

230 Martin Road, Badgerys Creek

Environmental Impact Statement

April 2026

Prepared for: EMKC3 PTY LTD



Urbis staff responsible for this report were:

Director	Christophe Charkos
Associate Director	Travis Lythall
Senior Consultant	Michael Beale
Consultant	Taylah Brito
Project Code	P0048273
Report Number	FINAL

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.

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EIS Declaration

Project Details		
Project name	230 Martin Road	
Application number	SSD-65529236	
Address	230 Martin Road, Badgerys Creek, New South Wales	
Applicant details		
Applicant name	EMKC ³ Pty Ltd	
Applicant address	Level 11, 37 York Street, Sydney, NSW, 2000	
Details of person(s) by whom this EIS was prepared		
Name	Travis Lythall Associate Director	Taylah Brito Consultant
Qualification	Bachelor of Science (UoN)	MA Urban and Regional Planning (University of Westminster, UK) Bachelor of Arts - Geography (University of Leicester, UK)
Declaration by registered environmental assessment practitioner		
Name	Christophe Charkos	
Qualification	Bachelor of Town Planning, UNSW	
Registration number	68392	
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		
Date	5 May 2026	

Glossary and Abbreviations

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Reg	<i>Biodiversity Conservation Regulation 2017</i>
BDAR	Biodiversity Development Assessment Report
CEEC	Critically Endangered Ecological Community
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
CTMP	Construction Traffic Environmental Plan
WSADCP	Western Sydney Aerotropolis Development Control Plan
DPHI	NSW Department of Planning, Housing and Infrastructure
ENT	Enterprise Zone
ENZ	Environment and Recreation Zone
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
LEP	Local Environmental Plan
MNES	Matters of National Environmental Significance
NRAR	Natural Resource Access Regulator
OEMP	Operational Environmental Management Plan
PBP	<i>Planning for Bushfire Protection 2019</i>

Reference	Description
PCT	Plant Community Type
POM	Plan of Management
Precinct Plan	Western Sydney Aerotropolis Precinct Plan
PSI	Preliminary Site Investigation
REF	Review of Environmental Factors
SAIL	Serious and Irreversible Impacts
SARs	Commonwealth Supplementary Assessment Requirements
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
Precincts SEPP	<i>State Environmental Planning Policy (Precincts – Western Parkland City) 2021</i>
SIA	Social Impact Assessment
Site	Lot A in DP406215
SSD	State Significant Development
SSDA	State Significant Development Application
TIA	Traffic Impact Assessment
VIS	Vegetation Integrity Score
WMP	Waste Management Plan
WSAP	Western Sydney Aerotropolis Plan
WSI	Western Sydney International (Nancy Bird Walton) Airport
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

Appendix List

Document Title	Consultant	Appendix
SEARs Compliance Table	Urbis	Appendix A
Statutory Compliance Table	Urbis	Appendix B
Precinct Plan Compliance Table	Urbis	Appendix C
Aerotropolis DCP Compliance Table	Urbis	Appendix D
Mitigation Measures	Urbis	Appendix E
Aboriginal Cultural Heritage Assessment Report	Artefact	Appendix F
Access Report	MGAC	Appendix G
Acid Sulfate Soil Desktop Study	EP Risk	Appendix H
Air Quality Impact Assessment	Northstar	Appendix I
Architectural Design Report	EMKC3	Appendix J
Architectural Plans	EMKC3	Appendix K
BCA Report	Jensen Hughes	Appendix L
Biodiversity Development Assessment Report	Land Eco Consulting	Appendix M
Bushfire Protection Assessment	Travers Bushfire and Ecology	Appendix N
Civil Design Drawings	Arcadis	Appendix O
Civil Infrastructure Report	Arcadis	Appendix P
Community and Stakeholder Engagement Report	Astrolabe Group	Appendix Q
Detailed Site Investigation	EP Risk	Appendix R
Ecologically Sustainable Design Report	Aspire Sustainability Consulting	Appendix S
Estimated Development Cost Report	Napier & Blakeley	Appendix T
Flood Impact and Risk Assessment	Worley Consulting	Appendix U
Geotechnical Investigation Report	Fortify Geotech	Appendix V
Groundwater Impact Assessment	EP Risk	Appendix W
Landscape and Visual Impact Assessment Report	Habit8	Appendix X
Landscape Design Report	Geoscapes	Appendix Y

Document Title	Consultant	Appendix
Noise and Vibration impact Assessment	Renzo Tonin	Appendix Z
Preliminary Risk Screening	SLR Consulting	Appendix AA
Salinity Management Plan	EP Risk	Appendix BB
Statement of Heritage Impact	Artefact	Appendix CC
Survey Plan	ENG Land Services	Appendix DD
Traffic Impact Assessment	Ason Group	Appendix EE
Vegetation Management Plan	Land Eco Consulting	Appendix FF
Wildlife Hazard Assessment and Wildlife Management Plan	Land Eco Consulting	Appendix GG
Connection to Country Report	Ngurra Advisory	Appendix HH
Waste Management Plan	Salt ³	Appendix II
Social Impact Assessment	HillPDA	Appendix JJ
Arboricultural Impact Assessment and Tree Protection Plan	Tree Survey Pty Ltd	Appendix KK
Airport Safeguarding Assessment	LR Airport consulting	Appendix LL
Net Zero Statement	Aspire Sustainability Consulting	Appendix MM
Operational Environmental Management Plan	INECO	Appendix NN
Draft Plan of subdivision	Ehsan Akar	Appendix OO
Section 4.39 Variation Request	Urbis	Appendix PP
Recognise Country Template	EMKC & Ngurra Advisory	Appendix QQ
Embodied Emissions Form	Aspire Sustainability Consulting	Appendix RR

Executive Summary

This Environmental Impact Statement (**EIS**) has been prepared on behalf of EMKC³ Pty Ltd (**the Applicant**) in support of a State Significant Development Application (**SSDA**) for a new industrial and warehousing development at 230 Martin Road, Badgerys Creek.

The site is located on Dharug Country and the project team acknowledges the Dharug people, their elders past and present and their deep and continuing connection to their land. In preparing this EIS the project team acknowledges the importance of a Country-centred approach to the design, guided by Aboriginal people.

The site is located on land within the Western Sydney Aerotropolis (**Aerotropolis**). The proposed development has an Estimated Development Cost (**EDC**) of \$108,866,194 (Excl. GST). The site is subject to the provisions under *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* (**Precincts SEPP/WPC SEPP**). The proposed buildings, car parking and site access as well as allowance for a corridor for the future park edge street (to be delivered by the relevant roads authority – Council) will be located entirely within the part of the site zoned Enterprise (**ENT**), with only minor landscaping (tree planting) proposed in land zoned Environment and Recreation (**ENZ**).

Warehouse and distribution centres and manufacturing (general industry) are permitted with consent within the ENT zone. section 4.13A of the Precincts SEPP is not relevant and accordingly, the proposal is classified as State Significant Development under *State Environmental Planning Policy (Planning Systems)* (**Planning Systems SEPP**) Schedule 1, Section 29 – Development in the Western Sydney Aerotropolis.

The intended outcomes of the project are to:

- Support the early activation of the Aerotropolis by delivering high quality warehousing and employment floorspace within the Badgerys Creek Precinct in a suitable location near the Western Sydney International Airport (**WSI**).
- Support the continued economic growth of the Western Parkland City through the delivery of new employment opportunities.
- Deliver new employment and warehouse floorspace in a location close to future transport routes that will support the efficient movement of freight.
- To support the vision for the Western Sydney Aerotropolis by promoting the principles of 'Connecting with Country' through a landscape-led approach through the retention of significant areas of ENZ land, stormwater management and landscaping.

Project Evolution

Various project alternatives were considered throughout the evolution of the design development process, which has evolved since inception, coordination with the internal consultant team, and externally through stakeholder engagement, e.g. GANSW SDRP and other key stakeholders.

Various alternative design options have been considered. These include expanding the built form to the east, increasing the proposed warehouses' height, and constructing a single consolidated warehouse on the site. These alternatives were deemed unsuitable as they would be inconsistent with the relevant development controls and prohibited within the ENZ which would require amendment Precincts SEPP and the Aerotropolis Precinct Plan (**Precinct Plan**). These options did not fully maximise the site's development potential within the ENT. The design team also considered alternative building orientations. However, this was not considered appropriate as it was not compatible with existing site levels (therefore resulting in inefficient civil engineering requirements) and would not provide a street presence for Lot 2 to Martin Road.

The proposed layout was ultimately identified as the most suitable option to achieve the project objectives for the following reasons:

- The project is consistent with the land use zoning for the site and will support the early activation of the Badgerys Creek Precinct by providing high quality employment floorspace within an area identified for Enterprise uses. The Metroll warehouse will supply essential building materials and will play a critical role in supporting the delivery of the Aerotropolis and housing within the Western Sydney Region. Such uses can reduce the cost of sourcing building materials given the reduction in distribution costs based on proximity to development locations.
- The proposal will fully optimise the development potential of areas of the site zoned ENT and protect land zoned ENZ and High Biodiversity Value areas (**HBV**). The proposed buildings, car parking, access and road corridor allowance for the future Park Edge Street will be located entirely within the ENT zone. No development is proposed on the rest of the site (zoned ENZ) except for minor tree planting. This approach will enable stormwater infrastructure on the site to be delivered in the future by Sydney Water (as envisaged by the Precincts SEPP and Precinct Plan) and enable the protection of high value biodiversity land along the Wianamatta Creek Corridor.
- The retention and protection of the ENZ will ultimately align with the broader work undertaken by DPHI in relation to establishing a place-based delivery strategy for the Wianamatta South Creek Precinct and Council in establishing road access to this area in the future through spatial allowance for the Precinct Plan road network to be delivered by others when required.
- The proposal will comply with the maximum building height for the site, which is well below OLS requirements.
- The proposed development can connect to primary freight routes via Martin Road (in the interim) and ultimately the future Eastern Ring Road, the upgraded Elizabeth Drive and the M12 Motorway.
- The proposed warehouses are consistent with the desired future character of the Badgerys Creek Precinct which will be defined by employment land uses. The speculative warehouse has been designed to support a diversity of industrial uses within the Precinct.
- The development can be achieved without having unacceptable environmental impacts.

The Proposal

A summary of the proposed development is provided in **Table 1** below.

Table 1 Summary of Proposed Development

Component	Details
Project Area	The site has a total area of 24.28 ha. Approximately 81,021 m ² will be affected by the project (excluding the potential park edge street which separates ENT land from ENZ).
Proposed Use	<u>Lot 1</u> Large format warehouse with ancillary office and manufacturing (including steel cutting) <u>Lot 2</u> Large format warehouse with ancillary office
Project Description	The project comprises: ▪ Bulk earthworks and site preparation works. ▪ Utility services and stormwater infrastructure (interim and ultimate scenarios) excluding the regional stormwater basin. ▪ Subdivision of the existing allotment into three (3) new allotments.

Component	Details
	- Construction and operational use of two warehouse and distribution centres with ancillary office and manufacturing (Warehouse 1 only). Approval is sought for the fit-out of Warehouse 1. - Landscaping - Site Access
Subdivision	- Proposed Lot 1: 4.19 ha - Proposed Lot 2: 9.1ha - Proposed Lot 3: 10.52 ha
Warehouse 1 (Lot 1)	- Gross Floor Area (GFA): - Warehouse and distribution centre – 16,465m² - Ancillary office – 600m² - Amenities block – 37m² Total – 17,102m² - Maximum Building Height = 12.95m 24 loading docks - Access: - Truck entry driveway in the northwest corner of the site - Combined car park entry / exit located to the south of the truck entry - Truck exit driveway located in southwest corner of Lot 1
Warehouse 2 (Lot 2)	- GFA: - Warehouse and distribution centre – 18,564m² - Ancillary office building 2A – 600m² - Ancillary office building 2B – 504m² Total – 19,668m² - Maximum Building Height = 12.65m 18 loading docks - Access: - Combined car park entry / exit driveway located opposite Office 2A - Truck entry / exit driveway located to the north of the car park entry / exit
Car Parking	<u>Lot 1</u> 86 spaces <u>Lot 2</u> 119 spaces
Landscaping	<u>Lot 1</u> 4,206m² <u>Lot 2</u> 3,412m²

Component	Details
Earthworks	Bulk cut and fill will be required to achieve flat pads for industrial development; access to the site from Martin Road; and flood immunity. The proposed surface grading will follow the existing site topography.
Infrastructure Upgrades	<u>Interim:</u> - The proposal includes provision for on-site stormwater detention that can appropriately service the site from a stormwater management perspective, until such a time as the regional stormwater basin is delivered by Sydney Water. - Noting the low traffic generation proposed, the proposal will have a negligible material impact to the performance of the external road network when compared to the existing site. Note: ongoing discussions with Council and investigations are currently being undertaken to determine whether the proposal will generate the requirement for pavement upgrades along a portion of Martin Road. - The proposal includes provision to upgrade the frontage of Martin Road to accommodate the future Collector Road in accordance with the Precinct Plan and Liverpool Aerotropolis 7.12 Contributions Plan (7.12 Plan) by means of a half-width upgrade for the length of the frontage only. - The proposal accommodates the possible future provision of a corridor for the future Park Edge Street – which is not a contributions road and will be delivered by the relevant roads authority (Council), subject to separate planning approval processes. Connections to the Park Edge Street will be provided by a future Riparian Street (contributions road) which is located in the property directly north providing a permeable and accessible solution to the future Park Edge Street. The subject proposal does not propose the dedication of land or carrying out of works for the future Park Edge Street. <u>Ultimate:</u> - The proposal will provide connection to the future regional stormwater basin once constructed by Sydney Water and the regional scheme is operational. - The proposal will utilise the future Collector Road and Eastern Ring Road for access to regional road network once delivered. - Ongoing discussions are required with Council (and adjacent landowners) to understand the full extent of upgrades required to Martin Road.
Employment opportunities	Construction: 60 FTE jobs Operational: 108 FTE jobs
Estimated Development Cost	\$108,866,194 (excluding GST) The Estimated Development Cost (EDC) has been calculated in accordance with DPHI's required form and is provided within the EDC Report located at Appendix T which also satisfies DPHI's requirements.
Staging/Phasing	The proposal will be constructed over a single construction phase. Note: staged construction certificates would be issued; however, the proposal does not constitute staged development pursuant to the Act.

Stakeholder Engagement and Community Consultation

Community and stakeholder engagement has been undertaken by Astrolabe Group (in relation to the community) and the project team (in relation to key stakeholders including Connecting with Country) during the preparation of the SSDA. This included direct engagement and consultation with:

- Adjoining landowners and occupants
- Government (State and Local), State Agencies and utility stakeholders
- Registered Aboriginal Parties (**RAPs**) and other First Nations representatives as part of the Aboriginal Cultural Heritage Assessment Report (**ACHAR**) reporting requirements and Connecting with Country process
- The outcomes of the community and stakeholder engagement have informed the final design of the proposed development and are discussed in detail in **Section 5** of this EIS.

Justification of the Project

This EIS assesses the development against the relevant planning instruments and policies and outlines the mitigation measures to ensure the project does not result in unreasonable or adverse environmental impacts. Additionally, the EIS and supporting documentations have addressed Secretary's Environmental Assessment Requirements (**SEARs**) issued for the project on 21 December 2023.

The key issues for all components of the project identified in the SEARs have been assessed in detail, with specialist reports underpinning the key findings and recommendations identified in the Assessment of Impacts in **Section 6**. It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated through planned management and mitigation measures.

The project is a positive development outcome for the site and surrounding area for these reasons:

- **The proposal is consistent with State and local strategic planning policies:**

The proposal is generally consistent with the relevant goals and strategies contained in:

- *Greater Sydney Region Plan: A Metropolis of Three Cities* (**Region Plan**)
- *The draft Sydney Plan* (**Draft Sydney Plan**)
- *Our Greater Sydney 2056: Western City District Plan* (**District Plan**)
- *Connected Liverpool 2040*
- *Better Placed guidelines*
- *Connecting with Country Framework* (GANSW, 2023)
- *Western Sydney Aerotropolis Plan* (**WSAP**)
- *Draft Statewide Industrial Lands Policy*
- *Wianamatta-South Creek – Cumulative Impacts on Flooding Policy 2026*
- *Technical Guidance for Achieving Wianamatta-South Creek Stormwater Management Targets*

- **The proposal satisfies the applicable local and state development controls:**

The proposal is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including

- State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (**Precincts SEPP**)
- 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 (Biodiversity and Conservation) 2021 (**BC SEPP**)
- State Environmental Planning Policy (Resilience and Hazards) 2021 (**R&H SEPP**)
- State Environmental Planning Policy (Industry and Employment) 2021 (**I&E SEPP**)
- State Environmental Planning Policy (Sustainable Buildings) 2022 (**SB SEPP**)
- Draft State Environmental Planning Policy (Climate Change and Natural Hazards) 2026 (**CC&NH SEPP**)
- *Western Sydney Aerotropolis Precinct Plan* (**Precinct Plan**)
- *Western Sydney Aerotropolis Development Control Plan 2022 (September 2024)* (**Aerotropolis DCP**)
- *Recognise Country Guidelines for Development in the Aerotropolis*
- *Aerotropolis Stormwater Scheme Plan*
- **The design responds appropriately to the opportunities and constraints presented by the site:**
 - The proposed development will be predominantly located in the land zoned ENT. Development in land zoned ENZ will be limited to tree planting and the future stormwater infrastructure basin being designed and delivered by Sydney Water. An integrated stormwater management approach is proposed in accordance with the principles set out in the Aerotropolis Precinct Plan, the Western Sydney Aerotropolis Development Control Plan (DCP) 2022 and the Technical Guidance for Achieving Wianamatta – South Creek Stormwater Management Targets.
 - The development avoids and protects areas of High Biodiversity Value located along the eastern boundary of the site (at its interface with Wianamatta (South) Creek).
 - The development has been designed to accommodate the potential for a future Park Edge Street (by virtue of making provision for a future a corridor which will be acquired, designed and delivered by the relevant roads authority in the future under separate planning and land acquisition processes), setbacks to a future Riparian Street and road corridor (shown on the draft Sydney Water scheme plans to be located within the lot to the north), provision for the future widening requirements of Martin Road to a collector road and regional stormwater infrastructure on the site as envisaged by the Precinct Plan. The delivery of the regional stormwater infrastructure will be undertaken by Sydney Water and the Park Edge Street (to be delivered by Council) will be delivered at a future point in time under separate planning processes. The remaining infrastructure will be delivered in the future by other agencies and funded by development contributions in accordance with Liverpool Council's 7.12 Plan.
 - The design of the proposed development has been informed by a Cultural Overlay Framework prepared by Ngurra Advisory and incorporates the principles of Connecting with Country in accordance with the Precinct Plan, DCP, Connecting with Country Framework, and Precincts SEPP.
 - The proposed development has been designed to comply with the relevant flood planning provisions and is supported by a Flood Impact Assessment. The proposal does not require any additional mitigation from a flood impact and risk management perspective (Worley Consulting, 2026).
 - Landscaped deep soil setbacks are provided along each boundary, including to the north which will adjoin a future Riparian Street (to be delivered by Council). The Riparian Street to be located on the adjacent lot to the north will ultimately provide visual connection to the Wianamatta South Creek corridor and a physical connection to a future Park Edge Street envisaged to run north-south along the eastern extent of ENT zoned land. The proposed setbacks (building and landscaping) and access to the site has been designed to allow for potential future widening of Martin Road which is a collector road to be funded by local contributions and delivered by

Council. Accordingly, the proposal has been designed to the Precinct Plan requirements and will deliver the upgrade for the frontage only to ensure appropriate access can be achieved.

