



24 December 2025

Ms Joanna Bakopanos
A/Director Industry Assessments
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Jo,

WESTERN SYDNEY AIRPORT BUSINESS PARK (SSD-64409468), 2422-2430 THE NORTHERN ROAD, LUDDENHAM – REQUEST FOR INFORMATION

1.0 Introduction

WSABP Management Pty Limited (WSABP Management) is proposing to develop the Western Sydney Airport Business Park (WSABP), a world-class business park on a key site adjacent to the Western Sydney Airport, within the Agribusiness Precinct of the Western Sydney Aerotropolis, in the Liverpool local government area (LGA).

The WSABP site has been identified as a key location for an Integrated Logistics Hub Airfreight Interface (ILHAI) to serve the Western Sydney Airport. This hub aims to provide a world-class airfreight service, facilitating efficient 'paddock to plate' distribution from Australian producers to global markets.

The proposed development is described in the Environmental Impact Statement (EIS) for the proposal prepared by PJEP Environmental Planning Pty Ltd (PJEP), dated October 2024. The EIS was publicly exhibited by the Department of Planning, Housing and Infrastructure (DPHI, the Department) from 8 November to 5 December 2024.

On 19 December 2024, the Department requested additional information following its review of the EIS and in response to the submissions received during public exhibition of the EIS. A Response to Submissions and Amendment Report (Amendment Report) was provided by WSABP Management on 3 September 2025.

The key components of the WSABP as outlined in the Amendment Report include:

- site subdivision;
- demolition, vegetation clearing and earthworks;
- construction of estate roads and associated intersections, including an access road on a neighbouring lot (Lot 40¹ in DP1311162) and roundabout intersection with Adams Road;
- construction and operation of 12 warehouse and distribution facilities and café with a total building area of approximately 262,291m²;
- restoration and enhancement of the Cosgroves Creek riparian corridor, to provide approximately 14.3 hectares of environmental, cultural and recreation open space; and
- ancillary development including car parking, infrastructure provision and landscaping.

The proposal constitutes 'State Significant Development' under the *Environmental Planning and Assessment Act 1979* (EP&A Act), and consequently the Minister for Planning and Public Spaces is the consent authority for the development.

¹ previously Lot 30 in DP1251450



2.0 Response to Issues Raised

The Department sought advice from government authorities on the Amendment Report and received responses from:

- Liverpool City Council (Council);
- Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water;
- Conservation Programs, Heritage and Regulation within DCCEEW (CPHR);
- Endeavour Energy;
- Heritage NSW² within DCCEEW;
- Fire and Rescue NSW;
- Sydney Water;
- Transport for NSW (TfNSW);
- TfNSW - Sydney Metro;
- Bradfield Development Authority (BDA); and
- Civil Aviation Safety Authority (CASA).

Residual matters were raised by Council, DCCEEW Water, CPHR, Heritage NSW and Sydney Water. The other authorities have advised that the Amendment Report addressed their comments on the proposed development raised during the exhibition of the EIS and recommended conditions or had no further comments.

A response to the residual matters is provided below.

3.0 Response to Residual Matters

Liverpool City Council

A response to the residual matters raised by Council is provided in **Attachment A** to this letter.

DCCEEW Water

Comment:

Quantify the maximum annual volume of water take due to aquifer interference activities and demonstrate the ability to acquire sufficient water entitlement unless an exemption applies.

Response:

A response to the residual matters raised by DCCEEW Water has been prepared by Douglas Partners, provided in **Attachment B** to this letter. The Douglas Partners' response notes that previous investigations and the site's geological setting suggests that the regional groundwater table is likely to be deep and substantial interception of the groundwater source is unlikely.

To understand the site's groundwater conditions, two monitoring wells have been installed at the site in locations relating to maximum cut. In both monitoring wells groundwater was encountered at depths below the maximum proposed excavation depth. In addition hydraulic conductivity testing was undertaken which indicated low conductivity, further reducing the likelihood of groundwater inflow. Monitoring of the wells will continue to establish a baseline and enable prediction of temporal variation.

The Douglas Partners advice further notes that it is highly unlikely that any long term inflows would exceed the rates that trigger the requirement for a water access license.

² Separate advice received from Heritage NSW on Aboriginal heritage and historical heritage.



DCCEEW - CPHR

Comment:

CPHR noted slight encroachments of the proposed stormwater detention basins into avoided land identified in the Cumberland Plain Conservation Plan. CPHR recommended that plans and documents are amended to ensure all works associated with the basins and Local Road 1 are wholly outside the avoided land corridor.

Response:

WSABP Management has revised the design of the proposed stormwater detention basins in consultation with Sydney Water to ensure the basins do not encroach into avoided land and are wholly located in urban capable land. A revised civil engineering report and associated plans are provided in **Attachment C** to this letter, with an updated Biodiversity Development Assessment Report provided in **Attachment D**. WSABP Management has also updated the corresponding Riparian Assessment to reflect the change in basin designs and reduced impact on the riparian zone (**Attachment P**),

Comment:

CPHR sought details of consultation with Sydney Water regarding the proposed stormwater management and recycled water system to confirm the objectives of the Wianamatta South Creek stormwater management targets (DPE, 2022) can be achieved.

Response:

Advice from Sydney Water confirming its position on the proposed stormwater system is provided in **Attachment E** to this letter. This advice confirms that potable water supply can be extended from existing mains in Adams Road and eventually be supplied with recycled water from the Upper South Creek AWRC (anticipated to be in operation by 2031).

Comment:

CPHR recommended that revised stormwater modelling and designs are provided to demonstrate compliance with the Wianamatta South Creek stormwater management targets (DPE, 2022).

Response:

Updated stormwater modelling and basin designs have been prepared by Costin Roe in consultation with Sydney Water and are included in **Attachment C** to this letter.

Comment:

CPHR recommended that the Erosion and Sediment Control Plan (ESCP) be reviewed and updated to include any amendments required to be made to the proposed new stormwater management system.

Response:

An updated ESCP prepared by Costin Roe is included in **Attachment C** to this letter.



Heritage NSW – Historic Heritage

Comment:

Heritage NSW recommended that the Historical Archaeological Assessment (HAA) include further consideration of areas 5, 6 and 7 in Figure 5.1 of the HAA, including consideration of the potential for deeper archaeological deposits and the potential connection between the Hughes family and Waters and McHony farms.

Response:

Further consideration of these areas is provided in the updated HAA prepared by EMM included as **Attachment F** to this letter.

