



Airlink Estate - 40 Eaton Road Luddenham Request for Project Specific SEARS

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Client FTD Holdings

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Executive Summary

FTD Holdings PTY Ltd (FTD Holdings) is requesting Project-specific Secretary's Environmental Assessment Requirements (SEARs) to develop 42,443 m² of warehouses and offices across 5 buildings, comprising 38,073 m² of warehousing and 4,380 m² of ancillary office space, in the Agribusiness zone in the Western Sydney Aerotropolis.

The proposal is generally compliant with the planning controls; however, the proposal will include a request to relocation of the proposed Collector Road to align the road with the site's southern border so it does not sever the site.

The Environmental Impact will address all the issues stipulated in the SEARs; however, it is noted that the following issues will require particular focus:

- Recognising Country;
- Consultation with Transport for NSW regarding the proposed amendments to the road network and intersections;
- Noise assessment, including the potential impact on Luddenham village and the residential receptor to the south;
- Consultation with the Commonwealth regarding lighting, as the proposal is within the light control zone;
- Consultation with Sydney Water regarding stormwater management; and
- Coordination and liaison with adjoining owners regarding servicing and road access.

40 Eaton Road is ideally located to meet the objectives of the Aerotropolis Plan, as it provides an opportunity to establish agribusiness in a warehouse and logistics development that is flexible in design, offering 42,443m² of warehouse floor area across various floor space sizes and combinations on a 96,700m² site. The inclusion of climate control provides opportunities for a range of agribusiness and automated uses consistent with the vision of the Western Sydney Aerotropolis.

Contents

Executive Summary.....	2
Introduction	4
The Site.....	4
Proposed Development	5
Strategic Planning Context	7
Draft Sydney Plan.....	7
Greater Sydney Region Plan – A Metropolis of Three Cities.....	7
Western City District Plan	8
Western Sydney Aerotropolis	8
Statutory Planning Context	10
State Significant Development.....	10
State Environmental Planning Policy (Precincts – Western Parkland City) 2021.....	12
Land Use Permissibility	12
Planning Controls	13
Western Sydney Aerotropolis Precinct Plan	14
Western Sydney Aerotropolis Phase 2 DCP	21
Engagement	21
Other Environmental Issues.....	22
Conclusion.....	23
References.....	23
Table of Figures	
<u>Figure 1 – Regional Context</u>	4
<u>Figure 2 – Development Masterplan</u>	5
<u>Figure 3 – Infrastructure Delivery Phasing</u>	9
<u>Figure 4 - Zoning</u>	12
Appendices	
Survey	
Survey – Aerial Photograph	
Masterplan of development.	

Introduction

FTD Holdings proposes developing a warehouse and distribution centre at 40 Eaton Road, Luddenham, within the Western Sydney Aerotropolis agribusiness precinct.

A team of consultants has prepared this report on behalf of FTD Holdings to request that the Department of Planning, Housing, and Infrastructure (**DPHI**) issue Project-specific SEARs in accordance with Section 173 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation).

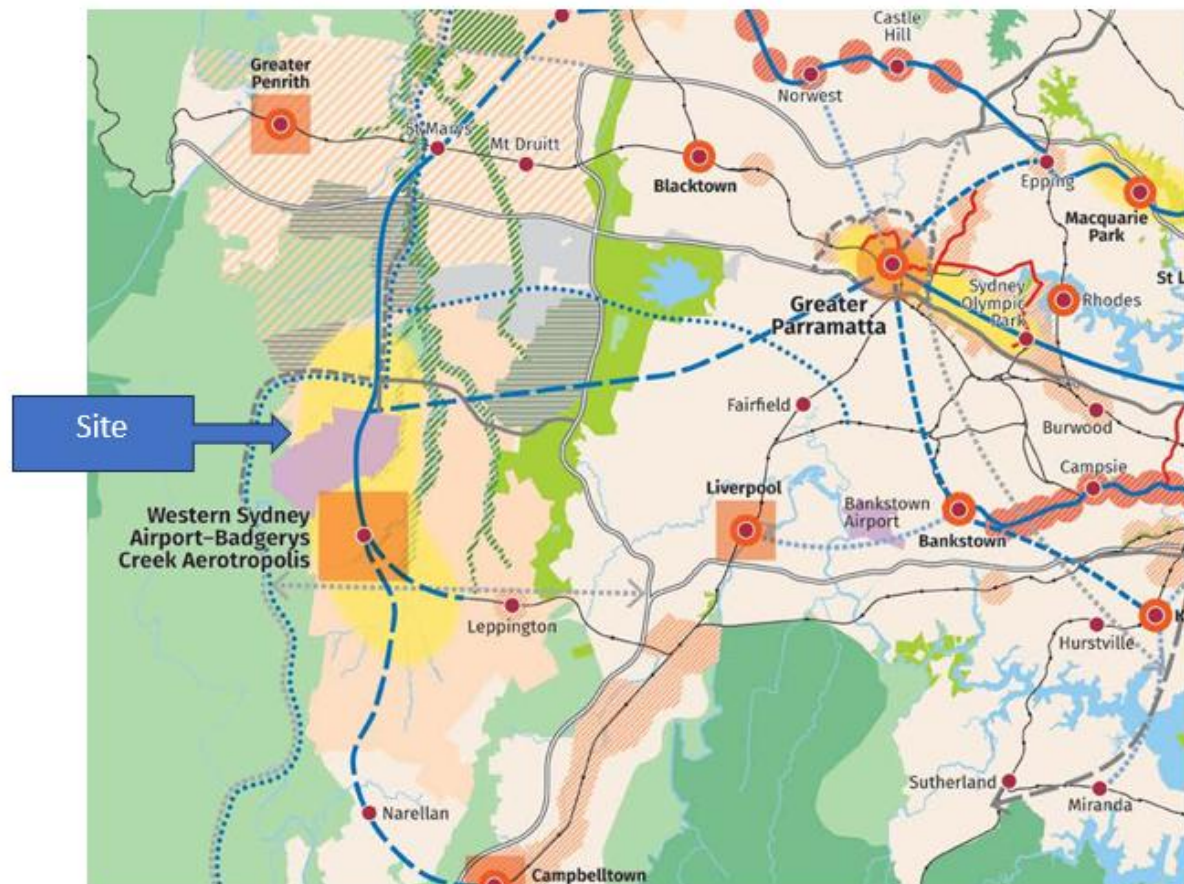


Figure 1 – Regional Context

Source: *A Metropolis of Three Cities – Greater Sydney Region Plan* (Greater Sydney Commission, 2018)

The Site

The site is 40 Eaton Road, Luddenham, legally described as Lot 4 DP 1234822 (the site). It is located on the northwest side of The Northern Road and Eaton Road intersection. The site is in the agribusiness precinct of Western Sydney Aerotropolis, within the local government area of Liverpool.

Directly adjoining the site is mostly agricultural grazing land. On the western side of The Northern Road, Luddenham village is located approximately 400 metres from the site. “Robyn Vale”, a residential dwelling, is located on the lot south of the site. To the southwest of the site, across Eaton Road, is the site of the former Lawson Inn. This site is an archaeological site identified as a local heritage item in the State Environmental Planning

Policy (Precincts—Western Parkland City) (SEPP). The Western Sydney Airport site is located approximately 140 metres to the south of the site, and the runway is located approximately 500 metres to the south.

