



Scoping Report

Ferndale Industrial Precinct (Stage 2 and 3)

275 Adams Road, Luddenham

Submitted to Department of Planning, Housing and Infrastructure
on behalf of CFT No. 13 Pty Ltd

Prepared by Colliers Urban Planning

17 October 2025 | 2250822



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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This document has been reviewed by

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Version No.	Date of issue	Prepared by	Approved by
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Attachments

Attachment	Author
A. Indicative Site Plan	Reid Campbell

1.0 Introduction

This Scoping Report has been prepared by Ethos Urban on behalf of CFT No. 13 Pty Ltd, a member of Coombes Property Group (CPG or the Applicant) in support of the proposed development of Warehouse and Distribution centres located on land at 275 Adams Road, Luddenham. It seeks to inform the Department of Planning, Housing and Infrastructure (DPHI) to enable the preparation of project-specific Secretary's Environmental Assessment Requirements (SEARs) to enable the preparation of an Environmental Impact Statement (EIS) that will accompany a State Significant Development Application (SSDA).

Development on land within the Western Sydney Aerotropolis (WSA) with an estimated development cost of more than \$30 million is identified in Schedule 1, Section 29 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) and is therefore declared to be State Significant Development (SSD) for the purposes of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

This Scoping Report has been prepared in accordance with the DPHI's State Significant Development Guidelines (2022). This report should be read in conjunction with the Indicative Site Plan prepared by Reid Campbell Architects (**Attachment A**).

1.1 Applicant Details

The Applicant's details are presented in **Table 1** below

Table 1 *Applicant Details*

Applicant:	CFT No. 13 Pty Ltd
Address:	Level 5, 2 Grosvenor Street, Bondi Junction NSW 2022
ABN:	32 528 255 331

1.2 Project Description

1.2.1 Objectives

The primary objective of the proposed development is to establish a high-quality industrial logistics estate that supports the Agribusiness Precinct within the Western Sydney Aerotropolis, leveraging the site's proximity to key freight transport corridors as well as its strategic location near the Western Sydney International (Nancy-Bird Walton) Airport (WSI Airport).

The objectives of the proposed development as described as follows:

- Deliver an industrial estate on a site that has been determined suitable for accommodating industrial uses in accordance with the zoning of the site intended to support agricultural businesses and associated activities,
- Contribute much-needed floorspace, supporting the development of suitably zoned land to support agribusiness warehousing and distribution needs and addressing the current shortfall in warehousing supply.
- Create highly functional and efficient warehouses that meet both current and future market requirements.
- Establish a well-connected agribusiness warehousing estate in close proximity to key freight transport corridors and trade gateways, including the M7 Motorway and the WSI Airport.
- Contribute to Western Sydney's economic growth by supporting job creation close to workers and strengthening the broader NSW economy.
- Support the coordinated delivery of infrastructure in Western Sydney, including upgrades necessary to accommodate the proposed development and future surrounding growth.

1.2.2 Site Overview

The Site is located within the Liverpool Local Government Area (LGA), forming part of the Western Sydney Aerotropolis. It is approximately 19 kilometres north-west of Liverpool, 25 kilometres south-west of Parramatta, and 43 kilometres south-west of the Sydney CBD.

The Site is identified as 275 Adams Road, Luddenham and is zoned AGB – Agribusiness under *State Environmental Planning Policy (Precincts—Western Parkland City) 2021* (WPC SEPP). It adjoins the western boundary of the WS Airport and is separated from the Airport by an ENZ – Environment and Recreation buffer zone located along Oaky Creek.

To the west is the largely rural suburb of Luddenham, including Luddenham Village which is located approximately 2.5 kilometres away. The intervening rural land has been rezoned under the WPC SEPP to accommodate future airport-supporting agribusiness uses. These lands, including the Western Sydney Airport Business Park (SSD-64409468) currently being assessed by DPHI, are expected to deliver developments of a similar typology to the Proposal, including agribusiness warehouse and logistics uses within the Agribusiness Precinct.

An aerial of the site and its regional context is provided in **Figure 1**, further details of the site are provided in **Section 2.2**.

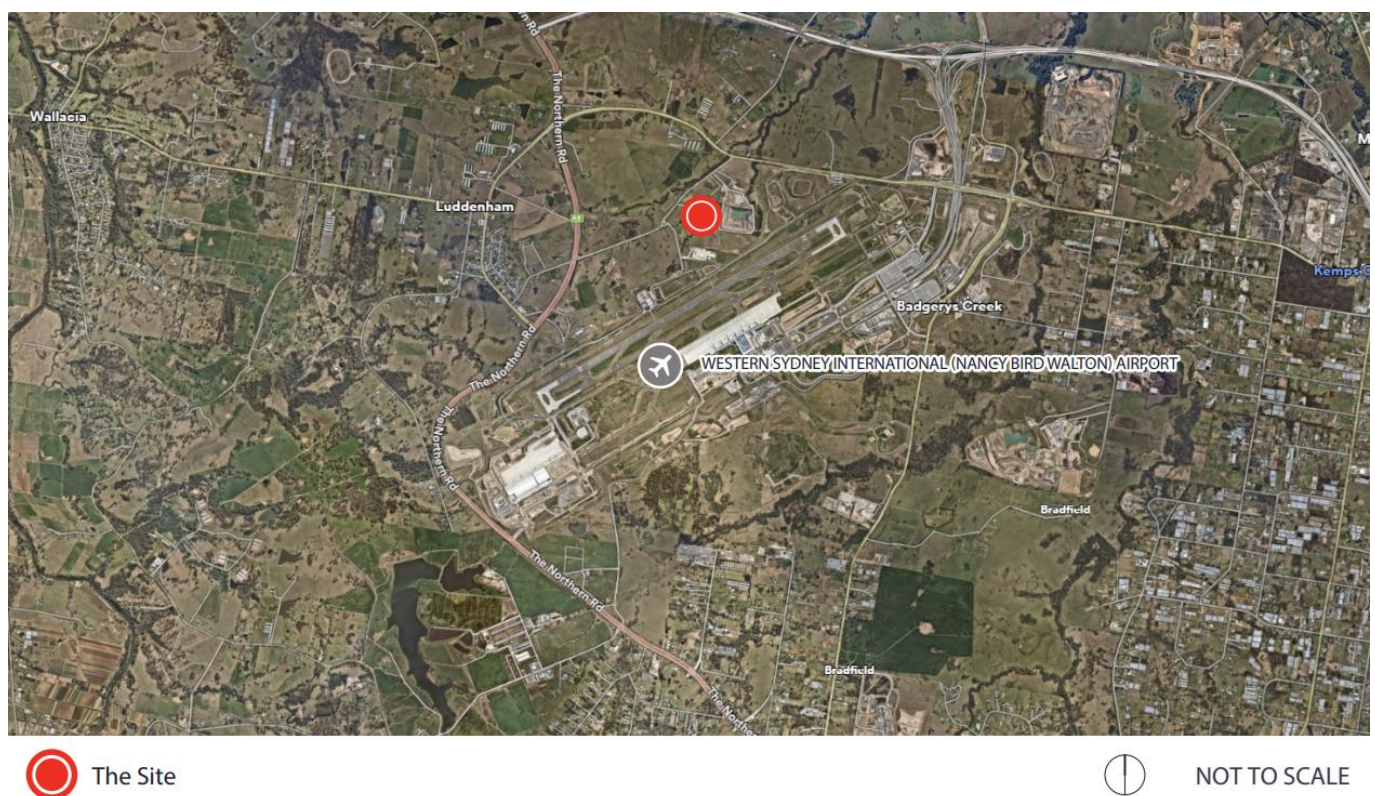


Figure 1 Site Context Map

Source: Nearmap, Ethos Urban

1.3 Background

1.3.1 Quarrying Operations

The Site currently contains a shale quarry located in the south-eastern portion of the land. Quarrying operations at 275 Adams Road, Luddenham were originally approved under Development Consent DA 315-7-2003, issued by the Minister for Infrastructure, Planning and Natural Resources on 23 May 2004. The consent has since been modified four times (MOD 1 to MOD 3, and MOD 5), with a fifth modification (MOD 4) subsequently withdrawn.