The updated HAA notes there is moderate potential for subsurface resources in these areas, with high potential in Cosgroves Creek due to the likely relocation of these structures, as indicated by the presence of the timber piers, and recommends management measures to apply to the project.

Comment:

Heritage NSW recommended the following additional measures are incorporated into the Historic Heritage Management Plan (HHMP), to be implemented following approval:

- a methodology for demolition of the dairy cottage to identify and salvage significant fabric; and
- a methodology for salvage, storage and reuse of significant fabric, including the consideration of use in conservation works at other sites.

Response:

These measures have been addressed in the response provided by EMM in the memorandum dated 28 November 2025 included in **Attachment G** to this letter.

This notes that the creamery is in suitable condition for dismantling and salvage, subject to the preparation of a dismantling methodology by a suitably qualified heritage and conservation specialist.

Prior to commencing demolition of these buildings, WSABP Management will prepare a salvage methodology and catalogue consistent with the NSW Heritage Office's *Movable Heritage Principles* (2000) and Burra Charter Article 27 (Australia ICOMOS 2013).

Comment:

Heritage NSW recommended the following options for interpretation are considered for integration into the project:

- integration of murals or façade based art into warehouse elevations;
- interpretation of the dairy farm buildings in concrete paving between Warehouses 10 and 11;
- relocating the creamery as a whole building to Warehouse 12 or other publicly accessible area in the vicinity; and
- opportunities for the interpretation of archaeological remains from the site.



Response:

A response to the matters raised by Heritage NSW regarding historic heritage is provided in **Attachment G**. This response notes:

- WSABP Management has considered the use of murals on warehouse facades facing The Northern Road, and is proposing articulation on facades as shown in the revised architectural plans in **Attachment H** and landscape screening;
- interpretation of the footprints of the dairy farm structures in concrete paving between Warehouses 10 and 11 was considered, however the location of the footprint within the hardstand would prevent public access;
- relocation of the creamery fabric is proposed in the HIS in **Attachment G** (s2.4.2) for reuse as a picnic shelter in the landscaped areas; and
- interpretation of archaeological remains is included in the updated HIS In **Attachment G**.

Heritage NSW – Aboriginal Cultural Heritage

Comment:

Please provide mapping of the likely locations of the proposed phase one salvage methodology and test excavation units that require salvage and expansion.

Response:

The locations of salvage excavation are provided in an updated Figure 11 in the revised ACHAR prepared by Kelleher Nightingale in **Attachment I** to this letter.

Comment:

Provide additional information on survey undertaken between Adams Road and Warehouse 12.

Response:

Further discussion about survey coverage in this area is provided in section 4.2 of the revised ACHAR prepared by Kelleher Nightingale in **Attachment I** to this letter.

The surveys were carried out in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010).

Comment:

Heritage NSW recommends that an additional research question is included in the proposed salvage methodology to characterise the nature and extent of the archaeological resource contained within each subsurface site and how these deposits and sites are related (or not).

Response:

The requested additional research question has been added to the salvage excavation methodology in Appendix C of the revised ACHAR in **Attachment I**.



Comment:

Heritage NSW recommends that the Aboriginal Cultural Heritage Management Plan (ACHMP) include information on the proposed artefact recording requirements and ensure that they align with those recorded during the test excavations.

Response:

The heritage management plan in Section 11 of the revised ACHAR in **Attachment I** and was updated to include the recommended measures.

Sydney Water

Comment:

Sydney Water advised that it did not endorse the designs submitted with the Amendment Report and requested further information to demonstrate alignment with Sydney Water's Stormwater Scheme Plan.

Response:

WSABP Management has revised the design of the proposed stormwater detention basins in consultation with Sydney Water to ensure the basins align with Sydney Water's Scheme Plan. A revised civil engineering report and associated plans are provided in **Attachment C** to this letter. Advice from Sydney Water confirming its position on the proposed stormwater system is provided in **Attachment E** to this letter.

4.0 Closure

WSABP Management and PJEP trust that the information provided in this additional information adequately addresses the issues raised in response to the Amendment Report and enables the Department to finalise its assessment of the application.

WSABP Management would appreciate the ability to review proposed draft conditions at the earliest opportunity.

Should you have any enquiries in relation to this matter, please do not hesitate to contact me on 0434 967 285.

Yours faithfully,

PJEP – Environmental Planning

Kane Winwood

Principal Environmental Planner



Attachments:

Attachment A	Response to Liverpool Council Residual Matters
Attachment B	Response to DCCEEW Water Residual Matters – Douglas Partners
Attachment C	Revised Civil Engineering Plans and Report, including stormwater modelling and ESCP
Attachment D	Revised Biodiversity Development Assessment Report
Attachment E	Sydney Water Section 73 advice
Attachment F	Revised Historical Archaeological Assessment
Attachment G	Revised Heritage Interpretation Strategy and response to Heritage NSW and Council comments
Attachment H	Revised Architectural Plans
Attachment I	Revised Aboriginal Cultural Heritage Assessment
Attachment J	Revised Landscape Plans
Attachment K	Revised Recognise Country Response Template
Attachment L	Revised Estimated Development Cost Report
Attachment M	Revised Flood Impact Risk Assessment and plans
Attachment N	Massing Diagrams
Attachment O	Revised Biodiversity Management Plan
Attachment P	Revised Riparian Assessment
Attachment Q	Revised Bushfire Protection Assessment
Attachment R	Revised Vegetation Management Plan



ATTACHMENT A



Table A.1: Response to Liverpool Council Residual Matters

Comment		Response
1. Strategic Planning		
Anton Road	Significant battering for the Anton Road extension is located on the eastern boundary of the site and a portion of the Anton Road extension traverses the south-east boundary of the site (see General Arrangement Plan, Drawing No CO15092.00-SSDA150, Issue C, Dated 08.08.25, prepared by Costin Roe Consulting). On this basis the proposal impacts on the future design and provision of Anton Road and consideration in relation to provision of the road must be considered.	There are no plans for battering outside of the site boundary. The only section of the future Anton Road reserve into the site is only located in the Cosgroves Creek riparian corridor on Lot 3 DP 1240511, is a small portion of the total road area (2,816 m² or approximately 4.6%), does not affect access to or from any the warehouse lots, and is not contiguous with any proposed development. The proposed layout of major roads in the WSABP aligns absolutely with the approved Precinct Plan. The only deviations occur at intersections where engineering standards require that road junctions on the Precinct Plan are perpendicular for safety and functionality. The proposed estate road layout includes the provision for a future intersection with Anton Road extension at the turnaround on Collector Road 2. WSABP Management would dedicate this land to the relevant roads authority once the road extension layout is designed and the actual encroachment into the site is known.
	Portions of the Anton Road corridor (either road or batter supporting road) is located on the site (see General Arrangement Plan, Drawing No CO15092.00-SSDA150, Issue C, Dated 08.08.25, prepared by Costin Roe Consulting). It is further noted that Anton Road is identified under the WSAPP as a “sub-arterial road” which has a road reserve width of 40m.	There are no plans for batter support outside of the site boundary. The proposed road network can fully accommodate the traffic demands of the proposed development without reliance on the Anton Road extension. The traffic assessment demonstrated that the internal road network as



