

Submissions Report

State Significant Development Application (SSD 25452459)

First Building – Bradfield City Centre
Advanced Manufacturing Research Facility
215 Badgerys Creek Road, Bringelly



Prepared for the Western Parkland City Authority
Submitted to the Department of Planning and Environment

September 2022

Certification

Authors

Name	Michael Woodland
Qualifications	BTP NSW MPIA
Name	Kane Winwood
Qualifications	B Eng (Civil & Env), MEIANZ
Address	43A The Corso Manly NSW 2095

Proposed development

Applicant	Western Parkland City Authority
Applicant's address	10 Valentine Ave, Parramatta NSW 2150
Land to be developed	215 Badgerys Creek Road, Bringelly
Legal description	Part Lot 101 in DP 1282949
Project description	The Application seeks consent for construction, fitout and use of the proposed First Building as an advanced manufacturing research and development facility, including site preparation works, site access and parking, utilities infrastructure, landscaping/ public domain, signage, and other ancillary works.

Declaration

We certify that the contents of this Submissions Report has been prepared in accordance with the requirements of clauses 6 and 7 of Schedule 2 of *Environmental Planning and Assessment Regulation 2000*; contains all available information that is relevant to the assessment of the development and that to the best of our knowledge the information contained in this report is neither false nor misleading.



Kane Winwood BEng (Civil & Env) MEIANZ
Principal Planner
KEYLAN Consulting Pty Ltd



Michael Woodland BTP MPIA
Director
KEYLAN Consulting Pty Ltd

Cover image: First Building, Bradfield – Eastern Elevation (Source: Hassell)

All Rights Reserved. No material may be reproduced without prior permission of KEYLAN Consulting Pty Ltd. While KEYLAN Consulting Pty Ltd working on this project has tried to ensure the accuracy of the information in this publication, it accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in the information in this report. This report has relied on information provided by Western Parkland City Authority in good faith and accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in the information in this report.

Revision	Prepared by	Approved by	Date approved	Revision Type
1	KW	MW	13/5/2022	Draft
2	KW	MW	8/9/2022	Final

Table of Contents

1	Introduction	4
2	Analysis of Submissions	5
2.1	Submissions Summary	5
3	Actions taken since exhibition.....	7
3.1	Sydney Metro - Western Sydney Airport.....	8
3.2	Land Use Zones.....	8
3.3	Visual Impact Assessment.....	11
4	Updated Project Justification	12

Appendices

Appendix A	Response to submissions
Appendix B	Updated mitigation measures
Appendix C	Updated Architectural Package
Appendix D	State Design Review Panel 1
Appendix E	State Design Review Panel 2
Appendix F	Western Sydney Aerotropolis DCP Phase 2
Appendix G	Landscape Design Plans
Appendix H	Visual Impact Assessment
Appendix I	Updated civil design plans
Appendix J	Transport Response
Appendix K	Construction Noise and Vibration Impact Assessment
Appendix L	Operational Noise and Vibration Impact Assessment
Appendix M	Environmental Sustainability Design Report
Appendix N	Statement of Heritage Impact
Appendix O	Air Quality Impact Assessment
Appendix P	Aborist Report
Appendix Q	Detailed Site Investigation and Site Auditor response
Appendix R	Stormwater modelling response
Appendix S	<i>Western Sydney Aerotropolis Plan 2020</i> Section 5 Analysis
Appendix T	Response to <i>Western Sydney Aerotropolis Precinct Plan 2022</i>
Appendix U	Flooding advice
Appendix V	Plan of Subdivision
Appendix W	Aboriginal Heritage Assessment Memorandum
Appendix X	Security Risk Assessment

1 Introduction

This Submissions Report has been prepared by Keylan Consulting Pty Ltd (Keylan) on behalf of the Western Parkland City Authority (WPCA, the Applicant) to support a State significant development (SSD) application for the construction, fit out and use of the First Building within the Western Sydney Aerotropolis.