Extraction activities ceased on 31 December 2024. All works since then have been directed towards site rehabilitation in accordance with the approved Rehabilitation Management Plan, Final Land Use Plan, and Mine Forward Program. A modification (MOD 6) is intended to be lodged, seeking approval to rehabilitate the quarry void through the controlled placement of non-putrescible construction and demolition material. This will enable delivery of a safe and sustainable landform which can then be developed with a similar typology to this Proposal, effectively ending the quarry's life-cycle.

1.3.2 Ferndale Industrial Precinct

The proposed development comprises Stages 2 and 3 of the broader Ferndale Industrial Precinct, as illustrated in **Figure 2**. Located at 275 Adams Road, the Ferndale Industrial Precinct will see the historic 19-hectare Luddenham Quarry transformed into an agribusiness-focused industrial hub, supporting the operations of the Western Sydney Aerotropolis. Redevelopment of the site will occur across four distinct stages, with Stage 1 currently under construction (refer to Section 1.3.2). An indicative render of the completed Ferndale Industrial Precinct is provided in **Figure 3** below.

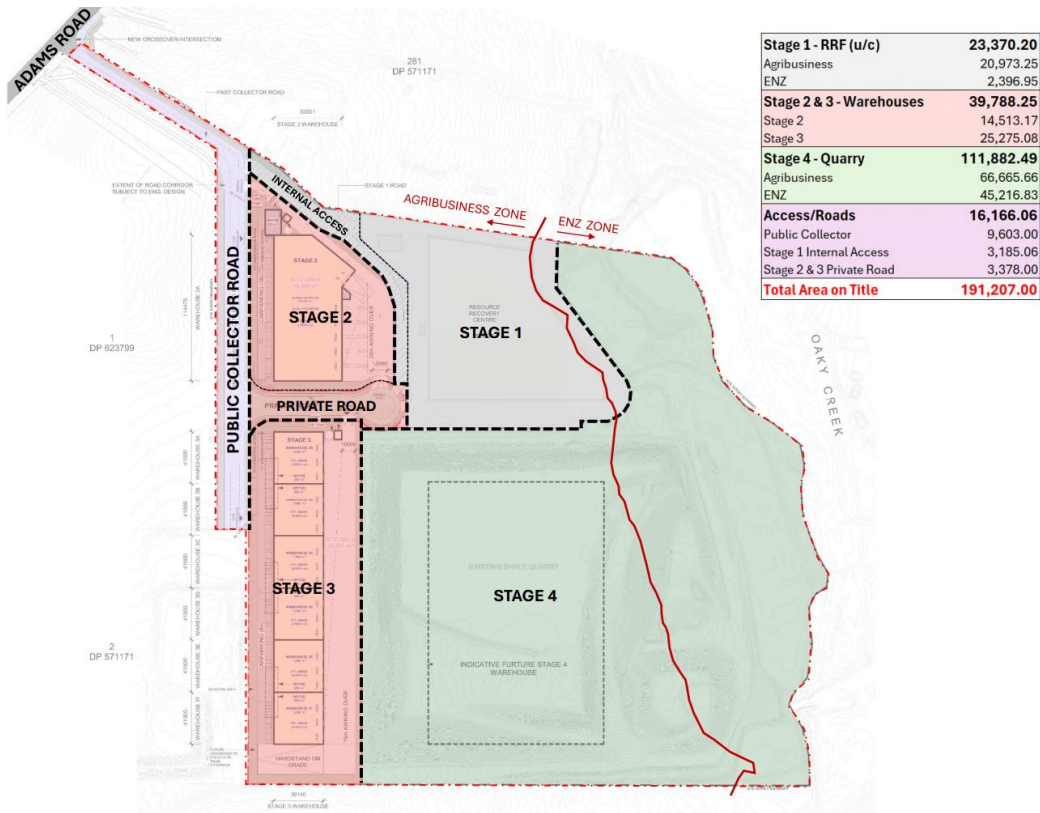


Figure 2 Ferndale Industrial Precinct proposed staging

Source: Reid Campbell

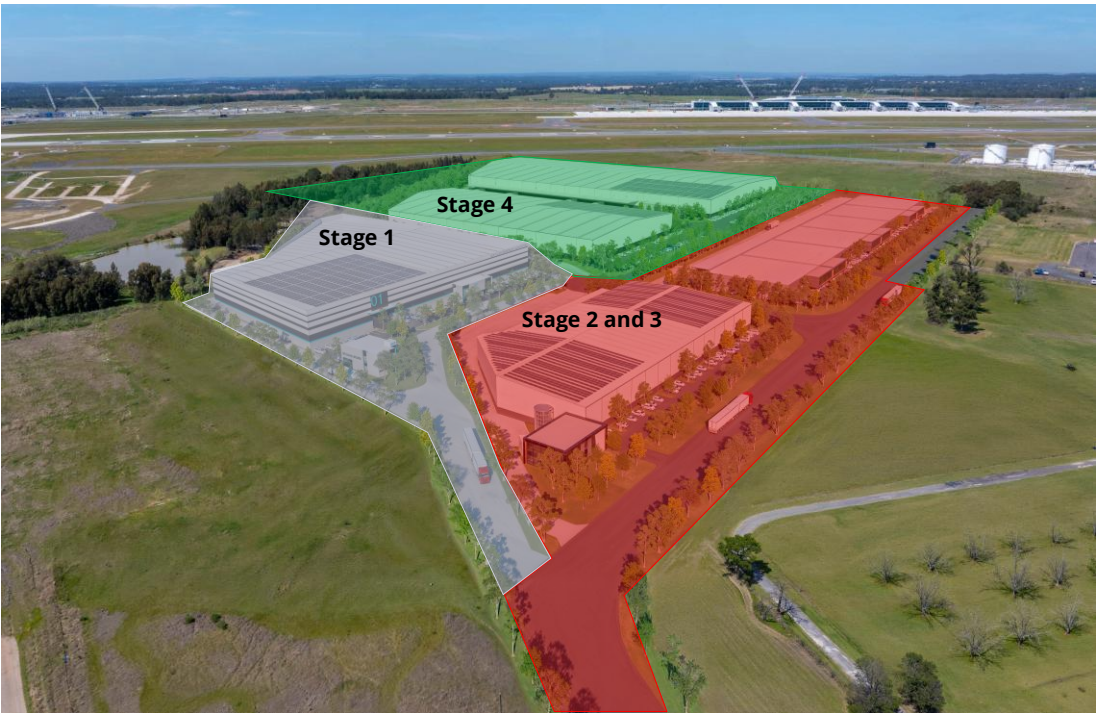


Figure 3 Ferndale Industrial Precinct – Indicative render

Source: Coombes Property Group

1.3.3 Resource Recovery Facility – Stage 1

SSD-10446 was lodged on 20 July 2020, seeking approval for the construction of an Advanced Resource Recovery Centre on the north-eastern portion of the subject site. The facility was approved to accept up to 600,000 tonnes per annum of construction and demolition waste, as well as commercial and industrial waste.

The intent of the facility is to support a sustainable and environmentally responsible approach to waste management. Recoverable materials are to be recycled for reuse, while non-recoverable materials will be repurposed to assist in filling and rehabilitating the quarry void (subject to approval of Mod 6 of DA 315-7-2003). This approach provides both a sustainable and economically viable method of delivering the final landform.

Development consent for the Resource Recovery Facility was granted on 13 August 2024, and construction is now underway. Once operational, the facility will form part of the wider Ferndale Industrial Precinct, providing ongoing waste and recycling services to support growth and development across the Western Sydney Aerotropolis. An illustration of the proposed resource recovery facility is provided below in **Figure 4**.

