

Our ref: SSD-70817958

Mr Lloyd Henderson
Assistant Development Manager
DHL Supply Chain (Australia) Pty Limited
Rhodes Corporate Park Level 4, Building C
1 Homebush Bay Drive
RHODES NSW 2138

2 June 2025

Subject: Request for Additional Information

Dear Mr Henderson

I refer to the Department of Planning, Housing and Infrastructure's (the Department) letter of 20 May 2025, which advised the Department would be providing comments following the exhibition of the Environmental Impact Statement (EIS) for the proposed DHL Logistics Facility, Badgerys Creek (North) (SSD-70817958).

Feedback from relevant sections of the Department, including the Government Architect NSW, has been compiled and you are requested to provide a response to the issues included in **Attachment 1** to this letter as part of your submissions report.

If you have any questions, please contact David Schwebel, on 9274 6400 or via email at david.schwebel@planning.nsw.gov.au.

Yours sincerely,



Joanna Bakopanos
Acting Director
Industry Assessments

as delegate for the Planning Secretary

Attachment 1

General

- As the development is a subsequent development within the Burrah Park concept proposal, you must ensure that the proposal is consistent with the concept. Outline any updates to the development made to reflect any revisions to SSD-70316465 as part of the Submissions Report for that application. This must include updating any technical reports, plans etc. to be consistent with the assessment and recommendations of any relevant reports and plans for the concept proposal.
- Ensure the development and the concept are consistent, noting differences in GFA identified in section 4.2 of the EIS.
- The EIS and Statutory Compliance Table make references to a draft contributions plan. Ensure that any references to contributions are reflective of the contributions plans in place. Please also provide further detail about how contributions will be addressed for this development with regard to any planning agreements proposed, or contributions to be made, under SSD-70316465.

Recognise Country

- The EIS and Statutory Compliance Table do not provide a sufficient response to the *Recognise Country: Guidelines for development in the Aerotropolis* as required by section 4.28B of *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* (Western Parkland City SEPP). The Guidelines also require completion of the Recognise Country Response Template, which was not provided with the EIS.
- The Connecting with Country Report recommends ongoing consultation in relation to a number of matters. Provide further detail on how this will be implemented.
- Section 4 of the Connecting with Country Report (Appendix H) refers to the EEP site. Please ensure the report and assessment relates to this DHL proposal.

Architectural plans

- All elements of the proposed buildings should meet the setback requirements in Table 6 of the Western Sydney Aerotropolis Development Control Plan (Aerotropolis Phase 2 DCP). This includes the proposed two storey car park structures proposed for each warehouse, which are currently set back 6m from the lot boundary. It is considered that applying the relevant building setback to these structures is more appropriate given their form and their location in front of the warehouses. This would also improve the presentation of the development to the street, provide for opportunities for increased landscape screening and reduce the visual impact of having a bulky structure closer to the street than the proposed offices.

- In addition to the above, please also provide further detail on the design and embellishment of the car park structures to improve presentation to the street and integrate with the overall design of the building, with regard to section 3.3.4 of the Aerotropolis Phase 2 DCP.
- Provide details of any illumination of signage, lighting and fencing with regard to sections 3.4, 3.5 and 3.6 of the Aerotropolis Phase 2 DCP.

Landscaping

- The Aerotropolis Phase 2 DCP requires a tree canopy coverage of 25% of the site area. The development proposes a canopy cover of 16%, while the DCP Compliance Table suggests that the combined DHL North and South developments achieve a combined total of 25% - this is not accurate. The development must provide the minimum required canopy cover on lot, unless it can be demonstrated that a sufficient canopy cover strategy is in place for the Burrah Park concept that will ensure an acceptable canopy cover is achieved across the estate.
- For the landscaped area to the west of Warehouse 01, please clarify whether this will be publicly accessible and how this area will be maintained.
- Retaining walls are proposed on the northern and eastern boundaries of the site. Confirm that the proposed landscaping and areas of deep soil will be achievable in areas on or adjoining these retaining walls.
- Confirm that the ponds/waterbodies within the landscaped areas will not increase the risk of wildlife hazards, with regard to section 2.10.3 of the Aerotropolis Phase 2 DCP.

Design Excellence/Visual Impact

- Detail how the development contributes to an improved presentation to the M12, as raised by the State Design Review Panel advice for Burrah Park. Further consideration should also be given to how the design responds to views of the development from the air.
- Consideration should be given to increasing setbacks and areas of landscaping to provide more canopy cover and screening. This may also involve providing more planting instead of turfed open space in landscape areas.
- With regard to section 4.33(2)(m) of the Western Parkland City SEPP, provide further design options to differentiate the built form, landscape and character of the four warehouses (combined north and south sites) as seen during approach to the site, with consideration of providing more variation in forms, planting, and via small non-alignments.
- Investigate improvements to the connection between walkways in landscape areas and carparks, with consideration of the journey for people driving to work and parking and walking into the office, how can they move through this landscape.

Civil

- It is noted that fill is proposed along the northern site boundary and a retaining wall up to 5.6m in height. In line with the response to the Department's comments on the earthworks proposed

for Burrah Park, provide further consideration of how the level transition between the site and the lots to the north, particularly Lots 5.2 and 5.3) could be improved to reduce the level of cut and fill proposed and any resulting retaining walls.

