC. Utilities delivered in the initial stage (Stage 1) of the Master Plan will be extended to service the proposed development. This includes a Zone Substation in the southern part of the Master Plan. Only minor on-lot utilities connection works are therefore required as part of the development proposed by the Applicant as described within this Scoping Report and subject to the future SSDA. As part of the ADC development, consent will be sought to finalise tap-in applications/connections as required.

Figure 3 IPG Staging Plan



Source: Urbis, 2026

3.2 Project Justification

Table 5 provides a strategic justification of the proposed development against relevant strategic planning documents.

Table 5 Strategic Context

Plan	Comment
Greater Sydney Region Plan – A Metropolis of Three Cities	The Greater Sydney Region Plan (Regional Plan) is the overarching strategic plan that seeks to shape future development for the Sydney metropolitan area over the next 40 years. Under the Region Plan, the site is located within the Western Parkland District, which forms as part of the Western Parkland City. The site is located within the Aerotropolis Core Precinct directly adjacent to the Western Sydney International Airport (WSI) and Bradfield City which is identified to become the CBD of the Western Parkland City. The corridor will contribute to a strong trade, freight and logistic, advanced manufacturing, health, education and science economy.

Plan	Comment
	The project will act as a catalyst for the Aerotropolis Core, delivering a significant economic investment as intended for the area under the Regional Plan
Western City District Plan	The Western City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The site forms part of the Western Economic Corridor which GSRP identifies will attract globally significant freight and logistics uses, in a highly strategic location. The project will deliver this vision, enabling a large-scale warehouse or distribution facility in a strategic location
Western Sydney Aerotropolis Plan	The Western Sydney Aerotropolis Plan ('the WSA Plan') outlines the planning framework for the Aerotropolis. It sets a clear vision to guide its future development, with objectives underpinning the realisation of the key priorities outlined within the Region and District Plans, i.e. Productivity, Sustainability, Infrastructure and Collaboration and Liveability. Key elements of the vision and the Structure Plan include a landscape-led approach to establishing the structural elements, including: ▪ Implementing the 'Connecting with Country' framework to ensure Country is cared for during the design and development process. ▪ Creating a global gateway with fast and reliable transport and digital infrastructure to attract the best and brightest to invest and work in the Aerotropolis. ▪ Designing a cool, green new city with great places that are connected by walking, cycling, interaction and collaboration, with blue and green infrastructure to maintain biodiversity and deliver high amenity spaces. ▪ Evolving land uses and urban forms to allow for transition to more intensive and higher-order technology, advanced manufacturing and creative industry uses over the longer term. ▪ Retaining a green, biodiverse landscape with regeneration of natural landscapes to reduce impacts as the Aerotropolis develops over time. The principles outlined above have been embedded in the IPG Master Plan, and will therefore form important elements of the proposal ADC given it is being designed to comply with the Master Plan
Liverpool Local Strategic Planning Statement	The Liverpool Local Strategic Planning Statement (LSPS) is a 20-year plan and land use vision that seeks to appropriately develop jobs, homes, and infrastructure in conjunction with the identified priorities of the Liverpool community. Planning Priority 12 under the LSPS, seeks to deliver industrial and employment lands to meet Liverpool's future needs, delivering more jobs and economic stimulation to Western Sydney.

3.3 Cumulative Impacts with Future Projects

The site is located within the Aerotropolis, Liverpool LGA. The site is bound by a large landholding to the north being developed by Goodman, and a similarly large landholding to the south referred to as the Greenfields Development Co (**GDC**) site. The frameworks established under the Master Plan for the IPG land, has had to have specific regard to the cumulative impact of these nearby sites and associated developments. The

potential cumulative impacts of the project will be addressed in the EIS in accordance with the DPHI Assessing Cumulative Impacts guidelines, and will have specific regard for any current, and/or potential future Master Plans in the adjoining catchment including:

- ALDI Automated Distribution Centre (SSD-76913969)
- Project Maverick – Internal Works (SSD-97688711)
- 225-245 Martin Road, Bradfield Bulk Earthworks (SSD-97711727)
- DHL Logistics Facility, Badgerys Creek (North) SSD-70817958
- Building 2 Advanced Manufacturing Research Facility 215 Badgerys Creek Road, Bradfield (SSD-58591961)
- Altis Warehousing Estate 2289-2309, 2311 Elizabeth Drive, Luddenham (SSD-48438209)
- Elizabeth Enterprise Precinct – Stage 1 1669-1723 Elizabeth Drive, Badgerys Creek (SSD-19618251)
- First Building Bradfield City Centre (SSD-25452459)
- 230 Martin Road Industrial Development (SSD-65529236)
- Boral's Badgerys Creek Industrial Area 235 Martin Road, Badgerys Creek (SSD-60644466)
- 50 Martin Road, Badgerys Creek (DA-723/2022)
- Western Sydney Airport Business Park The Northern Road, Luddenham (SSD-64409468)
- 40 The Retreat Bringelly (SSD-65729209)
- Luddenham Resource Recovery Facility 275 Adams Road, Luddenham (SSD-10446)
- Central Park, Bradfield City Centre (SSD-65490715)
- WSI Airport (2014-7391)
- Western Sydney International Airport
- Bradfield City Centre
- Aerotropolis Metro Station
- M12 Motorway (SSI-9364)
- Western Sydney Freight Line
- Sydney Metro – Western Sydney Airport (SSI-10051)
- Burrah Park 1953-2109 Elizabeth Drive (SSD-70316465)
- Badgerys Creek Industrial Park 85 Martin Road (SSD-74191717)
- GDC Master Plan

4 The Project

4 The Project

This section outlines the key features of the proposed development, including the project area, the conceptual physical layout and design (including likely mitigation measures), the main land use activities and the likely timing for delivery of the project.

It also includes a high-level of feasible alternatives which were considering having regard to the project objectives outlined in Section 1.2 of this report, including the consequences of not carrying out the development

4.1 Proposed Development

Table 6 provides an overview of the key features of the proposed development.

Table 6 Proposed Development

Key Element	Proposal
Defined use	Warehouse or distribution facility
Site area (approx.)	171,682m ²
Building height	28.5m
GFA	201,850m ²
Landscaped area	25,750m ² (15% of site area)
Car parking	913

The proposed warehouse or distribution facility will comprise goods sorting at ground floor level with robotics operations and goods storage at upper levels. The proposal is consistent with the definition of high-bay warehousing as set out within the Master Plan. The Master Plan defines 'High-Bay Warehousing' as "warehousing and distribution premises that have a height between 24m – 52.5m" and "examples of emerging trends in new warehouse and logistics topologies for industries which require taller warehouses to process fast-moving goods and advanced technologies".

4.2 Feasible Alternatives

Section 192 of the Environmental Planning and Assessment Regulation 2021 (the Regulation) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development. The Applicant identified three project alternatives which were considered in respect to the identified need for the proposed concept plan and warehouses. Each of these options is listed and discussed in Table 7.

Table 7 Analysis of Feasible Alternatives

Option	Comment
Option 1 – Consequences of not carrying out the development.	The consequences of not carrying out the development would undermine the strategic objectives of The Aerotropolis Precinct, relevant Metropolitan and District Plan objectives and significant public infrastructure investment by Federal, State and local government to support the Aerotropolis Core.
Option 2 – Alternate scale of development	The site could be developed for a range of other, smaller footprint developments which would be permissible within the ENT Enterprise Zone under the WPC SEPP. However, this is not considered an optimal outcome, as this would result in a less efficient use of a site which has been specifically

Option	Comment
	intended to facilitate large scale warehouse logistics hubs such as the one proposed
Option 3 – Proposed Development	The proposed ADC is considered the most appropriate and feasible option for the site for these reasons: ▪ During 2026, Western Sydney International Airport is planned to open. Catalytic infrastructure including the N-S Metro and the M12 motorway will be operating to support the efficient functioning of the Airport. Developments such as this proposal at Bradfield will undoubtedly leverage off this significant infrastructure investment and potentially showcase exactly what long terms plans for the Aerotropolis are intended to achieve. ▪ The proposal has been wholly designed into the current IPG Master Plan. That is, a critical design element of the IPG Master Plan has been ensuring the proposal is capable of being facilitated on the site, and that all impacts can be reasonably managed or mitigated where required

5 **Statutory Context**

5 Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the project including:

- Environmental Planning and Assessment Act 1979 (**EP&A Act**)
- Environmental Planning Assessment Regulation 2021 (**the Regulations**)
- State Environmental Planning Policy (Planning Systems) 2021 (**Planning Systems SEPP**)
- State Environmental Planning Policy (Transport and Infrastructure) 2021 (**T&I SEPP**)
- State Environmental Planning Policy (Resilience and Hazards) 2021 (**R&H SEPP**)
- State Environmental Planning Policy (Biodiversity and Conservation) 2021 (**B&C SEPP**)
- State Environmental Planning Policy (Sustainable Buildings) 2022 (**SB SEPP**)
- State Environmental Planning Policy (Precincts—Western Parkland City) 2021 (**WPC SEPP**)
- Western Sydney Aerotropolis Precinct Plan
- Western Sydney Aerotropolis Development Control Plan

Consideration is also required to be given to the following matters:

- The IPG Master Plan approval, inclusive of associated WPC SEPP and Precinct Plan amendments.