The site is gently undulating and mostly cleared, covering an area of 96,700m². Its highest point, 100 AHD, is near the intersection of Eaton Road and The Northern Road. The site slopes to the north and east, with the lowest area in the eastern corner, at 89 AHD.

Access to the site is gained from Eaton Road. Once the new road network is constructed in accordance with the Aerotropolis Precinct Plan, access will be gained from a new collector road.

The site has previously been used for grazing and a truck holding yard.

Proposed Development

The project comprises five warehouses with ancillary office space and an office building. It is proposed that Warehouse 2B, being 11,900 m², is climate-controlled providing an opportunity for agribusiness.

Figure 2 shows the preliminary concept plan for the development, and Table 1 outlines the main components of the proposed development. It is noted that the development details may change as the proposal is developed and end-users are identified.

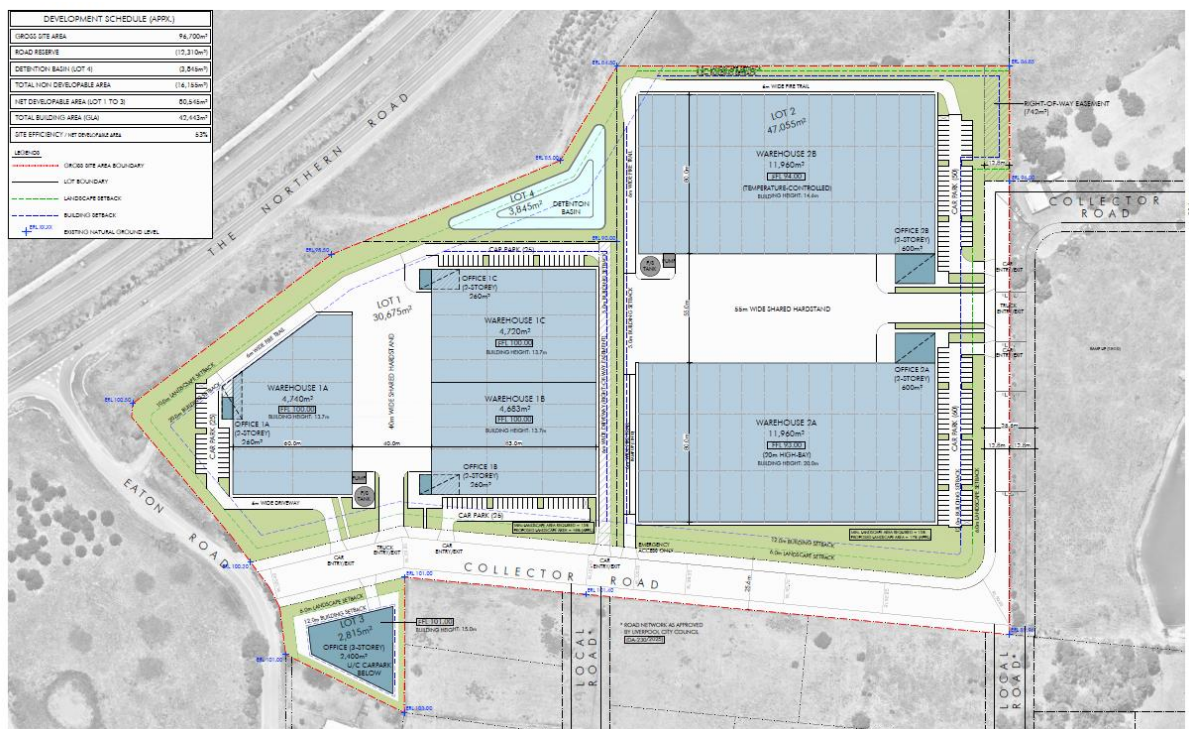


Figure 2 – Airlink Estate 40 Eaton Road Luddenham

The warehouses are proposed to be developed for as-yet-unidentified end users, providing opportunities for agribusiness industries consistent with the objectives of the Agribusiness zone. The development would be capable of supporting high-tech food and agriculture

industries and is likely to include automated facilities. The proposed 11,900 m² of warehouse climate-controlled warehouse facilities the potential to support the Integrated Logistics Hub Airfreight Interface envisioned in the Western Sydney Aerotropolis Plan (Western Sydney Planning Partnership , 2020).

Table 1: Development Summary													
Development Summary	- Vegetation clearing and earthworks - Construction of roads and intersections - Construction of five warehouses, ancillary offices, and an office building. - Ancillary development, including car parking, infrastructure and landscaping												
Proposed Use	End users are yet to be determined. Warehousing and distribution, with ancillary offices to provide the opportunity for agribusiness uses to support the Integrated Logistics Hub outlined in the Western Sydney Aerotropolis Plan and Western Sydney Aerotropolis Precinct Plan (NSW Government, 2022)												
Clearing, Demolition and Earthworks	The site is mainly cleared and covered with grasses. Earthworks are proposed to accommodate the proposed warehouses and ancillary development, such as car parking.												
Warehouses	The total preliminary area of the proposed warehouses is 42,443 m², distributed across 5 buildings, including 1,980 m² of ancillary office space and a 2,400 m² office building with undercroft car parking. The development will be staged as follows: <table border="1"> <tr> <td>Stage 1 – Warehouse 1A</td><td>Warehouse 4,740m² Office 260m²</td></tr> <tr> <td>Stage 2 – Office</td><td>Office 2,400m² with undercroft car parking</td></tr> <tr> <td>Stage 3 – Warehouse 1B and Warehouse 1C</td><td>Warehouse 1B - 4,683m² Office 260 m² and Warehouse 1C – 4,720 683m² and Office 260 m²</td></tr> <tr> <td>Stage 4 – Warehouse 2A</td><td>Warehouse 11,960m² Office 600 m²</td></tr> <tr> <td>Stage 5 – Warehouse 2B</td><td>Warehouse 11,960m² Office 600 m²</td></tr> <tr> <td colspan="2">Staging may be adjusted subject to the needs of end users.</td></tr> </table> All warehouse development will comply with the Precinct Plan maximum height of 24 metres.	Stage 1 – Warehouse 1A	Warehouse 4,740m ² Office 260m ²	Stage 2 – Office	Office 2,400m ² with undercroft car parking	Stage 3 – Warehouse 1B and Warehouse 1C	Warehouse 1B - 4,683m ² Office 260 m ² and Warehouse 1C – 4,720 683m ² and Office 260 m ²	Stage 4 – Warehouse 2A	Warehouse 11,960m ² Office 600 m ²	Stage 5 – Warehouse 2B	Warehouse 11,960m ² Office 600 m ²	Staging may be adjusted subject to the needs of end users.	
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Stage 5 – Warehouse 2B	Warehouse 11,960m ² Office 600 m ²												
Staging may be adjusted subject to the needs of end users.													
Signage	Estate and building identification, business identification and directional signage												
Hours of Operation	24 hours a day, 7 days per week												
Capital Investment value	>50M												
Roads	The site has frontage to The Northern Road; however, it is proposed that interim access to the site be gained from Eaton Road, with longer-term access to be provided via the												

	construction of the collector road in accordance with the Precinct Plan (NSW Government, 2022). Due to the potential timing of constructing the collector road through properties to the northwest, interim access via Eaton Road may be required. It is envisaged that, once the road network proposed in the Precinct Plan is completed, the Eaton Road access will be a secondary access due to the left-in, left-out restriction at the intersection of Eaton Road and The Northern Road. The precinct plan shows the collector road running east-west through the middle of the site. The east-west section of the collector road is proposed to be relocated to extend along the site's southern boundary. The north-south section of the collector road will be located half on the subject site and half on the adjoining site. This proposal has been developed in conjunction with the adjoining owner, Bull Capital.
Stormwater	On-site detention will be adopted for the site with a long-term connection to the regional stormwater system.
Potable Water, Sewer, Electricity and Telecoms	The site would be connected to a reticulated water system and the Advanced Water Recycling Facility at Kemps Creek. The Aerotropolis's current drinking water supply strategy is to supply from the Prospect South delivery system via the Cecil Park water supply zone and a proposed new water supply zone. A new 60ML reservoir is proposed near the end of Elizabeth Drive within the Agribusiness precinct.