Comment		Response
	On this basis at the eastern boundary of the site adjacent to proposed “Collector Road 2” approximately 7.6m of the Anton Road reserve is located within the subject site. At this point an intersection design would likely result in further intrusion into the subject site. In addition to this at the south east boundary of the site, the SEPP mapping identifies that approximately 22.88m of the 40m Anton Road reserve is located within the subject site. As such, Council again requests that the proponent arrange for the design and construction of Anton Road for the full extent of the eastern boundary of the site to a new intersection with Adams Road.	designed provides sufficient capacity and connectivity to support the development independently, at full operational capacity. Therefore, construction of the Anton Road extension is not required to facilitate the operation of the WSABP, as all traffic can enter and leave the site via the new intersection with Adams Road. Further, the majority of the future Anton Road extension is located on adjoining properties that are not owned by the landowner of the WSABP site, other than the small section noted above. WSABP notes that it does not have the pathway to compulsorily acquire neighbouring owners’ land. The above responses address the further comments in Council’s advice that refer to the construction of the Anton Road extension and new intersection with Adams Road.
Naturalised Channel	The provision of a naturalized channel for the >15 hectare catchment for the north-south running watercourse is again requested.	Sydney Water has confirmed that this channel is being removed in the updated Scheme Plan, as detailed in their updated Scheme Plan map included in their submission dated 12 December 2025. As discussed in the Amendment Report, the provision of a naturalised channel would require significant drainage infrastructure and require ongoing maintenance. The water quality and flow objectives for Cosgroves Creek can be achieved with the proposed stormwater management system.
Connection to Country	The proponent and DPHI should note that the NSW Land and Environment Court has produced case law in relation to the interpretation of connection to country within the Western Sydney Aerotropolis. It is recommended that sufficient information is lodged for assessment in	As noted in the EIS and Amendment Report, the design of the proposed development has followed the Recognise Country guidelines and been developed in consultation with Aboriginal knowledge holders.



Comment	Response
accordance with the Commissioners decision in 170 Willmington Road Pty Ltd v Liverpool City Council [2025] NSWLEC 1600, see: https://www.caselaw.nsw.gov.au/decision/198c6047a6d17e509a07a439	Further consultation has occurred since the lodgement of the Amendment Report in the development of the Heritage Interpretation Strategy for the proposal (see Attachment G). A response to the key elements of Country in relation to the guidelines is provided below: Cultural safety As noted in the response provided in Attachment G, cultural safety is an important consideration and how this will be adopted for the WSABP will be discussed with Aboriginal stakeholders during development of the Heritage Interpretation Plan. To ensure cultural safety is maintained, the proposed development of the public domain and landscaping within the site has been guided by discussions with Aboriginal knowledge holders and these discussions will continue through the implementation of the Heritage Interpretation Plan, including detailed design of site landscaping and the yarning circle, place naming and signage, and heritage displays within the site café. Meaningful engagement Ongoing consultation with Aboriginal people has continued as WSABP Management develops the design of the estate and this will continue as the development of the estate progresses. The revised Heritage Interpretation Strategy at Attachment G and revised ACHAR in Attachment I includes a summary of consultation, including an additional focus group meeting held in September 2025 to discuss the proposed development.



Comment	Response
	<i>Economic development opportunities</i> WSABP Management is investigating opportunities to facilitate First Nations economic development through initiatives such as apprenticeship programs, use of local First Nations businesses and working with organisations to contribute towards or provide training and career development opportunities. <i>Cultural values and heritage</i> The WSABP SSD application is supported by an ACHAR prepared in accordance with the applicable guidelines. This includes recommendations to undertake further investigations, salvage excavation and collection of sites prior to and during initial earthworks, overseen by Aboriginal site officers. <i>Cultural landscape</i> The Heritage Interpretation Strategy in Attachment G (section 2.4.1) outlines multiple approaches to incorporate cultural principles in site landscaping, including use of native plants of cultural significance, a yarning circle to promote storytelling, visual art and signage. These would be further developed in consultation with the key Aboriginal knowledge holders as noted in the Heritage Interpretation Strategy. <i>Built form</i> The layout and built form of the proposed development has incorporated the input of Aboriginal stakeholders through alignment with the site topography, acknowledging the importance of water in the landscape and sight lines towards the Blue Mountains.



Comment	Response
Zone Objectives It is incumbent on future tenants to demonstrate through a suitable application process that the proposed use is both permissible and achieves the objectives of the zone. A SSDA is not the appropriate assessment pathway for a first use or change of use application. As such it is further requested that building uses within the proposal are regulated by future development applications and that this is required by a relevantly worded condition of any future SSDA consent. This response does not provide sufficient evidence to indicate that the proposal is in accordance with the objectives of the ENZ Zone. Significant earthworks, basin drainage works and civil works are proposed within the ENZ Zone which will require the removal of existing significant trees and vegetation, especially in the south-western part of the site where the northern tributary of Cosgroves Creek meets the Northern Road. Additionally, both the Ecological Report and the Vegetation Management Plan identify significant areas where ENZ and riparian corridor land is	<i>Language and naming places</i> As noted in the memorandum in response to Heritage NSW and Council comments on the Heritage Interpretation Strategy in Attachment G, WSABP Management proposes to coordinate with RAPs, knowledge holders and relevant stakeholders to develop Aboriginal-led interpretive content and oversee Aboriginal cultural heritage salvage excavations, in line with <i>Ask First and We're Dreaming Country</i>. The Heritage Interpretation Strategy includes measures to incorporate traditional language in landscaping, interpretive panels, wayfinding signage and acknowledgement of Country signage. The proposed development is for a warehouse and distribution centre which is permissible under the AGB zone. No change of use, or a use that is not permissible within the AGB zone, is suggested or proposed by the SSD application. Roads and drainage works are permissible in the ENZ zone, therefore associated earthworks, drainage and civil works are permissible. The revised Biodiversity Assessment in Attachment D demonstrates that the vegetation to be cleared within the ENZ zone is not native vegetation and there are no impacts on avoided land under the CPCP.