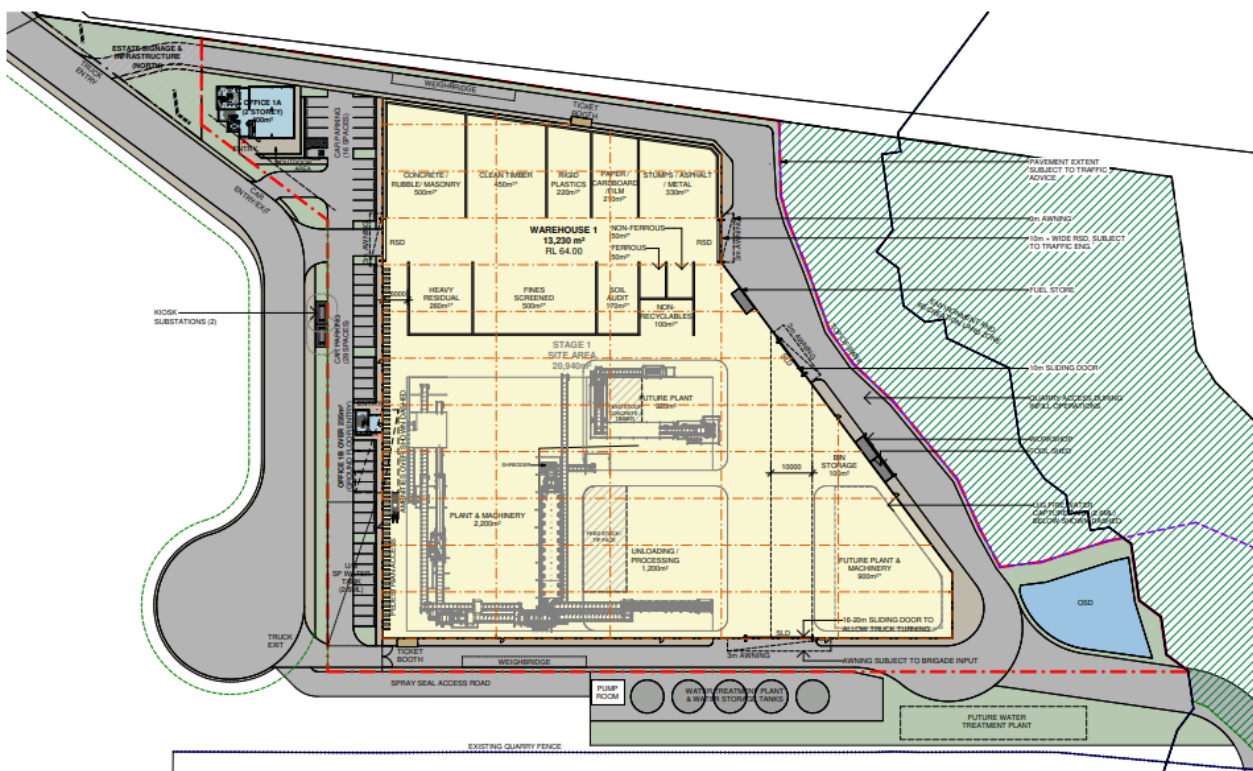


Figure 4 Resource Recovery Facility Site Plan

Source: Reid Campbell

2.0 Strategic Context

This section sets out the strategic context that is relevant to the project justification and evaluation. It is noted that these matters will be investigated in more detail in the EIS.

2.1 Project Justification

The following strategic planning documents are relevant to the proposed development and will be subject to consideration and assessment as part of the SSDA:

- *The Greater Sydney Region Plan – A Metropolis of Three Cities* prepared by the Greater Sydney Commission;
- *Our Greater Sydney 2056 – The Western City District Plan* prepared by the Greater Sydney Commission;
- *Future Transport 2056* prepared by TfNSW;
- *Western Sydney Aerotropolis Precinct Plan* prepared by the Department of Planning Housing and Infrastructure; and
- *Liverpool Local Strategic Planning Statement* prepared by Liverpool City Council;

A summary of the key strategic plans that identify the strategic context of the project is provided in **Table 2** below.

Table 2 Summary of Alignment with Key Strategic Plans

Strategic Plan / Strategy	Analysis
Greater Sydney Region Plan – A Metropolis of Three Cities	The Greater Sydney Region Plan is the overarching strategic plan that seeks to shape future development for the Sydney metropolitan area until 2056. Under the Region Plan Sydney will comprise three cities, with the site being located within the Western Parkland City. The Sites location near the WSI Airport ensures its strategic role in facilitating agribusiness development which is industrial in nature and includes employment-generating uses. By delivering well-placed industrial floor space, the proposal supports the area’s economic growth, fosters job creation, and aligns with the policy direction to strengthen Western Sydney as Australia’s economic engine. The proposed development is consistent with the following objectives of the Region Plan: • Objective 16 – Freight and logistics network is competitive and efficient - Objective 16 details the significance of Greater Sydney’s key trade gateways to underpinning the continued global competitiveness of Sydney’s supply chain operations. The proposed development will support the projected growth in transport and distribution activity principally by virtue of its location, which is poised to leverage the proximity to key freight transport corridors and trade gateways including the future WSI Airport. • Objective 23 – Industrial and urban services land is planned, retained, and managed - Objective 23 highlights the importance of retention, growth and enhancement of industrial and urban services land which should reflect the needs of the Greater Sydney Region. The proposed development will deliver an industrial estate on a site that has been determined suitable for accommodating agribusiness development which is industrial in nature in accordance with the Agribusiness zoning of the site. Given that the proposed development’s primary function is to create agribusiness related industrial employment opportunities by virtue of delivering a warehouse estate, it will contribute to underpinning the envisioned function of its locality to supporting Greater Sydney’s broader strategic vision. In addition, it is consistent with the broader strategic vision as detailed in the Region Plan, namely by building infrastructure and buildings that will facilitate growth in employment, associated economic activity and employment-based uses that will support agricultural businesses and are therefore complementary to the site context.

Strategic Plan / Strategy	Analysis
Our Greater Sydney 2056 – Western City District Plan	Our Greater Sydney 2056 – Western City District Plan (District Plan) supports the objectives of the Region Plan through detailed actions and priorities specific to each district with the site located within the Western City District. The proposed development is consistent with the following objectives of the District Plan: • Planning Priority W10 – Maximising freight and logistics opportunities and planning and managing industrial and urban land services land - The proposed development will provide substantive warehousing floorspace to support the creation of a world-class agribusiness precinct designed to support the function of the WSI Airport and the Western City District.
Future Transport 2056	Future Transport 2056 establishes the 40-year vision, directions and principles for mobility in NSW, guiding transport investment over the longer term. It was first released in 2018 and emphasises the key role transport has in supporting new economic and social opportunities, particularly supporting the development of the Western City District, the Western Sydney Aerotropolis and surrounding employment lands. The proposed development will support the initiatives to grow freight and logistics supporting the agribusiness uses within the Western City District by providing a state-of-the-art industrial estate that delivers warehousing floor space in close proximity to key freight transport corridors and trade gateways, including the new WSI Airport and M5 South Western Motorway.
Western Sydney Aerotropolis Precinct Plan	The Western Sydney Aerotropolis Precinct Plan (WSA Precinct Plan) establishes a vision, objectives and principles for the development of the Aerotropolis, a metropolitan area with infrastructure, land uses and the economy centred on the WSI Airport. The plan identifies precinct boundaries around the aerotropolis and identifies that land use zoning and objects under each precinct. The subject site is located in the Agribusiness Precinct. As such, the following Agribusiness Precinct objectives are relevant to the Ferndale Industrial Precinct. • Objective 01 - Enable fresh and value-added food production with access to local and global markets, and support Australia's value-added agribusiness export industries. - The proposed development provides modern warehouse facilities capable of being by for agricultural businesses to support their warehousing and logistics requirements. While no leasing agreements have been finalised at this stage, the warehouses will be designed to accommodate agribusiness-specific purposes, ensuring flexibility to support future value-added food production and export activities. • Objective 02 - Enable agricultural value-added industries and related freight and logistics facilities with access to the Outer Sydney Orbital and air-side access to the Western Sydney Airport. - The proposal delivers additional freight and logistics floor space consistent with the intent of the Precinct Plan. Leveraging its strategic location near WSI Airport and future freight corridors, the development will enhance connectivity to local and global markets, supporting efficient supply chains and the growth of value-added industries. • Objective 04 Preserve and enhance significant landscaped vistas within and from the Precinct towards the Blue Mountains and along Cosgroves Creek. - The proposed development seeks to deliver an environmentally sensitive built form that respects the surrounding natural landscape. A Landscape and Visual Impact Assessment will be prepared (refer to Section 6.3) to guide design outcomes, ensuring that key views towards the Blue Mountains and Cosgroves Creek are preserved and enhanced through appropriate landscape treatments and building design.

