

Environmental Impact Statement

*SSD-105499958 – Lot 208, 209 & 210
Automated Distribution Centre*

June 2026

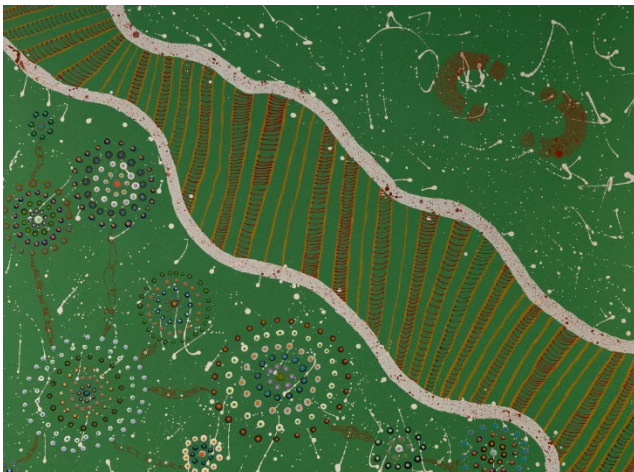
Urbis staff responsible for this report were:

Director	Simon Wilkes
Associate Director	Michael Beale
Senior Consultant	Zachary Quintal
Project Code	P0064918
Report Number	Final – June 2026

Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

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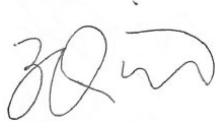
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EIS Declaration

Project details		
Project Name	WSI3 Automated Distribution Centre	
Application number	SSD-105499958	
Address	475 Badgerys Creek Road, Bradfield	
Applicant details		
Applicant name	Urbis Ltd	
Applicant address	Level 8, 123 Pitt Street Sydney NSW 2000	
Environment Impact Statement (EIS) prepared by		
Name	Michael Beale – Associate Director	Zachary Quintal – Senior Consultant
Qualification	MA Urban and Regional Planning (University of Westminster)	Bachelor of Planning, UNSW
Signature	 	
Declaration by Registered Environmental Assessment Practitioner		
Name	Simon Wilkes – Director	
Qualification	Bachelor (Hons.) – Urban and Regional Planning. Curtin University of Technology	
Registration number	5948	
Organisation registered with	Planning Institute of Australia	
The undersigned declares that this EIS:		
▪ has been prepared in accordance with Part 8 Division 5 of the Environmental Planning and Assessment Regulation 2021. ▪ contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates. ▪ does not contain information that is false or mis-leading; ▪ addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project. ▪ identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments. ▪ has been prepared having regard to the Department's State Significant Development Guidelines – Preparing an Environmental Impact Statement. ▪ contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development. ▪ contains a consolidated description of the project in a single chapter of the EIS;		

-
- contains an accurate summary of the findings of any community engagement; and
 - contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
-

Signature

A handwritten signature in blue ink, appearing to read 'S Wilkes', with a small dot at the end.

Simon Wilkes REAP: 5948

19 June 2026

Glossary and Abbreviations

Reference	Descriptions
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACM	Asbestos Containing Material
AEP	Annual Exceedance Probability
AHD	Australia Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
ANEF	Australian Noise Exposure Forecast
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
ASS	Acid Sulphate Soils
BAM	Biodiversity Assessment Method
BC Act	Biodiversity Conservation Act 2016
BC Reg	Biodiversity Conservation Regulation 2017
BDAR	Biodiversity Development Assessment Report
CBD	Central Business District
CDA	Concept Development Application
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
COPC	Contaminants of Potential Concern
CPCP	Cumberland Plain Conservation Plan
CTMP	Construction Traffic Environmental Plan
CWC	Connecting with Country
DCP	Development Control Plan
DP	Deposited Plan
DPHI	New South Wales Department of Planning, Housing and Infrastructure
DSI	Detailed Site Investigation
EDC	Estimated Development Cost
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979

Reference	Descriptions
EPA Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EPA	New South Wales Environment Protection Authority
EPI	Environmental Planning Instrument
ESCP	Erosion and Sediment Control Plan
ESD	Ecologically Sustainable Development
GANSW	Government Architect New South Wales
GFA	Gross Floor Area
GTP	Green Travel Plan
HIPAP	Hazardous Industry Planning Advisory Paper
HIS	Heritage Impact Statement
LAeq	A frequency-weighted Equivalent Continuous Sound Level
LEC	Land Environment Court New South Wales
LEP	Local Environmental Plan
LGA	Local Government Area
LSPS	Local Strategic Planning Statement
MNES	Matters of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NML	Noise Management Level
NRAR	Natural Resource Access Regulator
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OEMP	Operational Environmental Management Plan
R&H SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
PAD	Potential Archaeological Deposit
PBP	Planning for Bushfire Protection
PCT	Plant Community Type
PMF	Probable Maximum Flood
POM	Plan of Management
PSI	Preliminary Site Investigation

Reference	Descriptions
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
SAII	Serious and Irreversible Impacts
SARs	Commonwealth Supplementary Assessment Requirements
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIDRA	Signalised & Unsignalised Intersection Design and Research Aid
Site	Part Lot 102 and Lot 105 in DP 1316278
SSD	State Significant Development
SSDA	State Significant Development Application
T&I SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
UXO	Unexploded Ordnance
VIA	Visual Impact Assessment
VIS	Vegetation Integrity Score
WSAP	Western Sydney Aerotropolis Plan
WSAPP	Western Sydney Aerotropolis Precinct Plan
WCM	Water Cycle Management
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

Executive Summary

Project Overview

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Ltd (**Urbis**) for Urbis (**the applicant**). The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of a State Significant Development Application (**SSDA**) for the site at 475 Badgerys Creek Road, Bradfield (the site).

The site is located on Dharug Country, and we acknowledge the Dharug people, their elders past and present and their deep and continuing connection to their land. In preparing this EIS we acknowledge the importance of a Country-centred approach to the design, guided by Aboriginal people, who know that if we care for Country, Country will care for us.

The SSDA seeks consent for

- Construction and operation of an automated distribution centre (**ADC**) comprising a total of 195,829m² gross floor area (**GFA**), including warehouse, ancillary office and associated fitout and site facilities
- Loading docks with associated waiting bays, truck parking, wash bay, and container storage
- New vehicle access points, accommodating inbound truck entry/exit, outbound truck entry/exit and car park entry/exit
- Multi-deck carpark and at-grade parking providing on-site parking including disabled parking spaces
- Deep soil area 27,057m² (15.8% of site area)
- Building height of 25.02m (based on existing site levels)
- Proposed operation 24 hours per day, 7 days a week.

As the proposal has an estimated development cost (**EDC**) of more than \$30 million, the development triggers State Significant Development (**SSD**) pursuant to Schedule 1 section 29 of *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**).

An aerial photograph of the site detailing the development footprints is provided at Figure 1.

Figure 1 Aerial photograph



Source: Urbis, 2026

The Project Story

The proposed automated distribution facility (**ADC**) is intended to harness leading edge technology to drive supply chain efficiencies but also stands to be a landmark investment in Western Sydney and specifically the Aerotropolis precinct.

The Western Sydney International Airport is planned to open in 2026. Catalytic infrastructure including the North-South Metro and the M12 motorway will be operating to support the efficient functioning of the Airport. Developments such as this at Badgerys Creek will leverage off this significant infrastructure investment and showcase exactly what long terms plans for the Aerotropolis are intended to achieve.

The site is zoned ENT Enterprise under the WCP SEPP. This zone supports a variety of enterprise and light industrial land uses. While the site could accommodate several permissible smaller footprint developments, this is not an optimal outcome. The proposed ADC provides an efficient use of the site by proposing a large-scale, consolidated warehouse and distribution operation in a highly accessible location. The proposed ADC represents the intended land use outcomes for the Western Sydney Aerotropolis.

The proposed ADC directly relates and responds to the outcomes of the IPG Masterplan. The relationship between this project and the IPG Masterplan is discussed in Section 1.3 of this EIS.

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Figure 3 Photomontage



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Community and Stakeholder Engagement

Community and stakeholder engagement has been undertaken by Urbis and the Project Team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Adjoining landowners and occupants
- Government, agency and utility stakeholders

The outcomes of the community and stakeholder engagement have been incorporated into the proposed development and are discussed in detail at Section 5 of this EIS and the Engagement Outcomes Report at Appendix II.

Strategic Justification

The EIS has assessed the project against the requirements of the Secretary's Environmental Assessment Requirements (SEARs) (Appendix A), and the relevant planning instruments and policies (Section 4 and Appendix B).

The key issues identified within the SEARs have been assessed in **Section 5** of the EIS. This assessment has been informed by specialist reports which include recommendations and mitigation measures. The assessment of key issues includes the mitigation measures which can be adopted to ensure the project does not result in any significant impacts. These mitigation measures are included at Appendix F.

The project is a positive development outcome for the site and surrounding area for the reasons outlined in Table 2.

Table 1 Summary of Development Outcomes

Matter	Response
Connecting with Country	The project has been informed by an understanding of the system of Country and the importance of embedding cultural knowledge into the planning, design, and development of the site. The approach to designing with Country utilises the GANSW Connecting with Country Framework as well as the IPG Master Plan Designing with Country Framework. Refer to Section 3.4 of this EIS for further detail.
Design Excellence / Better Placed	Clause 4.33 of the WPC SEPP and the SEARs issued for the project mandates that the development demonstrate design excellence. An assessment against the relevant considerations of these two requirements has been conducted in the Urban Design Report and EIS. This has incorporated a review of the proposed design in accordance with the IPG Design Quality Strategy (DQS), which triggers a peer review of a 'large scale' development by a single architect. The ADC project is categorised as a large-scale project, requiring an independent peer review be undertaken. Accordingly, a detailed Peer Review has been undertaken by Watson Young Architects, which is included at Appendix J. The review confirms that the proposed design is generally compliant with the Section 14 DQS of the IPG Master Plan. Accordingly, the proposal has adequately demonstrated that the design exhibits design excellence and no further assessment is required.
The project is consistent with strategic planning policies	▪ Greater Sydney Region Plan: A Metropolis of Three Cities ▪ Our Greater Sydney 2056: Western City District Plan ▪ Western Sydney Aerotropolis Plan ▪ Liverpool Local Strategic Planning Statement

Matter	Response
The project is consistent with State and local development controls	The development is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including; ▪ Environmental Planning and Assessment Act 1979 (EP&A Act) ▪ Environmental Planning Assessment Regulation 2021 (the Regulations) ▪ State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) ▪ State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP) ▪ State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP) ▪ State Environmental Planning Policy (Biodiversity and Conservation) 2021 (B&C SEPP) ▪ State Environmental Planning Policy (Sustainable Buildings) 2022 (SB SEPP) ▪ State Environmental Planning Policy (Precincts—Western Parkland City) 2021 (WPC SEPP) (subject to amendments proposed by the IPG Master Plan) ▪ Western Sydney Aerotropolis Precinct Plan (subject to amendments proposed by the IPG Master Plan) ▪ Western Sydney Aerotropolis Development Control Plan (subject to amendments proposed by the IPG Master Plan) ▪ Aerotropolis Special Infrastructure Contribution (SIC). ▪ Connection with Country Framework for the Aerotropolis ▪ Aviation Safeguarding Guidelines for the Aerotropolis
The project minimises impacts on the natural environment	The ADC is situated within an area of the IPG site that is highly modified and reflective of its former use for intensive agriculture (poultry farming). The land, which is primarily zoned for employment uses, is located near several future Federal and State significant transport infrastructure projects. As has been demonstrated in the IPG Master Plan and within this EIS, the project will not result in any adverse environmental or social impacts to the local amenity. The project has been informed by detailed environmental assessments covering themes such as acoustic, air quality, stormwater management, contamination, hazardous materials, aviation, waste and lighting impacts. Subject to the recommended mitigation measures to any of these potential impacts, in addition to the proposed sustainability, flora and fauna as well as civil/stormwater management plans provided for under the IPG Master Plan, the project minimises impacts to the natural environment.
The project minimises impacts on the built environment	The proposed design has been prepared to align with the DQS prepared for the broader IPG Master Plan land. The DQS has sought to ensure that new development on the site responds to the precinct-wide road network, proposed major infrastructure projects, key agency feedback, and neighbouring landowners. This ensures that the proposal aligns with the overall Precinct Plan and can be developed considering access and staging of adjacent development. The proposed development is consistent with the vision of the Aerotropolis Precinct and provides for the orderly development of future stages of development. Accordingly, the project has been prepared to minimise any visual or built form impacts and deliver a positive, amenity outcome.

Matter	Response
The project has positive social impacts	The project is consistent and compatible with the sites zoning and future strategic direction as envisioned within the Western Sydney Aerotropolis Plan and Liverpool LSPS. The surrounding areas are predominantly zoned for enterprise uses. The site is adjacent to major motorways and other planned industrial developments. The Project will have positive social impacts as it will contribute to long-term employment generation and will reinstate the industry specific skills, knowledge and capacity associated with warehouse and logistic centres within NSW in an area of the State specifically designated for such uses.
The project has positive economic impacts	The project represents a substantial investment in the Aerotropolis. It is projected to create 3,123 jobs during construction and an additional 807 equivalent jobs during the operational phase. The site's strategic location near the expanding residential population of Western Sydney offers the prospect of jobs closer to home, contributing to goal of achieving a '30 Minute City' concept outlined in the Greater Sydney Region Plan.
The site is suitable for the project	▪ The proposed warehouse and distribution centre land use is permissible in the Enterprise Zone. ▪ The development aligns with the zone objectives as outlined in the WPC SEPP. ▪ The project is in line with relevant State and Local strategic and statutory policies. ▪ The project, sitting within the broader IPG Master Plan site, can access the necessary infrastructure services to support its use, noting the responsibility of delivering this infrastructure sits with IPG. ▪ The detailed impact assessment conducted for the project demonstrates that the proposed development can proceed without any unacceptable environmental impact, provided the relevant management/mitigation measures are implemented which will be completed at the construction certificate stage.
The project is in the public interest	▪ The project aligns with both State and Local strategic plans, demonstrating substantial consistency with all relevant planning controls. ▪ The project is set to be a significant job creator, providing over 3,930 direct employment opportunities during both construction and post construction phases. ▪ The project is a significant catalyst for further investment in the Aerotropolis Precinct

The EIS demonstrates that the project has significant merit and should be approved subject to the implementation of the mitigation measures described in this report and supporting documents.

1 Introduction

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Ltd (**Urbis**) for Urbis (**the applicant**). The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (**DPHI**) in support of a State Significant Development Application (**SSDA**) for the site at 475 Badgerys Creek Road, Bradfield (the site).

The site is located on Dharug Country, and we acknowledge the Dharug people, their elders past and present, and their deep and continuing connection to their land. In preparing this EIS we acknowledge the importance of a Country-centred approach to the design, guided by Aboriginal people, who know that if we care for Country, Country will care for us.

1.1 Applicant Details

The applicant details for the proposed development are listed in Table 2.

Table 2 Applicant Details

Proponent	Details
Postal Address	Urbis Ltd Angel Place Level 8, 123 Pitt Street Sydney NSW 2000 Australia (Gadigal Country)
ACN	105 256 228
Nominated Contact	Michael Beale Associate Director mbeale@urbis.com.au (02) 8233 7617

1.2 The Project

The SSDA seeks consent for a proposed warehouse or distribution centre (as defined), referred to throughout this EIS as an automated distribution facility (**ADC**). As the proposal has an estimated development cost (**EDC**) of more than \$30 million, the proposed development is State Significant Development (**SSD**) pursuant to Schedule 1 section 29 of the *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**).

The key features of the project are summarised below:

- Construction and operation of an automated distribution centre (**ADC**) comprising a total of 195,829m² gross floor area (**GFA**), including warehouse, ancillary office and associated fitout and site facilities
- Loading docks with associated waiting bays, truck parking, wash bay, and container storage
- New vehicle access points, accommodating inbound truck entry/exit, outbound truck entry/exit and car park entry/exit
- Multi-deck carpark and at-grade parking providing on-site parking including disabled parking spaces
- Deep soil area 26,725m² (15.5% of site area)
- Building height of 25.02m (based on existing site levels)
- Proposed operation 24 hours per day, 7 days a week.

A detailed description of the proposed works is provided in Section 3 of this EIS and illustrated within the Architectural Plans at Appendix H. The key objectives for the proposed development and the way in which these have been achieved are summarised in Table 3.

Table 3 Project Vision and Objectives

Objective	Proposed Development
Provide a purpose-built facility which is highly automated and fit for purpose	The proposed development will be highly automated. The warehouse will have a GFA of 195,829m ² and approx. 24m above finished ground level at its highest point.
Provide high quality facilities for staff and visitors	The office design has been carefully considered with the future user in mind by being located at the south of the site. This provides the most convenient access point for pedestrians. High quality end of trip facilities and communal areas with large, landscaped areas that provide amenity for staff working at the facility.
Design quality	The proposed development has been designed and assessed as demonstrating design quality through four key design quality outcomes, including: ▪ Connecting with Country ▪ Urban form ▪ Architecture ▪ Sustainability The Architectural Design Report included within this EIS provides a comprehensive compliance assessment and explains how the proposed development responds to specific design elements and design quality principles. In addition to this, and as required under the IPG Master Plan design quality statement, an independent peer review will be undertaken to ensure the design aligns with the objectives of the design quality statement.
Contribute to the vision for aerotropolis and economic growth of the region	The construction of the project has a forecast employment contribution throughout the community of 3,123 jobs across the construction duration comprising: ▪ 2,155 directly employed on site ▪ 640 manufacture and supply of intermediate goods and services ▪ 329 indirect supply of goods and services Once operational, the proposed development is expected to generate 807 full-time jobs, including 724 warehouse roles and 83 office related roles. It is anticipated that a maximum of 686 staff would be on site at one time during operation.
Sustainability	The proposed development is dedicated to achieving a sustainable, net zero future. Initiatives including on site renewable energy, passive design strategies and energy efficient infrastructure and equipment will be implemented in an effort to achieve net zero emissions and create a more sustainable built environment.

A map of the site in its regional setting is provided as Figure 4.

Figure 4 Regional Context



Source: Urbis, 2026

1.3 Project Background

1.3.1 Master Plan Background

The *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* (WPC SEPP) is the principle Environmental Planning Instrument (**EPI**) for the site as well as the entire Western Sydney Aerotropolis. The SEPP is supported by 4 other key planning documents:

- Western Sydney Aerotropolis Precinct Plan (**Precinct Plan**)
- Western Sydney Aerotropolis Development Control Plan (**DCP**)
- Western Sydney Aerotropolis Special Infrastructure Contribution (**SIC**)
- Liverpool Aerotropolis s7.12 Contributions Plan (**CP**)

The SEPP prescribes the following key development controls applying to development on the site:

- Zoning: The site is zoned ENT Enterprise
- Precinct Plan prescribes a height limit of 52.5m from existing ground level
- OLS is 125.5m measures from reduced level (**RL**)

Clause 4.39 of the WPC SEPP requires that:

“Development must be consistent with the Precinct Plan. Where development proposed is inconsistent with the Precinct Plan, the inconsistency is to be minor, and justified as being demonstrably unreasonable or unnecessary, and there are sufficient environmental planning grounds to justify the inconsistency.”

Importantly, it is noted that a Master Plan for the IPG site was approved by DPHI in July 2025 in accordance with Section 4.41 of the WPC SEPP, which sought amendments to the WPC SEPP, Aerotropolis Precinct Plan and DCP.

As per the Master Plan requirements, DPHI’s appointed Technical Assurance Panel (**TAP**) coordinated the initial drafting of the Master Plan. The Master Plan was proposed as an alternative development approval pathway for the IPG site and has been prepared in accordance with section 4.41 of the *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* (**WPC SEPP**).

Key elements of IPG's Master Plan as it relates to the proposal site is as follows:

- Re-alignment of the Eastern Ring Road (**ERR**) and Bradfield Metro Link Road (**BMLR**): The approved realignments do not impact on the road hierarchy of both roads, or any road connecting into these roads, and will serve the same purposes identified in the Precinct Plan. The realignment is an opportunity to align with property boundaries, where feasible, for a better place and design outcome, as well as more feasible lots for development and subdivision. Associated amendments were approved to the land use structure plan, including adjustments to the land use layout, open space network and stormwater/riparian network in response to the new road layout.
- Amendment to the permissible building height and OLS: The IPG Master Plan sought to vary the existing height controls contained in the Aerotropolis Precinct Plan, proposing a maximum building height for potential high-bay and multi-storey warehousing of up to approximately 52.5m as detailed in the Master Plan. There are two parcels of land within the IPG Master Plan identified as being suitable for high-bay warehousing, referred to as the 'western parcel' and the 'eastern parcel'. The proposal site is located in the western parcel.

The Master Plan sought multiple amendments to the statutory planning context which currently applies to the site, including:

- *Western Parkland City SEPP*
- *Western Sydney Aerotropolis Precinct Plan May 2023*
- *Western Sydney Aerotropolis Development Control Plan Phase 2 (Phase 2 DCP)*

The proposed ADC development will respond to the provisions of the IPG Master Plan and updated Precinct Plan, and do not propose any changes to the approved super lot layouts, maximum height of buildings or overall road network.

The approved IPG Master Plan includes a Complying Development Code that aims to streamline the delivery of future development at the site through. The IPG Complying Development Code includes development standards for the following specified works that are relevant to the proposed development:

- Subdivision Code
- Earthworks Code
- Retaining Walls Code
- Public Domain and Landscaping Code
- Local Roads and Infrastructure Code
- Local Stormwater Works Code
- Other Subdivision Code
- Tree and Vegetation Management Code
- Temporary Public Roads, Construction and Haul Roads and Ancillary Works

Approval for additional enabling works required to facilitate development across the IPG Master Plan site (including on the application site) is currently being secured separately by IPG pursuant to the relevant Complying Development Codes.

The scope of works included within the CDC application to facilitate development at the proposal site comprises the following:

- Approval for the subdivision of the IPG site pursuant to the Subdivision Code. Accordingly, the proposed development as detailed within this EIS and subject to a future SSDA does not include any subdivision works.
- Access to the proposed development will be provided via the Stage 2 precinct Road 02 and Road 03 as envisaged by the IPG Master Plan. Approval for the new Road 02 and Road 03 interfacing with the ADC

development will be secured via CDC (pursuant to the Local Roads and Infrastructure Code) and does not form part of the scope of works subject to the future SSDA as described within this EIS. IPG will be responsible for the delivery of these new local roads.

- Bulk earthworks will be undertaken by IPG to create a graded 'pad' on the site that is 'ready-made' for the future ADC development the subject of the SSDA. IPG is responsible for securing approval and delivering the bulk earthworks required to facilitate development on the site including the development pad, temporary sediment basin arrangements and permanent regional basins (external to the site), retaining walls, perimeter batter transitions and benching to tie into the retaining wall and road level interfaces including driveway accesses to the proposed development site up to the property boundary. Accordingly, the SSDA works are expected to be limited to on-lot trimming, local grading and final level adjustments required to facilitate the proposed development.
- Utilities infrastructure required to service the proposed development and the remainder of the IPG Master Plan will also be delivered separately by IPG. Utilities delivered as part of the Stage 2 precinct works will be extended to provide the external servicing interfaces for the proposed development. This includes a Zone Substation in the southern part of the Master Plan to be commissioned prior to completion of Stage 2. Only minor on-lot utilities connection works are therefore required as part of the development proposed by the Applicant as described within this EIS and subject to the future SSDA.
- Tree removal will be undertaken by IPG alongside the subdivision works to ensure that the site is 'ready-made' for future development. This does not form part of the proposed scope of works to be undertaken by the Applicant.
- Lot 105 will be removed prior to completion of Stage 2.

A separate DA (DA424/2024) was approved by Liverpool City Council in March 2026 for the construction of a roundabout and associated engineering infrastructure on Badgerys Creek Road.

A separate Sydney Water REF under Part 5 of the EP&A Act is also being prepared to address the works required to convert the temporary construction sediment basins (addressed under CDC) into regional WSUD and MARV basins in accordance with Sydney Water requirements.

It is anticipated that these approvals will be in place well in advance of the SSDA works commencing, to enable the effective sequencing of lead in and on-lot infrastructure needed to support the proposed development.

Figure 5 IPG Master Plan



1.3.2 Project Timeline

A timeline of the project is provided in Table 4. Whilst community and stakeholder engagement is discussed in Section 5 the consultation undertaken with key agencies is detailed in Table 4.

Table 4 Project Timeline

Relevant Matter	Date
Preliminary engagement with DPHI regarding SSDA process	19 December 2025
Request for SEARs submitted to DPHI	23 January 2026
SEARs issued by DPHI	2 March 2026
Lodgement of Test of Adequacy package	13 May 2026

A summary of discussions with key agencies prior to lodgement of the SSDA is provided in Table 5.

Table 5 Agency Engagement

Agency	Date	Comments/Feedback
DPHI	19 December 2025	An online introductory meeting was held with Urbis. The objective of the meeting was to discuss the proposed development, while flagging at a high-level relationship with the Master Plan. Whilst no formal feedback was provided, the following was noted:

Agency	Date	Comments/Feedback
		- SEARs request needs to clearly explain the reports which will be utilised as part of the SSDA which formed part of the masterplan. - The design quality strategy process will be confirmed by DPHI
SEARs Consultation	February 2026	As part of the request for SEARs, DPHI invited and received comments from the following parties: - NSW Department of Climate Change, Energy, the Environment and Water (Biodiversity, Conservation Programs, Heritage, and Regulation Group, Heritage NSW, Water Assessments Divisions) - Bradfield Development Authority - Civil Aviation Safety Authority - Department of Infrastructure, Transport, Regional Development, Communications and the Arts - NSW Department of Primary Industries and Regional Development - NSW EPA - Fire and Rescue NSW - NSW Rural Fire Service - Transport for NSW - Western Sydney International Airport - Sydney Water - Endeavour Energy The comments from these organisations were incorporated into the SEARs and have been addressed in this EIS.
Test of Adequacy submitted to DPHI	May 2026	The EIS pack was submitted to DPHI by Urbis for preliminary feedback. DPHI provided feedback and the EIS pack was updated to address this.

The rationale for the project, including need and site selection is outlined in Table 6.

Table 6 Project Rationale

Project Detail	Commentary
Project need	The Sydney ADC project will harness leading edge technology to drive supply chain efficiencies but also stands to be a landmark investment in Western Sydney and specifically the Aerotropolis.
Site selection	During 2026, Western Sydney International Airport is planned to open. Catalytic infrastructure including the N-S Metro and the M12 motorway will be operating to support the efficient functioning of the Airport. Developments such as that proposed at the site will undoubtedly leverage off this significant infrastructure investment and showcase exactly what long terms plans for the Aerotropolis are intended to achieve.

Project Detail	Commentary
Strategies to avoid, minimise or offset impacts	The proposed ADC will be assessed with specific consideration to the assessment benchmarks established under the IPG Master Plan. Where strategies to avoid, minimise or offset impacts remain relevant to the ADC, these will be utilised. In the unlikely event that project specific strategies are required, these will be presented and justified as part of the specialist assessments to be provided with the future EIS.
Development required for the project but would be subject to a separate assessment.	Power, sewer, potable water, telecommunications, stormwater infrastructure will be required by the project. Approval for the Master Plan site-wide utilities will be secured by IPG via a CDC. As part of the ADC project, consent will be sought to finalise tap-in applications/connections as required. The ADC will gain all vehicular access from Road 3. The assessment of this is being undertaken by IPG through the complying development process. A DA (DA424/2024) was approved Liverpool Council for the construction of a roundabout on Badgerys Creek Road which will provide the lead-in to Road 3.

1.3.3 Related Development

Historic Land Use

The site was formerly used for intensive poultry farming operated by current landowner Ingham Property Group. The site featured several poultry sheds and ancillary structures, which are now demolished. There is also an internal road network within the site which had previously connected the sheds and ancillary structures dispersed across the site.

The proposal does not rely on any historic development consent or existing us rights and seeks consent for a new warehouse and distribution centre under the provisions of the WCP SEPP.

IPG Master Plan

The IPG Master Plan was finalised in July 2025. It supports a broader precinct of enterprise and light industrial uses, the Western Sydney International Airport and accommodate a range of complimentary land uses as envisaged by the WPC SEPP.

The IPG Master Plan site is bound by a large landholding to the north owned by CSR, and a similarly large landholding to the south referred to as the Greenfields Development Co (**GDC**) site. The GDC land is currently the subject of a Master Plan in accordance with the provisions of section 4.41 of the WPC SEPP. The development of the IPG Master Plan has had specific regard to the cumulative impact of these nearby sites and associated developments. Cumulative Impacts in relation to this SSDA are outlined in **Section 6** of this EIS.

Complying Development Works

Complying Development works are currently being undertaken on site to facilitate initial subdivision, and construction works for the delivery of Stages 1 and 2 of the IPG Masterplan. The proposed works consist of:

CDC – Overall Works

Subdivision of Stages 1 and 2 for the creation of development lots and local roads, including:

- Stage 1 (Lot 101) will be subdivided into three (3) lots and roads, consisting of the following:
 - Lot 111
 - Lot 112
 - Lot 113
 - Road 03 and Road 02

- Stage 2 (Lot 102) will be subdivided into seven (7) lots, consisting of the following:
 - Lot 208
 - Lot 209
 - Lot 210
 - Lot 211
 - Lot 212
 - Lot 213
 - Lot 214

Note: Lot 208, 209 and 210 comprise the subject site for the proposed SSDA.

CDC 4 – Stage 1 Works

Stage 1 works under this CDC include:

- Subdivision of Lot 101 into 4 lots, as above.
- Stormwater infrastructure in the form of online detention basins as well as Interim Wastewater Infrastructure, to serve future development in Stages 1 and 2.

CDC 4 – Stage 2 Works

Stage 2 works under this CDC include:

- Subdivision of Lot 102 into 8 lots, as above.
- Delivery and construction of Road 02, and bulk earthworks consisting of cut and fill works of the site, benching to facilitate the delivery of the second stage of the IPG Master Plan by delivering a development pad across the Stage 2.
- Delivery and construction of Road 03 which provides access to development lots within Stages 1 and 2 of the IPG Master Plan. Road 03 is a 'collector road' as identified under the Master Plan and will be acquired by Liverpool City Council.
- Stormwater infrastructure in the form of regional stormwater detention basins as well as Interim Wastewater Infrastructure, to serve future development in Stages 1 and 2.
- Public domain and landscaping works along Road 02 including site access up to the property boundary and the central and western riparian corridors.
- Public domain and landscaping works along Road 03 including site access up to the property boundary.
- Partial construction of Road 02 and the delivery of a temporary vehicle turning area to provide access to the Interim Wastewater Infrastructure

The proposed civil infrastructure provides future access into the development lots of Stages 1 and 2 and will provide direct access to Badgerys Creek Road into the IPG site. The connection into Badgerys Road Creek will be through a proposed roundabout which is the subject of a separate Local Development Application (DA) with Liverpool Council. The proposed civil infrastructure works for Stage 2 establishes the development pad for future building works in Stage 2 which can be provided through the haul road being delivered as part of a separate CDC application.

Further Works to be undertaken under CDC pathway

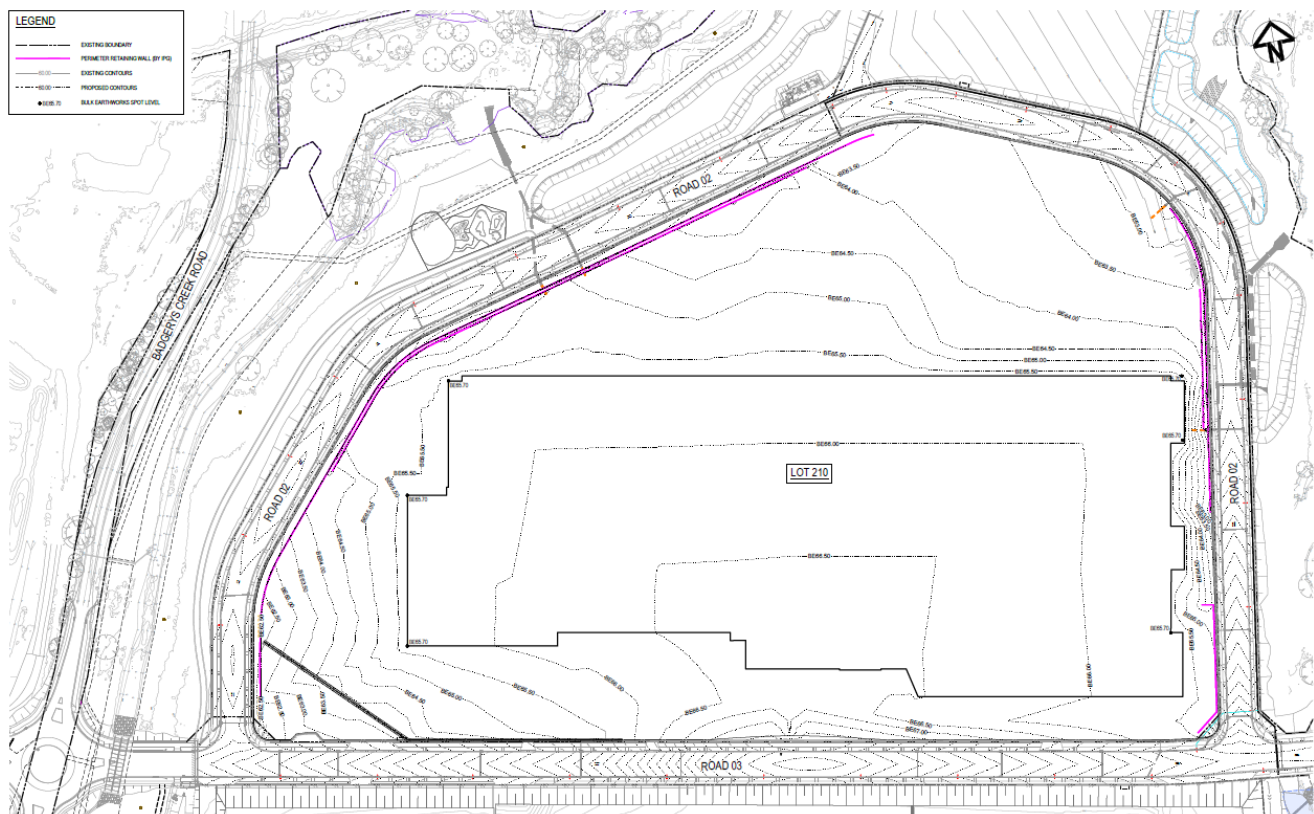
Under commercial arrangements with IPG additional works are expected to be progressed beyond the CDC but prior to commencement of the SSDA scope of works. These include:

- Addition of Retaining Walls (approx. 790LM) to north-east and north-west along Road 02
- Adjusted benching to tie into these retaining walls

- Addition of a 100mm sacrificial surface layer to the site
- Earthworks specification upgrade
- Temporary erosion and sediment control measures to manage exposed earthworks areas including surface protection using Polymer or Hydro-Mulch
- Establishment of perimeter batter transitions to tie the site pad into surrounding road and boundary levels
- Temporary drainage arrangements to manage runoff during the interim period prior to construction of the proposed development
- Provision and operation of temporary sediment basins as part of the IPG Stage 2 enabling works
- Stabilisation of completed earthworks areas prior to handover for future development works
- Interface works with the surrounding precinct drainage corridors and stormwater infrastructure
- Coordination of external civil levels to support future on-lot drainage connections for the proposed development.

Once these works are completed, this represents the site conditions at handover as seen in Figure 6.

Figure 6 Site Conditions at handover from IPG (post completion of CDC works)



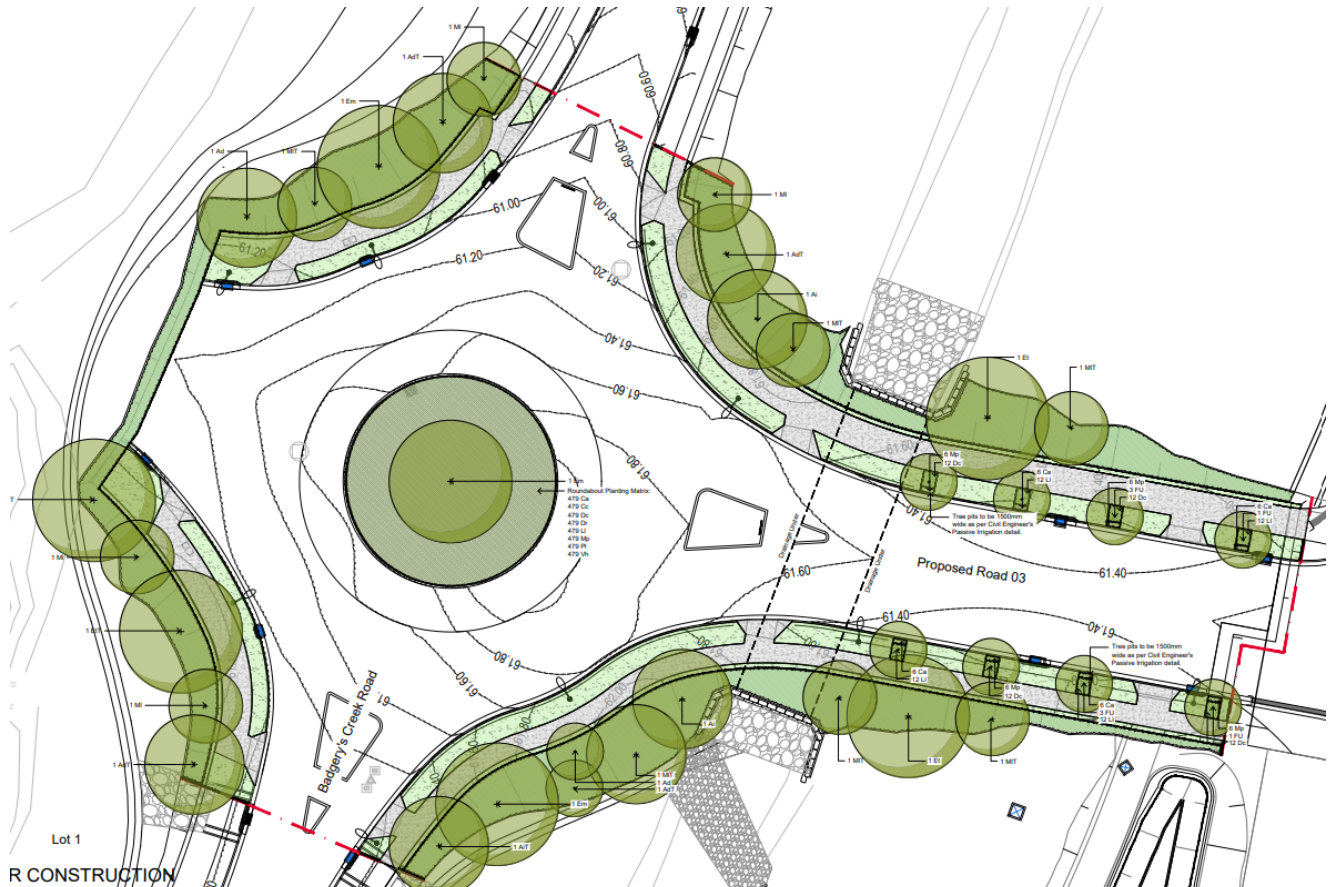
Source: AT&L, 2026

Road Construction

Development Application (DA) DA-424/2024 was submitted by the Trustee for Ingham Property Unit Trust 4 to Liverpool City Council. The DA was approved in March 2026 and it approved construction of a new roundabout on Badgerys Creek Road which will provide the lead-in to Road 3, the proposed road which provides access to the IPG Master Plan site. The approved works are described as follows:

Demolition of the existing road pavement to allow for the construction of a roundabout and associated engineering infrastructure, landscaping, pedestrian footpaths and subdivision of land.