Comment	Response
	being removed for warehouse development. Council recommends that the proponent review these issues and amend both the proposed plans and supporting information to demonstrate compliance with the ENZ Objectives.
Arborists Report	The Arboricultural report does not appear to assess trees within the ENZ and Riparian area that are impacted by basin construction, road construction and associated earthworks. It is requested that an addendum is provided to include this assessment. Appendix D of the Arboricultural Development Impact Assessment Report (Attachment L of the Amendment Report) clearly indicates that no trees are to be cleared within the ENZ and riparian zone.
Vegetation Management Plan	It is requested that the VMP is amended in relation to any final civil plans, noting Council's request for the naturalization of the north-south Strahler order 1 stream with a contributing catchment of >15 hectares. These naturalization works must be included in the VMP. As noted above, the provision of a naturalised channel at this location is not proposed.
Creek Crossings	The WSAPP is silent in relation to road crossings of watercourses. The S7.12 Contributions plan identifies the proposed road access to the site from Adams Road as being excluded from the plan. As such culverts identified in the mapping are indicative only. The proposed cycle and pedestrian network provides a connection between The Northern Road and roads within the estate, and would facilitate access to the riparian area. Council would consider the use of culverts if the road design achieved the following: Linear access along the riparian area from the Northern Road to the Eastern Boundary of the site with appropriate road gradients and supporting batters to permit pedestrians and cyclists to intersect with on road cycleways on park edge roads consistent with Figure 9 of the WSAPP (July 2025). This would require redesign of both the park edge roads and the proposed road access to the site from Adams Road to detail both on road and open space active transport links in accordance with the WSAPP. At present the civil plans do not detail the provision of required active transport links and the design and gradients proposed do not allow for the provision of these links. This outcome is not supported. It is noted that the Precinct Plan shows the primary east-west active transport paths are located to the south of Cosgroves Creek, in the planned open space area within Lot 30, to the south of the site. The future network would be able to connect with the proposed network in the WSABP. The revised Landscape Plans in Attachment J include an updated plan showing the active transport network through the site. WSABP Management originally considered shared paths in accordance with the Precinct Plan alignment, however these paths would have crossed the riparian corridor and encroached on Avoided Land. Consequently, the shared paths have been relocated to ensure the development does not encroach Avoided Land.



Comment		Response
		Instead, WSABP Management has sought to connect each of these locations with the best route possible that provides the same connectivity. See the revised Architectural plans in Attachment H (plan A00106) for the proposed connectivity. It is noted that the culvert crossing of The Northern Road does not facilitate the construction of a shared path, therefore access to and from the site would need to be via The Northern Road.
Clearing of native vegetation	Noted, it is requested that an addendum to the Salinity investigation is prepared in relation to the current and any future amended civil plans (noting that the Salinity investigation has been prepared in relation to plans dated 11 July 2022, see “Preliminary Salinity Investigation and Management Plan,” Project 221907.01.R.002.Rev0, August 2023, prepared by Douglas Partners). It is further requested that the Salinity and Management Plan is reworded so as to include clear and enforceable controls noting of the 8 management strategies listed in points A to H all use words like “should,” “when possible,” “where possible,” “where appropriate” etc. Council requests that the Salinity Management Plan is amended to provide clear conditions for development that will ensure salinity is managed on site. Council will not agree to the future handover of any roads unless this requirement is met.	The findings and measures of the salinity investigation are still relevant for the revised development layout, noting the revisions do not warrant an update to this report. WSABP Management intends to implement the measures outlined in the Salinity Management Plan based on the site conditions.
Design excellence	A review of the NSW Government Architect comment notes that Council concerns in relation to pedestrian and cyclist access from the park edge street and bridges crossing Cosgroves Creek and its tributary are shared. Council would also note that general concerns relating to earthworks are shared by Council.	The comments of the State Design Review Panel were incorporated into the proposed development.



Comment		Response
Water supply	Confirm potable water supply to the site is available	The proposed development includes infrastructure to extend and connect with Sydney Water's potable water supply network. Sydney Water issued a notice of anticipated requirements under Section 73 of the Sydney Water Act 1994 on 20/11/2025 (Attachment E) which confirms potable water supply services are available.
Wastewater servicing	Council does not support the operation of the use or the issue of occupation or subdivision certificates until wastewater servicing can be provided in accordance with SEPP (Precincts – Western Parkland City) 2021	Noted. As above the Sydney Water Notice of Anticipated Requirements for this site confirm that wastewater services are available and that it will be serviced by the Cosgroves Creek Carrier Stage 1 which is currently out to tender by Sydney Water. This carrier will be available for service connection upon completion of subdivision infrastructure. Sydney Water. Sydney Water's Section 73 notice of anticipated requirements is provided at Attachment E.
Acquisition authority	This comment does not address the request to liaise with Council in relation to Open Space and Drainage SEPP LRA Mapping.	Acquisition is expected to be consistent with the SEPP acquisition plan, and we provide a table of expected acquisition in the Architectural Plans in Attachment H (see plan A00109).
WSA Precinct Plan	It is requested that this mapping layer is provided as part of the Architectural Plans to clearly demonstrate compliance [no clearing of native vegetation].	The revised Architectural plans in Attachment H demonstrate that native vegetation in avoided lands will not be cleared for the proposed development.
Open Space and Drainage Land	The civil plans are to ensure that Council's mapped "Open Space and Drainage Land" is accessible from all adjoining streets. This change is to be detailed across all architectural, civil and landscaping plans	The open space and drainage land is accessible from the roads adjoining the riparian zone, with the exception of the collector road crossings of Cosgroves Creek, to minimise infrastructure in the riparian zone.
Neighbourhood centre	The site is clearly within the catchment of the neighbourhood centre to the south. As such the proposal must demonstrate that it satisfies the following relevant objectives under the WSAPP: LUO3 Locate Local and Neighbourhood Centres in areas of high amenity linked to public transport. LUO4 Link all centres to, and prioritise, active and public transport access over private vehicles.	The proposal includes the construction of a roundabout intersection with Adams Road that could provide access to the future neighbourhood centre via an additional future leg of the roundabout. This would include the ability for the neighbourhood centre to be accessed via public transport should a future local bus route be established.



