

Goodman Property Services Australia Pty Ltd.

Project Atlas

Airport Safeguarding Risk Assessment

Reference: Project Atlas ASRA

REV A – SSDA Submission | 25 March 2026



Image courtesy of Google Earth, Vexcel Imaging US

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

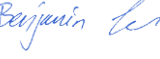
Job number 603687-62

Arup Australia Pty Ltd | ABN 76 625 912 665

Arup Australia Pty Ltd
Wurundjeri Woiwurrung Country
Sky Park, One Melbourne Quarter
699 Collins Street
Docklands, VIC, 3008
Australia
arup.com

Document Verification

Project title Project Atlas
Document title Airport Safeguarding Risk Assessment
Job number 603687-62
Document ref Project Atlas ASRA
File reference

Revision	Date	Filename	Project Atlas_ASRA_Draft		
Draft	16/02/2026	Description	Submission for client review		
			Prepared by	Checked by	Approved by
		Name	Nieve Powell	Ben Smith	Ben Smith
		Signature			
Rev A - preliminary	02/03/2026	Filename	Project Atlas_ASRA_RevA_prelim		
		Description	Integration of client feedback from draft report		
			Prepared by	Checked by	Approved by
		Name	Nieve Powell	Ben Smith	Ben Smith
		Signature			
REV A – SSDA Submission	25/03/2026	Filename	Project Atlas_ASRA_REV_A_SSDA_Submission		
		Description	Inclusion of updated site layout drawings from client (REV A – SSDA Submission)		
			Prepared by	Checked by	Approved by
		Name	Nieve Powell	Ben Smith	Ben Smith
		Signature			

Issue Document Verification with Document



Contents

Executive Summary	1
1. Introduction	2
1.1 Purpose of Report	2
1.2 Proposed Development	2
1.3 Scope of Assessment	4
1.4 Triggers for submission to Airservices Australia	4
1.5 Addressal of State Environmental Planning Policy (Precincts—Western Parkland City) 2021	4
2. Regulatory Framework	5
2.1 Height Limitations and Intrusion into the WSI Prescribed Airspace	5
2.2 Other controlled activities within prescribed airspace	9
3. NASF Guidelines Assessment	11
3.1 Aircraft Noise	11
3.2 Windshear and Turbulence	12
3.3 Wildlife Hazards	13
3.4 Wind Turbines / Monitoring Towers	14
3.5 Lighting and glare	14
3.6 Protected Airspace	15
3.7 Aviation (CNS) Facilities	16
3.8 Helicopter Landing Sites	17
3.9 Public Safety Areas	19
4. Conclusions	20
4.1 Summary	20
4.2 Recommendations	20
5. References	21

Tables

Table 2-1: site attributes according to WSI Airport Safeguarding Tool of 10 Roberts Rd, Eastern Creek	6
Table 3-1: Wildlife Hazard Management Action Table (Wildlife Attraction Risk and Actions by Land Use, NASF Guideline C, Attachment 1)	14
Table 6-1: Fulfillment of SEPP 2021 Requirements	29

Figures

Figure 1: Google Earth imagery of Project Atlas site and surrounds, Vexcel Imaging US, Inc. Imagery, dated 02/02/2024.	3
Figure 2: position of Sydney airports relative to Project Atlas site (image from Google Earth, 2026)	3
Figure 3: plan view of surfaces of OLS, based on information the Public Authority for Civil Aviation, 2018.	5
Figure 4: subject site location beneath the OLS (image from SEED; The Central Resource for Sharing and Enabling Environmental Data in NSW; NSW Department of Planning, Housing and Infrastructure, 2014)	6

Figure 5: Building 1 side profile with height measurements (Drawing No. ATL-GRM-XXX-XX-DG-AR-SSDA A06	7
Figure 6: Building 2 side profile with height measurements (Drawing No. ATL-GRM-XXX-XX-DG-AR-SSDA A06	7
Figure 7: Example transmission tower designs (Transgrid, 2024)	7
Figure 8: adjacent power infrastructure to subject site (Open Infrastructure Map, 2026)	8
Figure 9: height estimation of crane works at site relative to adjacent structures and reference points	8
Figure 10: ANEC Contour per Airport Safeguarding Tool (Western Sydney International Airport, 2025)	12
Figure 11: Assessment trigger area around runways (taken from NASF Guideline B)	12
Figure 12: Windshear assessment zone per Airport Safeguarding Tool (Western Sydney International Airport, 2025)	13
Figure 13: Figure 1.8 from WSI Airspace and flight path design draft EIS, showing wildlife buffer zones (Australian Government Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2023)	13
Figure 14: Lighting intensity zones relative to the Project Atlas subject site	15
Figure 15: SEPP 2021 Building Restricted Area Map, NSW Department of Planning and Environment (2021)	17
Figure 16: Helipads identified by Arup in the vicinity of 10 Roberts Rd	18

Appendix A

Executive Summary

Arup has been engaged by Goodman Property Services Australia Pty Ltd. to undertake an Airport Safeguarding Risk Assessment (ASRA) for Project Atlas, a proposed data centre development at 10 Roberts Road, Eastern Creek, Sydney. The assessment responds to the Planning Secretary's Environmental Assessment Requirements (Application No. SSD-101067971) and evaluates the compatibility of the proposed development with operations at Western Sydney International (Nancy-Bird Walton) Airport (WSI), with specific regard to the National Airports Safeguarding Framework (NASF), the Federal Airports Act 1996, and associated regulations and planning controls.

The purpose of the ASRA is to identify and assess credible aviation-related risks associated with the completed subject site and to demonstrate that the development will not pose a hazard to safe, efficient, and regular aircraft operations at WSI. The assessment considers permanent built form and potential operational effects such as lighting, turbulence, emissions, wildlife attraction, and impacts on protected airspace and aviation infrastructure.

Project Atlas is located approximately 11 km northeast of WSI, within an established industrial precinct. While the site lies beneath the Obstacle Limitation Surface (OLS) for WSI, the proposed maximum building height of approximately 35 m above ground level is substantially below the allowable OLS height at the site. Cranes employed during construction works at the subject site are also not expected to intrude into the OLS; however, it is recommended that crane height management be treated as a construction risk, with early verification undertaken to ensure that cranes proposed for use during construction will not extend to a height of more than 130 m above ground level (integrating a 10 m margin of safety to the OLS). Accordingly, the construction and operation phases of the development are not expected to intrude into prescribed airspace, including OLS or PANS-OPS surfaces, and therefore, the development does not constitute a controlled activity under Part 12 of the *Airports Act 1996* on the basis of height. Commonwealth airspace approval is therefore not required.

The assessment finds that other potential controlled activities within prescribed airspace, such as artificial lighting, sunlight reflectance, windshear and turbulence, smoke, dust, steam, or gaseous emissions, do not present credible risks to aviation operations at WSI given the site's distance from the airport, the nature of the proposed land use, and the scale of the development. The site is outside lighting buffer areas, windshear assessment zones, public safety areas, glide path areas, and building restricted areas identified for WSI. Aircraft noise exposure does not constrain the proposal, as data centres are not noise-sensitive land uses and the site lies outside the Australian Noise Exposure Contour (ANEC).

In relation to wildlife hazards, the site is located within the 8-13 km buffer identified by NASF Guideline C, corresponding to the lowest risk category. A data centre is comparable to non-food warehousing, which is associated with a very low wildlife attraction risk. With standard site management practices and the implementation of the project's waste management plan, no additional wildlife mitigation measures are required from an aviation safeguarding perspective.

The assessment also concludes that the development will not adversely affect Communication, Navigation and Surveillance (CNS) facilities operated by Airservices Australia or Defence. The site is well outside any CNS-related Building Restricted Areas, and there are no credible mechanisms by which building height, materials, electrical systems, or emissions could interfere with aviation systems at this distance. Similarly, there are no Strategically Important Helicopter Landing Sites (SHLS) in proximity to the site, and the nearest hospital-associated helipad is sufficiently distant to preclude any safeguarding concerns.

Overall, the ASRA concludes that Project Atlas is compatible with Western Sydney International Airport operations and satisfies the intent and requirements of the NASF and relevant aviation legislation at this stage of planning. No aviation-related constraints have been identified that would preclude approval of the development. Limited procedural consultation, such as notification to Airservices Australia for confirmation during detailed design, may be undertaken as a precautionary measure, but no significant mitigation or redesign is required to address aviation safeguarding risks.

1. Introduction

1.1 Purpose of Report

Arup has been engaged by Goodman Property Services Australia Pty Ltd. to undertake an Airport Safeguarding Risk Assessment (ASRA) for Project Atlas located at 10 Roberts Road, Eastern Creek, Sydney. Per the Planning Secretary's Environmental Assessment Requirements (SEARs) outlined in Application Number SSD-101067971, *"a risk assessment of the proposed development on the Western Sydney Airport operations and addressing related matters in the State Environmental Planning Policy (Western Parkland City) 2021 and the National Airports Safeguarding Framework and associated guidelines, including consideration of wildlife hazards"* is required.

The ASRA is a risk assessment of the proposed development on the Western Sydney International Airport (WSI) operations. Its purpose is to demonstrate that the development will not pose a hazard to aviation.

It focuses on identifying and assessing credible risks to airport operations that may arise from the proposed data centre and how those risks interact with WSI.

The purpose of this assessment is to:

- Identify and describe the aviation operating environment relevant to the site, including airspace protection surfaces, flight paths, and airport safeguarding controls.
- Review applicable legislation, standards, and guidelines, including the National Airports Safeguarding Framework (NASF), the *Federal Airports Act* 1996, and relevant State Environmental Planning Policies (SEPP) and Development Control Plan (DCP) requirements.
- Assess the proposed development, including built form, temporary works and crane operations, against all relevant aviation safeguarding criteria.
- Determine potential hazards to aircraft operations arising from the development, including noise exposure, lighting, windshear/turbulence, wildlife risks, and impacts on prescribed airspace.
- Identify any requirements for controlled activity approvals or further consultation with aviation stakeholders (CASA, WSI, Airservices Australia, the Department).
- Highlight any areas of non-compliance, conditional compliance, or items requiring further detailed modelling or planning refinement.

The objective of this assessment is to provide a preliminary evaluation of aviation-related risks associated with the development, identifying how the proposal aligns with relevant safeguarding requirements and where further analysis may be needed.

1.2 Proposed Development

1.2.1 Site description

The site is located in Eastern Creek in Western Sydney and is surrounded by a range of industrial and environmental interfaces. It is bordered to the west by Old Walgrove Road, across which there is a large 330/132kV substation and switchyard. A number of logistics depots are located along the northern site boundary (Western Freight Management, Palm Trans Pty Ltd and Tamex Transport Sydney). To the south, the site faces an Austral Bricks facility, which is situated across a large green space occupied by raised high voltage transmission lines. Before the interface with the Austral Bricks, the southern extent of the site also contains two major fresh-water supply pipelines. Across Roberts Road to the east, a CDC Data Centre borders the site.



Figure 1: Google Earth imagery of Project Atlas site and surrounds, Vexcel Imaging US, Inc. Imagery, dated 02/02/2024.

1.2.2 Location

The subject site is located 11 km from WSI. Other airports within a 40 km radius of the subject site are the Bankstown Airport, Camden Airport, Sydney Airport, and RAAF Base Richmond. The location of the site relative to these airports is shown in Figure 2. The scope of this assessment is limited to the possible interactions with WSI, in accordance with the SEARs (NSW Department of Planning, Housing and Infrastructure, 2026).

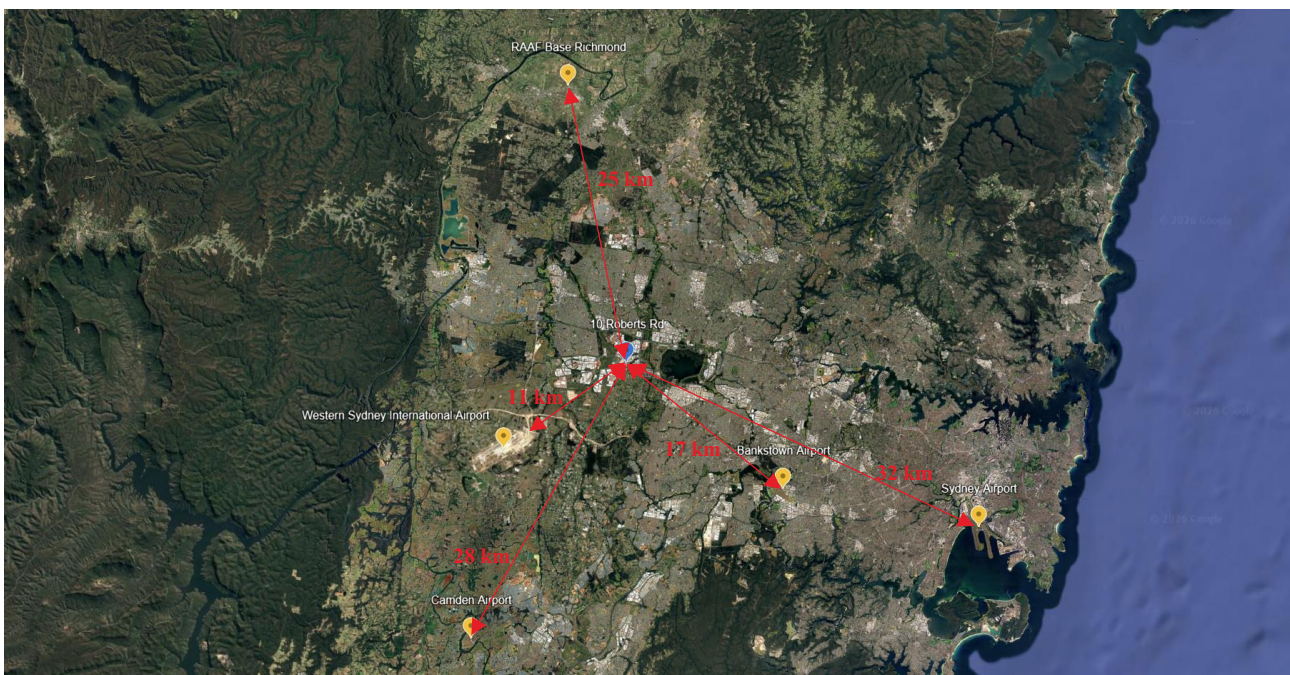


Figure 2: position of Sydney airports relative to Project Atlas site (image from Google Earth, 2026)

1.3 Scope of Assessment

This Aviation Safeguarding Risk Assessment evaluates the proposed development against applicable aviation-related constraints, including relevant NASF guidelines, prescribed airspace requirements, lighting controls, windshear and turbulence considerations, wildlife hazards, and the protection of aviation facilities. The assessment focuses solely on the aviation impacts of built form, temporary structures and construction activities within the site. It does not address non-aviation planning matters, tenant-specific operational risks, detailed engineering design, or broader environmental or social impacts, which are assessed under separate specialist studies. Findings presented herein are preliminary and based on currently available information; additional analysis and consultation may be required as the project progresses through detailed design and formal approval processes.