- The environmental impacts of the proposed development can be appropriately mitigated as detailed within the EIS and in the Mitigation Measures outlined at **Appendix E**.

- **The proposal is highly suitable for the site:**

- Warehouse or distribution centres are permissible in the ENT zone and are consistent with the zone objectives which are to encourage employment and businesses, including logistics, support diverse employment uses compatible with future tech and work arrangements, promote resource efficiency, ensure a smooth transition from non-urban and conservation areas to employment uses, and provide necessary facilities and services for businesses and workers.
- Other than allowance for the future Sydney Water infrastructure (to be delivered by Sydney Water), the project avoids ENZ and HBV areas. Approximately 15.7ha of open space will be retained at the rear of the site which will ultimately be strategically planned under the place-based delivery strategy for the Wianamatta South Creek Precinct. This land will form a visual buffer from the east and ultimately form part of a wider regional open space network.
- The proposal is consistent with relevant State and local strategic and statutory policy and other plans, including the WSAP and Precinct Plan. The site is located within the Badgerys Creek Precinct, which is identified as a 'First Priority Area' in the Precinct Plan and includes objectives to encourage industries that leverage access to freight transport networks and WSI. The proposed development will be consistent with the desired future character of the surrounding area.
- The site is well located close to existing and future road infrastructure including the soon to be upgraded Elizabeth Drive, M12 Motorway and the future Eastern Ring Road. These roads will be primary regional routes serving the Aerotropolis. As noted above proximity to these transport routes will be critical to the logistics supply chain and a pre-requisite for many industrial tenants including Metroll.
- The height, scale and massing of the proposal is appropriate for the site and complies with the relevant planning controls and airport safeguarding requirements.

- **The proposal is in the public interest:**

- The proposal will create 60 full time employment (FTE) construction jobs and 108 (FTE) operational jobs.
- The proposed development will support the early activation of the Badgerys Creek Precinct and the growth of the Western Sydney Aerotropolis more widely.
- The Metroll warehouse will supply and distribute materials to support construction work in the Aerotropolis and planned housing growth across Western Sydney.
- The proposed development will fully optimise the development potential of the site in accordance with the Western Sydney Aerotropolis Plan and protects areas zoned ENZ and HBV.
- The project does not preclude the delivery of the Aerotropolis road network including future access to the Wianamatta South Creek corridor. The road network including the Riparian Street to the north will provide ecological corridors and facilitate visual and active transport connection to the Wianamatta South Creek corridor.
- The proposed development will provide high quality and functional warehouse or distribution centre facilities, addressing the growing need for contemporary logistics floorspace within Western Sydney and supporting the role of Western Sydney International Airport and evolving societal trends.
- The issues identified during the stakeholder engagement have been addressed by the design of the proposed development as well as the assessment of impacts.

1 Introduction

This Environmental Impact Statement (**EIS**) has been prepared by Urbis Ltd (**Urbis**) on behalf of EMKC³ Pty Ltd (**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 a new industrial and warehousing development at 230 Martin Road Badgerys Creek (**the site**).

The site is located on Dharug Country and the project team acknowledges the Dharug people, and pays respect to their elders past and present, and acknowledges their deep and continuing connection to their land. In preparing this EIS the project team acknowledges the importance of a Country-centred approach to the design, guided by Aboriginal people.

1.1 Applicant Details

The applicant details for the proposed development are listed in the following table.

Table 2 Applicant Details

Applicant	EMKC ³ Pty Ltd
Postal Address	Level 11, 37 York Street, Sydney, NSW, 2000
Nominated Contact	Pawan Lala

1.2 Project Team

The EIS should be read in conjunction with the following plans and technical consultant / specialist reports:

Table 3 Supporting Documentation

Document Title	Consultant	Appendix
SEARs Compliance Table	Urbis	Appendix A
Statutory Compliance Table	Urbis	Appendix B
Precinct Plan Compliance Table	Urbis	Appendix C
Aerotropolis DCP Compliance Table	Urbis	Appendix D
Mitigation Measures	Urbis	Appendix E
Aboriginal Cultural Heritage Assessment Report	Artefact	Appendix F
Access Report	MGAC	Appendix G
Acid Sulfate Soil Desktop Study	EP Risk	Appendix H
Air Quality Impact Assessment	Northstar	Appendix I
Architectural Design Report	EMKC3	Appendix J
Architectural Plans	EMKC3	Appendix K
BCA Report	Jensen Hughes	Appendix L

Document Title	Consultant	Appendix
Biodiversity Development Assessment Report	Land Eco Consulting	Appendix M
Bushfire Protection Assessment	Travers Bushfire and Ecology	Appendix N
Civil Design Drawings	Arcadis	Appendix O
Civil Infrastructure Report	Arcadis	Appendix P
Community and Stakeholder Engagement Report	Astrolabe Group	Appendix Q
Detailed Site Investigation	EP Risk	Appendix R
Ecologically Sustainable Design Report	Aspire Sustainability Consulting	Appendix S
Estimated Development Cost Report	Napier & Blakeley	Appendix T
Flood Impact and Risk Assessment	Worley Consulting	Appendix U
Geotechnical Investigation Report	Fortify Geotech	Appendix V
Groundwater Impact Assessment	EP Risk	Appendix W
Landscape and Visual Impact Assessment Report	Habit8	Appendix X
Landscape Design Report	Geoscapes	Appendix Y
Noise and Vibration impact Assessment	Renzo Tonin	Appendix Z
Preliminary Risk Screening	SLR Consulting	Appendix AA
Salinity Management Plan	EP Risk	Appendix BB
Statement of Heritage Impact	Artefact	Appendix CC
Survey Plan	ENG Land Services	Appendix DD
Traffic Impact Assessment	Ason Group	Appendix EE
Vegetation Management Plan	Land Eco Consulting	Appendix FF
Wildlife Hazard Assessment and Wildlife Management Plan	Land Eco Consulting	Appendix GG
Connection to Country Report	Ngurra Advisory	Appendix HH
Waste Management Plan	Salt ³	Appendix II
Social Impact Assessment	HillPDA	Appendix JJ
Arboricultural Impact Assessment and Tree Protection Plan	Tree Survey Pty Ltd	Appendix KK

Document Title	Consultant	Appendix
Airport Safeguarding Assessment	LR Airport consulting	Appendix LL
Net Zero Statement	Aspire Sustainability Consulting	Appendix MM
Operational Environmental Management Plan	INECO	Appendix NN
Draft Plan of subdivision	Ehsan Akar	Appendix OO
Section 4.39 Variation Request	Urbis	Appendix PP
Recognise Country Template	EMKC & Ngurra Advisory	Appendix QQ
Embodied Emissions Form	Aspire Sustainability Consulting	Appendix RR

1.3 Project Description

The SSDA seeks consent for:

- Site clearance works, including the removal of existing structures
- Bulk earthworks and the installation and augmentation of utilities infrastructure and other services
- Construction and operational use of two warehouse or distribution centres containing ancillary manufacturing use in the proposed Lot 1 building with associated parking, landscaping across the site and access
- Other ancillary works including stormwater infrastructure (excluding works to be delivered by public authorities e.g., Park Edge Street and the Regional Stormwater Infrastructure basin) and delivery of the frontage upgrade of along Martin Road to facilitate access to the site.

The key objectives for the proposed development and the way in which these have been achieved are summarised in **Table 4**.

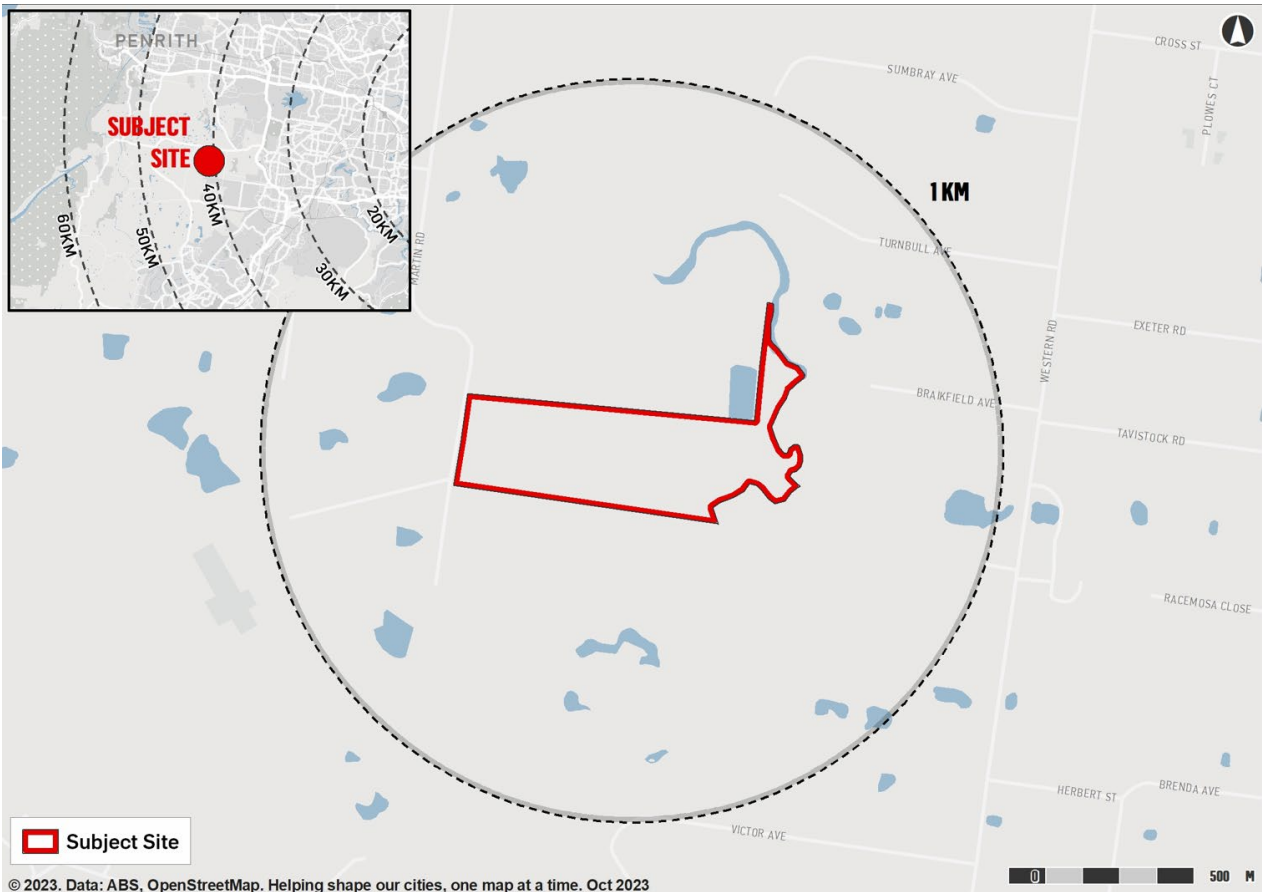
Table 4 Project Objectives

Objective	Proposed Development
To support the early activation of the Western Sydney Aerotropolis by delivering high quality warehousing and employment floorspace within the Badgerys Creek Precinct in a suitable location adjacent to Western Sydney International Airport (WSI)	The proposed development will comprise the construction of two (2) contemporary warehouse or distribution centres with ancillary office floorspace. Warehouse 1 will also have an ancillary manufacturing component and will be occupied by Metroll – a manufacturer and supplier of steel building products. The proposal will be one of the first projects to be constructed and delivered in the Badgerys Creek Precinct, which is identified as a ‘First Priority Area’ in the Western Sydney Aerotropolis Precinct Plan (Precinct Plan). The site is approximately 2km east of WSI and is very well located close to the primary freight network serving the Aerotropolis including the future Eastern Ring Road, Elizabeth Drive, and M12 Motorway,

Objective	Proposed Development
To support the continued economic growth of the Western Parkland City through the delivery of new employment opportunities	The proposed development will deliver 60 construction jobs and 108 full time employment operational jobs.
To deliver new employment and warehouse floorspace in a location close to future transport routes that will support the efficient movement of freight.	The site is well located close to the Elizabeth Drive, the future Eastern Ring Road and the new M12 Motorway. Future tenants will therefore benefit from excellent access to the regional freight network providing enhanced connectivity to the site and wider Sydney Metropolitan Region. Access to the site will be provided from Martin Road. The front setback along Martin Road has been designed to accommodate future widening of Martin Road (if required) noting its envisaged function as a Collector Road under the Contributions Plan and Precinct Plan. The proposed design complies with the relevant setback requirements and design criteria for development adjoining Collector Roads.
To support the vision for the Western Sydney Aerotropolis by promoting the principles of 'Connecting with Country' and through an integrated approach to stormwater management and landscaping	The proposed development has been informed by a 'Cultural Overlay Framework' prepared by Ngurra Advisory (Appendix HH). The landscape design has been inspired by the principles of 'Connecting with Country' and responds to the different ecological characteristics of the site which includes the retention and protection of 15.7ha of Environment and Recreation Zone (ENZ) and High Biodiversity Value (HBV) areas on the site which will ultimately form part of the Wianamatta South Creek Delivery Strategy being prepared by DPHI. The project supports and does not preclude the delivery of visual and physical connections to Wianamatta South Creek in accordance with the Precinct Plan. This includes the future delivery of the precinct road network which will be funded in part by State and local development contributions. An integrated approach to stormwater management and landscaping is proposed. All stormwater runoff collected from the proposed development will be directed to an on-site detention (OSD) tank located underneath a proposed hardstand area and adjoining on-site stormwater detention basin to the east of Warehouse 1 serving as the site's interim stormwater basin until such a time as the regional infrastructure network is delivered which is located within the ENZ zone of the subject site. Discharge from the OSD tank will subsequently be directed to a bioretention basin that will outlet to the existing farm dam located in the eastern part of the site.

A map of the site in its regional setting is provided as **Map 1**.

Map 1 Regional Context



Source: Urbis

1.4 Project Background

1.4.1 Planning History

The site has a history of agricultural uses and contains existing structures and outbuildings on the site. The site has been the subject of a proposed SSDA for an asphalt plant as detailed in the planning history in **Table 5**.

Table 5 Site Planning History

Previous Application Reference no.	Description/Key Issues	Outcome
SSD-10866203	A Request for Secretary's Environmental Assessment Requirements (SEARs) was lodged in 2020 in relation to the proposed construction and operation of an asphalt plant, reconomy facility and bitumen products plant (known as Western Sydney Sustainable Road Resource Centre) on the site.	Withdrawn
VPA-51	An application for a Voluntary Planning Agreement (VPA) was registered in November 2022. The proposed VPA relates to "SSD-10866203 - Construction and operation of an Asphalt plant, Reconomy facility and Bituman products manufacturing plant".	Withdrawn – Associated with SSD-10866203

1.4.2 Key Strategies

The following key strategies have been adopted to avoid, minimise or offset the impacts of the project:

- The project design and landscape strategy has been informed by a Cultural Overlay Framework prepared by Ngurra Advisory (**Appendix HH**) with a particular focus on landscape architecture; wayfinding; and public art installations. The Connecting with Country approach is outlined in Section 1.4.3.
- The EIS and accompanying documentation demonstrate how the proposed development incorporates the principles of 'Connecting with Country' in accordance with the Precinct Plan; Western Sydney Aerotropolis Development Control Plan (WSADCP) 2022; the Connecting with Country Framework (CWC Framework); Recognise Country Guidelines for Development in the Aerotropolis (as reference under the Precincts SEPP); and, the Precincts SEPP.
- The proposed warehouse development will be confined to the Enterprise (ENT) zoned land which also includes area set aside for a future Park Edge Street. The majority of the ENT land will be protected and rehabilitated through scattered tree planting and revegetation strategies however land adjacent to the ENT zone will be utilised for a stormwater detention basin as part of Sydney Water's regional stormwater network as outlined below.
- The development avoids and protects all areas of HBV along the eastern boundary of the site (at its interface with South Creek).
- The development is generally outside the 1:100 Average Recurrence Interval (ARI). Where encroachments into the flood fringe areas are unavoidable, the design has been informed by the recommendations of a detailed flood risk assessment report (refer to **Appendix U**) which considers flood behaviours in the post-development scenarios for the site.
- The project team has engaged with Sydney Water in relation to the area of the site identified for regional stormwater infrastructure and to identify design requirements (interim and final) for this asset. These discussions are ongoing and the design has considered the recently published draft *Stormwater Scheme Infrastructure Design Guideline: Western Sydney*.