Strategic Planning Context

Draft Sydney Plan

The Draft Sydney Plan recognises that industrial lands are vital to Sydney's productivity and identifies a current shortfall in supply. The draft plan states that 51% of the undeveloped industrial land is located in the Western Sydney Aerotropolis. The proposed development is located in a short-term service area, and it will support the delivery of needed warehouse and logistics infrastructure. (Department of Planning, Housing and Infrastructure, 2025).

Greater Sydney Region Plan – A Metropolis of Three Cities

The Greater Sydney Region Plan (Region Plan) is built on a vision of three cities, with most residents within 30 minutes by public transport of their nearest strategic or metropolitan centre. (Greater Sydney Commission, 2018) The region plan recognises that the strength of Western Parkland City lies in the new Western Sydney Airport (Nancy Bird-Walton) and the Aerotropolis. The plan recognises that the Western Parkland City will include expansive industrial lands to the north and east of the airport, providing for Greater Sydney's long-term freight logistics and industrial needs. The site is ideally located with access to the airport, M12 and The Northern Road to support the uses outlined in the Region Plan.

Western City District Plan

The site is located in the Western Parkland City. The Western City District Plan (Greater Sydney Commission, 2018) cites the new airport as driving population growth, improved transport links and creating new jobs and economic opportunities. The proposed development is consistent with planning priority W8 of the Plan:

Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis.

Western Sydney Aerotropolis

Western Sydney Aerotropolis Plan

The Western Sydney Aerotropolis Plan envisions the city as Australia's next global gateway, built around the Western Sydney International (Nancy Bird Walton) Airport (Western Sydney Planning Partnership, 2020). The site is located in the Agribusiness precinct, one of the initial precincts to be rezoned in 2020. The Aerotropolis Plan describes development within the agribusiness precinct benefiting from national and international trade and includes an integrated logistics hub that creates land- and airside linkages, providing safe, secure, and seamless connectivity for freight movement. The proposed development, combined with its location off The Northern Road and its accessibility to the M12 and the airport, provides the perfect opportunity for agribusiness uses.

Aerotropolis Sector Plan

The Aerotropolis Sector Plan outlines how and when infrastructure delivery priorities will service land and provides infrastructure delivery timeframes over three time horizons. (NSW, 2025).

These horizons align with development stages and WSI Airport operations:

- 2027 (2 years): serving early airport operations and initial Aerotropolis development.
- 2030 (5 years): serving Aerotropolis growth and demand from airport operations.
- 2040 (15 years): serving the Aerotropolis and the airport as they mature.

The subject site is located within the 2027 time horizon, as shown in Figure 3

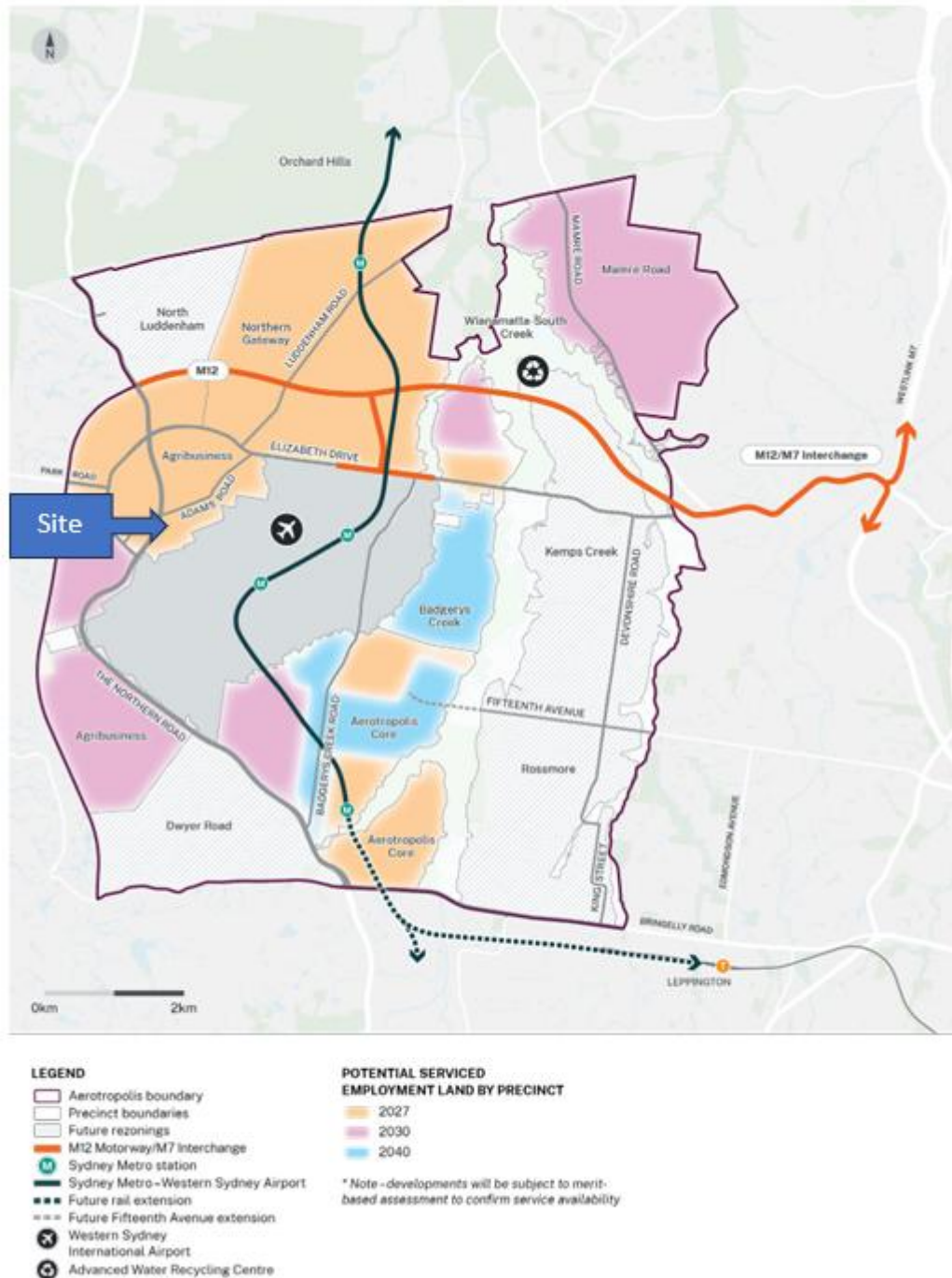


Figure 3 – Infrastructure Delivery Phasing

Source: Aerotropolis Sector Plan (NSW, 2025)

For land within the Agribusiness precinct, the Sector Plan states:

- the upgrades to The Northern Road provide adequate road capacity to support development;
- intersections between The Northern Road and local roads may require upgrading;
- development may require interim, developer-led solutions for wastewater; and
- integrated stormwater management will be in place after 2028 with an interim solution required for development that proceeds earlier.