Strategic Plan / Strategy	Analysis
Liverpool Local Strategic Planning statement	The Liverpool Local Strategic Planning Statement (LSPS) – Connected Liverpool 2040 sets out Council's long-term strategy to guide sustainable growth and development across the LGA. It seeks to balance housing, employment and public services, while capitalising on Liverpool's role as a strategic centre within the Western Parkland City. The site is positioned within the emerging Agribusiness Precinct west of the WSI Airport, ensuring its potential to contribute to the delivery of Council's economic and employment objectives. The proposed development is consistent with the following LSPS planning priorities: • Planning Priority 4 – Liverpool is a leader in innovation and collaboration - The industrial estate is designed to leverage its position in the Western Sydney Aerotropolis by providing a high-quality design consistent with the outcomes intended under the WSA Precinct Plan, as such, the proposal ensures high-quality outcomes in partnership with the intended outcome for the area and the community. • Planning Priority 11 – An attractive environment for local jobs, business, tourism and investment - The introduction of modern agribusiness-related industrial facilities will attract national and international tenants, providing new job opportunities and strengthening Liverpool's position as an investment destination. • Planning Priority 12 – Industrial and employment lands meet Liverpool's future needs - The proposal directly responds to this priority by providing long-term employment land capacity, ensuring supply keeps pace with future demand. • Planning Priority 14 – Bushland and waterways are celebrated, connected, protected and enhanced - The proposed development, while adjoining Oaky Creek and its designation as ENZ – Environment and Recreation land, does not pose any negative effects or environmental risks to the waterway. Overall, the proposal is aligned with Connected Liverpool 2040, as it delivers well-located warehouses which supports sustainable economic growth, and balances urban development with community and environmental outcomes.

2.2 Key Features of the Site and Surroundings

The broader site has a total land area of approximately 19.1 hectares. The site is located within the Liverpool LGA and is subject to two separate zonings: AGB – Agribusiness and ENZ – Environment and Recreation. Currently, the site accommodates a former shale quarry in the southern portion, while the northern area is designated for a resource recovery facility, which is presently under construction. Overall, the site reflects an established quarrying operation with prepared building pads and vacant areas intended for future redevelopment.

The land to which this Scoping Report relates is located entirely within the AGB zone. Stages 2 and 3 of the Ferndale Industrial Precinct is located on a section of surplus land within the western part of the site of approximately 4 hectares. The proposed development also includes land proposed to be developed for a public collector road of approximately 1 hectare in area.

To the east, the site directly adjoins the WSI Airport, which incorporates the newly established airport and its supporting infrastructure. This designated area is separated from the subject site by Oaky Creek. To the west, the site is bordered by peri-urban and agricultural land that remains largely undeveloped under the Aerotropolis vision. This land is predominantly zoned Agribusiness and is intended to support the airport as part of the future Agribusiness Precinct.

An aerial image of the SSDA site and its immediate context is provided in **Figure 5**, with a summary of the site's key attributes and characteristics set out in **Table 3**.

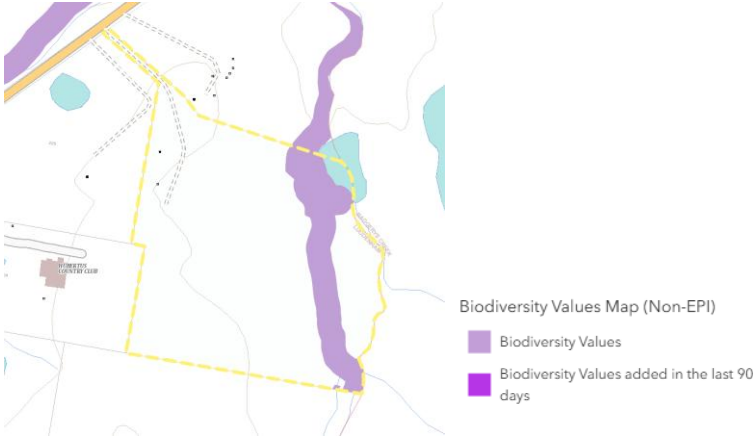
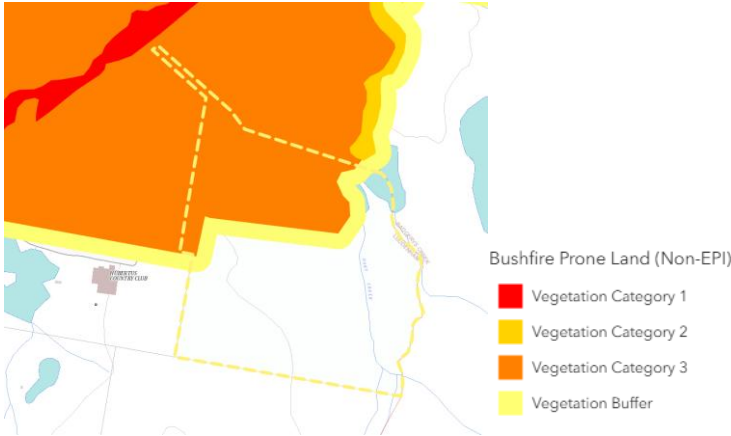


Figure 5 Site Aerial Map

Source: Nearmap, Colliers

Table 3 SSDA Site Description and Constraints

Component	Description
Site Address	275 Adams Road, Luddenham 2745
Legal Description	Part of Lot 3 DP623799
Zoning	AGB – Agribusiness
Site Area	19.1 hectares (approximately) – comprising all of Lot 3 DP623799
Development Area	Stage 2 & 3: 4 hectares (approximately) Public Collector Road: 1 hectare (approximately)
Vehicle Access	Vehicle access to the site is currently provided via a long driveway connection to Adams Road, establishing a setback of approximately 150 metres from the public streetscape (noting however that the proposal includes the construction of its respective portion of a precinct collector road along its western frontage and existing driveway). Internally, circulation is facilitated by a private road network that provides movement around the existing quarry and the resource recovery facility.
European Heritage	The site does not contain a heritage item nor is it located in a heritage conservation area.

Component	Description
Vegetation	Dense vegetation is confined to the portion of the site zoned for Environment and Recreation, primarily following the Oak Creek corridor. The remainder of the site is largely cleared of vegetation due to its active use as a quarry and construction area. A small number of trees are located along the western boundary, although these are sparse and partially degraded. The Oak creek corridor is mapped as containing significant biodiversity value.  Biodiversity Values Map (Non-EPI) - Biodiversity Values - Biodiversity Values added in the last 90 days
Bushfire	The site is partially mapped as containing Vegetation Category 3 land, with an associated vegetation buffer adjoining the mapped area. This bushfire mapping applies to the northern and eastern portions of the site.  Bushfire Prone Land (Non-EPI) - Vegetation Category 1 - Vegetation Category 2 - Vegetation Category 3 - Vegetation Buffer
Topography	The site currently contains material stockpiles in the south-western portion, which do not reflect the natural topography and will be removed prior to construction of the Ferndale Industrial Precinct. Overall, site levels vary significantly as a result of man-made modifications, including internal roads, stockpiles and earth bunds associated with historic quarrying activities.