- A systems-based approach is proposed to stormwater management in accordance with the principles set out in the Precinct Plan, WSADCP 2022 and the *Technical Guidance for Achieving Wianamatta – South Creek Stormwater Management Targets*. The project can meet the specific requirements of the Mean Annual Runoff Volume (MARV) Stormwater Flow Targets for both the interim and final stormwater design.
- The Civil Infrastructure Report (**Appendix P**) describes the consultation undertaken with Sydney Water and Liverpool City Council and the interim and ultimate measures proposed to ensure that appropriate stormwater management can be achieved as part of the local and regional infrastructure upgrades envisaged for the Precinct. A feasibility study has previously been submitted to Sydney Water to ensure any key matters have been addressed in the stormwater design.
- The development maximises the pervious areas of the site through the retention of a significant portion of ENZ zoned land and provides tree canopy cover to achieve the objectives of the Precinct Plan and the WSADCP 2022 whilst balancing competing constraints related to airport safeguarding and bushfire.
- The proposed development incorporates the principles of ecologically sustainable development (ESD) through integration of PV panels across the rooftop areas, enhanced landscape planting where possible, careful selection of building materials and colours that respond well to the climate and all other initiatives listed under the ESD Report will be considered during the detailed design phase of the project.

1.4.3 Connection with Country

Connection with Country forms an integral part of the proposed development from a landscaping perspective and will continue to guide the detailed design. Darug Elders, Knowledge Holders and community members have shared significant knowledge that has informed the design of the proposal.

Design priorities have been identified based around the following 'key themes' and 'key sub-themes':

- Cumberland Plain
- Freshwater
- Artefacts
- Native Plants
- Artwork
- Language
- Bringelly Shale

Additionally, the retention of the ENZ zoned land will contribute to the site's ecological value and reflect the principles of 'Care for Country' as set out in the 'Recognise Country Guidelines'.

Cumberland Plain

Country Theme

Darug land is open plain Country with lush undulating hills and subtle ridges and valleys, which create a complex system of ephemeral water. There is a variety of wildlife within Darug land.

Design Response

Acknowledging the significance of the Darug people and the importance the Cumberland Plain environment held for their culture and identify forms will be acknowledged within the proposed development. This will be achieved through the innovative use of colours and textures throughout the

interior of the buildings; art installations; the landscape design; and the use of interpretive fencing panels as illustrated in the figure below.

Figure 1 Precedent images for incorporating connecting with country principles



Source: Ngurra

Freshwater

Country Theme

Freshwater waterways provided fresh drinking water and important food sources for Darug people as well as habitat for native fauna. Waterways have strong and continuous characteristics interconnected as Country.

Design Response

The significance of freshwater will be recognised through symbology within the development and the Applicant's commitment to sharing the stories of the Darug people.

Artefacts

Design Response

The display of Aboriginal artefacts (using QR codes within the interior of the buildings) will be considered as part of the detailed design of the development. This will enhance storytelling of the Darug people's history and enable staff and visitors to connect with and learn from Darug Elders about cultural history and knowledge.

Native Plants

Design Response

The inclusion of local plant species that have cultural, practical and medicinal functions is an integral feature of the landscape design. As illustrated in the figure below, a range of native plants are proposed across the site, which will acknowledge the significance of the Darug people and the importance these plants held for their culture. The landscape design of the site includes herbalist gardens located around the outdoor amenity spaces, which will provide foraging and bush tucker opportunities and serve as an important haven for native wildlife. EMKC will commit to source native plant species from a First Nations landscaping business if available.

Figure 2 Native plant species



Source: Ngurra

Artwork

Design Response

The use of Aboriginal artwork within the proposed development will act as a visual way to convey the knowledge of the land, events and beliefs of the Darug people. Potential uses of artwork that may be incorporated into the proposed development include interior and exterior art; landscape art; lighting; furniture; floor art; glazing; sculptures and wayfinding art.

The Cumberland Plain and Wianamatta–South Creek are important resources to the Darug people as they hold their culture and identity. Interpretations of the Cumberland Plain and Wianamatta–South Creek will be displayed throughout the site, with a Darug artist commissioned to undertake this work.

Language

Design Response

The use of Aboriginal language throughout the proposed development will create an opportunity to interact with staff and visitors and serve to commemorate and celebrate the Darug culture. Methods for incorporating knowledge and language of the Darug people within the proposed development will be investigated and may include landscape design, interpretive signage, artwork and the naming of buildings and rooms, and other placemaking initiatives within the site.

Welcome to country will be etched into the concrete on entry to the site. This will be designed in partnership between the Darug community following the formation of the Applicant's First Nations Advisory Group.

Bringelly Shale

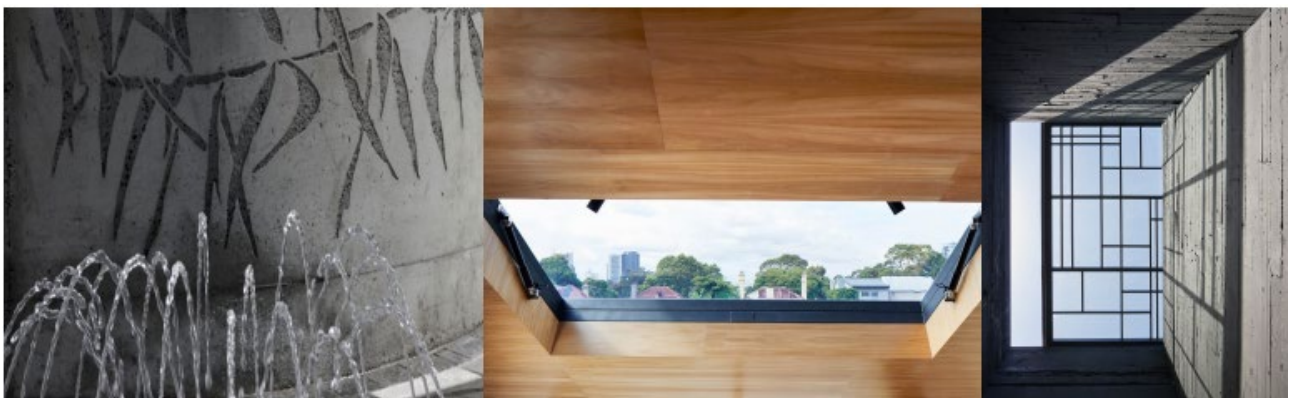
Design Response

The landscape and amenity areas will feature sandstone rocks, which will create unique seating blocks nestled amongst the native planting. The sandstone rocks will provide a link to the Bringelly Shale, which is prominently found in western Sydney including near Bringelly.

As illustrated in the figure below, other opportunities for incorporating Connecting with Country principles will also be investigated and may include:

- Etching in concrete walls (welcome to country and artworks)
- Placement of skylights that open spaces and allow people inside a building to feel connected to the sky
- Language embedded within walls and stairs

Figure 3 Other opportunities for incorporating Connecting with Country principles



Source: Ngurra (2024)

Community based initiatives

The Darug Elders, Knowledge Holders and Community members have expressed a desire for the proposed development to create employment opportunities for local mob. The Applicant will consider the development of an Aboriginal and Torres Strait Islander Employment Strategy. The Strategy could focus on attracting and recruiting Aboriginal and Torres Strait Islander employees; and creating a respectful and culturally safe workplace for Aboriginal and Torres Strait Island people.

Additionally, the Applicant is committed to the economic participation of First Nations businesses throughout the construction and operation of the proposed development and will consider preparing an Aboriginal Participation Strategy.

A First Nations Advisory Group will also be established to implement the Connecting with Country Cultural Overlay Framework. This group will become a key advisory point for the Applicant in relation to all matters of cultural significance and will ensure that decisions are made in partnership with the community. Potential members of the Working Group may include Darug Elders and Knowledge Holders; Darug Community Members; members of the Applicant's management team; and representatives from local Aboriginal organisations.

1.5 Related Development

The site is used for agricultural purposes and as such there is no related development associated with this proposal. Additional approvals that would be subject to future separate applications and assessment include:

- S73 Compliance Certificate for water connectivity – *Sydney Water Act 1994*
- S138 Roads Act Approval for new crossovers – *Roads Act 1993*
- Chapters 5A and 6 of the National Electricity Rules (NER) for new electricity connections and any contestable services under the *Electricity Supply Act 1995* (to be confirmed prior to the issue of a relevant Construction Certificate)

1.6 Restrictions and covenants

There are no known easements or covenants affecting the site.

2 Strategic Context

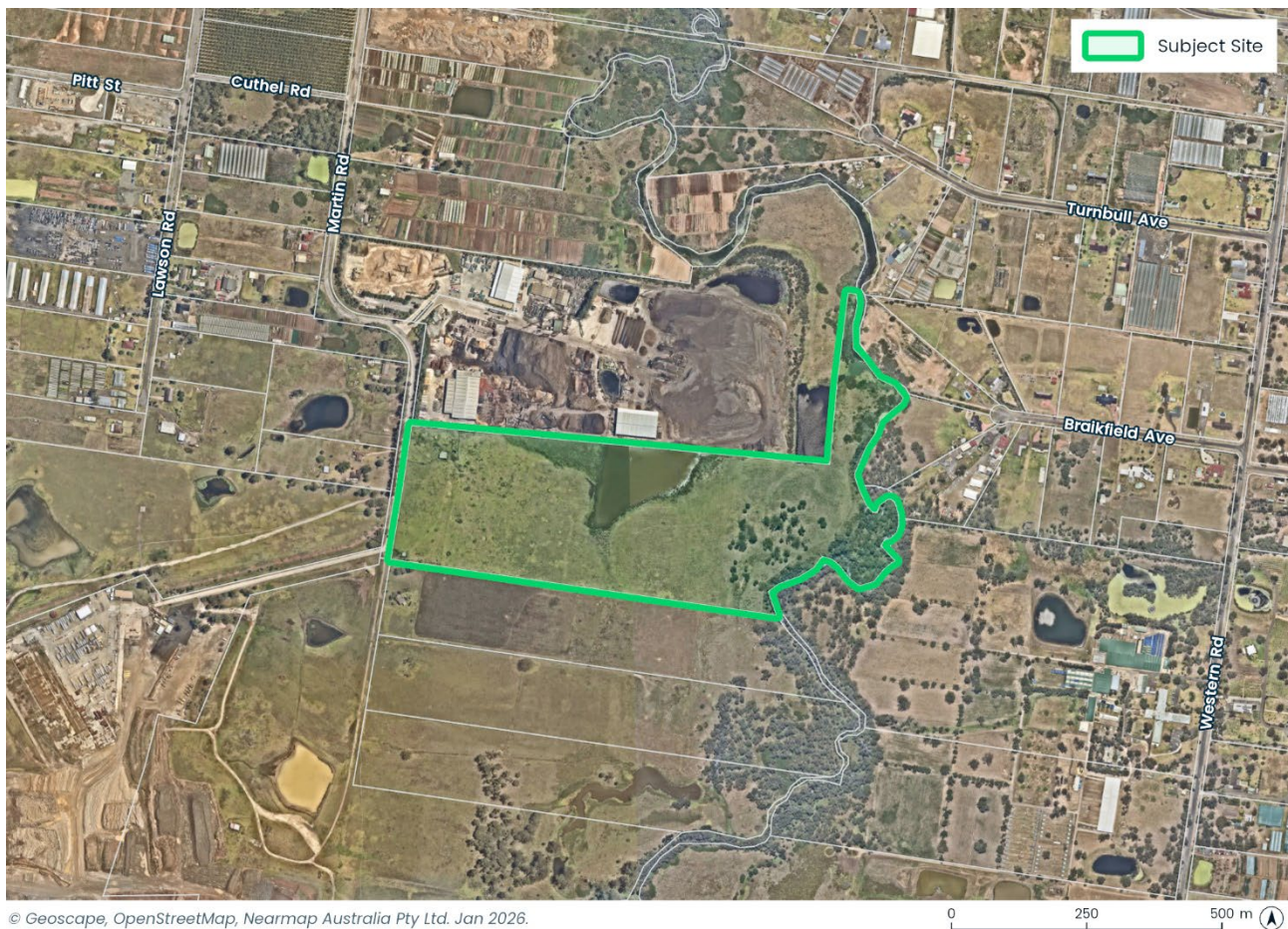
This section of the EIS describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project, each of which are addressed in further detail in **Section 7** of this EIS.

2.1 Key Features of Site and Surrounds

The site is located at 230 Martin Road, Badgerys Creek within the Liverpool Local Government Area (**LGA**).

The location of the site is illustrated in **Map 2**. Photographs of the current site conditions are provided in **Figure 4** overleaf.

Map 2 Local Context



Source: Urbis (2026)

Figure 4 Site Photographs



Picture 1 View of site from Martin Road (NW corner)
Source: Google Streetview, 2023



Picture 2 Existing structure located on the site
Source: Google Streetview, 2023



Picture 3 View of site from Martin Road
Source: Google Streetview, 2023



Picture 4 View of site from Martin Road (SW corner)
Source: Google Streetview, 2023



Picture 5 ANL Landscapes Stockpile to the north of the site viewed from Martin Road
Source: Urbis



Picture 6 ANL Landscapes - stockpile adjacent to the site's northern boundary.
Source: Urbis

The key features of the site which have the potential to impact or be impacted by the proposed development are summarised in **Table 6**.

Table 6 Key Features of Site and Locality

Descriptor	Site Details
Legal Description	Lot A in Deposited Plan 406215
Site Area and Configuration	The site has an area of approximately 24.28ha. It is irregular in shape. The eastern boundary corresponds with the alignment of South Creek.
Land Ownership	The site is currently in private ownership.
Topography	The site experiences a general slope from the southwest corner on Martin Road through to the northeast. The topography has been critical in relation to facilitating a flat building pad for the proposed development to be designed upon factoring in future crossovers from Martin Road, future operational requirements (r.e. internal warehousing and externally for circulation and movement).
Existing Attributes	Agricultural land with an existing farm dam and associated structures. The Wianamatta South Creek vegetated riparian corridor runs along the eastern boundary. In accordance with the Government's Hydroline Spatial mapping, it indicates the presence of a first order hydroline located on the adjacent site to the north before crossing into the subject site near the existing farm dam. The location of this hydroline has been confirmed within Sydney Water's finalised regional stormwater scheme and is planned to be utilised for a naturalised trunk drainage channel serving a regional stormwater basin as it serves a catchment greater than 15ha.
Local Context	The land immediately adjoining the site forms part of the Western Sydney Aerotropolis and is expected to undergo significant transformation. The surrounding locality is described below: ▪ North: The adjacent site is operated by Australian Native Landscapes (ANL), a landscaping, agricultural and gardening supplier. It includes several 'warehouse' buildings. Aerial imagery and Photos 5 and 6 shows large stockpiles on the site which adjoin the northern boundary. Further north, the area is characterised by agricultural landholdings and some dwellings. As noted above this site contains a mapped first order hydroline which will eventually form part of Sydney Water's regional stormwater network and riparian street. ▪ East: The Wianamatta (South) Creek waterway runs north to south along the site's eastern boundary and is Crown Land. An agricultural research station and cemetery is located beyond on its eastern bank. ▪ South: The adjacent land currently comprises agricultural farm holdings, with South Creek beyond. The adjacent property to the south (235 Martin Road) is owned by Boral who were seeking to undertake a concrete batching facility across the land however have not progressed an application. The site at 225-245 Martin Road was recently purchased by Goodman from CSR. This site is subject to two (2) SSDs (SSD-97711727 and SSD-97688711). Land to the south of Goodman is owned by Inghams Property Group. A Master Plan for the Inghams land located at 475 Badgerys Creek Road was adopted in July 2025. ▪ West: A large brick manufacturing facility previously operated by CSR (comprising several structures and existing dams) is located to the

Descriptor	Site Details
	southwest of the site on the opposite side of Martin Road. SSD-97711727 and SSD-97688711 is currently proposed across this site.
Regional Context	The site is located within the Western Sydney Aerotropolis and to the east of the new WSI. Approximately 11,000 ha of land was rezoned for employment uses in 2020 under the Precincts SEPP to support WSI which is expected to be complete and operational by late 2026. Bradfield City Centre' is being developed to the southwest of the site in the adjoining 'Aerotropolis Core Precinct'. The Precinct Plan identifies several other smaller Neighbourhood Centres nearby the site, including centres to the north (around Pitt Street), west and south.
Infrastructure Existing and Future	The site is located a short distance south of Elizabeth Drive (which is approved to be upgraded and provides direct access to the A9 to the west and M7 to the east) and southwest of the recently completed M12 Motorway. As part of the approved upgrade works, an additional two traffic lanes will be provided along Elizabeth Drive. The intersection between Elizabeth Drive and Martin Road was recently upgraded to an interim signalised intersection by CSR. In advance its upgrade to the Eastern Ring Road (ERR), widening and land reconfiguration is also proposed along Martin Road to accommodate the Elizabeth Drive upgrade works and to tie in with the future ERR. However, it is understood that current funding for the Elizabeth Drive upgrade does not include the Martin Road intersection. The WSAP and Precinct Plan envisage that the ERR will be constructed to the west of the site and provide connections to Martin Road. The ERR will be a 60m wide regional road and will provide for rapid bus and active transport. The ERR is anticipated to be a primary freight and public transport route within the Aerotropolis connecting the Northern Road to the south with Elizabeth Drive. The recently released Aerotropolis Sector Plan developed by Infrastructure NSW identifies the ERR as a 2040 Priority. The Precinct Plan provides a fine grain indicative local road network much of which has not yet been established. The road network follows the alignment of existing roads where possible and will ultimately provide visual, ecological, active and vehicular transport connections across the precinct. The local road network in the Badgerys Creek Precinct will be partly funded by infrastructure contributions under the Liverpool 7.12 Plan. This includes the adjacent Riparian Street to the north and Martin Road (a future collector road). It is noted that the future Park Edge Street shown in the Precinct Plan is not proposed to be funded by the 7.12 plan. The Precincts SEPP and the Precinct Plan provide locations for future stormwater infrastructure to be delivered by Sydney Water as part of its regional stormwater network. The site does not include works within the area of the ENZ zone reserved for acquisition for the future regional basin; however, includes provision for interim stormwater solutions that can accommodate the future regional solution once acquired, constructed and delivered by Sydney Water.
Site Access	Access to the site is currently provided from Martin Road which runs from south to north connecting to Elizabeth Drive. This section of Martin Road will ultimately forms part of the collector road network that will enable connection to the broader regional road network.