1.4 Triggers for submission to Airservices Australia

A Development Application must be submitted to Airservices Australia where a proposed development or activity in the vicinity of an airport or aerodrome may affect aviation safety. This includes, but is not limited to, building developments, crane or elevated work platform operations, wind farms, communications infrastructure, and other permanent or temporary structures.

For federally-leased airports, submission is legally required where a proposal constitutes a “controlled activity” under the *Airports Act 1996* and the *Airports (Protection of Airspace) Regulations 1996*. A controlled activity is any proposed activity that would intrude into prescribed (protected) airspace, including airspace above the Obstacle Limitation Surfaces (OLS) or Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) surfaces. Controlled activities also include temporary objects, ground-based equipment, or non-structural intrusions such as glare, turbulence, smoke, or emissions that may impact aircraft operations.

This assessment evaluates whether the subject site in its operational or construction phases may affect aviation safety at WSI, and whether it constitutes a controlled activity, necessitating further assessment through submission of a Development Application to Airservices Australia.

1.5 Addressal of State Environmental Planning Policy (Precincts—Western Parkland City) 2021

Per the Planning Secretary’s Environmental Assessment Requirements for Application Number SSD-101067971, this Airport Safeguarding Risk Assessment must address matters in the State Environmental Planning Policy (Western Parkland City) 2021 (SEPP 2021) pertaining to airport safeguarding. Chapter 4 *Western Sydney Aerotropolis, Part 3 Development Controls – Airport Safeguards* of the SEPP 2021 includes airport safeguarding development controls that align closely with Commonwealth airspace legislation and the NASF guidelines.

In this assessment, compliance with Chapter 4 of the SEPP 2021 is demonstrated in Table 4-1 of Appendix A.3, which provides a brief summary of the contents of the relevant clauses in SEPP 2021, and a reference to the section of this ASRA in which they are addressed. Relevant map contours from SEPP 2021 are featured in Appendix A.4.

2. Regulatory Framework

2.1 Height Limitations and Intrusion into the WSI Prescribed Airspace

2.1.1 Regulatory and legislative height limitations

Part 12 of the *Airports Act 1996* (the Act) and the *Airports (Protection of Airspace) Regulations 1996* (the Regs) establish the statutory framework for protecting airspace in the vicinity of Australian airports. Under Division 4 of Part 12 of the Act, any activity that results in an intrusion into an airport's prescribed airspace is classified as a **controlled activity**, and such activities must not proceed without approval from the relevant Commonwealth authority.

2.1.2 Temporary regulatory exemptions during airport construction

Prior to WSA's opening (currently anticipated in 2026), the Regs include limited exemptions for intrusions into the OLS (see section 2.1.3) where the proposed activity is below certain height limits, in relation to temporary structures not present for more than 1 calendar year, or where the intrusion was explicitly authorised by the WSA Airport Plan. In addition, regulation 16A(3)(e) provides an exemption for temporary structures, such as cranes, provided the activity does not extend beyond 31 December 2025. Under Regulation 16A(4)(c), controlled activities may continue under Part 3 of the Airport Plan until June 30, 2026.

Arup anticipates that construction works at the subject site will continue past June 30, 2026. However, an intrusion into the OLS by construction works is not anticipated. Therefore, it is expected that a special exemption for construction works will not be required. Construction risks to aviation are assessed in this report alongside ongoing operational site risks.

2.1.3 Obstacle Limitation Surface (OLS)

Obstacle Limitation Surfaces exist to provide pilots with good visual clarity with respect to an airport. Around Western Sydney Airport, the Obstacle Limitation Surface (OLS), was established on 19 October 2017 pursuant to the Act and the Regs. Figure 3 depicts the generic case for an OLS, showing in particular the slanted take-off and approach surfaces, in line with the front and rear of the runway(s).

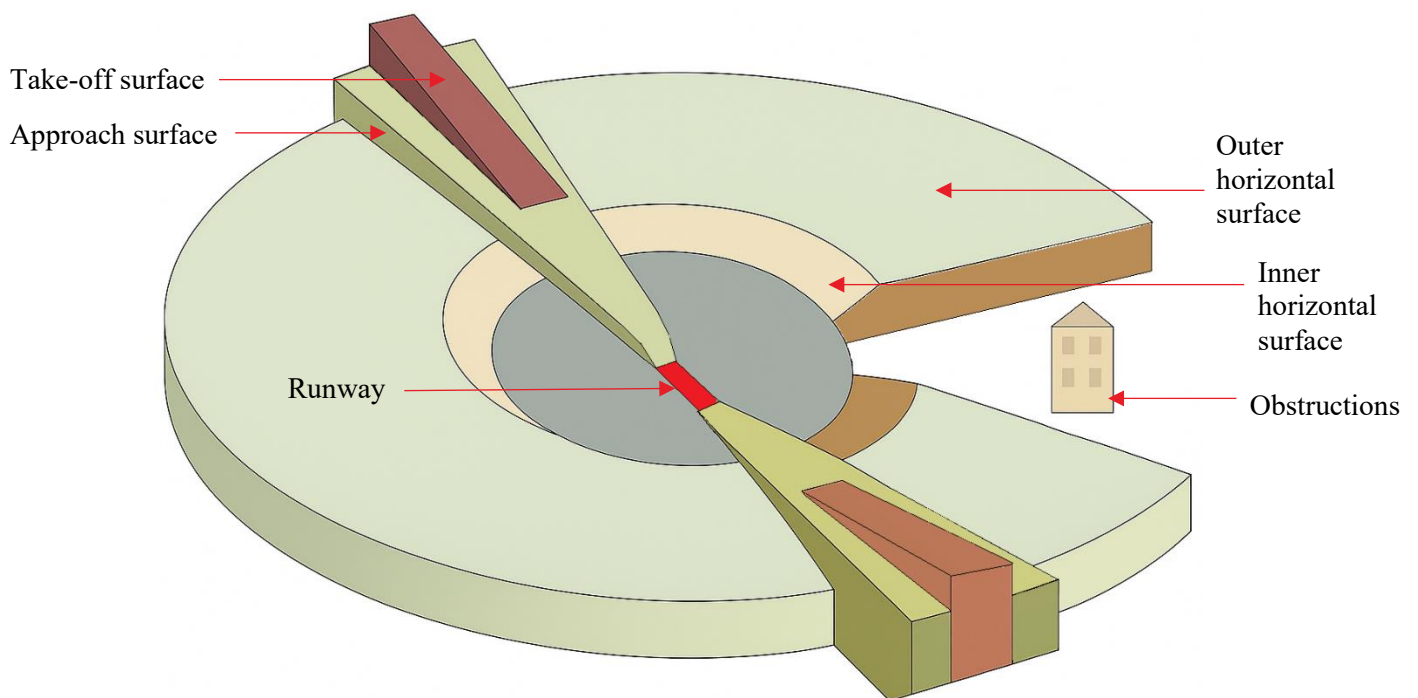


Figure 3: plan view of surfaces of OLS, based on information the Public Authority for Civil Aviation, 2018.

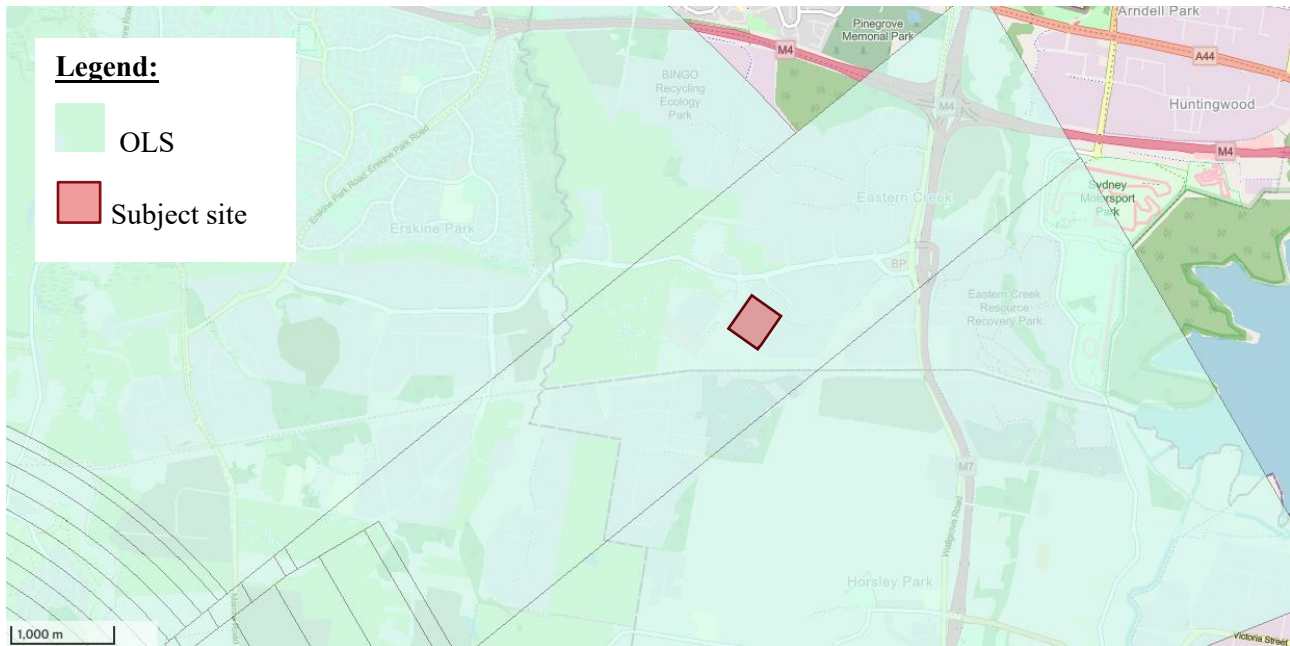


Figure 4: subject site location beneath the OLS (image from SEED; The Central Resource for Sharing and Enabling Environmental Data in NSW; NSW Department of Planning, Housing and Infrastructure, 2014)

Operational Phase OLS Evaluation

Per Figure 4, the subject site is beneath the footprint of the OLS for WSI. Per the *Airport Safeguarding Tool* provided by WSI, the subject site has attributes described in Table 2-1.

Table 2-1: site attributes according to WSI Airport Safeguarding Tool of 10 Roberts Rd, Eastern Creek

Parameter	Value
Coordinates:	150.835208, -33.815971
Lot/Plan:	553//DP1110447
Ground Elevation (AHD):	85 m
OLS Elevation (AHD):	225 m
OLS Height Relative to Ground Level:	140 m
Local Government Area:	Blacktown (C)
Wildlife Hazard Zones:	8-13km
Lighting Buffer Area:	No
Inside Windshear Assessment Zone:	No
Inside Public Safety Area:	No
Inside Glide Path Area:	No

Based on data from Table 2-1, the Project Atlas development may permissibly extend to a height of up to 140 m from ground level before encroaching on the OLS. The tallest point on the Project Atlas data centre infrastructure at 10 Roberts Rd is the roof and flue of Building 2, at **34.8 m**, per excerpts from Drawing no. ATL-GRM-XXX-XX-DG-AR-SSDA A06 0006, rev A, included here as Figure 5 and Figure 6. Therefore, no penetrations to the obstacle limitation surface are expected to be posed by the Project Atlas data centre in its operational phase.