5.1 Statutory Requirements

Table 8 categories and summarises the relevant requirements in accordance with the DPHI State Significant Development Guidelines. Each of these matters will be addressed in further detail within the future EIS.

Table 8 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
Power to grant approval	Schedule 1 Clause 29 of the Planning Systems notes that development on land within the Western Sydney Aerotropolis is State significant when the estimated development cost exceeds \$30M. The EDC exceeds the threshold of \$30M and the proposed development is therefore appropriately classified as SSD.
Permissibility	The site is zoned ENT Enterprise, in accordance with the WPC SEPP. Warehouse or distribution centres are wholly permitted with consent in the ENT Zone
Other approvals (General)	The following Acts were considered but by virtue of the application being SSD and the nature of the proposal, no further approval is required under the following: ▪ NSW National Parks & Wildlife Act 1974 ▪ NSW Heritage Act 1977 ▪ NSW Roads Act 1973 ▪ NSW Water Management Act 2000 ▪ NSW Rural Fire Service Act 1997 ▪ NSW Protection of the Environment Operations Act 1997. No requirements for other approvals have been identified at this stage, however, will be further investigated as part of the EIS package.

5.2 Pre-Conditions

Table 9 outlines the pre-conditions to exercising the power to grant consent which are relevant to the project.

Table 9 Pre-Conditions

Pre-conditions to granting consent	Comment
Section 4.24 of the EP& A Act – Concept Development Consent	Determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposal for the development of the site. A concept consent does not apply to the site.
Section 35 of the EP&A Regulations – Additional requirements for development applications in certain areas of Sydney	Under s.35 a person must not apply to a consent authority for consent to carry out development in certain areas of Sydney unless the Minister has declared the land, or land that includes the land, to be a release area in accordance with that Plan, clause 7. This section is not relevant to this proposal.
Section 66 of the EP&A Regulations – Contributions plans for certain development	Under s66 a development must not be determined by the consent authority unless a contributions plan has been approved for the land. A contribution is not required if the applicant has entered into a planning agreement with a planning authority under Part 7 of the Act for the matters that may be the subject of a contributions plan. Discussion on the requirements for contributions as part of the ADC will form part of the EIS package
State Environmental Planning Policy (Precincts – Western Parkland City) 2021	Chapter 4 of the WPC SEPP is the principal environmental planning instrument that sets out land use zones and development controls for the site. The WPC SEPP sets out the following pre-conditions to granting development consent to projects in the Aerotropolis: ▪ Cl.4.17 Aircraft noise – noise sensitive development ▪ Cl. 4.18 Building wind shear and turbulence ▪ Cl. 4.19 Wildlife hazards ▪ Cl. 4.21 Lighting ▪ Cl. 4.22 Airspace operations ▪ Cl. 4.23A Operation of certain air transport facilities ▪ Cl 4.24 Flood planning ▪ Cl 4.25 Preservation of trees and vegetation in the Environment and Recreation Zone and Cumberland Plain ▪ Cl 4.25A Clearing of native vegetation. ▪ Cl 4.26 Heritage conservation ▪ Cl 4.27 Transport corridors ▪ Cl 4.28B Aboriginal cultural guidelines ▪ Cl 4.31 Design review panels ▪ Cl 4.33 Consideration of design excellence ▪ Cl 4.39 Development must be consistent with Precinct Plan ▪ Cl 4.49 Public utility infrastructure

Pre-conditions to granting consent	Comment
	Consideration will be given to the proposal's compliance with these controls. Where controls are proposed to be amended, this will be further explained and justified in the subsequent EIS.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Clause 2.122 requires the consent authority to refer development for a warehouse or distribution facility with a site area of more than 8,000sqm with access to any road to Transport for NSW. Accordingly, it is acknowledged that TfNSW will be referred the future EIS
State Environmental Planning Policy (Resilience and Hazards) 2021	A consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation – for the purpose for which the development is proposed to be carried out.
State Environmental Planning Policy (Sustainable Buildings) 2022	Chapter 3 will likely apply to the development. In deciding whether to grant development consent to large commercial development, the consent authority must consider whether the development minimises the use of on-site fossil fuels, as part of the goal of achieving net zero emissions in New South Wales by 2050. The proposal will consider this provision in the detailed design as part of the EIS. Additionally, a NABERS Embodied Emissions Material Form to disclose the amount of embodied emissions attributable to the development will be submitted with the future EIS.