2.3 Cumulative Impacts

The potential for cumulative impacts associated with the following projects are considered under the relevant issues in **Section 6.0** and will be assessed in the EIS. The relevant and potential future projects within the Aerotropolis are identified and summarised in **Table 4** below.

Table 4 Surrounding Future Projects

Development	Description	Address	Status
SSD-48438209 Barings Luddenham Industrial Park	Construction and operation of a warehouse and distribution estate.	2289- 2309, 2311 Elizabeth Drive, Luddenham	Approved 15/04/25
SSD-76913969 ALDI Automated Distribution Centre	Construction and operation of an automated warehouse and distribution centre	475 Badgerys Creek Road, Bradfield	Response to Submissions
SSD-64409468 Western Sydney Airport Business Park	Construction and operation of the Western Sydney Airport Business Park comprising earthworks, retaining walls, estate wide infrastructure, development of nine buildings for agribusiness uses, landscaping and riparian corridor works.	The Northern Road, Luddenham	Response to Submissions
SSD-70316465 Burrah Park	Concept proposal for an industrial warehouse and logistics estate with a Stage 1 development including bulk earthworks, road access and internal road construction, civil infrastructure and utilities, and construction and operation of 3 warehouses	1953-2109 Elizabeth Drive, Badgerys Creek	Assessment
SSD-70818708 DHL Logistics Facility, Badgerys Creek (South)	Construction and fit out of two warehouse buildings and ancillary office space, hardstand, loading docks and car parking, landscaping and signage, located within the Burra Park estate.	1287712, Elizabeth Drive, Badgerys Creek.	Response to Submissions
IPG Badgerys Creek Road Master Plan	The Master Plan includes an enterprise estate with warehouse and distribution centres, light industry, and a small-scale local centre with commercial uses, as well as open space.	475 Badgerys Creek Road, Bradfield	Approved 11/07/25
Bradfield City Centre Masterplan	Concept proposal for the Bradfield City Centre with a Stage 1 development including bulk earthworks, civil infrastructure and utilities, delivery of key roads and open space, transport infrastructure, and activation of mixed-use and enterprise parcels.	215 Badgerys Creek Road, Bradfield	Approved September 2024

3.0 Project Description

3.1 Project Details

The Applicant is seeking development consent for warehouse or distribution centres including ancillary Office premises. The proposed development, known as the Ferndale Industrial Precinct, comprises site preparation works, infrastructure works, subdivision, construction and operation of warehouse industrial buildings including ancillary office space, car parking, hardstand areas, landscaping and signage.

Specifically, this SSDA will seek consent for the following:

- Site preparation works, including demolition, clearing of existing vegetation, ground improvements, bulk earthworks and construction of retaining walls;
- Site infrastructure works, including stormwater management and site servicing infrastructure;
- Construction and operation of two (2) warehouse and distribution centres comprising:
 - A warehouse located on the northern portion of the site indicatively comprising a total GFA of 6,580m², including 6,030m² of warehouse GFA and 500m² of ancillary office GFA containing one tenancy; and
 - A warehouse located on the southern portion of the site indicatively comprising a total GFA of 10,800m², including 9,600m² of warehouse GFA and 1,200m² of ancillary office GFA across up to six different tenancies.
- Construction of a 25.6m wide Public Collector Road along the western boundary of the site;
- A Private Access Road providing connection to warehouse hardstand and manoeuvring areas;
- Hardstand areas to facilitate loading/unloading and vehicle manoeuvring;
- On-lot parking including an indicative total of 122 car parking spaces;
- Subdivision if required for the dedication of the public collector road;
- Landscaping; and
- Pylon and façade signage, including signage zones.

This Scoping Report is supported by an Indicative Site Plan prepared by Reid Campbell Architects at **Attachment A**, an extract of the proposed site plan is provided at **Figure 6** below.

The proposed warehouses will be located along the western boundary of the broader quarry site, an area currently inactive and not associated with the site's existing operations as a shale quarry or resource recovery facility. No modifications are proposed to the existing quarry under this SSDA.

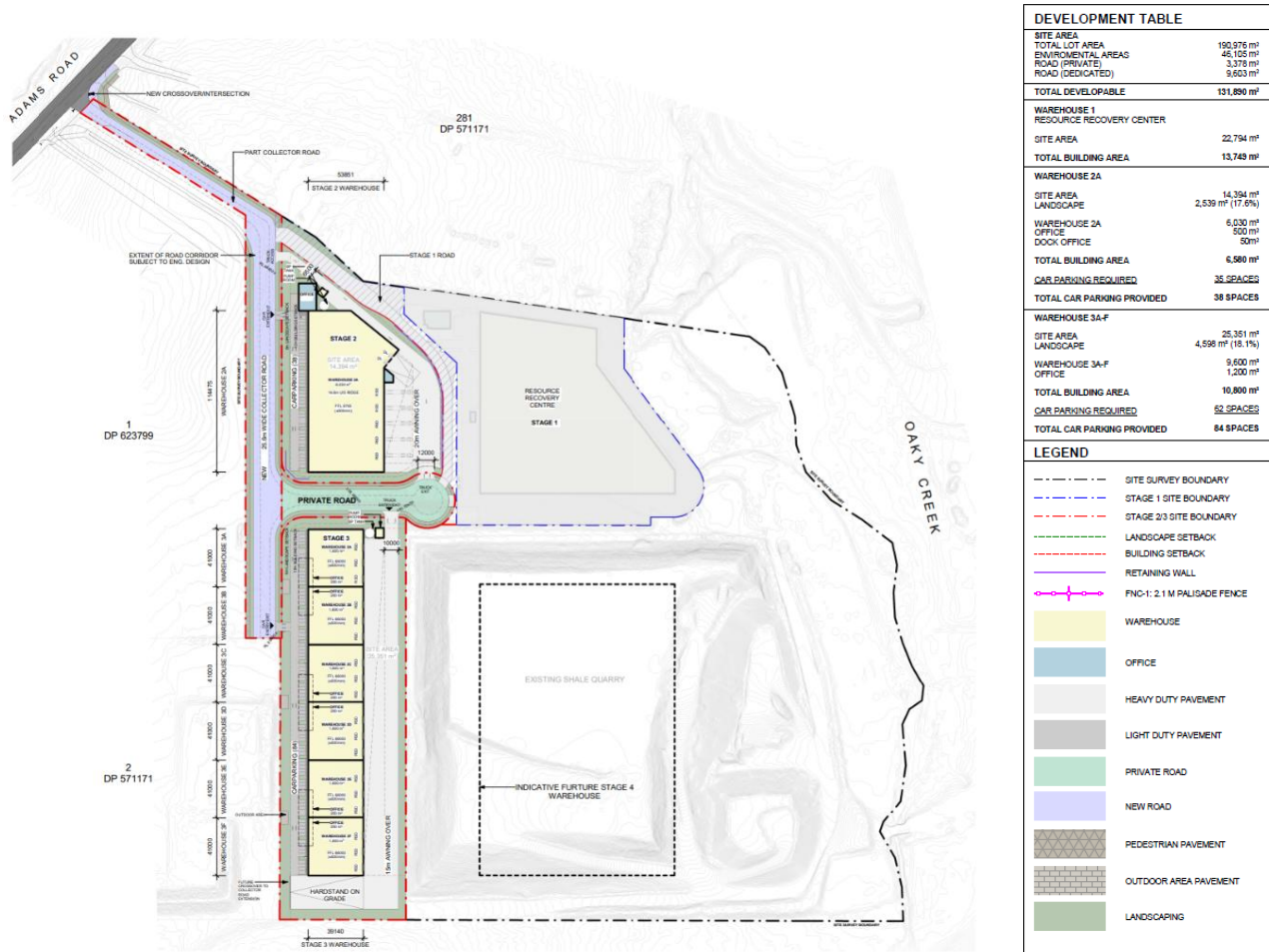


Figure 6 Proposed site plan

Source: Reid Campbell Architects

An overview of the key components of the project are described in **Table 5** below.