Comment	Response																																				
The proposal must reconsider how pedestrians and cyclists are able to move through the site, especially within and between open space on the subject site and the local centre.	Pedestrian and cyclist access from WSABP to the future neighbourhood centre is shown in the revised Landscape Plans in Attachment J.																																				
Building height Council undertook a detailed assessment of the proposed built form as part of initial comments and noted that the proposal does not demonstrate compliance with the height requirements of the WSAPP. As a result of the significant earthworks proposed, the following warehouses exceed the maximum permitted 24m height limit under this section of the WSAPP: Warehouse 2 – height 26.78m Warehouse 4 – height 26.4m Warehouse 6 – height 29.1m Warehouse 7 – height 24.4m Council repeats these comments and recommends that the plans and supporting information are amended in order to demonstrate compliance with this section of the WSAPP.	A height plane diagram in the Architectural plans in Attachment H demonstrate the limited areas where building height exceeds the WSA Precinct Plan controls based on existing ground level. These exceedances are minimal and localised and due to the existing undulating topography of the site. A summary of the maximum building height differences from the existing ground level and how they have been calculated is provided below: <table><tr><th>Existing ground level</th><th>24m height limit level</th><th>Building roof level</th><th>Difference</th></tr><tr><td colspan="4">Warehouse 2</td></tr><tr><td>81.50 m</td><td>105.50 m</td><td>108.45 m</td><td>+2.95 m</td></tr><tr><td colspan="4">Warehouse 5 (previously Warehouse 4)</td></tr><tr><td>70.70 m</td><td>94.70 m</td><td>91.57</td><td>-3.13 m</td></tr><tr><td colspan="4">Warehouse 9 (previously Warehouse 6)</td></tr><tr><td>75.10 m</td><td>99.10 m</td><td>103.75m</td><td>+4.65 m</td></tr><tr><td colspan="4">Warehouse 11 (previously Warehouse 7)</td></tr><tr><td>72.00 m</td><td>96.00 m</td><td>95.14m</td><td>-0.86 m</td></tr></table> <i>Note: as the existing topography undulates, the building height limits correspond. Therefore, building height and variance from height plane is taken at the exact point of greatest exceedance, rather than the highest point of the building.</i> As previously noted, the building heights are measured from existing ground levels and the exceedances have been minimised as far as	Existing ground level	24m height limit level	Building roof level	Difference	Warehouse 2				81.50 m	105.50 m	108.45 m	+2.95 m	Warehouse 5 (previously Warehouse 4)				70.70 m	94.70 m	91.57	-3.13 m	Warehouse 9 (previously Warehouse 6)				75.10 m	99.10 m	103.75m	+4.65 m	Warehouse 11 (previously Warehouse 7)				72.00 m	96.00 m	95.14m	-0.86 m
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Comment		Response
		practicable to account for earthworks balance and minimising retaining wall heights. All building heights comply with the 24 m building height limit from the future ground level.
2. Urban Design		
Recognise Country	The only outcome relating to built form is for a Country inspired colour palette, however this is not evident in the design ... The Recognise Country response should consider Built Form as per the guidelines ... For a project of this significant scale and location, the Recognise Country approaches should apply beyond landscaping and public art.	Additional elements of the proposed development that are designed to address the Recognise Country principles include public art, signage and storytelling, landscaped areas, and office building lobby artwork. WSABP Management proposes to screen warehouse walls with landscaping and is not seeking to highlight these elements, and the design intent is to bring focus to the areas frequented by staff and visitors, and engage with them at that level in high quality ways.
	The project team have not demonstrated how specific views throughout the site have been discussed with Elders and informed the design.	View lines were discussed with the Aboriginal elders consulted during the preparation of the estate design as discussed in the Aboriginal Design Principles report submitted with the EIS.
Massing studies	Provide massing studies to demonstrate how the built form was determined and responds to its context.	The built form response is grounded in site and operational constraints. These key context drivers included: - the site has a measurable topographic fall (approx. RL90 m AHD down to RL62 m AHD) with important views to the runway and Blue Mountains - flooding effects concentrate along Cosgroves Creek, creating both constraints and opportunities for ecological/public amenity - planning controls include a height goal of buildings not exceeding 24 m - the precinct is shaped by airport-related access and operations (connectivity, servicing readiness). Massing, which is presented in the built form proposal, has considered: - the scheme progressed through a gridded 3D resolve across the site to be sympathetic to urban, floodplain, and topographic constraints,



Comment		Response
		while maintaining a commercially functional road/servicing framework connected to airport operations • each building is oriented within this framework, with office planning also supported by a logical user-journey with this context – centralised circulation, boulevard • office elements are designed to create an escalating hierarchy of experience, ground-to-building-to-roof—so occupants can graduate to rooftop gardens and connect to “Sky Country” through shared roof amenity/lookouts. A series of diagrams were included in the Urban Design Report previously submitted with the Response to Submissions, with a massing diagram provided in Attachment N to articulate these principles, which have essentially formed the massing.
Frontages	Demonstrate how frontages to Luddenham Village have been considered	Frontages to Luddenham are address through façade treatments as shown in the revised Architectural plans in Attachment H and landscaping along the frontage to The Northern Road.
Local roads	Local roads under the WSA Precinct Plan are not included and covered in built form or internal driveway, therefore resulting in a loss of canopy cover. Urban Design queries what trade-offs are proposed to offset these impacts	Strict adherence to the local street layout in the WSA Precinct Plan would not facilitate the size of warehouse space proposed which is essential to support the ILHAI concept. Landscaping in these locations is provided to the greatest extent possible while providing sufficient space for safe and efficient operations of the warehouses.
Side setbacks	Side setbacks have not been illustrated on the site plans	Side setbacks are shown in the architectural plans provided in Attachment H .