As part of preparing the Environmental Impact Statement (EIS) to support the application, transport and access to the site will be investigated, including the need for intersection upgrades. The proponent will work with Sydney Water on stormwater treatment, with a view to adopting a permanent, long-term regional solution where possible.

Statutory Planning Context

State Significant Development

A summary of the statutory requirements is outlined in Table 2 below

Table 2 – Summary of Statutory Requirements	
Legislation	Response
Power to Grant Consent	The proposal is classified as a State Significant Development under Part 4, Division 4.7 of the Environmental Planning and Assessment Act 1979 (EP&A Act), as it involves development with a capital investment value exceeding \$50 million for warehousing and distribution purposes. Therefore, it triggers the criteria in Clause 12 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011. Consequently, the Minister for Planning and Public Spaces is the consent authority for the proposed development
Permissibility	The site is zoned AGB Agribusiness under the State Environmental Planning Policy (Precincts—Western Parkland City) (SEPP). Pursuant to clause 4.12 of the SEPP, Warehouse and logistics are permitted with development consent.
Other Approvals	
Consistent Approvals -An environment protection licence under Part 3 of the NSW Protection of the Environment Operations Act 1997	Section 48 of the Protection of the Environment Operations Act 1997 requires an environment protection licence to undertake scheduled activities at any premises. Scheduled activities are defined in Schedule 1 of the Protection of the Environment Operations Act 1997. The proposal is not a scheduled use, as the construction of the road will not exceed the extraction material threshold or result in a classified road.
Commonwealth Environment Protection and Biodiversity Act 1999	The EPBC Act aims to protect matters of national environmental significance (MNES). If an action will, or is likely to, have a significant impact on any MNES, it is deemed to be a 'controlled action' and requires approval from the Commonwealth Environment Minister or the Minister's delegate.

	A search of the Commonwealth Protected Matters Search Tool indicates that there are no World Heritage Properties or National heritage places within the vicinity of the proposal.
Biodiversity Conservation Act 2016	The site is not identified on the Biodiversity Values map and has already been cleared.
Fisheries Management Act 1994	The proposal will not physically alter aquatic habitats, obstruct fish passage, or involve specialised fishing; therefore, approval under the Act is not required.
Water Management Act 2000	A controlled activity approval may be required for the proposal as a Strahler 1 stream is identified on the site.
Roads Act 1993	Under Section 138 or Part 9, Division 3 of the Roads Act 1993, a person must not undertake any works that impact on a road, including connecting a road (whether public or private) to a classified road, without approval of the relevant authority, being either Transport for NSW or local council, depending upon the classification of the road. The interaction of the proposal with the local and regional road network will be addressed in the EIS.
Pre-conditions to exercising the power to grant approval	State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP) requires the consent authority to consider whether the subject land of any rezoning or DA is contaminated. If the land requires remediation to ensure that it is made suitable for a proposed use or zoning, the consent authority must be satisfied that the land can be suitably remediated for that purpose. The EIS will outline how the site is able to be made suitable for the proposed land uses.
Consistent Approvals	Section 4.42 of the EP&A Act outlines that the approvals listed below cannot be refused if necessary for carrying out an approved SSD and are to be consistent with the terms of the development consent for the SSD.
An environment protection licence under Part 3 of the NSW Protection of the Environment Operations Act 1997	Section 48 of the Protection of the Environment Operations Act 1997 requires an environment protection licence to undertake scheduled activities at any premises. Scheduled activities are defined in Schedule 1 of the Protection of the Environment Operations Act 1997. The proposal is not a scheduled use as the construction of the road will exceed the

	extraction material threshold or be a classified road.
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State Environmental Planning Policy (Precincts – Western Parkland City) 2021
The State Environmental Planning Policy (Precincts—Western Parkland City) (**SEPP**) outlines the statutory planning provisions that apply to the Aerotropolis and aims to facilitate development in accordance with the Western Sydney Aerotropolis Plan. The site is zoned AGB Agribusiness under the SEPP (see Figure 4).

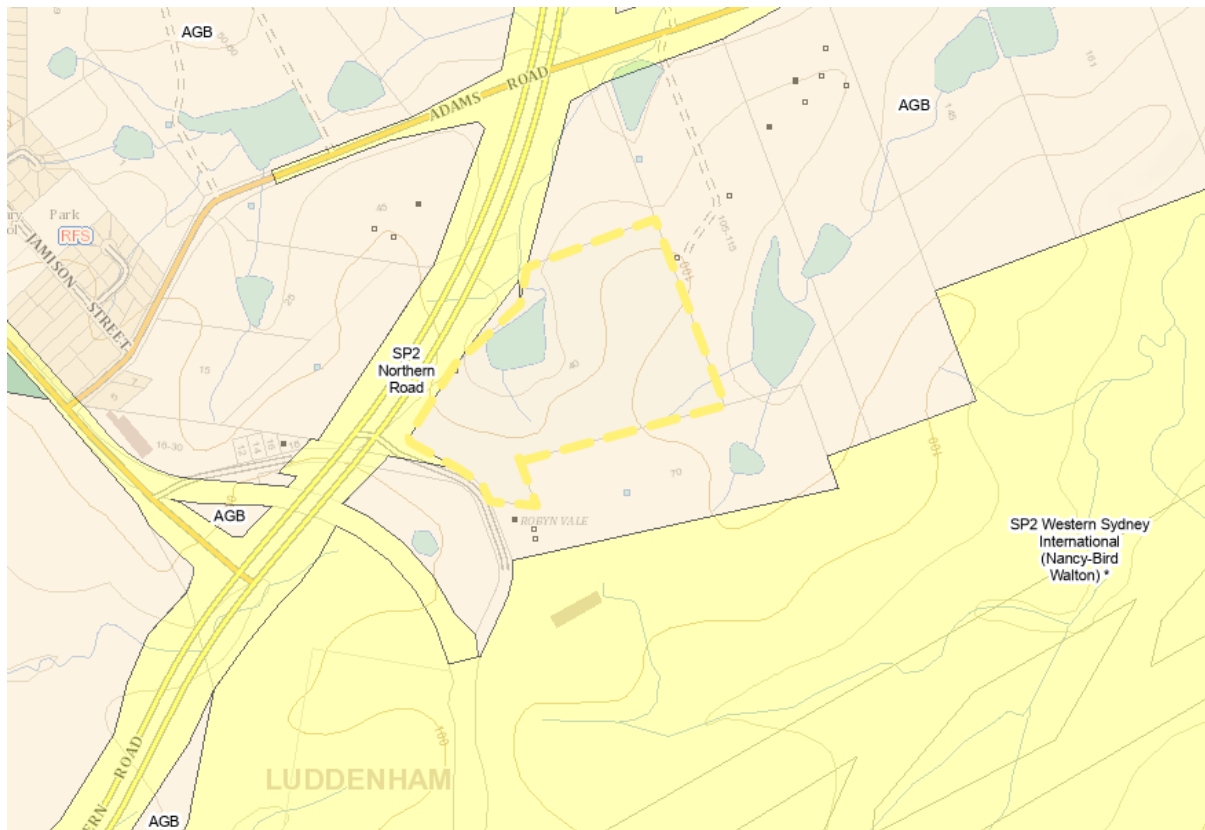


Figure 4- Zoning

Source: NSW Planning Portal 25 March 2025

Land Use Permissibility

Pursuant to clause 4.12 of the SEPP, Warehouse and logistics are permitted with development consent. The proposed development is generally consistent with the zone's objectives, as outlined in Table 2.