Table 5 Project Details

Component	Description
Stage 2 and 3 Site Area	39,749m ² (approx.)
Road Area	Approximately 1.3 hectares (3,378m ² Private Road, 9,603m ² Public Collector Road)
Land Use	Warehouse and Distribution Centres, including ancillary Office premises
Total Building Area	17,380m ²
Maximum Building Height	14.6 metres (not including rooftop plant and equipment)
Indicative Car Parking	122 spaces
Landscape Coverage	7,137m ² (18%)
Construction Hours	Standard construction hours, comprising: - Monday to Friday - 7:00am to 6:00pm; - Saturday - 8:00am to 1:00pm; and - No work on Sundays or Public Holidays.
Operational Hours	24 hours per day, 7 days per week

3.2 Estimated Development Cost

An indicative Estimated Development Cost (EDC) has been calculated by the Applicant. It is estimated that the cost of the works subject of the DA is approximately \$35 million.

3.3 Overview of Alternatives

The development of the project is driven by the focus to provide the most appropriate design response to the environmental opportunities and constraints of the site. An overview of alternatives considered is provided in **Table 6** below. The use of the site as part of an industrial logistics estate contributing to Agribusiness uses represents the highest and best use of the site, consistent with the desired future character of the area.

Table 6 *Overview of Alternatives*

Alternative	Consideration
'Do Nothing'	Retaining the site's current use as rural land adjoining an open-cut quarry would represent a significant missed opportunity, inconsistent with its intended redevelopment under the AGB – Agribusiness zoning prescribed by the WPC SEPP. The option to “do nothing” is neither realistic nor reasonable. Allowing this quarry-adjoining land to remain in its current state would ultimately leave the site without a viable use and would fail to realise its strategic role as envisioned in the WSA Precinct Plan.
Alternative Use	Utilising the site for an alternate purpose outside of industrial uses would not align with AGB – Agribusiness zoning or the objectives outlined under the Western Sydney Aerotropolis Precinct Plan. Developing the site for alternate purposes would contradict the desired outcomes, including employment generation and strategic alignment with regional agribusiness-related industrial land demand.
Delaying the Development	Delaying the redevelopment of the site would undermine the strategic intent of the Aerotropolis Precinct Plan. Deferring the development risks delaying the delivery of employment-generating land within a priority growth area. Timely progression ensures the site can enable productive use of strategically located land consistent with the Western Parkland City SEPP.

4.0 Statutory Context

A summary of the relevant statutory requirements for the project are identified in **Table 7** below.

Table 7 *Relevant Statutory Requirements*

Matter	Consideration
Power to Grant Consent	Development consent will be sought under 'Division 4.7 - Stage Significant Development' of the EP&A Act. Section 4.36(2) of the EP&A Act states that: <i>A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.</i> Schedule 1 of the Planning Systems SEPP lists development that is declared SSD. Section 29 of Schedule 1 states: 29 Development in the Western Sydney Aerotropolis <i>Development on land shown on the Land Application Map under State Environmental Planning Policy (Precincts—Western Parkland City) 2021, Chapter 4 if the proposed development—</i> <i>(a) has an estimated development cost of more than \$30 million, and</i> <i>(b) does not involve development—</i> <i>(i) prohibited under the Chapter, or</i> <i>(ii) to which that Policy, section 4.13A applies.</i> As the proposed development is located within the Western Sydney Aerotropolis and has an EDC of over \$30 million dollars, it is declared SSD. Before SSD can be determined, it is subject to a comprehensive assessment under the EP&A Act. Section 4.5 of the EP&A Act and Section 2.7 of <i>State Environmental Planning Policy (Planning Systems) 2021</i> stipulate that the consent authority is the Minister for Planning and Public Spaces (or the DPHI as their delegate) unless the development triggers the matter set out in Section 2.7(1) in which case the consent authority will be the Independent Planning Commission.
Permissibility	The proposed development constitutes <i>Warehouse and Distribution Centres, including ancillary Office premises</i> as defined under the Standard Instrument. The site is zoned AGB – Agribusiness Zone under the <i>State Environmental Planning Policy (Precincts—Western Parkland City) 2021</i>. Development for the purposes of <i>Warehouse and Distribution Centres, including ancillary Office premises</i> use is permissible with consent under the Agribusiness zone.
Other Approvals	Approvals not required for SSD, otherwise required • Fisheries Management Act 1994 – No • Heritage Act 1977 – No • National Parks and Wildlife Act 1974 – No • Rural Fires Act 1997 – No • Water Management Act 2000 – No Consistent Approvals • An approval under Section 138 of the Roads Act 1993 is required for the construction of the roads that are included as part of the Proposal. EPBC Act Approval • The Project is not likely to impact a matter of National Environmental Significance. Therefore, the Project is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies.

Matter	Consideration	
Pre-conditions to Exercise the Power to Grant Consent	State Environmental Planning Policy (Industry and Employment) 2021	Section 3.6 of the Industry and Employment SEPP stipulates that a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied that: • The signage is consistent with the objectives of the SEPP; and • The signage satisfies the assessment criteria specified in Schedule 5 of the SEPP. The proposed development will include estate signage and signage zones that are described and assessed in accordance with Section 3.6 of the Industry and Employment SEPP.
	State Environmental Planning Policy (Resilience and Hazards) 2021	Section 4.6 of the Resilience and Hazards SEPP stipulates that a consent authority must not consent to the carrying out of development unless: • It has considered whether the land is contaminated, and if the land is contaminated, it is 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. • If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose. The proposed development will include remediation to render the site suitable for the proposed uses that will be assessed in the EIS.
	State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.121 of the Transport and Infrastructure SEPP requires the consent authority to provide Transport for NSW with written notice of the development application for developments considered a 'traffic generating activity'. The proposed development is a 'traffic generating activity' as it is for a warehouse or distribution centre with a site area of more than 8,000 m².
	State Environmental Planning Policy (Sustainable Buildings) 2022	Section 3.2 of the Sustainable Buildings SEPP requires the consent authority to consider a range of sustainability and efficiency measures, and to ensure that the embodied emissions have been quantified. The SSDA will be accompanied by a NABERS Embodied Emissions Form. It is highlighted that the proposed development is not a 'large commercial development' so net-zero requirements and commitments to achieving a 5.5 Star NABERS Energy and 3 Star NABERS Water Ratings are not relevant.
Mandatory Matters for Consideration	<i>Environmental Planning and Assessment Act 1979</i>	Development in NSW is regulated pursuant to the EP&A Act, which sets out the procedures and objects for all development. Specifically, Section 1.3 of the EP&A Act sets out the objects of the Act and Section 4.15 (1) of the EP&A Act provides matters that must be considered by the consent authority in the assessment of the SSDA. The EIS will be prepared in accordance with the relevant provisions of the EP&A Act.
	<i>Environmental Planning and Assessment Regulation 2021</i>	Part 8, Divisions 2 and 5 of the EP&A Regulation sets out procedures which relate to the preparation and submission of EISs. The EIS will be prepared in accordance with Clauses 190 and 192 of Division 5 which relate to the form and content of the EIS.
	<i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>	As above. The proposed development will demonstrate it minimises waste, water and energy usage as well as contribute to the usage of renewable energy and quantify the embodied emissions attributable to the development as part of the EIS.
	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	The Resilience and Hazards SEPP applies to any proposals which fall under the policy's definition of 'potentially hazardous industry' or 'potentially offensive industry'. At this stage, it is not intended that any of the buildings at the site will provide for the storage of dangerous goods in excess of the thresholds established under the Department of Planning's guideline, 'Applying SEPP 33'.

5.0 Stakeholder Engagement

Engagement is proposed to be carried out through the preparation of the EIS prior to submission in accordance with the Undertaking Engagement Guidelines for State Significant Development (DPHI, 2024). The Applicant will engage with surrounding property owners, and may include the following activities:

- A Community Information Flyer and Invitation to meet Project Team;
- Management and co-ordination of an email address for enquiries; and
- Letterbox drop of appropriate community information package.