The report is submitted following the public exhibition of the Environmental Impact Statement (EIS) for the First Building between 19 November and 16 December 2021. The First Building is located to the southeast of the Western Sydney International (Nancy-Bird Walton) Airport, at 215 Badgerys Creek Road, Bringelly in the Liverpool local government area (LGA). The 3.63 hectares (ha) site is legally described as Part Lot 101 in DP 1282949.

The site forms part of the larger 114.6 ha Bradfield City Centre site within the Western Parkland City, specifically within the Aerotropolis Core Precinct of the Western Sydney Aerotropolis, under the *State Environmental Planning Policy (Precincts—Western Parkland City) 2021* (Western Parkland City Precincts SEPP) which repealed the *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020* (Aerotropolis SEPP).

The SSD application (SSD 25452459) and supporting EIS sought approval for an advanced manufacturing research, development and training facility (AMRF) to support the development of an advanced manufacturing sector and the requisite workforce skills within the emerging Western Sydney Aerotropolis.

Key components of the development include:

- proposed building height of 16.7 m
- combined gross floor area (GFA) of approximately 3,061 square metres (m²), including approximately 1,111 m² GFA of manufacturing space and 1,254 m² GFA of office and meeting space
- provision of 50 parking spaces
- landscaping of resilient native and endemic species
- incorporation of ESD principles to support a green city & address climate change
- use of facility as an advanced manufacturing research facility
- use of facility as an office space
- ancillary use of facility as a function centre
- provision of public and private domain upgrades

The SSD application and supporting EIS were lodged with the Department of Planning and Environment (DPE) in November 2021.

While the Applicant anticipates that the facility will generally operate during standard office hours, the application seeks approval for operation of the development on a 24 hour basis. This is to enable flexibility in circumstances where overnight activities are required, particularly in the manufacturing spaces. As noted in the Operational Noise and Vibration Assessment (Appendix L), the night time operations are predicted to comply with the relevant noise assessment criteria during the night time period.

2 Analysis of Submissions

2.1 Submissions Summary

A total of 13 submissions were made on the proposed development, including eight submissions from public authorities and five submissions from the public and organisations. None of the submissions object to the application. Two submissions were received from members of the public. One regional submission (Cabramatta) in support and the other local submission (Bringelly) providing comments.

Given the small number of submissions made on the application, a response to each of the agency submissions is provided in Appendix A.

A breakdown of the submissions is provided in the following sections.

2.1.1 State and Commonwealth Agency Submissions

Eight submissions were received from the following public authorities, none of which object to the proposal:

- Liverpool City Council
- Heritage NSW
- Heritage Council of NSW
- Environment, Energy and Science Group in the Department of Planning, Industry and Environment (DPIE)
- Transport for NSW
- Western Sydney Planning Partnership
- Sydney Water
- NSW Rural Fire Service (RFS)

The DPE also wrote to the Applicant raising additional matters to be addressed in the Submissions Report, including a request to address correspondence from the NSW Government Architect in relation to the State Design Review Panel (SDRP).

The key matters raised in the public agency submissions primarily related to:

- infrastructure and servicing
- urban design and visual impacts
- consistency with strategic plans
- construction programming and timing with the Sydney Metro project construction
- sustainability
- traffic and parking
- landscaping and biodiversity
- water
- noise
- air quality
- heritage

Detailed responses to the agency submissions are provided in Appendix A.

2.1.2 Organisation and Individual Submissions

A total of five submissions were received from organisations and individuals. The three organisations that made a submission on the application were:

- Endeavour Energy
- Civil Aviation Safety Authority (CASA) Aviation Group, Air Navigation, Airspace and Aerodromes Branch
- Western Sydney Airport Corporation (WSA)

The key matters raised in the organisation submissions primarily related to:

- Design requirements for the padmount substation (Endeavour Energy)
- Wildlife attraction requirements influencing landscaping, wildlife management and waste management during operation of the development (WSA)
- Confirmation about the duration of temporary stormwater infrastructure (WSA)

Detailed responses to the organisation submissions are provided in Appendix A, with further detail provided in supporting appendices to this report.