Descriptor	Site Details
Easements and Covenants	There are no known easements or covenants affecting the site.
Land Acquisition	The central part of the site (within the ENZ zone) is identified as 'Stormwater infrastructure' on the Precincts SEPP Land Reservation Acquisition Map. This area will ultimately be acquired and developed as by Sydney Water part of its regional stormwater network which will be funded by a new Stormwater DSP. It is noted that the ultimate area to be acquired by Sydney Water may vary from the area identified within SEPP. This will ultimately depend on the final design and location of the regional stormwater infrastructure. Further, whilst not formally reserved for acquisition, local road corridors pertaining to the potential future Park Edge Street have been considered for the purposes of a corridor and will be subject to acquisition and delivery by the relevant roads authority (Council). Martin Road is a contributions road and the proposal has been designed to consider any future widening to Martin Road, and includes provision to upgrade the frontage of the site consistent with the requirements of the future collector road.
Services	The following services are currently available to the site: ▪ Potable Water: A 100m Sydney Water main located in Martin Road. ▪ Electrical: there is an overhead pole with existing LV network located on Martin Road. ▪ Telecommunications: existing telecommunication infrastructure in Martin Road. ▪ Jemena: A secondary high-pressure gas main along Martin Road.
Acid Sulfate Soils	The site is not mapped as containing the potential for Acid Sulfate Soils.
Contamination	A detailed site investigation has been undertaken in support of this application. Findings from investigations from the former SSD-10866203 were duly considered as part of the preliminary investigations. Please refer to section 6.2 of this report and Appendix R .
Flooding	The eastern portion of the site (ENZ zone) is identified as flood prone land. The proposed development is therefore required to comply with the relevant flood planning provisions and supported by a Flood Impact Assessment (including associated flood modelling). Please refer to section 6.1.7 of this report and Appendix U .
Bushfire Prone Land	The site contains 'Vegetation Category 1'; 'Vegetation Category 3' and 'Vegetation Buffer' land. The Vegetation Category 1 land is limited to a small area around the site's eastern boundary (at its interface with South Creek). The majority of the land is 'Vegetation Category 3'.
Flora and Fauna	The site contains an HBV Area (existing native vegetation). The area of existing native vegetation is limited to around the eastern boundary of the site (at its interface with South Creek). The Growth Centres Biodiversity Certification Order identifies the site as 'certified' and 'non-certified' biodiversity. The extent of the site that comprises Biodiversity Certified land is shown in the enclosed Biodiversity Report. Most of

Descriptor	Site Details
	the ENT zoned land is bio-certified. A BDAR has been prepared for those areas of the site not subject to this certification.
Aboriginal Cultural Heritage	The eastern part of the site is identified as 'Aboriginal cultural sensitivity – high' and 'Aboriginal cultural sensitivity – moderate' in the Aerotropolis Precinct Plan. These areas of Aboriginal cultural sensitivity are limited to the part of the site closest to South Creek.
Historic (European) Heritage	The Aerotropolis Precinct Plan identifies a local Heritage item on the site however it is noted that this item is not listed in Schedule 11 of the Precincts SEPP. A Heritage Impact Assessment has been prepared to investigate the heritage significance of the site and the heritage item. Please refer to section 6.1.16 of this report and Appendix CC .
Obstacle Limitation Surface	The site is affected by Obstacle Limitation Surface (OLS) for WSI. The Precincts SEPP identifies an Inner Horizontal Surface RL of 125.5m AHD for the site. Given the site's RL of 46.2m this means that the height of the OLS relative to ground level would be approximately 79.3m above existing ground.
Noise Exposure	The Precincts SEPP Noise Exposure Map identifies an Australian Noise Exposure Concept (ANEC) contour of 20 – 25 for the site. Any development will need to consider relevant controls related to aircraft noise.
Wildlife Buffer Zone	The site is located within the 3km (and 13km) Wildlife Buffer Zone as defined in the Precincts SEPP which requires consideration of whether the development and landscaping may attract wildlife that may present a risk to the operation of WSI. In addition to the Precincts SEPP requirements, the Aerotropolis DCP includes prescriptive controls to ensure wildlife attraction is limited and managed by developments. The proposal has considered this in the overall design and responds accordingly in the compliance tables supporting the application.
Lighting Buffer Area	Within 6km lighting buffer area under the Precincts SEPP which requires consideration of the potential risk of certain development in relation to lighting and reflectivity.

2.2 Cumulative Impacts with Future Projects

The site is located within the Western Sydney Aerotropolis. Land identified within the Aerotropolis (including the Badgerys Creek Precinct) was rezoned in 2020 for employment land uses and expected to undergo significant transformation in accordance with the objectives and vision of the WSAP and Precinct Plan.

Approved and likely future developments of relevance in respect of cumulative impacts are summarised in the following table.

Table 7 Approved and Likely Future Developments

Address	Reference	Development	Status
1990 Elizabeth Drive, Badgerys Creek	SSD-53643233	The establishment of a concept masterplan to support development for the purpose of tourist and visitor accommodation and commercial premises	SEARs issued 23/02/2023

Address	Reference	Development	Status
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 Under Appeal
WSI Airport	NA	The Environmental Impact Statement and the Airport Plan for the WSI were finalised in 2016. Construction is currently ongoing, with the airport anticipated to open in 2026.	Master Plan approved. Construction completed and operations of first runway to commence in 2026.
475 Badgerys Creek Road, Bradfield	WSA_MP01	Ingham Property Group are preparing a masterplan for this 182-hectare site. A master plan request was lodged in March 2022, which included an indicative structure plan for the site. The indicative structure plan shows that the site will predominately comprise 'enterprise and light industry' uses. 'Business and enterprise' and a 'local/neighbourhood centre' are also envisaged.	Approved
215 Badgerys Creek Road	WSA_MP02	The Western Parkland City Authority have prepared a masterplan for Bradfield City Centre	Approved September 2024
1675 The Northern Road	WSA_MP03	Greendale? Development Company are preparing a masterplan for this site for industrial and agribusiness purposes	On exhibition
Elizabeth Drive Upgrades	NA	A Review of Environmental Factors (REF) was published in September 2023. The proposed upgrades to Elizabeth Drive will address growth and additional traffic associated with the new airport and provide direct access to employment lands within the aerotropolis. 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.	Stage 1 West funding approved Stage 1 East under investigation
M12 Motorway	SSI-9364	A new dual-carriageway motorway to connect the M7 Motorway with the WSI 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. Now operational

Address	Reference	Development	Status
Sydney Metro – WSI	SSI 10051	A new metro line to service WSI Airport, the Western Sydney Aerotropolis and interchanging with the T1 Western Line at St Marys. Six new stations will be constructed at St Marys, Orchard Hills, Luddenham, Bradfield, and with the airport site (the airport terminal and airport business park).	Approved 23 July 2021. Under construction
First Building, Bradfield City Centre	SSD-25452459	Construction and operation of an advanced manufacturing, research, development and training facility	Approved 09 September 2022 and construction completed
Barings Luddenham	SSD-48438209	Construction and operation of a warehouse and distribution centre	Approved 15 April 2025
Building 2 Advanced Manufacturing Research Facility	SSD-58591961	Construction and operation of an advanced manufacturing research facility within the Bradfield City Centre with associated car parking and landscaping	Approved 07 April 2025
Bradfield City Centre Central Park	SSD-65490715	Construction of the Bradfield City Centre Central Park including associated structures and landscaping works	Approved 06 March 2025
Boral's Badgerys Creek Industrial Area	SSD-60644466	Concept and Stage 1 application for Boral's Badgerys Creek Industrial Area comprised of: Stage 1 – concrete batching plant and research & development lab Stage 2 – resource management facility	Preparation of EIS
Badgerys Creek Industry 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
1669-1723 Elizabeth Drive	SSD-19618251	Concept Masterplan including seven warehouse buildings and internal road network, with a Stage 1 development including bulk earthworks, road construction, construction and fit-out of two warehouse and distribution buildings and associated works	Approved
Cross Link Industrial Estate	SSD-81662708	Construction and operation of a 24/7 warehouse facility.	Preparation of EIS

Address	Reference	Development	Status
135 Badgerys Creek Road, Bradfield	SSD-77458970	Concept application including a mixed-use residential and commercial development.	Preparation of EIS
30 – 40 Martin Road, Badgerys Creek	SSD-82437463	Construction of a new waste transfer station building, plant maintenance workshop, staff office and amenities and use as a waste transfer station processing up to 300,000 tonnes per year putrescible General Solid Waste, FOGO and wood waste.	SEARs requested
475 Badgerys Creek Road	SSD-76913969	Aldi Automated Distribution Centre	Approved
225-245 Martin Road, Bradfield	SSD-97711727	Bulk earthworks to facilitate future warehouse development	Exhibition
225-245 Martin Road, Bradfield Project Maverick – Internal Works	SSD-97688711	Construction, fit-out and operation of 14 warehouses, active open space and amenities precinct, and internal estate infrastructure works.	Preparation of EIS
135 Lawson Road, Badgerys Creek	DA-1368/2021	Construction and operation of a concrete batching plant with a capacity to produce up to 170,000 m ³ of concrete per annum and associated transport depot.	Approved by NSW LEC (NSW LEC 1153 [2026]) – 25 March 2026

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

2.3 Agreements with Other Parties

No planning agreements are proposed as part of this SSDA at the time of lodgement.

Note: other State and Local development contributions will include:

- Regional Cycle Path – monetary contributions to be made under the SIC
- Martin Road Upgrade (Collector Road) – contributions to be made to Council and offset based on upgrades proposed to the frontage of Martin Road.

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 the table below.

Table 8 Strategic context

Plan	Detail
Draft Sydney Region Plan	The Draft Sydney Plan (Sydney Plan) was placed on exhibition on 10 December 2025 which sets a new 20-year strategic land use plan to direct future growth in the Sydney region. It replaces the 2018 Region Plan and the District Plans and introduces a new consistent, statewide approach for

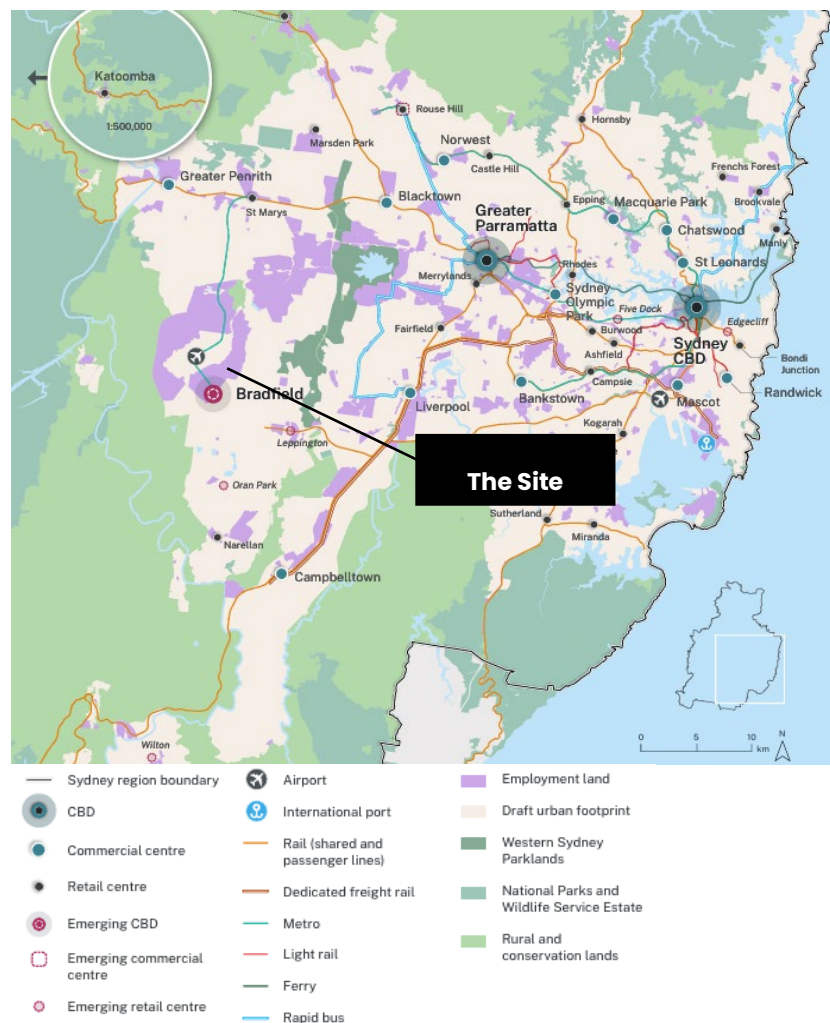
strategic planning. The Sydney Plan applies to the same area and LGAs as the 2018 Region Plan.

The plan identifies seven (7) core 'Sydney Priorities' which underpin the strategic vision for Sydney, which include: Aboriginal outcomes, housed, prosperous, connected, resilient, liveable and coordinated. These priorities are linked to twelve (12) 'Responses' which are tied to the strategic growth of Sydney. The applicable responses for the site and the Aerotropolis include:

- Response 4: Grow well-located jobs.
- Response 5: Align infrastructure to planned growth.
- Response 8: Secure an ongoing pipeline of productive industrial lands.

The plan includes actions for implementation over the next 5 years that are aligned with Sydney's growth over the next 20 years. In this period, the plan will inform local strategic planning (including an update to council LSPs) and assessment processes, infrastructure planning and prioritisation, and public and private investment decisions.

Figure 5 Sydney's employment network



Draft Statewide Policy for Industrial Lands

The Draft Statewide Policy for Industrial Lands for NSW was placed on public exhibition by DPHI, alongside the Draft Sydney Plan. The policy provides guidance as to how existing industrial lands can be optimised for more innovative and higher productivity uses, and how to plan for new industrial lands.

Plan	Detail
	There is strong acknowledgement that the needs for contemporary and emerging industries are changing. The need for the diversification, adaptation and intensification of industrial lands is critical to support industry, which is what this policy seeks to achieve. DPHI are taking a more considered and precinct-specific approach to their management of industrial land. The policy identifies three categories of industrial lands, including state, regionally and locally significant, which are defined based on their strategic importance and spatial contribution to economic activity. The categorisation determines how industrial lands are to be protected and also determines the level of flexibility permitted when considering alternative land uses. The site and the Aerotropolis are categorised as 'regionally significant' and the WSI is categorised as 'state significant'. The policy also introduces the potential for alternative uses to be proposed across all industrial lands categorised as regionally or locally significant. Alternative land uses can be proposed through a planning proposal, rezoning or SSDA pathways. The policy outlines the key considerations for assessing alternative uses which focuses on economic impact, public benefit, adjoining land impacts and alignment with zoning objectives. The opportunity for alternative uses are only applicable to the following categories: - Regionally significant industrial lands: While these lands should generally be retained for industrial, there is an opportunity for alternative employment uses to be considered subject to the proposals ability to demonstrate industrial land uses and the future industrial demand of the area are not compromised. It is specifically noted that residential is not supported on regionally significant industrial lands. - Locally significant industrial lands: Alternative employment land uses may be supported. In relation to non-employment uses, such as residential uses, this may be considered through a planning proposal only where alternative employment land uses are unviable. The proposed concept industrial masterplan aligns with the intended enterprise and light industrial land uses under the Precinct Plan.

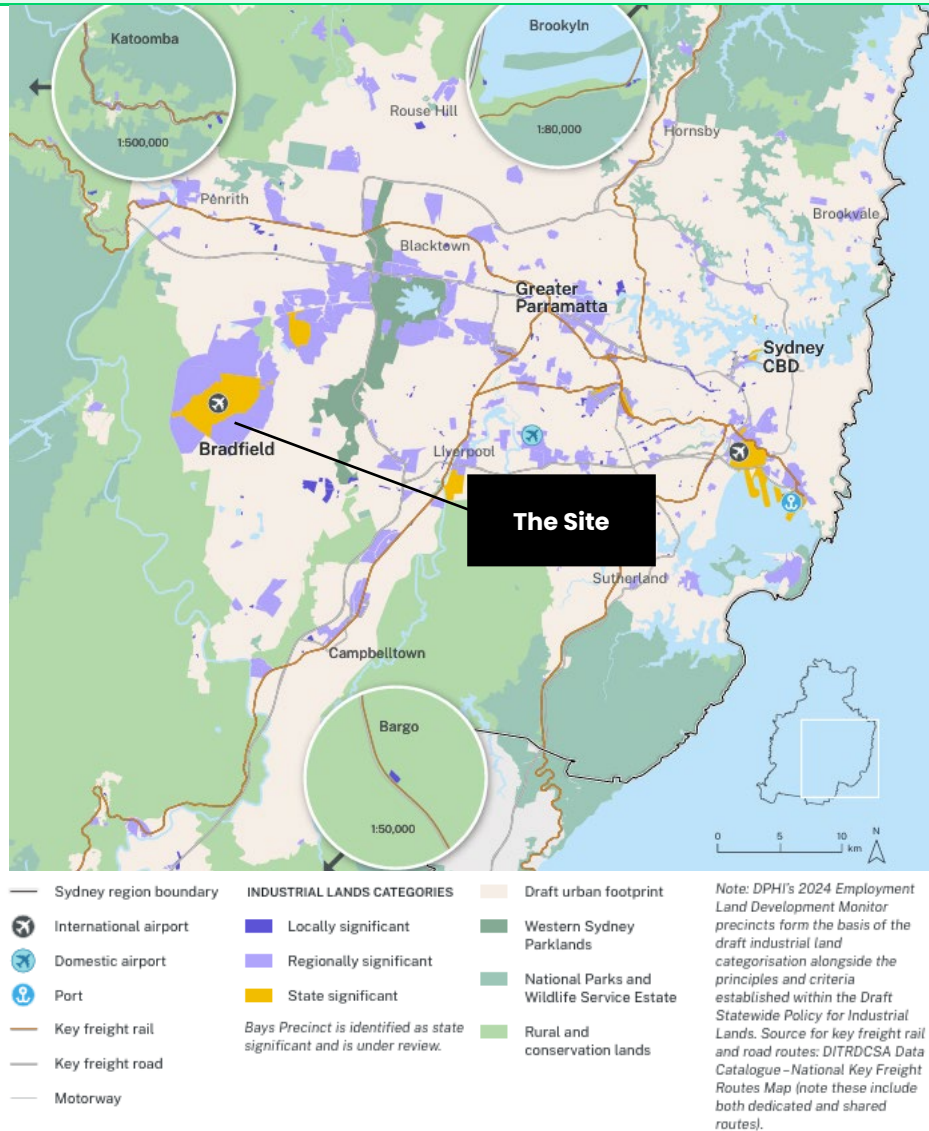


Figure 6 Industrial lands categorisation

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 City District.