The Applicant will also engage with local Council, key government agencies and relevant organisations which are anticipated to include:

- Liverpool City Council;
- NSW Department of Planning, Housing and Infrastructure (DPHI);
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW), including:
 - Conservation Programs, Heritage and Regulation Group (CPHR);
 - Heritage NSW; and
 - Water Group;
- NSW Environment Protection Authority (EPA);
- Transport for NSW (TfNSW);
- NSW Department of Primary Industries (DPI);
- Sydney Water;
- Endeavour Energy;
- Fire and Rescue NSW;
- NSW Rural Fire Service;
- Workers Hubertus;
- Civil Aviation Safety Authority (CASA);
- Air Services Australia; and
- Western Sydney Airport.

The EIS will be accompanied by a Consultation Outcomes Report, which will include details of how issues raised and feedback provided during engagement activities have been considered and responded to in the development. The report will also include details of the proposed approach to future community and stakeholder engagement based on the results of consultation.

6.0 Proposed Assessment of Impacts

This section provides an overview of the key matters requiring and not requiring further assessment in the EIS and the proposed approach to assessing each of these matters. The purpose of considering these factors at this stage is to inform the preparation of the SEARs which will guide the preparation of the EIS.

6.1 Connecting with Country and Indigenous Heritage

The proposal will be informed by the Designing with Country Framework and the Recognise Country: *Guidelines for Development in the Aerotropolis*. In accordance with these documents, the assessment and design process will:

- Start with Country by promoting access to Country and ensuring the proposed developments design is developed through a process that includes Aboriginal people from the earliest stages.
- Celebrate Culture by reflecting the cultural landscape and the continuous connection of Aboriginal people to Country through:
 - the design of the public domain;
 - preservation and rehabilitation of the natural environment and systems;
 - alignment of movement networks with culturally significant spaces;
 - the design of buildings; and
 - keeping language alive in the naming of places.

An Aboriginal Cultural Heritage Assessment Report will also be prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011).

6.2 Traffic, Parking and Access

The EIS will include a quantitative traffic impact assessment prepared in accordance with relevant Transport for NSW (TfNSW) and Austroads guidelines. This assessment will:

- quantify daily and peak traffic volumes generated during construction and operation, including key access and haul routes, vehicle types and potential queuing impacts;
- assess parking demand against TfNSW and DCP parking rates;
- evaluate the impacts of development traffic on road safety and network capacity, including cumulative effects on the performance of nearby intersections, using a calibrated SIDRA model;
- consider the proposal against the planned road network upgrades identified in the Western Sydney Aerotropolis Precinct Plan;
- identify the location and implications of vehicle entry points, and demonstrate how all vehicles awaiting loading, unloading or servicing will be contained on-site to avoid queuing on public roads;
- provide details of the proposed internal road network, loading docks, pedestrian circulation and on-site parking in accordance with Australian Standards;
- include swept path diagrams for the largest vehicles anticipated to access the site, confirming safe entry, exit and manoeuvring throughout the site and at key intersections; and
- consider construction traffic management, addressing predicted construction vehicle numbers, routes, access and parking arrangements, coordination with other construction in the area, and measures to manage impacts on traffic, pedestrian and cycle networks.

The SSDA will also be required to demonstrate how the project integrates with surrounding transport infrastructure envisioned in the Aerotropolis, including the anticipated future road network and upgrades as outlined in the Aerotropolis Precinct Plan. In particular, the proposal includes the delivery of the proposed public collector road and private access road as part of the wider road hierarchy and network envisaged under the Western Sydney Aerotropolis Precinct Plan, as follows:

- The alignment of the proposed Public Collector Road has been informed by the Structure Plan prepared for the Aerotropolis (**Figure 7**) and will be delivered in accordance with the design requirements set out in the Aerotropolis

Development Control Plan. The Public Collector Road and the internal Access Road shown on the site plan are designed to connect with adjoining landowners' road networks, ensuring consistency with the Precinct Plan and supporting the delivery of the broader Aerotropolis road hierarchy.

- The southern hardstand area has been intentionally reserved to accommodate a future east–west connector road along the site’s southern boundary.
- The Private Access Road is identified as a local street under the Precinct Plan, its extension to the east is currently constrained by the quarry void. In this context, the road will undergo further design development in coordination with the street hierarchy plan once quarry rehabilitation is complete, allowing the remainder of the site to be integrated into the Ferndale Industrial Precinct at that time.

Overall, the road network identified in this Scoping Report has been structured to service the proposed development in accordance with existing infrastructure in the Agribusiness Precinct, while ensuring it can be consolidated into the broader Aerotropolis network envisioned under the WSA Precinct Plan.

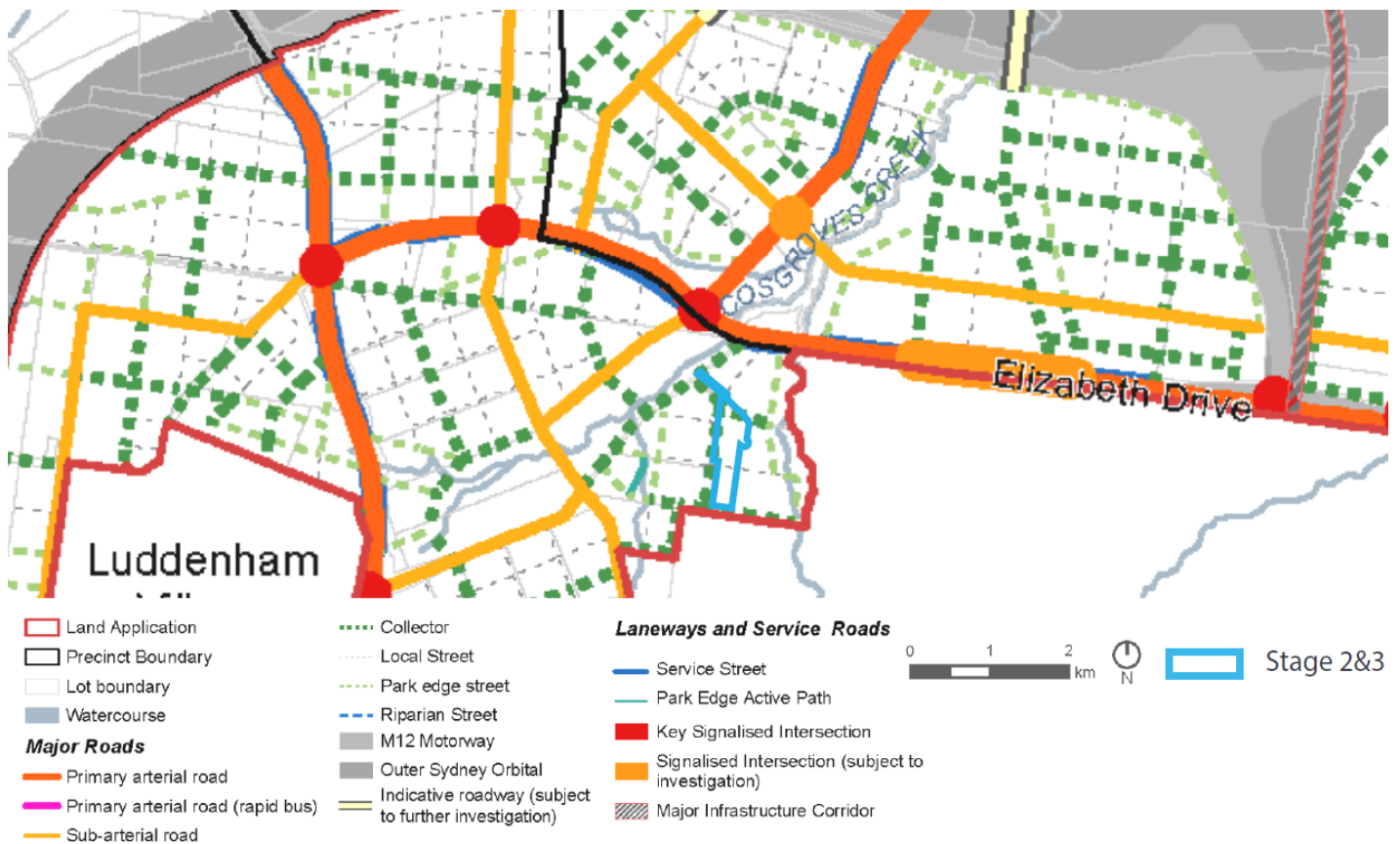


Figure 7 Proposed Street Hierarchy

Source: NSW DPHIE, edits by Colliers

6.3 Other Matters Requiring Further Assessment in EIS

A comprehensive assessment of the relevant matters and impacts which will be addressed in detail within the EIS has been undertaken. It outlines the matters and impacts of particular concern to the community and other stakeholders. These matters have been informed by the preliminary assessment of impacts undertaken in previous development applications for the site, as well as the requirements outlined under the Western Sydney Aerotropolis Precinct Plan.