The two public submissions both provided the same comments about future road design, alignment and levels. In particular, the submissions sought to ensure future connectivity with properties along Badgerys Creek Road to the west of the project site.

We note that this issue is not within the scope of the First Building development application as the proposed access road to the First Building is a private access within land owned by the Applicant.

Future development of the public roads servicing the Bradfield City Centre and connections with surrounding lands is a matter for consideration under the Bradfield Precinct Masterplan, which is currently in development.

3 Actions taken since exhibition

3.1 Design development

Since the exhibition of the EIS for the proposed development, the Applicant has continued developing the design of the proposal including updated architectural plans, civil designs and landscape designs in support of the Applicant's tender process for the construction of the development.

Key activities since the EIS exhibition include:

- the Applicant presented its updated architectural designs to the second SDRP meeting on 13 December 2021 (Appendix E), in response to the first meeting of the SDRP in October 2021 (presentation is provided in Appendix D).
- updated architectural plans for the tender package (Appendix C)
- preparation of updated Landscape Plans for the tender package (Appendix G)
- preparation of updated civil designs, including stormwater designs supported by MUSIC modelling, for the tender package (Appendix I)
- completion of the Detailed Site Investigation (DSI) based on the recommendations of the Preliminary Site Investigation, to understand the likelihood and extent of potential contamination at the site. A copy of the DSI report is provided in Appendix Q
- preparation of a visual impact assessment based on the key vantage points to the east and west of the development, including the Kelvin Homestead and Church of the Holy Innocents
- subdivision of the land to excise the roundabout on Badgerys Creek Road, constructed as part of the Sydney Metro – Western Sydney Airport project (Appendix V).
- preparation of a Security Risk Assessment in consultation with Transport for NSW

The Applicant has also provided the following information in response to comments made in submissions:

- updated Construction (Appendix K) and Operation (Appendix L) Noise and Vibration Impact Assessments
- Environmental Sustainability Design Report (Appendix M)
- Statement of Heritage Impact to address visual impacts on the two heritage items (Appendix N)
- updated Air Quality Impact Assessment (Appendix O)
- Arboricultural Assessment (Appendix P)
- stormwater modelling information (Appendix R)
- confirmation that the Aboriginal heritage assessment has fulfilled the assessment requirements and was completed in accordance with the relevant guidelines (Appendix W)

Additionally, the DPE has finalised the Western Sydney Aerotropolis Precinct Plan since the exhibition of the EIS and an updated review against the final plan is provided in Appendix T.

3.2 Sydney Metro - Western Sydney Airport

Since the preparation of the EIS for the proposal, construction has commenced on the Sydney Metro – Western Sydney Airport, including the construction of the intersection with Badgerys Creek Road and the construction access road to the station construction site.

The roundabout at the intersection with Badgerys Creek Road has been constructed, as shown in the aerial image provided in Figure 1.



Figure 1: Badgerys Creek Road Roundabout (Source: WPCA)

As noted above, the former Lot 10 in DP 1235662 was subdivided to excise the roundabout from the land and incorporate the roundabout into the road reserve. The registered plan of subdivision is included in Appendix V for information.

3.3 Land Use Zones

As noted in Section 1, the Aerotropolis SEPP has become part of the Western Parkland City Precincts SEPP, which was gazetted on 1 March 2022.

The AMRF First Building site is located within the MU Mixed Use Zone, with portions of the development within the ENT Enterprise zone and a small component of the access road intersecting the ENZ Environment and Recreation Zone (Figure 2 and Figure 3).

The proposed building meets the definition of a “high technology industry” pursuant to the Standard Instrument and is permissible with consent in the Mixed Use Zone.