The project is consistent with the Regional Plan for these reasons:

- The proposed development will provide modern warehouse and distribution spaces, diversifying employment opportunities in the Western Economic Corridor and Western Parkland City.
- The project will facilitate a 24/7 supply chain and safe freight movement by situating large format warehousing near future transport infrastructure and the WSI trade gateway.
- The development will leverage the economic opportunities presented by WSI and new city-scale infrastructure, creating jobs for the growing population in this significant growth area.
- High-quality industrial floorspace will be provided on enterprise zoned land within the Aerotropolis, supporting the project's objectives.

Plan	Detail
	▪ Integrated water management and landscaping strategies will be implemented to enhance and deliver a portion of the South Creek corridor. ▪ The project will avoid high biodiversity land and incorporate strategies to enhance areas of the site zoned ENZ. ▪ The development will maximise tree canopy with significant planting across the site whilst balancing aviation safeguarding requirements.
Western Parkland City District Plan	The Western Parkland City District Plan (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 project is consistent with the District Plan for these reasons: ▪ The project will provide additional large format warehousing in the Aerotropolis ENT zone, addressing the strategic need for such facilities in Western Sydney and WSI. ▪ Local biodiversity will be protected through the project's focus on development in the ENT zone and the inclusion of extensive landscaping in both ENT and ENZ zones, thereby enhancing canopy cover. ▪ The project will contribute to the expansion of tree canopy and the realization of the South Creek Green Grid. ▪ The project's design and planning have been guided by a landscape value assessment, a Cultural Overlay Framework, and an Aboriginal Cultural Heritage Assessment Report (ACHAR), which includes consultation with local indigenous groups.
Liverpool Local Strategic Planning Statement – Connected Liverpool 2040	The Connected Liverpool 2040 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 Liverpool. The project is consistent with the LSPS for these reasons: ▪ The industrial development aligns with the vision of Connected Liverpool 2040 by promoting economic growth, job creation and addressing the continued demand for industrial floorspace in the Aerotropolis, a key strategic growth area identified in the plan. ▪ The project supports the plan's objective of enhancing connectivity and transport infrastructure by situating the development close to future transport links, thereby facilitating efficient freight movement. ▪ The development's commitment to protecting local biodiversity and increasing tree canopy aligns with the environmental sustainability goals outlined in the Liverpool Local Strategic Planning Statement. ▪ The project's consultation with local indigenous groups and its focus on cultural heritage assessment aligns with the plan's emphasis on community engagement and preserving cultural heritage.
Liverpool Industrial and Employment Land Strategy, 2020	The project is consistent with the Liverpool Industrial and Employment Land Strategy for these reasons: ▪ The project aligns with the Liverpool Industrial and Employment Land Strategy 2020 by creating diverse job opportunities, supporting the strategy's goal of economic growth and employment generation.

Plan	Detail
	▪ The project's provision of modern warehouse and distribution spaces supports the strategy's aim to diversify and modernise the types of industrial and employment lands available in Liverpool. ▪ The development's strategic location near future transport infrastructure aligns with the strategy's focus on improving accessibility and connectivity of industrial and employment lands. ▪ The project's commitment to environmental sustainability, including protection of local biodiversity and increasing tree canopy, aligns with the strategy's emphasis on sustainable and responsible development of industrial and employment lands.
Future Transport Strategy 2056	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 for these reasons: ▪ The project aligns with the NSW Future Transport Strategy 2056 by situating large format warehousing near future transport infrastructure, supporting the strategy's goal of efficient freight movement and connectivity. ▪ The project's 24/7 supply chain support aligns with the strategy's vision of a future where transport services operate round-the-clock to meet demand. ▪ The development's strategic location in the Aerotropolis supports the strategy's focus on developing transport-oriented hubs that integrate land use and transport planning. ▪ The project's commitment to safe freight movement aligns with the strategy's emphasis on safety in the transport system.
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. ▪ The project aligns with the 'Better Fit' objective by being contextually responsive, with its design and function fitting well within the strategic growth area and contributing to the local economy. ▪ The project's commitment to environmental sustainability and efficient operation aligns with the 'Better Performance' objective, demonstrating a commitment to long-term sustainability and operational efficiency. ▪ The development's provision of diverse job opportunities and consultation with local indigenous groups aligns with the 'Better for Community' and 'Better for People' objectives, promoting social inclusion and enhancing local cultural values. ▪ The project's strategic location near future transport infrastructure and provision of modern warehouse spaces aligns with the 'Better Working' objective, promoting efficient connectivity and functionality. ▪ The development's focus on delivering high-quality industrial floorspace at a strategic location aligns with the 'Better Value' objective, demonstrating a commitment to delivering value for money.

Plan	Detail
	The project's commitment to enhancing the site with significant planting and landscaping and retention of ENZ and HBV areas aligns with the 'Better Look and Feel' objective, contributing to a visually appealing and high-quality built environment.
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. - The project aligns with the 'Connecting with Country' framework by consulting with local indigenous groups, respecting and acknowledging the traditional custodians of the land. More specifically, the proposed development is committed to integrating the principles set out within 'Recognise Country: Guidelines for Development in the Aerotropolis' (November 2022), which promote the embedding of Aboriginal perspectives, knowledge systems and cultural values into urban development. This has been achieved through engagement with Traditional Custodians and a design process that honours the Cabrogal people's deep and ongoing connection to country. - The project's focus on cultural heritage assessment aligns with the framework's emphasis on understanding and respecting the cultural significance of the site, ensuring the design respects and enhances local cultural values. - The development's commitment to retaining the significant areas of the site zoned ENZ, protecting local biodiversity, extensive deep soil area and tree canopy aligns with the framework's principle of caring for Country, demonstrating a commitment to environmental responsibility and sustainability. - The project's design and planning process, informed by an Aboriginal Cultural Heritage Assessment Report (ACHAR), aligns with the framework's objective of embedding Aboriginal knowledge and perspectives in the design process.
Western Sydney Aerotropolis Plan 2020	The Western Sydney Aerotropolis Plan, 2020 (WSAP) is a strategic blueprint for the development of a new economic hub surrounding the Western Sydney Airport. It outlines the vision and planning principles for creating a high-skill jobs precinct, fostering education and innovation, and delivering infrastructure, housing, and environmentally sustainable urban spaces to support the growth of Western Sydney. The project is consistent with the strategic outcomes for the Badgerys Creek Precinct for these reasons: - The project aligns with the strategic outcome of providing an appropriate and activated interface with Wianamatta–South Creek through its integrated water management and landscaping strategies. - The project's strategic location and design considers future access to the Eastern Ring Road and the Airport Commercial Precinct, supporting efficient connectivity and integration.

Plan	Detail
	▪ The development has considered interface treatments between existing adjacent quarrying operations and the proposed development, ensuring a harmonious integration with the surrounding environment. ▪ The project supports the strategic outcome of facilitating two modern, adaptable industrial/warehouse and distribution spaces. ▪ As required by section 35 of the EP&A Regulation an assessment of consistency against the WSAP is provided at Appendix B. In addition, the proposed development is consistent with the Planning Principles of the WSAP. ▪ Productivity: The proposed development supports a productive aerotropolis, by ensuring the site is accessible and well-connected to the existing and future transport network of the Badgerys Creek precinct. The design satisfies airport safeguarding controls and protects the operations of the airport. ▪ Sustainability: A landscape-led approach was supported throughout the design process to maximise biodiversity outcomes and to create a green and cool warehouse. The development is also employing sustainable design strategies to maximise water and energy efficiency. ▪ Infrastructure and collaboration: The proposed development will locate utility and transport infrastructure in secure corridors that align with land uses. ▪ Liveability: The vision of the site respects the existing and future character of the Badgerys Creek precinct. The public domain interfaces support a green, landscaped boundary with tree planting. This is combined with an Indigenous public art strategy.
Aerotropolis Sector Plan 2025	The Aerotropolis Sector Plan was published in February 2025 and titled 'A plan to enable development in the Western Sydney Aerotropolis'. It will play a critical role in accelerating momentum for infrastructure in the Aerotropolis, ensuring it is delivered in the right place at the right time. The sector plan identifies: ▪ approximately 4,448 hectares (equivalent to at least 14 years' supply) of employment land could be serviced by 2030. ▪ approximately 5,252 hectares (equivalent to at least 17 years' supply) by 2040. This will ease the cost of doing business, improve the state's ability to be competitive and secure economic opportunities that could be lost interstate. The efficient servicing of this land will boost the supply pipeline of serviced employment land in Sydney. A development activity review of private sector development is illustrated for the Aerotropolis and identifies the site and proposed development as 'In Planning / Under Assessment'. One of the key future infrastructure considerations to accommodate forecast growth and development of this site is the need to provide critical minor upgrades to improve safety and access on the existing road network in and around the WSI Airport. This includes Martin Road, Elizabeth Drive, Pitt Street and several others noting that the plan identifies the delivery of the Eastern Ring Road as a 2040 priority.

3 Project Description

The following sections of the EIS summarise the key numeric components of the proposed development and describe 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 **Table 9** and shown the **Figure 7** below. A copy of the Architectural Plans is provided as **Appendix K**.

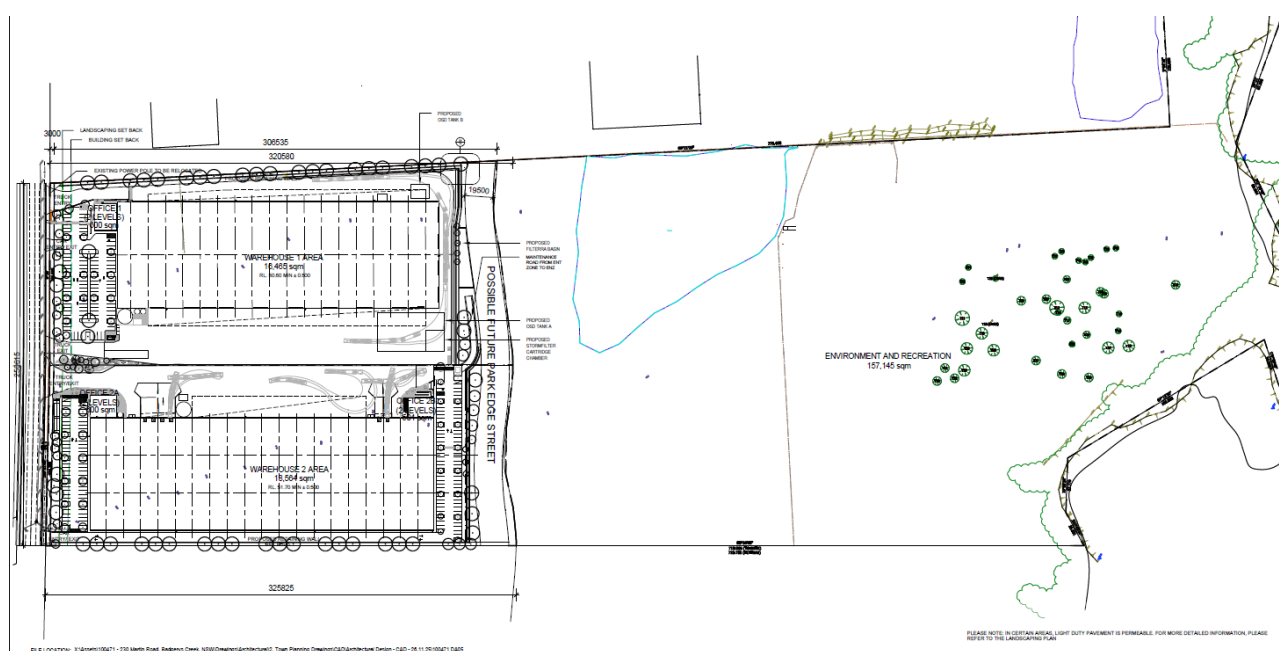
Table 9 Project Summary

Component	Details
Project Area	The site has a total area of 24.28 ha. Approximately 81,021 m ² will be affected by the project (excluding the potential park edge street which separates ENT land from ENZ).
Proposed Use	<u>Lot 1</u> Large format warehouse with ancillary office and manufacturing (including steel cutting) <u>Lot 2</u> Large format warehouse with ancillary office
Project Description	The project comprises: ▪ Bulk earthworks and site preparation works. ▪ Utility services and stormwater infrastructure (interim and ultimate scenarios) excluding the regional stormwater basin. ▪ Subdivision of the existing allotment into three (3) new allotments. ▪ Construction and operational use of two warehouse and distribution centres with ancillary office and manufacturing (Warehouse 1 only). Approval is sought for the fit-out of Warehouse 1. ▪ Landscaping ▪ Site Access
Subdivision	▪ Proposed Lot 1: 4.19 ha ▪ Proposed Lot 2: 9.1ha ▪ Proposed Lot 3: 10.52 ha
Warehouse 1 (Lot 1)	▪ Gross Floor Area (GFA): – Warehouse and distribution centre – 16,465m² – Ancillary office – 600m² – Amenities block – 37m² – Total – 17,102m² ▪ Maximum Building Height = 12.95m ▪ 24 loading docks ▪ Access:

Component	Details
	– Truck entry driveway in the northwest corner of the site – Combined car park entry / exit located to the south of the truck entry – Truck exit driveway located in southwest corner of Lot 1
Warehouse 2 (Lot 2)	▪ GFA: – Warehouse and distribution centre – 18,564m² – Ancillary office building 2A – 600m² – Ancillary office building 2B – 504m² – Total – 19,668m² ▪ Maximum Building Height = 12.65m ▪ 18 loading docks ▪ Access: – Combined car park entry / exit driveway located opposite Office 2A – Truck entry / exit driveway located to the north of the car park entry / exit
Car Parking	<u>Lot 1</u> 86 spaces <u>Lot 2</u> 119 spaces
Landscaping	<u>Lot 1</u> 4,206m² <u>Lot 2</u> 3,412m²
Earthworks	Bulk cut and fill will be required to achieve flat pads for industrial development; access to the site from Martin Road; and flood immunity. The proposed surface grading will follow the existing site topography.
Infrastructure Upgrades	<u>Interim:</u> ▪ The proposal includes provision for on-site stormwater detention that can appropriately service the site from a stormwater management perspective, until such a time as the regional stormwater basin is delivered by Sydney Water. ▪ Noting the low traffic generation proposed, the proposal will have a negligible material impact to the performance of the external road network when compared to the existing site. Note: ongoing discussions with Council and investigations are currently being undertaken to determine whether the proposal will generate the requirement for pavement upgrades along a portion of Martin Road. ▪ The proposal includes provision to upgrade the frontage of Martin Road to accommodate the future Collector Road in accordance with the Precinct Plan and Liverpool Aerotropolis 7.12 Contributions Plan (7.12 Plan) by means of a half-width upgrade for the length of the frontage only.

Component	Details
	- The proposal accommodates the possible future provision of a corridor for the future Park Edge Street – which is not a contributions road and will be delivered by the relevant roads authority (Council), subject to separate planning approval processes. Connections to the Park Edge Street will be provided by a future Riparian Street (contributions road) which is located in the property directly north providing a permeable and accessible solution to the future Park Edge Street. The subject proposal does not propose the dedication of land or carrying out of works for the future Park Edge Street. Ultimate: - The proposal will provide connection to the future regional stormwater basin once constructed by Sydney Water and the regional scheme is operational. - The proposal will utilise the future Collector Road and Eastern Ring Road for access to regional road network once delivered. - Ongoing discussions are required with Council (and adjacent landowners) to understand the full extent of upgrades required to Martin Road.
Employment opportunities	Construction: 60 FTE jobs Operational: 108 FTE jobs
Estimated Development Cost	\$108,866,194 (excluding GST) The Estimated Development Cost (EDC) has been calculated in accordance with DPHI's required form and is provided within the EDC Report located at Appendix T which also satisfies DPHI's requirements.
Staging/Phasing	The proposal will be constructed over a single construction phase. Note: staged construction certificates would be issued; however, the proposal does not constitute staged development pursuant to the Act.

Figure 7 Proposed Site Layout



Source: EMKC3 (2026)

3.2 Detailed Description

3.2.1 Project Area

The project area is defined by the underlying land use zones which includes ENT in the western portion of the site fronting Martin Road, and ENZ to the east which fronts Wianamatta (South) Creek.

Part of the site is also identified as a Flood Planning Area under the Precincts SEPP mapping, as it is located within the 1% Annual Exceedance Probability. This includes all of the land zoned ENZ as well as a small part of the ENT zoned land.

The proposed buildings, car parking, hardstand, and access will be located entirely within the land zoned ENT Enterprise. A small part of both warehouses, as well as areas of car parking, will extend into the Flood Planning Area however these areas have been appropriately designed to mitigate any potential adverse flood impacts.

No development is proposed within the ENZ land with the exception of landscaping (tree planting). The proposed development relies on interim solutions and does not include works to construct the regional stormwater infrastructure (basin). Notwithstanding, the proposal has been designed integrate with regional basin once constructed by Sydney Water and its regional stormwater network is operational.

The proposed development allows for the future provision of a Park Edge Street to the rear of the warehouse buildings consistent with the location identified in the Precinct Plan. The design does not preclude the delivery of the future Riparian Street proposed in the Precinct Plan and trunk drainage corridor within the finalised Sydney Water scheme plans to the north of the site.

It is understood that the Riparian Street will be designed and delivered by Council and will be funded by contributions collected under the Aerotropolis 7.12 Plan.

3.2.2 Site Preparation Works

3.2.2.1 Bulk Earthworks

Bulk earthworks are proposed across the western part of the site to establish level 'pads' for the two large format warehouse buildings, enable suitable access from Martin Road and to achieve flood immunity.

The site is stepped in accordance with the prevailing topography which means a Finished Floor Level (FFL) of RL50.00 is proposed for Warehouse 1 and RL52.00 for Warehouse 2.

Fill works will generally be located in the eastern part of the ENT zoned land (part of which is currently flood affected) and 'cut' works predominantly located along the western part of the site close to Martin Road. The deepest areas of cut are proposed in the southwestern corner of the site, and the greatest amount of fill is proposed along the eastern boundary of the development pads.