The scope of the DA is limited to the intersection of Badgerys Creek Road and proposed Road 3. It does not include full road construction within the IPG Master Plan site and works do not extend within the immediate vicinity of the proposed ADC. Land subdivision, road works and servicing required to facilitate the proposed ALDI lot are to be undertaken under via the issue of Complying Development Certificates. Land subdivision, and road works and associated infrastructure which are specifically required to service the ADC site will occur prior to construction of the ADC.



1.4 Project Team

Table 7 Project Team

Consultant Report	Prepared By	Appendix	Date/revision
SEARs Requirements	Urbis	Appendix A	13 May 2026 Revision 1
Statutory Compliance Table	Urbis	Appendix B	13 May 2026 Revision 1
IPG Master Plan Compliance Table	Urbis	Appendix C	13 May 2026 Revision 1
DCP Compliance Table	Urbis	Appendix D	13 May 2026 Revision 1

Consultant Report	Prepared By	Appendix	Date/revision
Recognise Country Guidelines Template	Urbis	Appendix E	13 May 2026 Revision 1
Mitigation Measures Table	Urbis	Appendix F	13 May 2026 Revision 1
Estimated Development Cost Report	RLB	Appendix G	19 June 2026 Revision 03
Architectural Drawings	SBA	Appendix H	Revision 1 11.06.2026
Design Report	SBA	Appendix I	Revision 0 June 2026
Design Independent Peer Review	Watson Young	Appendix J	11 May 2026 Revision 2
BCA and Access Report	BM+G	Appendix K	Rev 3
Visual Impact Assessment	Urbis	Appendix L	May 2026
Transport Impact Assessment	Ason	Appendix M	V1, 8 May 2026
Landscape Plan	Site Image	Appendix N	Rev B
Landscape Design Report	Site Image	Appendix O	May 2026
ESD Report	Northrop	Appendix P	Rev 3
Embodied Emissions Materials Form	RLB	Appendix Q	Revision 1 13 May 2026
Biodiversity Certification Report	EcoLogical Australia	Appendix R	V3
Air Quality Impact Assessment	Northstar	Appendix S	12 June 2026
Noise and Vibration Impact Assessment	EMM	Appendix T	June 2026 Revision 3
Survey Plan	AT&L	Appendix U	27 March 2026 Revision P3
Civil Plans	AT&L	Appendix V	29 May 2026 Revision G
Flood Impact Risk Assessment	AT&L	Appendix W	11 May 2026 Revision 3
Soil and Water Management Plan	AT&L	Appendix X	12 May 2026 Revision C
Civil Infrastructure Report	AT&L	Appendix Y	12 May 2026

Consultant Report	Prepared By	Appendix	Date/revision
			Revision C
Integrated Water Management Strategy	AT&L	Appendix Z	15 June 2026 Revision 4
Hazmat Survey	Geosyntec Consultants	Appendix AA	Rev 1
Targeted Site Investigation	Geosyntec Consultants	Appendix BB	Rev 1
Remediation Action Plan	Geosyntec Consultants	Appendix CC	Rev 1
Preliminary Hazard Analysis	Acor	Appendix DD	Rev C 18 June 2026
Waste Management Plan	Urbis	Appendix EE	May 2026
Aboriginal Cultural Heritage Assessment Addendum Report	EcoLogical Australia	Appendix FF	10.4.2026
Historical Heritage Assessment Addendum	EcoLogical Australia	Appendix GG	10.4.2026
Social Impact Assessment	Urbis	Appendix HH	May 2026
Engagement Report	Urbis	Appendix II	April 2026
Bushfire Assessment Report	Blackash	Appendix JJ	Rev 1.0, 11 May 2026
Aviation Impact Assessment	AviPro	Appendix KK	Rev 1.3
Land Use Conflict Risk Assessment	Edge Land Planning	Appendix LL	April 2026
Geotechnical Investigation Report	WSP	Appendix MM	10 June 2026 Revision B
Erosion Sediment Control Plan	AT&L	Appendix NN	12 May 2026 Revision F
Fire Safety Engineering Statement	Innova Services	Appendix OO	17 April 2026 Revision 1
Resilience and Hazards Screening Assessment	Acor	Appendix PP	18 June 2026 Revision C

2 Strategic Context

This section of the EIS describes the key features of the site and its relationship to its local context. It also discusses how the project aligns with relevant strategic planning policy. It identifies other projects that should be considered in assessing the cumulative impacts of the project and also outlines the potential feasible alternatives explored by the applicant.

2.1 Key Features of Site and Locality

The location of the site is illustrated in Figure 1. The key features of the site are described in Table 8.

Table 8 Site and Locality Description

Descriptor	Site Detail
Land Configuration	The site has a high point ridge at the south-eastern portion resulting in the majority of the site sloping down towards the west, north and north-east.
Adjacent land uses	475 Badgerys Creek Road (the IPG Master Plan site) is situated between the Western Sydney International Airport (to the northwest), and the future Bradfield City Centre (to the south). The site is bound by a large landholding to the north owned by Goodman, and a similarly large landholding to the south referred to as the GDC Site. The proposed site is situated within the Western Parcel of the IPG Master Plan land. It will be bound to the south by Road 3 and Road 2 to the north.
Site Access	The proposed site footprint is reliant on the road network proposed by the IPG Master Plan. No roads are currently constructed on the site. The current Master Planning layout for the site proposes that the site will be accessed from proposed 'Road 3'.
Vegetation	The site consists of bare soil and overgrown vegetation which is reflective of its historic use for agricultural purposes.
Hydrology	The parcel of land nominated for the site is not impacted by overland flow / flooding. Stormwater falling onto the site will be required to be appropriately treated before draining into adjacent stormwater infrastructure.
Aboriginal Heritage	The site is identified as having potential areas of Aboriginal cultural sensitivity (moderate) across the periphery as identified by the Western Sydney Aerotropolis Precinct Plan mapping.
European Heritage	The site does not contain any heritage items and is not located in a heritage conservation area.
Bushfire	The broader IPG Master Plan site is currently mapped as being bushfire prone land, however the Master Plan has been designed to consider the suitability of the layout with respect to bushfire risk. This has considered the Aim and Objectives of PBP, Section 2.3 Strategic Planning, and specifically addressed the requirements of Chapter 4 – Strategic Planning and Chapter 8 – Other Development. Overall, the Master Plan provides a well-considered design that has responded to the bushfire risk affecting the site and provides for the protection of life and the minimisation of impact on property, whilst having due regard to development potential, site characteristics and protection of the environment.

Descriptor	Site Detail
	All proposed lots within the Master Plan are capable of meeting a minimum standard of BAL-29 construction for the indicated building envelopes on each proposed Lot, and the most suitable approach to facilitate the use of Exempt & Complying Codes should this be pursued for on-lot developments.
Biodiversity	The site is bio-certified under the Southwest Growth Centre Bio certification scheme.
Contamination	Forming part of the IPG Master Plan, a Detailed Site Investigation (DSI) was prepared to investigate the presence of soil and contamination. A Targeted Site Investigation (TSI) was undertaken as part of the proposed SSDA. It concluded that the site is suitable for the proposed development, subject to the preparation and implementation of a Remediation Action Plan (RAP). It is understood that site remediation works will be completed as part of preparatory works for the site by IPG.
Services and Utilities	The site is currently un-serviced, however is within the vicinity of existing water, electrical and telecommunication services. Utilities infrastructure required to service the proposed development and the remainder of the IPG Master Plan will be delivered separately by IPG. Approval for the Master Plan site-wide utilities will be secured by IPG via CDC. Utilities delivered in the initial stage (Stage 1) of the Master Plan will be extended to service the proposed development. This includes a Zone Substation in the southern part of the Master Plan. Only minor on-lot utilities connection works are therefore required as part of the development proposed by the Applicant as described within this EIS and subject to the future SSDA. As part of the ADC development, consent will be sought to finalise tap-in applications/connections as required.

2.2 Cumulative Impacts with Other Development in the Area

The site is located within Bradfield. Approved and likely future major projects which may be relevant in the cumulative impact assessment of the proposal are summarised in Table 9. This is in accordance with the SSDA cumulative impact guidelines where there

Table 9 Nearby Projects / Development

Development	Description	Status
Development to be considered		
DHL Logistics Facility, Badgerys Creek (North) SSD-70817958	Construction of two single storey warehouse buildings, landscaping works, associated vehicle crossings and drainage connection to the road drainage system, signage and wayfinding.	Response to submissions
Building 2 Advanced Manufacturing Research Facility 215 Badgerys Creek Road, Bradfield	Construction, fit out and use of AMRF. The AMRF will provide services, specialist equipment and workspaces for small to medium enterprises, start-ups and large multinationals.	Approved 07/04/2025 MOD-1: prepare report

Development	Description	Status
SSD-58591961		
Altis Warehousing Estate, 2289-2309, 2311 Elizabeth Drive, Luddenham SSD-48438209	Construction and operation of a warehouse and distribution estate.	Approved 15/04/2025
Elizabeth Enterprise Precinct - Stage 1 1669-1723 Elizabeth Drive, Badgerys Creek SSD-19618251	Concept Masterplan and Stage1 Development for general industry and warehouse distribution centres	Approved 4/02/2026
First Building Bradfield City Centre SSD-25452459	Construction and operation of an advanced manufacturing research facility, including workspaces, manufacturing hall, exhibition spaces, landscaping, parking and ancillary works.	Approved 09/09/2022 Mod-1: approved 14/04/2023 Mod-2: approved 05/07/2024
Elizabeth Drive Upgrades	The upgraded road will provide two lanes in each direction together with a median island, landscaping and paths. The proposed upgrades relate to 11.4km of road.	REF determined in November 2024
50 Martin Road, Badgerys Creek DA-723/2022	Demolition of existing buildings, remediation of site, construction of gravel hardstand areas, temporary office, temporary use as depot.	Deemed Refusal 27/02/2023. 24/03/2025 Appeal Upheld - s34 Agreement by Land and Environment Court
Western Sydney Airport Business Park The Northern Road, Luddenham SSD-64409468	Construction and operation of the Western Sydney Airport Business Park comprising earthworks, retaining walls, estate wide infrastructure, development of nine buildings for agribusiness uses, landscaping and riparian corridor works.	Under assessment
40 The Retreat, Bringelly SSD-65729209	Construction and operation of mixed-use residential development within the Western Sydney Aerotropolis	Response to submissions
Luddenham Resource Recovery Facility 275 Adams Road, Luddenham	Construction of a Resource Recovery Facility accepting up to 600,000 tonnes per annum of construction and demolition waste and commercial and industrial waste.	Approved 13/08/2024

Development	Description	Status
SSD-10446		
Central Park, Bradfield City Centre	Construction of the Bradfield City Centre Central Park including associated structures and landscaping works.	Approved 06/03/2025
SSD-65490715		MOD-1: approved 02/05/2025
WSI Airport 2014-7391	Staged proposal comprising the construction and operation of a new international airport.	Under construction, proposed to be operational by December 2026.
M12 Motorway SSI-9364	A new dual-carriageway motorway to connect the M7 Motorway with the Western Sydney Airport and The Northern Road. The motorway will be initially two lanes in each direction, with capacity for an additional future lane in each direction.	Approved 23 April 2021. Currently slated for early-mid 2026 open.
Western Sydney Freight Line	Proposed dedicated freight rail line connection between the Western Parkland City and Port Botany. The new freight rail line will free up the Main West Rail Line to allow more passenger services over time.	Stage 1 Corridor – connecting from OSO to Horsley Park and M7 is now protected and acquiring properties.
Sydney Metro – Western Sydney Airport SSI-10051	A new metro line to service Western Sydney International Airport, the Western Sydney Aerotropolis and interchanging with the T1 Western Line at St Marys	Approved 23 July 2021. Construction is to commence in December 2022 and to be completed in late 2026 to coincide with the WSA. Mod-2: approved 20/12/2024
Western Sydney International Airport	New international and domestic airport, anticipated to accommodate up to 10 million passengers per year. Located approximately 2km northwest of the subject site.	Under construction, anticipated second half of 2026.
Bradfield City Centre	New major city planned at the heart of the Aerotropolis. Located approximately 2.5km south of the subject site.	First building constructed. New SSDs included below in <i>New Development</i> section.
Aerotropolis Metro Station	New major transport infrastructure, connecting Bradfield and the Western Sydney Airport to greater Sydney.	Under construction. Anticipated to open 2026.

Development	Description	Status
Base Farm Greendale Masterplan	Masterplan that provides framework for future development including super lot subdivision, public roads, stormwater infrastructure and public open space, delivering: - Over 10,000 jobs within proximity to Western Sydney International Airport, Bradfield City Centre, and public transport services. - Up to 1.4 million square metres of gross floor area, including: - large-scale warehouses and industrial buildings - a small-scale local centre, for retail, commercial, community, and recreation uses, creating a vibrant hub for business and lifestyle - more than 115 hectares of open space, with riparian corridors, pedestrian pathways and cycleways along Lake Duncan.	Under assessment
Burrah Park 1953–2109 Elizabeth Drive SSD-70316465	State Significant Concept Masterplan Burrah Park warehouse and logistics estate, comprising forty-two (42) building envelopes. Located approximately 3.5km north of the subject site.	Under assessment
Badgerys Creek Industrial Park 85 Martin Road SSD-74191717	Construction of a warehouse and distribution facility consisting of three warehouse buildings with ancillary offices and associated services, infrastructure, on-site parking and landscaping	Response to Submissions
ALDI Automated Distribution Centre, 475 Badgerys Creek Road SSD-76913969	Construction and operation of an automated warehouse and distribution centre.	Approved 26/02/2026
225–245 Martin Road, Bradfield Bulk Earthworks SSD-97711727	Bulk earth works to facilitate future warehouse development.	Collate submissions
Building 2 Advanced Manufacturing Research Facility, 215 Badgerys Creek Road, Bradfield SSD-58591961	Construction and operation of an advanced manufacturing research facility within the Bradfield City Centre with associated car parking and landscaping.	Approved 07/04/2025
Central Park, Bradfield City Centre SSD-65490715	Construction of the Bradfield City Centre Central Park including associated structures and landscaping works.	Approved 06/03/2025

Development	Description	Status
MU Resi & Commercial, 135 Badgerys Creek Road, Bradfield SSD-77458970	Concept application including a mixed-use residential and commercial development located on land at 135 Badgerys Creek Road, Bradfield	Response to submissions
Emerging Development Proposals		
Project Maverick – Internal Works, 225-245 Martin Road, Bradfield SSD-97688711	Construction, fit-out and operation of 14 warehouses, active open space and amenities precinct, and internal estate infrastructure works.	Prepare EIS
320 Badgerys Creek Road – Warehouse Estate, SSD-113721746	Concept proposal for an industrial estate with a Stage 1 development including site preparation and bulk earthworks, lot subdivision, roads, stormwater infrastructure, construction and operation of one warehouse building, carparking and landscaping.	Prepare SEARs
Fashion Biz Warehouse and Distribution Centre, 1-3 Shannon Road, Bradfield SSD-72398961	Construction of Fashion Biz Warehouse and Distribution Centre	Prepare EIS
60 Kelvin Park Drive, Bradfield SSD-74765211	The proposal includes the subdivision of two lots and construction of eight residential buildings incorporating ground floor retail and commercial uses.	Prepare EIS
Steel processing Facility, 155 Mersey Road, Bradfield SSD-81301710	Construction and operation of a steel processing facility.	Prepare EIS
230 Martin Road Industrial Development SSD-65529236	Construction and operation of two large format warehouses	Prepare EIS
320 Badgerys Creek Road – Warehouse Estate, SSD-113721746	Concept proposal for an industrial estate with a Stage 1 development including site preparation and bulk earthworks, lot subdivision, roads, stormwater infrastructure, construction and operation of one warehouse building, carparking and landscaping.	Prepare EIS
1320 The Northern Rd, Bradfield SSD-101688710	Demolition of existing structures and construction of a mixed use residential building comprising of 230 apartments with ground floor retail, associated basement parking, landscaping and public domain works.	Prepare EIS

The potential cumulative impacts of the project are addressed in Section 6 of the EIS in accordance with the DPHI Assessing Cumulative Impacts guidelines.

2.3 Agreements with Other Parties

The parcel of land nominated for the ADC will be subdivided and serviced prior to the operation of the ADC by the current landowner, IPG. As the scope of this SSDA does not include off lot works or public infrastructure, there are no planning agreements relevant to the submission of the EIS.

2.4 Strategic Planning Alignment

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined in Table 10.

Table 10 Strategic Planning Consistency

Plan	Comment
Greater Sydney Region Plan – A Metropolis of Three Cities	The Greater Sydney Region Plan (Regional Plan) is the overarching strategic plan that seeks to shape future development for the Sydney metropolitan area over the next 40 years. Under the Region Plan, the site is located within the Western Parkland District, which forms as part of the Western Parkland City. The site is located within the Aerotropolis Core Precinct directly adjacent to the Western Sydney International Airport (WSI) and Bradfield City which is identified to become the CBD of the Western Parkland City. The corridor will contribute to a strong trade, freight and logistic, advanced manufacturing, health, education and science economy. The project will act as a catalyst for the Aerotropolis Core, delivering a significant economic investment as intended for the area under the Regional Plan
Draft Sydney Plan	The Draft Sydney Plan is a 20-year plan for how the NSW Government aims to address growth across the Sydney Metropolitan Region. The site is located in the Western Sydney Aerotropolis and adjacent to Bradfield. The Draft Sydney Plan identifies the site as being employment land will help to accommodate the projected 20,000 jobs in the Aerotropolis.
Western City District Plan	The Western City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The site forms part of the Western Economic Corridor which GSRP identifies will attract globally significant freight and logistics uses, in a highly strategic location. The project will deliver this vision, enabling a large-scale warehouse or distribution facility in a strategic location.
Western Sydney Aerotropolis Plan	The Western Sydney Aerotropolis Plan ('the WSA Plan') outlines the planning framework for the Aerotropolis. It sets a clear vision to guide its future development, with objectives underpinning the realisation of the key priorities outlined within the Region and District Plans, i.e. Productivity, Sustainability, Infrastructure and Collaboration and Liveability. Key elements of the vision and the Structure Plan include a landscape-led approach to establishing the structural elements, including:

Plan	Comment
	▪ Implementing the 'Connecting with Country' framework to ensure Country is cared for during the design and development process. ▪ Creating a global gateway with fast and reliable transport and digital infrastructure to attract the best and brightest to invest and work in the Aerotropolis. ▪ Designing a cool, green new city with great places that are connected by walking, cycling, interaction and collaboration, with blue and green infrastructure to maintain biodiversity and deliver high amenity spaces. ▪ Evolving land uses and urban forms to allow for transition to more intensive and higher-order technology, advanced manufacturing and creative industry uses over the longer term. ▪ Retaining a green, biodiverse landscape with regeneration of natural landscapes to reduce impacts as the Aerotropolis develops over time. The principles outlined above have been embedded in the IPG Master Plan, and will therefore form important elements of the proposal ADC given it is being designed to comply with the Master Plan
Liverpool Local Strategic Planning Statement	The Liverpool Local Strategic Planning Statement (LSPS) is a 20-year plan and land use vision that seeks to appropriately develop jobs, homes, and infrastructure in conjunction with the identified priorities of the Liverpool community. Planning Priority 12 under the LSPS, seeks to deliver industrial and employment lands to meet Liverpool's future needs, delivering more jobs and economic stimulation to Western Sydney.
Liverpool Draft Industrial and Employment Lands Strategy	The Draft Liverpool Industrial and Employment Lands Strategy is a comprehensive plan aimed at guiding the development and management of industrial and employment lands within the Liverpool local government area. The strategy focuses on optimizing land use to support economic growth, job creation, and sustainable development. The Strategy has significant emphasis on the Aerotropolis, specifically for its strategic location as a key node in both national and international supply chains. The proposed ADC will leverage this opportunity, playing an integral role in distribution of goods for potential tenants State-wide, and contribute to the economic diversification of the Liverpool region.
Future Transport Strategy	The NSW Future Transport Strategy is a long-term plan for transforming the transportation landscape in New South Wales. It aims to create a modern, efficient, and customer-focused transport system that can adapt to emerging technologies and cater to the evolving needs of a growing population. The project is consistent with the Future Transport Strategy in that the ADC will enhance connectivity and integration. Due to its strategic location near major transport hubs, the distribution centre would improve the efficiency and reliability of supply chains, facilitate seamless movement of goods and enhancing the overall integration of the transport network. It will also incorporate sustainability initiatives and advanced technologies (including automation) which supports the strategy's goals of reducing environmental impact and fostering a technologically advanced transport system.

Plan	Comment
	The site characteristics are well suited to the proposed development and there are no environmental constraints which would pose an unacceptable risk to the operation. The proposed ADC in this location will enhance the resilience of supply chains and ensuring equitable access to goods and services
Infrastructure Opportunities Plan – Greater Sydney	The Infrastructure Opportunities Plan provides a list of State and regional infrastructure projects eligible to be delivered as Works-In-Kind projects under the Housing and Productivity Contribution. The infrastructure that will support the proposed development include upgrades to Mamre Road and drinking water upgrades around the Aerotropolis.
Aerotropolis Sector Plan	The Aerotropolis Sector Plan, released by INSW in February 2025, outlines and prioritises key enabling infrastructure to support development within the Western Sydney Aerotropolis. The Plan coordinates planning, development and infrastructure to provide greater certainty on delivery timeframes for key enabling infrastructure, which are critical to unlocking employment land and realising the Aerotropolis vision. The site is situated within the Aerotropolis Core, which the Plan identifies as being partially serviced by 2027. The development of Badgerys Creek Road and Eastern Ring Road will assist with the operation of the proposed development.
Draft Statewide Policy for Industrial Lands	The Draft Statewide Policy for Industrial Lands supports the Draft Sydney Plan. It provides the overarching framework for categorising industrial land and the statewide approach to industrial land use planning in NSW. The proposed development will provide industrial uses on a site identified as Regionally Significant land. The proposed development will provide 3,123 construction jobs and 807 operational jobs to support the regional and State economy.
Better Placed	Better Placed is an integrated design policy for the built environment developed by the NSW Government Architect. The policy aims to enhance the quality of life for the people of New South Wales by promoting good design in the planning, design, and construction of buildings, spaces, landscapes, and neighbourhoods. Better Placed has informed the IPG Master Plan and its proposed Design Quality Strategy. The ADC has been designed having regard to the DQS, inclusive of both the verification process and design panel review, as detailed in the Architectural Design Report at Appendix I.
Connecting to Country Framework	The NSW Government Architect's "Connecting to Country" framework aims to integrate Aboriginal cultural knowledge into the planning, design, and development of the built environment. It seeks to foster a deep respect and understanding of the Aboriginal connection to Country, promoting its recognition and celebration in contemporary design and planning. The framework serves as a guide to create spaces that are culturally inclusive, sustainable, and reflective of Australia's rich Aboriginal heritage. Connecting with Country and Design Quality has informed the IPG Master Plan. The Connecting with Country Framework and engagement process undertaken by Yerrabingin submitted with the Master Plan, informs the

Plan	Comment
	principles and criteria within the DQS, which has then been the key design document to inform the ADC. The ADC adopts key design elements and principles informed by the Connecting to Country Framework. Key design themes include: ▪ Water Landscape ▪ The Convergence of 3 Clans ▪ Community Driven ▪ Language, Naming and Wayfinding Specific design responses are outlined in further detail within the Architectural Design Report at Appendix I.

2.5 Justification Summary

The project is considered to be aligned with the overall strategic context for these reasons:

- Infrastructure and utility works associated with the broader IPG estate, will be the responsibility of IPG. The impacts of these works have been assessed by DPHI and are considered appropriate to be undertaken via the CDC pathway, noting this pathway is not required to further consider impacts, rather ensure the outcomes comply with a prescribed set of requirements. The broader development contemplated by the Master Plan (including the public works) forms part of the NSW Government's Western Sydney Aerotropolis project. We consider it clear that it is legally permissible for DPHI to approve significant development such as the proposed development on and around the Site as part of broader infrastructure initiatives and the development of the Badgerys Creek area.
- The proposed development has considered the broader locality, including surrounding infrastructure, public transport, and the cumulative impacts of other projects, in line with DPHI's *Cumulative Impact Assessment Guidelines for State Significant Projects*. The project will not result in any substantive cumulative traffic and noise impacts, having considered the capacity of existing roads, potential traffic increases, and noise mitigation measures. Additionally, the project will benefit from a precinct wide consideration of larger topographic constraints, such as hydrological management and ecological impacts
- The project aligns with relevant State and local strategic planning policies, as it will contribute additional floorspace and industrial typologies to support the growth of the freight and logistics network. The site's proximity to the Western Sydney Airport, a crucial component of Sydney's freight and logistics networks, is a significant advantage.

3 Project Description

The following section of the EIS summarises the key numeric components of the proposed development and describes the demolition, site preparation, construction and operational phases in further detail.

3.1 Project Overview

The key components of the proposed development are summarised in Section 6. A copy of the architectural drawings is provided as Appendix H.

Table 11 Project Summary

Project Element	Summary
Project Summary	This SSDA seeks consent for the construction and operation of a warehouse and distribution centre at a proposed future lot within 475 Badgerys Creek Road, Bradfield (part Lot 102 and Lot 105 in DP 1316278).
Site/Project Area	The development site is located within 475 Badgerys Creek Road, Bradfield. Proposed site area: 171,682m ²
Proposed uses	Development consent is sought for a Warehouse or Distribution Centre (<i>i.e. a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made</i>). Ancillary office space is also proposed as part of the development.
Demolition	N/A. There are no existing structures on site.
Earthworks/Cut and Fill	Detailed bulk earthworks, retaining walls and batters are proposed to establish the proposed building pads and this will be undertaken via the CDC pathway as discussed in Section 1.3.3. Proposed earthworks and cut and fill are detailed in Section 3.2
Remediation	N/A. Remediation works have already been undertaken previously at the site.
Gross Floor Area (GFA)	195,829m ² which includes: ▪ 190,752m² warehouse ▪ 2,782m² print on demand facility ▪ 2,008m² dangerous goods ▪ 253m² ancillary office ▪ 34m² gatehouses
Floor Space Ratio (FSR)	1.14:1
Maximum height	25.02m (based on existing site levels) 24.72m (based on pad levels at site handover from IPG)
Building Setbacks	▪ North: 21.5m ▪ East: 15.5m ▪ South: 59.4m ▪ West: 50.5m

Project Element	Summary
Vehicular access	4 vehicle access points are proposed from Road 3, including: ▪ Truck entry and exit ▪ Car park entry and exit ▪ Car park entry and exit ▪ Car park entry and exit 2 vehicle access points are proposed from Road 2, including: ▪ Car park exit ▪ Truck exit
Parking	▪ 888 parking spaces, this includes: – 9 accessible spaces – 9 ute spaces – 222 electric vehicle spaces ▪ 32 motorbike spaces ▪ 120 trailer spaces
Loading provisions	▪ 56 loading docks (comprising 48 recessed docks and 8 at-grade roller shutter doors) ▪ 120 truck parking spaces
Bicycle parking	40
End of trip	Male and female showers and changerooms included within staff facilities
Deep soil area	27,057m ² (15.8% of site area)
Hours of construction and operation	Construction: ▪ 7am- 6pm Monday – Friday ▪ 8am – 1pm Saturday ▪ No works on Sundays or public holidays Operation: ▪ 24 hours per day, 7 days per week
Jobs	The construction of the project has a forecast employment contribution throughout the community of 3,123 jobs across the construction duration comprising: ▪ 2,155 directly employed on site ▪ 640 manufacture and supply of intermediate goods and services ▪ 329 indirect supply of goods and services Once operational, the proposed development is expected to generate 807 full-time jobs, including 724 warehouse roles and 83 office related roles. It is anticipated that a maximum of 686 staff would be on site at one time during operation.

3.2 Site Preparation Activities

3.2.1 Demolition/Tree Removal

There are no demolition or tree removal works proposed as part of this SSDA. The site will be fully cleared prior to commencement of construction. All demolition works have been completed as part of the IPG Masterplan works and tree removal is being undertaken as part of works permitted via complying development.

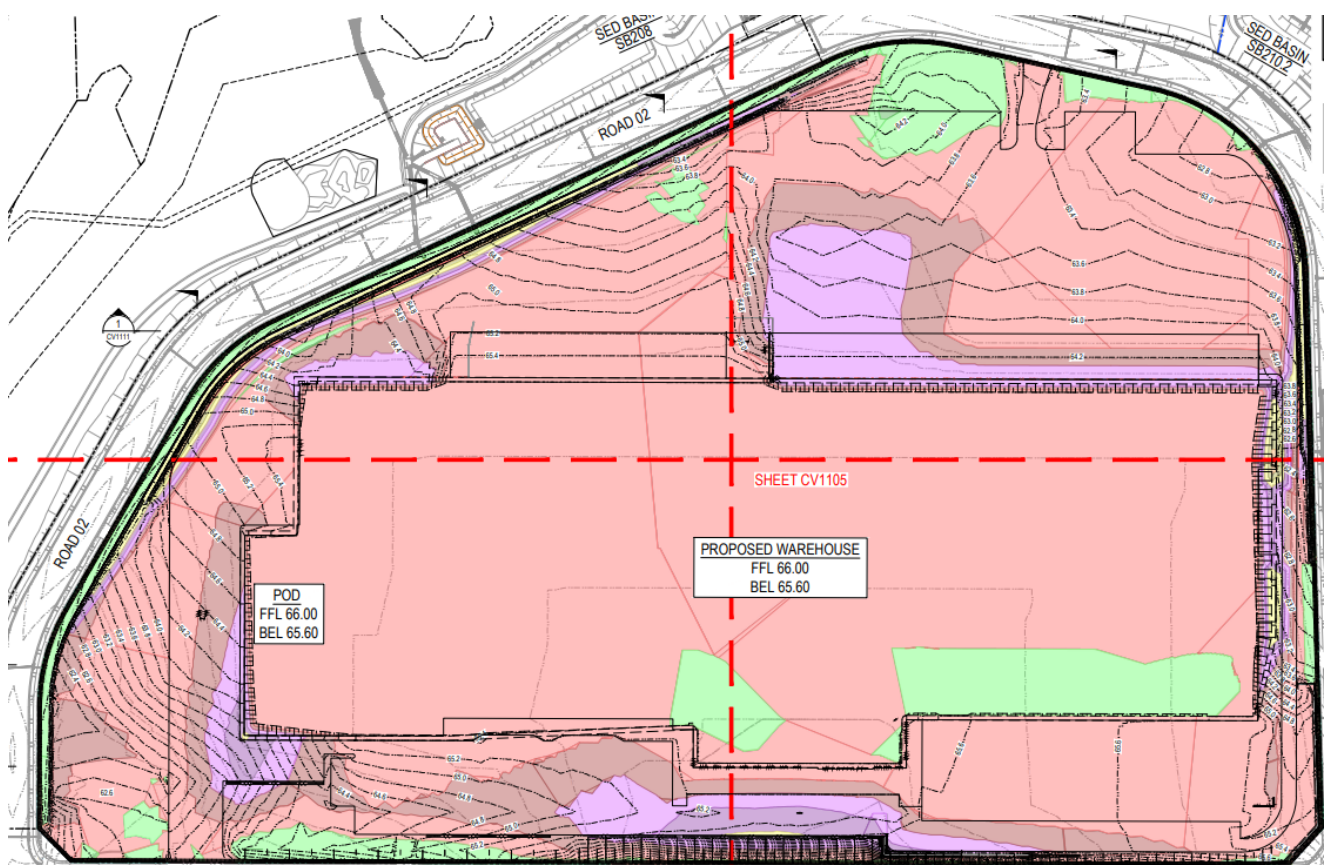
3.2.2 Site Preparation

Cut and Fill

The scope of works for which consent is sought under this EIS relate only to those works required once the site has been benched and established (which will be completed via the CDC pathway and is discussed in Section 1.3.3). That is project specific earthworks to facilitate the ADC building pad and hardstand area are included as part of this SSDA. Proposed cut and fill depths have been provided within the Civil Engineering Drawings at Appendix V and represented in Figure 7.

A high-level earthwork volume estimate assessment has been completed for the site, which includes upper and lower limits enabling a suitable impact assessment commensurate with the planning approvals stage of a project. A detailed assessment of the earthworks level will be completed during detailed design stage and some adjustment to the final pad and building floor levels (within $\pm 500\text{mm}$). The volume estimates are depicted in Figure 8.

Figure 8 Cut and Fill Plan



Source: AT&L, 2026

Figure 9 Earthworks Volume Estimate

EARTHWORKS VOLUMES

NET CUT VOLUME (m3) A	NET FILL VOLUME (m3) B	BALANCE VOLUME (m3) C = A + B	ITEM
-57,570	+1,240	-56,330 (EXPORT)	WS13 WORKS

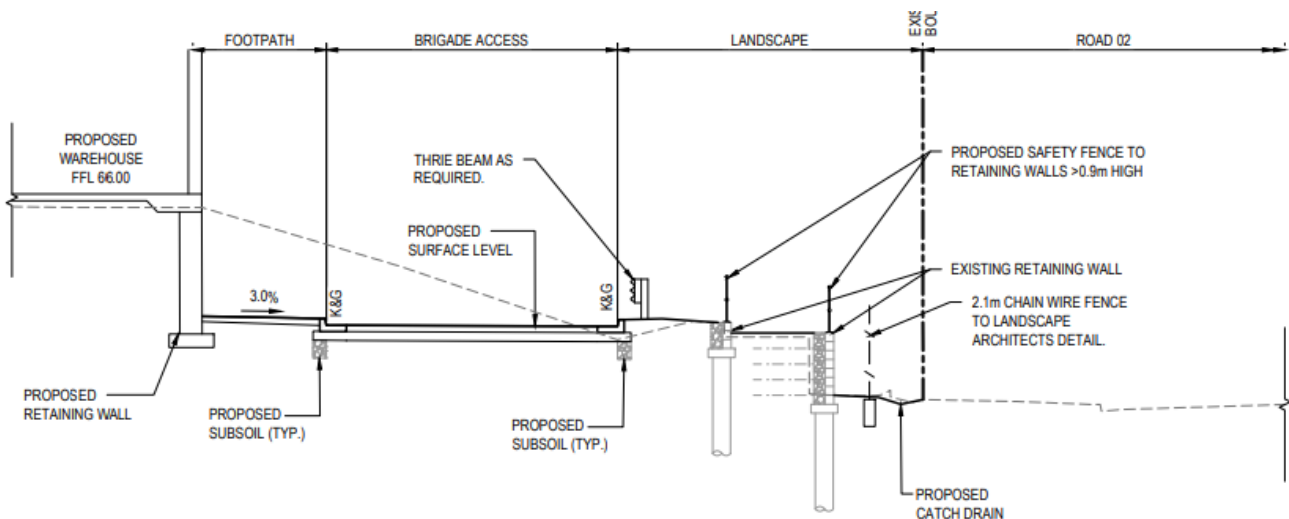
Source: AT&L, 2026

Batters and Retaining Wall

Where level changes are present across the site, a combination of landscaped batters and retaining walls will be utilised to maintain ground stability. Landscape batters and retaining walls are generally located around the perimeter of the site to manage the transition to adjacent land and roadways. The location and heights of proposed retaining walls are shown on Civil Engineering Drawings (see Appendix V).

Proposed permanent batters will be no steeper than 3 horizontals to 1 vertical to assist in maintaining embankment stability.

Figure 10 Retaining Wall Section



Source: AT&L, 2026

3.3 Land Use and Activities

3.3.1 Land Use

Consent is sought for a warehouse and distribution centre (as defined below), noting this land use definition includes ancillary office space.

warehouse or distribution centre means a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises.

The proposed warehouse and distribution centre will be used exclusively for stored and handling of items associated with the daily distribution of goods. Further, the facility will have capacity to service future expansion of their network, noting the site benefits from immediate proximity to the proposed Western Sydney Airport which will be receiving national and international freight.

The proposed hours of operation are 24 hours a day, 7 days a week. This is consistent with the vision for the site within the IPH Master Plan.

On-site activities associated with the ADC will include:

- Loading, unloading and handling of goods and materials for the purposes of storage and distribution.
- Heavy vehicle movements, container and truck parking and car parking.
- Arrival and departure of employees.
- Operation of a gatehouse at the inbound truck entry/outbound truck exit point

The ADC has a total GFA of 195,831m² which includes the following:

- 190,752m² warehouse
- 2,782m² print on demand facility
- 2,008m² dangerous goods
- 253m² ancillary office
- 34m² gatehouses

In total 724 people will be employed within the warehouse (split over 3 shifts) and a further 83 employees within the ancillary office spaces. It is anticipated that there will be a maximum of 686 employees on the site at one time.

3.3.2 Fit out

The ADC will support the automated distribution of goods associated with the retailer's business. The proposal includes the complete fitout of the internal space to include all necessary racking, automation, and associated ancillary features including offices and amenities.

The fitout components of the ADC include the following:

Warehouse and Operational Areas

- Large, open-plan warehouse floors over three levels, designed for automated goods storage and distribution.
- Vertical goods movement shafts (for lifts and conveyors) located in perimeter blocks.
- Dangerous goods storage area.
- Print room.