5.3 Mandatory Considerations

Table 10 outlines the mandatory considerations in the assessment of the SSDA.

Table 10 Mandatory Considerations

Statutory Reference	Mandatory Consideration
Consideration under the EP&A Act and Regulations	
Section 1.3	The relevant objects of the EP&A Act will be addressed in the EIS
Section 4.15 (1)(a)(i) Relevant environmental planning instrument	All relevant EPIs will be addressed in the EIS, these include: - WPC SEPP - Resilience & Hazards SEPP 2021 – Hazardous and Offensive Development - Resilience & Hazards SEPP 2021 – Remediation of Land - Planning Systems SEPP - Transport & Infrastructure SEPP - Industry & Employment SEPP - Sustainable Buildings SEPP
Section 4.15 (1)(a)(ii) Relevant draft environmental planning instrument	While the Master Plan may not be a draft EIS, an assessment of the Master Plan considerations will be undertaken as part of the EIS.
Section 4.15 (1)(a)(iii) Relevant development control plan	Despite Clause 2.10 of the Planning Systems SEPP stating that DCPs do not apply to SSDAs, the Western Sydney Aerotropolis Development

Statutory Reference	Mandatory Consideration
	Control Plan (as proposed to be amended under the Master Plan) will be considered in the EIS.
Section 4.15 (1)(a)(iiia) any planning agreement or draft planning agreement	N/A
Section 4.15 (1)(a)(iv) relevant matters prescribed by the Regulations.	Reference will be made in the EIS to the contributions framework which applies to the site, along with the proposal's consistency with the Western Sydney Precinct Plan as proposed to be amended.
Section 4.15(1)(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	The likely impacts of the development have been identified in Section 7 of this scoping report including those matters requiring further assessment in the EIS. It is noted that the consideration and assessment of such impacts will be wholly informed by the findings of reporting prepared and lodged with the IPG Master Plan.
Section 4.15(1)(c) The suitability of the site for the development	An assessment of the suitability of the site will be undertaken within the EIS including whether the proposal fits within the locality and whether the site attributes are conducive to the proposed development.
Section 4.15(1)(d) Any submissions made in accordance with the Act or regulations	Early engagement will be undertaken with the community and agencies to ensure that their views are appropriately considered and detailed in the EIS. A detailed response to any submissions will be provided following lodgement and public exhibition of the EIS.
Section 4.15(1)(2) The Public Interest	The public interest of the project will be fully detailed and addressed within the EIS.
Section 4.24 Status of concept development applications and consents	The proposal is not a Concept Application, nor is lodged in accordance with one.
Mandatory relevant considerations under EPIs	
WPC SEPP	The WPC SEPP is the principal environmental planning instrument that that sets out land use zones and development controls for the site. An assessment of the relevant provisions of the WPC SEPP, including the provisions as amended under the IPG Master Plan, will be provided in the EIS.
State Environmental Planning Policy (Resilience and Hazards) 2021	Section 4.6 – Contamination and remediation to be considered in determining development application. A detailed site investigation will be submitted as part of the SSDA.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.122 – Traffic-generating development. Referral of the project will be required to Transport for NSW as traffic generating development.
State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP)	All signage will be required to consider the Schedule 5 criteria under the I&E SEPP, unless adequate provisions have been accounted for in the IPG Master Plan. Further details on proposed signage and the relevant assessment framework will be captured in the EIS.

Statutory Reference	Mandatory Consideration
Considerations under other legislation	
Biodiversity Conservation Act 2016 Part 7 and Part 8 (2) (BCA)	The Sydney Region Growth Centres Biodiversity Certification was approved on 11 December 2007. The biodiversity certification of the Growth Centres was given effect via transitional arrangements under the NSW Biodiversity Conservation Act 2016. Development on biodiversity certified land does not require further biodiversity assessment. Additionally, the land is biodiversity certified.
Federal Airports Act 1996	An aviation safeguarding assessment will be prepared and submitted within the EIS. This assessment will consider Part 12 – Protection of airspace around airports including activities that result in intrusions into prescribed airspace and controlled activities that may require approval under section 182 of the Airports Act.
Roads Act 1993	Section 138 regulates works and structures in, on or over a public road including requirements for concurrence from TfNSW.
Precinct Plan	
Western Sydney Aerotropolis Precinct Plan	The Western Sydney Aerotropolis Precinct Plan will be addressed in detail within the EIS. This will also include assessment against any Precinct Plan amendments resulting from the IPG Master Planning process.
Development Control Plan	
The Western Sydney Aerotropolis Development Control Plan	Clause 2.10(1) of the Planning Systems SEPP provides that the provisions of Development Control Plans do not apply to SSD. There is no requirement for assessment of the project against the Western Sydney Aerotropolis DCP, however, an assessment against the DCP will be provided as part of the future EIS.
Master Plan Approval	
IPG Master Plan	An assessment against the relevant provisions of the IPG Master Plan will be included within the EIS.
Concept Approval	N/A.