In total, the proposed earthworks comprise:

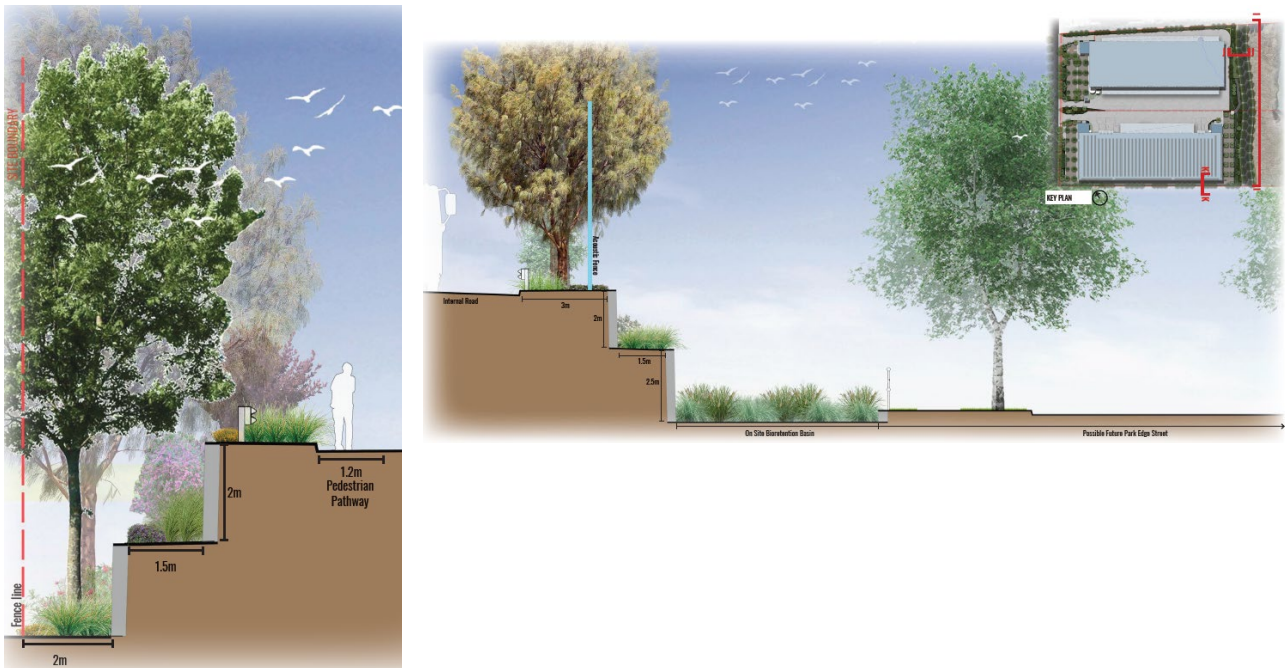
- -44,225m³ cut
- 80,492m³ fill
- 36,267m³ net import balance

Retaining walls are proposed along the entire length of the site's northern, eastern and southern boundaries as well as between Warehouse 1 and Warehouse 2; along the western elevations of both buildings and around parts of the loading areas in Lot 2. In the south and northern part of the site, the proposed retaining walls will be setback two metres from the site boundary. This setback area will solely comprise landscaping.

The retaining walls will range in height from 2 to 4.5 metres. Along the northern boundary of the site and to the east of the proposed buildings, the retaining walls above 2 metres in height will be tiered and

incorporate planting and other landscaping. The retaining wall designs remain consistent with the provisions of the WSADCP and are illustrated in **Figures 8-10**.

Figure 8 Section Plans – Tiered Retaining Walls



Picture 7 Tiered retaining walls along site's northern boundary
Picture 8 Tiered retaining walls along the future Park Edge Street interface

Source: Geoscapes

Source: Geoscapes

Figure 9 Tiered retaining walls elevation – view from future Riparian Street



Source: Geoscapes

An upstream diversion swale (1m base x 0.3m deep within 2 batters) is proposed adjacent to the southern boundary of the site and will be vegetated. The swale will be located next to the retaining wall on the southern boundary.

Figure 10 Proposed Swale



Source: Geoscapes

3.2.2.2 Utilities and Services

A stormwater drainage reticulation system will collect stormwater from the proposed warehouse buildings and hardstand areas. Stormwater will be directed to one of two underground OSD tanks located to the north and south of Warehouse 1 respectively. The OSD tanks will in-turn discharge to a Filterra bioretention basin located to the south-east of Warehouse 1 and north-east of Warehouse 2. Prior to the construction of the regional stormwater infrastructure in the eastern part of the site, stormwater collected in the bioretention basin will flow to the ENZ zoned land. Once the regional stormwater infrastructure is operational it will receive flows from the development's bioretention basin (subject to approval).

A separate stormwater drainage connection will be constructed parallel to the site's northern boundary to convey the upstream external catchment towards South Creek. The connection will bypass the bioretention basin. An upstream diversion swale will also be constructed along the southern boundary of the site.

Precinct trunk and reticulation amplifications for potable water will be delivered by Sydney Water. The proposed development will be connected to this precinct trunk infrastructure in the long term. However, the timeframes for the delivery of this infrastructure have not been confirmed. An interim solution will therefore be implemented in consultation with Sydney Water as part of the assessment process should the proposed development be occupied prior to the delivery of the trunk potable water infrastructure. Any post-approval matters to manage the interim solution can be appropriately managed.

The proposed development will connect to a wastewater trunk main, which will be delivered by Sydney Water as part of Stage 1 of the South Creek wastewater network. The trunk wastewater main will be located to west of South Creek and transfer flows to the Upper South Creek Advanced Water Recycling Centre (AWRC). The development will connect to the main via a maintenance hole within the site. It is anticipated that the trunk main will be delivered in 2026. The Applicant will continue to engage with Sydney Water to agree on an interim solution should the proposed development be occupied prior to the completion of the Sydney Water wastewater infrastructure.

The proposed development will be serviced via existing electrical and telecommunications infrastructure located along and beneath Martin Road.

A connection will be installed to service the proposed development from the existing high pressure gas main located beneath Martin Road.

3.2.2.3 Site Access

Five new driveway crossovers will be constructed along Martin Road to provide truck and car access to the two proposed lots/future warehouses. The designated truck entry/exit driveways have been designed for the largest design vehicle, which is a 30m B-double. Given the specific requirements of Metroll described below, it is not possible to consolidate vehicle access for both lots.

In the interim, the operations will rely on Martin Road in its existing state to facilitate access noting the low traffic generation associated with the proposal. Ongoing discussions will occur during the assessment phase with Council to understand timing for future designs being established for Martin Road which is envisaged to transition into a Collector Road.

To ensure day-one operations can be achieved, based on the traffic generation assumptions predicted by Ason Group (discussed in **Section 6** of this EIS), the Applicant will undertake further investigations and consultation with Council to determine whether interim pavement upgrades (including the extent of) are to be undertaken. This will be informed by the following parameters and form part of ongoing discussions with Council in the future:

- Existing pavement conditions
- Existing and approved capacity for Martin Road
- Projected traffic volumes for the proposal and cumulatively

The ultimate scenario will allow for the development to utilise the future Martin Road/Eastern Ring Road connection leading up to Elizabeth Drive.

Accordingly, the proposal has considered the relevant interim arrangements required to provide assurances that the development can achieve 'day-one' operations.

3.2.3 Proposed Uses

The proposal seeks approval for two large format warehouse buildings on the site with ancillary office and amenity facilities.

Warehouse 1 – Metroll

Warehouse 1 will be occupied by Metroll and will have an ancillary manufacturing component, which is permissible with consent in the ENT zone.

Metroll is a leading Australian manufacturer and supplier of steel building products including roofing, cladding, rainwater, structural and fencing. Its offering comprises supply roll formed products and accessories to the building and construction industry across NSW and is tailored for large scale construction. Products will be manufactured on site using state of the art automated and energy efficient equipment. The products will subsequently be packaged, loaded and transported from the facility. The activities associated with the proposed Metroll tenancy are described in section 3.2.2.5 below.

Warehouse 2 (Lot 2)

Warehouse 2 has been designed to enable occupation by one or two separate tenants. Tenant(s) are yet to be confirmed for the facility. However, the proposed building has been designed to accommodate typical warehouse or distribution centre occupiers and will be used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale.

The purpose of the proposed ancillary offices and amenity spaces are to support the function of the respective warehouse or distribution tenancies and enable the provision of back-of-house services. Each

office building will be occupied by the same tenant of the respective warehouses. The proposed office buildings are permissible with consent and, having regard to the guidance on considering ancillary development, evidently meet the test of ancillary development.

3.2.3.1 Activities

The proposed development comprises the construction of two large format warehouses with ancillary office space and in the case of Warehouse 1 – Metroll an ancillary manufacturing component.

On-site activities associated with the proposed warehouse or distribution centre use will include:

- Loading, unloading and handling of goods and materials.
- Heavy service vehicle movements and car parking.
- Arrival and departure of employees.
- Handling of goods and materials for the purposes of storage and distribution.
- Separate vehicular entrance / exit driveways are proposed for each lot to enable the warehouses to function independently to meet specific operational requirements for Metroll (outlined below) and to ensure no movement conflicts with future tenants for the southern warehouse(s).

Warehouse 1 – Metroll

Warehouse 1 will be occupied by Metroll and will contain an ancillary manufacturing component related to the cutting and / or processing of steel. It is anticipated that over 10,000 tonnes of metal steel will be processed within the Metroll warehouse each year, which exceeds the threshold limit set out in Schedule 1 (part 26) of the Protection of the Environment Operations Act 1997 (POEO). Accordingly, a licence for premises-based activities will be required.

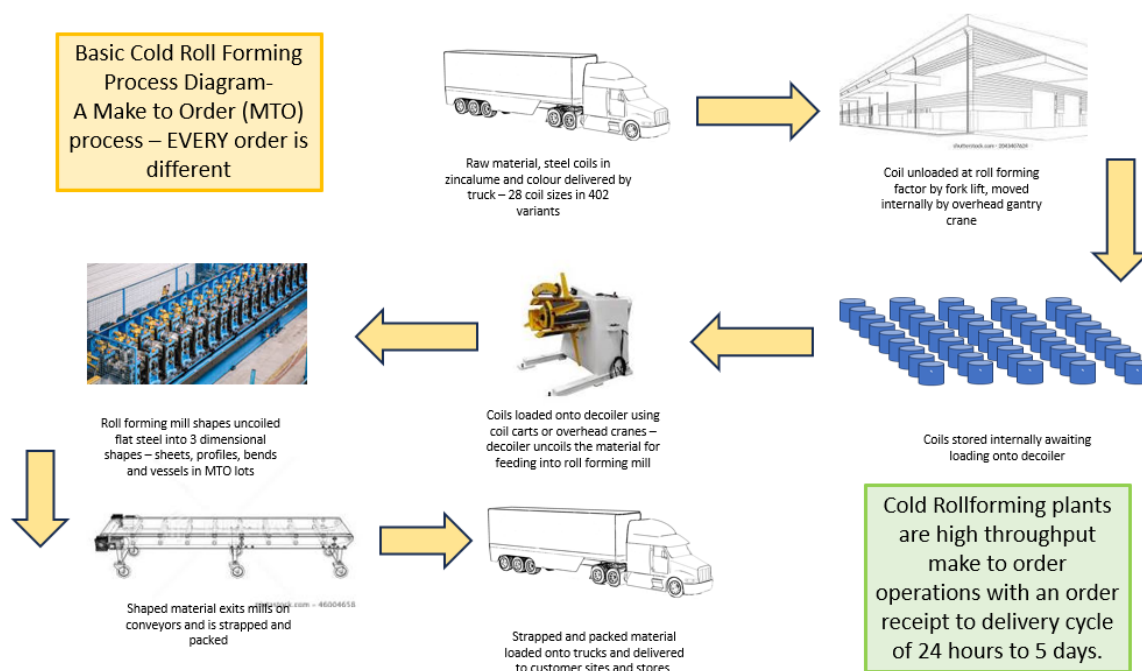
Metroll is a 'rollforming' business. Rollforming businesses predominately manufacture finished goods as bespoke or as 'make to order'. Make to order items account for 85–90% of production, with a lead time to despatch from receipt of order of generally between 1 and 5 working days. However, in some cases, lead times can be as short as 12 hours or same day.

Products that are made to stock are stored on site in racks and bundles.

In summary, the manufacturing process comprises:

- Raw material in the form of steel coils in zincalume and colourbond of various widths are delivered to the site. Coils are unloaded by heavy duty fork lift. The coils are moved internally by heavy duty forklift and overhead gantry cranes. Coils are stored internally and staged in 'coil farms' awaiting use.
- Coils are moved from the coil farm to 'uncoilers' by gantry crane. The 'uncoilers' unroll the coil creating flat sheets.
- As the steel is unrolling it is fed into multi-stage cold form 'roll formers' where the flat sheet is transformed into three dimensional shaped products. These shaped products include sheets (e.g. corrugated iron, commercial roofing sheets, fencing sheets); down pipes; gutters; and post and rails for fencing. Some flat sheet is also bent at angles to create flashings.
- Once the flat sheet is shaped it exists the roll former on a conveyer and individual orders are strapped and packed. Individual flashings are placed in racks ready for loading onto trucks.
- Strapped and packed orders are staged at various locations including on hard standing awaiting loading. Some products can be loaded directly from the building onto the truck using gantry cranes. Each individual order is then loaded onto trucks by side loader, fork-lift or overhead gantry crane. Loading typically commences at 5pm and is completed by between 1am and 2am the next day.
- Trucks generally depart site from 4am onwards to deliver the products. Some customers will visit the Metroll facility to pick up urgent orders and accessories.

Figure 11 Metroll manufacturing process



Source: Metroll

Table 10 identifies the indicative equipment requirements for the proposed Metroll facility.

Table 10 Indicative machinery and equipment list for the Metroll warehouse

Equipment Type	Equipment
Structural Components	- Purlin Mill x 2 - Roof Batten Mill - Top Hat Mill x2 - Fence post x 1 - Fence rail x1 - Bridging channel mills x 2 - Bridging speedy spacer mill x 1
Sheeting	- Corrugated – residential and commercial x 2 - Concealed Fix Commercial Deck x 2 - Pierce fixed commercial deck x 2 - Specialist Panel -Metro Span - Specialist Panel Metro Clad - Standing Seam Architectural panel x 2 - Tunnel Wrapper x 1 - Fence Sheeting Mills x 3
Rainwater	- Barge mill - Rolltop ridge

Equipment Type	Equipment
	▪ Tile valley ▪ Downpipe 1—x 55 ▪ Downpipe 100 x 75 ▪ Hi Front Quad Gutter ▪ Half round half back gutter ▪ Fascia Gutter ▪ Fascia Metal
Support	▪ Coil tipper ▪ Maintenance shed ▪ Various lathes, milling machines, grinders and tools ▪ Air compressors ▪ General racking ▪ Specialist racking ▪ Hard stand Christmas tree racking

Figure 12 Warehouse 1 internal layout



Source: EMKC3

Warehouse 2 (Lot 2)

Warehouse 2 has been designed so to enable occupation by one or two separate tenants. Offices are located at either end of the warehouse and serviced by independent car parks. This configuration allows the warehouse to be divided into two distinct facilities if required, further supported by pedestrian pathways and bicycle parking for accessibility.

A separate car entry / exit driveway is proposed further south on Martin Road, which will provide direct access to the western car park. An internal access road is proposed to the south of the warehouse, which will connect to a second area of car parking near the lot's eastern boundary.

3.2.3.2 Operations

Metroll intend to operate 24 hours a day five days per week. The ancillary manufacturing component will also operate during these hours. The long loads associated with the proposed use will require pilot escort and site departure during the early hours of the morning. Warehouse 2 is proposed to operate 24 hours a

day seven days a week. The proposed hours of operation are consistent with the 24/7 operation of WSI and the wider Aerotropolis.

3.2.4 Layout and Design

3.2.4.1 Site Layout

The site layout has been arranged to accommodate two separate warehouses with ancillary offices, landscaping, and car and heavy vehicle parking (refer to the figure below). The buildings are located within the western part of the site and are entirely within the land zoned ENT. Works in the eastern part of the site (i.e. the part of the site zoned ENT) are limited to minor tree planting.

Both warehouses are regular (rectangular) in shape, which responds to the configuration of each proposed lot. Each warehouse will have a large floorplate and will comprise single storey buildings with a maximum building height of 12.95m (Warehouse 1) and 12.65m (Warehouse 2) respectively. Provision is made for the installation of solar panels on both buildings. Landscaped setbacks are proposed along all boundary interfaces of the site, as described in Section 3.2.8. Retaining walls are proposed along the northern, eastern and southern boundaries of the site. Landscaping will be provided adjacent (external) to these retaining walls.

Dedicated hardstand areas are proposed for each warehouse. The hardstand areas will include loading docks and will be large enough to enable vehicles to safely manoeuvre. Waste storage areas will be located externally within each lot.

The western setback to Martin Road will include land required for future widening of Martin Road. An area within the site (to the east of the proposed buildings) has also been retained for a future Park Edge Street road corridor (to be acquired, constructed and delivered by the relevant roads authority when required). Interim access to the ENZ zoned land will be provided from the ENT part of the site, with a direct connection to the future Park Edge Street corridor to the east of the site, with ultimate access being provided to the potential Park Edge Street, upon acquisition and delivery of the Riparian Street identified within the site to the north.

Further, the northern boundary includes provisional setbacks to cater for the future Riparian Street/trunk drainage corridor located within the adjacent lot per the finalised Sydney Water Scheme Plans.

Figure 13 Site Layout Plan



Source: EMKC3, 2026

Warehouse 1 has been designed to meet Metroll's specific operational requirements and to accommodate a range of freight vehicles including A-triple trucks. A one-way access route will allow trucks to enter the site via its northwestern corner, circumnavigate the building, and exit back onto Martin Road in the southwestern corner. Loading and unloading will be undertaken from both the northern and southern elevations of the building. A single car entry / exit will be provided to Warehouse 1, which will be entirely segregated from the truck access routes and provide access to the car park.

A combined truck entry / exit driveway is proposed in the north-western corner of Lot 2. Trucks will enter and exit the lot onto Martin Road via this driveway. The driveway will connect to the large area of hardstand proposed to the north of Warehouse 2, which will provide sufficient space for trucks to load / unload and safely manoeuvre. Trucks will not have access to any other part of the site.

The site plans within the Architectural Plans demonstrate swept paths which illustrate the site's suitability and spatial capabilities to facilitate the proposed operations and requirements for Metroll.