Staff and Driver Amenities

- Multiple breakrooms and indoor break areas with natural daylight, distributed around the perimeter of each warehouse level.
- Restroom amenities on every level, including toilets and handwashing facilities.
- Lockers and showers for end-of-trip amenities.
- Trucker lounges within perimeter blocks for driver rest and welfare.
- Kitchenettes associated with break areas.

Office and Ancillary Spaces

- Main entry lobby and reception area.
- Office spaces for administration and management.
- Meeting rooms.
- Ancillary office component with direct access from the main entry and car park.
- Wet areas (toilets, showers) for both warehouse and office staff.

Circulation and Access

- Vertical circulation cores (stairs and lifts) located in perimeter blocks, serving all warehouse levels.
- Clearly defined pedestrian pathways throughout the building and from the car park.
- Dedicated bicycle parking shelter with end-of-trip facilities.

Loading and Logistics Support

- Loading docks (both at-grade and recessed) with weather-protected awnings.
- Dock office for overseeing loading/unloading operations.
- Gatehouses for truck access control and security.
- Waste storage area.

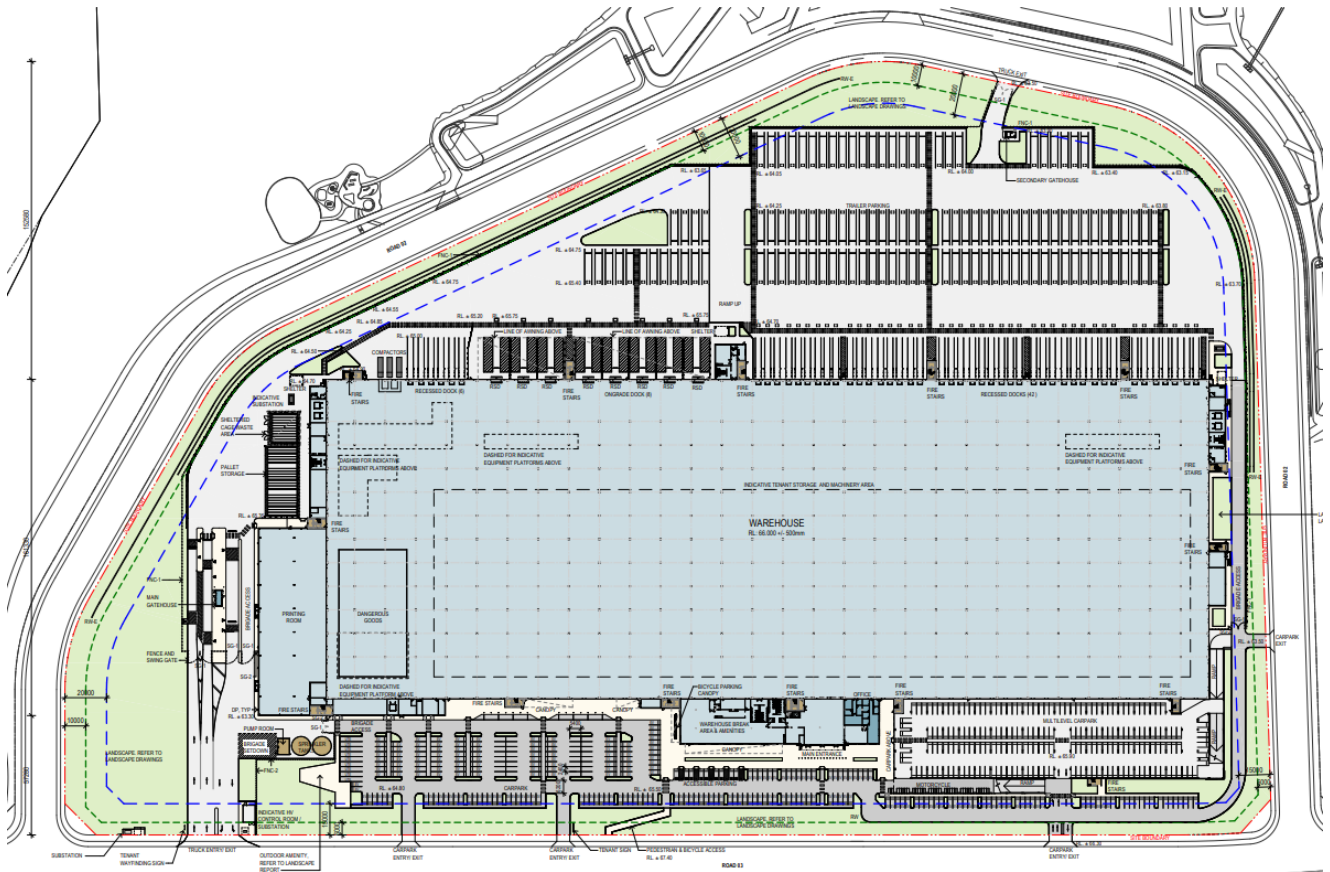
3.4 Layout and Building Design

3.4.1 Proposed Site Layout

The proposed layout of the site relies upon subdivision occurring in accordance with the proposed IPG Master Plan, and specifically, the draft Plan of Subdivision at Appendix PP. The proposed site area is 171,682m². The IPG subdivision will create a regular lot layout with a wide frontage, highly suitable for the proposed land use and site layout. The details of the proposed site layout include:

- Vehicle access from proposed Road 3 made up of 4 separate vehicle access to accommodate inbound and outbound truck access, along with separated passenger vehicle entry and exit. A truck egress and separated passenger vehicle egress is also proposed via Road 2.
- Centrally located 190,752m² warehouse
- Ancillary office space located to the south within the warehouse. It includes office areas, meeting rooms and staff facilities.
- A print-on demand facility
- Vehicle car park with 888 car spaces is located to the south of the warehouse, which includes a multi-deck car park.
- Gatehouse at the south-western entry/exit point, servicing both inbound entry and outbound exit trucks.
- Generous landscape setbacks for deep soil planting around the perimeter of the site, delivering 15% of the total site area as deep soil planting and landscaping as envisaged in the IPG Master Plan.

Figure 11 Site Plan



Source: SBA, 2026

3.4.2 Warehouse Design

Warehouse

The warehouse design is specifically tailored to support the highly automated distribution of goods. The internal layout design, as well as the proposed building heights has been driven by the types of goods being stored at the premises and the operation of the warehouse. The proposal includes the complete fitout of the internal space to include all racking, automation and associated ancillary facilities.

Perimeter Blocks

Supporting building services that support efficient operation of the warehouse facility are integrated along the perimeter of the warehouse development. These include vertical shafts for goods movement, staircases and lifts for occupant circulation, truck driver amenities, break areas and restroom facilities. The amenities areas have been strategically placed across every level to minimise walking distances and ensure convenient access.

Office

Ancillary office space is located at the centre of the southern end of the warehouse building. This provides space for office areas, meeting rooms and staff facilities. The main entrance to the office building is located adjacent to the vehicle car park and the multi-deck car park.

Outdoor Amenities

Indoor break areas featuring windows equipped with passive solar shading devices are provided on the perimeter of the warehouse development. These have been carefully designed to optimise solar orientation and reduce heat gain while maximising natural daylight.

The ground level office break area includes an outdoor shelter that provides shade and comfortable spaces for staff to relax. There are also dedicated shelters at the truck hardstand that offer protection from adverse weather conditions.

The proposed building design has considered the provisions of the National Construction Code (NCC) and the Building Code of Australia (**BCA**) to enable issue of construction approvals. Further assessment will be undertaken as the design develops to ensure compliance is achieved at the time of Construction Certificate issue.

Figure 12 Proposed warehouse



Source: SBA, 2026

Figure 13 Proposed warehouse



Source: SBA, 2026

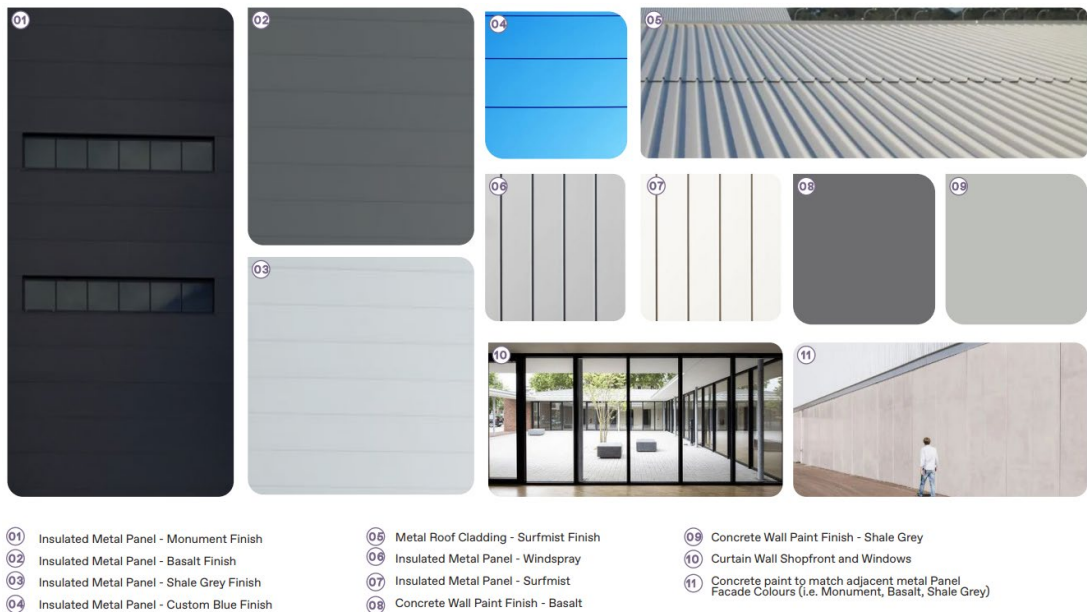
3.4.3 Materials and Finishes

The warehouse façade will be made up of several typical materials for such a development, including precast concrete panels and Colorbond metal cladding. Windows have been incorporated into the design to enable natural light and views to the surrounding locality.

The design incorporates light coloured roofing materials to minimise heat retention and enhance energy efficiency. The selection of colours has been carefully composed to create a cohesive architectural identity.

Images of the proposed façade design from key viewpoints are depicted Figure 12 and Figure 13. The proposed colour palette for the warehouse and office spaces is provided in Figure 12. Refer to Architectural Plans and Architectural Design Report for a detailed finishes schedule and high-resolution elevation.

Figure 14 Materials and Finishes Palette



Source: SBA, 2026

3.4.4 Connecting with Country

The project has been informed by an understanding of the system of Country and the importance of embedding cultural knowledge into the planning, design, and development of the site. A substantial body of work has been completed as part of the IPG Master Plan which has enabled a whole of master plan approach, inclusive of the ADC site.

The approach to designing with Country utilises the GANSW Connecting with Country Framework as well as the IPG Master Plan Designing with Country Framework. Specifically, the proposed design applies the community driven principles established in the Master Plan Designing with Country Framework. The key principles and how these elements have been interpreted and incorporated into the design are outlined in Table 12.

Table 12 Connecting with Country Principles and Design Response

Design Element	Design Quality Principle	Response
Water Landscape	- Development is to consider Aboriginal cultural elements such as waterways and landscape features, where relevant and appropriate. - The architectural design is to consider the form and colours of the waterways and landscape, where relevant and appropriate	Built forms are set back from Road 02, 03, and the riparian corridors, to allow for generous landscape buffers. These setbacks incorporate extensive perimeter vegetation and tree planting to reinforce the blue-green corridor network and celebrate the restored creek environments. Along Road 03, landscape features are integrated within the setback to highlight its role as a key creek-to-creek connection and strengthen its identity within the precinct.
Convergence of Three Clans	- Development is to acknowledge and represent Dharug, Dharawal and Gandangara groups by interpreting key narratives and stories on the site. - Development must incorporate communal spaces that allow for gathering and interaction. - Acknowledging the diversity of flora and fauna in the area and the role they play in sustaining life. The design of communal spaces is to acknowledge the diversity of flora and fauna, where relevant and appropriate.	Community spaces are provided not only within the facility, but also through a covered outdoor seating amenity located adjacent to the main entrance. An additional outdoor seating area is located within a dedicated landscaped space at the end of the car park, adjacent to Road 03 and within the designated Water Landscape, where it forms a prominent communal space within the development. Refer to the Landscape Report for further details.
Community Driven	- The Landscape and Public Domain Design is to be developed and codesigned through the Designing with Country process. - The key themes including The Convergence of 3 Clans, Water Landscape and Community Driven, should help to drive the spatial and conceptual design.	Community-driven principles are achieved through the provision of multiple outdoor break and communal amenities across the site. Outdoor amenity areas are designed with intentional landscape features to promote comfort, openness, and a strong connection to the natural environment. The multi-level car park sitting prominently at the street frontage incorporates an architecturally treated screen featuring a distinct design gesture,

Design Element	Design Quality Principle	Response
		where the screen gently curves down to touch the ground and rises again at the corner. This organic form references and draws inspiration from the existing terrain and surrounding Blue Mountains landscape, reinforcing a connection between the built form and its natural context.
Language, Naming and Wayfinding	- Acknowledge the Importance of Indigenous Language and Naming and facilitate the integration of Language across the site, with consideration to the theme of the three clans, where appropriate and suitable. - Landscape design and place making to incorporate and interpret the Aboriginal language, knowledge and art as design elements. - Public open space within the Master Plan is to consider opportunities for learning as a way of designing with Country (e.g., signage along riparian walking tracks, paving with codesigned motifs or engraving, etc.). - Enhance the cultural connection to place in development within the Master Plan by: - Incorporating local Aboriginal language to place names. - Incorporating the Aboriginal language, knowledge and art.	Landscape features are integrated to enhance the streetscape and highlight the creek-to-creek connection. The importance of cultural connection is acknowledged through the design, with wayfinding elements incorporating Aboriginal language, knowledge, and art to be developed at the detailed design stage.

3.4.5 Sustainability

The proposed site layout and building design incorporates several sustainable design features. The design approach focuses on minimising energy consumption, promoting sustainable transportation, and mitigating the heat island effect, while creating a pleasant environment for site users. Design features include:

- 15.8% deep soil zones across the site, and the integration of landscaping with communal spaces. The proposed landscape approach will maximise canopy cover and reduce the urban heat island effect.
- Use of light coloured roofing material with a low solar absorptance to reflect solar radiation and minimise heat absorption
- Rainwater harvesting to distribute rainwater to offset potable water usage
- Water efficient fixtures and fittings to reduce water consumption.
- Provision of sustainable transport infrastructure including end of trip facilities, bicycle parking spaces and provision of electric charging infrastructure for electric vehicles.
- Maximising natural light to reduce reliance on artificial lighting

- Solar panels are proposed on the multi-deck car park to harness renewable energy and reduce reliance on the power grid
- A mix of native endemic plant species which are drought resistant and suited to the local climate. There also be native flowering species strategically located across the site to create habitats for pollinators and other beneficial insects.
- Light coloured paving and concrete to reflect more sunlight and reduce heat absorption.

The ADC aims to meet or exceed industry best practice sustainability requirements within its design as part of the sustainability commitments associated with construction and operation. The ADC has been designed to operate without fossil fuels from initial occupation, demonstrating a commitment to sustainability and minimising environmental impact.

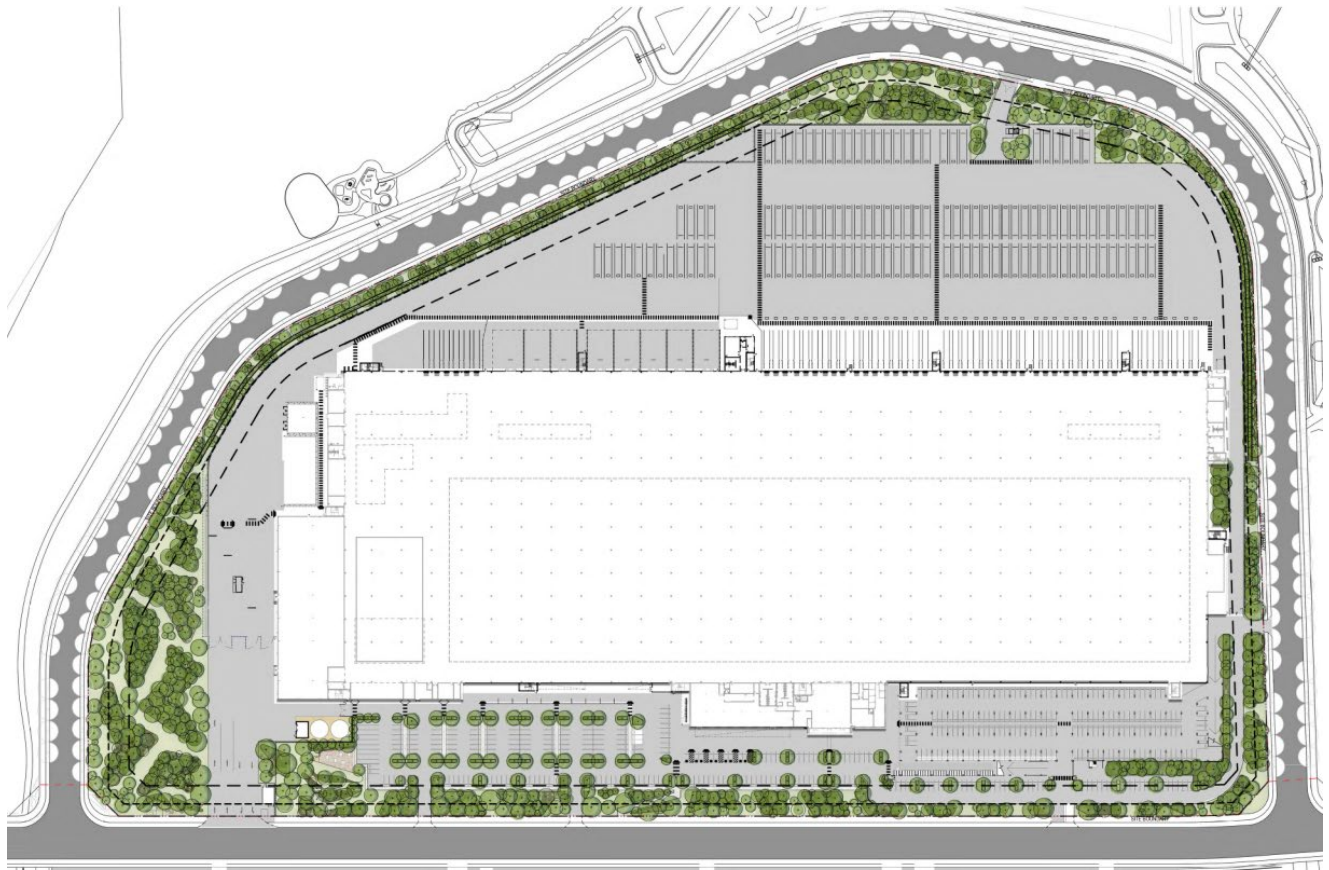
A detailed description around the broader approach to sustainability is provided within the ESD Report at Appendix P.

3.5 Landscaping

In line with the NSWGA Greener Places Policy, the site has been designed to be a high performing, multifunctional landscape which caters for social, functional and environmental requirements. Additionally, the proposal has been designed to align with the expectations for key metrics established under the IPG Master Plan. The key aspects of the design include:

- Generous deep soil setback zones around the perimeter of the site, which will accommodate a variety of landscape treatments where large canopy cover trees are prioritised
- A selection of endemic species which are drought tolerant and suited to the local climate
- Landscape feature planting within staff communal areas. A communal outdoor space is proposed in the south west corner of the site, which will include fixed benches, picnic tables, sandstone logs for informal seating, turf for passive use and landscape mounds that act as an acoustic barrier and respond to Country.
- Planting of trees which will provide a canopy cover of 14.1% of the total site area
- Incorporation of planter beds within parking areas to provide shade and amenity for car park users.
- Entry landscape feature planting and mounding – informed by the Connecting to Country narrative drawing on themes of water and landform.

Figure 15 Concept Landscape Masterplan



Source: Site Image, 2026

3.6 Access and Parking

The proposed ADC will be accessed from IPG Master Plan Road 2 and Road 3. There are 4 vehicle access points from Road 3, including:

- Truck entry and exit
- Car park entry and exit
- Car park entry and exit
- Car park entry and exit

There are 2 vehicle access points from Road 2, including:

- Car park exit
- Truck exit

Proposed loading provisions include:

- 55 loading docks comprising 46 recessed docks and 9 at-grade roller shutter doors (RSDs)
- 120 truck parking spaces

Provisions for 888 vehicle parking spaces is proposed, including 9 accessible spaces. Of these spaces, 605 parking spaces are proposed in a 3 level multi-deck car parking structure. Installation of 222 electric vehicle charging stations in the car park is proposed encouraging the adoption of electric vehicles. 9 Ute space, 32 motorcycle spaces and 40 bicycle parking spaces are proposed, as well as end of trip facilities for staff to encourage take up of active transport options.

3.7 Stormwater Management

The proposed ADC includes a large development footprint and hard stand areas, reflecting the nature of the lands use as anticipated for the site under the IPG Master Plan. Stormwater will be captured from the proposed roof and hard stand areas before being treated and discharged from the site as part of an integrated Water Cycle Management Strategy (**WCMS**). The WCMS considers the site context and proximity to adjacent stormwater infrastructure proposed as part of the IPG Master Plan, which includes Badgerys Creek to the west, an unnamed minor watercourse to the east and broader South Creek corridor in the wider precinct context.

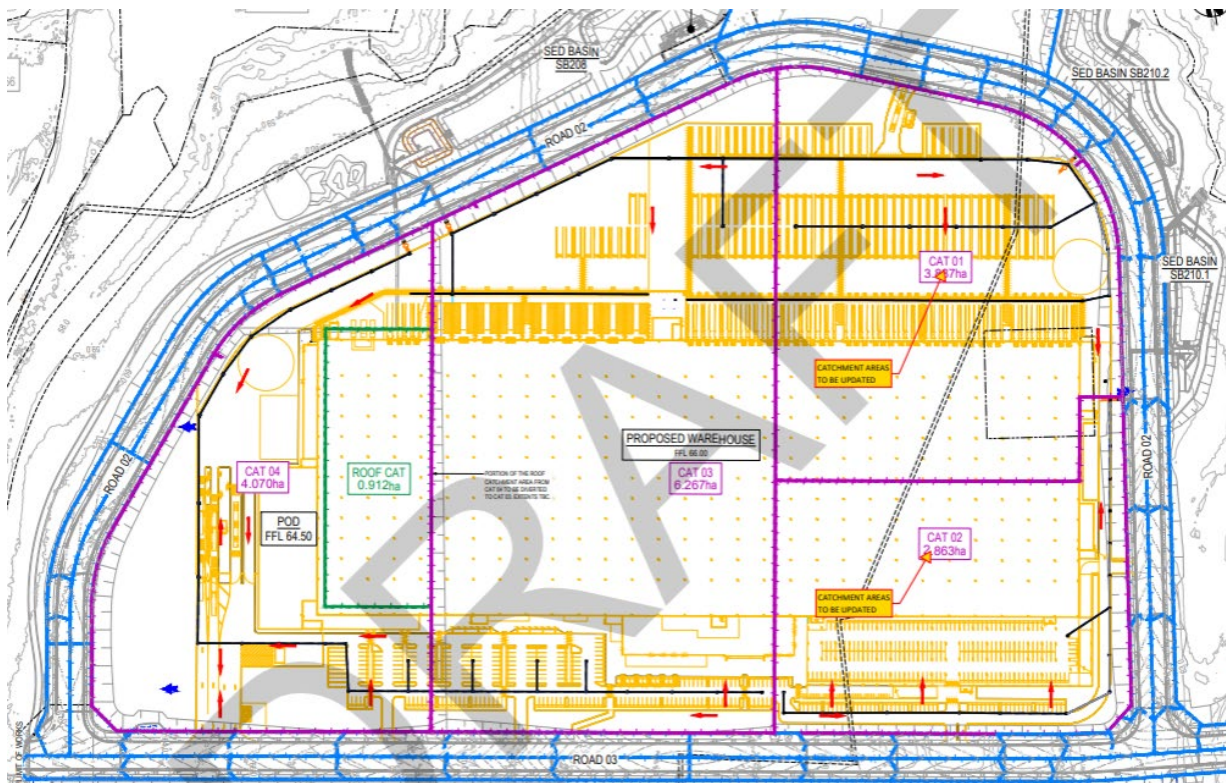
The proposed stormwater drainage system for the ADC site will comprise a minor and major system to safely and efficiently convey collected stormwater run-off from the development to the legal point of discharge. The minor system is a piped drainage system which has been designed to accommodate the 5% AEP event. The major system will be designed to cater for storms up to and including the 1% AEP event. The major system will employ the use of defined overland flow paths, such as roads and open channels, to safely convey excess run-off from the site.

The proposed drainage system will split the site into 4 separate drainage catchments. There are two catchments on the eastern and western parts of the site. This arrangement allows the two western catchments to remain separate while using a shared treatment, storage and control node prior to discharge. It allows the eastern side of the site to have a decentralised treatment and control response while maintaining the adopted 4-catchment and 4-connection point drainage framework.

To manage stormwater treatment, the following measures will be included:

- Gross pollutant traps (GPTs) located upstream of the site discharge interfaces
- Fire tank infrastructure integrated with permanent drainage response
- Penstock valves to provide flow control and operational management at the relevant treatment and control locations
- Permanent drainage infrastructure for collection, conveyance and controlled discharge of site runoff.

Figure 16 Concept Stormwater Management Plan



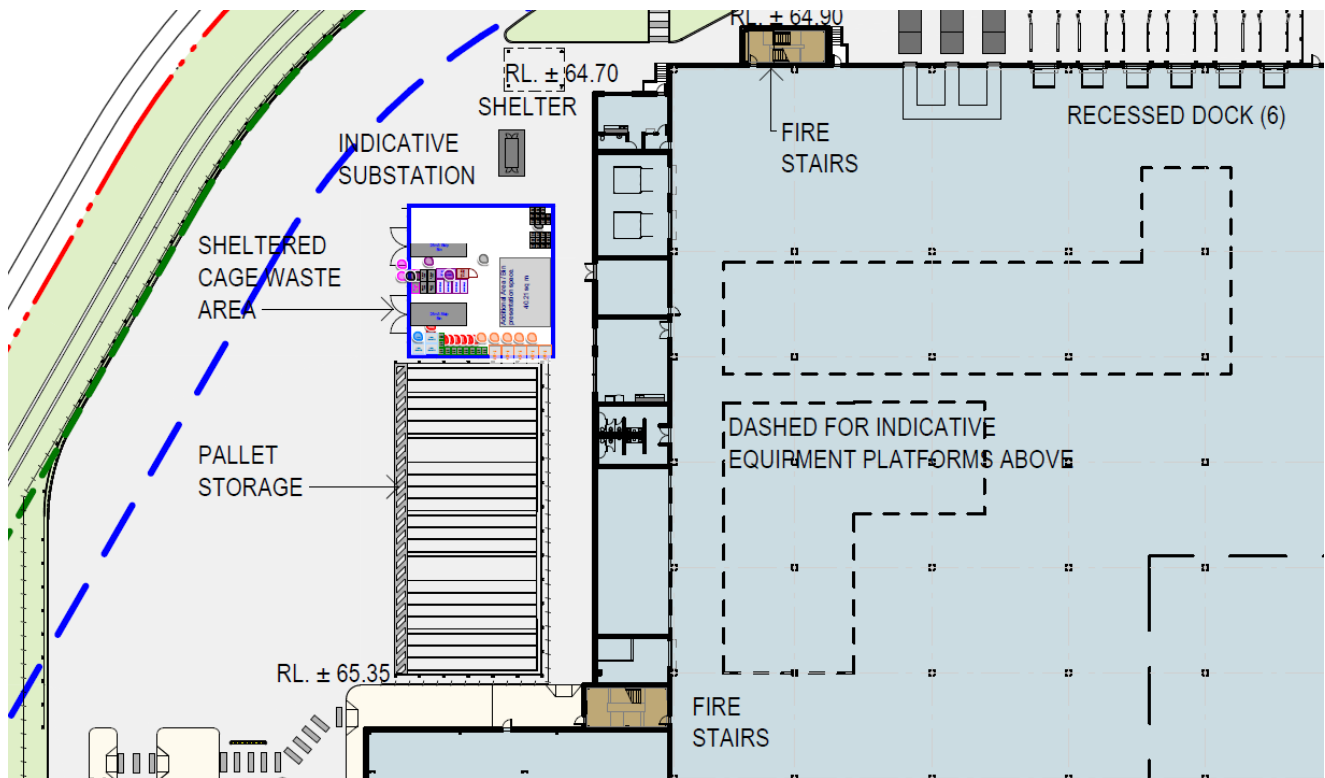
Source: AT&L, 2026

3.8 Waste Management

The ADC will incorporate waste storage areas to ensure the safe and efficient disposal of waste during operations as shown in Figure 17. Given the nature of the development and its size and scope, compactors and a hook lift waste collection service are the most likely to be used by a contractor. Where a hook lift waste vehicle isn't suitable, a 12.5m rear loader collection vehicle will be used.

All waste collections will occur on-site directly from the loading dock area located at the north of the site. It is the intention that the future tenant will be responsible for facilitating waste removal from the site via private contractor.

Figure 17 Proposed waste areas



Source, Urbis, 2026

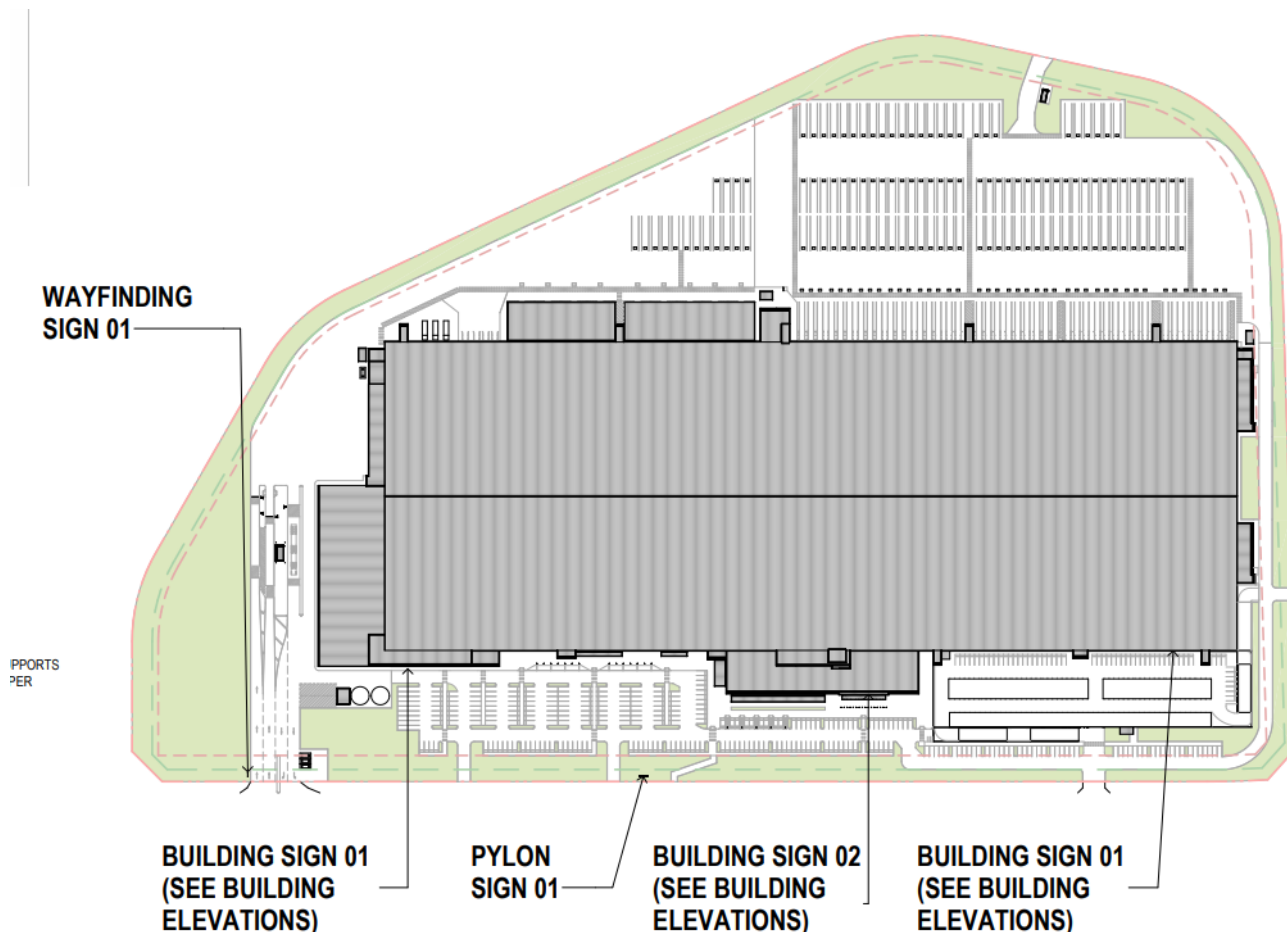
3.9 Signage

The proposed development seeks consent to construct signage as part of the proposed development to assist wayfinding and legibility. The following signs are proposed:

- 1 x pylon sign (2650mm x 3660mm x 350mm)
- 2 x illuminated face-lit building sign (2745mm x 9145mm)
- 1 x illuminated building sign (10989mm x 2475mm)
- 1 x wayfinding sign (1830mm x 1830mm)

All signs are constructed of aluminium with an acrylic finish. Figure 13 identifies the location of the proposed signage. Further details are provided in the Architectural Plans at Appendix H.

Figure 18 Signage Plan



Source: SBA, 2026

3.10 Construction Management

Construction of the ADC will be undertaken in accordance with the mitigation and management measures in this EIS package. This includes environmental protection and management measures to be adopted as part of the proposed civil works, including water and soil management and land stabilisation. Management plans will be prepared prior to construction to support the construction methodology and manage risks posed to the environment and ensure safe working conditions for workers during the delivery of the ADC. Recommendations relating to construction management are detailed within the Mitigation Measures at Appendix F.

3.11 Development Staging

The proposed ADC site will be created through subdivision prior to the completion of the ADC. The subdivision of the site, road construction and the provision of service infrastructure does not form part of the SSD scope and will be undertaken as part of the first stage of the IPG Master Plan as discussed in Section 1.3 of this EIS.

The proposed sequencing of works proposed under this SSDA is described below in Table 13. The overall construction programme is anticipated to take approximately 26 months construction and fit-out period from commencement to being operational.

Table 13 Development Staging

Construction Staging	Possible Activities
Stage 1 IPG Master Plan Works – Delivered by IPG	Identified road, stormwater, open space, active transport, bulk earthworks and utility infrastructure will be delivered as part of the proposed stage 1 Master Plan works, which will enable the development of the ADC site. These works do not form part of this SSD.
Site establishment – Delivered by the future tenant	▪ Installation of environmental controls ▪ Establishment of construction facilities
Civil works – Delivered by the future tenant	▪ Preparation earthworks ▪ Surface preparation works ▪ Utility works ▪ Stormwater civil works ▪ Infrastructure and services works ▪ Trenching and building of retaining wall structures ▪ Foundation piling works
Warehouse construction – Delivered by the future tenant	▪ Construction of the main warehouse structure ▪ Cladding and facade work
Building services and operational fit out – Delivered by the future tenant	▪ Delivery and fitout of the services, facility and, offices ▪ Delivery of operational plant and equipment ▪ Commissioning and testing ▪ Landscaping

4 Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the project, including:

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**)
- *NSW Biodiversity Act 2016* (**BC Act**)
- *Environmental Planning and Assessment Act 1979* (**EP&A Act**)
- *Environmental Planning Assessment Regulation 2021* (**the Regulations**)
- *State Environmental Planning Policy (Planning Systems) 2021* (**Planning Systems SEPP**)
- *State Environmental Planning Policy (Transport and Infrastructure) 2021* (**T&I SEPP**)
- *State Environmental Planning Policy (Resilience and Hazards) 2021* (**R&H SEPP**)
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (**B&C SEPP**)
- *State Environmental Planning Policy (Industry and Employment) 2021* (**I&E SEPP**)
- *State Environmental Planning Policy (Sustainable Buildings) 2022* (**SB SEPP**)
- *State Environmental Planning Policy (Precincts—Western Parkland City) 2021* (**WPC SEPP**)

Consideration is also required to be given to the following matters:

- *Western Sydney Aerotropolis Plan* (**Aerotropolis Plan**)
- *Western Sydney Aerotropolis Precinct Plan* (**Aerotropolis Precinct Plan**)
- *Western Sydney Aerotropolis Development Plan – Phase 2* (**Aerotropolis DCP**)
- *Ingham Property Group Badgerys Creek Road Master Plan* (**IPG Master Plan**)
- *Aerotropolis Special Infrastructure Contribution* (**SIC**)
- *Liverpool Aerotropolis S7.12 Contributions Plan* (**CP**)
- Connection with Country Framework for the Aerotropolis
- Aviation Safeguarding Guidelines for the Aerotropolis

It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

4.1 Statutory Requirements

The following sections provide a summary of the relevant statutory requirements having regard to the State Significant Development Guidelines. A detailed statutory compliance table for the project is provided Appendix B.

4.1.1 Power to Grant Approval

The legal pathway under which the consent is sought, why this pathway applies, and the relevant consent authority is outlined in Table 14.

Table 14 Power to Grant Approval

Matter	Consideration
Declaration of SSD	The EP&A Act establishes the framework for the assessment and approval of development and activities in NSW. Part 4, Division 4.7 of the EP&A Act sets out the provisions which apply to the assessment and determination of development

Matter	Consideration
	applications for SSD. Development in the Western Sydney Aerotropolis with and with an Estimated Development Cost (EDC) of more than \$30M is declared to be SSD. Schedule 1 section 29 of the Planning Systems SEPP states: 29 Development in the Western Sydney Aerotropolis <i>Development on land shown on the Land Application Map under State Environmental Planning Policy (Precincts—Western Parkland City) 2021, Chapter 4 if the proposed development—</i> <i>(a) has an estimated development cost of more than \$30 million, and</i> <i>(b) does not involve development—</i> <i>(i) prohibited under the Chapter, or</i> <i>(ii) to which that Policy, section 4.13A applies.</i> The proposed development has an estimated EDC in excess of \$30M (refer Appendix G). The proposal is for a 'warehouse or distribution centre', which is a land use that is permitted with consent in the ENT Enterprise zone, and section 4.13A ('Previously permitted development') of the Western Parkland City SEPP is not applicable. As such the proposal is SSD.
Consent Authority	Section 4.5 of the EP&A Act and section 2.7 of Planning Systems SEPP provide that the Minister for Planning is the consent authority for SSD. However, where a proposal receives over 50 submissions or a submission is made by Council, the Independent Planning Commission would be the consent authority

4.1.2 Permissibility

The permissibility of proposed development is outlined in Table 15.