Comment		Response
Permeable pavers	Not incorporated in the revised application.	To address permeability (carparks/paths/asphalt), conflicting water-quality requirements have been previously considered: - permeable pavements were investigated, but broad application can conflict with water-quality protection and maintenance requirements; therefore, the design prioritises a treatment-train approach (filters, WSUD elements and managed conveyance) before water reaches sensitive environments - experience with permeable pavers in the Mamre Road and Western Sydney Aerotropolis Precincts shows they are typically provided as landscaping measures only and they must be lined to prevent moisture ingress into the subgrade due to soil salinity risks. They do not reduce net runoff being captured, collected and discharged from the site - the public realm is still diversified away from “all asphalt” where appropriate, including gravel areas and WSUD basins/water bodies as part of the landscape masterplan language - the overall “water story” is intentionally centralised - supporting the boulevard-to-riparian sequence and culminating in generous riparian regeneration and parkland experience around the creek.
Pedestrian and shared paths	The proposal does not include the cycle paths throughout the landscape design of the blue-green corridor. This should be provided in accordance with the Precinct Plan.	Noted above. Paths are provided adjacent to park streets and collector roads adjoining the riparian zone. The primary cycle path through open space is located on Lot 30 and the proposed network within the WSABP would facilitate connection with this path.
Canopy cover	Urban Design refers to the Assessing Planner for detailed review of methodology for measuring canopy cover calculations. And notes the lot area should include the building footprints. Public domain outside the lot boundary and street trees should be excluded.	Canopy cover calculations are provided in the landscape plans in Attachment J .
Public domain plan	Accessibility through the precinct should be illustrated on a coordinated landscape or architectural drawing.	Refer to the updated Landscape Plans in Attachment J which includes a circulation plan showing the location of shared paths, pedestrian crossings and connection to the planned future network.



Comment	Response
	In addition, pedestrian priority, should be illustrating across all the driveways to manage pedestrian and vehicle conflicts and traffic calming.
	this should be communicated on an architectural/ landscape drawing so these can be coordinated with landscaping elements and floor finishes.
Access and circulation	Urban Design appreciates the broader strategy to manage conflicts through site and access arrangements. However, pedestrian crossing, pram ramps, pedestrian priority finishes across driveways are not illustrated on a coordinated public domain drawing.
Staff amenities	One café proposed at Warehouse 12 is not adequate for all staff, requires them to make purchases to use therefore is not dedicated.
	Each Warehouse has significant onsite amenities, with all offices enjoying large break out areas with indoor and outdoor dining facilities, and on site kitchen services for staff.
	The proposed cafe is considered adequate noting the site's proximity to Luddenham and the future neighbourhood centre which is likely to provide additional options for food.
	WSABP Management does not intend to establish substantial food retail areas that would compete with the new neighbourhood centre and existing businesses in Luddenham.
	Staff having to walk to the riparian corridor for communal outdoor area is a suboptimal outcome as this is a very long distance. Warehouse 1 and 6 staff will have to walk almost 300m to access. In addition it is unclear whether there is any shaded areas throughout the riparian corridor to take a break or have lunch.
	Staff amenities are included at each warehouse office, including open rooftop areas, with landscaped shared paths providing outdoor access to all warehouses and the Cosgroves Creek riparian zone.
	Two pocket parks are proposed within the riparian area that will have table and seating areas for staff and public use. The proposed landscaping includes significant tree planting and shade structures to provide shaded areas in the riparian corridor.



Comment		Response
Warehouse facades	It is unclear how the warehouse facades have improved. The office buildings designs are well considered however the warehouses which are significantly sized and highly visible still present as generic, grey warehousing.	The Architectural plans in Attachment H include updated elevations that include articulation of warehouse facades.
Public art	For a project of this size and scale, there is a unique opportunity for Public Art to be a part of the architecture and therefore should be indicated on the architectural drawings.	Additional public art information is provided in the Landscape Plans in Attachment J , with significant artwork proposed by the indigenous artist Shane Smithers.
3. Heritage		
Complying development	If the intent is for the proposal to be delivered through complying development. Clear and prescriptive controls to ensure compliance with the intent and identified outcomes of the Recognise Country and Heritage Interpretation Strategy should be developed and enforced as a site-specific development code.	The proposed development is SSD and subject to assessment in accordance with the provisions of the EP&A Act. No complying development provisions are proposed.
Built heritage	The 1800s dairy slab barn should be retained on site, and in keeping with the objectives of the Bradfield area, the development adjusted to protect and conserve an item significant to the history of the area.	The SoHI concludes that the measures to be implemented prior to and following demolition of the creamery is appropriate for the conservation status of the item.
Heritage Interpretation Strategy	The applicant must develop separate public art and heritage interpretation strategies that talk to each other and ensure a coordinated approach.	Refer to the updated Heritage Interpretation Strategy in Attachment G
	The interpretation elements are condensed into a small area of the site. The interpretation should extend across the site and provide a comprehensive network of elements that provide a coordinated interpretative landscape.	Refer to the response prepared by EMM in Attachment G which notes that a Heritage Interpretation Plan will be developed in consultation with Council and consider the use of other interpretation elements throughout the site including materials, locations and layouts of interpretation.
	Further detailed designs for each element of the heritage interpretation should be provided to the Council for approval before installation.	As noted above, WSABP Management proposes to develop a Heritage Interpretation Plan in consultation with Council.
Recognise Country	The recognise country template has been submitted, but has not been signed by all Knowledge Holders involved in the process. Further, it appears that sections of the template are incomplete.	A completed Recognise Country Response template is provided in Attachment K .



Comment		Response
Cultural safety	There is no clear indication that the proposal sought to adopt and follow principles of cultural safety.	As noted in the response provided in Attachment G , cultural safety is an important consideration and how this will be adopted will be discussed with Aboriginal stakeholders during development of the Heritage Interpretation Plan.
Meaningful engagement	It is questioned whether engaging with only two Elders would meet the objectives of meaningful engagement. It is further questioned, based on the targeted responses to landscaping and signage, that the consultants failed to adequately engage the stakeholders to bring them through the design process and ensure they had input in all aspects of the proposal. Furthermore, it appears that the applicant, due to a failure to undertake the process before lodgement, has sought to minimise the potential for changes incurred as a result of the Recognise Country process.	Ongoing consultation with Aboriginal people has continued as WSABP Management develops the design of the estate. The revised Heritage Interpretation Strategy at Attachment G, revised ACHAR in Attachment I and Recognise Country Response in Attachment J includes a summary of consultation, including an additional focus group meeting held in September 2025 to discuss the proposed development.
Economic development opportunities	No clear policy or framework has been identified to encapsulate the potential for First Nations' economic development opportunities.	WSABP Management is investigating opportunities to support First Nations businesses and Aboriginal people during the construction and operation of the development. This would include initiatives such as apprenticeship programs, use of local First Nations businesses and working with organisations to contribute towards or provide training and career development opportunities.
Cultural values and heritage	This element is currently lacking in the available documentation, with little discussion surrounding cultural aspects which may be relevant to the site and how they could be integrated into the landscape and building architecture.	Refer responses above, noting a Heritage Interpretation Plan would include consideration of these principles.
Landscape	The consultant and applicant have responded well in terms of landscape; however, it is important to note that detailed design of the yarning circle should be undertaken in consultation with Elders to ensure that it is designed respectfully and in a culturally appropriate manner	Noted. The Heritage Interpretation Strategy includes the provision for ongoing consultation with the Aboriginal elders and this would include the detailed design and installation of the yarning circle.