6 Community Engagement

6 Community Engagement

The following sections of the report describe the engagement activities that have already been carried out for the project, and the engagement to be carried out during the preparation of the EIS.

6.1 Engagement Carried Out

The proposed development reflects discussions with the following key agencies as detailed in Table 11.

Table 11 Agency Engagement

Agency	Date	Comments/Feedback
DPHI	19 December 2025	An online introductory meeting was held with representatives from the following organisations: ▪ Urbis ▪ E-Retailer The objective of the meeting was to discuss the proposed development while flagging the relationship with the Master Plan. While no formal feedback was provided, the following was noted: ▪ Further discussions regarding the DQS will be required with DPHI ▪ DPHI will confirm whether an Environmental Protection Licence is required.

All comments received through this process have been reflected in the Scoping Report and Architectural Plans. Once the SEARs are received, the Applicant will proceed with the formal consultation process as part of preparing the EIS, as detailed in Section 5.2.

6.2 Future Engagement to be carried out by the Applicant

The IPG Master Plan was informed by a co-design process with the TAP which was undertaken in accordance with the Master Plan Guidelines. The TAP was made up of the following stakeholders:

- Technical Assurance Panel independent chair (Stephen Murray) and TAP members including the representatives from the:
 - Department of Planning, Housing and Infrastructure
 - Transport for NSW
 - Western Parkland City Authority
 - Sydney Water
 - Liverpool City Council
 - Independent Urban Designer

In addition to the TAP process, consultation was undertaken as part of the IPG Master Plan through the detailed Connecting with Country process completed via Yerrabingin, the engaged Indigenous Consultant on the project. Consultation was undertaken with the following stakeholders:

- Traditional Owners – Dharug Women
- Deerubbin Local Aboriginal Land Council

The local First Nations Community's input has been physically applied to the design and will therefore be applied to the proposed development the subject of this Scoping Report.

In addition to this, a thorough community engagement strategy was undertaken as part of the IPG Master Plan, with the outcomes of the consultation forming key considerations in the final design. Consultation was undertaken through the following methods:

- Near neighbour letterbox drop.
- Western Sydney Aerotropolis Community Consultative Committee (CCC) – the newsletter was issued to CCC members via the Independent Community Commissioner. The newsletter was sent on 29 June 2023 to all members of the CC. CCC members were also encouraged to distribute the newsletter further through their network, including on local Facebook pages.
- The community newsletter was sent out on Thursday 29 June 2023 to 568 residents and businesses located nearby the proposed site. The community newsletter outlined key features of the project and invited feedback. It included details of the project email and phone number managed by Urbis Engagement to answer questions and collect feedback.

This is important to note, as the proposed development the subject of this Scoping Report has been wholly anticipated as part of the IPG Master Plan process, therefore should align with the expectations of the stakeholders listed above.

While further stakeholder consultation will be undertaken as part of the future EIS, the requirements placed on this development should be commensurate with the work to date, and relevant to the proposed development, so as to not undermine the objective of consultation.

An Engagement Outcomes Report will be provided with the EIS.

7 **Proposed Assessment of Impacts**

7 Proposed Assessment of Impacts

This section identifies the key impacts which will be further investigated and assessed within the EIS, including the proposed approach to assessing each of these matters. It also identifies the matters addressed in the scoping phase that are unlikely to result in significant impacts and do not warrant further consideration in the EIS.

Importantly, it is noted throughout this section that several key impact considerations will be assessed with regard to the findings of the IPG Master Plan reporting, noting the extensive nature of this reporting wholly envisages the intended ADC development. Several 'benchmarks' for future assessments will be established by the Master Plan, thus a concurrent consideration of such assessments will be fundamental when considering any future EIS

7.1 Matters Requiring Further Assessment in the EIS

Table 12 outlines the relevant matters and impacts which will be addressed in detail within the EIS. It outlines the matters and impacts of particular concern to the community and other stakeholders.