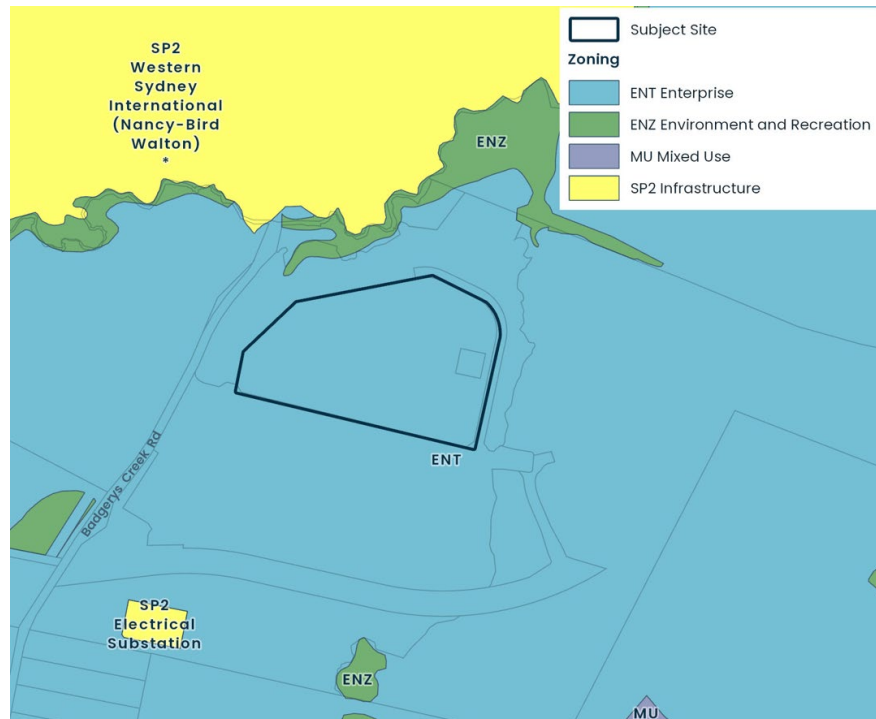
Table 15 Permissibility

Matter	Consideration
Land use(s)	Warehouse or distribution centre <i>a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises.</i> The proposed use of the site as an ADC is consistent with this definition.
Land use zone(s)	The land is zoned ENT Enterprise under the provisions of the WPC SEPP. The objectives of the zone are as follows: ▪ <i>To encourage employment and businesses related to professional services, high technology, aviation, logistics, food production and processing, health, education and creative industries.</i> ▪ <i>To provide a range of employment uses (including aerospace and defence industries) that are compatible with future technology and work arrangements.</i> ▪ <i>To encourage development that promotes the efficient use of resources, through waste minimisation, recycling and re-use.</i> ▪ <i>To ensure an appropriate transition from non-urban land uses and environmental conservation areas in surrounding areas to employment uses in the zone.</i>

Matter

Consideration

- To prevent development that is not compatible with or that may detract from the future commercial uses of the land.
- To provide facilities and services to meet the needs of businesses and workers



Warehouse or distribution centres are permitted with consent in the ENT Enterprise zone under the provisions of the WPC SEPP. The proposed development will comprise an employment use that utilises a range of technologies and support the transition of the area. It will not detract from any future commercial uses of surrounding land is therefore fully consistent with the relevant objectives of the ENT zone.

4.1.3 Other Approvals

A review of other approval requirements has been undertaken in accordance with section 4.42 of the EP&A Act. There are no other approvals identified to carry out the project, as are outlined in the table below.

Table 16 Other approvals

Matter	Consideration	
Consistent approvals s4.42 of the EP&A Act 1979	Act	Applies (Y/N)
	Fisheries Management Act 1994 (s144)	N
	Coal Mine Subsidence Compensation Act 2017 (s22)	N
	Mining Act 1992 (380A)	N
	Petroleum (Onshore) Act 1991 (s24A)	N
	Protection of the Environment Operations Act 1997 (s43)	N
	Roads Act 1993 (s138)	Y
	Pipelines Act 1967	N

Matter	Consideration
Biodiversity and Conservation Act 2016	In accordance with section 7.9(2) of the Biodiversity Conservation Act 2016 (BC Act), an SSDA is required to be accompanied by a biodiversity development assessment report (BDAR). However, a BDAR waiver may be granted should it be determined by DPHI and the DPHI Biodiversity Conservation Division that the proposed development is not likely to have any significant impact on biodiversity values. A Biodiversity Certification Report has been prepared by Ecological and is enclosed in Appendix R. It confirms that the site is located entirely on biodiversity certified land. The Sydney Region Growth Centres Biodiversity Certification was approved on 11 December 2007, which has been given effect via transitional arrangements under the NSW Biodiversity Conservation Act 2016. Development on biodiversity certified land does not require further biodiversity assessment under the <i>Biodiversity and Conservation Act 2016</i>. Notwithstanding, a Biodiversity Assessment Report was prepared as part of the IPG Master Plan. As noted in the Planning Report to support the IPG Master Plan, <i>"no clearing of existing native vegetation on non-certified land is proposed, and therefore no offsets are required"</i>.
Other approvals do not apply	Fisheries Management Act 1994 – permit under s201,205 or 219 Heritage Act 1977 – approval under part 4 or excavation permit under s139 National Parks and Wildlife Act 1974 – an Aboriginal Heritage Impact Permit, s90 Rural Fires Act 1997 – a bush fire safety authority under s100B Water Management Act 2000 – a water use approval s89, water management work approval s90 or activity approval (other than an aquifer interference approval) s91.
Other approvals	No other approvals are required.

4.2 Pre-Conditions to Granting Consent

Table 17 outlines the pre-conditions to exercising the power to grant approval, which are relevant to the project and the section where these matters are addressed within the EIS.

Table 17 Pre-Conditions

Statutory Reference	Pre-Condition	Section in EIS
Environmental Planning and Assessment Regulation 2021		
Section 35 – Additional requirements for development applications in certain areas of Sydney	A person must not apply to a consent authority for development consent to carry out development within Western Sydney Aerotropolis under Chapter 4 of the WPC SEPP unless the application is accompanied by an assessment of the consistency of the development with the relevant plan (the Western Sydney Aerotropolis Plan and Western Sydney Aerotropolis Precinct Plan). An assessment is provided against the requirements of the Aerotropolis Plan, Precinct Plan and the IPG Master Plan at Appendix B and Appendix C.	Appendix B
Section 66 – Contributions plans	Under section 66 of the EP&A Regulations, a development must not be determined by the consent authority unless a contributions plan has been approved for the land. A contribution is not required if the	Section 6.10

Statutory Reference	Pre-Condition	Section in EIS
for certain areas of Sydney	applicant has entered into a planning agreement with a planning authority under Part 7 of the Act for the matters that may be the subject of a contributions plan. The land is located within the Western Sydney Aerotropolis Special Contributions Area. A Special Infrastructure Contribution will be levied against development in this area towards the provision of regional infrastructure. The Special Infrastructure Contribution will be replaced by a Housing and Productivity Contribution from 1st July 2026. Notwithstanding, it is anticipated that transitional arrangements will apply and that a condition for the special infrastructure contribution will be imposed on the development consent, when determined in accordance with the Ministerial Direction. The land is also subject to the Liverpool s 7.12 Aerotropolis Contributions Plan. It is anticipated that a condition of consent will be imposed requiring payment of a contribution in accordance with the Contributions Plan.	
State Environmental Planning Policy (Resilience and Hazards) 2021		
Section 4.6 – Contamination and remediation to be considered in determining development application	Section 4.6 of the Resilience and Hazards SEPP requires that a consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation for the purpose for which the development is proposed to be carried out. A Detailed Site Investigation (June 2024) and Asbestos Management Plan (November 2023) was previously prepared by Senversa for the IPG Masterplan site, which incorporates the subject site. The DSI confirmed that the site can be made suitable for the land uses proposed through the masterplan subject to the implementation of the unexpected finds procedure identified in the Asbestos Management Plan. Notwithstanding, a Targeted Site Investigation (Appendix BB) and Remediation Action (RAP) (Appendix CC) have also been prepared by Geosyntec in relation to the subject site. The documents confirm that the site can be made suitable for the proposed development subject to the preparation and implementation of a RAP. It's understood that remediation works will be completed as part of site preparatory works.	Section 6, Appendix BB and Appendix CC
State Environmental Planning Policy (Transport and Infrastructure) 2021		
Section 2.122 – Traffic generating development	Section 2.122 and Schedule 3 of the T&I SEPP define development for a warehouse or distribution facility with a site area of more than 8,000sqm with access to any road as <i>traffic-generating development</i>. Before determining the development, the consent authority must give written notice to Transport for NSW and take into consideration any submission received within 21 days. Accordingly, it is acknowledged that TfNSW will be consulted regarding this application. A comprehensive assessment of the traffic, parking and access arrangements has been provided within the Traffic Impact Assessment at Appendix M, described further in Section 6.2.	Section 6.2 and Appendix M

Statutory Reference	Pre-Condition	Section in EIS
State Environmental Planning Policy (Sustainable Buildings) 2022		
Section 3.2 Development for non-residential development	Development consent must not be granted for non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified. The project responds to the sustainable design requirements as outlined in the ESD Report at Appendix P. Furthermore, an Embodied Emissions Materials Form (Appendix Q) has been prepared which quantifies embodied emissions.	Appendix P and Appendix Q
Section 3.3 Other considerations for large commercial development	Section 3.3 requires that development consent must not be granted to large commercial development unless the consent authority is satisfied the development is capable of achieving the standards for energy and water use specified in Schedule 3. The proposed development does not comprise a large commercial development. Accordingly, this pre-condition is not applicable.	N/A
State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP)		
Section 3.6 Granting of consent to signage	The consent authority must be satisfied that signage proposed is consistent with the objectives of Chapter 3 of the SEPP and satisfies the assessment criteria in Schedule 5. An assessment of the proposed signage against the objectives of Chapter 3 and assessment criteria in Schedule 5 has been included in Appendix B.	Appendix B
State Environmental Planning Policy (Precincts – Western Parkland City) 2021 – Chapter 4 Western Sydney Aerotropolis		
Section 4.17 Aircraft noise	Development consent must not be granted to noise sensitive development listed in section 4.17(5) if the development is to be located on land that is an ANEF or ANEC contour of 20 or greater. The development is located land that is ANEC contour of between 20 and 25. However, warehouse or distribution centres are not defined as a noise sensitive development under section 4.17 of the WPC SEPP.	Appendix B
Section 4.18 – Building wind shear and turbulence	Development consent must not be granted to development shown on the Lighting and Wind Shear Map or development that penetrates the 1:35 surface unless the consent authority has consulted with the Commonwealth Body. The Aviation Assessment prepared by AviPro (Appendix KK) confirms that the proposed development will not penetrate the 1:35 surface. Accordingly, the pre-condition does not apply.	Appendix KK
Section 4.19 – Wildlife hazards	Development consent must not be granted to relevant development on land in the 13km buffer unless the consent authority: - Has consulted with relevant Commonwealth body. - Considered a written assessment of the wildlife that is likely to be present on the land and the risk of the wildlife to the operation of the Airport provided by the applicant, and	N/A

Statutory Reference	Pre-Condition	Section in EIS
	Is satisfied that the development will mitigate the risk of wildlife to the operation of the Airport. The subject site does not comprise 'relevant development' as defined in the Section 4.19 of the WPC SEPP. Accordingly, this pre-condition is not applicable.	
Section 4.20 – Wind turbines	Section 4.20 states that development consent must not be granted for the purposes of a large wind monitoring tower in the 3 – 30km zone unless the consent authority has consulted the relevant Commonwealth body. It is not relevant to the proposal.	N/A
Section 4.21 – Lighting	Development consent must not be granted to development within the '6km Lighting Intensity Radius'; a 'Light Control Zone'; or a Runway Boundary' for the following development unless the consent authority has consulted the relevant Commonwealth body: - installation and operation of external lighting in connection with the development of any classified roads; freight transport facilities; heavy industrial storage establishments; recreation facilities (major); recreation facilities (indoor); - any with construction works that is likely to be obtrusive or create light spill outside the land on which the construction works are carried out. The site is located within the 6 km lighting intensity radius as shown on the Lighting Intensity Windshear map. Accordingly, it is acknowledged that consultation with the relevant Commonwealth authority may be required prior to the commencement of construction works. A detailed Construction Management Plan will be prepared post-consent (subject to the approval of the SSDA).	Appendix B
Section 4.22 – Airspace operations	This section applies to development on land shown on the Obstacle Limitations Surface (OLS) Map that is a controlled activity within the meaning of Part 12, Division 4 of the Airports Act 1996. It requires that development consent is not granted to development unless: - the consent authority has consulted the relevant Commonwealth body - the Commonwealth body has advised the consent authority that the development will penetrate the prescribed airspace but does not object to it or that the development will not penetrate the prescribed airspace. The Aviation Impact Assessment at Appendix KK confirms that the ADC is within the lateral extents of the WSI Obstacle Limitation Surfaces (OLS). The proposed building will be approximately 35m below the level of the OLS Inner Horizontal Surface and will therefore remain below the OLS.	Appendix K
Section 4.23 – Public safety	Development consent must not be granted for a purpose not specified in section 4.23(2) unless the consent authority has considered a written assessment of the risk of the development to persons provided by the applicant and is satisfied that the development within a public safety area will adequately mitigate	N/A

Statutory Reference	Pre-Condition	Section in EIS
	the risks to persons on the land including by limiting the number of people or vehicles. The site is not located within an identified public safety area. Accordingly, this pre-condition does not apply to the proposed development.	
Section 4.23A – Operation of certain air transport facilities	Development must not be granted to development on land shown as the 'Building Restricted Area' unless the consent authority has consulted the relevant Commonwealth body and it is satisfied that the development will not adversely impact the operation of communication and air traffic control facilities or structures associated with the Airport's air transport facilities. The site is not located within the Building Restricted Area. Accordingly, this pre-condition does not apply to the proposed development.	N/A
Section 4.24 – Flood planning	Section 4.24 applies to land within the flood planning area or below the flood planning level, requiring the consent authority to be satisfied that the development demonstrates several flood related criteria. The site is not located within the Flood Planning Area. Additionally, the Flood Risk Assessment (Appendix W) prepared by AT&L confirms that the proposed development will be located above the Flood Planning Level.	Appendix W
Section 4.25 – Preservation of trees and vegetation in the Environment and Recreation Zone and Cumberland Plain	This section relates to land zoned Environment and Recreation Zone or shown as existing native vegetation on the High Biodiversity Values Map. It states that development consent must not be granted for the clearing of any native vegetation without development consent. It also identifies the matters that the consent authority must be satisfied of in relation to the disturbance of native vegetation caused by clearing prior to granting consent. As noted above, the subject site is not zoned Environment and Recreation and does not contain existing native vegetation (as mapped). Accordingly, no further consideration of this section is necessary.	N/A
Section 4.25A – Clearing of native vegetation	This section relates to land shown as existing native vegetation on the High Biodiversity Values Map. Development must not be granted to development on the land unless the consent authority is satisfied that the development will not result in clearing of native vegetation. Section 4.25(4) relates to development carried out by or on behalf of a public authority. As noted above, the site does not contain existing native vegetation (as mapped). Accordingly, no further consideration of this section is necessary.	N/A
4.26 – Heritage Conservation	Section 4.26 relates to development proposed on Aboriginal places of heritage significance. Before granting consent to development in an Aboriginal place of heritage significance, the consent authority must notify the local Aboriginal communities about the application and take into consideration a response received within 28 days.	Appendix FF

Statutory Reference	Pre-Condition	Section in EIS
	It also requires and requires the consent authority to consider the effect of the proposed development on the heritage significance of the place and a known (or reasonably likely to be located) Aboriginal object at the place. The site is identified as having areas of Aboriginal cultural sensitivity (moderate) across the periphery as identified by the Western Sydney Aerotropolis Precinct Plan. An Aboriginal Cultural Heritage Assessment (ACHA) was prepared for the approved IPG masterplan. An addendum to the ACHA has subsequently been prepared by Ecological and is included in Appendix FF. The ACHA addendum concludes that no changes to the findings or recommendations of the masterplan ACHAR are warranted based on updated searches or continued consultation. The Applicant acknowledges that DPHI will consult with local Aboriginal communities following the lodgement of the SSDA. Responses received will be considered as part of the Response to Submissions phase.	
Section 4.27 – Transport corridors	The consent authority must obtain concurrence from Transport for NSW for development on transport corridor land with an EDC greater than \$200,0000 and/or development that penetrates the ground to a depth of at least 2 metres below ground level (existing) on land within 25 metres (measured horizontally) of transport corridor land. The proposed development is not on transport corridor land and will not penetrate ground within 25 metres of a transport corridor. Accordingly, no further consideration of this pre-condition is required.	N/A
Section 4.28 – Warragamba Pipeline	Section 4.28 includes a pre-condition relating to land shown as the Warragamba Pipeline. The site is not within this land. Accordingly, no further consideration of this pre-condition is required.	N/A
Section 4.28A – Sydney Science Park	Section 4.28 includes a pre-condition relating to land identified as Sydney Science Park. The site is not within this land. Accordingly, no further consideration of this pre-condition is required.	N/A
Section 4.28B – Aboriginal Cultural Guidelines	Section 4.28B requires the consent authority to consider Recognise Country: Guidelines for development in the Aerotropolis (November 2022). A recognise Country Response template has been completed as part of this SSDA, which outlines how the proposal addresses the guidelines, and is enclosed in Appendix E.	Appendix E
Section 4.31 – Design Review Panel	Section 4.31 states that development consent must not be granted to the development (including state significant development) unless a design review panel reviews the development; the findings of the review have been taken into account by the consent authority; and the consent authority is of the opinion that the development exhibits design excellence. However, section 4.30 confirms that the provision does not apply to development on land to which a master plan applies if the consent authority is satisfied that the master plan adequately provides for assessment of the design quality of the development.	Appendix J

Statutory Reference	Pre-Condition	Section in EIS
	The IPG Master Plan includes a Design Quality Strategy, which has been prepared in collaboration with the NSW Government Architect. This EIS has utilised the DQS for the purpose of satisfying design excellence. The ADC project is categorised as a large-scale project, requiring an independent peer review be undertaken, which is included at Appendix J. Accordingly, a detailed Peer Review has been undertaken by Watson Young Architects. The review confirms that proposed development exhibits design quality and complies with the requirements of Section 14 – Design Quality Strategy of the IPG Master Plan. Accordingly, the proposal has adequately demonstrated that the design exhibits design excellence and no further assessment is required.	
Section 4.32 – Architectural design competition	Section 4.32 includes a pre-condition relating to Architectural Design Competitions. However, as the site is subject to a master plan that includes a Design Quality Strategy, the pre-condition does not apply.	N/A
Section 4.42 Consent authority to consider master plan	The consent authority is required to consider the masterplan for any development proposed on land in the Aerotropolis to which a masterplan applies. The proposed development has been designed with regard to the relevant provisions of the IPG Master Plan as described in Section 6 of the EIS and the Appendix C. A verification assessment has also been prepared by SBA	Section 6 Appendix C
Section 4.49 Public utility infrastructure	Development consent must not be granted to development unless the consent authority is satisfied that essential public utility infrastructure is available or will be made available when required. An Infrastructure Delivery Strategy was prepared to inform the IPG Master Plan. Identified road, stormwater, open space, active transport and utility infrastructure will be delivered as part of the proposed Master Plan works, which will enable the development of the ADC. These works have been approved under separate planning pathways and are not subject to this SSD. The estate utility works will be delivered prior to the operation of the proposed development. All infrastructure works associated with the proposed ADC are detailed within the Civil Drawings at Appendix V and detailed within the Civil Report at Appendix Y.	Appendix V and Appendix Y
State Environmental Planning Policy (Biodiversity and Conservation) 2021		
Section 6.6. Water quality and quantity	Section 6.6 states that development consent must not be granted to development on land in a regulated catchment unless the consent authority is satisfied that the effect on the quality of water entering a natural waterbody will be as close as possible to neutral or beneficial and the impact on water flow in a natural waterbody will be minimised. An Integrated Water Management Strategy has been prepared by AT&L (Appendix Z), which details the measures that will be	Appendix Z

Statutory Reference	Pre-Condition	Section in EIS
	implemented to minimise impacts of the development on the quality of water leaving the site.	
Section 6.7 Aquatic ecology	Development consent must not be granted to development on land in a regulated catchment unless the consent authority is satisfied that the direct, indirect or cumulative adverse impact on terrestrial, aquatic or migratory animals or vegetation will be kept to the minimum necessary; the development will not have an adverse impact on aquatic reserves; the erosion of land abutting a natural waterbody or the sedimentation of a natural waterbody will be minimised; and the adverse impact on wetlands will be minimised. The proposed development involves the construction of a warehouse on a fully cleared site, which contains a development pad. Additionally, an Integrated Water Management Strategy (Appendix Z) and Erosion Sediment Control Plan (Appendix NN) have been prepared by AT&L, which demonstrate how the proposed development will minimise impacts on surrounding waterbodies.	Appendix Z and Appendix NN
Section 6.8 Flooding	Development consent must not be granted to development on flood liable land in a regulated catchment unless the consent authority is satisfied that the development will not result (if there is a flood) in a release of pollutants that may have an adverse impact on the water quality of a natural waterbody or have an adverse impact on the natural recession of floodwaters into wetlands and other riverine ecosystems. An Integrated Water Management Plan (Appendix Z) and Erosion Sediment Control Plan (Appendix NN) have been prepared by AT&L, which demonstrate how the proposed development will achieve the relevant water quality targets for the site and minimise impacts on surrounding waterbodies.	Appendix Z and Appendix NN
Section 6.9 Recreation and public access	Development consent must not be granted to development on land in a regulated catchment unless the consent authority is satisfied that the development will maintain or improve public access to and from natural waterbodies for recreational purposes without adverse impact on the waterbody, watercourse or riparian corridors; and new or existing points of public access between natural waterbodies and the site will be stable and safe. Additional provisions apply to land forming part of the foreshore of a natural waterbody. The proposed development will not impact any points of access to natural waterbodies and is not located on the foreshore of a natural waterbody.	N/A
Section 6.10 Total Management Catchment	In deciding whether to grant development consent to development on land in a regulated catchment, the consent authority must consult with the council of each adjacent or downstream local government area on which the development is likely to have an adverse environmental impact. It is acknowledged that DPHI will consult with the relevant councils during the exhibition of the SSDA.	N/A

4.3 Mandatory Considerations

Table 18 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 18 Mandatory Consideration

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulations		
Section 1.3	Relevant objects of the EP&A Act.	Throughout EIS
Section 4.15 (1)(a)(i) Relevant environmental planning instrument	All relevant EPIs will be addressed in the EIS, these include: - SEPP Planning Systems - SEPP Transport and Infrastructure - SEPP Resilience and Hazards - SEPP Biodiversity and Conservation - SEPP Industry and Employment - SEPP Sustainable Buildings - SEPP Precincts – Western Parkland City	Section 4 and Appendix B
Section 4.15 (1)(a)(iii) Relevant development control plan	The Western Sydney Aerotropolis Development Control Plan – Phase 2 is the relevant DCP which applies. An assessment of the proposed development against the DCP requirements is provided at Appendix D. The IPG masterplan also includes additional and alternative controls to the DCP. An assessment of the proposal against the relevant provisions of the masterplan has also been provided in Appendix C.	Appendix C and Appendix D
Section 4.15 (1)(a)(iiiia) any planning agreement or draft planning agreement	Not relevant to the proposed development. IPG have entered into a Planning Agreement as part of the approved IPG Master Plan.	N/A
Section 4.15 (1)(a)(iv) relevant matters prescribed by the Regulations.	Section 35 and Section 66 of the regulations apply and have been addressed in Table 17.	Table 17
Section 4.15(1)(b) the likely impacts of that development,	The likely impacts of the development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality is addressed in Section 6 of this EIS.	Section 6
Section 4.15(1)(c)	The suitability of the site for the development is addressed in Section 7 of this EIS.	Section 7
Section 4.15(1)(d)	Any submissions made in accordance with the Act or regulations.	Section 5

Statutory Reference	Mandatory Consideration	Section in EIS
	Early engagement with the community and agencies has been undertaken as set out in Section 5 of this EIS. A detailed response to any submissions will be provided following lodgement and public exhibition of the SSDA package.	
Section 4.15(1)(2)	The public interest. The public interest of this project is addressed in Section 7 of this EIS. Given the alignment of the project with Federal, State and local strategic policy it is considered that the project is in the public interest.	Section 7
Mandatory relevant considerations under EPIs		
State Environmental Planning Policy (Planning Systems) 2021	Chapter 2 – State and Regional Development	Appendix B
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.122 – Traffic-generating development.	Section 4 and Appendix M
State Environmental Planning Policy (Resilience and Hazards) 2021	Section 4.6 Contamination and remediation to be considered in determining development application	Section 4 and Appendix CC and Appendix DD
State Environmental Planning Policy (Biodiversity and Conservation) 2022	Chapter 6 Water catchments	Appendix B
State Environmental Planning Policy (Industry and Employment)	Chapter 3 Advertising and Employment	Appendix H
State Environmental Planning Policy (Sustainable Buildings) 2022	Section 3.2 – Development consent for non-residential development.	Appendix P
State Environmental Planning Policy (Precincts – Western Parkland City) – Chapter 4	The proposed development is permitted with consent in accordance with section 7.9(3) of the WPC SEPP. The relevant pre-conditions are outlined in the table above. Further assessment or relevant considerations is provided in Appendix B.	Section 4 and Appendix B
Considerations under other legislation		
Biodiversity Conservation Act 2016 (BC Act)	The site is located on biodiversity land (certified in 2010 as part of the biodiversity certification of the Sydney Regional Growth Centres SEPP). Part 7 of the BC Act ('Biodiversity assessment and approvals under Planning Act') does not apply to development on	Appendix R

Statutory Reference	Mandatory Consideration	Section in EIS
	biodiversity certified land. Part 8.4 (2) of the BC Act states in relation to Development under Part 4 of the Planning Act (including State significant development): An assessment of the likely impact on biodiversity of development on biodiversity certified land is not required for the purposes of Part 4 of the Environmental Planning and Assessment Act 1979. Further 8.4(3) states that: <i>A consent authority, when determining a development application in relation to development on biodiversity certified land under Part 4 of the Environmental Planning and Assessment Act 1979, is not required to take into consideration the likely impact on biodiversity of the development carried out on that land.</i> Refer to the Biodiversity Certification Report (Appendix R) for further information.	
Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	Chapter 2 of the EPBC Act establishes controls for assessing and regulating the environmental impact of activities (including development) where Matters of National Environmental Significance (MNES) may be affected. Under the EPBC Act, any action which has, will have, or is likely to have a significant impact on MNES is defined as a “controlled action” and requires approval from the relevant Commonwealth Minister. Assessment of significance is required in accordance with the Significant Impact Guidelines 1.1 – Matters of National Environmental Significance published by the Commonwealth Department of Agriculture, Water and the Environment (DAWE). Notwithstanding the bio-certification, a biodiversity assessment was undertaken as part of the IPG Master Plan request, which confirms the land subject to the Master Plan will be exempt from further assessment of threatened species and endangered ecological communities listed under either the NSW BC Act or Commonwealth EPBC Act if the approved Master Plan is undertaken in accordance with the relevant requirements.	Appendix R
Federal Airports Act 1996	An Aviation Impact Assessment (Appendix KK) has been prepared by AviPro to inform the EIS. This assessment considers the Airports Act and associated Regulations. The Regulations provide for the Commonwealth Department of Infrastructure, Transport, Regional Development and Communications for approval of controlled activities that penetrate primary surfaces (e.g PANS-OPS) and the relevant airport operator to approve controlled activities that penetrate secondary surfaces (e.g OLS).	Appendix KK
Rural Fires Act 1997	Planning for Bushfire Protection (NSW Rural Fire Service 2018) has been considered in the design of the development. A Bushfire Assessment Report is provided at Appendix JJ that includes an assessment of the Act. Further environmental assessment has been included in Section 6 of this EIS.	Appendix JJ
Roads Act 1993	Section 138 regulates works and structures in, on or over a public road including requirements for concurrence from TfNSW.	Section 6.2

Statutory Reference	Mandatory Consideration	Section in EIS
	The Guide for Traffic Generating Developments has been considered as part of the Transport Assessment for the project and has been assessed within Section 6.2.	
Precinct Plan		
Western Sydney Aerotropolis Precinct Plan	The Aerotropolis Precinct Plan has statutory weight under Chapter 4 of the WPC SEPP. An assessment of this project against the Precinct Plan is provided in Appendix B	Appendix B
Development Control Plan		
Western Sydney Aerotropolis Development Control Plan	The Western Sydney Aerotropolis Development Control Plan outlines the planning, design, and environmental objectives and controls that are to guide the preparation and assessment of Development Applications (DAs). These objectives and controls complement those in Chapter 4 of the WPC SEPP and the Western Sydney Aerotropolis Precinct Plan. Section 2.10 of the Planning Systems SEPP states that development control plans do not apply to state significant development. Notwithstanding, for completeness, an assessment of the proposed development against the DCP is provided in Appendix D.	Appendix D
IPG Masterplan	The IPG Master Plan was adopted in July 2025 and sets out a development vision for the wider IPG estate, phasing of key infrastructure and related works, and additional and alternative development controls to the those outlined in the DCP. An assessment of the proposal against the relevant provisions of the IPG Master Plan is included in Appendix C.	Appendix C

5 Engagement

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and the community engagement which will be carried out if the project is approved.

It is important to acknowledge the extensive engagement undertaken as part of the TAP process associated with the IPG Master Plan, given the relationship with the ADC project. It is noted that further to the TAP, public consultation on the IPG Master Plan has recently been completed.

5.1 Engagement Carried Out

Community and stakeholder engagement has been undertaken by the Project Team in the preparation of the SSDA. Consultation was also undertaken with the certain stakeholders to inform the detailed assessment of key matters. The engagement carried out for the project is outlined in Table 19.

Table 19 Engagement Carried Out

Engagement activities	Target stakeholder(s)	Details
 Project newsletter	Community	On 5 March 2026 a project newsletter was distributed to 111 properties surrounding the site. This newsletter (see Appendix A) provided an overview of the development application proposed and how residents and surrounding businesses could make enquiries, request further information and provide feedback. The distribution area of this newsletter can be found in Appendix B.
 Key stakeholder briefings	Western Sydney Aerotropolis Community Consultative Committee (WSACCC)	On 5 March 2026, Urbis contacted the WSACCC requesting an opportunity to present about the proposal and seek feedback at the next WSACCC meeting. On 15 April 2026, representatives from the project team attended the WSACCC online meeting and provided an overview of what's proposed, the project's contribution to the Western Sydney Aerotropolis vision, the anticipated areas of impact and the approach to community consultation. Following the presentation, Urbis facilitated question and answer time. Feedback received during this time is outlined in Section 5.
 SIA community survey	Accessible to all stakeholders	The project newsletter (see above) included an invitation to participate in an online survey to inform the SIA. No completed responses to the SIA survey have been received.
 Enquiry lines	Accessible to all stakeholders	Throughout the engagement program, Urbis Engagement provided the community and stakeholders with an 1800 number and email address to make enquiries and provide feedback. At the time of writing this report, one phone call and no email enquiries have been received.

This engagement outlined above was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements in the SEAR.

In accordance with the Regulations, the EIS will be placed on formal public exhibition once DPHI has reviewed the EIS and deemed it 'adequate' for this purpose. Following this exhibition period, the applicant will respond to any matters raised by notified parties.

5.2 Community Views

The key issues raised by the community and key stakeholders are summarised in the table below. A detailed community engagement table is provided as Appendix II which details the way in which these issues have been addressed in the EIS.

Table 20 Key Stakeholders: Issues raised and project response

Stakeholder	How this group was consulted	Issues and feedback discussed	Project response
Government Authorities			
NSW Department of Planning, Housing and Infrastructure (DPHI)	An initial briefing meeting was held with DPHI on 19th December 2025 to introduce officers to the proposed development. A scoping meeting was held with DPHI on 30th January 2026 to discuss key assessment matters. The project team communicated their intention to lodge SEARs shortly after.	During the meeting, the key assessment matters to be addressed in the EIS were discussed.	The EIS and accompanying technical reports have been prepared to address the SEARs
Liverpool City Council ▪ Planning and Assessment Team	Liverpool City Council's Planning and Assessment were provided with a copy of the Request for SEARs and were afforded the opportunity to comment.	To date, no response has been received from Liverpool City Council's Planning and Assessment team.	The project team will be available to respond to enquiries from Liverpool City Council's Planning and Assessment team as the project progresses. The application will be referred to Liverpool City Council for comment during the public exhibition period.
▪ Social Infrastructure and Community Planning team	On 7 April 2026, Urbis contacted Liverpool City Council's Social Infrastructure and Community Planning team with an invitation to attend a stakeholder interview to inform the Social Impact Assessment for the project.	To date, no response has been received from Liverpool City Council's Social Infrastructure and Community Planning team.	The project team will be available to respond to enquiries from Liverpool City Council's Social Infrastructure and Community Planning team as the project progresses.
Relevant agencies			
Bradfield Development Authority	On 19 December 2025, landowners in the Aerotropolis attended Bradfield	As noted in its SEARs advice, the Bradfield Development Authority did not	The project team will be available to respond to enquiries from the Bradfield

Stakeholder	How this group was consulted	Issues and feedback discussed	Project response
	Development Authority's regular monthly meeting to provide an update on progress within the IPG Master Plan site.	provide any specific comments on the proposal.	Development Authority as the project progresses.
	On 19 December 2025, the project team met with representatives from the Bradfield Development Authority's Investment Attraction team and Investment NSW to discuss how the applicant could positively contribute to the Aerotropolis Vision.	Support was received for the potential contribution to the economy, innovation and advanced manufacturing objectives of the Aerotropolis.	
Civil Aviation Safety Authority	On 27 March 2026, AviPro, on behalf of the applicant contacted the Civil Aviation Safety Authority (CASA) to provide an overview of the proposal and request feedback.	On 1 April 2026, CASA responded advising it does not consider the proposal as a hazard to aircraft operations and has no objection to the proposal proceeding as planned.	The project team will be available to respond to enquiries from CASA team as the project progresses.
Commonwealth Department of Infrastructure, Transport, Regional Development, Communications and the Arts Western Sydney International Flight Paths team	On 24 March 2026, Urbis, on behalf of the proponent contacted the Commonwealth Department of Infrastructure, Transport, Regional Development, Communications and the Arts Western Sydney International Flight Paths team to provide an overview of the proposal, share the Scoping Report and request feedback.	To date, no response has been received from the Commonwealth Department of Infrastructure, Transport, Regional Development, Communications and the Arts Western Sydney International Flight Paths team.	The project team will be available to respond to enquiries from the Commonwealth Department of Infrastructure, Transport, Regional Development, Communications and the Arts Western Sydney International Flight Paths team as the project progresses.
Department of Climate Change, Energy, the Environment and Water	On 31 March 2026, Urbis, on behalf of the proponent contacted the Conservation	To date, no response has been received from CPHR.	The project team will be available to respond to enquiries from CPHR as the project progresses.

Stakeholder	How this group was consulted	Issues and feedback discussed	Project response
Conservation Programs, Heritage and Regulation (CPHR) Group	Programs, Heritage and Regulation (CPHR) Group to provide an overview of the proposal, acknowledge the SEARs advice and request any additional feedback on the proposal.		
Water Group	On 31 March 2026, Urbis, on behalf of the proponent contacted the Water Group to provide an overview of the proposal, acknowledge the SEARs advice and request any additional feedback on the proposal.	To date, no response has been received from the Water Group.	The project team will be available to respond to enquiries from the Water Group as the project progresses.
Heritage NSW	On 31 March 2026, Urbis, on behalf of the proponent contacted Heritage NSW to provide an overview of the proposal, acknowledge the SEARs advice and request any additional feedback on the proposal.	To date, no response has been received from Heritage NSW.	The project team will be available to respond to enquiries from Heritage NSW as the project progresses.
Department of Primary Industries – Agriculture	On 24 March 2026, Urbis, on behalf of the applicant contacted the Department of Primary Industries (DPI) – Agriculture to provide an overview of the proposal, share the Scoping Report and request feedback.	On 25 March 2026, DPI's Agricultural Land Use Planning Team responded advising its requirements were provided in its SEARs advice and reiterated that the Land Use Conflict Risk assessment must identify and consult with key stakeholders, including neighbours, to assess any actual, potential, or perceived risks. Biosecurity should also be considered and	The Land Use Conflict Risk assessment prepared by Edge Land Planning and lodged with the proposal has considered all requirements requested by DPI.

Stakeholder	How this group was consulted	Issues and feedback discussed	Project response
		assessed independently of biodiversity considerations	
Endeavour Energy	On 13 April 2026, AT&L contacted Endeavour Energy to provide an overview of the proposal and confirm servicing requirements.	To date no response has been received from Endeavour Energy.	The project team will continue to work with Endeavour Energy as the project processes, responding to, and addressing the points raised in its advice once received.
Fire & Rescue NSW	On 10 March 2026, Acor, on behalf of the applicant and in response to the SEARs advice, contacted Fire & Rescue NSW to provide an overview of the proposed handling and storage of dangerous goods within the project. Acor confirmed that dangerous goods will not be stored within the automated storage and retrieval system and instead will be managed separately in accordance with relevant standards, and to seek any feedback or concerns with this approach.	On 11 March 2026, Fire & Rescue NSW advising that the project was only flagged during the SEARS process, as the development has the potential to present an elevated risk and that it would conduct a full assessment following the lodgement of the proposal.	The project team will be available to respond to enquiries from the Fire & Rescue NSW as the project progresses.
NSW Rural Fire Service	Blackash on behalf of the applicant contacted the NSW Rural Fire Service (RFS) to provide an overview of the approach to bushfire risk management.	On 19 March 2026, NSW RFS responded advising its comments were included in the SEARs advice. NSW RFS advised a site specific Bushfire Risk Management Plan is required for the project.	A site specific Bushfire Risk Management Plan has been prepared and lodged with the SSDA.