- Any retaining walls on the site boundary, including on the northern and eastern boundaries, should be setback 2m from the boundary in accordance with section 2.18 of the Aerotropolis Phase 2 DCP.

Traffic

- Update the Transport and Accessibility Impact Assessment to reflect any revisions to the Burrah Park traffic assessment, including updated modelling assumptions and access arrangements based on feedback from TfNSW on the concept proposal. Also ensure that the report reflects the latest development proposal, for example section 2.3 refers to two access points on Elizabeth Drive, which are no longer proposed for the Burrah Park development.
- As the development is for a known tenant/operations, the assessment of trip generation should utilise the first principles method in the Guide to Transport Impact Assessment (TfNSW 2024).
- The swept path for the Warehouse 1 and 2 shared truck entry/exit driveway (Drawing no. 300303581-02-11) shows B-Doubles entering the site crossing over to the eastern side of the driveway, which would conflict with vehicles exiting the site on that side of the driveway. Clarify how this will be managed or revise the design of this access arrangement.

Noise

- As noted previously, the noise impact assessment (NIA) prepared by SLR has been undertaken without regard to the noise assessment provided for the Burrah Park development prepared by EMM. This DHL application is subject to the Burrah Park concept proposal, which, if approved, will set noise limits and conditions for the whole concept that will need to be addressed by subsequent development applications (including this application). Accordingly, should the noise assessment be accepted as sufficient for the Burrah Park concept, the noise assessment for the DHL application will need to demonstrate how it is consistent with the assessment and noise limits applied to the concept.
- As the land in NCA01 has retained the C4 Environmental Living zoning, it would be more appropriate to apply the rural amenity classification (as identified in Table 11 of the NIA) for both current and future scenarios.
- Clarify the source of the vehicle traffic data in Table 23 of the NIA and confirm it is consistent with the traffic generation identified in the Transport and Accessibility Impact Assessment.
- Confirm whether the operational noise assessment considered the shielding influence of the super awning between Warehouses 1 and 2.

- Confirm whether the operational noise assessment considered noise generated by side unloading of B-Doubles on the hardstand areas (i.e. not in loading bays), as identified in section 4.2 of the Transport and Accessibility Impact Assessment.

Hazards

- Please provide information on any dangerous goods proposed for storage in Warehouse 2.
- The Dangerous Goods Report references aerosol cages in both Bunker No.1 and Bunker No.2. Please confirm which bunker is intended for aerosol storage.
- Given the speculative nature of flammable liquid storage and the potential variation in storage and fire protection configurations, the Preliminary Hazard Analysis (PHA) should be updated to assess a credible worst-case scenario. This assessment should consider the types of flammable liquids and packaging expected for speculative storage. The update must also address:
 - The use of racked versus palletised storage
 - The feasibility and effectiveness of fire control using sprinklers
 - The potential extent of fire and the area likely to be involved, and
 - The type of suppression media required to effectively manage a fire involving the stored materials.
- If restrictions are proposed based on the characteristics of flammable liquids or their packaging (e.g. size or material), these must be clearly specified and applied consistently across the PHA and all supporting documentation.
- If aerosols are to be stored in the same bunker as flammable liquids, further justification must be provided to demonstrate that fire propagation from one storage area to another would not result in a significant increase in overall risk. This justification should consider the potential effects of radiant heat transfer between storage zones and the risk of flammable liquid pooling and spreading to the aerosol storage area.
- Section 4.8 of the PHA states that the potential for toxic smoke is considered negligible in comparison to a standard warehouse fire. Please provide further justification for this assessment.
- Section 5.2 and Appendix B of the PHA present a consequence analysis for a fire in Bunker No.1. The Department requests additional information on the assumptions and modelling inputs used in this analysis, including (but not limited to) wind speed and direction, flame height, elevation, and surface heat flux.
- In light of the speculative nature of the flammable liquid storage and the identified credible worst-case scenario, the frequency analysis presented in Section 6.3 of the PHA should be re-evaluated based on the likely effectiveness of the sprinkler system. This re-evaluation should also consider the relevant risk criteria associated with adjacent land uses.

Aviation

- Section 4 and Table 1 of the Aviation Impact Assessment is incomplete.

Contamination

- It is noted that the EIS is supported by a Detailed Site Investigation, Remedial Action Plan, Supplementary Contamination Investigation and Summary of Contamination and Remediation, which make recommendations on the required remediation of the site. Please confirm if this will be necessary given the site-wide earthworks and remediation proposed under the Burrah Park Stage 1 works that seek to make the site suitable for industrial use.

Air Quality

- Section 7.0 of the Air Quality Impact Assessment states that details of operational activities are unknown. However, as the Applicant will occupy and operate the development, this information should be available and incorporated into the assessment. Similarly, Section 8.3.2 is based on speculative traffic generation, but the detailed traffic movements and vehicle types should be obtained from the Applicant and used in the assessment.

ESD

- Review the Net Zero Statement at Appendix C of the Sustainability Management Plan to ensure it provides the details required by Planning Circular PS23-001 and the Net Zero Statement Technical Note.
- Provide further detail on how the development responds to the objectives and performance outcome of Section 2.12 of the Aerotropolis Phase 2 DCP in relation to energy supply and net zero emissions.
- Section 4.7 of the Western Sydney Aerotropolis Precinct Plan requires development to target 6+ Green Star rating from 2026. Identify how this will be achieved for the development.