Comment	Response
Built form The concept signage of the estate features no language or artwork associated with First Nations, and there is no evidence of language or naming adopted in other locations of the site. The Recognise Country talks about view lines to the Blue Mountains and creeks and ridges, but there appears to be no consideration of that within the design of the development. Changes in articulation, built form and materiality can assist in reinforcing these view corridors. Country, as a broad concept, considers water, the environment, sustainability and fauna and flora. Large expanses of Colorbond or tilt-up concrete, as proposed, are not necessarily in keeping with these concepts of “Country” and do not ground the development in the landscape. Consideration could be given to CLT, massed timber and structural insulated panels, which possess a higher sustainability rate and can introduce a more natural appearance, grounding the development in the landscape. In addition to the use of sustainable materials, there is the option to think beyond the standard industrial box and integrate perforated metal cladding, adopting First Nations and Colonial public art and architectural features, and assisting in breaking up the large expanses of plain aesthetically poor walls, improving the urban appearance of the warehouses.	The revised Heritage Interpretation Strategy in Attachment G includes incorporating cultural elements into the design of the development. This would be developed further during the construction of the estate and establishment of landscaping, yarning circle, wayfinding signage, welcome to Country and Interpretative signage and street naming. The visual impact assessment prepared in support of the application demonstrates that viewlines to the Blue Mountains are not obstructed when viewed from east of the WSABP site. The proposed building configuration responds to view corridors to the greatest extent possible. The proposed landscape plans seek to embellish riparian areas and high quality landscape within the estate. The proposed landscaping aims to bring landscape forward, and conceal the warehouses (i.e. not make a feature of warehouse walls). Also the proposed designs include high quality offices with Aboriginal artwork in parks and lobby areas, rather than temporary facades on warehouse walls. The warehouse elevations are intentionally treated to avoid a “big-box” outcome and keep the built form visually recessive through integrated screening and estate-wide colour integration (including tonal/gradient treatment), supported by significant landscaping that softens long frontages and hard edges. This approach is complemented by architectural layers that add human-scale detail where people experience the buildings most directly:



Comment	Response
A further component of “Country” is “Sky Country”, which relates to the connection between people and the stars, or ancestral beings. There is no indication of the adoption of this approach in the design, which could be through the provision of light wells, lighting designed to reduce light pollution and a reduction in reflective materials.	• office entries incorporate brick archways that create a more human-scaled threshold and embed Dharug storytelling as part of the arrival experience. • brick is used as a recurring motif to support identity and heritage connection across the estate. • heritage interpretation is embedded through adaptive/interpretive elements (including reference to convict-made brickwork). • material and colour selection is grounded in “Colours of Country” principles that explicitly reflect and honour Indigenous heritage. Within this framework, the revised submission seeks to introduce some gentle pattern changes that create greater variability within the spans of warehouse walls, but is similarly intended to act with subtlety, being consistent with the overall intent for the estate, breaking down perceived scale while remaining recessive and supported by generous landscaping. Several initiatives seek to provide an interpretation of Sky Country as a motif in the proposed architectural designs: • rooftop gardens are a key passive strategy and are described as lookout points (as well as thermal and rainwater benefits) • the sustainability features include generous shaded daylighting on the office facades, reducing reliance on artificial lighting • the master plan approach explicitly aims to mitigate light spill. Directly relating to sky country, the design can be described as: • providing access to every office roof as shared garden space, so occupants have regular, meaningful opportunities to connect to the sky (including dawn/dusk conditions and seasonal changes) • implementing a “dark-sky aware” lighting approach that supports the light-spill objective—e.g., controlled fittings, timed/dimmed operation,



Comment		Response
	Finally, water in combination with fauna and flora is also a critical element of “Country”, and the development appears to only provide a simplistic response. There are opportunities due to the scale of the development to transform carparking areas and footpaths from large areas of asphalt to reinforced compacted granite or gravel, allowing for water to penetrate, reducing overland flow.	and careful material reflectivity selection—while still meeting operational safety needs. The proposal positions Cosgroves Creek as the central organising “heart” of the estate—explicitly an opportunity to “centre on water,” celebrate the enabling engineering, and connect users into the riparian landscape. It also frames the broader place-making hierarchy as culminating in the regenerated creek, supported by gathering spaces and cultural elements. Consideration of permeable paving is provided in the responses to the Urban Design comments above.
4. Public Art		
Public art	Council recommends that public art is clearly incorporated is at an appropriate scale to the proposed construction and is integrated into construction to address visual impacts created for current and future residents, site staff, visitors and other static and transient audiences.	Proposed public art is included in the revised Estimated Development Cost report in Attachment L. Updated Landscape Plans in Attachment J provide further details about proposed public art.
5. Flooding		
Flood storage volume	The proposed collector road and culverts will cause loss of flood storage volume. To meet Performance Outcome PO8, 2.5.1 (Flood Management) of Western Sydney Aerotropolis Development Control Plan 2022, compensatory excavation must be provided to ensure no loss of flood storage volume for all flood events. The FIRA must include cut and fill volume calculations, and plans and sections of earthworks required for flood compensatory excavation.	The updated Flood Impact Risk Assessment in Attachment M demonstrates that the proposed development would not have an adverse effect on flood storage volume and flows. There is no flood storage provided within the Cosgroves Creek at present, with the exception of the farm dams which are proposed to be filled to varying degrees. These were assumed full for the purpose of the flood modelling. As such, the proposed use of culverts does not reduce flood storage.
6. Community planning		
Worker facilities	In compared to the targeted workers and visitors, the proposed café is inadequate. Also, it didn’t include provision of other key services like health care/emergency medical support (the nearest hospital is around 20km away), grocery, pharmacy etc. As the site is isolated and not	The SIA demonstrates that the key services in the region would be adequate to support employees at the estate.