Stakeholder	How this group was consulted	Issues and feedback discussed	Project response
Sydney Water	On 25 February 2026, AT&L, on behalf of the applicant, lodged a Feasibility Application with Sydney Water.	To date, feasibility advice has not yet been received by Sydney Water.	The project team will continue to work with Sydney Water as the project processes, responding to, and addressing the points raised in its advice once received.
Transport for NSW	On 1 May 2025, Ason Group on behalf of the applicant contacted TfNSW to provide an overview of the proposal, scoping report, key findings of the traffic and transport assessment and request feedback.	To date no response has been received from TfNSW.	The project team will be available to respond to enquiries and feedback from TfNSW as the project progresses.
Western Sydney Airport Corporation	On 24 March 2026, Urbis, on behalf of the proponent contacted Western Sydney International Airport to provide an overview of the proposal, share the Scoping Report and request feedback.	To date, no response has been received from Western Sydney International Airport.	The project team will be available to respond to enquiries from Western Sydney International Airport as the project progresses.
Aboriginal stakeholders			
- Dharug Traditional Custodians - Deerubbin Local Aboriginal Land Council	Aboriginal Stakeholders were consulted as part of the Aboriginal Cultural Heritage Assessment (ACHA) prepared for the IPG Master Plan and therefore no additional consultation occurred for this proposal. A detailed summary of this process and evidence of continuous consultation can be found in the ACHA Addendum Report lodged with the SSDA.		
Community			
- Surrounding community - Identified in Figure 5 of the Engagement Outcomes Report	On 5 March 2026, Urbis distributed a double sided A4 newsletter that provided an overview of the proposal, the associated benefits and impacts	To date, no feedback has been received from the community.	Urbis will continue to be available to respond to community enquiries as the project progresses.

Stakeholder	How this group was consulted	Issues and feedback discussed	Project response
	and how the community could provide feedback		
Identified for Land Use Conflict Risk Assessment	As part of the Land Use Conflict Risk Assessment, Edge Land Planning distributed a letter to near neighbours providing information about the proposal and inviting them to participate in an interview to inform the assessment.	On 19 March 2026, a near neighbour contacted Urbis requesting information about the Assessment and contact details on how to participate. All feedback received as part of this assessment has been included in the Land Use Conflict Risk Assessment Report lodged with the SSDA.	
Ingham Property Group	Urbis, on behalf of the applicant, has been in ongoing consultation with Ingham Property Group as the landowner of the site and applicant of the IPG Master Plan		
ALDI	In addition to the newsletter distribution, adjoining owners/operators (including ALDI and Goodman) were directly advised of the project in April 2026.	No comments or feedback was provided by ALDI.	The project team will be available to respond to enquiries from ALDI as the project progresses.
Goodman Property Services	In addition to the newsletter distribution, adjoining owners/operators (including ALDI and Goodman) were directly advised of the project in April 2026.	To date, no response has been received from Goodman.	The project team will be available to respond to enquiries from Goodman as the project progresses.
Western Sydney Aerotropolis Community Consultative Committee	On 14 April 2026, Urbis attended the regular WSACCC meeting to present on the proposal and seek feedback. On 15 April 2026, Urbis provided an account of the consultation with the WSACCC and a copy of the	On 14 April 2026, three members of the Urbis team attended the WSACCC meeting on behalf of the Applicant. Questions and feedback related to the project were raised on:	Car parking Urbis confirmed that the car spaces did relate to the anticipated 1,800 jobs that will be created when the site is operational.

Stakeholder	How this group was consulted	Issues and feedback discussed	Project response
	presentation to the Committee via email.	Car parking It was noted by the Chair of the Committee, Professor Roberta Ryan, that there is a high number of car parking spaces and the question was raised if this was in relation to the number of jobs projected for the site when operational. Land use and purpose Professor Roberta Ryan requested an explanation of what a distribution centre is and its purpose. Site operator Professor Roberta Ryan explained to the WSACCC that often consent is sought for the site's development prior to the operator being confirmed. Professor Ryan asked if this was the case for this site. Landscaping A committee member asked if 15 per cent landscaping is the minimum ratio for an Enterprise Zone site. Construction A committee member asked what the timeframe for construction would be. Traffic and roads Two committee members raised concerns and questions about:	Land use and purpose Urbis explained that a distribution centre is a facility used to receive goods via air, rail or truck. Goods are then dispatched via trucks or vans from the facility to other locations and customers including businesses and consumers. Site operator Urbis confirmed that the operator has not yet been announced. Landscaping Urbis confirmed that 15 per cent is not the minimum or a universal minimum requirement for Enterprise Zone land. Landscaping ratios for Enterprise Zones are set through the relevant planning scheme and depend on the specific zone, any applicable overlays, and the local planning policy. Construction Urbis confirmed that, pending approval, early works would commence in 2026 with site construction commencing in 2027 – 2028, taking 12 to 18 months to complete. Traffic and roads A Traffic Impact Assessment is being prepared as part of the EIS.

Stakeholder	How this group was consulted	Issues and feedback discussed	Project response
		▪ The timing of construction and the cumulative impact on the surrounding community due to traffic congestion and road conditions/safety. Feedback was that it has taken more than 25 minutes to drive 2.2km. ▪ Concerns were raised specifically about Badgerys Creek Road collapsing due to heavy vehicle use. Overall, there was support for the development from the committee but concern about the impact on local roads. Committee member, Ed Scully, Director South West Precinct, Transport for NSW, provided insight on the timings of upgrades to Mamre Road and Badgerys Creek Road. Professor Ryan conveyed to the Urbis team that a key consideration for all projects will be the traffic and road infrastructure impacts for local communities surrounding the Aerotropolis and will need to be considered as part of Traffic Impact Assessments.	

6 Assessment of Impacts

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts.

Detailed tables have been provided within the appendices as outlined in Table 21. This information includes a reference to where these matters have been addressed in the EIS.

Table 21 Key Appendices

Key Appendix	Reference
SEARs compliance table	Appendix A
Statutory compliance table	Appendix B
DCP compliance table	Appendix D
Proposed mitigation measures table	Appendix F

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections. Importantly, it is noted that the proposed development sits within a broader masterplan framework, which was the subject of an extensive assessment process. Accordingly, the nature of the development proposed has already largely been assessed and considered suitable for this site.

Notwithstanding, technical assessments have been prepared commensurate to this development in the context of the broader IPG Master Plan. For this reason, the 'significant likely impacts' requiring detailed assessment in this EIS are limited to the matters identified in the table below. Where impacts have largely been assessed, considered or anticipated as part of the masterplan, or are not considered to result in 'significant likely impacts' a standard assessment has been prepared to avoid unnecessary duplication.

Table 22 Assessment of Impacts

Detailed Assessment	Standard Assessment
Built Form and Design (including Design Quality)	Airport Safeguarding
Traffic, Transport and Accessibility	Hazards and Risk
Noise and Vibration Assessment	Flooding
Water Management	Bush Fire
Visual Impact	Land Contamination
Landscaping	Soils – Geotechnical Assessment
Ecologically Sustainable Development	Agricultural Land – Land Use Conflict
Air Quality and Odour	Aboriginal Cultural Heritage
Waste Management	Non-Aboriginal Heritage
	Infrastructure Requirements
	Biodiversity

Detailed Assessment	Standard Assessment
	Social Impact
	Planning Agreement / Development Contributions
	BCA
	Fire Safety Strategy

6.1 Built Form and Design

6.1.1 Built Form

Layout

The proposed site layout responds to the site's configuration as well as the operational requirements of the future tenant. The building's rectangular footprint and east-west orientation maximise the amount of employment floorspace within the site, whilst allowing for generous landscaped areas and hard standing for loading / unloading and trailer parking. A multi-deck car park is also proposed in the south of the site, which allows more of the site to be dedicated to landscaping and warehouse floorspace by minimising the footprint of parking area.

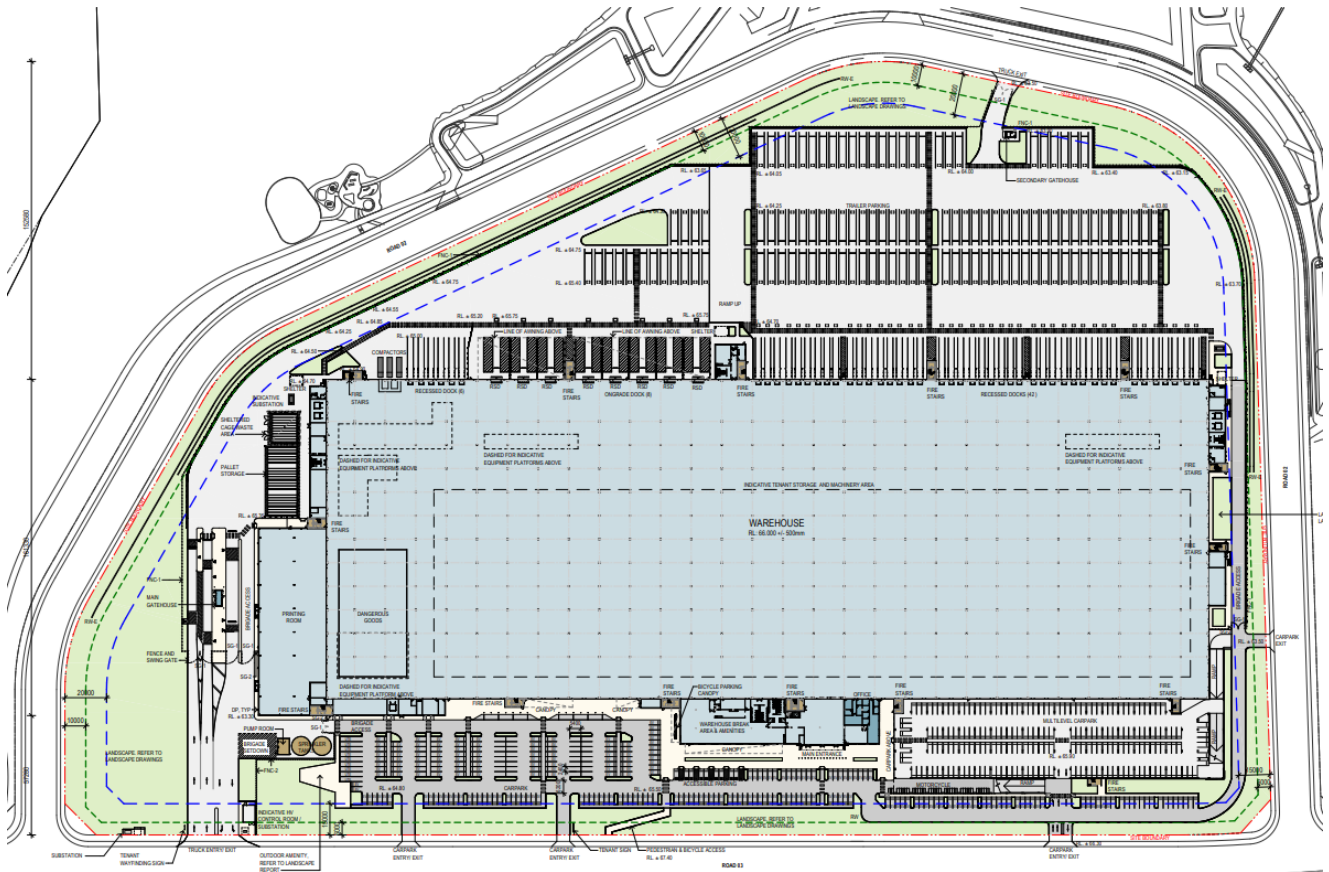
The proposed access arrangements, which include dedicated truck and car entrance and exit driveways along the site's southern frontage and a separate truck entry on the northern boundary, will support the segregation of large and small vehicles and enable delivery vehicles to safely and efficiently operate within the site. Delivery vehicles entering the site will access the loading docks via an internal access road. The at-grade and multi-deck parking, which are located immediately adjacent to the warehouse entrance, will facilitate safe and convenient access for staff and visitors.

Generous landscaped setbacks, which exceed the requirements set out in the WSA DCP and IPG Master Plan, are proposed along each frontage. The setbacks will support significant tree planting within the site, including along the western boundary. The tree planting will screen the building from views along Badgerys Creek Road.

Loading bays, trailer parking and other back-of-house space have also been located to minimise their visual impact. The loading bays and trailer parking will be located to the north of the warehouse where they will be screened from views to the south (including along Road 3) by the proposed built form.

The ancillary office and amenities building will be located along the southern elevation of the warehouse and provide additional activation along the Road 3 frontage. An outdoor communal area will be conveniently located adjacent to the office and amenities building entry. An additional landscaped outdoor amenity area incorporating outdoor seating is also proposed in the south-western part of the site, providing a high-quality space for staff and visitors to relax in.

Figure 19 Site Plan



Source: SBA, 2026

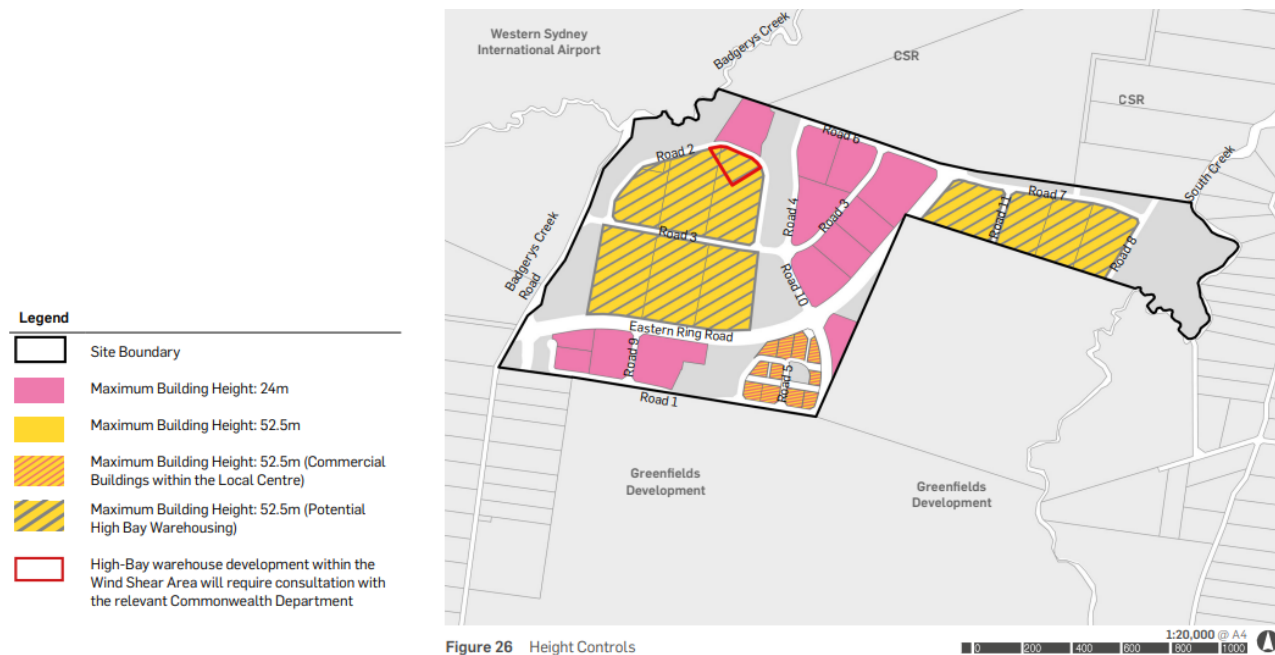
Bulk and Scale

The Western Sydney Precinct Plan provides the overarching framework to guide development of the Aerotropolis. Section 5.2 of the Precinct Plan states that the height of buildings is not to exceed the maximum for the land shown on Figure 12. Figure 12 shows a maximum building height of 52.5 metres for the site.

Additional controls relating to the bulk and scale of the proposed development are set out within the IPG masterplan. The additional controls can be varied subject to demonstrating a superior design outcome. Section 6.4 of the masterplan states that:

- The height of buildings is not to exceed the maximum for the land shown on Figure 26. An extract of Figure 26 is shown below, which identifies a maximum building height of 52.5m (Potential High Bay Warehousing) for the site. Development for the purpose of 'high bay warehousing' in areas mapped as 'Potential High Bay Warehousing' can achieve the maximum building height of 52.5m, subject to the design quality provisions in the masterplan.
- Any other warehouse development typologies (i.e. not comprising high-bay warehousing) must not exceed a height of 24 metres.

Figure 20 Extract of Figure 26 Height Controls of the IPG Master Plan



Source: IPG Masterplan, 2025

The proposed development has a maximum building height of 25.02 metres, which relates to the top of roof plant. Measured at the roof ridge level, the proposed building has a maximum height of 22.37 metres.

The nature of the proposed use as an automated distribution centre is fully consistent with the high-bay typology envisaged by the IPG masterplan. The proposed development will incorporate a range of robotics and large racking and conveying systems, necessitating floor to floor heights varying from approximately 5.12 to 8.9 metres. Accordingly, the proposed development is appropriately characterised as a high-bay warehouse and the maximum permitted height for the site is 52.5 metres. The proposed maximum building height (25.02m at top of plant; 22.72m at ridge level) is significantly less than the maximum permitted and the proposed development is therefore fully consistent with the relevant height controls set out within the IPG master plan and Precinct Plan.

The Precinct Plan does not include a maximum floor space ratio control for the site, providing flexibility to respond to the operator's individual requirements. Notwithstanding, section 6.5 of the Master Plan identifies the indicative floorspace distribution across the IPG estate. Whilst the proposed GFA exceeds the *indicative* amount allocated to Lots 208, 209 and 210, Section 6.5.2 of the Master Plan notes that:

"the indicative GFA is only a guide for future development with other parameters including height...and setbacks".

As described above, the building height is significantly less than the maximum permitted and the proposed development incorporates generous landscaped setbacks that significantly exceed the minimum requirements of the WSA DCP and Master Plan. A large landscaped area (equating to 15.6% of the site area) is proposed, which also contributes to the high amenity achieved within the site. The proposed building massing will not give rise to any additional adverse environmental impacts beyond those previously anticipated by the approved masterplan. The proposed development will not give rise to any overshadowing of other lots or Riparian corridors within the IPG estate at mid-winter.

The proposed massing will remain fully compatible with future industrial and commercial development envisaged elsewhere on the IPG estate, including the approved ALDI ADC directly to the south, as well as other contemporary industrial facilities elsewhere within the Aerotropolis.

As detailed below, a range of finishes and treatments are proposed along the building elevations, which will articulate the facades and provide visual interest within the site. Perimeter blocks, comprising facilities to support operational and worker needs, will also be integrated within the warehouse façade and provide modulation and a variety of height and depth. The variety of architectural treatments as well as the inclusion

of the perimeter blocks will break down the perceived bulk of the warehouse and avoid uninterrupted expanses along the surrounding streetscapes. Architectural screening will also be provided to the multi-deck car parking.

Overall, the proposed building massing is fully appropriate for the site. The proposed massing responds to the operational requirements of the operator, which are optimised over three storeys. Distributing functional floor area across multiple levels minimises the land area that would otherwise be required to support the proposed operation and allows the development potential of this highly accessible site to be fully realised.

Compliance with the indicative GFA thresholds across the wider master plan site will be the responsibility of IPG as the landowner. Notwithstanding, the Master plan (Section 6.5.2) states that the indicative GFA threshold for the total enterprise and industrial development zoned land *“can be exceeded subjected to the delivery of high-bay warehousing in locations where this typology is permissible under the masterplan”*. The proposed warehouse comprises a high-bay typology in a location identified as suitable within the masterplan.

Materiality

The proposed architectural treatment will help deliver an attractive and highly sustainable warehouse facility that will positively contribute to the evolving and future character of the Aerotropolis and IPG Precinct.

A range of materials will be used on the warehouse building including metal cladding (finished in a variety of different colours and tones) and painted concrete. Windows and glazing will be provided throughout the warehouse and staff amenity areas to maximise solar access. The entrance to the building will be distinguished by extensive glazing at ground floor level, with additional windows proposed along the length of the ancillary office and amenities building.

The variety of materials and colour finishes combined with the significant modulation provided within the massing of the building will add significant depth and visual interest in the site. Landscaping provided along the site boundary and frontages will further soften the buildings appearance. Business identification signage will further activate the building facades.

The multi-deck car park will be treated with aluminium fin screening, providing a high-quality and contemporary appearance consistent with the requirements of the WSA DCP.

Overall, the proposed building will incorporate a range of materials and treatments that will provide a cohesive and contemporary appearance. The materiality, colours and façade articulation provide visual relief and create depth and dimension to the warehouse development. The building will appear as a high-quality and modern industrial facility that positively contributes to the character of the IPG estate.

6.1.2 Design Quality

The IPG Master Plan includes a Design Quality Strategy (DQS) to ensure design quality is achieved across the precinct. The DQS, which applies to all on-lot development and associated landscaping across the whole IPG site, was developed in collaboration with DPHI and the Technical Assurance Panel as part of the Master Planning process, in accordance with objectives from the Government Architect NSW's (GANSW) 'Better Placed, Green Places and Connecting with Country Frameworks'.

The DQS is underpinned by a series of design quality principles which capture high-bay warehousing, including land use, urban built form and architecture. The DQS adopts a principle-based approach to design quality and a hierarchy approach to the verification and review of the design quality for future development across the Master Plan area. Each design principle contains associated design elements (including a design statement, objectives, and outcomes).

The DQS adopts a Quality Review Process based on location (either Enterprise and Industry or Commercial) and scale of the proposal. In accordance with the IPG Master Plan DQS, the proposed development is considered a 'medium-scale' project as the gross footprint exceeds 10,000 sqm and the site is not identified as a landmark site. Accordingly, a detailed peer review of the proposed development has been undertaken by an independent architect (Watson Young) to verify that the proposal complies with the DQS. The independent design review undertaken by Watson Young architects is enclosed in Appendix J and it confirms

that proposed development exhibits design quality and complies with the requirements of Section 14 – Design Quality Strategy of the IPG Master Plan.

As detailed within the SBA Design Report and summarised below, the proposed development has been informed by the Design Quality Principles of the IPG Master Plan, resulting in a high quality design outcome that maintains the integrity of the masterplan.

Table 23 Design Quality

Design Element	Design Quality Principles	Approach
Topography		
Cut and Fill	The future landform is to respond to the physical character of the land and minimises the cut and fill.	The proposed development responds to site topography through a level strategy that supports large-format logistics and warehousing operations while accommodating transport and servicing requirements.
Designed Levels	- The designed levels for development are to be suitable for a variety of enterprise and industry uses, especially the large footprint warehousing and logistics and transport needs. - The designed levels are to enable the controlled and safe conveyance of stormwater drainage and overland flows. - The designed levels are to enable major pedestrian and cycleway networks through the site, and extended connections to the surroundings. - The final levels are to respond to view lines towards landscape areas and riparian corridors where appropriate.	The pad levels have been determined by IPG via a separate CDC pathway and have been designed to facilitate high quality industrial development on the site.
Land Use		
Enterprise and Industry	- Encourage a mix of uses that respond to the objectives of the ENT zone through a flexible subdivision and super-lot strategy within the Master Plan. - Encourage employment uses and business-related services, which are consistent with the location close to the WSI Airport, through the delivering a range of lot sizes and flexible height provisions for emerging industries. - Improve amenity and services for the future working community.	The proposed development comprises a contemporary warehouse or distribution centre, which is permissible with consent on the land and fully consistent with the objectives for the ENT Enterprise zone as described in Section 4 above. The primary aim of the public amenity nodes is to provide an accessible food offering to users of the IPG estate. However, the provision of a public amenity node on the site is not viable given that the proposed development will occupy three lots; be operated by a single tenant; and include its own individual food offering for

Design Element	Design Quality Principles	Approach
	- Flexibility to the land for a variety of enterprise, industry and warehousing uses, including high bay warehouse, and the future evolution of the Aerotropolis. - Amenity nodes should support passive surveillance and provide visual amenity within the enterprise and industrial precincts in the Master Plan through accommodating active land uses such as cafés, restaurants and shops for the daily needs of the local working community.	staff and visitors. A similar food offering is also provided within the approved Aldi development to the south of the site, which will serve users of that development. Accordingly, there will be insufficient demand for a financially feasible public offering within the site. Other public amenity nodes will be provided elsewhere within the master plan site, including in Stage 4.
Connecting with Country		
Water landscape	- Development is to consider Aboriginal cultural elements such as waterways and landscape features, where relevant and appropriate - The architectural design is to consider the form and colours of the waterways and landscape, where relevant and appropriate	The proposed development incorporates large setbacks to allow for generous landscape buffers. These setbacks incorporate extensive perimeter vegetation and tree planting to reinforce the blue-green corridor network and celebrate the restored creek environments. Along Road 03, landscape features are integrated within the setback to highlight its role as a key creek-to-creek connection and strengthen its identity within the estate The multi-deck car park will be architecturally treated in a vertical fin screen that speaks to the pattern and rhythm of surrounding trees and grasses. By gently curving down to meet the ground, the screen seamlessly merges with the natural terrain, strengthening the connection with the surrounding landscape and natural curves of the creek.
Convergence of three clans	- Development is to acknowledge and represent Dharug, Dharawal and Gandangara groups by interpreting key narratives and stories on the site - Development must incorporate communal spaces that allow for gathering and interactions - Acknowledging the diversity of flora and fauna in the area and the role they play in sustaining life. The design of communal spaces is to acknowledge the diversity of flora	A variety of spaces for staff and visitors to gather and socialise are proposed, including internally within the building and outdoors. Two external communal areas will be provided, including a covered outdoor seating area adjacent to the main entrance and an additional amenity area located within a dedicated landscaped setting to the west of the car park.

Design Element	Design Quality Principles	Approach
	and fauna, where relevant and appropriate	
Community Driven	- The Landscape and Public Domain Design is to be developed and codesigned through the Designing with Country process. - The key themes including The Convergence of 3 Clans, Water Landscape and Community Driven, should help to drive the spatial and conceptual design.	Community-driven principles are achieved through the provision of multiple outdoor break and communal amenities across the site. he proposed landscaping approach responds to and reflects the water landscape including the shapes and forms of Wianamatta South Creek and Badgerys Creek As noted above, the fin screening to the car park references and draws inspiration from the surrounding terrain and landscape, reinforcing a connection between the built form and its natural context.
Language, Naming and Wayfinding	- Acknowledge the Importance of Indigenous Language and Naming and facilitate the integration of Language across the site, with consideration to the theme of the three clans, where appropriate and suitable. - Landscape design and place making to incorporate and interpret the Aboriginal language, knowledge and art as design elements. - Public open space within the Master Plan is to consider opportunities for learning as a way of designing with - Country (e.g., signage along riparian walking tracks, paving with co-designed motifs or engraving, etc.). - Enhance the cultural connection to place in development within the Master Plan by: - Incorporating local Aboriginal language to place names. - Incorporating the Aboriginal language, knowledge and art.	Wayfinding elements incorporating Aboriginal language, knowledge and art will be developed at the construction design stage.
Urban Form		
Building Orientation	Industrial buildings should complement the streetscape and enhance passive surveillance to the street and riparian corridors.	The development is designed to positively address the streetscape and enhance passive surveillance of surrounding streets and riparian corridors. The primary building entry faces Road 03, establishing

Design Element	Design Quality Principles	Approach
	- Industrial buildings should be orientated to ensure solar access to open space and riparian corridors are protected and maintained where practical. - The key creek-to-creek connection along prominent road corridors which link riparian corridors, particularly along Road 02 and Road 03 should be established. - Creating an active engagement along the street interface which supports a natural outdoor environment should be considered. - Maximising views to the internal streets and/or riparian corridors for community enjoyment should be utilised	a clear frontage and prominent address within the IPG estate. Building setbacks to the eastern and western boundaries improve visibility and access to the riparian corridors while ensuring these areas are protected from overshadowing. The proposed building orientation and massing will maintain solar access to the riparian corridors, with key creek-to-creek connections along Road 02 and Road 03 retained and unobstructed. Generous landscaping is proposed along all street frontages, with two dedicated outdoor amenity areas also to be provided in the site. Setbacks from Road 03 and the multi-level car park, as well as upper-level breakrooms enable clear and elevated views to internal streets and riparian corridors, strengthening the development's visual connection to the surrounding landscape.
Building Alignment	- Reinforce the street edge of key creek-to-creek road connections, particularly Road 02 and Road 03 to establish a street pattern. - The development should enhance the street presentation whilst ensuring design criteria are met. - Development should provide generous area of landscaping along key creek-to-creek road connections.	The development reinforces the street edge along key creek-to-creek road connections, particularly Road 02 and Road 03, through a unified, single-building form that establishes a clear and legible street pattern. The consolidated facility avoids fragmentation, presenting as a cohesive development that strengthens the urban structure of the precinct. Street presentation is enhanced through carefully considered finishes and building articulation, delivering a balanced architectural composition that provides visual interest. A generous landscaped area incorporating significant tree planting is proposed within the site, including along its boundaries and adjacent to the precinct's key creek-to-creek connections.
Access	- Pedestrian pathways within a lot should be utilised to ensure safe access to and from parking areas into the warehouse building or ancillary Office. - Pedestrian pathways should be delivered on the shortest route possible, where achievable.	Dedicated pedestrian and bicycle access is provided from the street, with traffic-calming measures ensuring safe movement into the site. Within the car park, clearly defined pedestrian footpaths are provided throughout, supported by additional traffic-calming measures to safely separate vehicles and pedestrians. Pedestrian pathways are designed to

Design Element	Design Quality Principles	Approach
		follow the shortest practical routes, providing a direct and legible connection to the main office entry.
Potential for Through Site Links	- The emergence of compact commercial typologies within the enterprise precinct must consider the opportunity for through-site links to enhance pedestrian permeability. - Opportunities for through-site links must ensure security and site operations for adjoining warehouse building are not compromised.	The proposed development comprises an automated distribution centre (warehouse or distribution centre). Accordingly, this provision does not apply.
Architecture		
Building Composition	- Clear definition of hierarchies for planning of public, private and semi-public domain is to be considered. - Ancillary office should be highly visible from the street, support passive surveillance to the street and contribute to the streetscape character. - Buildings should contribute to wayfinding and avoid overtly reliant on signage to navigate within the estate. ▢ Developments within the Master Plan are to be designed in accordance with the minimum building setbacks in Figure 129	A clear spatial hierarchy is achieved through the placement of the main entry and ancillary office to the Road 03 frontage, establishing this interface as the primary public address. The office component is visually distinct from the warehouse, reinforcing visibility, supporting passive surveillance, and contributing positively to the streetscape. The development is designed in accordance with the minimum building setback requirements identified in the Master Plan.
Massing & Proportions	- Perceived bulk of industrial buildings fronting the street should be broken down to avoid long façades. - Where the enterprise and industry buildings adjoin the Riparian Corridor but not separated by a road reserve, the building scale and interfaces fronting the riparian should promote safe travel and pedestrian movement. - The development should have dedicated footpaths along the interface of the riparian corridor, where possible.	The warehouse façade is articulated through modulation and a variety of materials and finishes forms to minimise perceived bulk and create visual interest along the primary street frontages. The proposed approach contributes to a refined streetscape presentation that will positively contribute to the emerging character of the IPG estate. The site does not bound or share a direct interface with a Riparian corridor.
Public Domain & Building Interfaces	Generally, the subdivided lots are surrounded by 4 main bounding sides. In the context of the Master Plan, a typical lot can be defined by a	The site is bounded by Road 2 and Road 3. The proposed warehouse will address the primary frontage along Road 3 by incorporating a range of materials, finishes and modulation along the southern

Design Element	Design Quality Principles	Approach
	combination of the following public interfaces: – Eastern Ring Road – Bradfield Metro Link Road – Creek-to-Creek Connections (Road 2 and 3) – Other Internal Roads, e.g. Collector Road and Local Road – Riparian Corridors The proposed industrial buildings occupying the lots in the Enterprise and Industry zone must be articulated to address these interfaces. Some of the acceptable design solutions relate to the siting of ancillary office, loading frontages, non-active frontages design, communal outdoor areas, and the use of materials and colours, as presented in the table across.	elevation of the building. The ancillary office and amenities building will also address Road 3 to the south. Loading bays and back of house facilities have been located to the north of the building, where they will be screened from views along Road 3 by the built form. The eastern, western and northern elevations of the building will also incorporate a range of finishes to provide visual interest from views of the site from Road 2.
Siting of Ancillary Office	▪ The ancillary office is more than just building with amenity serving the warehouses. It also functions as the main gathering point for workers and visitors alike, with architectural design that emphasizes both functionality and aesthetic appeal. ▪ Therefore, the placement of the ancillary office is critical as a focal point and is useful to mark pedestrian/ vehicular entries and reinforce corner frontages. ▪ The ancillary office can accommodate functions such as; – Meeting and Office workspace – Wet areas for both warehouse and office workers – End of trip facility – Lobby space – Lunchroom area ▪ If the building has an Ancillary Office, the design must meet the following requirement: ○ The siting of the Ancillary Office is subject to the following order of importance;	The proposed development provides an ancillary office and amenities building that functions as the primary public interface and central amenity space for workers and visitors. The building accommodates office and meeting spaces, wet areas for warehouse and office staff, end-of-trip facilities, lobby space, and a lunchroom. The ancillary office and amenities building is strategically sited to define pedestrian and vehicular entry points and reinforce the primary street frontage, consistent with the Master Plan hierarchy requirement. Its architectural form, materials, and finishes are deliberately differentiated from the warehouse to mediate scale, and express a finer-grained character.

Design Element	Design Quality Principles	Approach
	- Riparian Corridors where practical, Creek-to-Creek Connection, Internal Roads - o The use of colours, materials and texture are critical to: - Remediate the scales between the warehouse and Ancillary Office and create a cohesive design. - Express the finer grained character of the Ancillary Office component.	
Loading Frontages	▪ The loading/ unloading interfaces are generally lined with roller doors for trucks to load/ offload goods. ▪ In many circumstances, a dock office will also be provided. Workers use the dock office to oversee the activities on the hardstand. ▪ Some large format/ high bay may have 2x loading sides, serving incoming and outgoing deliveries. ▪ The associated activities help to establish passive surveillance along the immediate interface. ▪ The loading areas must meet the following requirements - Weather protection over the loading/ unloading activities must be provided to ensure an adequate working condition. - Apply change in materials and colours that are durable to express different activities and zone	The development provides weather-protection awnings to at-grade docks to support safe and efficient operations. Trucker lounges are incorporated as supporting amenities, and gatehouses are provided to manage access and control movement within the hardstand areas. Robust concrete wall finishes are proposed at the base of the building around the loading docks on the northern elevation.
Non-active Frontage with Interplay of Colours, Materials & Finishes	▪ Depending on the nature of the logistics operation, there may be non-active façades. Frontages with no loading activities parking or Ancillary Office are generally considered as Non-Active Façades. ▪ However, there are opportunities treat the façade to create visual interest and enrich the interfaces. These include but not limited to;	The building design has been carefully considered on all elevations, including areas without active uses, to ensure a consistent and visually engaging outcome. Articulated forms, varied materials, and controlled colour application are used to provide visual interest across the full extent of the facility. Landscape planting is also incorporated within all of the building setbacks to soften the appearance of the built form.

Design Element	Design Quality Principles	Approach
	- Use of different materials, finishes and colours to modulate forms and mitigate building heights - Landscape elements such as trees, shrubs etc to soften built forms.	
On-Lot Landscape Strategies within Landscape Setback	▪ All four boundary interfaces of a lot occupied for industrial use must have landscape elements within the landscape setback stipulated in the Design Quality Strategy and DCP. The landscape elements may include the followings; - Rain garden - Parking with planter beds - Tree canopies - Low vegetations - Shade for electrical charging car bay - Walkways	Landscape elements are provided along all site boundaries. Generous tree planting, shading, and landscaped areas are integrated with parking and pedestrian movement across the site. Canopy coverage and shading have been carefully considered to enhance amenity and soften the proposed built form.
Communal Outdoor Areas	▪ In a typical industrial setting, a communal outdoor space is usually provided as an informal breakout space for both warehouse and ancillary office workers. If the ancillary office is provided, the communal outdoor space is usually directly connected to the Ancillary Office component. ▪ The design of the communal outdoor areas must adhere to the following: - Integrated with the design of the ancillary office. - Provision of weather protection such as awnings, pergolas or louvers. - Breakdown of hardscape and landscape for different activities. - Have views to landscape where practical.	Two communal outdoor areas are proposed within the site. This includes a covered outdoor seating area directly adjacent to the ancillary office and amenities building as well as an additional outdoor seating area set within a landscaped setting in the south west corner of the site.
Materials & Colours	▪ Materials used for façade should be robust, fit for purpose, easy to maintain and consistent with the functional requirements. ▪ If the development consists of an ancillary office, the design of the	Façade materials have been carefully selected to be robust, durable, and fit for purpose, ensuring long-term performance and ease of maintenance in an industrial setting. The base of the warehouse around the loading docks will be defined by robust

Design Element	Design Quality Principles	Approach
	ancillary offices should be expressed as a finer grained component using materials with varying colours and texture and provide engagement with the street.	concrete walls. The upper levels of the warehouse will be characterised by metal cladding in a range of colours. The ancillary office and amenities building is expressed with the use of contrasting materials, colours, and textures, allowing it to read clearly as the primary entry and office location. Finishes are proportioned relative to the scale of the warehouse and office to achieve a balanced and cohesive overall composition and enhance street engagement. In addition, the car park incorporates architectural screening that provide visual interest while compositionally complementing the overall building design

6.2 Traffic, Transport and Accessibility

A Traffic Impact Assessment (TIA) has been prepared by Ason Group (Appendix M) in response to the requirements contained in the SEARs and the relevant matters related to Traffic and Transport.

The report has been assessed against the benchmark assessments established in the IPG Master Plan. That is the total traffic volumes which were considered appropriate for the IPG land by the TAP as part of the approved Master Plan have established the framework for which the TIA has been assessed. This provides a significant benefit to the consideration of traffic impacts for this development, as they have already considered at an estate level, rather than just a project specific level, providing overall confidence in the assessment.