Table 12 Matters requiring assessment in the EIS

Matter	Consideration
Design Excellence	The IPG Master Plan includes a Design Quality Strategy (DQS) to ensure design quality is achieved across the precinct. The DQS, which applies to all on-lot development and associated landscaping across the whole IPG site, was developed in collaboration with DPHI and the Technical Assurance Panel as part of the Master Planning process, in accordance with objectives from the Government Architect NSW's (GANSW) 'Better Placed, Green Places and Connecting with Country Frameworks'. The DQS is underpinned by a series of design quality principles which capture high-bay warehousing, including land use, urban built form and architecture. The DQS adopts a principle-based approach to design quality and a hierarchy approach to the verification and review of the design quality for future development across the Master Plan area. Each design principle contains associated design elements (including a design statement, objectives, and outcomes). In terms of design quality assessment and review process, the DQS adopts a Quality Review Process based on location (either Enterprise and Industry or Commercial) and bulk or scale of the proposal. In accordance with the IPG Master Plan DQS, the proposed development is considered a 'medium-scale' project as the gross footprint exceeds 10,000 sqm and the site is not identified as a landmark site. Accordingly, a detailed peer review of the proposed development will be undertaken by an independent architect prior to the lodgement of the SSDA to verify that the proposal complies with the DQS. The review will form part of the lodgement package. This is consistent with the approach that has been undertaken for the ALDI ADC (SSD-76913969).
Connecting with Country	The proposed development will be designed with regard to the IPG Master Plan DQS, which has been developed with specific regard to the Connection to Country Framework prepared by GANSW, along with the Recognise Country Guidelines for development in the Aerotropolis. The EIS and Architectural Design Report will clearly demonstrate how the

Matter	Consideration
	frameworks have been implemented and reflected in the design of the proposed development.
Urban Design and Landscaping	The SSDA will include an urban design and landscaping report to ensure the proposal is of a high quality and landscape led design, aligning with the DQS referred to above. The project will provide a high-quality landscaped outcome on the site that will maximise tree canopies to optimise shade and reduce urban heat island effects
Amenity	The EIS will address key environmental amenity matters. Key technical studies to inform the EIS will include (if required) noise and vibration impact assessment, visual impact assessment, air quality impact assessment and assessments relating to operational specifics.
Noise and Vibration	The proposed development is expected to have acoustic and vibration impacts as well as cumulative impacts in relation to surrounding large-scale developments. A Noise and Vibration Impact Assessment (NVIA), prepared with specific regard to the Acoustic Assessment that has been prepared by EMM Consulting as part of the IPG Master Plan, will accompany the EIS. Mitigation, management, and monitoring measures will be documented and implemented over the demolition, construction, and operation of the site.
Visual	Visual impacts of the proposed development will be assessed, noting the extent of development anticipated under the IPG Master Plan. The Visual Impact Assessment (VIA) will include an assessment at suitable intervals from construction to assess the impact of the development prior to and following the establishment of landscaping.
Air Quality	An air quality analysis and assessment will be undertaken to ensure suitable air quality throughout the construction and operational phases of the proposed development. The assessment will have specific regard to the SLR Air Quality Report prepared as part of the IPG Master Plan. Strategies to manage likely impacts such as dust emissions and suppression during construction will be further explored in the EIS.
Access and Transport	A Traffic Impact Assessment (TIA) will be prepared to assess key traffic impacts arising from the proposed development in the context of the approved IPG Master Plan. The TIA will be prepared with regard to and in the context of the anticipated traffic growth put forward in Ason's Transport Management and Accessibility Plan, and Options Assessment Report, prepared as part of the IPG Master Plan Existing and estimated future traffic conditions, parking, and access as well as the impact on surrounding road capacity and pedestrian/cycling routes are all key features will be analysed. The EIS will also detail the access to the proposed development from a new local road to be delivered separately pursuant to the IPG Master Plan. The new local road does not form part of the scope of works for which development consent will be sought as part of the SSDA. The applicant acknowledges the need to provide certainty regarding the site's ability to connect to established road network and will provide further clarity on this matter as part of the EIS.