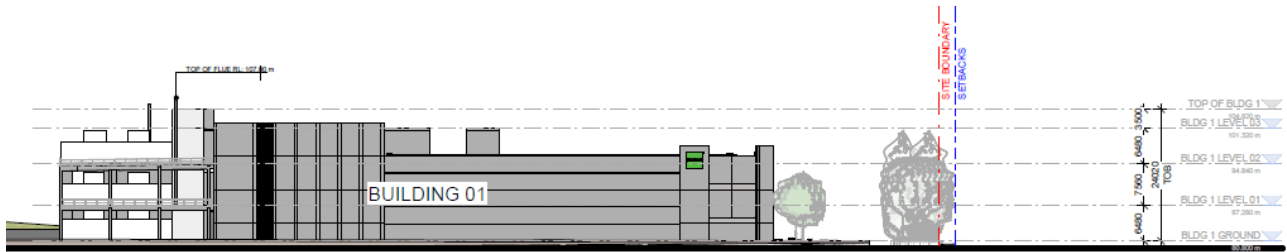


Figure 5: Building 1 side profile with height measurements (Drawing No. ATL-GRM-XXX-XX-DG-AR-SSDA A06 0006; General Arrangement Elevations – SSDA, Rev A)

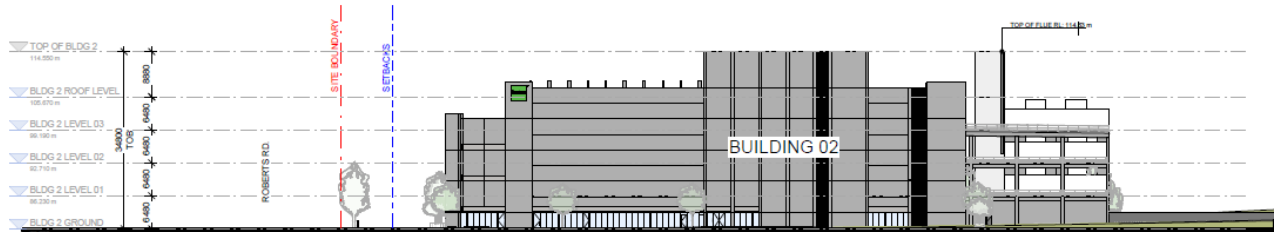


Figure 6: Building 2 side profile with height measurements (Drawing No. ATL-GRM-XXX-XX-DG-AR-SSDA A06 0006; General Arrangement Elevations – SSDA, Rev A)

Under Part 12 of the Act and the Regs, Commonwealth approval is required only where a proposed activity intrudes into an airport's protected (prescribed) airspace, defined by the Obstacle Limitation Surface (OLS) and Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) surfaces (the PANS-OPS is discussed further in section 2.1.4 of this report).

The proposed development does not intrude into the protected airspace of Western Sydney International Airport. Accordingly, it does not constitute a controlled activity under the Airports Act, and approval from the Secretary of the Australian Government Department of Infrastructure is not required based on building height.

Construction phase OLS Evaluation

It is anticipated that cranes used during the construction phase of the Project Atlas development will protrude substantially above the final roof height of the development. Therefore, they are independently assessed here for any aircraft-related risks they may pose.

Based on observations and visual inspection of the adjacent data centre development, knowledge of transmission tower design for 330 kV and 132 kV power lines (Figure 7) and inspection of the adjacent power infrastructure (Figure 8), the height of cranes used for construction at the Project Atlas site can be estimated.

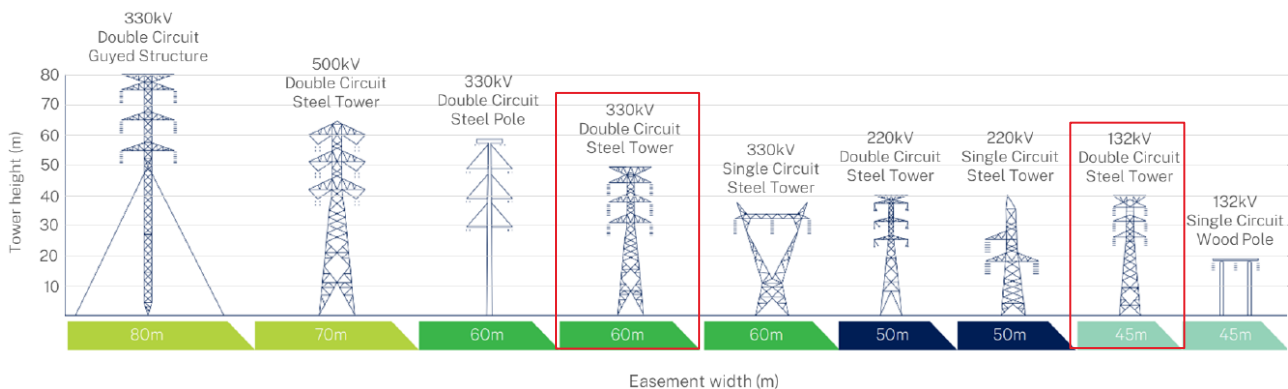


Figure 7: Example transmission tower designs (Transgrid, 2024)

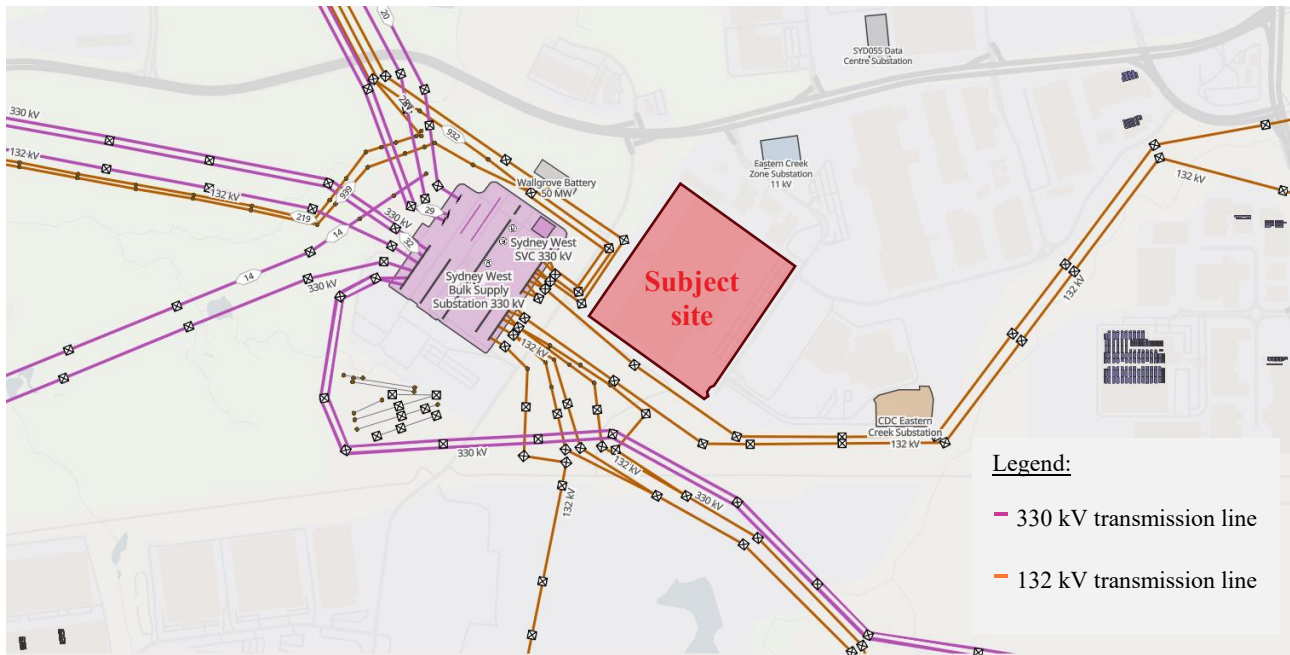


Figure 8: adjacent power infrastructure to subject site (Open Infrastructure Map, 2026)

Based on semi-quantitative observations of adjacent development and infrastructure; cranes used at the subject site during the construction phase are anticipated to extend to a height of between 65 and 80 m above ground level (Figure 9). A freestanding tower crane at the upper limit of its height (around 100 m tall) would still be beneath the OLS, which is 140 m above ground level at the subject site.



Figure 9: height estimation of crane works at site relative to adjacent structures and reference points

The semi-quantitative assessment undertaken to estimate the maximum anticipated crane heights at the subject site provides only an indicative representation of their potential operational envelope. Accordingly, it is recommended that Goodman confirm, at the earliest practicable stage, that cranes proposed for use during construction will not penetrate the Obstacle Limitation Surface (OLS) at 140 m above ground level. Arup further recommends that, where it is reasonably foreseeable that any component of a crane could exceed a height of 130 m (i.e., within 10 m of the OLS), Goodman undertakes additional detailed assessments to evaluate the risk of OLS encroachment and put measures in place to stop this encroachment from occurring. Such assessments and controls should consider credible failure modes, operational tolerances, and extreme weather conditions.

2.1.4 Procedures for Air Navigation Services (PANS-OPS)

Unlike the OLS, which safeguards visibility and line of sight for pilots, the PANS-OPS surfaces protect instrument-based flight procedures, particularly from collision with obstacles when visibility is poor and the aircraft may be solely dependent on instrumentation for guidance. The PANS-OPS does not permit any permanent penetrations.

The PANS-OPS “for WSI will be declared once the flight paths have been approved” (Australian Government Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2023). Therefore, concrete assessment of the relative height of the Atlas Data centre development in reference to the PANS-OPS cannot yet be made; however, the PANS-OPS is generally higher than the OLS, and therefore it is reasonable to assume that if the development does not breach the OLS, it will not breach the PANS-OPS.

2.2 Other controlled activities within prescribed airspace

The Act and Regulations impose limits within the prescribed airspace relating to aspects of a development other than height, including limitations on lighting, reflectance, and site emissions that may affect pilots and or aircraft in achieving safe take-off and landing from WSI.

2.2.1 Artificial lighting

For the purposes of Division 4 of the Act, the following is a controlled activity in relation to a prescribed airspace:

(d) operating a source of artificial light, where: (i) the intensity of the light emitted exceeds the level ascertained in accordance with the regulations; and (ii) the light is capable of blinding or confusing pilots of aircraft operating in the prescribed airspace;

The effect of planned lighting is evaluated further per NASF Guidelines in section 2.7 of this report.

2.2.2 Sunlight reflectance

For the purposes of Division 4 of the Act, the following is a controlled activity in relation to a prescribed airspace:

(e) operating prescribed plant, or a prescribed facility, that reflects sunlight, where: (i) the intensity of the reflected sunlight exceeds the level ascertained in accordance with the regulations; and (ii) the reflected sunlight is capable of blinding pilots of aircraft operating in the prescribed airspace;

Glare mitigation is evaluated further per NASF Guidelines in section 2.7 of this report.

2.2.3 Air turbulence

For the purposes of Division 4 of the Act, the following is a controlled activity in relation to a prescribed airspace:

(f) an activity that results in air turbulence, where: (i) the level of the turbulence exceeds the level ascertained in accordance with the regulations; and (ii) the turbulence is capable of affecting the normal flight of aircraft operating in the prescribed airspace;

Where, according to the Regs:

the level of air turbulence for turbulence caused by an emission from a stack or vent is upward vertical velocity of 4.3 metres per second at the point of emission.

Air turbulence effects are evaluated further per NASF Guidelines in section 2.4 of this report.

2.2.4 Smoke, dust, water vapour and other visual disturbances

For the purposes of Division 4 of the Act, the following is a controlled activity in relation to a prescribed airspace:

(g) an activity that results in the emission of smoke, dust or other particulate matter, where: (i) the emission exceeds the level ascertained in accordance with the regulations; and (ii) the smoke, dust or particulate matter is capable of affecting the ability of aircraft to operate in the prescribed airspace in accordance with Visual Flight Rules;

and

(h) an activity that results in the emission of steam or other gas, where: (i) the emission exceeds the level ascertained in accordance with the regulations; and (ii) the steam or gas is capable of affecting the ability of aircraft to operate in the prescribed airspace in accordance with Visual Flight Rules.

Credible visible emissions are evaluated further per NASF Guidelines in section 2.8.4 of this report.

This section draws upon the *National Airports Safeguarding Framework* (NASF), developed by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (Australian Government, 2012). The NASF provides a nationally consistent policy framework for managing the interface between airport operations and surrounding land uses, with the dual objectives of protecting community amenity and ensuring the ongoing safety and operational viability of airports. It establishes a series of safeguarding guidelines that address key risk areas associated with airport operations, including aircraft noise, building height restrictions, public safety zones, wildlife hazards, windshear, lighting, and other aviation-related constraints.

The NASF comprises a series of guidelines that address key aviation safeguarding matters, including aircraft noise, obstacle limitation surfaces, public safety areas, wildlife hazards, windshear, lighting, and other aviation-related constraints. These guidelines are applied by state and local planning authorities to inform strategic planning and development assessment, and to identify where development may be incompatible with airport operations or subject to additional assessment or approval requirements.

The advice in this section is also informed by the Western Sydney International (Nancy-Bird Walton) Airport Safeguarding Tool (WSI, 2025). This web-based tool provides spatial guidance on the presence of airport safeguarding overlays in the vicinity of WSI, including development height limits, noise exposure, safety-related constraints, wildlife hazard areas, lighting intensity controls, building restricted areas, and windshear considerations.

The information provided by the safeguarding tool is of a general nature only, is explicitly disclaimed as “for guidance only” and may be subject to change. Notwithstanding these limitations, the use of the Western Sydney International Airport Safeguarding Tool is considered appropriate for this assessment. The tool provides a consolidated and accessible representation of current safeguarding constraints relevant to the study area and supports a high-level understanding of aviation-related planning considerations. When used in conjunction with the NASF guidelines and other statutory planning controls, the tool assists in identifying key risks, informing the scope of further assessment, and ensuring that safeguarding issues are appropriately considered at this stage of the assessment process.

2.3 Aircraft Noise

Rezoning restrictions outlined in Guideline A, Sections I–III, are only applicable when residential or other noise-sensitive activities are being proposed within the affected area. Industrial and utility-type developments, such as data centres, are generally not categorised as noise-sensitive uses. There are no prohibitions or constraints on the establishment of industrial developments within any Australian Noise Exposure Forecast (ANEF) contour. Therefore, the development of a data centre is not limited by noise emissions from air traffic and airport operations.

Moreover, irrespective of noise effects on the data centre operation, the data centre site lies outside the ANEC noise contour (Figure 10).