Table 8 *Matters Requiring Further Assessment in the EIS*

Matter	Proposed Assessment
Built Form and Urban Design	• The SSDA will be accompanied by detailed architectural and site plans, including sections, elevations and details of materials. • The EIS will: - Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. - Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. - Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, materials, finishes, colours, any signage and integration of services. - Assess how the development complies with the relevant accessibility requirements.
Visual Impact and Signage	• The EIS will provide an assessment of the potential visual impacts of the proposed development on the amenity of the surrounding area and proposed mitigation measures. The Visual Impact Assessment will include: - Photomontages and rendered images of the proposed warehouses when viewed from public vantage points and other surrounding streetscapes. - Details including but not limited to locations, dimensions, and contents of all signage proposed for the warehouses including any illuminated signage
Trees and Landscaping	• The EIS will provide a detailed site-wide landscape plan, that: - Identifies the number and location of trees to be removed and retained, and how opportunities to retain significant trees have been explored and/or informs the plan. - Details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the area of each development site). • The EIS will demonstrate how the proposed development will: - Contribute to long term landscape setting in respect of the site and streetscape. - Mitigate the urban heat island effect and ensure appropriate comfort levels on-site. - Contribute to the objective of increased urban tree canopy cover. - Maximise opportunities for green infrastructure, consistent with Greener Places and having regard to any bush fire risk.
Ecologically Sustainable Development (ESD)	• The EIS will identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development, and demonstrate how the development has been designed to address the provisions set out in Chapter 3.2(1) of the Sustainable Buildings SEPP, including providing a NABERS Embodied Emissions Material Form to quantify the amount of embodied emissions attributable to the development.
Contamination	• EIS will be accompanied by a contamination study which will assess and quantify potential soil and groundwater contamination resulting from the site's historical quarrying activities, in accordance with the Resilience and Hazards SEPP.
Biodiversity	• The EIS will be accompanied by a BDAR that will assess the potential impacts of the proposed development on flora and fauna located on the site and include relevant mitigation measures if necessary. It is noted however that the site in which the Ferndale Industrial Estate is proposed does not contain any significant vegetation.
Air Quality	• An Air Quality Assessment in accordance with NSW Environment Protection Authority guidelines will accompany the EIS detailing any impacts caused by the construction of the development, particularly with regard to nearby sensitive receivers. • Mitigation and management measures to reduce the proposed development's impact to adverse air quality during construction will also be identified where relevant. • No assessment of operational air quality is warranted as the proposed warehouse uses do not involve any activities that involve combustion or the handling of dust-generating materials.

Matter	Proposed Assessment
Noise and Vibration	- The EIS will be accompanied by a Noise and Vibration Impact Assessment to assess the noise and vibration impacts associated with the construction and ongoing operation of the proposed development, including with regard to traffic, both individually and within the context of existing development and potential future development. - The assessment will have particular regard to surrounding land uses. - Relevant noise mitigation and management measures to reduce noise and vibration will be detailed in the assessment.
Soil and Water	- The EIS will assess potential impacts on soil resources including soil erosion, salinity and acid sulphate soils. - The EIS will provide a Surface and Groundwater Impact Assessment that includes: - A Stormwater Management Plan, with details of the onsite detention system and drainage infrastructure to demonstrate compliance with the water flow and quality requirements set out in the Aerotropolis Development Control Plan. - A description of existing groundwater and surface water conditions. - An assessment of potential surface and groundwater impacts in accordance with relevant water quality guidelines and the Department of Climate Change, Energy, the Environment and Water - Water Group (DCCEEW-Water) Groundwater Toolkit. - Details of mitigation, management and monitoring activities. - The EIS will include details for supplying potable water and disposal of wastewater including any agreements entered into with relevant authorities such as Sydney Water and Liverpool City Council.
Flood Risk	The EIS will include a flood assessment demonstrating that the site is not flood affected, and that the proposed development will not influence upstream or downstream flood behaviour.
Waste Management	The EIS will include an assessment of waste management, outlining the anticipated quantities and streams of waste generated by the proposal during construction and operation, and the intended management of waste in terms of storage, removal off-site and disposal.
Social Impact	The EIS will include a social impact assessment in accordance with the Department's Social Impact Assessment Guideline.
Infrastructure Requirements and Utilities	- The site is located within a Priority 2 area under the WSA Precinct Plan. While this means the proposal constitutes 'out-of-sequence' development, the proposal meets the requirements of Section 3.3 of the Precinct Plan as essential infrastructure and servicing can be delivered without generating additional or inefficient costs to government or utility providers. Given the site's ongoing development in relation to the Resource Recovery Facility, adequate infrastructure provision is already in place to support the delivery of the Ferndale Industrial Precinct. - The EIS will assess in detail the impact the proposed development will have on existing utility services and service provider assets surrounding the site. - The infrastructure requirements and augmentation needed (on and off site) to support the development will also be outlined and assessed in detail. This includes infrastructure and services such as water, sewage, electricity, and telecommunications infrastructure.
Bushfire Risk	The EIS will include a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection guideline.
Airspace Operation	Building heights across the Aerotropolis are guided by Obstacle Limitation Heights (OLS). The site is located within the inner horizontal surface, equating to a RL 126m. An assessment against the proposed developments interaction with airspace operation will be further assessed in the EIS.
Aboriginal Cultural Heritage	The Aerotropolis Precinct Plan identifies the site as being characterised by moderate Aboriginal Cultural Sensitivity. Further assessment will be carried out to determine the Aboriginal cultural value of the site.
Contributions	A review of the contributions payable on site in accordance with the Liverpool Aerotropolis Contributions Plan (which is levied at rate of 4.6% of estimated development cost) and the NSW Government's Housing and Productivity Contribution (which is levied at \$15 per square metre of gross floor area plus an additional \$30.83 per square metre for the strategic biodiversity component).

6.4 Matters not Requiring Further Assessment in the EIS

This section outlines the matters that are not relevant, do not require further assessment and site-specific considerations are considered necessary in the EIS. It is noted that the final deliverables will be confirmed pending the outcome of on-site investigations.

An assessment of the matters not requiring further assessment in the EIS is provided in **Table 9** below.

Table 9 Matters not Requiring Further Assessment in the EIS

Matter	Assessment
European Heritage	The subject site does not contain any heritage items and is not located within a heritage conservation area. The proposed development does not pose any environmental risk or require consideration in relation to European heritage. Accordingly, a detailed assessment of European heritage is not considered necessary.

7.0 Conclusion

This Scoping Report has been prepared by Ethos Urban on behalf of Coombes Property Group in support of the proposed development of Warehousing and Distribution Centres located on land at 275 Adams Road, Luddenham.

It seeks to inform the DPHI to enable the preparation of project-specific SEARs to enable the preparation of an EIS that will accompany a SSDA. It has outlined preliminary information regarding the project including, the site, the proposed development, relevant strategic and statutory context, and planned stakeholder engagement.

The scoping of the proposed assessment of impacts within the EIS for the industrial estate will enable the DPHI, with input from other government agencies, to prepare and issue project-specific SEARs for the project.



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