Matter	Consideration
	A construction traffic management plan and details of freight management for the proposed development will also be prepared as part of the SSDA. Additionally, a Green Travel Plan will be submitted with the EIS. The Green Travel Plan will detail the active transport measures to be implemented to encourage reduced reliance on private car use to the site.
Water and Flooding	Analysis of the site's water and stormwater conditions will be included in the civil infrastructure report and plans. Water quality and quantity will be assessed for the proposed development utilising the MUSIC modelling. An integrated water management strategy that assesses potential surface and groundwater impacts associated with the development in accordance with relevant water quality guidelines and the Department of Climate Change, Energy, the Environment and Water – Water Group (DCCEEW–Water) Groundwater Toolkit will be prepared. The EIS will include details of how the proposed stormwater drainage system will connect to Sydney Water's regional stormwater system, including details of any interim solution, consistent with the Department's 'Technical guidance for achieving Wianamatta–South Creek stormwater management targets' (2022). This will include information regarding the interim arrangements for the management of stormwater until such time the regional system is delivered. A Soil and Water Management Plan (SWMP) will be provided alongside the completion of an Erosion and Sediment Control Plan. These will help inform further site analysis in the EIS regarding any irrigation risks. The approved IPG Master Plan has been informed by flood risk analysis. The proposed development is not located within the 1 in 100 AEP Flood Extent Area. Accordingly, further assessment will be limited to a review of the proposed development and confirmation that it complies with the relevant flood planning levels.
Earthworks	Bulk earthworks will be undertaken separately by IPG under a CDC and do not form part of the proposed works. The bulk earthworks will establish a flat 'pad' on the site upon which the proposed building will be constructed. Notwithstanding, it is anticipated that minor earthworks will be undertaken as part of the SSDA. Civil plans will therefore be prepared to demonstrate the proposed earthworks and manage any associated impacts.
Geotechnical	A Geotechnical Report will provide an assessment of the ground conditions of the site and any risks associated with ground stability or proposed excavation. The report will detail the findings from desktop review of the site and borehole testing where necessary. The report will recommend appropriate temporary and permanent site support and retention measures if required. The Geotechnical Report will also assist to determine any required engineering and earthworks to achieve the proposed development outcome.
Waste	The proposed development is expected to generate waste during the construction and operation phases. A Waste Management Plan (WMP)

Matter	Consideration
	will be prepared to determine the extent of management required and will be in accordance with waste regulatory frameworks and legislation
Building Code of Australia	A BCA report will be prepared for the development and will present the findings of an assessment of the proposed building against the Performance Requirements of the Deemed to Satisfy provisions of the Building Code of Australia. The assessment will also identify whether the development will rely on an Alternate Solution based assessment
Access	An access report will be prepared for the development to ensure that disabled access can be provided in accordance with Disability Discrimination Act 1992. The access report will demonstrate how access for all users is addressed through the development.
Ecologically Sustainable Development / Net Zero / Embodied Emissions.	An Ecologically Sustainable Development (ESD) Report will be prepared to provide an assessment of the proposed developments sustainability credentials. The ESD report will provide an assessment of the building design and demonstrate ways in which the development will achieve best practice and compliance with sustainability requirements. It is anticipated that the proposed development will include ancillary office floorspace that exceeds 1,000 square metres GFA. Accordingly, this part of the proposed development comprises 'large commercial development' pursuant to Chapter 3 of State Environmental Planning Policy (Sustainable Buildings) 2022 and will trigger the requirement for a Net Zero Statement. An Embodied Emissions Form and NABERS Commitment to Rate will also be prepared as part of the proposed development.
Social Impact	A Social Impact Assessment was prepared as part of the IPG Master Plan to consider the social impacts resulting from the redevelopment of the whole IPG site. Notwithstanding, an assessment of the social impacts of the proposed development against the baseline social impacts noted in the Master Plan reporting will be undertaken to inform the SSDA.
Community Engagement	An Engagement Outcomes Report will be provided. The Report will outline the engagement carried out to date, the outcomes of that engagement and how it has informed the proposed development. The report will provide evidence of a transparent and collaborative engagement process and will outline: ▪ details of how issues raised, and feedback provided during engagement activities have been considered and responded to in the development ▪ details of the proposed approach to future community and stakeholder engagement based on the results of consultation.
Aboriginal Heritage	An Aboriginal Cultural Heritage Assessment was completed by Ecological to inform the IPG Master Plan. An archaeological assessment was undertaken to document the archaeological values within the site and to identify any known or unrecorded Aboriginal site. Notwithstanding, an assessment confirming the site's suitability from an Aboriginal Cultural Heritage perspective will be provided as part of the