Figure 10: ANEC Contour per Airport Safeguarding Tool (Western Sydney International Airport, 2025)

2.4 Windshear and Turbulence

According to NASF Guideline B, buildings must be assessed if they fall within the ‘assessment trigger area’ around each runway: 1200 m either side of runway centreline, 900 m landside of runway threshold or 500 m along the runway from the threshold – this is represented in Figure 11.

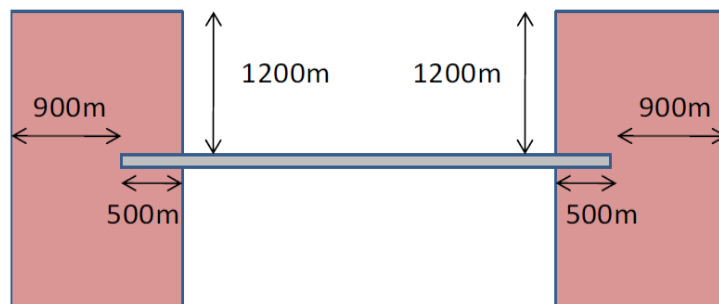


Figure 11: Assessment trigger area around runways (taken from NASF Guideline B)

The assessment trigger zones featured on the online Airport Safeguarding Tool (Figure 12) follow a marginally different geometry to that described by Figure 12, but demonstrate the sizeable distance between the assessment trigger areas and the subject site, 11 km to the northeast of the airport. Given the subject site is well in excess of 1200 m from the airport (by a factor of more than 9), no windshear/turbulence assessment is required.

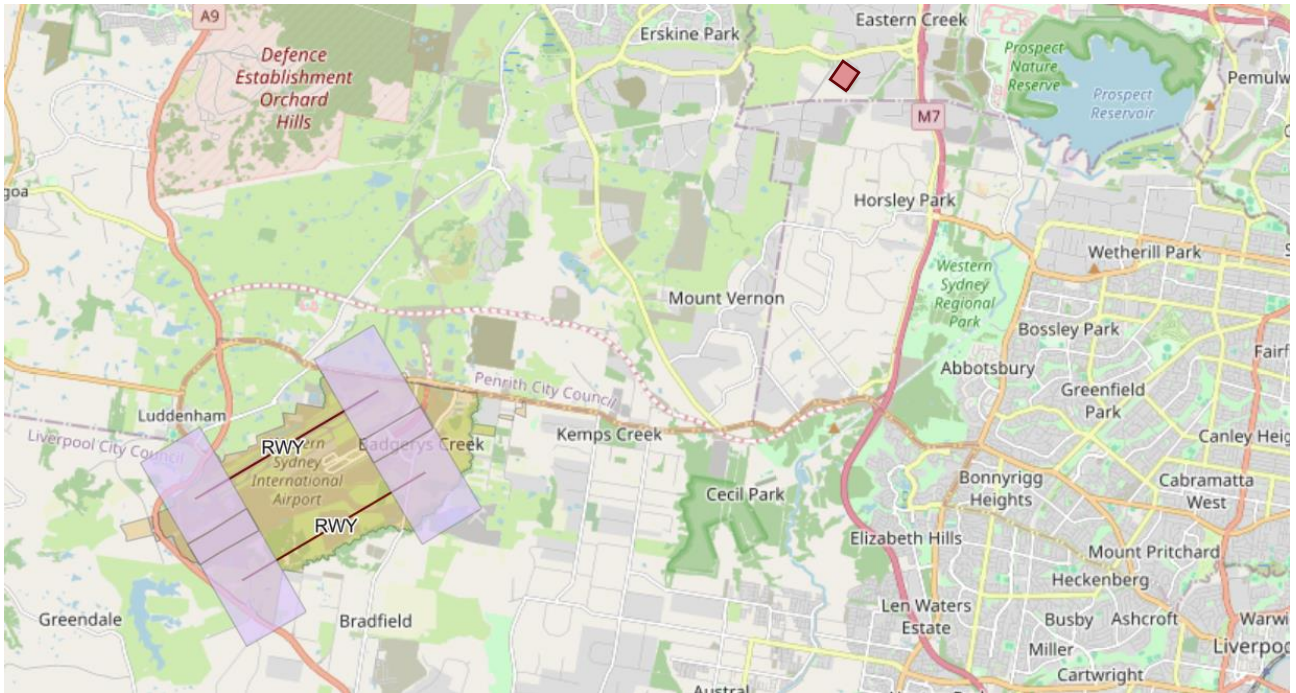


Figure 12: Windshear assessment zone per Airport Safeguarding Tool (Western Sydney International Airport, 2025)

2.5 Wildlife Hazards

NASF Guideline C requires assessment of any land use within 13 km of an airport because this is the ICAO-recognised area in which wildlife-attracting land uses must be managed. The subject site is within the lowest risk area classification: Area C: 8-13 km.

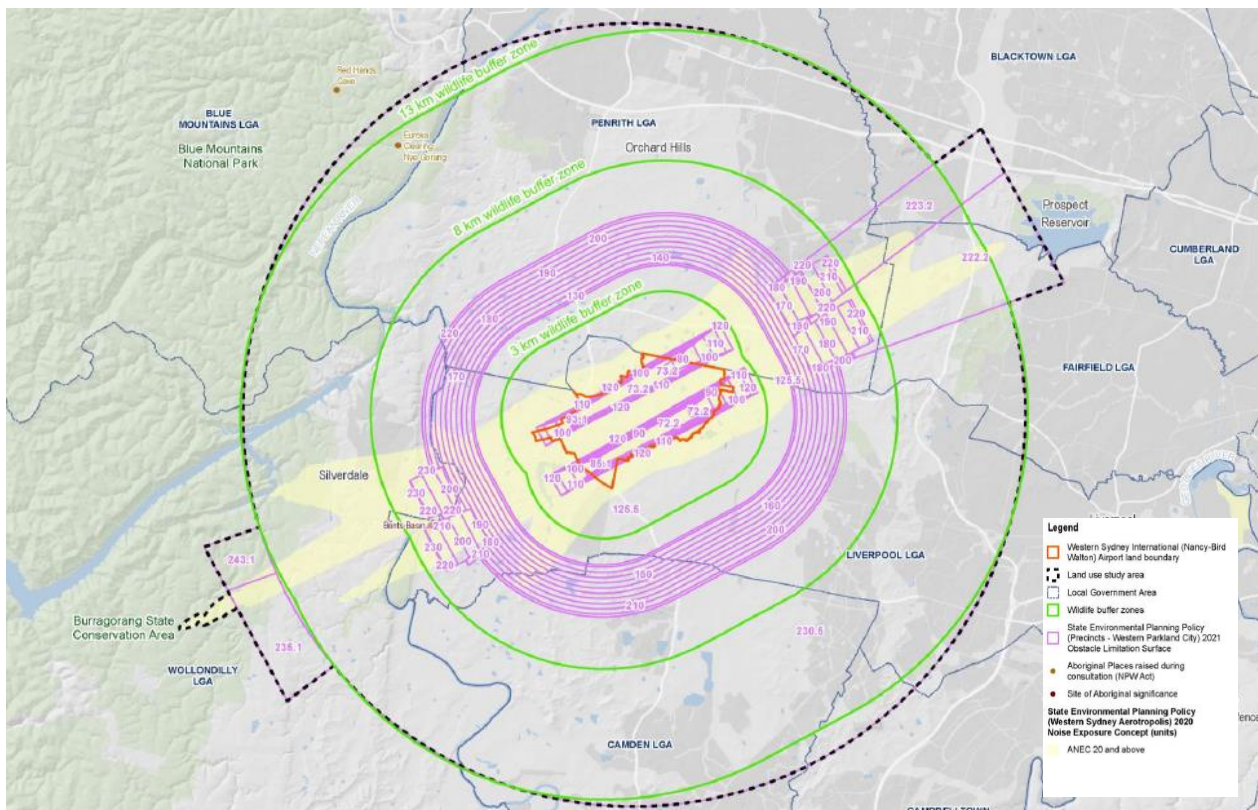


Figure 13: Figure 1.8 from WSI Airspace and flight path design draft EIS, showing wildlife buffer zones (Australian Government Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2023)

Per Table 2-2, the most aligned land use type with a data centre is “warehouse (non-food storage)”. This land use type has likely attractants of “structural elements” and “waste and food”, with the overall wildlife attraction risk deemed “very low” and “no action” required at the 8-13 km buffer (Table 2-2).

Table 2-2: Wildlife Hazard Management Action Table (Wildlife Attraction Risk and Actions by Land Use, NASF Guideline C, Attachment 1)

Land use types	Likely attractants ▲ natural elements ■ structural elements ● waste and food			Wildlife attraction risk	Actions for existing development and land uses in wildlife management areas			Actions for new and changed development and land uses in wildlife management areas		
					0-3 km (Area A)	3-8 km (Area B)	8-13 km (Area C)	0-3 km (Area A)	3-8 km (Area B)	8-13 km (Area C)
Agriculture										
Turf farm, piggery, abattoir, aquaculture	▲	■	●	High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Fruit tree farm/orchard	▲	■	●	High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Fish processing/packing plant	▲	■	●	High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Farm (cattle, dairy, poultry, crops)	▲	■	●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Horticulture, viticulture, market farms/gardens	▲	■	●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Forestry	▲		●	Low	Monitor	Monitor	No Action	Monitor	Monitor	No Action
Plant nursery	▲	■	●	Low	Monitor	Monitor	No Action	Monitor	Monitor	No Action
Conservation										
Wildlife/conservation area - wetland, waterways	▲			High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Wildlife/conservation area - dryland	▲			Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Recreation										
Significant open water (ancillary to development)	▲			High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Showground	▲	■	●	High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Significant landscaped space (ancillary to development)	▲			Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Golf course	▲	■	●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Park, playground	▲		●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Picnic areas, camping ground	▲		●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Racetrack, horse riding school	▲	■	●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Sports facility (tennis, bowls, football fields)	▲	■	●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Commercial										
Food processing or storage facility		■	●	High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Fast food, drive-in, outdoor restaurant		■	●	Low	Monitor	Monitor	No Action	Monitor	Monitor	No Action
Shopping centre		■	●	Low	Monitor	Monitor	No Action	Monitor	Monitor	No Action
Warehouse (food storage)		■	●	Low	Monitor	Monitor	No Action	Monitor	Monitor	No Action
Car park		■	●	Very Low	Monitor	No Action	No Action	Monitor	No Action	No Action
Cinemas		■	●	Very Low	Monitor	No Action	No Action	Monitor	No Action	No Action
Hotel/motel		■	●	Very Low	Monitor	No Action	No Action	Monitor	No Action	No Action
Office building		■	●	Very Low	Monitor	No Action	No Action	Monitor	No Action	No Action
Petrol station		■	●	Very Low	Monitor	No Action	No Action	Monitor	No Action	No Action
Warehouse (non-food storage)		■	●	Very Low	Monitor	No Action	No Action	Monitor	No Action	No Action
Utilities										
Food / organic waste facility		■	●	High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Putrescible waste facility - landfill			●	High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Putrescible waste facility - transfer station		■	●	High	Mitigate	Mitigate	Monitor	Incompatible	Mitigate	Monitor
Water infrastructure (drains, channels, basins)	▲			High	Mitigate	Mitigate	Monitor	Mitigate	Mitigate	Monitor
Non-putrescible waste facility - landfill			●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Non-putrescible waste facility - transfer station		■	●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Sewage / wastewater treatment facility		■	●	Moderate	Mitigate	Monitor	Monitor	Mitigate	Mitigate	Monitor
Potable water treatment facility	▲	■		Low	Monitor	Monitor	No Action	Monitor	Monitor	No Action

A waste management plan for the site has been developed by SLR with internal Project Number: 610.033298.00001, dated 30 January 2026. This waste management plan further reduces the risk of excessive wildlife attraction to the site.

A Preliminary Biodiversity Development Assessment Report (PBDAR) has been developed by SLR with internal Project Number: 610.033298.00001, dated 11 February 2026. This PBDAR lists 0.3 ha of PCT 3975 Southern Lower Floodplain Freshwater Wetland, which is not anticipated to attract a meaningful quantity of additional fauna to the site. Considering the significant green open space along the site’s southern boundary and the Reedy Creek located approximately 650 m to the East of the development, 0.3 ha of wetland presents minimal additional wildlife attraction hazard to WSI.

2.6 Wind Turbines / Monitoring Towers

NASF Guideline D deals with Managing the Risk of Wind Turbine Farms as Physical Obstacles to Air Navigation. Since the proposed development does not involve the construction or introduction of wind turbines, this guideline is not relevant to the ASRA.

2.7 Lighting and glare

Per NASF Guideline E (Lighting in the vicinity of airports) and the online Airport Safeguarding Tool (Table 2-1), the site is not within the Lighting Buffer Area.

The subject site is located 11 km from WSI. Limitations on light intensity with respect to the airport runways extends as far as 6000 m (Figure 14). As such, the subject site is not within the controlled area.

According to Guideline E:

The potential for glare caused by reflected sunlight from structures such as buildings has been raised in some quarters as a potential source of distraction to pilots. However, CASA has advised that glare from buildings tend to be momentary and therefore unlikely to be a source of risk. The potential for risk from building glare is further attenuated by the use of sunglasses which pilots normally wear in bright daylight.

No meaningful difference in either the prevalence of glare generation, or in the credibility of a risk to pilot visibility is identified during the project's construction phase when compared with its operational phase.



Figure 14: Lighting intensity zones relative to the Project Atlas subject site

2.8 Protected Airspace

This report section related to NASF Guideline F (Managing Prescribed Airspace).