Table 2 – Agribusiness Zone Objectives	
Zone Objective	Development's Response
To encourage diversity in agribusiness, including related supply chain industries and food production and processing that are appropriate for the area.	The proposed development will provide the opportunity to establish a range of agribusiness uses that may be part of the supply chain. The inclusion of climate control facilities in the development provides flexibility for future uses, making the development particularly attractive for the establishment of agribusiness.

To encourage sustainable and high technology agribusiness, including agricultural produce industries.	As described above, the proposed development will provide the foundation for the establishment of high-technology agribusiness, subject to the identification of the end user.
To enable sustainable agritourism.	The proposed warehouse's varied sizes increase flexibility for end users, enabling a wide range of uses, including agritourism.
To encourage development that is consistent with the character of Luddenham village.	This objective mainly applies to the development adjoining or within the Luddenham village. The site is located outside the village, on the western side of The Northern Road, and will not adversely affect the village's character.
To maintain the rural landscape character and biodiversity of the area.	No environmentally sensitive land is identified on the site. The site will incorporate landscaping to minimise the proposal's visual impact.

Planning Controls

Preliminary consideration of the proposed development against the development controls in Chapter 4 of the Western Parkland City Precincts SEPP is outlined in Table 3

Table 3 Western Parkland City SEPP Development Controls.	
Clause	Comment
4.17 Aircraft Noise	The proposed development is not a noise-sensitive development
4.18 Building Wind Shear	The development is not within the Windshear Assessment Zone
4.19 Wildlife Hazards	The development is not defined as "relevant development" for the purposes of this clause
4.20 Wind turbines	Not applicable
4.21 Lighting	The site is within Light Control zones C and D and the 6 km light intensity zone. Once the proposed external lighting is resolved, the relevant Commonwealth Body will be consulted as required by the SEPP.
4.22 Airspace operations	The Obstacle Limitation Surface for the site is 126 m AHD. The maximum building height is 20m and does not penetrate the OLS.
4.23 Public Safety	The site is not within the public safety area.
4.23A Operation of certain air transport facilities	The site is not within the building restricted area.
4.24 Flood Planning	The site is not shown with the 1 in 100 AEP Flood extent
4.25 Preservation of Trees	The site does not include any existing native vegetation, nor is it zoned Environment and Recreation
Clearing of Native Vegetation	The site does not contain any existing native vegetation.
4.26 Heritage Conservation	A local heritage item is identified on Lot 3 DP 1234822 – 2155, The Northern Road, being the site of the former Lawson's Inn. (formerly The Thistle). This item is opposite the site on the southern side of Eaton Road. This is an archaeological site with no discernible structure visible on the site. The SEPP states that the consent authority may

	require a heritage impact assessment of development in the vicinity of an identified heritage item. Given the nature of the item, a HIA is not considered relevant in these circumstances.
4.27 – Transport Corridor	The site is not within or within 400 metres of an identified transport corridor.
4.28 Warragamba Pipelines	The site is not land shown as Warragamba Pipeline
4.28A Sydney Science Park	The site is not within the Sydney Science Park
4.28B Aboriginal cultural guidelines	As an SSD, the proposed development will follow the process outlined in the Recognise Country: Guidelines for Development in the Aerotropolis, published on the Department's website in November 2022.
4.31 Design Review Panel	The proposed development triggers the requirement for consideration by the design review panel as it is SSD.
4.32 Design Competition	Not applicable as the proposed development is less than 40m in height above existing ground level
4.33 Consideration of Design Excellence	The design excellence provisions will be considered in the design of the estate and addressed in the EIS

Western Sydney Aerotropolis Precinct Plan

The Western Sydney Aerotropolis Precinct Plan 2022 (WSA Precinct Plan) was prepared in accordance with Clause 4.39 of the Western Parkland City SEPP.

The Precinct Plan provides the place-based objectives and controls to guide development in the Aerotropolis in a consistent and sustainable manner. Part 2.6 of the WSA Precinct Plan outlines the vision and objectives for the development of the Agribusiness Precinct, which focus on agribusiness uses, including integrated logistics, air freight, integrated intensive production, food innovation, fresh products, and value-added food-pharmaceuticals.

Precinct Plan Vision and Objective

The Precinct Plan states that the agribusiness precinct allows the development of agribusiness uses, including integrated logistics, air freight, and value-added food-pharmaceuticals. The proposed development is consistent with these uses, as it provides opportunities for agribusiness through warehousing, logistics, climate-controlled warehousing development. The proposal will enable agricultural value-added industries and related freight and logistics facilities to access the Outer Sydney orbital and airside access to the Western Sydney Airport, as outlined in the Precinct Plan.

Infrastructure Development and Staging

The consent authority must be satisfied that essential services and infrastructure are available prior to granting consent. The Infrastructure NSW Sector Plan outlines the time horizons for service delivery. In preparing the EIS to support the development, the team will work with DPHI, Transport for NSW, and Sydney Water to address essential services.

Although largely superseded by the Sector Plan, the site is located within the first priority area in the Precinct Plan (see figure 5).