Matter	Consideration
	EIS. This will detail continued engagement undertaken by IPG with Registered Aboriginal Parties; updated Aboriginal Heritage Information Management System searches; and further discussion on the results of the previous archaeological survey and the reassessment of the previously recorded Potential Archaeological Deposits as relevant to the proposed development. Additionally, a completed Recognise Country Guideline Template will be prepared.
Services and Utilities	Power, sewer, potable water, telecommunications, stormwater and road infrastructure for the IPG site will be delivered via a CDC. Notwithstanding, as part of the proposed development subject to this scoping report, the Applicant will seek consent to finalise tap-in applications/connections as required. The Applicant acknowledges the need to provide certainty around the timing, responsibility, and funding of utilities and road infrastructure at the time of submitting the EIS, having regard to the need for the site to be considered suitable for the proposal. Any interim measures will also be detailed as part of the EIS.
Land Use Conflict Risk Assessment	A Land Use Conflict Risk Assessment will be prepared in accordance with relevant guidance prepared by the Department of Primary Industry. It will include an assessment of biosecurity risks associated with the proposed development and any required mitigation measures.
Aviation Assessment	Given the site's proximity to the new Western Sydney Airport, an Aviation Impact Assessment will be prepared. This will include: ▪ An assessment of potential impacts of the proposed development on Airport operations ▪ A wildlife hazard assessment, wildlife management plan and a lighting plan ▪ Consideration of related matters in the Aviation Safeguarding Guidelines –Western Sydney Aerotropolis and surrounding areas, Western Parkland City SEPP and the National Airports Safeguarding Framework
Bushfire Risk Assessment	A Bushfire Risk Assessment has been prepared to inform and support the IPG Master Plan. Notwithstanding, a report will be prepared as part of the SSDA that confirms that proposed development complies with the requirements of Planning for Bush Fire Protection 2019 and the measures recommended in the IPG Bushfire Assessment Report.
Hazards and Risks	It's expected that storage of dangerous goods will be required. Therefore, a Preliminary Hazard Analysis will be prepared as part of the SSDA.

7.2 Matters Requiring No Further Assessment in the EIS

This section of the report identifies the following matters that do not require further assessment in the EIS. Each of these matters was considered within the scoping phase but considered unlikely to result in significant impacts that warrant further assessment.

- **Access – port/rail facilities:** The site is not within proximity to a port or approved rail facility. Future consideration will be given to the site strategic context, including future rail corridors within a separate section of the future EIS.
- **Air – gas:** The proposed future operation does not emit any gases that warrant assessment such as greenhouse gas.
- **Amenity – odour:** The proposed future operation will not cause any anticipated odorous issues, and thereby does not warrant further assessment beyond the standard Air Quality assessment required by the SEARs.
- **Land contamination:** A detailed site investigation and asbestos management plan were prepared as part of the IPG Master Plan. These reports demonstrate that the site is suitable for the proposed development from a land contamination perspective subject to the implementation of the measures identified. The Asbestos Management Plan also includes a site unexpected finds protocol, which details the steps required to deal with contamination, specifically asbestos, should it be encountered during construction.
- If necessary, a detailed and site-specific asbestos management plan can be prepared as part of a future Construction Environmental Management Plan, the requirement for which will be secured by a planning condition.
- **Biodiversity:** The Sydney Region Growth Centres Biodiversity Certification was approved on 11 December 2007. The biodiversity certification of the Growth Centres was given effect via transitional arrangements under the NSW Biodiversity Conservation Act 2016. Development on biodiversity certified land does not require further biodiversity assessment. This applies to the land the subject of the proposed development. A BDAR waiver assessment will be provided with the SSDA.

Additionally, the IPG Master Plan was informed by a Biodiversity Assessment Report and Biodiversity Management Plan. The proposed development will have regard to any relevant measures set out within the Biodiversity Management Plan. Consideration will also be given as part of the SSDA to the proposal's compliance with the relevant biodiversity related controls set out within the Precinct Plan, DCP and IPG Master Plan.

- **Economic Impact Assessment:** The proposed development will deliver significant economic benefits during the construction and operation phases. Notwithstanding, the proposal is anticipated by both local and State planning instruments and supported by regional planning frameworks. Accordingly, an Economic Impact Assessment is not required.
- **Hazard and Risks – Coastal hazards, land movement:** The site is not in a coastal area. The existing and proposed operations are not classified as hazardous or offensive development.
- **Heritage (European):** The site is not listed as a heritage item, nor is it located within a conservation area. The closest heritage items are located within 1 kilometre and listed on the State Heritage Register and Schedule 2 of the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 and will not be impacted by proposed development.
- **Riparian Assessment:** A Riparian Assessment Report was prepared by EcoLogical Australia (ELA) as part of the IPG Master Plan. The proposed development will rely on the findings and recommendations put forward as part of the Master Plan

8 Conclusion

8 Conclusion

This Scoping Report has outlined preliminary information regarding the proposed development ADC on land in the Aerotropolis. The report has outlined preliminary information regarding the site and proposal, identified the relevant strategic and statutory context, summarised the approach to engagement with stakeholders and, identified the scale and nature of the impacts of the project.

As outlined in Section 4, the Proposal is declared State Significant Development under Schedule 1, Clause 29 of the Planning Systems SEPP. We trust that the information detailed in this report is sufficient to enable the Secretary to issue SEARs for the preparation of an EIS.

Disclaimer

This report is dated 23 January 2026 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of TMX Transform (**Instructing Party**) for the purpose of Scoping Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.



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