2.8.1 Obstacle Limitation Surface (OLS)

The OLS is covered in section 2.1.3 of this report.

2.8.2 Procedures for Air Navigation Services (PANS-OPS)

The PANS-OPS is covered in section 2.1.4 of this report.

2.8.3 Radar Terrain Clearance Chart (RTCC) hazards

RTCC protection surfaces are used by Air Traffic Control to support safe radar vectoring by defining minimum altitudes / protection surfaces that provide terrain and obstacle clearance. For WSI, the detailed RTCC surfaces have not been published in the publicly available materials used for this preliminary assessment. Given the Project Atlas site is approximately 11 km from WSI and the proposed permanent structures are low-rise (maximum 34.8 m above ground level for Building 2 rooftop/flue), no RTCC penetration is anticipated at this stage. Notwithstanding, this should be confirmed during detailed design via the Airservices Australia's "Developments at and around airports" assessment pathway and/or through the WSI airspace protection process.

2.8.4 Emissions affecting visibility

NASF Guideline F requires assessment of activities that generate plumes; such as steam, smoke, dust, or gas; which may affect visibility or safe aircraft operations. The data centre does not include any industrial processes capable of generating large visible plumes; generator exhausts and HVAC discharge are overwhelmingly transparent, short-duration and remain far below protected airspace. Therefore, no operational plume-related visibility issues are expected. During construction, emissive earthworks or equipment operations are not anticipated during construction at the brownfield subject site; however, suitable controls should be implemented during any demolition works to mitigate the risk of generating a large dust cloud.

2.8.5 Plume rise and gaseous efflux hazards

The *Airports (Protection of Airspace) Regulations 1996* prescribe a turbulence threshold for stack/vent emissions: an upward vertical velocity of 4.3 m/s at the point of emission. Separately, CASR 139.180 provides that CASA may determine an emissions source that generates a gaseous efflux with a velocity exceeding 4.3 m/s at the point of emission to be a hazard to aircraft operations.

Data centre developments may include emissions sources such as emergency generator exhausts and, in some configurations, mechanical plant discharges. If any proposed exhaust stack/vent at Project Atlas has a point-of-emission velocity exceeding 4.3 m/s, an operational assessment should be undertaken and the appropriate CASA notification/assessment process followed (including provision of required plume parameters).

Based on the currently available concept information, the development does not include continuous industrial combustion sources. Emergency generator operation would be intermittent and short duration (testing and outages). While this reduces the likelihood of a sustained plume hazard, the statutory velocity trigger is based on point-of-emission velocity rather than frequency. Therefore, the design should demonstrate either (a) point-of-emission velocities at or below the 4.3 m/s threshold, or (b) that any exceedance does not create a hazard to aircraft operations through an accepted plume rise assessment method.

2.9 Aviation (CNS) Facilities

Guideline G of the National Airports Safeguarding Framework (NASF) seeks to ensure that development does not degrade the performance of Communication, Navigation and Surveillance (CNS) systems operated by Airservices Australia or Defence. This includes preventing adverse effects such as signal obstruction, reflective interference, electromagnetic emissions, or plume rise within designated Building Restricted Areas (BRAs).

According to the State Environmental Planning Policy (SEPP) 2020 Building Restricted Area Map, the subject site is not located within any Building Restricted Area (Figure 15), nor is it within the airport glide area (Table 2-1). Given its location approximately 11 km from WSI, the site sits far outside the zones where CNS facilities are sensitive to obstruction or interference.

Electrical systems commonly used in data centres, such as transformers, switchgear, and UPS equipment, can generate extremely low-frequency electromagnetic fields (ELF-EMF). However, there is no evidence that ELF-EMF poses any interference risk to radar, navigation aids, or other CNS systems. At this distance from the airport and at the 34.8 m rooftop and stack height of Building 2, the development is also well beyond the critical areas for ILS/GBAS localiser or glidepath protection surfaces and cannot plausibly intersect any CNS-related BRAs.

Airservices Australia recommends that developments in the vicinity of airports be submitted for review via its “Developments at and around airports” assessment pathway to confirm that aviation safety and CNS infrastructure are not compromised. This referral process is precautionary in nature and applies broadly to developments that could potentially interact with protected airspace or CNS facilities.

Under NASF Guideline G, CNS safeguarding requirements apply specifically within defined Building Restricted Areas associated with individual facilities. The subject site is not located within any mapped CNS Building Restricted Area, nor within protected operational airspace. In accordance with the NASF, development outside these safeguarded areas is not identified as presenting a risk to CNS infrastructure.

Specifically, no credible risk exists in relation to:

- Multipath reflections: façade geometry and distance place the site outside any environment where reflections could affect CNS receivers.
- Electromagnetic interference (EMI): electrical and ICT systems do not generate emissions capable of affecting CNS systems at this range.
- Physical height: the development sits well below any protected obstruction surfaces and outside all mapped BRAs, and any credible expansions to the specified BRAs.
- Potential reflectivity: building orientation and distance render any reflective-surface concerns non-credible.
- General electromagnetic compatibility: modern data centre equipment is not associated with interference at aviation frequencies, and no CNS-sensitive installations are located within a radius where such effects could occur.
- No construction activities, including hot works and arc welding, are expected to have any perceptible effect on airport CNS capabilities: Arup knows of no precedent in restricting welding activities at a distance of over 10 km from an airport.

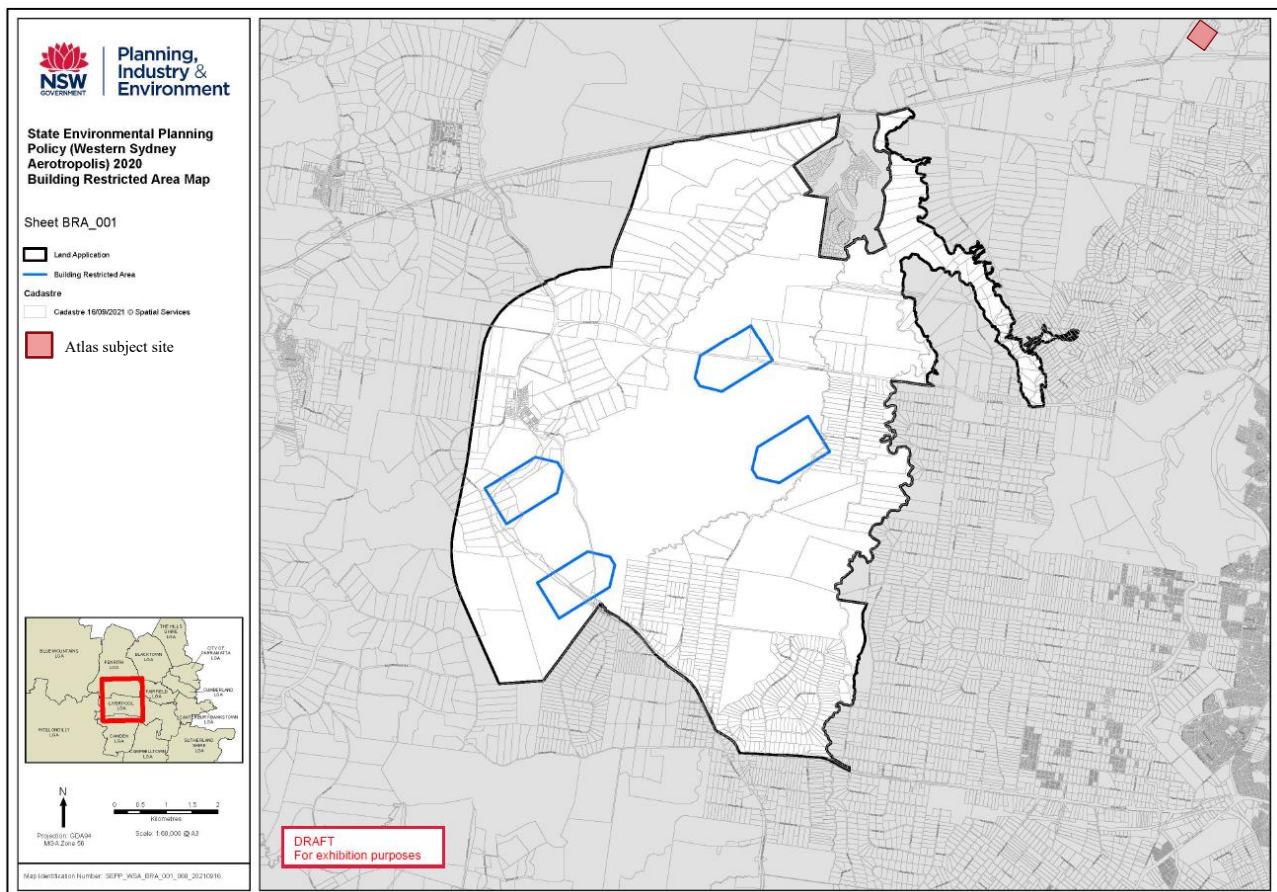


Figure 15: SEPP 2021 Building Restricted Area Map, NSW Department of Planning and Environment (2021)

2.10 Helicopter Landing Sites

2.10.1 Purpose and Application of Guideline H

Guideline H of the National Airports Safeguarding Framework (NASF) provides guidance to State/Territory and local government decision-makers on protecting Strategically Important Helicopter Landing Sites (SHLS) from incompatible land-use and development. Its purpose is to safeguard the safe, efficient and

ongoing operation of helicopter services, particularly those supporting emergency, health and other critical services, by avoiding encroachment into helicopter flight paths and the introduction of aviation hazards.

2.10.2 Regulatory and Planning Context

In Australia, HLS are not licensed, certified or regulated in the same manner as aerodromes under Part 139 of the Civil Aviation Safety Regulations 1998 (CASR), and the Airports Act 1996 makes no specific reference to HLS. Unlike aerodromes, helicopter landing sites (HLS) are not comprehensively regulated under a single national legislative framework. As a result, Guideline H relies primarily on State/Territory and/or Local Governments land-use planning systems to manage risks to critical helicopter infrastructure.

2.10.3 Identification of Strategically Important Helicopter Landing Sites

There is no national inventory or register of SHLS in Australia. Responsibility for identifying HLS that warrant protection rests with individual State and Territory jurisdictions, typically in consultation with asset owners and operators.

Guideline H identifies SHLS as including:

- HLS associated with hospitals;
- Elevated HLS located within populated areas;
- HLS subject to instrument flight procedures; and
- Any other HLS identified as strategic by State/Territory or Commonwealth governments or authorities.

Only HLS meeting one or more of these criteria are intended to trigger safeguarding considerations. Not all helipads or landing areas are considered strategically important.

2.10.4 Desktop Identification of Nearby Helicopter Landing Sites

For the purposes of this assessment, Arup has undertaken a desktop review to identify known helicopter landing sites within the broader study area. This review utilises publicly available aviation mapping data (OurAirports, n.d.), supplemented by aerial photography to identify helipads associated with publicly listed hospitals.

Given the absence of a formal SHLS register and the variable regulatory status of HLS, this approach represents a conservative screening exercise only.

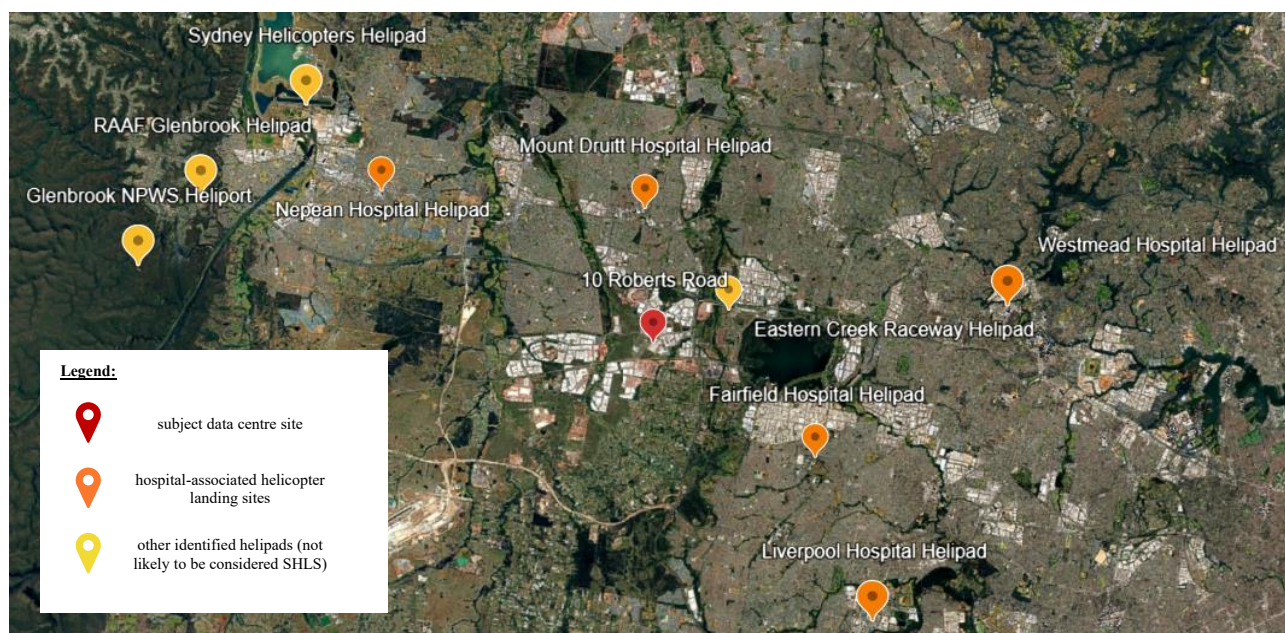


Figure 16: Helipads identified by Arup in the vicinity of 10 Roberts Rd

2.10.5 Assessment Outcome

The pin closest the subject site is located approximately 2.9 km away, representing the Eastern Creek Raceway Helipad (not a credible SHLS). The closest hospital-associated helicopter landing site to the Project Atlas data centre development, which could credibly be designated as an SLHS, is located approximately 5.5 km to the north at Mount Druitt Hospital. This separation distance is well beyond the range at which land-use conflicts typically arise for helicopter operations. In practice, development-related safeguarding considerations, such as flight path protection, obstacle intrusion, fan protection, and wind or turbulence effects, are generally limited to distances within 3.4km of an identified SHLS, according to Guideline H.