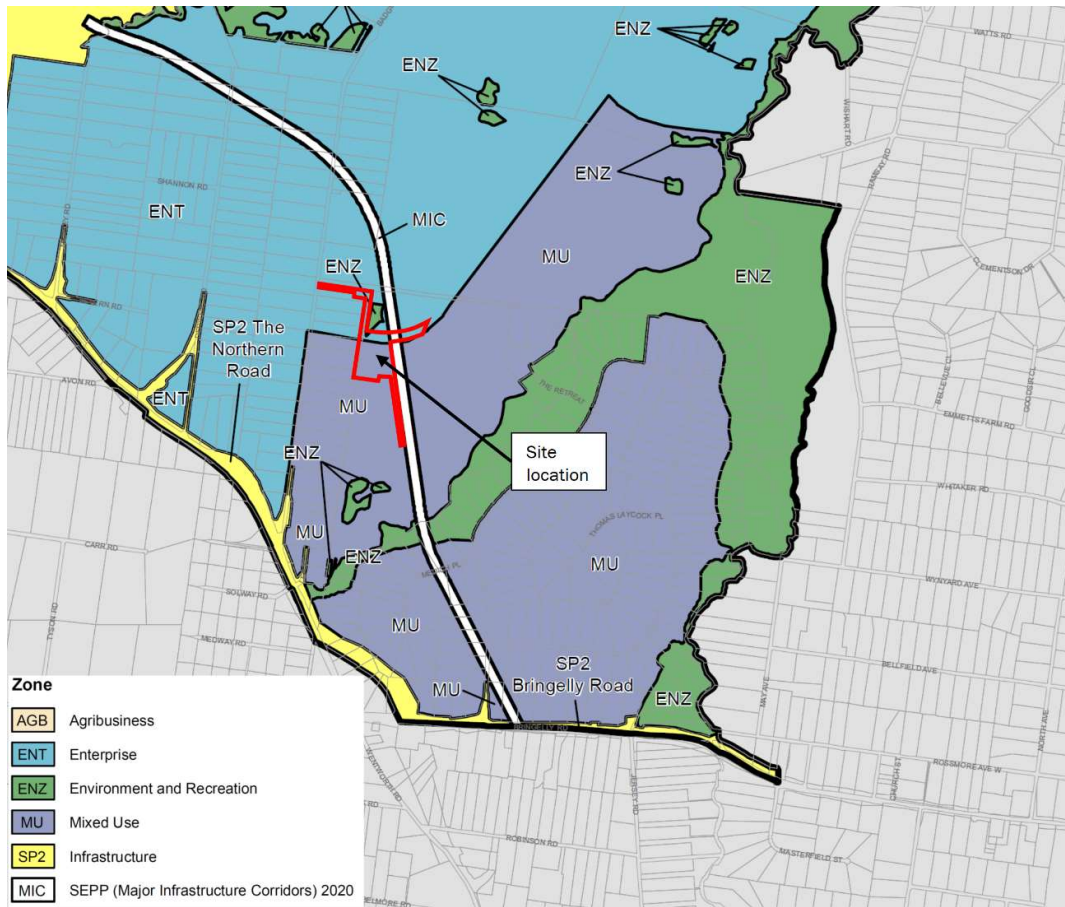


Figure 2: Land use zones (Western Parkland City Precincts SEPP)