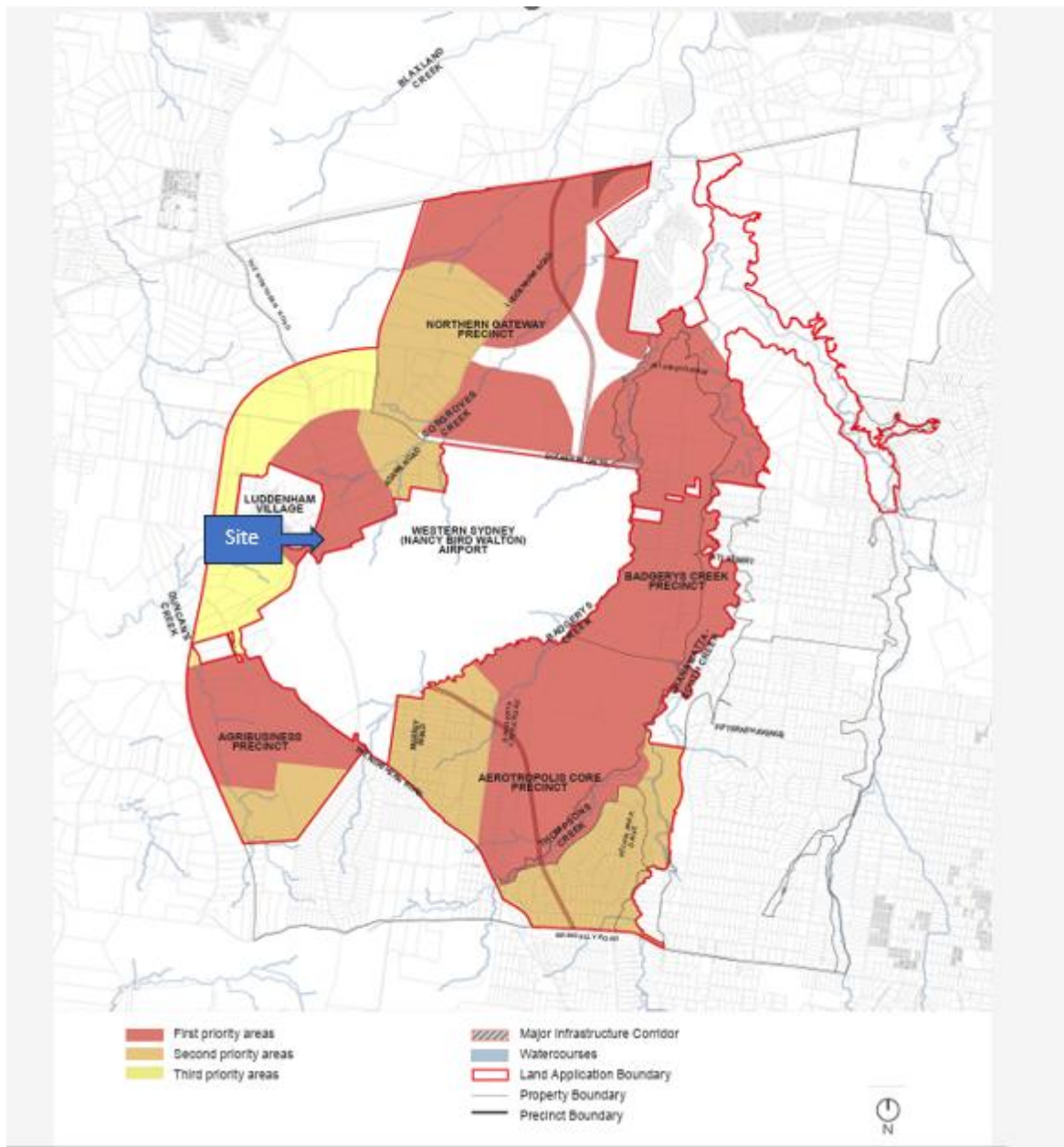


Figure 3 – Infrastructure NSW Infrastructure Delivery Timeframes

Source Aerotropolis Sector Plan (NSW, 2025)

Urban Structure

The proposal is consistent with the Land Use and Structure Plan, as the development will include opportunities for establishing agribusiness.

Aboriginal Culture and Heritage

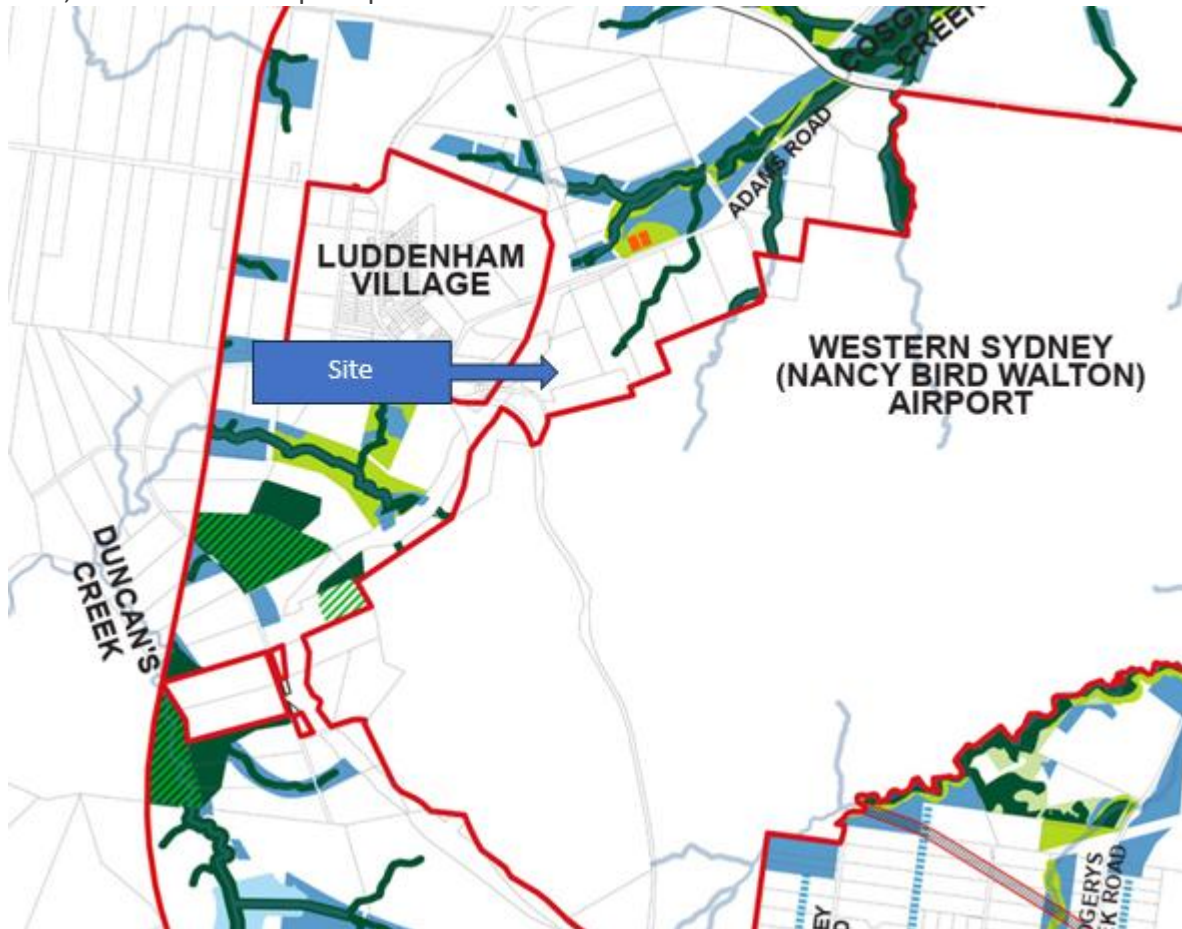
The site is not within an area of Aboriginal sensitivity. The proposal meets the requirement for the adoption of Recognise Country – Guidelines for development in the Aerotropolis, as the proposal is SSD. The process outlined in the Guidelines will be used to prepare the plans and EIS.

Non-Aboriginal and European Heritage

As stated in this report, the former Lawson Inn site, an identified heritage item for its potential archaeological value, is located on the southern side of Eaton Road. The Precinct Plan objective requires the design and development in the vicinity of heritage items to protect the significance of the item and its setting. In this instance, the development will not impact the archaeological significance of the site and a HIA is not necessary. Reference to the existence of the item can be dealt with in the body of the EIS.

Blue- Green Infrastructure Framework

The subject site does not have riparian or blue-green infrastructure identified in the Precinct Plan, and there is no open space on the site.



Total Water Cycle Management

The proposal will be supported by a Water Management Plan to address stormwater management for the site. No land on the subject site is identified to support the regional stormwater network.