Based on the absence of any SHLS in close proximity to the subject site, there are no foreseen impacts on helicopter flight paths, operational safety, or safeguarding requirements arising from the proposed development. The data centre is therefore considered compatible with the intent and requirements of NASF Guideline H, and no additional referral, mitigation or safeguarding measures are required.

2.11 Public Safety Areas

Per Table 2-1, the subject site is not within a Public Safety Area, so further assessment is not required.

3. Conclusions

3.1 Summary

This Airport Safeguarding Risk Assessment evaluates the proposed Project Atlas data centre at 10 Roberts Road, Eastern Creek, against the aviation safeguarding requirements relevant to Western Sydney International (Nancy-Bird Walton) Airport. The assessment has been undertaken in accordance with the Planning Secretary's Environmental Assessment Requirements, the State Environmental Planning Policy (Precincts—Western Parkland City) 2021, the *Airports Act 1996*, the *Airports (Protection of Airspace) Regulations 1996*, and the National Airports Safeguarding Framework (NASF).

Based on the site's location approximately 11 km from WSI, the scale of the proposed development, and the nature of the land use, the assessment finds that the proposal does not present a credible risk to the safe, efficient or regular operation of aircraft. The permanent built form remains well below all applicable Obstacle Limitation Surface and credible PANS-OPS protection surfaces and does not constitute a controlled activity under Commonwealth airspace legislation.

Assessment against the NASF guidelines confirms that the development is not constrained by aircraft noise exposure and is located outside windshear assessment zones, lighting buffer areas, public safety areas, building restricted areas, and glide path protection zones. Wildlife attraction risks are assessed as very low and consistent with surrounding industrial land uses. No impacts on aviation Communication, Navigation and Surveillance facilities or Strategically Important Helicopter Landing Sites have been identified.

Potential temporary construction impacts and operational emissions have been reviewed at a screening level and are not considered to give rise to aviation hazards, subject to standard design compliance and procedural consultation where required.

Overall, Project Atlas is considered compatible with the operational and safeguarding requirements of Western Sydney International Airport. No aviation-related constraints have been identified that would preclude approval of the development, and the proposal is consistent with the intent of applicable aviation safeguarding policy and legislation.

3.2 Recommendations

1. It is recommended that Goodman confirm, at the earliest practicable stage, that all cranes used during construction will remain below the OLS. Where it is reasonably foreseeable that any component of a crane could exceed 130 m above ground level, Goodman should initiate additional detailed assessments to evaluate the potential risk of OLS encroachment. These assessments should account for credible operational and failure scenarios, including equipment malfunction and extreme weather conditions, to ensure ongoing compliance with airport safeguarding requirements and to mitigate residual aviation safety risk, in accordance with the Act, the Regs, and Guideline F.
2. Should any exhaust stack or vent be designed with a point-of-emission velocity exceeding 4.3 m/s, an operational plume assessment should be undertaken and the relevant CASA assessment and notification processes followed, in accordance with the Regs.
3. It is recommended that, while no operational plume-related visibility impacts are anticipated, appropriate dust suppression and management controls be implemented during any demolition works to mitigate the potential for temporary dust generation in accordance with NASF Guideline F.
4. Final built form, rooftop plant and emissions design should be confirmed at detailed design stage to ensure continued compliance with protected airspace requirements, including any relevant radar terrain clearance considerations.
5. While the development does not constitute a controlled activity, limited procedural consultation with Airservices Australia during detailed design may be undertaken as a precautionary measure to confirm aviation safeguarding outcomes.

4. References

Airservices Australia (n.d.) *Developments at and around airports*. Airservices Australia. Available at: <https://www.airservicesaustralia.com/industry-info/airport-development-assessments/> (Accessed: 13 February 2026).

Australian Government Department of Infrastructure, Transport, Regional Development, Communications and the Arts (2023) *Western Sydney International (Nancy-Bird Walton) Airport – Airspace and flight path design: Draft Environmental Impact Statement, Part A – Background*. Commonwealth of Australia, Canberra. ISBN 978-1-922879-05-9.

Civil Aviation Safety Authority (CASA) (1998) *Civil Aviation Safety Regulations 1998: Regulation 139.180 – Determination that certain proposed objects, structures or emissions sources are a hazard to aircraft operations*. Australian Government. Available at: https://classic.austlii.edu.au/au/legis/cth/consol_reg/casr1998333/s139.180.html (Accessed: 13 February 2026). 1

Civil Aviation Safety Authority (CASA) (2023) *Plume rise assessments (including CASA Form 1247 – Operational Assessment of a proposed plume rise)*. Australian Government. Available at: <https://www.casa.gov.au/plume-rise-assessments> (Accessed: 13 February 2026).

Commonwealth of Australia (1996) *Airports Act 1996*. Federal Register of Legislation, C2004A05061. Available at: <https://www.legislation.gov.au/C2004A05061/latest/text> (Accessed: 12 February 2026).

Commonwealth of Australia (1996) *Airports (Protection of Airspace) Regulations 1996: Regulation 6A – Level of air turbulence*. Australian Government. Available at: https://classic.austlii.edu.au/au/legis/cth/consol_reg/aoar1996446/s6a.html (Accessed: 13 February 2026).

Commonwealth of Australia (2024) *Western Sydney International (Nancy-Bird Walton) Airport – Airspace and flight path design: Environmental Impact Statement, Technical paper 6: Land use and planning*. Available at: https://www.wsiflightpaths.gov.au/pdf-documents/Technical_paper_6_Land_use_and_planning.pdf (Accessed: 12 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (2012) *National Airports Safeguarding Framework*. Australian Government. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework> (Accessed: 12 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (n.d.) *Guideline A: Measures for managing impacts of aircraft noise*. Australian Government, Canberra. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines> (Accessed: 16 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (n.d.) *Guideline B: Managing the risk of building generated windshear and turbulence at airports*. Australian Government, Canberra. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines> (Accessed: 16 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (2023) *Guideline C: Managing the risk of wildlife strikes in the vicinity of airports*. Australian Government, Canberra. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines> (Accessed: 16 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (n.d.) *Guideline D: Managing the risk of wind turbine farms as physical obstacles to air navigation*. Australian Government, Canberra. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines>

vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines (Accessed: 16 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (n.d.) *Guideline E: Managing the risk of distractions to pilots from lighting in the vicinity of airports*. Australian Government, Canberra. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines> (Accessed: 16 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (n.d.) *Guideline F: Managing the risk of intrusions into protected airspace of airports*. Australian Government, Canberra. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines> (Accessed: 16 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (n.d.) *Guideline G: Managing the risk of intrusions into the protected airspace of airports – communication, navigation and surveillance infrastructure*. Australian Government, Canberra. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines> (Accessed: 16 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (n.d.) *Guideline H: Managing the risk of helicopter landing sites*. Australian Government, Canberra. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines> (Accessed: 16 February 2026).

Department of Infrastructure, Transport, Regional Development, Communications and the Arts (2018) *Guideline I: Managing the risk in public safety areas at the ends of runways*. Australian Government, Canberra. Available at: <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework/national-airports-safeguarding-framework-principles-and-guidelines> (Accessed: 16 February 2026).

NSW Department of Planning, Housing and Infrastructure (2014) *Environmental Planning Instrument – Obstacle Limitation Surface*. State Government of New South Wales. Available at: <https://datasets.seed.nsw.gov.au/dataset/epi-obstacle-limitation-surface> (Accessed: 16 February 2026).

NSW Department of Planning, Housing and Infrastructure (2026) *Planning Secretary's Environmental Assessment Requirements: Project Atlas Data Centre Eastern Creek (SSD-101067971)*. New South Wales Government, Sydney, issued 16 January 2026.

NSW Department of Planning and Environment (2021) *Western Sydney Aerotropolis: Explanation of Intended Effect*. State of New South Wales. Available at: <https://www.planning.nsw.gov.au/sites/default/files/2023-03/western-sydney-aerotropolis-eie.pdf> (Accessed: 16 February 2026).

OurAirports (n.d.) *Map of airports in New South Wales, Australia*. Available at: <https://ourairports.com/big-map.html?region=AU-NSW> (Accessed: 12 February 2026).

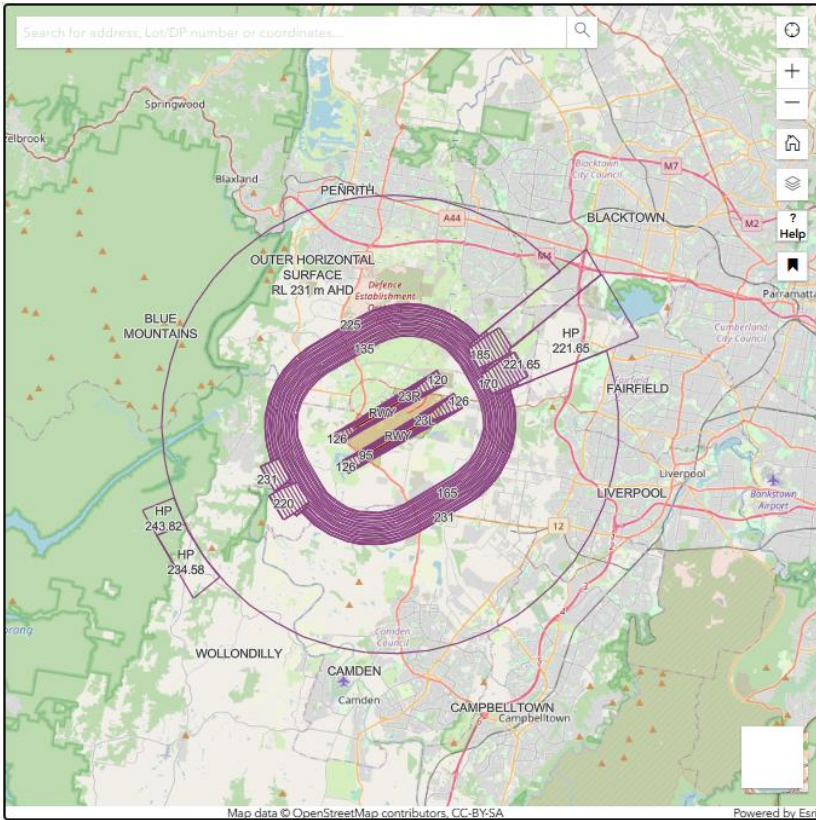
Public Authority for Civil Aviation (2018) *Guidance for obstacle management* (Manual No. 1.2.10, Revision 01). Aerodrome Safety Department – DGCA. Issued 12 June 2018.

Transgrid (2024) *Easement guidelines: Living and working with electricity transmission lines*. Transgrid, New South Wales, June 2024.

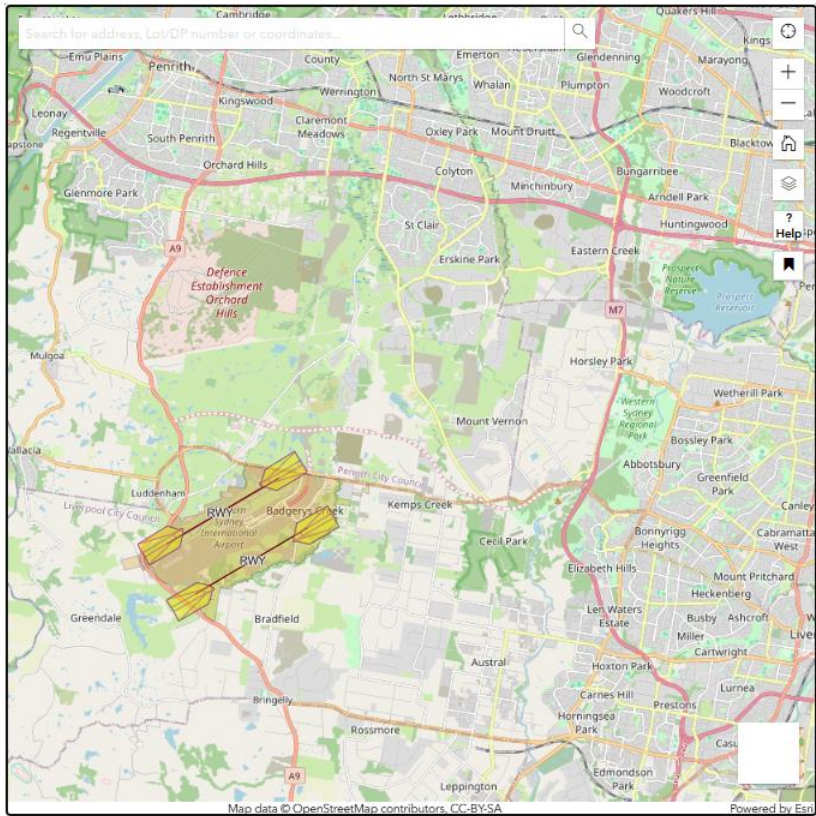
Western Sydney International Airport (WSI) (2025) *Airport safeguarding tool*. Available at: <https://wsiairport.com.au/airport-safeguarding-tool> (Accessed: 12 February 2026).