The preparation of this TIA has referenced and considered the following key planning documents concerning the broader site including the IPG Masterplan site:

- *Ason Group, Transport Management & Accessibility Plan – IPG Master Plan, P1492r06v7, dated 21 June 2024 (Master Plan TMAP).*
- *Ason Group, Transport Impact Statement – Site Access Roundabout DA, P1492Br01v1, dated 23 August 2024 (Roundabout TIS).*
- *Ason Group, Transport Assessment – ALDI Sydney Automated Distribution Centre, P1492Ar01v09, dated 19 December 2025*

6.2.1 Existing Environment

The road network surrounding the Proposal is summarised below:

- Badgerys Creek Road (**BCR**) is a regional collector road and provides a north-south connection between Elizabeth Drive and The Northern Road. BCR carries 1 lane in each direction. No on-street parking is permitted.
- Elizabeth Drive is an arterial road traversing in the east-west direction. It has 1 lane in each direction, with localised widening for a dedicated turn lane at intersection with BCR.
- The Northern Road is an arterial road traversing in the north-south direction. It has 2 lanes in each direction. No stopping is permitted.

There are limited public transport services currently available within vicinity of the ADC development currently, however the future Sydney Metro Western Sydney Airport Line is currently under construction and will be providing six metro stations between St Marys and Aerotropolis station with the following stations of relevance to the ADC:

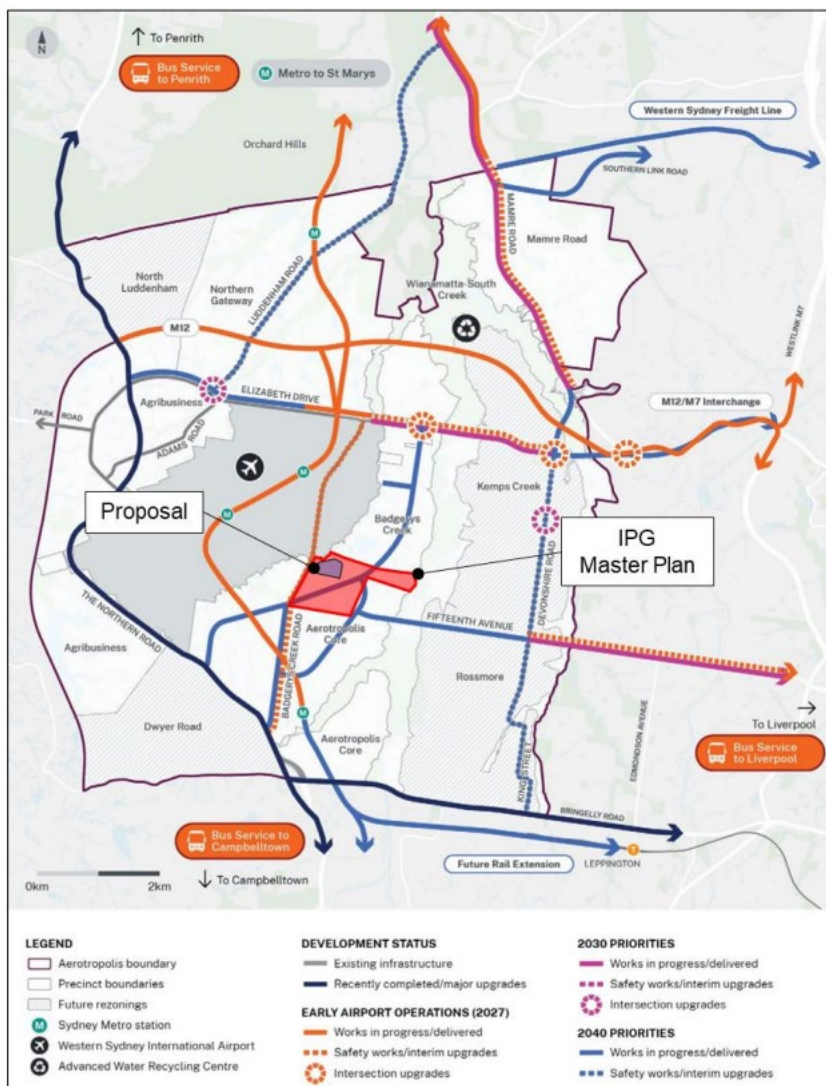
- Bradfield Metro Station will be located some 2km south of the site.
- Airport Business Park Station will be located some 2-3km north of the site.

The closest bus stop to the site which serves the 801 bus route to Liverpool is located over 3.5km from the site. However, there are 5 new permanent bus routes that will connect Penrith, Mount Druitt, Liverpool and Campbelltown to the WSI Airport along Badgerys Creek Road will commence in July 2026.

Currently, no formalised pedestrian and cycling infrastructure is provided within vicinity of the proposal, with only road shoulders on either side of BCR.

To provide sufficient transport infrastructure for the planned growth across Western Sydney (in addition to the infrastructure improvements already completed or being undertaken with reference to the Western Sydney Employment Area (**WSEA**), several key infrastructure improvements are proposed or in progress, including those within the Aerotropolis Section Plan 2025. With specific reference to the intended timing of this land coming online, described below.

Figure 21 Aerotropolis Transport Projects



Source: Ason Group, 2026

As described above, key road infrastructure upgrades which are relevant to the traffic accessing the **proposed ADC are noted below:**

- **Eastern Ring Road:** A future north-south arterial road with a 60m wide reserve and two travel lanes in each direction, providing connection between Elizabeth Drive to the north (via the existing Martin Road / Elizabeth Drive intersection), and The Northern Road to the south. It is noted that the project is currently in planning. Indicative timing has been forecast for construction to be completed by 2040 as a future priority as part of the Aerotropolis Sector Plan (**ASP**).
- **Badgerys Creek Road:** An existing collector road currently providing connection between Elizabeth Drive and The Northern Road.
 - With reference to the WSA long-term layout, and the Aerotropolis Plan, the northern section of the Badgerys Creek Road (traversing through the future Stage 2 WSA) will be disconnected, whilst the section south of the future signalised Badgerys Creek Road / Eastern Ring Road intersection would be subject to upgrades to a 40m wide sub-arterial road.
 - Recent public consultation noted *“Construction of the second runway will see the closure of Badgerys Creek Road from the Western Sydney International Airport boundary to Elizabeth Drive”*.
 - During previous consultation with Western Sydney Airport Corporation as part of the IPG Master Plan, it was clear the intention was to:
 - Close that section (northern section) of BCR as soon as practicable, and
 - Not invest any funding in (unnecessary) upgrades prior to closure.
 - The upgrade of BCR more broadly is a matter to be funded through relevant contributions. TfNSW is currently undertaking further design development of the future BCR and ERR corridors, including the BCR / ERR intersection. Finalisation of those designs may result in some localised modifications from that currently assumed. The BCR / ERR intersection is expected to ultimately be delivered by TfNSW and likely to be offset from the current BCR alignment. As such, there is a risk that any interim works in that area may need to be modified to suit the ultimate design when finalised.
 - Therefore, Ason are of the view that it is premature to build ‘ultimate’ active transport connections within BCR until that design work is finalised. Delivery of works within BCR will be funded through a State Infrastructure Contributions (SIC) mechanisms and is expected to be the responsibility of TfNSW or Infrastructure NSW, via the new Infrastructure Coordinator General office. Deferral of works within BCR is consistent with the Bradfield City Centre masterplan which also committed to works within its boundary).
 - A development application (DA-424/2024) for the construction of the single-lane roundabout between Badgerys Creek Road and Road 03 was approved by Liverpool City Council in March 2026.
- **Bradfield Metro Link Road:** A future primary arterial road with a 45m wide reserve providing loop connection between Badgerys Creek Road, Eastern Ring Road and Fifteenth Ave. It is proposed that one travel lane in each direction and one dedicated bus lane in each direction will be provided. It is understood that the Bradfield Metro Link Road is intended to facilitate primary movement for buses and local vehicle access, however, TfNSW have indicated that they do not intend to restrict general vehicles and heavy vehicle access.
- **The M12 Motorway:** Currently estimated to cost \$2.04 billion, the M12 will provide a 16 kilometre east-west connection between the M7 and The Northern Road (north of the WSA) and provides the primary connection between the WSA and the regional road network. It opened in March 2026.
- **The Northern Road:** The Federal and NSW governments have recently completed upgrading The Northern Road as a part of the \$4.1 billion WSIP. The 36-kilometre upgrade of The Northern Road between the M4 in the north and Narellan includes access to the new WSA at Badgerys Creek and the growth areas of southwest and Western Sydney. The upgrade has been delivered in six stages and construction started in 2016 with the full upgrade completed in 2021, providing improved safety, increased road capacity and reducing travel times and congestion in the growth area.

It is clear the arterial road network in the vicinity of the ADC and broader IPG site, is undergoing, and will continue to undergo, significant upgrades to accommodate the growth expected for the WPC. Impacts discussed below have been considered in the context of this change, to ensure that point in time assessments provide assurance around the level of assessment provided.

6.2.2 Potential Cumulative Impacts

Traffic Generation (Construction)

A detailed construction traffic management plan (**CTMP**) will be provided post consent in response to a standard condition of consent. This will ensure that the contractor proposing to construct the ADC, can align the delivery programme for the build with traffic related considerations. For the purposes of this assessment however, the following general principles for managing construction traffic have been assumed and provide an understanding of the likely traffic impacts during the construction period. It is expected that the final CTMP will address in detail the following:

- Assessment of cumulative impacts associated with other construction activities.
- Assessment of road safety at key intersections and locations to be subject to heavy vehicle construction traffic movements and high pedestrian activity.
- Details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process.
- Anticipated peak hour and daily construction vehicle movements to and from the site.
- On-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle.
- Details of temporary cycling and pedestrian access during construction

The approved traffic generation thresholds for the IPG Master Plan (862 vehicles per hour), less the operational volumes of the ALDI ADC form the indicative maximum permitted construction traffic volumes until such time that a detailed construction program is prepared by the appointed contractor. This will include detailed construction staging, worker numbers and heavy vehicle volumes. In this regard, the maximum construction traffic volumes permitted at this stage are as follows:

- AM peak: 724 movements per hour (movements, in and out combined)
- PM peak: 564 movements per hour (movements, in and out combined).

These construction volumes set a benchmark threshold for the future contractor to be appointed for construction of the proposed ADC. These peak hour thresholds far exceed those that would reasonably be required to as part of all construction stages associated with the proposal.

Construction works would be undertaken during standard construction-working hours, which are likely to be as follows.

- Monday to Friday: 7:00 AM to 6:00 PM
- Saturday: 8:00 AM to 1:00 PM
- Sunday and Public holidays: No planned work

Any work to be undertaken outside of the standard construction hours will be required to obtain an Out of Hours (**OOH**) approval. Any such works would necessarily be undertaken in accordance with the appropriate OOH protocols and approval processes.

The primary intended haulage route to and from the site would occur along Badgerys Creek Road via The Northern Road to the south. A copy of the approved routes will be distributed by the Contractor as part of the Driver Code of Conduct before their arrival to site.

Light vehicle traffic generation would be generally associated with staff movements to and from the Site. Staff would be comprised of project managers, various trades and general construction personnel. Light

vehicle construction trips are expected to arrive in the morning and depart in the evening. Noting the typical construction work hours, the peak periods are likely to occur outside of traditional road network peak periods.

Heavy vehicle movements generated by the construction of the Site will be estimated having consideration of the likely requirements for construction plant, equipment, and haulage as part of the detailed CTMP. It is emphasised that a detailed CTMP will be provided in response to a suitable Condition of Consent (**CoC**) for the Proposal.

Parking (Operational – Heavy Vehicle)

The Phase 2 DCP which applies to the site and ADC states that the following regarding off-street loading and unloading facilities:

The number and size of loading bays will be determined by the consent authority having regard to the:

- Intended use of the premises
- Frequency of deliveries/collections
- Size and bulk of goods to be delivered/collected
- Size of vehicles to be used
- Likely impacts on traffic safety and efficiency on adjoining roads.

As no specific rate is stipulated, regard has been had to the Liverpool Development Control Plan 2008 (**LDCP**). That said, given tenant requirements are known the proposal provides for a mixture of loading facilities as follows:

- Loading docks: 56 comprising 48 recessed docks and 8 at-grade roller shutter doors (RSDs)
- Trailer parking: 120 spaces

The future tenants operational information indicate an estimated heavy vehicle site peak hour trip generation finds that approx. 25 heavy vehicles (predominantly articulated vehicles) would enter the site during any given peak hour. The provision of 56 loading docks and 120 heavy vehicle parking bays would readily accommodate this peak demand. The proposed development has been designed to incorporate an A-double exclusion zone to future proof any future demands for A-double and B-double vehicle movements.

Parking (Operational – Passenger)

The site is located within the Western Sydney Aerotropolis and is therefore subject to the controls of the Western Sydney Aerotropolis DCP – Phase 2 (**Phase 2 DCP**). Car parking rates for warehouses and ancillary offices are shown below for the Enterprise and Light Industry area.

Table 24 DCP Parking Rates

Land use	Yield (m ²)	Min. Parking Rate	Min. Parking Requirement	Proposed
Warehouse	192,794	1 space per 300m ² GFA	643	888
Ancillary office	3,035	1 space per 40m ² GFA	76	
Total	195,829	–	719	

The proposed provision of 888 parking spaces meets and exceeds the minimum Phase 2 DCP requirements and is considered appropriate for the following reasons:

- It would accommodate a range of parking demands including office staff, shift workers and visitors across the day and night. This specifically includes staff shift changeover periods given the 24/7 operational requirements.
- It affords flexibility to accommodate any such major events and meetings, fluctuations in visitor demand, small deliveries and associated daily and seasonal fluctuations in parking demand.
- The spread of parking across the site between the multi-deck car park and outdoor car park (including drop-off/ pick-up and ute/ long wheel base parking) reduces opportunities for conflicts during staff changeover periods and visitor/ small delivery movements across the day.

For developments within Enterprise and Light Industry land use area, the DCP also triggers the following requirements:

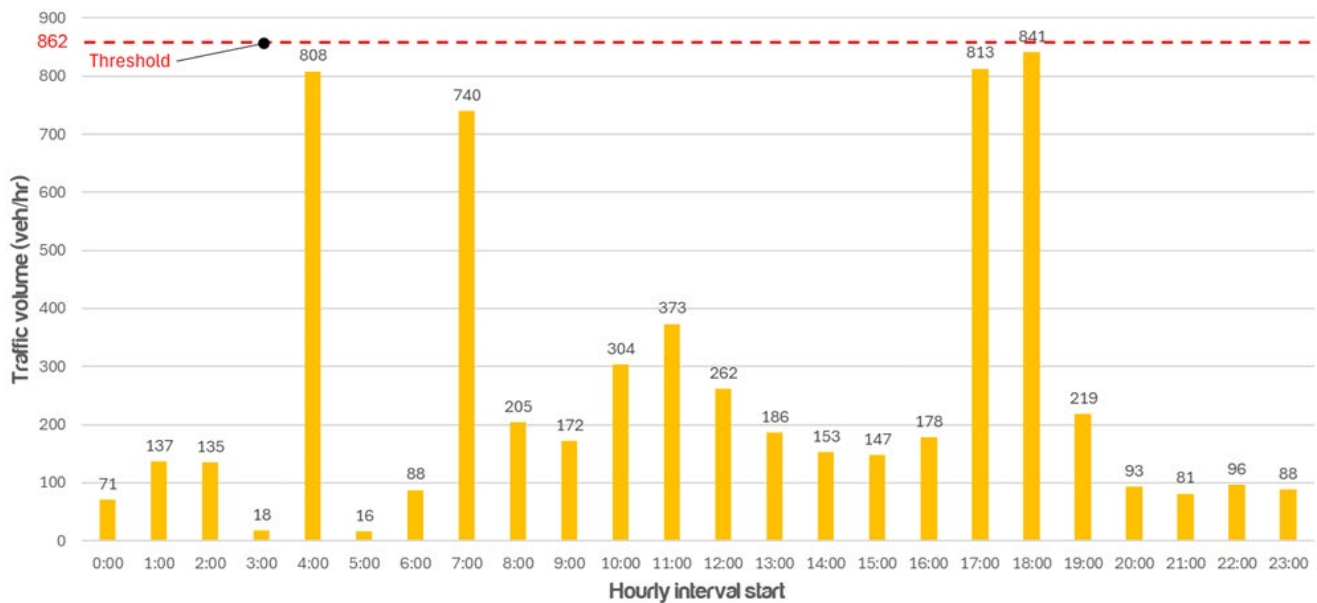
- Accessible parking be provided in accordance with Access to Premises Standards, Building Code of Australia (BCA), which requires 1 accessible space for every 100 carparking spaces or part thereof for storage and process-type buildings. For the ADC, this generates a need for 9 spaces which will be provided.
- The DCP provides the following bicycle parking provision requirements for developments within Enterprise and Light Industry land use area. Specifically, the DCP triggers the need for 199 spaces in total. The proposed development seeks to provide 40 bicycle spaces. This is considered acceptable as:
 - Bicycle parking utilisation rates would be reviewed as part of the monitoring process to identify any shortfalls in the provision of bicycle parking. As the site and surrounding area develops further, this would be reviewed as part of implementation measures of the Green Travel Plan (**GTP**) to ensure that sufficient bicycle parking is provided.
 - Operational information provided by the future tenant indicate that up to 686 headcount would be on-site at any one time. Based on a provision of 40 spaces, this would be equivalent to approximately six per cent of the estimated headcount which is considered appropriate given current conditions. By comparison, active mode share targets detailed in Section 9.4.1 of the TIA consistent with the Aerotropolis Precinct Plan would estimate that up to two per cent of staff would travel by bicycle, which is reflective of the existing rural nature and limited separated / off-street bike routes
- Similarly, the DCP provides the following EOTF provision requirements for developments within Enterprise and Light Industry land use area. The requirements for both the ancillary office and warehouse space will trigger 2 shower cubicles with ancillary change rooms to be provided. 1 male and 1 female change room will be provided which complies with the DCP requirement. The demand for end of trip facilities will be regularly monitored as part of the ongoing implementation of the Green Travel Plan.

Traffic Generation

Traffic generation thresholds were previously identified in the approved IPG Master Plan TMAP which were based on the maximum supportable development yields and thereby traffic volumes on the external road network. A comparison of the total traffic generated by the approved ALDI ADC and the proposed development against the approved traffic volumes as prescribed in the IPG Master Plan TMAP is provided.

Traffic generation thresholds were identified under the interim and ultimate assessment scenarios of the IPG Master Plan for Stages 1-6 for warehouse and industrial land uses. The threshold was identified to be 862 vehicle movements per hour during both the weekday AM and PM peak hours. The cumulative traffic generated by the approved ALDI ADC and proposed development is shown in Figure 22.

Figure 22 Cumulative traffic generation of ALDI ADC and proposed development



Source: Ason Group, 2026

As shown, the cumulative traffic generation remains within the approved thresholds and therefore supported for the Stage 1 ALDI ADC and Stage 2 proposed ADC assessment scenarios. This cumulative assessment shows that these two tenancies – with the identified operational traffic volumes – will operate within the previously modelled and approved peak hour thresholds and not result in any additional traffic related impacts than those already approved.

A further review of the estimated traffic generation has been completed by adjusting vehicle volumes in accordance with passenger car equivalent (**PCE**) factors to deliver a more accurate and like-for-like comparison between the approved IPG Master Plan threshold and those generated by the proposed development and ALDI ADC. The PCE factors have been adopted for heavy vehicle movement to ensure a robust and accurate assessment between the approved IPG Master Plan volumes, the proposed development and ALDI ADC. A PCE of 2.9 has been applied which allows a conservative benchmark for the proposed development heavy vehicle movements noting that articulated vehicles represent most heavy vehicle movements for both ADCs.

The light and heavy vehicles splits have been applied to the approved thresholds, in accordance with *Guide to Transport Impact Assessment, 2024 (GTIA)* rates, which is line with the approved methodology undertaken under the ALDI ADC transport assessment:

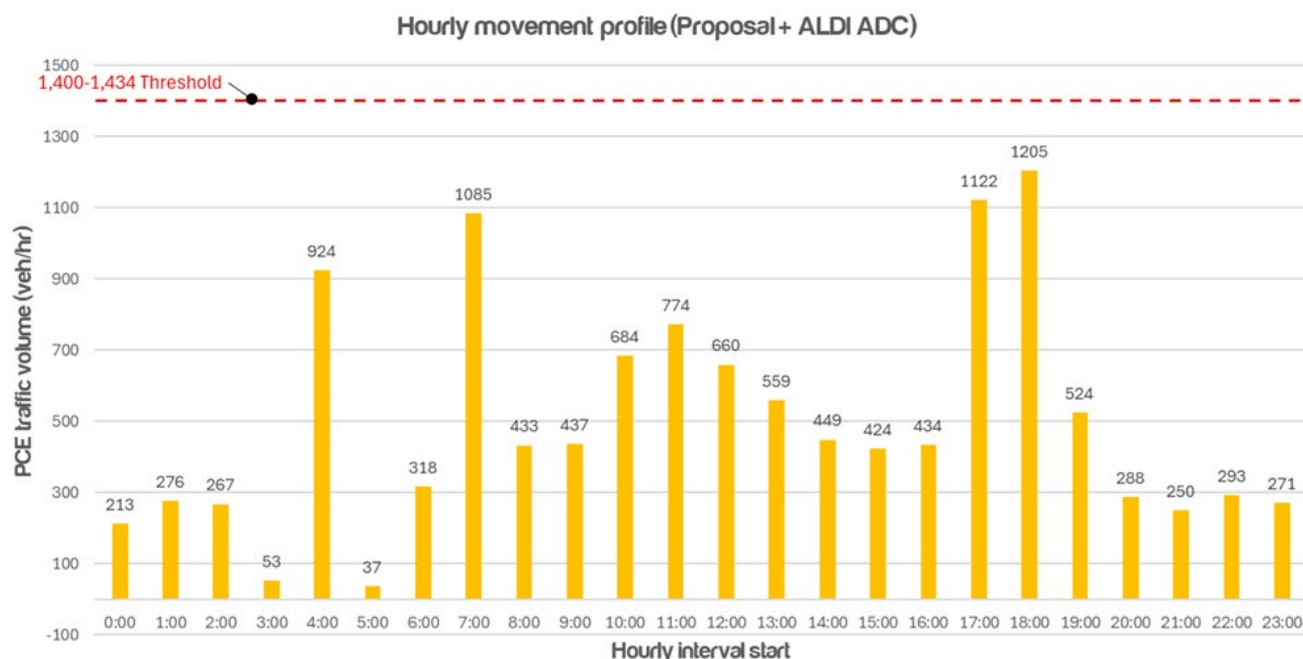
- AM peak: 68% light vehicles and 32% heavy vehicles
- PM peak: 70% light vehicles and 30% heavy vehicles.

The following PCE-adjusted thresholds therefore apply:

- AM peak: 1,434 PCE movements per hour
- PM peak: 1,400 PCE movements per hour

On this basis, the adjusted hourly traffic generation are shown in Figure 23

Figure 23 PCE-adjusted traffic generation profile (proposal + ALDI ADC ultimate operations)



Source: Ason Group, 2026

The PCE-adjusted movements are further broken down and compared in Table 25.

Table 25 PCE comparison (proposal + ALDI ADC ultimate operations)

Period	Light vehicles	Heavy vehicles	Combined PCE	IPG Master Plan threshold	Change
AM peak	588 vph	171 vph	1,085 vph	1,434 vph	-349 vph
PM peak	793 vph	135 vph	1,183 vph	1,400 vph	-218 vph

The PCE assessment demonstrates that the proposed traffic generation falls well within the approved thresholds with capacity remaining for 349 and 218 vehicle trips in the weekday AM and PM peak hours respectively. It is emphasised that this assessment takes into consideration 'peak season' operations associated with the approved ALDI ADC which could occur over a four-week period in late November and December. Under standard operational periods across the remainder of the year, the traffic generation of the proposed development and ALDI ADC would remain noticeably below the approved IPG Master Plan thresholds. Therefore, the proposed development is supportable on traffic generation grounds and no additional modelling is deemed warranted.

6.3 Noise and Vibration Assessment

A Noise and Vibration Impact Assessment (**NVIA**) has been prepared by EMM (Appendix T) to assess the noise and vibration impacts of the proposed development during both its construction and operational phases. The assessment has been informed by the relevant guidelines and Australian Standards as well as the Noise Planning Assessment (**NPA**) that was previously prepared to support the approved IPG master plan.

6.3.1 Existing Environment

The site and the surrounding area within the Aerotropolis is currently transitioning from predominately rural residential and agricultural properties to a mix of uses include enterprise and industrial development that will support the operation of the new WSI airport. Existing isolated rural-receivers to the south, west and north along Badgerys Creek Road are located within the Enterprise zone and will transition to industrial, commercial or retail land uses in the future. Land to the south east of the IPG master plan site is anticipated to be

redeveloped for a mix of uses, potentially including residential development. Existing residential areas to the east (approximately 1.7km from the site) are also expected to be intensified.

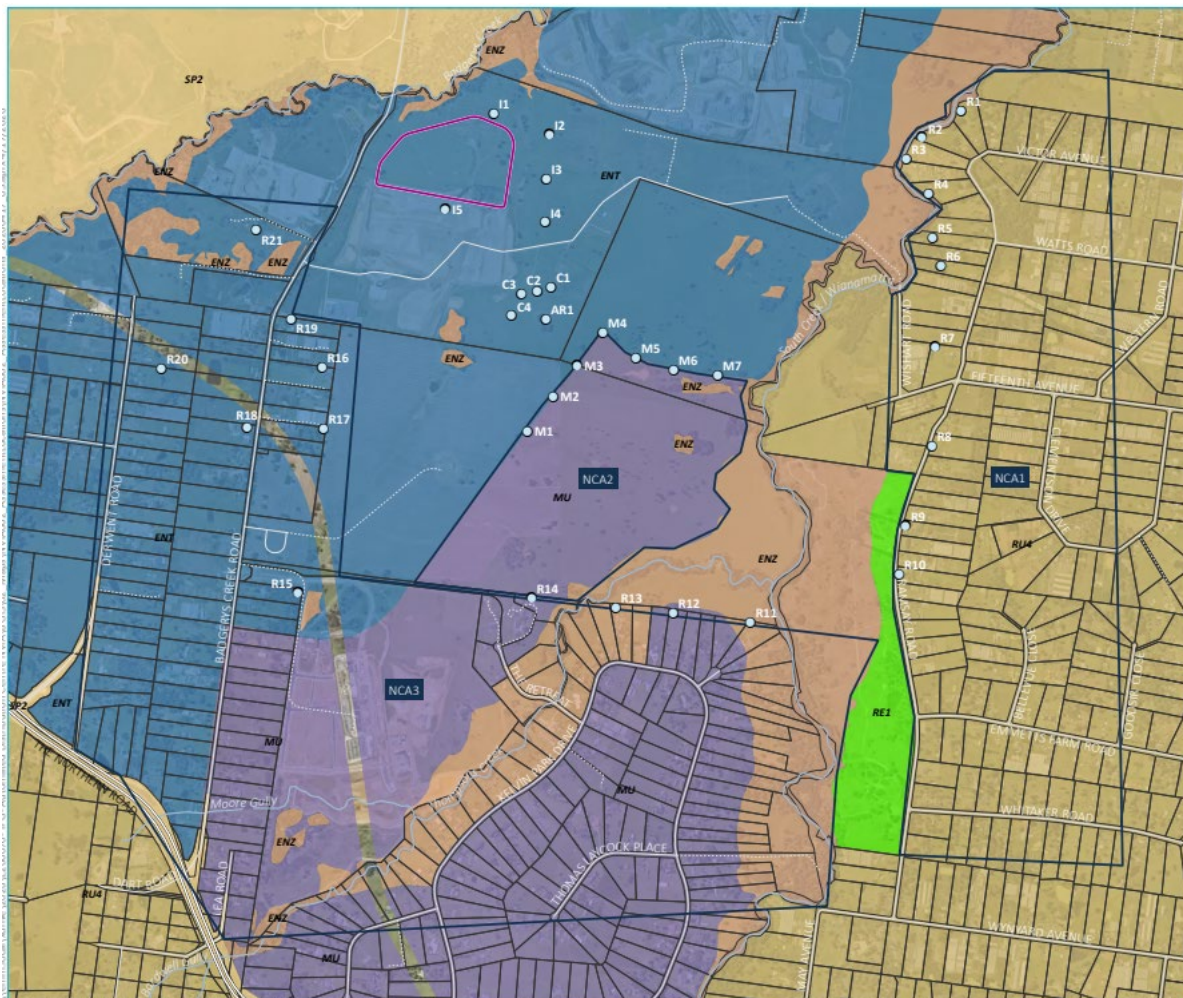
Accordingly, the NVIA anticipates that future residential development to the east and south-east of the site will consider the current zoning, permitted land use, hours of operation and expected noise exposure from developments such as that now proposed and incorporate a level of noise control to maintain a satisfactory level of internal noise amenity taking account of potential noise intrusion road traffic and industrial/commercial land use. Noise lot allowances contained in the approved IPG Master Plan considered these sensitive receivers and adjacent future land uses in this context.

Noise measurements of the existing noise environment were undertaken for the IPG Master Plan NPA and have been considered in the NVIA. The NVIA considers impacts of the proposed development to a range of receivers located within three noise catchment areas (**NCA**):

- **NCA1 – East – Residential:** Existing rural primary production properties, which have been earmarked for medium density residential expansion at Rossmore and Kemps Creek
- **NCA2 – South-east – Mixed-use future development:** Comprising buildings up to 52.5m in height
- **NCA3 – South / South-west / West / North – Residential / Enterprise:** Existing isolated rural residential properties within the Enterprise Zone that will transition to industrial, commercial and other non-residential uses in the future.

The location of the NCAs in relation to the site are shown in Figure 22.

Figure 24 Sensitive receivers location



Source: EMM, 2026

Project Noise Trigger Levels (PNTLs) have been identified for each of the NCAs. A commercial noise criteria is applied to NCA3, consistent with the approach adopted in the approved IPG Master Plan and Aldi SSDA. This approach is also fully consistent with advice received from the Environmental Protection Agency as part of the project-specific SEARs, which stated:

“The EPA understands that the Master Plan includes an approach for developments that do not require an EPL to assess existing residences using commercial noise criteria. Should the Proposal require an ELC, the EPA advises noise from a licensed premises is to be assessed according to the EPA’s Noise Policy for Industry (NPfi) (EPA, 2017)”.

The proposed development does not require an Environmental Protection Licence. Accordingly, the assessment approach is appropriate.

6.3.2 Potential Impacts

The potential construction noise, construction vibration, and operational noise impacts arising from the proposed development are summarised below.

Construction Noise

Three stages of construction noise were assessed: civil works; warehouse construction; and building services and operational fit-out. The assessment considered construction noise levels at the identified receivers within NCA1 and NCA3. Predictions were not undertaken for NCA2 as the receivers within this catchment are unlikely to be developed during construction of the proposed development.

The predicted noise modelling indicates that there is the potential for noise from site construction activity to exceed standard hours noise management levels (NMLs) by 1–5 dB during civil works at up to three receivers. However, the construction noise assessment is conservative and presents an absolute worst-case scenario, which assumes that all construction equipment identified in the NVIA is operating concurrently and for a full 15 minute period. This is unlikely to occur in practice.

The affected receivers are residual residences within the Aerotropolis and have been subject to noise exposure from construction of the Western Sydney Airport and bulk earthworks for the IPG Master Plan site. As noted above, the exceedances of the NML at these three receivers relates to the civil works only, which represent a limited part of the construction program. No exceedances of NMLs are predicted during warehouse construction and building services and operational fit-out.

Feasible and reasonable work practices will also be implemented during construction to reduce construction noise levels below the NMLs. Additionally, construction noise is predicted to remain below the highly noise affected level at all assessment locations for the duration of the proposed construction works.

Construction Vibration

Construction vibration impacts on human comfort and structural integrity are considered as part of the NVIA. In relation to the human comfort response, the nearest residential assessment locations including residual residences within the Aerotropolis are located more than 600m from the closest proposed construction activities. These residential properties are located well beyond the safe working distances for human responses. Accordingly, vibration impacts at residential assessment locations arising from the construction of the proposed development are highly unlikely.

The nearest structure to the proposed development will be the approved Aldi warehouse (currently under construction) located to the south of the site. The NVIA concludes that the proposed construction works will not result in any exceedances of structural vibration safe working distances in relation to the Aldi warehouse.

Operational Noise

During the operation of the proposed development noise is likely to be generated from the following sources:

- Delivery loading/unloading of trucks
- Automatic robotic operations

- Print on demand facility consisting of conveyors and mechanical printing
- Heavy vehicles (semi-trailers and b-doubles) entering and traversing the site
- Electric fork trucks manoeuvring around the site
- Light vehicles moving around the car park
- Mechanical plant

Predicted noise levels for the operational phase have been assessed against established Project Noise Trigger Levels (PNTL) for the day, evening and night periods. Adjustments to the predicted noise levels for annoying characteristics have not been applied as none of the noise sources are deemed to be tonal in nature or result in either excessive low-frequency noise or intermittent noise at assessment locations.

Based upon the anticipated operations listed above, the modelling confirms compliance with the project noise trigger levels for all assessment locations during all operational periods (i.e. day, evening and night).

Noise levels resulting from the operation of emergency mechanical plant (smoke extraction fans) will exceed the PNTLs at four receivers (located within NCA2) by up to 3 dB during the night period only. However, the anticipated exceedance is acceptable given that it relates to emergency operations. Noise from the emergency plant will also be screened in the future by additional intervening built form.

Predicted noise levels arising from the operation of the proposed development will comply with sleep disturbance criterion for all residential assessment locations.

6.3.3 Mitigation Measures

The NVIA identifies mitigation and management measures for both the construction and operation phases as detailed below:

Construction

Feasible and reasonable mitigation measures to reduce construction noise levels will be reviewed and implemented where complaints are received and validated by exceedance of a Noise Management Level. Work practice methods may include:

- Regular reinforcement (such as at toolbox talks) of the need to minimise noise and vibration.
- Avoiding the use of portable radios, public address systems or other methods of site communication that may unnecessarily impact upon nearby residents.
- Develop routes for the delivery of materials and parking of vehicles to minimise noise.
- Where possible, avoid the use of equipment that generates impulsive noise.
- Notify residents prior to the commencement of intensive and out of hours works (if required).

Additional measures for plant and equipment may include:

- Where possible, choose quieter plant and equipment based on the optimal power and size to most efficiently perform the required task.
- Operate plant and equipment in the quietest and most efficient manner.
- Minimise the number of plant and equipment operating simultaneously while still meeting processing requirements.
- Switch off idle plant.
- Regularly inspect and maintain plant and equipment to minimise noise and vibration level increases, to ensure that all noise and vibration reduction devices are operating effectively.

Noise monitoring will be undertaken during the initial stages of construction to confirm actual construction noise levels. If NMLs are exceeded the contractor will identify feasible and reasonable mitigation measures that reduce construction noise levels to at or below NMLs where practical.

Operational

The proposed development will not result in any predicted exceedance of PNTLs or sleep disturbance criteria. Accordingly, mitigation measures are not required for the operational phase of the proposed development.

Notwithstanding, the NVIA recommends that Broadband (non-tonal) ambient level adjusting movement alarms are installed on all fleet to avoid any potential instances of tonal noise impacts. Additionally, verification monitoring will be completed once the proposed development is fully operational to confirm the accuracy of predicted noise levels at the most affected receivers and that there are not any unexpected exceedances of PNTLs.

6.4 Water Management

An Integrated Water Management Strategy has been prepared by AT&L (Appendix Z). It establishes the integrated water management framework for the site, including a permanent stormwater strategy, its relationship with the regional stormwater system and the operational management framework.

6.4.1 Existing Environment

The existing water environment relevant to the site includes:

- Badgerys Creek to the west
- Unnamed minor watercourse to the east
- Two existing second order streams on the western edge and central part of the IPG site. These streams are characterised by low gradient and limited riparian vegetation.
- Wider Wianamatta-South Creek corridor at the eastern edge of the IPG precinct.

Regional drainage, water quality treatment and stormwater reuse infrastructure are to be delivered as part of the IPG master plan precinct works. Stormwater infrastructure in the form of online detention basins as well as interim wastewater infrastructure to serve the development in Stage 1 and Stage 2 of the IPG Master Plan are being delivered under a separate planning pathway package (via CDC).

Sediment Basins 208, 210.1 and 210.2 will be delivered within the vicinity of the site and will receive and manage runoff from the proposed development during construction works. Upon completion of the construction works, and once the receiving catchments from the IPG estate are stabilised, the sediment basins are to be converted to regional basins as part of the permanent precinct stormwater infrastructure.

6.4.2 Construction phase

A Soil and Water Management Plan (Appendix X) has been prepared by AT&L and details the likely impacts of construction works on water resources. Earthworks to be undertaken as part of the proposal include the refinement of the development platform (delivered separately by IPG). Additional bulk earthworks are also proposed and will predominately be focussed in the southern part of the site.

Erosion and sediment control measures will be implemented during the construction phase in accordance with the relevant standards and guidance. The proposed measures will include:

- Stabilised site access and truck washdown or wheel wash arrangements
- Perimeter sediment fencing and barrier fencing (where required)
- Geotextile and mesh or gravel inlet protection measures
- Catch drains, check dams and temporary clean-water diversion measures
- Temporary sediment basin measures during peak disturbance phases
- Progressive stabilisation of exposed areas, batters and inactive work areas
- Protection of permanent drainage assets until contributing areas are effectively stabilised.

Sediment basins for the IPG precinct have been designed under the approved masterplan. Several basins will be located in close proximity to the site. During the construction of the proposed development, these basins will function as a sediment basin system serving the broader precinct. Following completion of construction and stabilisation of the receiving catchments, the basins will be converted to regional stormwater basins.

The sediment controls are to be designed and operated to achieve at least 80% hydrological effectiveness.

6.4.3 Permanent Stormwater Strategy

The proposed stormwater drainage strategy involves connecting the site to the approved precinct stormwater infrastructure. The site will operate as a collection, treatment, control and discharge system that connects into the IPG precinct stormwater infrastructure. The IPG precinct infrastructure in turn forms part of the wider regional drainage and stormwater reuse approach.