Figure 14 Proposed Access and Movement



Source: EMKC3, 2026

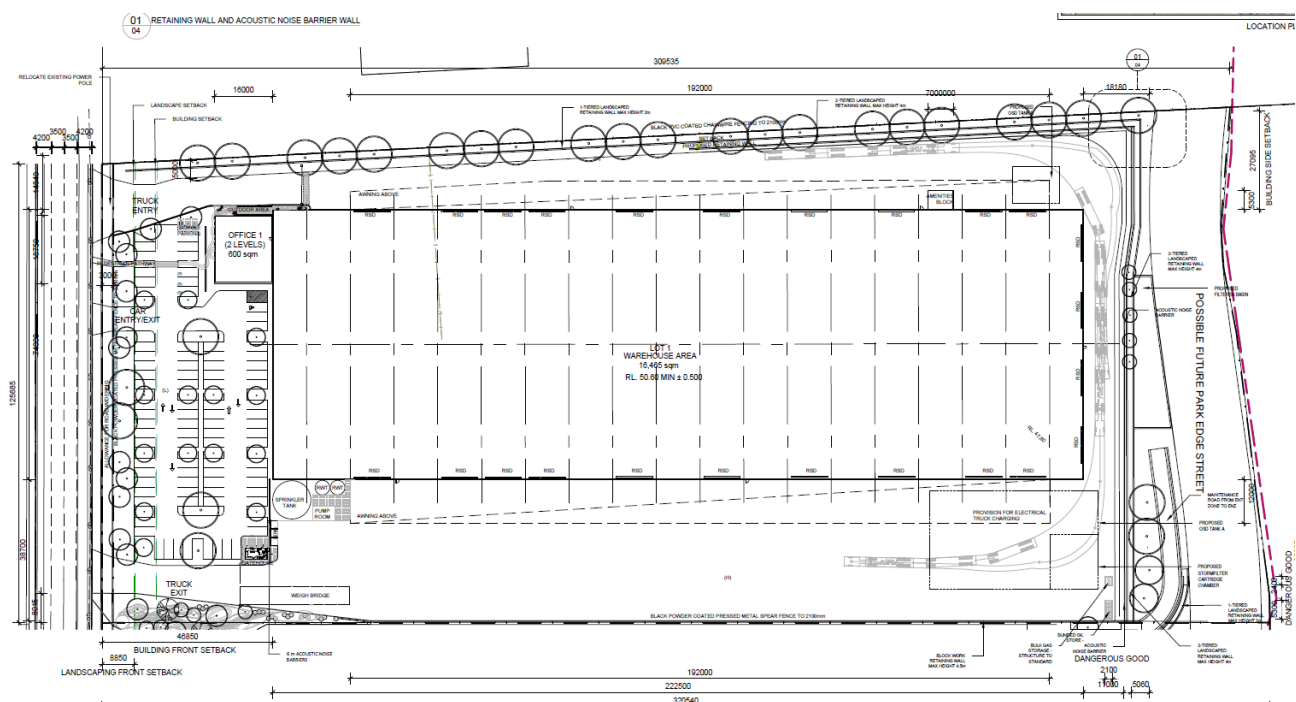
A detailed description of each Lot is described below.

Lot 1 – Warehouse 1

Warehouse 1 will occupy just under half of the total lot area (refer to the figure overleaf). A two storey office component will adjoin the north western façade of Warehouse 1 facing Martin Road. The office component will be 7.85m in height and contain open floor office; lunchroom; amenities; reception and first aid facilities; and meeting rooms. The office component has been oriented north to maximise the amount of sunlight received. Warehouse 1 will be setback 46.85 metres from the Martin Road frontage. Nearly nine metres of the front setback will be fully landscaped. A large setback is proposed to the future Park Edge Street to the rear. The building will be setback a maximum of 27.1 metres from the northern boundary and 38.9 metres from the southern boundary.

A weighbridge will be provided to the south of Warehouse 1 for vehicles exiting the site. A sprinkler tank, two rainwater tanks and a pump room are also proposed to the south of the building.

Figure 15 Lot 1 Proposed Site Plan



Source: EMKC3, 2026

Lot 2 – Warehouse 2

Warehouse 2 will occupy just over half of lot 2 (refer to the figure overleaf). Warehouse 2 will be designed for occupancy by a single or two separate tenants. The building can be arranged to accommodate independent operation. Two ancillary offices are proposed at either end of the warehouse.

Outdoor communal amenity spaces will be provided adjacent to each office. The design and location of the offices will allow for Warehouse 2 to be occupied by a single or two separate tenants. The warehouse building will be setback 30.45 metres from Martin Road. Approximately 10.9 metres of this front setback will be landscaped. Warehouse 2 will be setback up to 33 metres from the Park Edge Street to the rear and have side setbacks of 10.5 metres (to the south) and 36.41 metres (to the north) respectively.

A larger hardstand area is proposed in Lot 2 to enable vehicles to enter and exit the site via the same driveway in the north western corner of the lot. An awning will be provided above the loading docks for weather protection. Waste bins will be located within the area of hardstand adjacent to each office building.

In addition, a sprinkler tank and pump room will be provided adjacent to the north of the warehouse. Rainwater tanks will be installed next to each office.

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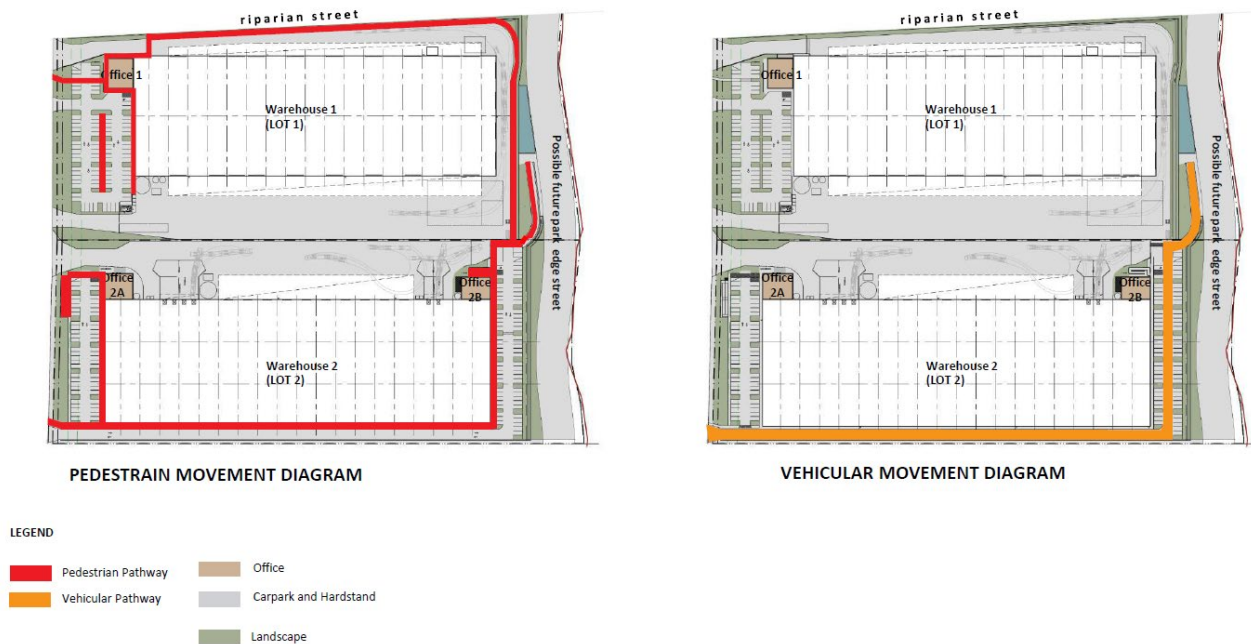
3.2.5 Access and Circulation

- A truck entrance driveway is proposed in the northwest corner of Lot 1. Trucks will circumnavigate the warehouse via an internal one-way access route and exit the site via a separate driveway on Martin Road. A gatehouse will be located close to the site exit.
- A single combined truck entry / exit driveway is proposed on Martin Road to Lot 2.
- Access to the car parks for each lot will be provided via two separate entrance / exit driveways located on Martin Road. These driveways will enable each car park to be accessed independently.

Pedestrian pathways will be provided within the site as shown in the figure overleaf. The pathways will provide safe access for workers and visitors on foot, including to the ENZ zoned land to the east.

SSD-65529236 EIS - 230 Martin Road, Badgerys Creek

Figure 17 Pedestrian pathways



Source: EMKC3, 2026

3.2.6 Park Edge Street Corridor Reservation

The proposed development has been designed to accommodate a future corridor for the Park Edge Street, identified in the Precinct Plan to the east of the warehouses which will be delivered by the relevant roads authority (Council), subject to separate planning approval, acquisition, construction and delivery processes. The Park Edge Street is not a contributions road under Council's 7.12 Plan. The design of the proposed development allows for the future Park Edge Street to be located entirely within the ENT zone generally consistent with the location shown in the Precinct Plan.

The Park Edge Street will provide future access to the future regional stormwater infrastructure (to be delivered by Sydney Water) envisaged by the Precinct Plan in the eastern part of the site, as well as service a future regional cycle path. It is noted that the Park Edge Street is not required for any operational aspect of the development nor for vehicular and/or other access. Direct access to the site will be maintained via Martin Road. In the interim, maintenance access to the bioretention basin will be provided via a maintenance road to be constructed by the applicant and located to the east of the warehouses. A pedestrian pathway will also be constructed adjacent to the maintenance road and provide access to the ENZ zoned land to the east for workers.

The proposed warehouses are setback from the future Park Edge Street by 18.18 metres (Warehouse 1) and approximately 36 metres (Warehouse 2). The setback will contain parking, hardstand and a landscaped strip immediately adjacent to the Park Edge Street. A bioretention basin is also located adjacent to this future road corridor.

Boundary fencing will be installed along the western interface of the Park Edge Street. An acoustic wall will also be located to the west of the Park Edge Street as detailed further in section 6 below. The acoustic wall will be constructed from a durable material with sufficient mass to prevent direct noise transmission (such as 100mm aerated lightweight concrete panels) and will extend for approximately 180 metres. The wall will contain overlapping components to allow for vehicle access into the site and will have a top of wall height of RL57m (5 – 6 metres).

The proposed development does not propose to construct, nor seek any form of planning approval for the Park Edge Street for the following reasons.

- Constructing a road in isolation can lead to inefficiencies and underutilisation. Without the simultaneous development of adjacent sites and connecting infrastructure, the road may remain largely unused, failing to deliver the intended benefits of improved connectivity and accessibility. This misalignment can result in wasted resources.
- The financial burden on the developer is considerable. Building a road without the guarantee of immediate utility places an undue financial strain on the developer, potentially impacting the viability of their project. These funds could be better allocated towards other critical aspects of the development, such as high-quality public spaces, sustainable building practices, or community amenities that provide immediate value to workers.
- Requiring a developer to provide a road shown indicatively in the Western Sydney Aerotropolis Precinct Plan, given the asynchronous development of adjacent sites and the absence of connecting roads, is not a prudent or reasonable course of action in the present circumstance.

3.2.7 Building Materials and Finishes

A contemporary material palette is proposed for the buildings as illustrated in the figure below. The materials have been selected to articulate the building facades and provide visual interest within the site. The proposed materials include:

- Orange ('Vitra Fanta'), red ('Vitra Red Horizon') and blue ('Mosman Blue') metal cladding will be applied to the office buildings. A different colour is proposed for each office building to distinguish the various tenancies within the site. The proposed colours have been selected in consultation with traditional custodians and comprise earthy tones that reflect the nearby South Creek and Australia's red soil.
- Alternating vertical bands of 'Deep Ocean', 'Shale Grey' and 'Surfmist' metal cladding will be applied to the facades of both warehouses. The three alternating colours will provide contrast and visual interest within the site. Both warehouses will have a consistent appearance and present as 'related' buildings.
- Full height glazing at ground floor level of the office buildings to improve the amenity of these spaces. Metal and translucent sheet roofing will be provided to both warehouses. The translucent sheeting will assist natural solar gain to the warehouses and reduce energy requirements.
- Powder coated aluminium frames are proposed to the door entries and windows

Figure 18 Proposed Imagery



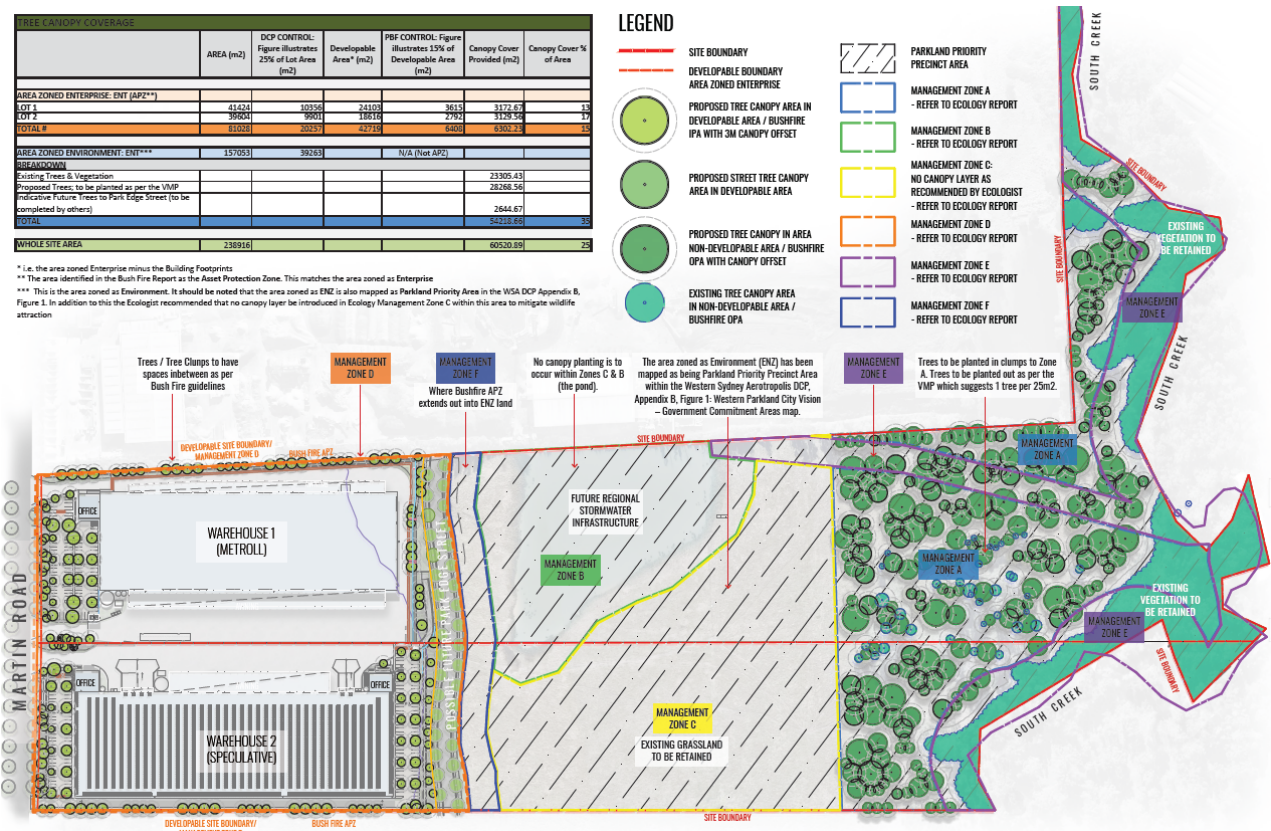
Source: EMKC3 (2025)

3.2.8 Landscaping

The proposed landscaping has been informed by the Connecting with Country Overlay Framework prepared by Ngurra Advisory and responds to the ecological characteristics and proposed function of four vegetation 'management zones' identified within the site (refer to **Figures 19–22** below):