A.1 Appendix A.1 – Airport Safeguarding Tool Outputs

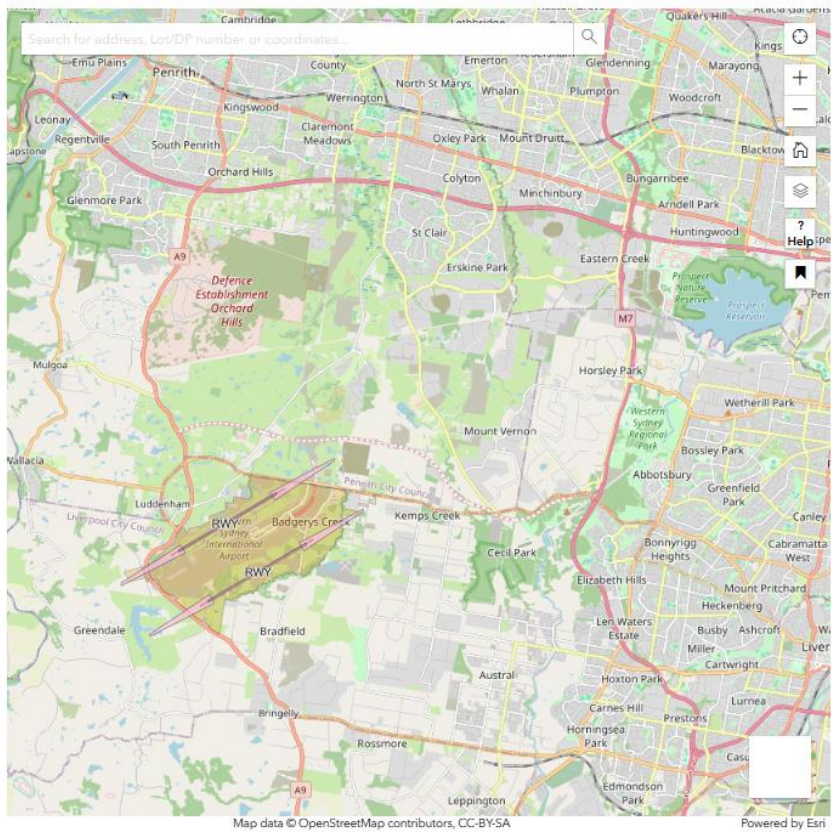
OLS



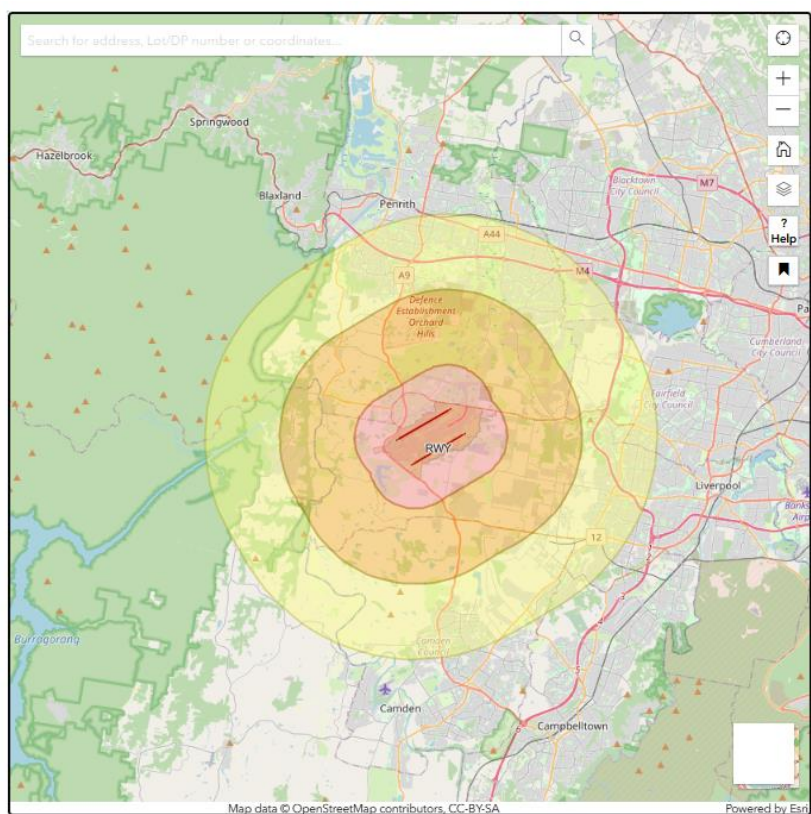
Glide Path (Building Restricted Area)