The precinct and regional stormwater system will perform the downstream functions of conveyance, basin storage, regional treatment and stormwater harvesting and reuse. The precinct stormwater system will be delivered prior to the operation of the proposed development. Accordingly, the proposed stormwater strategy for the site does not require a separate interim solution. Measures to be implemented during construction are addressed in the Soil and Water Management Plan.

The proposed drainage strategy for the site is based on four (4) catchments and four (4) drainage connection points. Runoff generated within each catchment is to be collected and conveyed through the permanent on-site drainage system to a defined connection point, with treatment, storage and control infrastructure provided before runoff enters the precinct and regional stormwater system (including the adjacent basin and drainage corridor system). The four catchments remain hydraulically separate and will drain to corresponding on-site treatment, isolation and control mechanisms prior to discharge from the site.

The proposed stormwater drainage system within the site will include a minor drainage system designed to convey the 5% AEP event and a major drainage system designed to safely manage the 1% AEP event.

The proposed treatment, isolation and control measures include:

- Gross Pollutant Traps located upstream of the site discharge interfaces
- Fire tank infrastructure integrated with the permanent drainage response
- Penstock valves to provide flow control and operational management at the relevant treatment and control locations
- Permanent drainage infrastructure for collection, conveyance and control discharge or site runoff.

MUSIC and RAFTs modelling has been undertaken to assess the proposed development against the relevant stormwater quality and stormwater quantity requirements.

Stormwater Quality

The table below details the proposed development's performance against the adopted stormwater quality targets based on MUSIC modelling. As set out below and within the Integrated Stormwater Strategy, the proposed development will comply with each of the relevant stormwater quality targets (including the annual load reduction targets and allowable mean load targets at the point of discharge).

Table 26 MUSIC modelling stormwater quality

Parameter	Adopted target	Reported result	Compliance
Total Suspended Solids (TSS)	90% reduction	91.5% reduction	Complies
Total Phosphorous (TP)	80% reduction	84.1% reduction	Complies
Total Nitrogen (TN)	65% reduction	73.9% reduction	Complies
Gross Pollutants (GP)	90% reduction	98.1% reduction	Complies

Stormwater Quantity

Stormwater quantity performance has been assessed using the RAFTs modelling framework. The assessment concludes that post-development peak flow rates are less than or equal to pre-development peak flow rates for the 1% AEP event. Accordingly, the proposed development is capable of operating within the adopted stormwater quantity performance criteria.

Run-Off Volume

Runoff volume has been assessed using the adopted MUSIC modelling framework. Table 28 assesses the proposed developments compliance with established runoff volume criteria and shows that the proposed development will satisfy the adopted run-off volume targets.

Table 27 Runoff volume performance results

Metric	Adopted target	Reported result	Compliance
Mean Annual Runoff Volume (MARV)	≤ 2 ML/ha/year at the point of discharge to the local waterway	1.63ML/ha/year	Complies
90th percentile flow	1,000 to 5,000 L/ha/day at the point of discharge to the local waterway	2,930L/ha/day	Complies
50th percentile flow	5 to 100 L/ha/day at the point of discharge to the local waterway	26L/ha/day	Complies
10th percentile flow	0 L/ha/day at the point of discharge to the local waterway	0L/ha/day	Complies

Operation, maintenance, monitoring and adaptive management

Ongoing maintenance of the on-site drainage network, GPTs, fire tanks and associated isolation and control measures, as well as the defined discharge interfaces, will be undertaken. Monitoring is to be undertaken through routine operational inspections and maintenance reviews, with additional inspections following significant rainfall events where required.

Where inspections or monitoring identifies that the drainage system is not performing as intended, corrective action will be undertaken.

6.4.4 Groundwater

The proposed water management response for the site is not based on collection, conveyance, treatment, isolation, control and discharge rather than infiltration-driven stormwater disposal. Accordingly, significant adverse permanent groundwater impacts are not anticipated.

Groundwater impacts are further considered in Section 6.10 below.

6.4.5 Riparian and waterway assessment

The site does not include or immediately bound any Riparian Corridors. Subject to the implementation of the permanent stormwater strategy and the IPG stormwater infrastructure, the proposed development will not give rise to any unacceptable impacts on riparian corridors or waterways.

6.5 Visual Impact

6.5.1 Existing Environment

Urbis has prepared a detailed Visual Impact Assessment (VIA) to support this EIS (Appendix L). The VIA notes that the site is currently characterised by open grassland and remnant vegetation and includes generally flat to gently undulating terrain and no pronounced ridgelines or steep landforms. In its current form, the land is

influenced by nearby riparian corridors associated with Badgerys Creek and related drainage lines, which form part of the wider environmental network in the locality.

Notwithstanding, the site is located within an evolving context associated with development of the WSA. The approved IPG masterplan envisages large industrial and commercial buildings across the site including high-bay warehouses up to 52.5 metres in height. Development on the IPG estate has commenced to the south and bulk earthworks required to create a development pad on the site will also be completed prior to the commencement of the proposed development.

Surrounding uses to the north of the site currently include a quarry and brick making facility. Further north is a mix of rural and agricultural land that are subject to SSDAs for industrial and warehouse development. To the south-west lies the future Bradfield City Centre and east of Wianamatta-South Creek is Kemps Creek, which contains open space, rural and agricultural land, emerging urban development and residential properties. To the north-west across Badgerys Creek is the Western Sydney International Airport.

Potential visibility of the proposed development has been determined by Urbis during fieldwork observations and via desktop assessment. Due to the underlying topography and presence of vegetation within the surrounding area, the visual catchment of the proposed development will be constrained. The riparian corridors surrounding Badgerys Creek and South Creek consist of large, mature trees that will effectively screen the site and likely the proposal (given the currently proposed maximum building heights) from views from other roads surrounding the site. Additionally, there are no public open / recreation spaces in the surrounding area that would be considered sensitive viewing locations.

Potential views to the site and proposal from the public domain include:

- A section of Badgerys Creek Road west of the site between the Badgerys Creek riparian corridor and approximately 355 Badgerys Creek Road to the south where the road turns southwards and vegetation and built-form limits views.
- Badgerys Creek Road south of the site (entrance into Bradfield City Centre).

Private views of the proposed development will also be limited by intervening development and the riparian corridors around the site. Views of the development may be possible from properties located at 270 Badgerys Creek Road; 300 Badgerys Creek Road and 355 Badgerys Creek Road.

Views of the development will be further screened following the completion of the Adli development to the south and other development envisaged in the IPG masterplan.

Overall, the VIA notes that the site has low public view public view place sensitivity. Private view place sensitivity is also limited due to the presence of vegetation and built-form in the surrounding context.

6.5.2 Impact Assessment

Urbis undertook a desktop review of all relevant statutory and non-statutory documents, an analysis of aerial imagery and topography and lidar data to establish the potential visual catchment to inform fieldwork inspections. Six (6) view locations were subsequently selected for further analysis:

1. Badgerys Creek Road north of Badgerys Creek
2. View north-east outside 260 Badgerys Creek Road.
3. View north-east from outside 300 Badgerys Creek Road
4. View south-west from future roundabout (within IPG Master Plan)
5. View north-west from future public park (within IPG Master Plan)
6. View north from Bradfield south of the site.

Figure 25 Viewpoint Location Map



Photomontages for each view have been prepared in accordance with the Land and Environment Court of New South Wales photomontage policy and are replicated below. The photomontages show the proposed development in isolation and the site in its current state (i.e. without the approved bulk earthworks that will occur prior to the proposed development). They do not show the extent of built form envisioned in the site's vicinity by the approved IPG masterplan or the Aldi SSDA.

Figure 26 Viewpoint 01 – Badgerys Creek Road north of Badgerys Creek



Source: Urbis, 2026

Figure 27 Viewpoint 02 – View north-east outside 260 Badgerys Creek Road



Source: Urbis, 2026

Figure 28 Viewpoint 03 – View north-east from outside 300 Badgerys Creek Road



Source: Urbis, 2026

Figure 29 Viewpoint 04 – View south-west from future roundabout within the IPG Masterplan



Source: Urbis, 2026

Figure 30 Viewpoint 05 – View north-west from future public park within the IPG Masterplan



Source: Urbis, 2026

Figure 31 Viewpoint 06 – View north from Bradfield south of the site



Source: Urbis, 2026

Having determined the extent of the visual change based on the six (6) representative public domain modelled views (photomontages) Urbis have applied relevant weighting factors to determine the overall level of visual impacts or importance of the visual effects. The factors have been considered in relation to the visual effects to provide up-weight or down-weights and to determine a final impact rating. The weighting factors include sensitivity, visual absorption capacity and compatibility with urban features.

A summary of the assessed 'visual effect'; 'weighting factors' applied; and overall visual impact rating for each viewpoint is provided in Table 28.

Table 28 Summary of Visual Effects and Weighting Factors

Visual Effect	Viewpoint					
	VP1	VP2	VP3	VP4	VP5	VP6
Visual Character	nil	low-medium	medium-low	medium	low-medium	low
Scenic Quality	nil	low	low	low-medium	low	low
View Composition	nil	low	medium-low	medium	low-medium	low
View Blocking of Scenic Elements	nil	low	low	low	low	low
Weighting Factors	VP1	VP2	VP3	VP4	VP5	VP6
Public Domain View Place Sensitivity	nil	medium	medium	low	low	low
Physical Absorption Capacity	nil	high	low	low	medium	high
Compatibility with Urban & Visual Context	nil	low	low	low	low	medium
Viewing Period	nil	low	low	low	low	low
Viewing Distance	nil	medium	medium	medium	medium	medium
Visual Impact Rating	VP1	VP2	VP3	VP4	VP5	VP6
	Nil	Low	Medium-low	Medium	Low-Medium	Low

As stated in the table above, the visual impacts of the proposed development at the assessed viewpoints range from nil to 'Low-medium'.

The VIA concludes that overall the visual impacts of the proposed development are acceptable and the proposal is supported on visual impact grounds for the following reasons:

- The site has low scenic quality, with a utilitarian working landscape, no significant vegetation, and minimal built form.
- Private views are limited to a small number of properties on Lawson Road and Martin Road.
- Public views are limited to short sections of Lawson Road, Martin Road, and part of Badgerys Creek Road.

- There are no high value public viewing places, recreation areas, heritage items, or documented views to or across the site.
- Photomontage analysis found visual impacts ranged from Nil to Medium (two Nil, one Low, one Medium).
- Riparian corridors along Badgerys Creek and South Creek provide substantial screening, reducing visibility from most public locations.
- Public view sensitivity is low, with most views brief and incidental, typically from passing motorists.
- Short viewing periods and greater distances further reduce perceived visual effects.
- Residual visual impacts are low and acceptable given the changing rural-to-urban context and strong vegetation screening.

Furthermore, the proposed development is consistent with the built form envisaged for the site under the approved IPG Master Plan. The proposed height, bulk and scale of the ADC is consistent with that interrogated and considered suitable as part of the Master Plan approval process and will be further screened and softened by the significant landscaping proposed on the site. The built form proposed in the Master Plan will likely block the development from some views to the south, west and east of the site, including those assessed as part of the VIA.

6.6 Landscaping

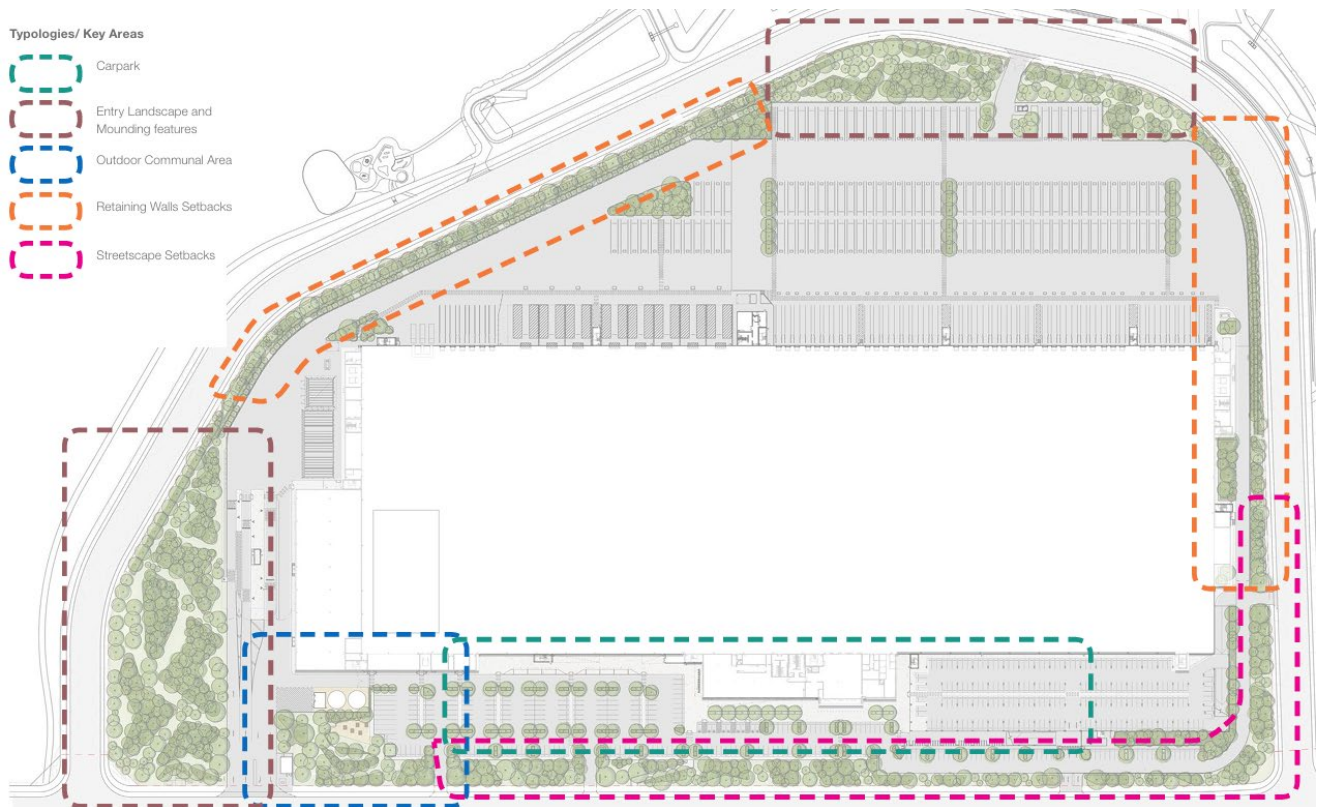
The proposed development will incorporate high quality landscaping as detailed within the accompanying Landscape Report and Landscape Plans prepared by Site Image (Appendix N and Appendix O).

Approximately 15.6% of the site area will be landscaped, which exceeds the minimum requirements set out in Section 8.6.2 of the IPG master plan.

The landscape design has been based on the following key design principles:

- **Connecting to Country:** The proposal embeds a strong connection to Country by adopting themes developed in the IPG master plan and applying them in a tangible thread throughout the design. The proposed planting selection predominately comprises endemic species, whilst the landscaped areas have been designed to respond to the shapes and forms of Wianamatta South Creek and Badgerys Creek. Subtle mounding within the landscaped areas references the historical topography of the site and its surrounds including the soft hills of the Cumberland Plain Woodland.
- **A Focus on Canopy and Cooling:** the landscape strategy prioritises increased canopy coverage and shade provision to mitigate the urban heat island effect. Tree planting, combined with understorey and groundcover, will contribute to microclimate regulation, reduce surface temperatures, and improve overall thermal comfort for users across the site.
- **Places for People:** The landscape is designed to be inclusive, accessible, and visually engaging for all users of the broader site. Clear sightlines, inviting open spaces, and integrated pathways will create opportunities for passive recreation, movement, and social interaction, enhancing the overall user experience and encouraging connection with the landscape.
- **Landscape-Led Approach:** A landscape-led design approach underpins the proposal, where engineering and infrastructure solutions are integrated and softened through green infrastructure. Passively irrigated planting zones have been carefully coordinated to deliver both functional performance and ecological value.

Figure 32 Landscape Concept Master Plan



Source: Site Image (2026)

The proposal also adopts a green infrastructure approach consistent with the NSW Greener Places Framework through layered landscaping and generous canopy coverage. A total canopy coverage of 14.1% is achieved within the site, representing a minor variation to the Alternative Benchmark Solution set out within Section 8.6.2 of the IPG Master Plan. This variation is further discussed in Appendix C.

Notwithstanding, the landscaping approach represents a context-specific response that will enhance the amenity of the site and positively contribute to the character of the emerging streetscape. The proposed planting approach has been reconciled with several other constraints including future tenants security requirements, bush fire mitigation controls, wildlife attraction and the restricted tree species permitted within proximity of the new Western Sydney International Airport.

Sculptured planted zones are provided along the Road 03 frontage, which will contain a mix of low grasses and undercovers beneath trees to maintain visibility. Trees within the frontage and along the site boundaries have been staggered to increase the prominence of the canopy within the streetscape.

Along the front (southern) setback, large native tree species are proposed, which will have a mature height of a similar scale to the proposed development. Elsewhere, a range of tree species (varying in height and width) will be planted. The proposed approach including dense tree planting will positively contribute to the long-term landscape setting and streetscape of the site by creating a natural interface along the site boundaries (extending towards the adjacent Riparian Corridors) and softening and screening the built form.

Entry landscape feature planting and mounding, including sandstone boulders and features walls that use locally sourced and recycled materials, will create an engaging entrance to the site. A landscaped outdoor amenity area is also proposed, which will further enhance the amenity of the site for future staff and visitors.

Figure 33 Proposed communal outdoor area

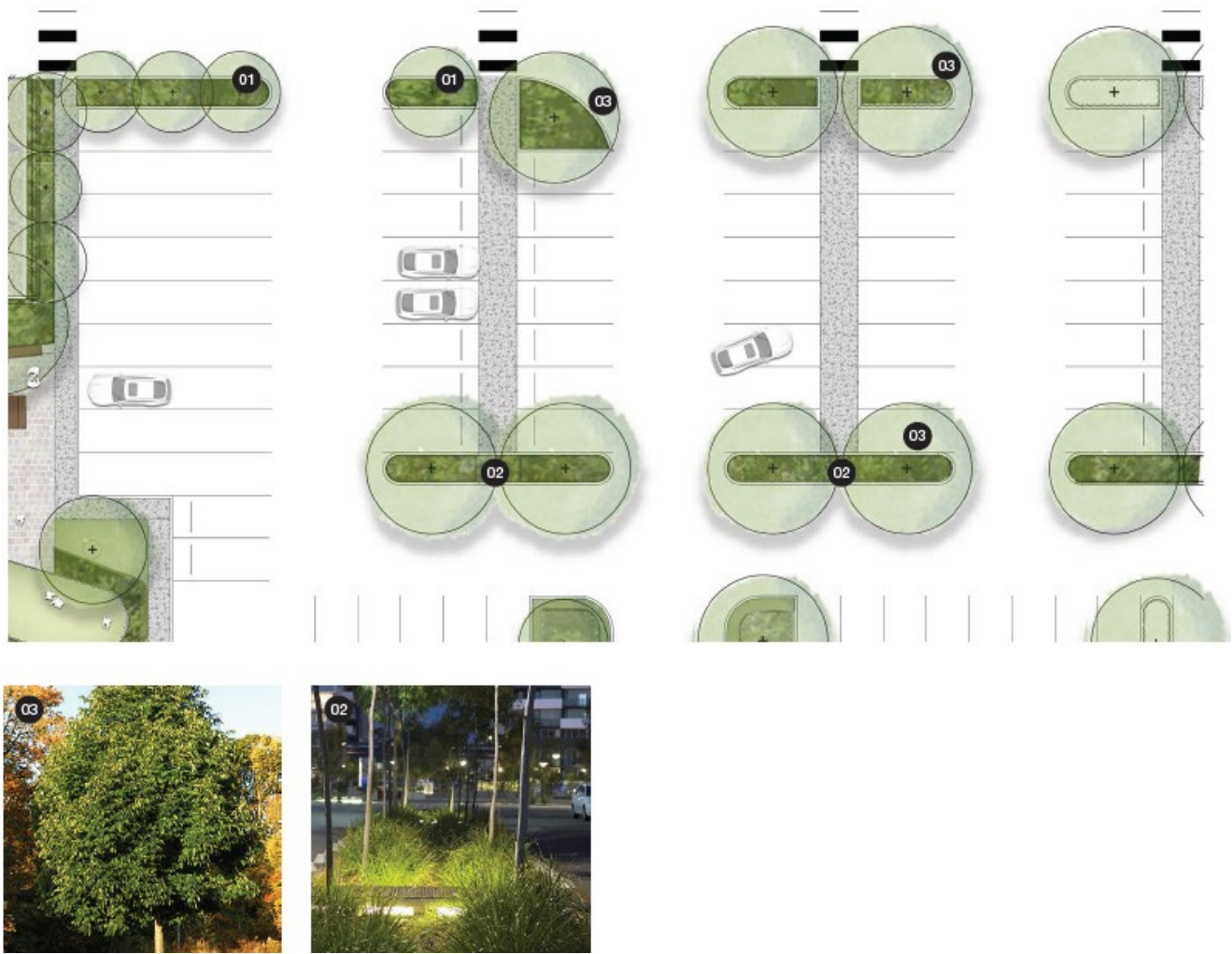


Source: Site Image (2026)

The proposed landscaping strategy will combat the urban heat island effect by maximising canopy coverage and supporting the broader landscape approach across the IPG estate. The proposed landscaping has been strategically distributed across the site to provide shade to hardstand areas, reduce surface temperatures and improve microclimate conditions.

A layered planting approach proposed, which includes low understory plants along with small and larger trees and will work symbiotically to cool the local environment. Low native grasses, canopy trees and island planters are provided throughout the car park to further reduce the urban heat island effect.

Figure 34 Proposed car park planting

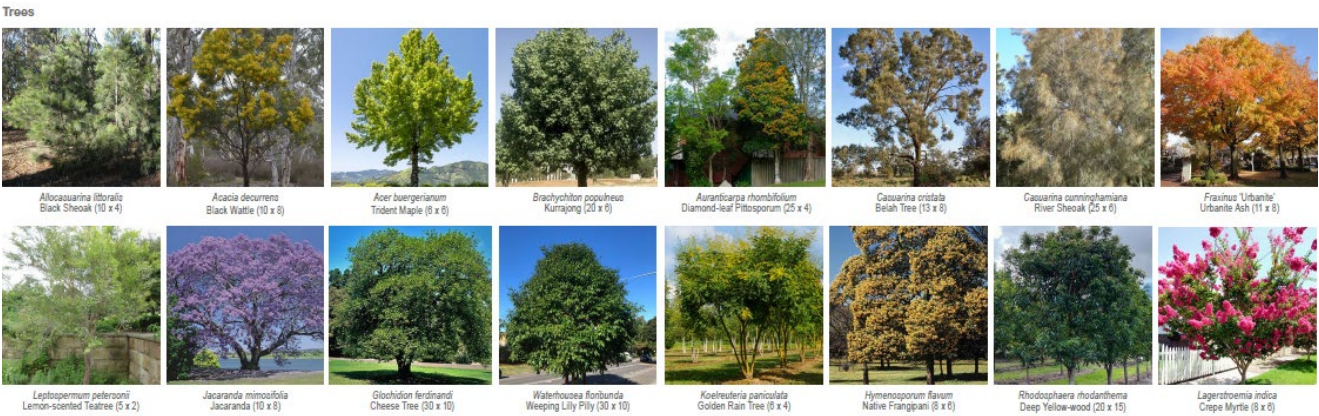


Source: Site Image (2026)

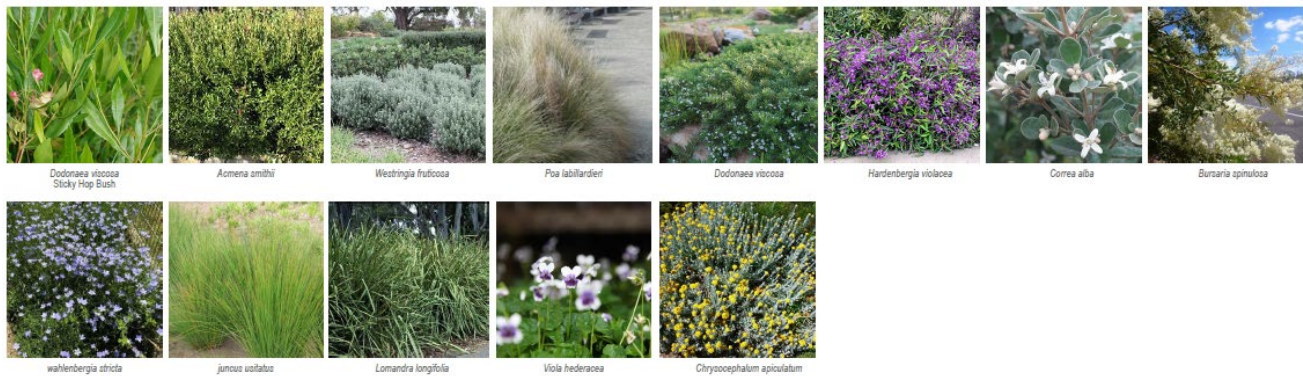
Species Selection

The planting strategy proposes exempt tree species that reduce the likelihood of nesting birds to reduce wildlife risk and bird-strike issues given the site’s proximity to the Western Sydney International Airport. In addition, locally native species have been provided to support the local ecosystem and Connect to Country.

Figure 35 Proposed Planting Strategy



Shrubs and Groundcovers



Source: Site Image (2026)

6.7 Ecologically Sustainable Development

An Ecologically Sustainable Development Report has been prepared by Northrop (Appendix P). The report describes the proposed Ecologically Sustainable Development (**ESD**) measures and includes an assessment of the proposal against the relevant sustainability provisions of the Sustainable Buildings SEPP, Western Sydney Aerotropolis Precinct Plan and the Western Sydney Aerotropolis DCP.

The proposed ESD strategy aims to minimise the impact, and where feasible, enhance the ecological, social and economic outcomes associated with the proposed development. It focuses on a range of measures related to energy efficiency; energy generation; indoor environment quality; water efficiency; water sensitive urban design; circular economy and waste management; low impact materials; mitigating the urban heat island effect; and enhancing ecology.

The measures proposed respond to industry best practice and National Construction Code (NCC) Section J – Energy Efficiency Targets. Specific sustainability initiatives proposed include but are not limited to:

- The building design will incorporate energy efficiency measures consistent with, and where practicable improving upon, the requirements of Section J of the National Construction Code.
- Designing a highly efficient façade wall-glazing system for the office and amenities building to minimise heat gains while maximising daylight entry for day time occupied areas.
- Incorporating Photovoltaic panels on the roof of the warehouse building. A solar panel canopy will also be located above the car parking spaces located on level 1 of the multi-deck car park.
- Reducing potable water use through high WELS-rated sanitary fixtures and fittings.
- Collecting and reusing rainwater to conserve water resources.
- Increasing the use of daylighting to reduce reliance on artificial lighting and lower power consumption.
- Implementing comprehensive waste minimisation strategies.
- Adopting Water Sensitive Urban Design (WSUD) principles to manage stormwater effectively and protect water quality.
- Installing a solar array to generate renewable energy and reduce dependency on the grid.
- Providing electric vehicle (EV) charging infrastructure to support the transition to low-emission transport.
- Incorporating secure bicycle parking to encourage active transport.
- Selecting low-carbon materials to minimise embodied carbon in construction.

The inclusion of the various sustainability measures summarised above and detailed within the ESD Report demonstrate the proposal's commitment to ESD principles in accordance with the statutory planning framework. An Embodied Emissions Material Form (Appendix Q) has also been prepared to disclose the

number of embodied emissions attributable to the development as required by section 35BA of the EP&A Regulation.

6.8 Air quality and odour

An Air Quality Impact Assessment (**AQIA**) has been prepared by Northstar (enclosed in Appendix S). The assessment also considers the likely odour impacts of the proposal during construction in accordance with the SEARs.

The AQIA comprises a quantitative modelling assessment of the potential air quality impacts and has been conducted in accordance with NSW Environment Protection Authority (**EPA**) guidance, the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (**NSW EPA 2022**).

6.8.1 Existing Environment

The Bureau of Meteorology maintains and publishes data from weather stations across Australia. The closest station recording wind speed and wind direction data is the Badgerys Creek AWS (Station ID 67108) located approximately 1.4 km northwest of the Site. The Badgerys Creek AWS has data available for the following parameters:

- Wind speed (m/s) and wind direction (degrees)
- Temperature (°C)
- Rainfall (mm)
- Relative humidity (%)

Wind roses show the frequency of occurrence of winds by direction and strength. The bars correspond to the 16 compass points (degrees from North). Annual and seasonal wind roses for 2021 to 2025, compiled from data recorded by the Badgerys Creek AWS, are presented in the AQIA. An analysis of the BoM data indicates that most wind speeds at Badgerys Creek AWS between 2021 and 2025 range from 1.5 m·s⁻¹ to 5.5 m·s⁻¹. The highest wind speeds (more than 8 m·s⁻¹) occur predominantly from southwestern directions, representing 1.4 % of observed hours, while calm winds (less than 0.5 m·s⁻¹) occur during 8.1 % of the time (on average).

Background air quality in the vicinity of the Site has been characterised using information obtained from the NSW DCCEE air quality monitoring network. The nearest NSW DCCEE operated Air Quality Monitoring Station (AQMS) to the Site is located at Bringelly, approximately 2.5 km to the south-east. The Bringelly AQMS monitors fine particles as PM₁₀ and PM_{2.5} and NO₂ and other pollutants. The existing air quality in the study area is generally considered to be good to fair, based on the air quality criteria for pollutants.

6.8.2 Potential Impacts

Construction

Construction phase activities have the potential to generate short-term emissions of particulates. These are generally associated with uncontrolled ('fugitive') emissions and are typically experienced by neighbours as amenity impacts (e.g. dust deposition and visible dust plumes) rather than associated with health-related impacts. Localised engine-exhaust emissions from construction machinery and vehicles may also be experienced.

Modelling of dust from construction activities is generally not considered appropriate. In lieu of a modelling assessment, the construction-phase impacts associated with the proposed development have therefore been assessed using a risk-based assessment procedure. The approach is based on the methodology set out within the Institute of Air Quality Management's (UK) 'Guidance on the Assessment of Dust from Demolition and Construction'.

The assessment confirms that, without the implementation of any mitigation measures, the proposed construction phase will result in low risks in terms of dust soiling and human health impacts. However, if

mitigation (dust management) measures are implemented appropriately during construction any impacts related to fugitive dust emissions are likely to be negligible. Accordingly, subject to the implementation of the dust management measures detailed in the AQIA, the proposed development can be constructed without causing adverse health and amenity impacts on surrounding land uses.

Additionally, localised odour or air pollutants during construction are expected to be minor due to the scale and nature of the works, and the short duration of asphaltting.

Operation

The operational phase assessment focuses on predicting the change in air quality impacts due to additional traffic on Badgerys Creek Road. Operational phase impacts have been assessed using a screening-level approach. This approach is designed to ensure that the assessment effort is proportional to the potential scale of the impacts. Nonetheless, the impacts are calculated based on conservative assumptions contained within the screening model and the actual impacts associated within the proposed development are therefore likely to be lower than those predicted in the AQIA.

The results of the approach indicate that:

- Based on the assumptions and background concentrations adopted, impacts of all pollutants assessed over all averaging periods are predicted to be compliant with the respective criteria at 20m and 50m from the kerbside (i.e. at the locations of sensitive receptors).
- For annual average NO₂, incremental impacts are less than 5 % of the criterion.
- For 24-hour averages for particulates, incremental impacts are shown to be minor for PM₁₀ and PM_{2.5} being less than 3 % of the respective criterion.
- For annual averages for particulates, incremental impacts are shown to be minor for PM₁₀ and PM_{2.5} being less than 3 % of the respective criterion.
- Incremental impacts are demonstrated to reduce with increasing distance from kerbside.

The results indicate that the proposed development is expected to achieve the relevant air quality criteria, with impacts varying from 'negligible' to 'slight', and will have minimal impact on existing air quality during the operational phase.

6.8.3 Cumulative Impact Assessment

A cumulative impact assessment has been undertaken in accordance with the NSW Department of Planning and Environment's '*Cumulative Impact Assessment Guidelines for State Significant proposals*' (**CIA Guidelines**) (DPHI, 2022) to assess the impact of the proposed development (during both construction and operation) combined with other surrounding development.

The assessment applies a proportionate approach based on the status and likely influence of surrounding developments. Background air quality data has been used to characterise existing ambient conditions, independent of the proposed development.

The construction cumulative impact assessment concludes that limited cumulative impacts may arise during overlapping construction phases, primarily related to dust soiling and human health risks. Notwithstanding, each development is required to have a Construction Environmental Management Plan (**CEMP**), that include waste and traffic management measures. Dust emissions from construction are well understood and can be effectively mitigated to minimise significant cumulative impacts.

Similarly, limited cumulative impacts may arise during operation of the proposed development, primarily related to traffic affecting Badgerys Creek Road. However, individual SSDAs will be required to prepare (or have prepared) traffic impact reports and air quality impact reports. Accordingly, the air quality impacts of these developments are or will be well documented, understood, and managed and no significant cumulative impacts are anticipated during site operations.

6.8.4 Mitigation Measures

Construction

The AQIA identifies mitigation measures that are anticipated to be implemented in the Construction Environmental Management Plan (**CEMP**). The mitigation measures are intended to manage the air quality impact risks during construction. They include both general measures (including site management and communications) as well as measures associated specifically with the proposed earthworks, construction and track-out. Refer to the AQIA for further information.

Operation

To maintain the predicted performance and manage any unforeseen issues, the following measures are proposed during operation:

- Minimising vehicle idling times around the Site using best management practices, including:
 - vehicle engines to be turned off when loading/unloading; when drivers are on a break, or waiting to get administrative clearances
 - Installation of appropriate signage at relevant locations encouraging drivers to switch off engines when not in use.
- Mobile heavy lift equipment and other vehicles operated on site are to be maintained and operated as per manufacturer specifications or best practice requirements.
- Traffic controls/signage are to be maintained to support efficient traffic flow and minimise unnecessary braking and acceleration where practicable
- Establish and maintain access roadside vegetation/groundcover (where provided) to stabilise exposed soils and reduce wind-blown dust from batters/verges
- Dust suppression and standard environmental controls will be applied during routine maintenance activities (e.g. shoulder grading, pavement repairs, vegetation maintenance), as required; and
- Any substantiated air quality/dust complaints will be investigated and responded to, with corrective actions implemented where required.

6.9 Waste Management

A Waste Management Plan (**WMP**) has been prepared by Urbis (Appendix EE) to address the relevant requirements of the SEARs. It considers the waste impacts of the construction and operational phases of the proposed development and identifies the anticipated waste sources; amount of waste generation; and the proposed management and mitigation measures.

The WMP aims to prioritise the prevention and minimisation of waste generation, followed by the effective management of wastes (storage, handling, transport, recycling and disposal) in a manner that minimises impact on the environment and improves resource recovery. The WMP has been prepared in accordance with the controls and provisions of the *Western Sydney Aerotropolis Development Control Plan 2022*.

6.9.1 Construction Waste

A preliminary Construction and demolition waste management plan has been prepared for the site to identify the anticipated waste from construction works (noting that the proposal does not include any demolition). A detailed CDWMP will be prepared post-consent and incorporated into the Construction management Plan.

The preliminary CDWMP aims to reduce the amount of construction waste going to landfill; facilitate the reuse of waste; and ensure that waste can be disposed of in a safe and efficient manner. Construction waste is anticipated to be generated from earthworks and site preparation as well as the construction of external hardstands, paved areas as landscaping; the concrete frame; and the building façades.

All waste generated throughout construction will be effectively stored, handled, treated, reused, recycled and / or disposed of lawfully and in a manner than minimises environmental harm. Waste will be managed in accordance with the waste hierarchy to maximise diversion from landfill. A minimum 90% diversion rate from landfill will be targeted during the construction phase

In the context of the proposed development, the approach of the waste hierarchy can be generally considered as:

- Re-use (onsite): Direct and immediate re-use of materials onsite as part of subsequent construction activities.
- Re-use (offsite): Re-use of materials offsite under separate construction activities unrelated to the subject development.
- Recycle: Volumes sent to an offsite facility to be recycled into new products and/or on-sold for further use.
- Dispose: Volumes sent to landfill / clean fill for end disposal. Materials are not harnessed for any further use.

Table 30 outlines typical C&D waste materials and opportunities for recovery. These are recommendations only and material reuse and recyclability once it leaves the site are the responsibility of the off site recycling site.

Table 29 Typical C&D Materials

Waste Stream	Reuse and Recycling Recommendations	
	Reuse	Recycle
Bricks	Cleaned and/or rendered for reuse onsite or offsite. May also be crushed for use as fill.	Transported to a C&D waste recycler for crushing / recycling into recovered products.
Concrete / Ceramics / Fines	May be crushed onsite for applications as fill / gravel or used offsite as fill material.	Transported to a C&D waste recycler for crushing / recycling into recovered products.
Excavation Material	Reused onsite as fill or transported to a C&D waste recycling for recovery as fill under separate use or disposed as contaminated waste (if any).	N/A
Glass	N/A	Transported to a glass waste recycler for crushing / recycling into recovered products (e.g., aggregate for concrete).
Green Waste	Can be mulched onsite and applied to any existing green areas (e.g., for landscaping).	Transported to a recovery facility for processing into a mulch or compost materials.
Metals	N/A	Transported to a metals waste recycler for melting and moulding into secondary products (e.g., piping).
Plasterboard	May be crushed onsite for applications as fill / gravel or used offsite for other projects.	Transported to a C&D waste recycler for crushing / recycling into recovered products.

Waste Stream	Reuse and Recycling Recommendations	
	Reuse	Recycle
Roof Tiles	Can be cleaned and reused in its original form onsite or offsite for other projects. Otherwise, may be crushed for reuse in landscaping.	May be transported to a recovery facility for crushing / recycling into recovered products.
Timber (untreated)	Hardwood beams may be reused as floorboards, fencing, furniture, etc. Other timber materials may be mulched and used onsite for landscaping.	May be transported to a recovery facility for chipping and processing into a mulch or compost material.

A high-level (indicative) estimate of waste volumes generated throughout proposed construction works is provided in the table below. This estimate is based on Urbis held data from previous similar projects with construction waste data available.