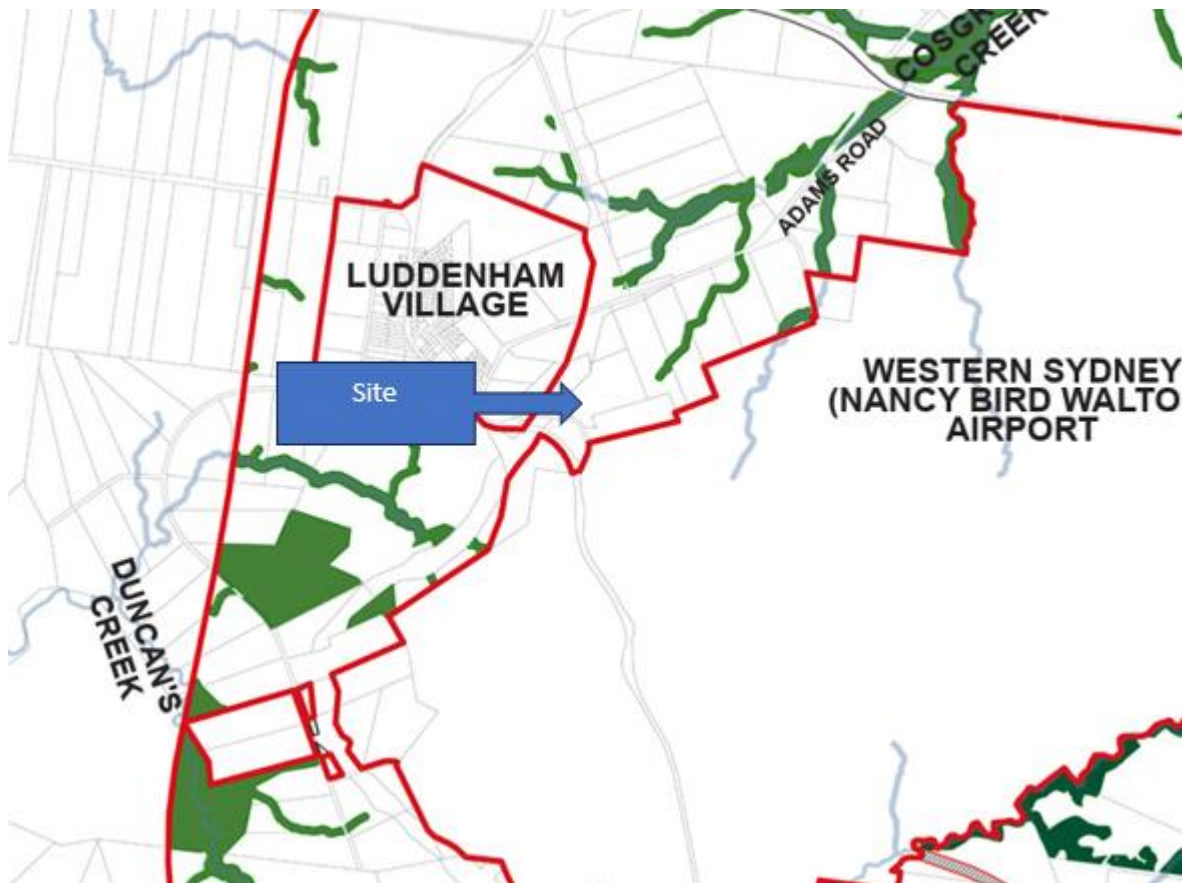


Public Domain and Canopy Cover

The precinct plan requires the tree canopy along Collector Street to reach a minimum of 40% at maturity, measured as a percentage of the road reserve. This requirement will be considered in the design of the collector road.

Biodiversity and Vegetation Corridors.

No vegetation identified under the Cumberland Plain Conservation Plan is identified on the subject site.

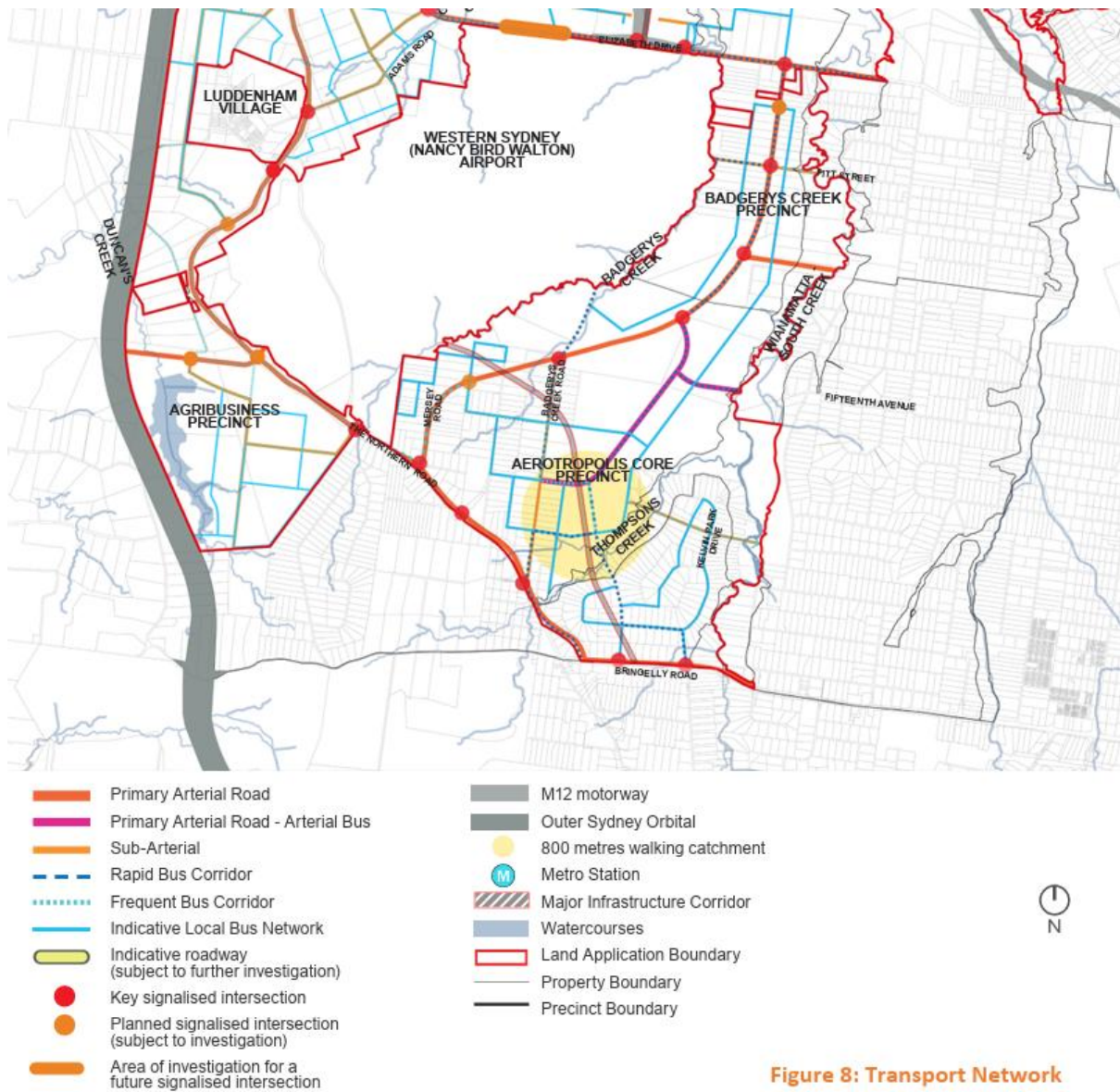


Approved species will be used in the development landscaping.