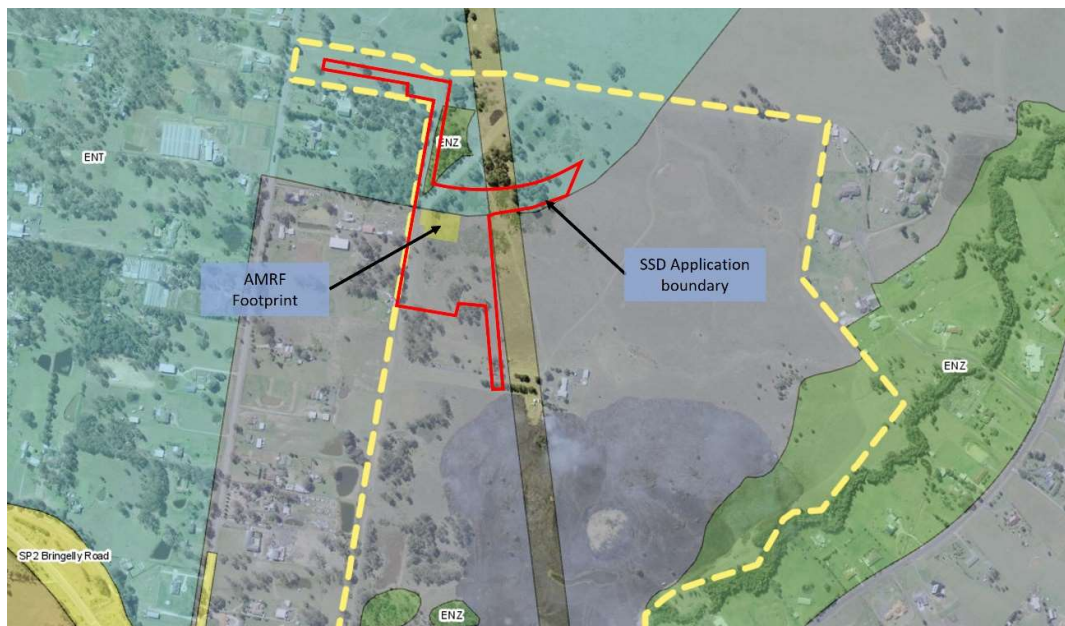


Figure 3: Land use zones (source: ePlanning Spatial Viewer)

Consideration of the applicable land use zones is provided in Table 1.

Zone	Discussion
MU – Mixed Use	<p>The objectives of the MU zone are:</p> <ul style="list-style-type: none"> <i>To integrate a mixture of compatible land uses in accessible locations.</i> <i>To promote business, office, retail, entertainment and tourist uses.</i> <i>To promote a high standard of public amenity and convenient urban living.</i> <i>To provide for residential and other accommodation that includes active non-residential uses at street level.</i> <i>To ensure an appropriate transition from non-urban land uses and environmental conservation areas in surrounding areas to urban land uses in the zone.</i> <p>The proposal is consistent with the zone objectives of the MU zone as it provides for a land-use that promotes business uses and is compatible with the emerging city.</p> <p>The high technology industry will incorporate a high standard of public amenity through a building design which has been subjected to a design review panel process, with landscaping using species endemic to the Cumberland plain.</p>
ENT - Enterprise	<p>The proposed development in the ENT zone comprises access roads to the AMRF site and roads are permissible with consent in the ENT zone.</p>
ENZ – Environment and Recreation	<p>Under the Western Parkland City Precincts SEPP, the Environment and Recreation Zone (ENZ) boundary extends into a portion of the First Building interim access road and the planned alignment of 15th Avenue under the Western Parkland City Precincts SEPP (Figure 3). The ENZ area was not included in the Aerotropolis SEPP and was introduced by the Western Parkland City Precincts SEPP.</p> <p>The originally proposed development within the ENZ zone for the AMRF comprised a temporary construction access road (shown blue in Figure 4), which is consistent with the intended alignment of 15th Avenue under the Masterplan (pale green in Figure 4). Roads are permissible with consent and high technology industry is prohibited in the ENZ zone.</p> <p>Corresponding with the ENZ zone boundary is an area marked “High Biodiversity Value.” Under clause 4.25A of the SEPP, clearing of native vegetation is not permitted in the areas marked High Biodiversity Value Area.</p> <p>However, under the savings and transitional provisions of clause 4.51 of the Western Parkland City Precincts SEPP, this restriction does not apply to the application as it was lodged prior to the commencement of the new SEPP</p>