Table 30 Estimated Construction Waste Materials

Waste Stream	Estimated Tonnage	% Typically Recovered	Estimated Diversion from Landfill (t)
Bricks / Ceramics	400	90%	360
Concrete	400	95%	380
Timber (untreated)	700	95%	665
Packaging	360	80%	288
Metals	90	100%	90
Other Waste (e.g. plasterboard, ceramics)	450	80%	360
Total	2,400.0	Total	2,143
% Diverted from Landfill		89.29%	

Waste skips shall be stored on-site unless granted permission by the relevant authority to utilise public space. All waste management facilities onsite will be conveniently located to enable easy access for onsite manoeuvring and collection and incorporated with other loading facilities/areas

The following safety measures will also be considered:

- Location of bins is not to interfere with the line of site of drivers entering or leaving the site
- Skips bins will be located in well-lit areas and clearly visible
- Safe paths of travel will be designated with reflective tape, barriers, and cones
- Skip bins will be secured and not be overfilled

6.9.2 Operational Waste

The operational waste management strategy has been developed in alignment with the relevant controls set out in State Environmental Planning Policy (Precincts—Western Parkland City) 2021 (WPC SEPP), the Western

Sydney Aerotropolis Precinct Plan, Western Sydney Aerotropolis Development Control Plan and better practice in Australia and similar development.

The table below identifies the anticipated waste streams arising from the operation of the proposed development.

Table 31 Waste Streams

Core Waste Streams	Additional Waste Streams
General Waste (Garbage)	Hard Waste / Bulky Waste
Commingled Recycling	Electronic Waste
Cardboard	Secure Paper
Food Organics	Soft Plastics
	Unique Waste Streams (e.g. light bulbs, polystyrene)
	Glass
	Polystyrene

Table 32 identifies the anticipated waste generation. The waste generation rate applied is based on waste volume data held by Urbis and sourced from volume data from a similar site operated by the client.

Table 32 Estimated Waste Generation

Use	Area (Net Leasable)	Weekly Waste Volume (Litres / Week)				
		General Waste	Recycling	Cardboard	Organics	Soft Plastic
Distribution Centre (Packing and Sorting)	62,062	108,609	2,482	358,718	6,206	81,301
Ancillary Office	253	142	71	106	18	18
Warehouse (Storage and conveying)	133,486	84,096	13,349	80,092	0	9,344
TOTAL		192,847	15,902	438,916	6,224	90,663

Table 33 provides a summary of the waste systems and collection arrangements for the proposed development. All waste collections will occur on-site directly from the loading dock area located to the north of the building. A 10.7m hook lift or smaller collection vehicle will be utilised to perform all collections, entering and exiting the site internal road, accessed via Road 03 of the overall Badgerys Creek Masterplan. For streams not managed within the compactors, a **12.5m rear loader collection** vehicle will be used, propping within the *loading areas*, with operators to collect the material directly from the waste area and return empty storage containers (if appropriate) immediately upon emptying.

Table 33 Waste Collection Summary

Stream	Item	Collections per Week	Collection
Garbage	1x 30m3 Compactor	2	All Collections by Private Contractor
Commingled Recycling	4x 1100 Litre Bin	2	
Cardboard	2x 30m3 Compactors	3	
Organics	9x 240 Litre Bins	3	
Hard Waste & Timber	2x 25m3 Skip Bin	Up to 1	
E-Waste	4x 1100 Litre Bins	Up to 1	
Soft Plastics	4x Bales	1	
Extended waste streams	Misc	As required	
* Extended waste streams (i.e. glass, CDS) will be collected on an as required basis due to the requirement to accumulate a sufficient volume of material prior to collection. Anticipated collection of approx. 1 per month per stream.			

The operational waste management plan anticipates that an area of 318.7 square metres is required to accommodate the anticipated number of compactors and waste and pallet storage. The proposed waste storage area is 638 square metres, which significantly exceeds this requirement.

External waste storage areas will be fully sealed / enclosed to avoid attracting birds and other wildlife that may pose a risk to the future operations of the WSI airport and / or amenity of the site. The waste storage area will be kept clean and designed to minimise noise impacts.

Summary

Overall, the WMP concludes that the proposed development is acceptable from a waste management perspective subject to the implementation of appropriate equipment to manage all waste streams and the implementation of the waste strategy.

6.10 Non-significant impacts not requiring Detailed Assessment

This section of the report addresses the matters that are expected to result in less than significant impacts and which therefore do not require a detailed assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

Issue (per SEARs)	Assessment
Airport safeguarding	An Aviation Impact Assessment (AIA) (Appendix KK) has been prepared by Avipro to assess the likely impacts of the proposed development and any associated future construction cranes on the operation of Western Sydney Airport. The report concludes that: - The proposed development will not intrude into the Western Sydney International Aerodrome (WSIA) Obstacle Limitation Surface (OLS), WSIA PAN-OPS surfaces or Sydney Radar Terrain Clearance Chart (RTCC). - The proposed development will not impact the approach and departure paths of any strategically important helicopter landing sites i.e., for hospitals

Issue (per SEARs)	Assessment
	▪ The proposed development will not intrude into the 1:35 slope and therefore does not trigger the requirement for a Windshear assessment. ▪ The proposed development has a 'very low' Wildlife attraction risk. ▪ Cranes required to construct the proposed development will not intrude into the WSIA PAN-OPS surfaces, Sydney RTCC or important helicopter landing sites. Additionally, the construction cranes required for the development are unlikely to intrude into the OLS. Construction cranes should therefore not require assessment by Civil Aviation Safety Authority (CASA) or CASA-standard aviation obstacle lighting. ▪ If at some point there needs to be a minor intrusion into prescribed airspace by a construction crane, this will require approval from aviation safety and airspace protection authorities. Overall, the report concludes that the proposed development, including its future construction cranes, will not adversely impact aviation safety in relation to the operation of the new Western Sydney Airport.
Hazards and Risk	The proposed development will include the storage of hazardous materials including 'Dangerous Goods'. Dangerous Goods will be stored in a walled section in the south-west corner of the ADC. The Dangerous Goods store will comprise aerosol caged storage, a fire rated mixed Dangerous Goods room and racked Class 5.1 storage. It will store a range of hazardous chemicals including aerosols, flammable liquids, flammable solids, toxics, corrosives, environmentally hazardous substances and oxidisers. A Resilience and Hazards Risk Screening has been undertaken by Acor in accordance with the guideline '<i>Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines (2011)</i>'. The screening assessment includes a comparison of the proposed dangerous goods storage against the relevant screening thresholds to determine whether the hazardous materials to be stored on site exceed the threshold limits and therefore result in the development being considered potentially hazardous. The Screening Report concludes that an Environmental Protection Licence is not required for the proposed development as the threshold limits for Chemical Storage (as set out in Schedule 1 of the Protection of the Environment Operations Act 1997) will not be exceeded. However, the proposed development is considered potentially hazardous as a result of the quantity of Class 2.1 aerosols to be stored on site. A Preliminary Hazard Analysis (PHA) (Appendix DD) was therefore also prepared by Acor in accordance with the Hazardous Industry Planning Advisory Paper No. 6 – <i>Guideline for Hazard Analysis and Multi-Level Risk Assessment</i>. The PHA concludes that the societal risks associated with the proposed storage of aerosols is insignificant and that the individual fatality risk is below the relevant land use criteria and considered to be tolerable. Accordingly, the Class 2.1 storage does not pose an unacceptable level of risk and is considered appropriate. Notwithstanding, a range of prevention and protection measures will be implemented to reduce risks. These include: ▪ Storage of dangerous goods will comply with relevant standards and regulations. The standards to be applied and the compliance requirements shall be documented in a Dangerous Goods report. ▪ A regular inspection program will be implemented for the Dangerous Goods store.

Issue (per SEARs)	Assessment
	- Storage will be racked or height restricted for safe loading and unloading of Dangerous Goods - Compliant wiring shall be used - Staff will be well trained in handling of hazardous chemicals - No ignition sources shall be installed within hazardous areas. - A dedicated smoking area will be located outside the building. A “no smoking” policy will apply to other areas of the site - The separation distance and segregation of different classes of dangerous goods will comply with the relevant standards - Entry and exits to the Dangerous Goods store will be marked and only limited to authorised personnel - An adequate fire protection system (smoke/thermal detectors, alarm system, fire sprinklers) will be installed in accordance with the fire engineering report and dangerous goods compliance requirements - Lighting will be installed according to Australian Standard AS1940 to ensure adequate illumination for all operations - Placarding according to SafeWork NSW, WHS Regulation 2017 and AS1940 will be installed on site. Safety Data Sheets (SDS) will be held for all materials - Emergency response plan (ERP) will be developed and staff trained in emergency response procedures
Flooding	A Flood Risk and Impact Assessment (Appendix W) has been prepared by AT&L. The assessment concludes that: - The primary source of flooding in the vicinity of the site is attributed to riverine flooding from Badgerys Creek to the west and flooding of an unnamed tributary to the east. - The site remains flood free in events up to and including the Probable Maximum Flood (PMF) event. The proposed earthworks pad level (66.5–67.8m AHD) is set several metres above the PMF flood level (62.2m AHD). - Flood evacuation of the site is not necessary in an extreme flood event as it is not in danger of inundation. In the event of flooding on the local road network, an action plan will be implemented involving either site evacuation or shelter-in-place depending on circumstances. A suitable space for staff and visitors to shelter in place has been identified within the proposed building. - The site remains flood free and is not impacted by flooding under a 1% Annual Exceedance Probability event with climate change scenario. - Flood impacts due to the proposed works will be negligible as there are no significant changes to the flood levels, flood behaviour or floodplain storage. The assessment confirms that the proposed development is fully consistent with the relevant planning policies and appropriate from a flood risk management perspective subject to the implementation of the following mitigation measure: - A Flood Emergency Response Plan (FERP) will be prepared prior to the occupation of the proposed development.
Bush Fire	A Bushfire Assessment Report (BAR) (Appendix JJ) has been prepared by Blackash Consulting to assess potential bushfire impacts of the proposed development in accordance with the <i>Planning for Bushfire Protection 2019</i> (PBP). It follows a previous report (dated June 2024) prepared by Blackash to assess the bushfire

impacts of the overall IPG master plan. Both the master plan assessment and the WSI3 BAR have been prepared on the future ultimate vegetation types expected to be present including fully restored riparian corridors within the IPG estate.

The WSI3 BAR notes that the majority of the site comprises Category 3 Bushfire Prone Land. An area of Category 1 Bushfire Prone Land is located to the north of the site, a small part of which is located in the IPG master plan site. The majority of the IPG estate comprises Category 3 Bushfire Prone Land. However, the IPG Master Plan works will significantly modify the vegetation of the wider IPG master plan site removing most of the vegetation and rehabilitating the riparian corridors. Accordingly, the specific Bushfire Prone Land mapping is not relevant.

The site will be managed on an ongoing basis and is therefore consistent with the definition of 'Managed land' in 'Planning for Bushfire' (2019). Future vegetation formation to the north and south of the site in the IPG master plan area will also be characterised by managed land, with riparian corridors to the east and west of the site. Significant managed land will be located between the core riparian zones and the site.

The BAR notes that no formal Asset Protection Zone (APZ) is required on-site, as the required APZ setbacks are entirely managed through future roads (to be delivered by IPG prior to the operation of the development) surrounding the site. Proposed landscaping on the site will be managed to APZ standards. Additionally, the entire site shall be managed to the standard of an Inner Protection Area APZ in accordance with Appendix 4 of *Planning for Bushfire Protection 2019*.

Most of the site and the proposed building will have a 'low' Bushfire Attack Level (BAL) rating. Accordingly, there are not any bushfire construction standard requirements applicable to the proposal. A BAL construction standard will therefore not be applied to the proposed development.

Vehicular access and water supply and utilities will be provided to the development in accordance with the relevant standards.

Overall, the BAR concludes that the proposed development meets the requirements of the regulatory framework in relation to bushfire risk management and that the proposal can comply with Planning for Bushfire Protection 2019 subject to the implementation of the following mitigation measures:

- The entire site shall be managed to the standard of an Inner Protection Area APZ in accordance with Appendix 4 of Planning for Bushfire Protection 2019
- A Bushfire Emergency Management and Evacuation Plan shall be prepared prior to occupation of the development

Land Contamination

The approved IPG Master Plan was informed by a Detailed Site Investigation (DSI) prepared by Senversa, which assessed the potential for land contamination across the IPG estate. The DSI concluded that, based on the previous remediation works and validation undertaken, the wider IPG estate (including the application site) is suitable for the commercial and industrial uses envisaged. However, the DSI noted that there remained potential for residual asbestos remains across the site and an Asbestos Management Plan (AMP) was therefore also prepared to inform the Master plan. The AMP includes an unexpected finds protocol that details the actions required to deal with asbestos should it be encountered during development.

Site clearance and bulk earthworks to establish the development pad for the site will be undertaken by IPG via a separate planning pathway (Complying Development Certificate) in advance of the proposed development and do not form part of this application. Any asbestos encountered during these works will

Issue (per SEARs)	Assessment
	therefore be remediated by IPG in accordance with the AMP prior to the commencement of the proposed development. Notwithstanding, a Targeted Site Investigation (TSI) (Appendix BB) has been prepared by Geosyntec specific to the site. The TSI is based on additional investigations completed prior to the site clearance and bulk earthworks to be undertaken by IPG via the CDC pathway. It identifies asbestos (comprising soil contamination and a surface fragment) in two locations in the southern part of the site, which will require remediation. Subject to the preparation and implementation of a Remedial Action Plan (RAP), the TSI concludes that the site is suitable for the proposed development, A RAP has therefore also been prepared by Geosyntec. The RAP identifies the preferred remediation option for the site as on-site treatment of surface fragments by hand picking and the removal of contaminated soil material to an approved site or facility. Validation will subsequently be undertaken by an Environmental Consultant to confirm that the site has been appropriately remediated and is suitable for the proposed use. The proposed remedial works will be undertaken by IPG in accordance with the RAP prior to the commencement of the proposed development. Accordingly, it is anticipated that any previous contamination on the site (as identified within the TSI) will have been appropriately remediated prior to the commencement of works.
Soils – Geotechnical	Report is currently being prepared. It will be available for final lodgement.
Agricultural – Land Use Conflict	A Land Use Conflict Risk Assessment (LUCRA) has been prepared to assess the potential for land use conflict to occur between the development and neighbouring land uses. It has been prepared in accordance with the <i>NSW Department of Primary Industries Land Use Conflict Risk Assessment Guide</i>. The land surrounding the wider IPG site is a mix of land undergoing urban transformation, irrigated plants and rural residential use. The under construction Western Sydney Airport site is to the west and north of the site. The zoning of the surrounding land anticipates a range of future employment generating uses which will be very different from the existing use. Whilst the land immediately adjoining the site is not in agricultural use, the following uses are located within its vicinity (0.6km – 1.1km to the south): ▪ Irrigated Plant use (Market Garden and vegetables in Controlled Environment Agriculture) located approximately 600m to the south on the western side of Badgerys Creek Rd. ▪ Irrigated Plant use (Vegetables in Controlled Environment Agriculture) located approximately 760m to the south on the western side of Badgerys Creek Road. ▪ Irrigated Plant use (Vegetables in Controlled Environment Agriculture) located approximately 800m to the south on the eastern side of Badgerys Creek Road. ▪ Irrigated Plant use (Market Garden and vegetables in Controlled Environment Agriculture) located approximately 870m to the south on the eastern side of Badgerys Creek Road ▪ Intensive Animal use (Poultry Farm) located approximately 1km to the south on the eastern side of Badgerys Creek Road. ▪ Irrigated Plant use (Vegetables in Controlled Environment Agriculture) located approximately 1.1km to the south of the site on the eastern side of Badgerys Creek Road.

Issue (per SEARs)	Assessment
	The LUCRA concludes that the proposed development will not result in land use conflict with the existing plant uses to the south given the significant distance between the properties and the site. The prevailing wind is from the south-west, and will therefore blow any construction phase dust away from the intensive plant uses. Additionally, the approved Aldi ADC to the south of the site will be located in between the site and the existing agricultural uses and will act as a significant physical buffer. This buffer will be enhanced in the future by the additional development envisioned by the IPG masterplan. Accordingly, these factors will negate any land use conflict and no mitigation is required. Cumulative impacts are also not anticipated given the likely redevelopment of the agricultural land in the future. The LUCRA also considers the potential for biosecurity impacts arising from the proposed development. It concludes that, for the same reasons summarised above, the proposed development will result in minimal biosecurity risks and a Biosecurity Management Plan is not necessary.
Aboriginal Cultural Heritage	An Addendum Aboriginal Cultural Heritage Assessment (ACHA) (Appendix FF) has been prepared by EcoLogical Australia. The addendum supplements the Aboriginal Cultural Heritage Assessment (ACHA) that was previously prepared by Ecological to support the approved IPG Master Plan. The Addendum provides an updated impact assessment specific to the proposed development. The Addendum ACHA notes that the site is situated within the Cumberland subregion of the NSW Sydney Basin bioregion of NSW between South Creek and Badgerys Creek, which are both high order systems that run south to north and feed into the Hawkesbury River. Minor tributaries of these waterways run to the east and west of the site and have been modified over time through landscape modifications, channelling, vegetation clearance and siltation from erosion. Native vegetation has been cleared like the rest of the Cumberland Plain. An updated Aboriginal Heritage Information Management Systems (AHIMS) search was undertaken in February 2026 to determine whether any registered Aboriginal sites were present within, or adjacent to, the site. The search identified one Aboriginal isolated artefact (AHIMS ID 45-5-2787) within the site, as well as 5 AHIMS sites within 200 metres of the site and 83 AHIMS sites within 2 kilometres. The isolated artefact (AHIMS ID 45-5-2787) comprised a silcrete flake on eroded ground water with low research potential. Ecological determined that the artefact was of low scientific significance as it was located within a disturbed context. An Aboriginal Heritage Impact Permit (AHIP) has been issued to IPG (in March 2026) for 15 years for the IPG Master Plan site. The AHIP approves the destruction of the Aboriginal isolated artefact (AHIMS ID 45-5-2787) on the site. Therefore, this artefact will not be impacted by the proposed development. Consultation with Registered Aboriginal Parties (RAP) was undertaken as part, and subsequent to the completion of, the ACHA for the IPG masterplan. The RAPs have also been provided with a copy of the AHIP. The addendum ACHA does not propose any changes to the findings or recommendations of the IPG Master Plan ACHA. No further assessment or approvals are required following implementation of the IPG AHIP. Harm to human remains is not permitted under the IPG AHIP. If suspected human skeletal remains are uncovered at any time throughout undertaking the proposed works, procedures outlined in Requirement 25 of the <i>Code of Practice for</i>

Issue (per SEARs)	Assessment
	<i>Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW 2010) would be followed.
Non-Aboriginal Heritage	An Addendum Historical Heritage Assessment (AHHA) (Appendix GG) has been prepared by EcoLogical Australia. There are not any heritage items located within one (1) kilometre of the study area. The Addendum confirms that there are two (2) heritage items located within two (2) kilometres of the study area. However, due to the distance between these heritage items and the site the proposed development will not directly (physically) impact their significant heritage values and is unlikely to impact the items indirectly (visually). Mitigation Measures The Historical Heritage Addendum recommends the implementation of an unexpected finds procedure during construction works. The unexpected finds procedure is as follows: Should any unexpected historical archaeology be uncovered during any future excavation works, the following procedure must be adhered to: ▪ Stop all work in the immediate area of the item and notify the Project Manager. ▪ Establish a 'no-go zone' around the item. Use high visibility fencing, where practical. Inform all site personnel about the no-go zone. ▪ No work is to be undertaken within this zone until further investigations are completed. ▪ Engage a suitably qualified and experienced Archaeologist to assess the finds. ▪ If the item is assessed as not a 'relic', a 'heritage item' or an 'Aboriginal object' by the Archaeologist, work can proceed with advice provided in writing. ▪ The Heritage Council must be notified if the finds are of local or state significance. Additional approvals will be required from Heritage NSW and additional recording or salvage before works can recommence on site.
Infrastructure Requirements	The IPG master plan was informed by a suite of civil infrastructure and utility assessments. These reports identified that local utilities in the vicinity of the masterplan site were historically established for rural and residential land use and require augmentation to support the development envisioned in the masterplan. The reports identified that servicing of the IPG estate required potable water augmentation and lead-in works, staged wastewater trunk and reticulation rollout, future recycle water servicing, electrical distribution through the precinct network and associated substation and feeder arrangements, and telecommunications reticulation. The staging of the IPG estate has been informed by the infrastructure required to unlock development rather than a single complete network from day one. The delivery of infrastructure to serve the IPG estate will be the responsibility of relevant agencies and IPG. In practical terms, the servicing hierarchy relevant to the proposed development is as follows: ▪ trunk and regional infrastructure delivered by the relevant authority or broader IPG estate servicing framework ▪ precinct reticulation and local service backbone delivered by IPG ▪ on-lot service lead-ins, internal reticulation and local coordination delivered as part of the proposed development.

The initial utilities infrastructure delivery within the precinct (to be delivered prior to the occupation of the proposed development) envisaged by the IPG masterplan includes:

- Stage 1:
 - zone substation to be delivered by Endeavour Energy in the south of the masterplan site;
 - Trunk sewer main to be delivered by Sydney Water (in a north-south alignment) to the west of the site. A sewer mains to service development sites will connect to the trunk main and be delivered by IPG.
 - 450mm Water Main located along Badgerys Creek to be extended and water mains to be delivered under Road 3
- Stage 2
 - Delivery of additional sewer mains by IPG, which will connect the site to the Trunk Sewer Main
 - Extension of electricity and water mains to the stage 2 boundary, including water mains beneath Road 2.

The estate road network will also be delivered by IPG and does not form part of the proposed development. Road 3 (as well as the associated roundabout at its interface with Badgerys Creek Road), which bounds the site to the south, will be delivered as part of the Stage 1 works prior to the proposed development. Road 2, which bounds the site to the east, west and north, will be delivered in Stage 2 and prior to the first occupation of the proposed development.

Potable water

Feasibility advice previously provided to IPG confirms that the existing 450mm Water Main located along Badgerys Creek Road has the capacity to serve the proposed development. The potable water network will be extended to serve the initial phases of the IPG masterplan as detailed above. Detailed Sydney Water servicing work for this has already commenced.

The proposed development will utilise the precinct potable water framework via a connection from Road 03 to the south. The anticipated total potable water demand for the proposed development is 80.84 kL per day. Once recycled water is made available and utilised for non-potable demands, the potable water demand is expected to reduce to 56.823 kL per day.

Potable water demand will be minimised through the incorporation of appropriate fixtures and controls, and efficient irrigation practices.

Recycled and non-potable water

There is currently no existing recycled water infrastructure within the vicinity of the site. However, future recycled water servicing is expected to be delivered by Sydney Water from the Upper South Creek Advanced Water Recycling Centre, with recycled water pipes reticulated throughout the IPG estate.

Consistent with Sydney Water's servicing advice, stormwater harvested within the regional basin system is to be treated and reused across the precinct for non-drinking water purposes. Localised rainwater reuse is not the primary servicing basis for the Site.

Prior to the establishment of the treated stormwater and / or recycled wastewater supply from the Advanced Water Recycling Centre the IPG estate recycled water

reticulation network will be supplied by the adjacent potable water reticulation network.

The anticipated recycled water demand for the proposed development is 26.913 kL per day. Once the future recycled water servicing has been established, the potable water demand will be reduced to 53.823 kL per day.

Wastewater

Most of the IPG estate is located within the Badgerys Creek Stage 2 wastewater catchment. Sydney Water have previously stated that trunk wastewater for this catchment will be delivered by the end of 2028. Estate lead-in mains and reticulation mains will be delivered as required by IPG.

The proposed development will utilise the precinct wastewater framework via two sewer connections (located to the north and east of the site). AT&L anticipate that the proposed development will generate a wastewater demand of 76.70 kL per day.

Electricity

A new zone substation will be delivered as part of the Stage 1 development (i.e. prior to the proposed development) to serve the IPG estate. Electricity mains will be extended to the site boundary by IPG.

The proposed development will utilise the estate electrical framework via a connection from Road 03. The proposal includes a site substation in the south wester corner and will provide the internal electrical servicing distribution required for the building.

Telecommunications

Telecommunications will be provided through the estate network and co-ordinated with the broader road and utility corridors being delivered by IPG. The proposed development will utilise the estate communications framework via a connection from Road 03 in front of the ancillary office. The proposed development will include the required communications conduits, pit and internal distribution.

Biodiversity

A Biodiversity Certification Report (**BCR**) (Appendix R) has been prepared by Ecological Australia. The report confirms that the site is bio-certified land under section 8.2 of the *Biodiversity Conservation Act 2016* (**BC Act**). Accordingly, there is no requirement for additional biodiversity assessment under the BC Act.

Additionally, the site is located within an area that was subject to a Strategic Assessment under the Commonwealth EPBC Act 1999. Provided development is undertaken in accordance with the Growth Centres Program (which includes the NSW Biodiversity certification noted above) no further assessment is required under the EPBC Act.

Several ecological technical studies were previously undertaken to inform the IPG Master plan, including (but not limited to) a Biodiversity Assessment Report and Wildlife Hazard Assessment. Site clearance and bulk earthworks across the site will also be undertaken separately by IPG (approved via a separate planning pathway).

The BCR notes that the proposed landscaping will be compliant with the landscaping requirements of the Master Plan. Accordingly, an additional Wildlife Hazard Assessment or Wildlife Management Plan is not required. Notwithstanding, the following mitigation measures set out within the IPG Wildlife Management Plan remain relevant to the proposed development:

- Site or building managers are responsible for implementing training and inducting all staff; ensuring passive management actions are undertaken;

Issue (per SEARs)	Assessment
	and notifying the operator, site ecologist and relevant agencies (including DPHI and Western Sydney Airport) of hazards and risks as they arise. Passive management actions relate to grass management; natural food supply management; food waste management; and other waste management All staff, contractors and visitors will be responsible for notifying the site / building manager of a management need or risk and maintaining familiarity with the requirement of the Wildlife Hazard Assessment prepared for the Master Plan and the induction process.
Social Impacts	A Social Impact Assessment (SIA) (Appendix HH) has been prepared by Urbis. The report analyses the potential positive and negative social impacts associated with the proposal. This involves a detailed study to scope the potential social impacts, identify appropriate mitigation measures and provide recommendations aligned with professional standards and statutory requirements. The SIA was prepared in accordance with a SIA social baseline, field study, impact scoping and assessment. The SIA identifies low negative social impacts in relation to 'Accessibility' (i.e. increased traffic on the local road network during construction and operation) and 'Health and wellbeing' (i.e. contributions to the urban heat island effect). Notwithstanding, several positive social impacts (ranging from low positive to high positive) are also identified, including in relation to 'Way of life'; 'Culture'; 'Surroundings' and 'Decision making-systems'. Additional measures that could be implemented to enhance positive impacts further and mitigate negative impacts are identified in the SIA and will be considered by the proponent.
Planning Agreement / Development Contributions	The Liverpool Aerotropolis Section 7.12 Contributions Plan (CP) applies to the site. This is a contemporary contributions framework that has been specifically prepared to align with the Western Sydney Aerotropolis Precinct Plan (WSAPP) and facilitate development within the precinct. The CP funds a range of infrastructure items of local significance, including collector roads, culverts, active transport links, and passive and active open space. In this regard, the CP establishes a clear mechanism for funding local infrastructure required to support development within the precinct and addresses the requirements of Clause 66 of the EP&A Regulation 2021, enabling development consent to be granted for the site. In addition to the CP, it is understood IPG is currently negotiating a local Planning Agreement with Liverpool City Council for the delivery of infrastructure identified under the CP, having regard to amendments introduced through the IPG master plan. It is understood that the Planning Agreement will be finalised prior to the issue of a Construction Certificate for the proposed development. Should this not occur, contributions toward the required local infrastructure would instead be payable in accordance with the applicable rates and requirements of the CP. Regional infrastructure servicing the site is funded through the SIC regime and the Sydney Infrastructure Opportunities Plan (IOP) under the Housing and Productivity Contributions (HPC) framework. As the development application is anticipated to be lodged prior to 1 July 2026, it is understood that the development will be conditioned to pay contributions under the SIC regime, thereby contributing toward the delivery of regional infrastructure required to support growth within the Aerotropolis precincts.
BCA and Access	BMG has prepared a Building Code of Australia 2022 Capability Statement (Appendix K) which assesses the proposed development against the relevant provisions of the National Construction Code 2022, Volume 1, Building Code of Australia, BCA Class 2 to 9 Buildings (BCA). The report identifies several detailed

Issue (per SEARs)	Assessment
	construction design matters that require further resolution via performance solutions or other means prior to the relevant construction certificate stage. Notwithstanding, the proposed development can readily achieve compliance with the BCA.
Fire Safety Strategy	A Fire Safety Engineering Statement (FSES) has been prepared by Innova Services Australia (Appendix OO). The FSES has assessed the proposed development against the relevant provisions of the NCC and applicable Australian Standards. The FSES concludes that the proposed development is suitable subject to the implementation of the following mitigation measures: ▪ The development is to be designed and constructed generally in accordance with the Fire Safety Strategy and Fire Safety Concept Strategy prepared for the IPG Master plan, ensuring no adverse impact on their findings, assumptions or recommendations. ▪ Fire safety systems, including egress provisions, fire-fighting equipment, smoke hazard management and warning systems, are to be detailed at subsequent design stages to demonstrate compliance with the Performance Requirements of the NCC. ▪ Fire brigade access and servicing arrangements, including perimeter access, hardstands and booster locations, are to be provided to facilitate effective Fire and Rescue NSW intervention. ▪ The fire hydrant system is to be designed with capacity exceeding minimum DtS requirements. ▪ Detailed fire engineering analysis and certification is to be undertaken prior to construction, in consultation with the Principal Certifier and Fire & Rescue NSW, as required. ▪ Ongoing inspection, testing, maintenance and building management procedures are to be implemented to ensure the continued effectiveness of fire safety measures.

7 Justification of the Project

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development. It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1 Project Design

The proposed development is located on land identified for future employment use within the Western Parkland City SEPP 2021 and the Western Sydney Aerotropolis Precinct Plan. It is located within the wider IPG estate, which is the subject of an approved Master Plan. The Master Plan was subject to an extensive co-design process with an appointed Technical Assurance Panel.

The Master Plan sets out the site-specific vision and objectives consistent with the Western Sydney Aerotropolis planning framework. It responds to the existing and future context, the strategic planning context, technical studies, and input from relevant stakeholders.

The proposed development will deliver a high-quality and contemporary automated distribution centre on the site, which is fully consistent with the Master plan vision and relevant design principles. Generous landscaping will be provided across the site, softening the appearance of the building and enhancing amenity.

The proposed development is consistent with the relevant impact benchmarks established within the Master Plan. Where required, mitigation measures have been proposed to ensure that the proposal can be constructed and operate without creating unreasonable impacts.

7.2 Strategic Planning Consistency

The proposal is consistent with the strategic planning context established within the Western Parkland City SEPP and the Western Sydney Aerotropolis Precinct Plan. The project also aligns with the wider strategic context set by the Region Plan and District Plan, as evidenced in Section 2.

The proposed development will deliver an employment generating land use in close proximity to Western Sydney Airport, creating a significant number of new jobs and various other benefits to the local and regional economy.

Relevant strategic policies have been thoroughly considered as required by the SEARs and detailed in Section 2 of this EIS. The site is deemed strategically suitable for the proposal.

7.3 Statutory Planning Consistency

The relevant State and local environmental planning instruments are listed in Section 4 and assessed in Appendix B. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised in Table 35.

Table 34 Statutory Planning Consistency

Matter	Consistency
Objects of Act – EP&A Act s1.3	The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act and addressed in Appendix B
Evaluation of development	The proposed development has been evaluated in accordance the relevant matters for consideration under s4.15(1) of the EP&A Act as outlined in Appendix B.

Matter	Consistency
application (s4.15) – EP&A Act s4.40	The project is generally consistent with the requirements of the relevant EPI's and DCP. As outlined in Appendix C, the project has addressed the Benchmark Solutions outlined in Aerotropolis DCP or the Alternative Solutions set out within the IPG Master Plan. It also addresses the Additional Controls established within the Master Plan. Where the proposed development is unable to meet the Benchmark Solutions / Alternative Solutions / Additional Controls, reasonable alternatives have been proposed which meet the relevant performance outcome and objectives of the controls or achieve an equal or superior design outcome.
Compliance with environmental assessment requirements – EP&A Regulation s.191	This EIS has addressed all matters identified in the SEARs as outlined in Appendix A.
Principles of Ecologically Sustainable Development – EP&A Regulation s.193	
The precautionary principle	The precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. The site is recognised as bio-certified urban capable land under the Section 8.2 of the BC Act. This EIS has not identified any serious threats of environmental damage that cannot be adequately mitigated or addressed based on current scientific standards and best practices. In this regard, the proposed development can be considered generally consistent with the precautionary principle.
Inter-generational equity	This principle requires states that the needs of future generations are to be considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The proposed development is consistent with this principle as it will create a significant amount of new local job opportunities during both the construction and operational phases and will deliver a high quality and contemporary warehouse facility that incorporates a range of sustainability principles to minimise its environmental impact and resilience to climate change. Where required, mitigation measures will be implemented to ensure that environmental values are preserved and enhanced for future generations as a result of the development.
Conservation of biological diversity and ecological integrity	As demonstrated in Section 6 and throughout the EIS, the proposed development will not result in any significant impacts on the biological and ecological integrity of surrounding land, subject to the implementation of mitigation measures. The proposed integrated landscaping approach and stormwater runoff, which is consistent with the approved Master plan approach, will facilitate a development that will conserve and support local ecological diversity and integrity.
Improved valuation, pricing and incentive mechanisms	This requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation. The development will not have any unacceptable environmental impacts in relation to air quality, water quality or waste management. The effects of the

Matter	Consistency
	development will be acceptable and managed accordingly by the proposed mitigation measures as required

7.4 Community Views

Community and stakeholder engagement has been undertaken in the preparation of the SSDA. This included direct engagement and consultation with:

- Adjoining landowners and occupants.
- Government, agency, utility services and other key stakeholders.

This engagement was consistent with the community participation objectives in the Undertaking Engagement Guidelines for State Significant Projects and complied with the community engagement requirements.

Feedback obtained by Government, agencies and utility stakeholders have been incorporated into the design and assessment in the EIS where relevant. No community feedback had been provided at the time of preparing the EIS, however, if any concern is raised this will continue to be addressed via further consultation and engagement through the assessment process

7.5 Environmental Impacts

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined in Table 36.

Table 35 Environmental Impact Summary

Matter	Summary
Impacts on the natural environment	The proposal addresses the principles of ecologically sustainable development (ESD) in accordance with the requirements at Clause 194 of the Regulations. The impacts of the proposed development are generally consistent with those contemplated under the approved IPG Master Plan. Mitigation measures will be implemented where required to minimise any adverse impacts on the environment.
Impacts on the built environment	The proposed development comprises a contemporary industrial building, which is fully consistent with the site's emerging context, including the vision and principles set out within the approved IPG Master Plan. The scale, form and massing of the proposed development fully align with the Master Plan vision. Estate wide infrastructure required to service the proposed development will be delivered prior to first occupation by IPG, with on-lot connections provided as part of the proposal. Accordingly, any impacts on the built environment are acceptable and the proposal will facilitate the orderly development of the land.
Social impacts	The proposed development will create a range of positive social impacts as it will contribute to long-term employment generation and will reinstate the industry specific skills, knowledge and capacity associated with warehouse and logistic centres within NSW.
Economic impacts	The proposed development will create significant economic benefits by creating new construction and operational phase jobs. It will also contribute to the

Matter	Summary
	establishment of an warehouse and logistics estate in close proximity to the Western Sydney Airport.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within Section 6 and as summarised in Appendix F to this EIS.

7.6 Suitability of the Site

The site is considered highly suitable for the proposed development for the following reasons:

- The site is located within close vicinity to the new Western Sydney Airport and is located on land zoned ENT Enterprise. The proposed warehouse land use is permissible in the Enterprise Zone. The development aligns with the zone objectives as outlined in the Precincts SEPP.
- The site forms part of the IPG estate, which is subject to an approved Master Plan. The approved Master Plan includes a vision for contemporary industrial uses including large warehouse buildings across the wider site and includes a servicing strategy that demonstrates the ability to service the site.
- The site is located close to the state and regional road network. Part of the future Eastern Ring Road will be constructed within the IPG estate and in close proximity to the proposed development.
- Bulk earthworks and other civil works required to establish a development pad on the site suitable for a warehouse or distribution centre building have been approved via a separate planning pathway and are anticipated to commence shortly.
- Asbestos fragments identified on the site will be remediated in accordance with the RAP. Subject to the implementation of the RAP, the site is suitable for the proposed development from a contamination perspective.
- The detailed impact assessment demonstrates that the proposed development can proceed without any unacceptable environmental impact, provided the relevant management/mitigation measures are implemented.
- The site can manage, mitigate and avoid all known environmental constraints on the site and surrounding land including impacts to the 24/7 operation of the new WSIA.

7.7 Public Interest

The proposed development is considered in the public interest for the following reasons:

- The IPG Master Plan sets out the site-specific vision and objectives consistent with the Western Sydney Aerotropolis (Aerotropolis) planning framework. The proposed design outcome is a response to the existing and future context, the strategic planning context, technical studies, and input from related stakeholders. The Master Plan was developed through a co-design process as part of the Aerotropolis Technical Assurance Panel, and the proposed development is wholly anticipated as part of that process.
- The proposal will deliver substantial public benefits by facilitating the development of a warehouse or distribution centre directly opposite Western Sydney International Airport. This strategic positioning will provide crucial support to the operational efficiency of Western Sydney Airport. The proposal will make a significant contribution to the establishment of the Western Sydney Aerotropolis as envisioned within the statutory and strategic planning framework.
- The proposed development will create a significant amount of construction phase and operational phase jobs.
- The applicant has taken a proactive approach to stakeholder and agency engagement, ensuring that all concerns raised have been addressed in the project's design where feasible and practicable. This

commitment to collaboration and transparency with agencies underpins the applicant's approach to shaping the future of our cities and communities and the Western Sydney Aerotropolis.

- No adverse environmental, social or economic impacts will result from the proposal, given the use is compatible with adjacent future land uses. Subject to the various mitigation measures recommended by the specialist consultants, the proposed development will not have any unreasonable impacts during construction and ongoing operation.

Disclaimer

This report is dated June 2026 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Urbis Ltd (**Instructing Party**) for the purpose of Environmental Impact Statement (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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for a better future.**

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