Comment		Response
	adequately accessible, we think, the proposed 24/7 business park should be self-sufficient with all essential services for the workers.	WSABP Management does not intend to develop services that would compete with the planned neighbourhood centre nearby on Adams Road.
	The proposal should include the potential scope of future expansion for developing a local centre including additional facilities if it is required by the business and locals.	
7. Environmental health		
Contamination	It is inappropriate for preparation of the Remediation Action Plan to be deferred until prior to commencement of construction.	The identified area of potential asbestos contamination is located in the road footprint at the crossing of Cosgroves Creek. Preparation and endorsement of a RAP prior to commencing earthworks in this location is appropriate as the potential areas of contamination does not pose a serious risk of environmental harm.
Noise and vibration	Mitigation measures recommended by Renzo Tonin & Associates in Section 7.3 of their report must be incorporated into the design and construction of the premises to ensure that the proposed development is capable of being operated in an environmentally satisfactory manner. Furthermore, a more detailed assessment must be required of the building envelope construction and mechanical plant prior to issue of the Construction Certificate and Occupation Certificate. Specific tenancy requirements including preparation of Noise Management Plans and compliance monitoring must be considered in consultation with a suitably qualified acoustic consultant prior to and during occupation of the premises.	Noted. Noise verification will occur through detailed design.
Construction and Operational EMP	Construction and Operational Environmental Management Plans (CEMP and OEMP) shall be prepared for the proposed facility and be submitted to the consent authority for review. The Plans shall be written by a	Noted



Comment		Response
	suitably qualified and experienced environmental consultant and address means by which the commitment in the Environmental Impact Statement and other environmental assessment reports will be fully implemented.	
8. Engineering		
Conditions of consent	Council recommended numerous conditions of consent for the Department's consideration.	WSABP Management anticipates that DPHI would prepare conditions of consent consistent with other SSD consents.
9. Traffic and transport		
Future access	Provision including intersection treatment should be made for a future second access to the subject site. Potential access is to via Future Anton Road.	The civil plans demonstrate that the interim road designs include the provision to easily convert turnarounds to intersections with the roads on the northern and eastern boundary of the site.
Staging	Staging development plan is to be prepared to identify the required infrastructure to facilitate the staging developments.	A staging plan is included in the Architectural Plans (plan A00201) at Attachment H .
Estate road design	Design of the proposed local or collector roads should comply with the relevant DCP, Austroads Guides and the relevant Australian Standards. The proposed roundabout of Adams Road/Collector Road 3 should be submitted to Council for approval. Prior to the issue of the construction certificate for any roadwork, the Applicant must submit the design plans to the satisfaction of Council and provide a copy of the approved documents to the Certifier for information. Detailed design plans for the access driveways and car park including swept path analysis, line markings and sign posting in accordance with the DCP and AS2890 is to be submitted to Council Traffic and Transport Section for review. Any structure adjacent to the driveway exit eg letterbox shall not be greater than 1.2 m in height, to allow sight distance for motorists exiting the property. A signage and linemarking plan along the roads fronting subject site should be submitted to Council Transport Section for approval. The public street lighting should be designed and installed in accordance with Council's and Endeavour Energy specifications along all the roads	Noted. The roads are designed to comply with these provisions. All road designs would be submitted to Council for review prior to commencing construction.



Comment		Response
	fronting the development site should be submitted to Council Traffic and Transport Section for review.	
	All the approved roadworks, traffic control devices, pedestrian crossings, signposting, line marking and street lighting are to be completed to Liverpool Council requirements, at no expense to Liverpool Council or Transport for NSW.	
Emergency evacuation plan	An emergency evacuation and access plan should be prepared and submitted to Council for review.	Noted. An emergency evacuation plan would be prepared in consultation with Council and emergency services.
Anton Road	The Department of Planning, Housing and Infrastructure is to consider entering a state planning agreement with the proponent for road reserve and land dedication along the future Anton Road connection along the frontage of the subject precinct.	Noted. WSABP Management would dedicate the land within the site to the relevant roads authority to facilitate construction of the Anton Road extension.
Permits	The applicant shall submit a Section 138 Roads Act application to Council for any proposed new roads and road work in, on or over a public road including the payment of application and inspection fees, to Council's Land Development and Transport Sections for approval.	Noted. WSABP Management would obtain the necessary permits and approvals prior to commencing construction of the road upgrades in the public road reserve.
	A road occupancy permit is to be submitted to Council Traffic and Transport Section for any works within the public road reserve.	
Operational traffic management plan	Provide an Operational Traffic Management Plan (CTMP).	An OTMP would be prepared prior to commencing operation of the development.
Construction traffic management plan	A Construction Traffic Management Plan (CTMP) prepared by a qualified traffic and transport practitioner detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval prior to the issue of a Construction Certificate.	A CTMP would be prepared prior to commencing construction of the development.



Comment		Response
10. Contributions		
EDC Report	Please ensure the appropriate Cost Summary Report is provided in accordance with both the Contributions Plan and clause 208 of the EP&A Regulation.	A revised Estimated Development Cost Report is included as Attachment L .
11. Natural environment		
Stormwater management	Additional stormwater management measure is highly recommended to be incorporated and include biofiltration system or bioretention system maintenance in the Vegetation Management Plan.	The stormwater management system already incorporates these measures (wetlands, bioretention, storage ponds etc.) to achieve the relevant stream health & water quality requirements of the Aerotropolis. The updated Civil Report in Attachment C includes a maintenance schedule for these devices/measures. Therefore, no additional measures are necessary to achieve the water quality objectives of Cosgroves Creek.
Dam dewatering	A report should be prepared after the dam dewatering has been completed.	Noted. WSABP Management would accept a condition requiring the preparation of a report on dam dewatering.
Vegetation clearing	To prevent the viability of any weed seeds that may be present, it is highly recommended to create large mulch hot compost piles in accordance with the Australian Standard for Mulches, AS 4454:2012 - Composts, Soil Conditioners, and Mulches. Mature native trees, particularly those that contains habitat features such as hollows, should be reused where possible. Prior to the removal of each tree, they shall be examined by a qualified ecologist for the presence of hollows, active nests of birds or fauna. Erosion protection and slope stabilization measures, edge effect, dam perimeter works Exclusion fencing Revegetation Additional tasks in VMP Landscaping	The measures suggested by Council have been incorporated into the revised Biodiversity Management Plan included as Attachment O .