Table 1: Land Use Zones - Western Parkland City Precincts SEPP



Figure 4: ENZ zone in relation to the development

3.4 Visual Impact Assessment

A Visual Impact Assessment (VIA) has been prepared for the proposed development and is provided in Appendix H. Following a detailed analysis of the proposal and the surrounding locality, the VIA has found that, during the short term, the visual impacts of the AMRF can be categorised as Negligible to Minor at all surrounding receivers, with the exception of the following:

175 Badgerys Creek Road – High
145 Badgerys Creek Road – Moderate

To reduce impacts on these receivers, the Applicant proposes to approach the landowners prior to and during construction of the development to resolve interim visual impacts through the use of visual screening, if requested by the landowner.

Other findings of the VIA include:

- the proposed will result in minor visual impacts on the Kelvin Homestead during the interim stages of the Bradfield City Centre development, however as the city progresses it lessens to negligible impacts
- no visual impacts are predicted for the Church of Holy Innocents as it is approximately 4 km from the site

The VIA found that the future context of the Bradfield City Centre will provide an urban environment consisting of higher building heights and larger built forms that the AMRF will exist within. During the interim stages of developing the Bradfield City Centre, visual impacts will be felt by surrounding receivers, however as the city expands and these lands are developed consistent with the WSAP 2020, visual impacts of the AMRF First Building will subside.

4 Updated Project Justification

The EIS concluded that the development is justified on the basis that the AMRF is consistent with the Greater Sydney Commission (now Greater Cities Commission) Strategic Plans, the Western District Plan, The Western Sydney Aerotropolis Precinct Plan, the Western Parkland Precincts SEPP and Western Sydney Aerotropolis DCP.

Further, the EIS demonstrated the development has strategic merit as it is consistent with the aims and objectives of the relevant strategic plans that apply to the site. A subsequent review of the updated plans and strategies following exhibition of the EIS supports these conclusions.

The development will strengthen opportunities in the Western Sydney Parklands and provide the first building in the Aerotropolis Core.

The AMRF will be the first building within the Aerotropolis to spark future growth within the emerging city. Over the next 10 years, development will support this growth. The AMRF will be the first step in realising the strategic vision for the Western Parkland City.

The AMRF will support the development of the advanced manufacturing sector within the Western Sydney Aerotropolis by housing shared high-tech manufacturing equipment for research and development. Specialised equipment and machinery not normally accessible to individual enterprise will be accommodated within the First Building and made available to a broad range of users to fast-track innovation and business development.

The development is therefore considered to be in the public interest and warrants approval.

Appendix A

Submissions Response Table

Appendix B

Updated Mitigation Measures

Appendix C

Updated Architectural Package

Appendix D

Presentation to State Design Review Panel 1

Appendix E

Presentation to State Design Review Panel 2

Appendix F

Western Sydney Aerotropolis DCP Phase 2

Appendix G

Landscape Design Plans

Appendix H

Visual Impact Assessment

Appendix I

Updated Civil Design Plans

Appendix J

Transport Response

Appendix K

Construction Noise and Vibration Impact Assessment

Appendix L

Operational Noise and Vibration Impact Assessment

Appendix M

Environmental Sustainability Design Report

Appendix N

Statement of Heritage Impact

Appendix O

Air Quality Impact Assessment

Appendix P

Aborist Report

Appendix Q

Detailed Site Investigation

Appendix R

Stormwater Modelling Response

Appendix S

Section 5 (Safeguarding the 24-hour airport) of the Western Sydney Aerotropolis Plan

Appendix T

Response to Western Sydney Aerotropolis Precinct Plan 2022

Appendix U

Flooding Response

Appendix V

Plan of Subdivision

Appendix W

Aboriginal Heritage Assessment Memorandum