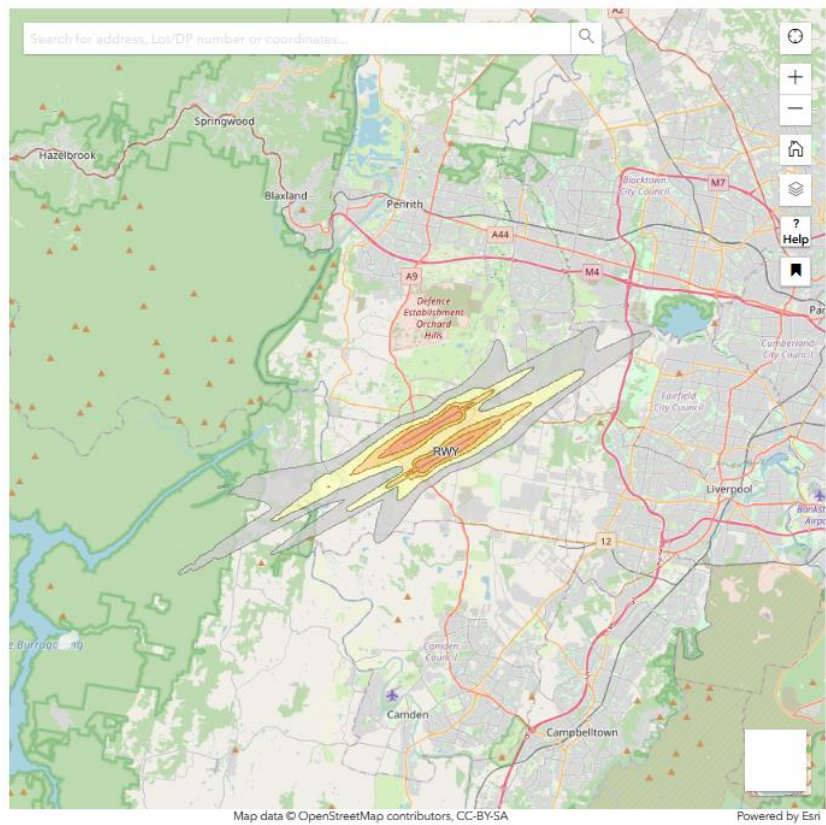
Public Safety Area



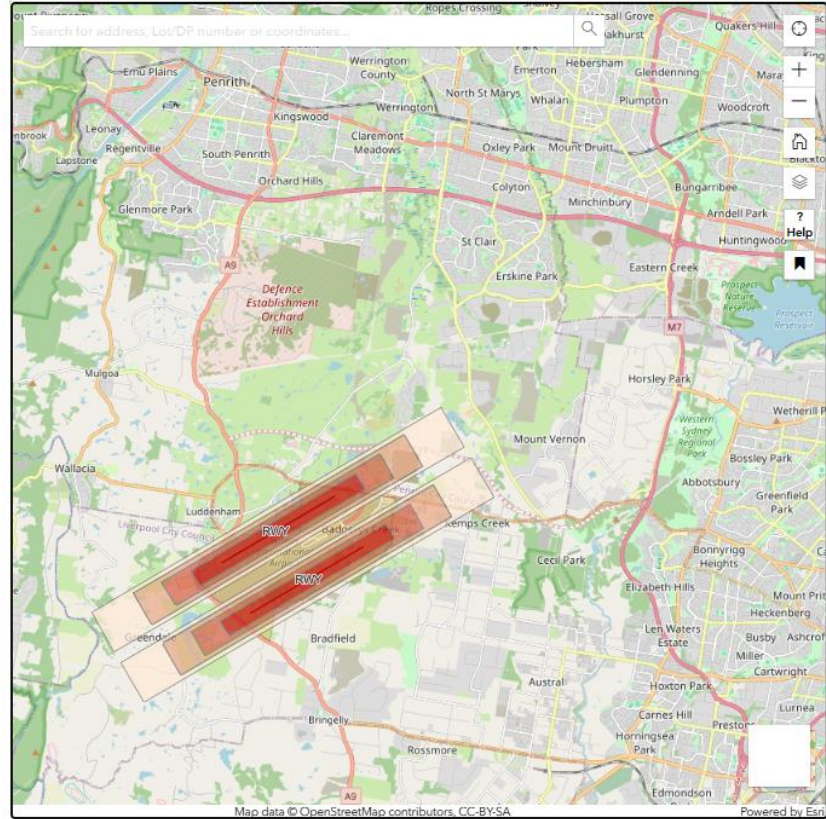
Wildlife Buffer Zone



ANEC Noise Contour



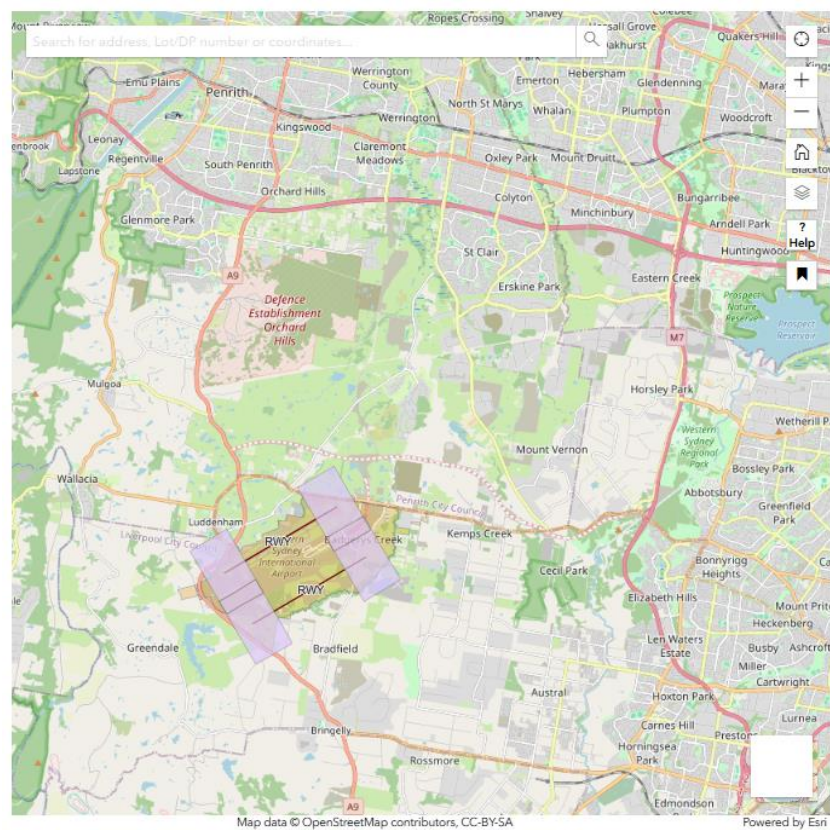
Lighting Intensity Zones



Lighting Buffer Area

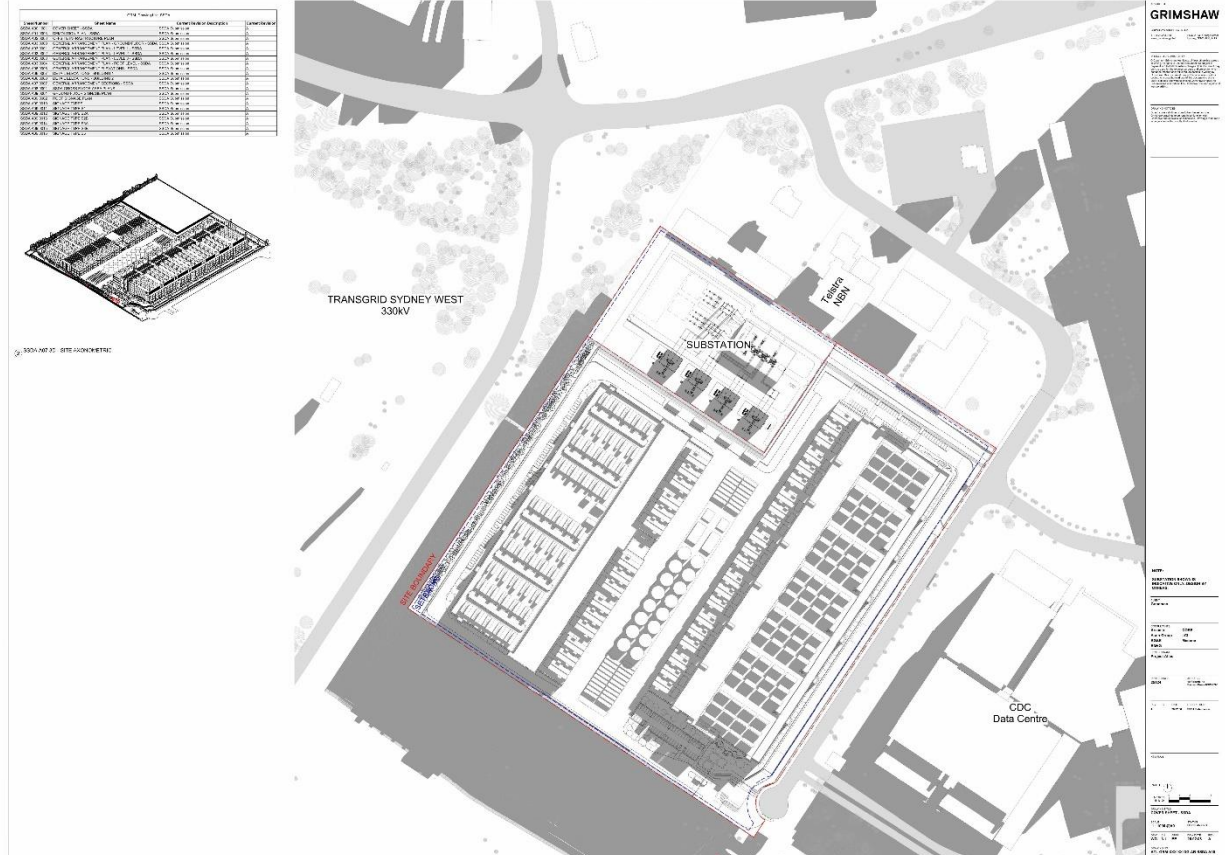


Windshear Assessment Zone



A.2 Appendix A.2 – Built Form and Height

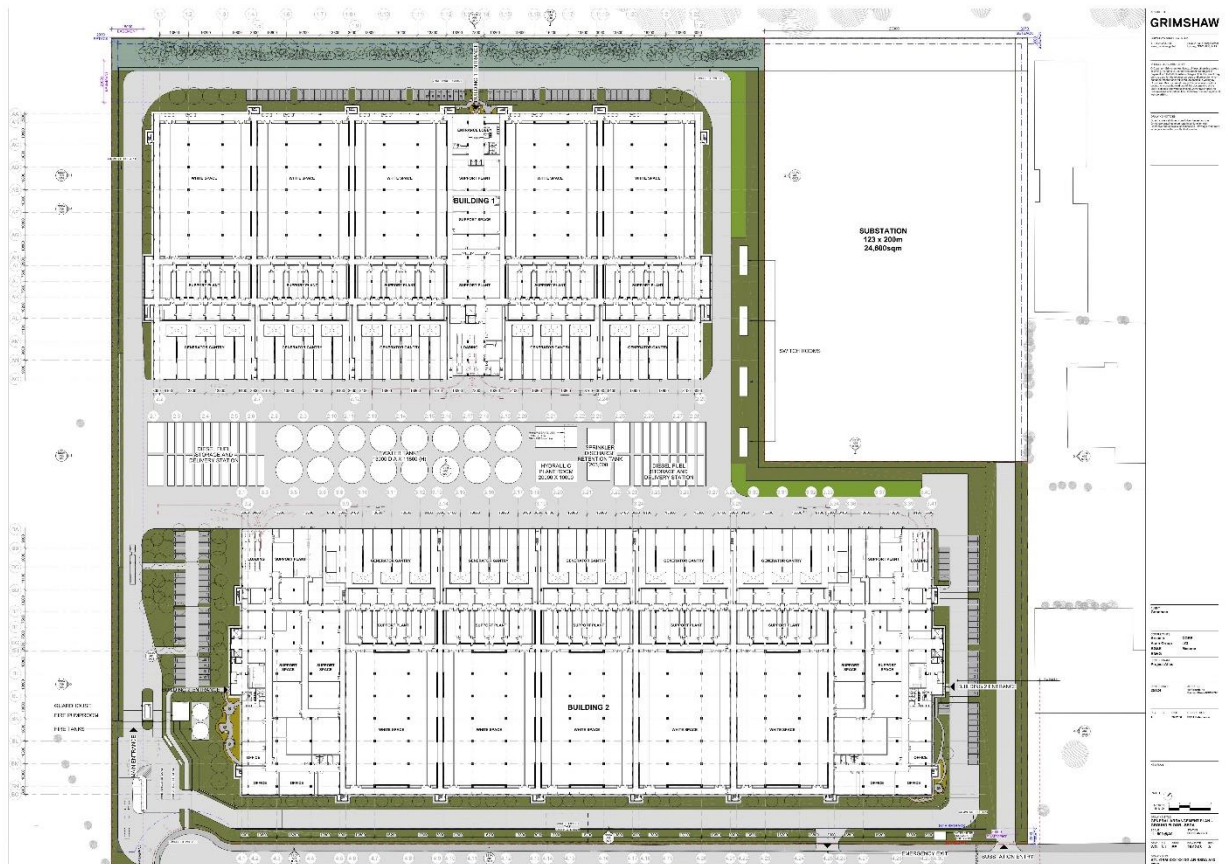
GRIMSHAW drawing number: ATL-GRM-XXX-XX-DG-AR-SSDA A00 1001, rev A



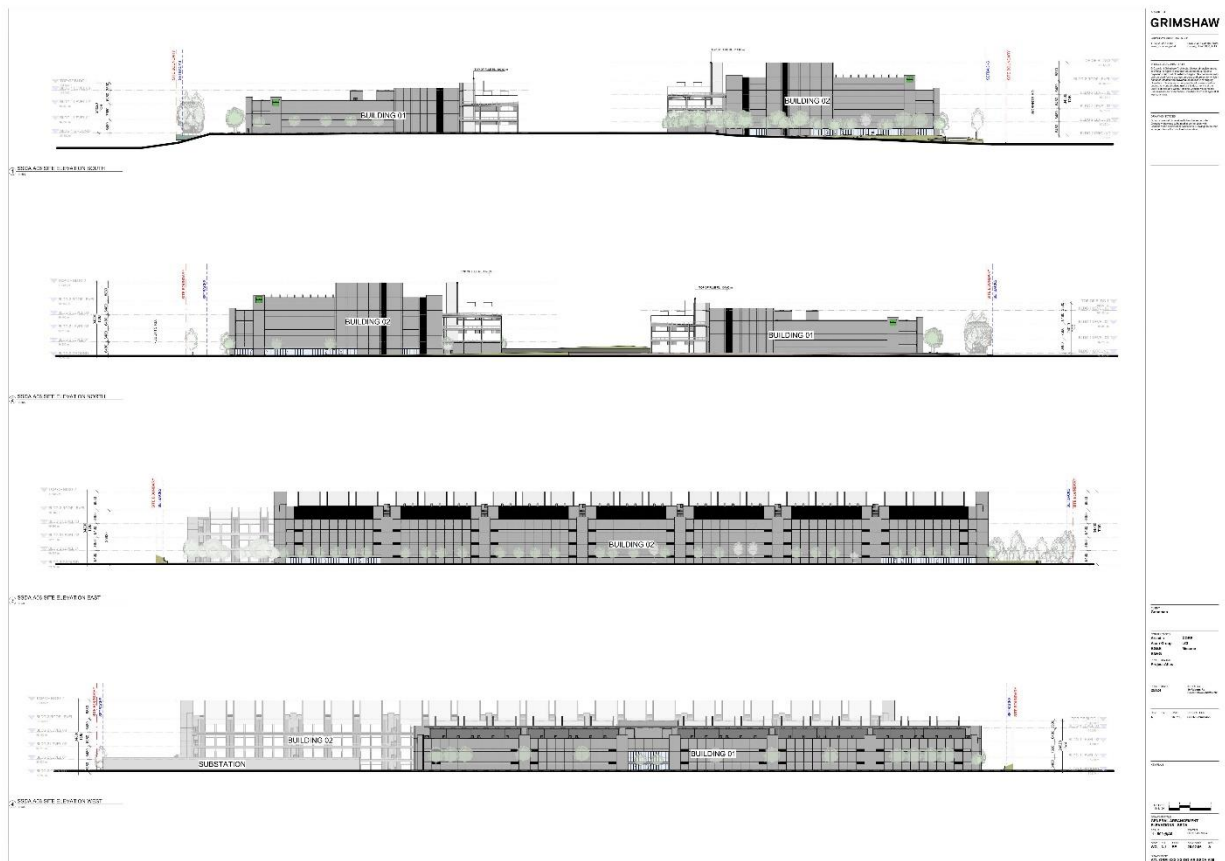
GRIMSHAW drawing number: ATL-GRM-XXX-XX-DG-AR-SSDA A02 0003, Rev A



GRIMSHAW drawing number: ATL-GRM-XXX-XX-DG-AR-SSDA A03 0000, Rev A



GRIMSHAW drawing number: ATL-GRM-XXX-XX-DG-AR-SSDA A06 0006, rev A



A.3 Appendix A.3 Conformance to State Environmental Planning Policy (Precincts—Western Parkland City) 2021

Table 4-1: Fulfillment of SEPP 2021 Requirements

SEPP 2021 Clause	Clause Summary	Coverage
4.17 Aircraft noise	This section aims to restrict noise-sensitive development near the Airport, minimise aircraft noise impacts where such development occurs, and protect the Airport's safe, efficient 24-hour operations. Development consent must not be granted for noise-sensitive development on land within an ANEF or ANEC contour of 20 or greater, despite provisions in relevant housing, education, and childcare planning policies. An exception applies to new dwelling houses where, immediately before this Chapter commenced, dwellings were not present but were permitted, and where indoor design sound levels under AS 2021—2015 are satisfied. The restriction does not apply to subdivision applications lodged before 1 October 2020. ANEF and ANEC contours are defined by endorsed noise exposure maps. Noise-sensitive development includes residential accommodation, education and childcare facilities, hospitals, places of worship, exhibition homes or villages, funeral homes, and similar uses.	Addressed in Section 2.3 of this report.
4.18 Building wind shear and turbulence	This section aims to protect Airport operations from wind shear and turbulence caused by buildings. It applies to development within the Windshear Assessment Trigger Area that penetrates the 1:35 surface. Development consent must not be granted unless the consent authority has consulted the relevant Commonwealth body. A development penetrates the 1:35 surface where the distance from the runway centreline to the building is equal to or less than 35 times the building's height above runway level.	Addressed in Section 2.4 of this report.
4.19 Wildlife hazards	This section aims to protect Airport operations from wildlife hazards associated with nearby development. Development consent must not be granted for specified development within the 13-kilometre wildlife buffer zone unless the consent authority has consulted the relevant Commonwealth body, considered a detailed wildlife risk assessment provided by the applicant, and is satisfied that effective mitigation measures will be implemented. Certain high-risk developments, including livestock processing, turf farming, and outdoor organic waste facilities, are prohibited within the 3-kilometre wildlife buffer zone. The buffer zones are defined by the Wildlife Buffer Zone Map and do not constitute buffer areas under relevant State planning policies.	Addressed in Section 2.5 of this report.
4.20 Wind turbines	This section regulates wind turbines and wind monitoring towers within 30 kilometres of the Airport to protect aviation safety. Wind turbines and non-airport-related wind monitoring towers are prohibited within the 3-kilometre zone. In the 3-30 kilometre zone, development consent for large wind monitoring towers or wind turbines must not be granted unless the consent authority has consulted the relevant Commonwealth body. Wind turbine development also requires a risk assessment and demonstrated mitigation of impacts on the safe operation of the Airport. The zones are defined by the Wind Turbines Map and are not planning buffer areas under relevant State policies.	Addressed in Section 2.6 of this report.
4.21 Lighting	This section protects Airport operations from pilot distraction caused by lighting and reflective effects. Development consent must not be granted for specified development involving external lighting within the 6-kilometre Lighting Intensity Radius, Light Control Zones, or Runway Boundary unless the consent authority has consulted the relevant Commonwealth body. This includes external lighting associated with major roads, freight and industrial uses, major or outdoor recreation facilities, and construction lighting that may be obtrusive or cause light spill beyond the site.	Addressed in Section 2.7 of this report.
4.22 Airspace operations	This section protects the safe and ongoing operation of the Airport by regulating development that may penetrate prescribed airspace. It applies to controlled activities on land shown on the Obstacle Limitation Surface Map under the Airports Act 1996. Development consent must not be granted unless the consent authority has consulted the relevant Commonwealth body and received advice that the development will not penetrate prescribed airspace, or that any penetration is not objected to.	Addressed in Sections 2.1.2 and 2.1.3 of this report.

SEPP 2021 Clause	Clause Summary	Coverage
4.23 Public safety	This section regulates development in areas subject to significant public safety risk from Airport operations. A broad range of sensitive, high-occupancy and community uses is prohibited within the mapped public safety area. Development for other purposes may only be approved where the consent authority has considered a written risk assessment addressing emergency and incident scenarios, anticipated occupancy levels, and land-use compatibility, and is satisfied that risks to people will be adequately mitigated, including through limitations on the number of persons or vehicles.	Addressed in Section 2.11 of this report.
4.23A Operation of certain air transport facilities	This section manages development that may affect the operation of air transport facilities associated with the Airport. Development consent must not be granted for land within the Building Restricted Area unless the consent authority has consulted the relevant Commonwealth body and is satisfied that the development will not adversely impact communication, navigation, or air traffic control facilities or related Airport infrastructure.	Addressed in Section 2.9 of this report.
Part 4.7 Division 3 “Aerotropolis certificates”	Division 3 sets out how Aerotropolis certificates work. A certificate must accompany a complying development certificate application when the development is on land covered by the Chapter and a master plan is in force. Applications are made to the Planning Secretary by the development proponent (with the landowner’s consent) using the approved form, and must include the applicant’s details, the land’s address/title particulars, and a description of the development. The Planning Secretary must decide within 30 days to issue or refuse the certificate, and there is no appeal or review. A certificate can only be issued if a master plan applies to the land and the proposal is consistent with that master plan; otherwise the applicant must be given a chance to amend the application. Certificates last 5 years.	Aerotropolis Assessment not required since the subject site is outside the land application map (See Appendix A.4).

A.4 Appendix A.4 – SEPP 2021 Map Contours