Movement Framework

The Precinct Plan requires the Transport network to be designed generally in accordance with the Plan. The plan provides for flexibility in the location of local roads and collector roads.

The Transport Network is designed to accommodate bus corridors and the Indicative Local Bus Network, generally as shown, so that 90% of businesses are within a 400-metre walk of a street that is capable of carrying public transport in the Enterprise Zone and Agribusiness Zone.





It is proposed to relocate the collector road, and therefore, the Indicative Local Bus Network will be relocated to the southern boundary of the site so that the road does not sever the site. The 400-metre requirement will be discussed with Transport for NSW and addressed in the EIS. The cycle path shown on the collector road in the precinct plan would also be relocated.

The Precinct Plan states that the layout of Local Street and Collector Road is indicative. Where a Development Application proposes a variation to a collector road, as proposed in this development application, the applicant must demonstrate that the proposal:

- a) Achieves a permeable street network;
- b) Encourages walking and cycling and minimises travel distances;
- c) Maximises connectivity to community facilities, open space and centres;
- d) Takes into account topography and the flow of water in the landscape;
- e) Will not detrimentally impact access to adjoining properties or result in isolation of properties; and
- f) Will not impede the orderly development of adjoining properties.

It is considered that the proposal can be demonstrated to meet these requirements, and the road will be designed to meet the design requirements in the precinct plan.

Maximum Building Height

The Precinct Plan stipulates a maximum building height of 24 metres for the site. The proposal complies with the maximum height with Warehouse building 2A being 20m. Initially, the proposal incorporated high bay for Warehouse 2A, at 32m although still well below the OLS. The high bay was also situated on the lower part of the site to reduce the visual impact of the additional height. The inclusion of high bay would have increased the opportunity for automation and allow greater flexibility to meet the objectives of the agribusiness zone. However, feedback from the Department during the pre-SEARS meeting indicated that the high-bay element would not be supported. This element has therefore been removed although this building is still proposed to have a height of 20m to provide flexibility in terms of use.

Western Sydney Aerotropolis Phase 2 DCP

The Western Sydney Aerotropolis Phase 2 Development Control Plan (Phase 2 DCP) came into effect on 10 November 2022 and identifies the planning controls for development within the Aerotropolis. While a DCP does not apply to State Significant Development, the EIS will address the Phase 2 DCP controls as they apply to the proposed development.

Engagement

Preliminary consultation has been undertaken with the Department of Planning Housing and Infrastructure (**DPHI**) regarding the planning pathway, industry-specific SEARs, zone objectives, and variations to the precinct plan. The project has been varied following feedback from the Department in relation to the building height, as noted above, and moving the project from an Industry SEARs to Project-specific SEARs pathway.

Consultation will be undertaken with Transport for NSW (**TfNSW**) and Sydney to prepare the EIS. As the site is located within the 2027 infrastructure delivery horizon in the Sector Plan, road capacity and stormwater solutions should be able to be addressed. The proponent will consult TfNSW regarding the interim use of Eaton Road as access to the site prior to the construction of the new collector road through land to the north west of the site in accordance with the precinct. Construction of this road will enable access to Adams Road.

FTD Holdings has a commercial relationship with the future owners of the land holdings to the northwest, Bull Capital, through which the new collector road will be constructed. FTD Holdings has commenced discussions with Bull Capital regarding the construction of the collector road. It is understood that Bull Capital will seek Development Consent for its holdings in a similar timeframe to this application. FTD Holding has also reached out to the other adjoining landowners to initiate dialogue regarding the proposed development and road access.

Once the SEARs have been issued, the proponent will request a meeting with Liverpool Council.

A detailed engagement strategy will be implemented during the preparation of the EIS, including consultation with state agencies, the Council, the Local Aboriginal Land Council, surrounding landowners, the Luddenham community, and other relevant stakeholders. The

proponent will also brief the Independent Community Commissioner, Roberta Ryan, so she is fully informed, pending any enquiries from the community.

Other Environmental Issues

Table 4 outlines a desktop review of environmental issues applicable to the proposal. The environmental issues will be fully examined in the preparation of the EIS.

Table 4 – Other Environmental Issues	
Issue	Comment
Design and Visual Impact	The site is not within any identified area of visual significance but will be visible from The Northern Road, the heritage item to the south, and Luddenham village. The design of the building and landscaping will consider the potential visual impacts.
Soil and Water	The site is gently undulating with an overall slope to the north and west. The proposal involves earthworks to establish level pads for the warehouses. A detailed erosion and sediment control plan will be implemented for the site. A Rapid Site Assessment Report was undertaken in 2024 to determine the potential for site contamination. Because part of the site was previously used as a truck holding yard, it is recommended that some surface material be removed. Upon a change in use, a full Phase 1 Site Assessment will need to be undertaken, and if necessary, a Remedial Action Plan may be required. The site is not affected by flooding. Stormwater management will be assessed as part of the EIS,
Noise and Vibration	The warehouse will operate 24 hours, seven days per week. Luddenham village is approximately 400 metres to the west of the site. A residential receptor, “Robyn Vale,” is located on adjoining land south of the site. Western Sydney Airport is located approximately 100 metres to the south of the site. The site is within the N70 contour and is predicted to experience between 50 and 99 overflight events exceeding 70 decibels over a 24-hour period. Considering the proposed use of the site, this will not cause any issues. A detailed noise assessment, including a cumulative noise assessment, will be required as part of the EIS for the warehouse design to minimise potential noise impacts.
Hazards and Waste	The development of climate-controlled facilities would likely involve storing some dangerous goods and hazardous materials. Otherwise, the warehouses are unlikely to involve storing dangerous goods above the thresholds in the Resilience and Hazards SEPP. The EIS will consider the storage of dangerous goods against the requirements of the Resilience and Hazards SEPP. If the thresholds are exceeded, a Preliminary Hazard Analysis (PHA) will be undertaken for the proposal in accordance with the requirements of the SEPP.

	Although the proposal is not expected to generate significant quantities of waste, a Waste Management Plan will be prepared for it.
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Conclusion

40 Eaton Road is ideally located to meet the objectives of the Aerotropolis Plan, as it provides an opportunity to establish agribusiness in a warehouse and logistics development that is flexible in design, offering 38,073 m² of warehouse floor area across a variety of floor space sizes and combinations. The inclusion of climate control provides opportunities for a range of agribusiness uses consistent with the intent of the planning controls.

The proponent is confident that the environmental impact assessment process can address any planning and environmental issues.

References

- Department of Planning, Housing and Infrastructure. (2025). *The Sydney Plan (Draft)*. Sydney: NSW Department of Planning Housing and Infrastructure.
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- NSW Government. (2022). *Western Sydney Aerotropolis Precinct Plan* . Sydney : NSW Government.
- NSW, I. (2025). *Aerotropolis Sector Plan* . Sydney : NSW Government .
- Western Sydney Planning Partnership . (2020). *Western Sydney Aerotropolis Plan* . Sydney: NSW Government.

Attachments

- A. Site Survey
- B. Site Survey Aerial Photograph
- C. Development Master plan
- D. Location Plan
- E. Indicative Elevations