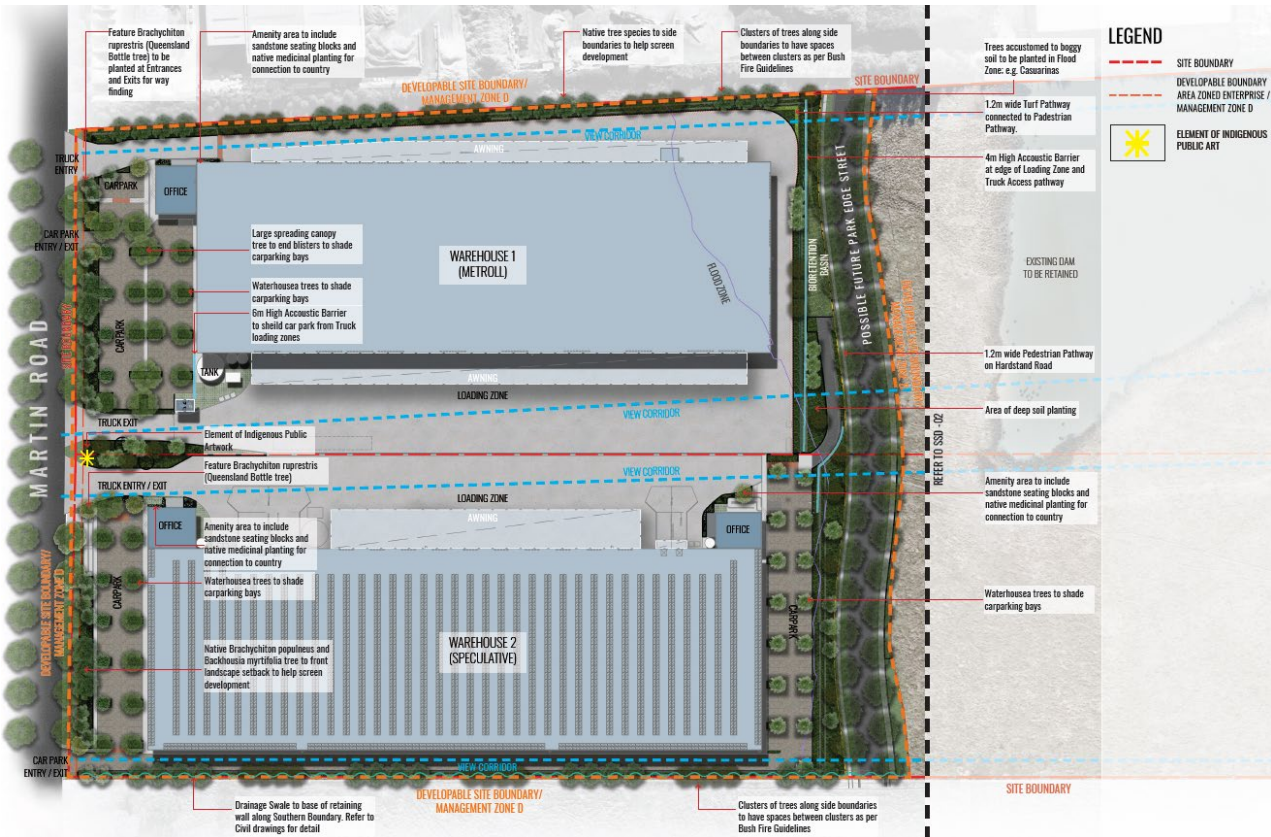
- **Management Zone A** comprises the eastern part of the site, excluding the land that immediately bounds South Creek. Existing grassland and vegetation in this zone will be retained. Scattered groups of trees are proposed to be planted within the zone.
- **Management Zone B** comprises the area around the existing farm dam. This part of the site has been identified in the WSA Precinct Plan as the location of future regional stormwater infrastructure. Accordingly, it will be retained in its existing state and no landscaping is proposed in the zone.
- **Management Zone C** is located to the west of Management Zone A. It excludes the existing farm dam and area identified for future regional stormwater in the WSA Precinct Plan. Existing grassland is to be retained within Zone C. Understorey planting is also proposed within this zone.
- **Management Zone D** comprises the land zoned ENT and in which the two warehouses, operational hardstand, and car parking is proposed. The proposed landscaping approach for Management Zone D includes:
 - Feature tree planting is proposed at the site entrance and exit driveways located along Martin Road to assist wayfinding
 - As shown in **Figures 18 and 19**, significant tree planting is proposed along the Martin Road frontage to provide screening to the proposed buildings.
 - Additional tree planting is proposed along the northern and southern boundaries of the zone. Native species are proposed, and trees will be planted in clusters (with spaces between) in accordance with Planning for Bushfire requirements.
 - Regular tree planting is proposed within the three car parks (located to the west and east of the warehouses) to provide shading.
 - A central landscaped median strip is proposed at the front of the site between Lot 1 and Lot 2. The strip will include indigenous public artwork as well as tree planting and other landscaping.
 - High quality amenity areas are proposed adjacent to each of the office buildings, and will incorporate medicinal planting as well as sandstone seating
 - A bioretention basin is proposed to the east of Warehouse 1. Trees adjacent to the bioretention basin will be accustomed to boggy soils conditions.
- **Management Zone E** comprises the area of the future Park Edge Street. Sensitive weed management will be undertaken in this zone.
- **Management Zone F** comprises the land along the eastern boundary of the site that is located within 40 metres of South Creek. It also includes land within 10 metres of the unnamed first order tributary that crosses the eastern part of the site. No planting is proposed in this zone.

Figure 19 Proposed landscaping management zones



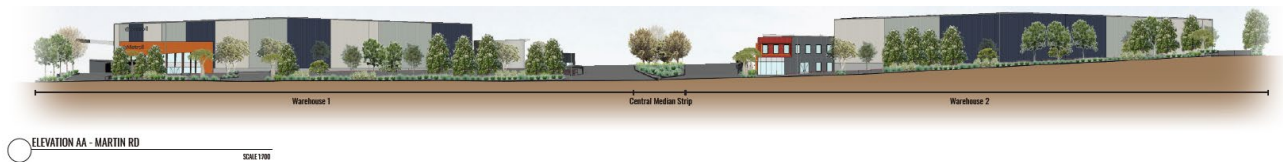
Source: Geoscapes, 2026

Figure 20 Landscape Masterplan



Source: Geoscapes, 2026

Figure 21 Landscaping along the Martin Road frontage



Source: Geoscapes, 2026

Figure 22 Martin Road frontage landscaping typical details



Source: Geoscapes, 2026

The proposed canopy coverage, site permeability and deep soil provision has been calculated by Geoscapes (refer **Appendix Y**) are set out in **Table 11** below. The amount of canopy coverage that can be provided is constrained by the site's bushfire protection and aviation safeguarding requirements. Notwithstanding, significant planting and deep soil provision is proposed on the site as detailed below.

Table 11 Canopy coverage, site permeability and deep soil provision

Parameter	DCP Control	Planning for Bushfire Control	ENT zone	ENZ zone	Whole Site
Pervious Area (% of site area)	15%	N/A	15% (N.B excludes Park Edge Street)	100%	69%
Deep Soil (% of site area)	15%	N/A	10%	100%	69%

Parameter	DCP Control	Planning for Bushfire Control	ENT zone (N.B excludes Park Edge Street)	ENZ zone	Whole Site
Canopy Cover (% of site area)	25%	Max. 15% of developable area	15% (N.B. excludes Park Edge Street)	35%	25%

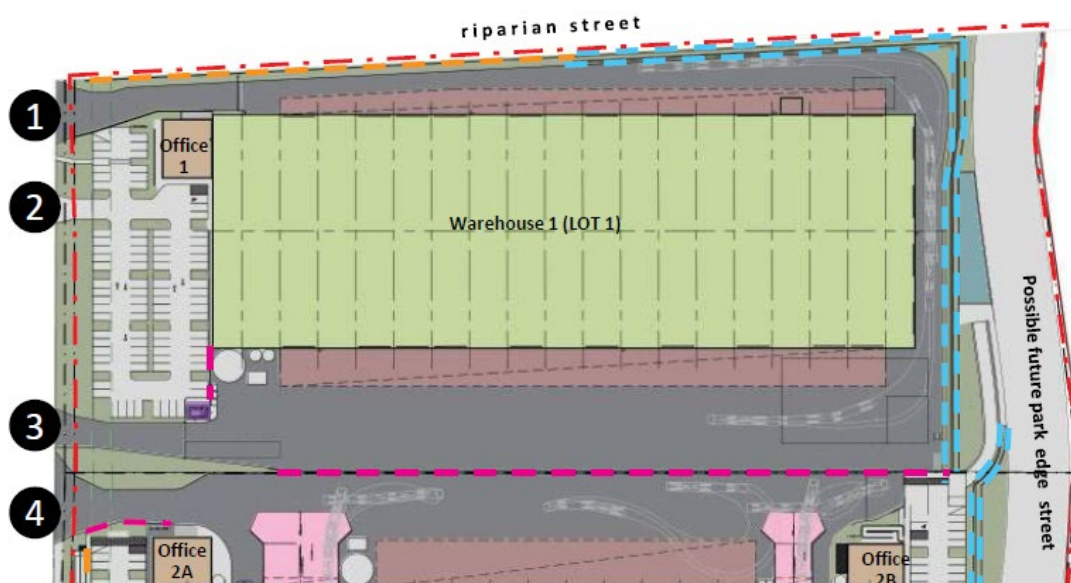
It is envisaged that significant tree planting will also be provided along the future Park Edge Street and Martin Road in accordance with the relevant cross section and landscaping zones within the Aerotropolis DCP. This may assist in increasing the canopy coverage across the site.

Boundary Treatment

In addition to tree planting, several boundary treatments are proposed including:

- A combination of permanent and temporary turfing along the Martin Road frontage. Temporary turfing will be provided to the area designated for the future widening of Martin Road until the road upgrades to a Collector Road are undertaken by Council in the future.
- Palisade fencing along the edge of the bioretention basin and between the two warehouse lots. Palisade fencing will also be installed to separate the truck access routes within the site from the car parking and external amenity spaces.
- Terraced retaining walls located along the southern and northern boundaries of the site. Larger trees will be provided at the base of the retaining walls with shrubs and other plants on the middle and upper levels. This is due to the internal straps required to maintain the structural integrity of the tiered retaining walls.
- A Riparian Street will be delivered to the north of the site (adjacent to the site's northern boundary as illustrated in the Figure below) in the future by others in accordance with the WSA Precinct Plan. The proposed setback to the northern boundary complies with the relevant requirements within the WSA DCP and does not preclude the future delivery of this street and any required vegetated riparian zones. Planting located along the northern boundary of the site will integrate with, and provide an appropriate transition to, the Riparian Street and soften the appearance of the retaining walls.

Figure 23 Riparian Street located to north of Warehouse 1

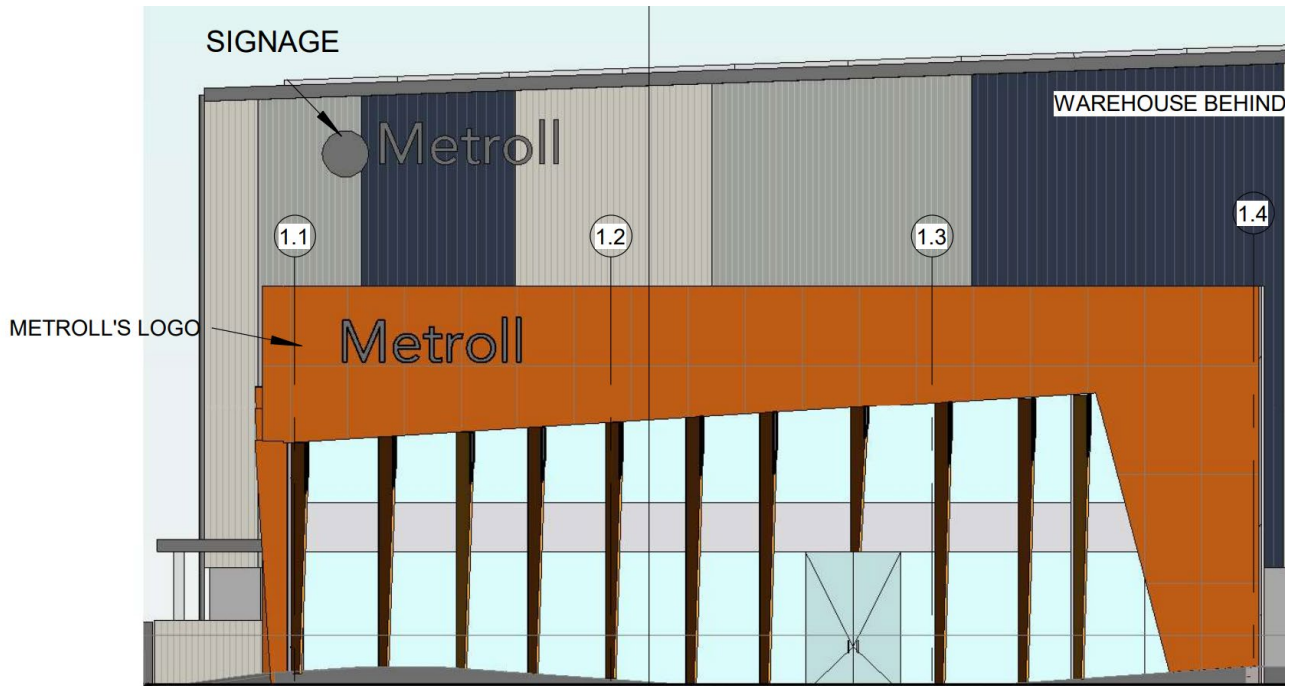


Source: EMKC3, 2026

3.2.9 Signage

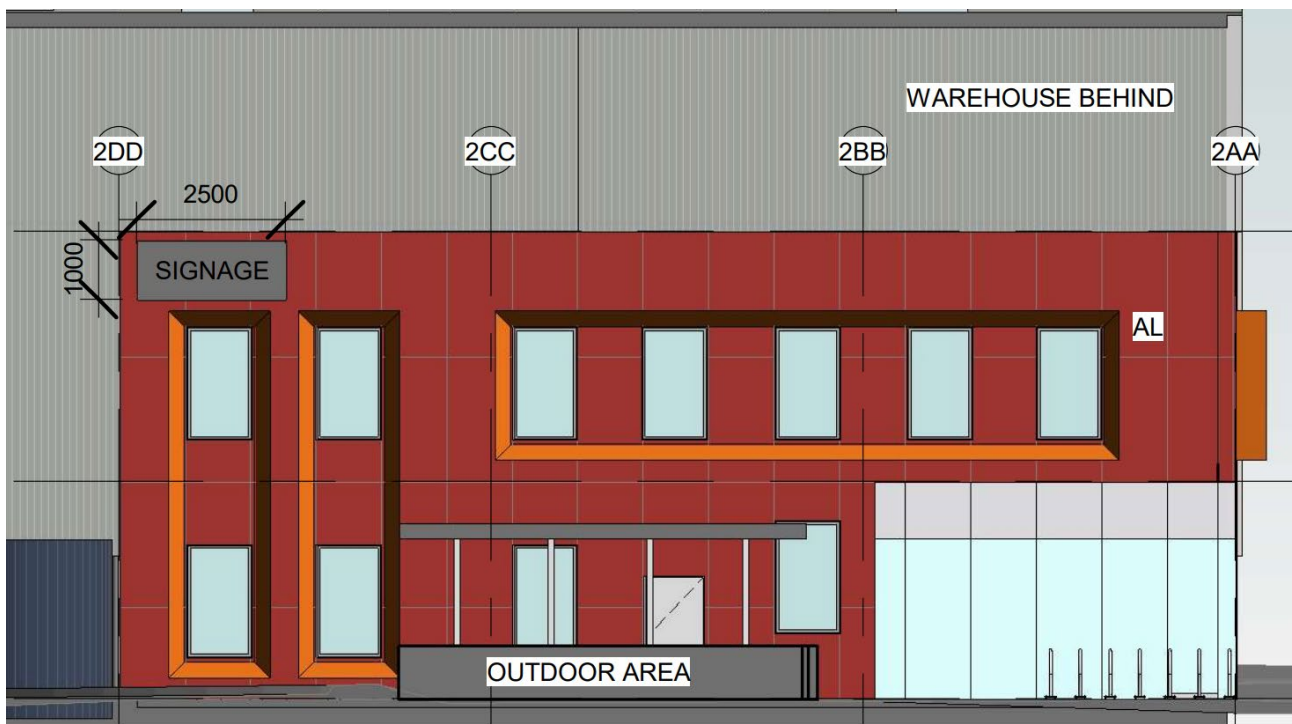
Tenant wall signage (Business Identification signage) will be located on the western façade of Warehouse 1 and the western façade of its associated office building as shown below. Additionally, an indicative signage zone is proposed on the two office buildings proposed in lot 2. It is anticipated that further signage will be installed across the site to support wayfinding and future tenant's requirements. The detailed signage for Lot 2 will be subject to a future application once the operator becomes known.

Figure 24 Proposed Metroll Signage



Source: EMKC3, 2026

Figure 25 Office 2A Proposed Signage Area



Source: EMKC3, 2026

Figure 26 Office 2B Proposed Signage Area



Source: EMKC3, 2026

3.2.10 Stormwater Management

Two (2) on-site detention (OSD) tanks will be installed within the site to attenuate peak flows. The OSD tanks will comprise a larger tank located between Warehouse 1 and Warehouse 2, and a smaller tank located to the north of Warehouse 1. A water treatment train comprising rainwater tanks, gross pollutant tanks, ocean protect stormfilter cartridges (located within the OSD tank) and a bioretention basin will be installed as detailed in **Sections 3.2** and **6** of this EIS.

The Precinct Plan includes regional stormwater infrastructure located on the ENZ part of the site. Once operational, the regional stormwater infrastructure will receive flows from the development's bioretention basin (subject to approval). The design and delivery of the regional stormwater infrastructure is subject to future delivery by Sydney Water. In the interim period, flows from the bioretention basin will discharge to the existing dam in the ENZ area and are capable of connecting to the regional system once delivered in the future.

3.2.11 Parking and Loading

3.2.11.1 Car Parking

Car parking is provided for each lot. Car parking in Lot 1 will be provided to the west of Warehouse 1 and will be directly accessible from Martin Road. The car park will be located close to the office entrance and include a total of 87 spaces. The car park will include one accessible space and electric vehicle charging equipment for three (3) spaces.

Two (2) car parks will be provided within Lot 2 to the west and east of the warehouse. The car parks will be connected via an internal access road (for use by light vehicles only) that will be located along the site's southern boundary. A total of 123 car parking spaces, including two accessible spaces and eight (8) spaces with electric vehicle charging equipment will be provided within Lot 2.

The car parking provision is fully consistent with the minimum rates within the WSA DCP 2022, as detailed in **Table 12**.

Tree planting is proposed throughout the car parks to enhance the amenity of these spaces and increase the site's canopy coverage. Large spreading canopy trees, *Waterhousea* trees and *Clerodendrum tomentosum* trees will be planted within the car parks to provide shading. In addition, permeable paving is proposed within the car parking areas and around the water tanks to assist drainage.

Table 12 Car Parking Requirements and Compliance

Type	DCP Requirement	Parking Proposed
Car Parking	Lot 1: Min. 57 – Max. 171	Lot 1: 87
	Lot 2: Min. 66 – Max. 197	Lot 2: 123
Bicycle Parking	Lot 1: 18	Lot 1: 18
	Lot 2: 20	Lot 2: 36
Car Share	Min. 1 space per 40 car spaces provided.	Lot 1: 3
		Lot 2: 4
Electric Vehicle	1 space per 40 car spaces provided.	Lot 1: 3
		Lot 2: 8

3.2.11.2 Cycle Parking

Bicycle parking will be provided externally within each lot close to the office building entrances. A total of 18 bicycle spaces are proposed in Lot 1. 36 bicycle spaces will be provided in Lot 2. The proposed provision exceeds the minimum requirements set out in the WSA DCP.

3.2.11.3 Loading facilities

Loading docks will be provided at grade to each Warehouse.

A total of twenty loading docks are proposed for Warehouse 1. The loading docks will be distributed along the northern and southern facades of the building in accordance with Metroll's operational requirements.

A total of 18 loading docks are proposed for Warehouse 2. The loading docks will be located along the northern façade of the building.

3.2.12 Waste Management

A waste storage area in Lot 1 is proposed to the south of the Warehouse near to the site exit. In Lot 2, waste storage areas are proposed within the northern hardstand area at either end of the warehouse. The bins will be located close to the recessed loading docks and office buildings.

In Warehouse 1, it is anticipated that commingled recycling and cardboard waste will be collected twice a week. Garbage will be collected three times per week.

In Warehouse 2, waste collection will occur twice per week (**Note:** this may vary upon securing a tenant, for which any deviation would be assessed under separate development consent).

Further details of the proposed waste management strategy for the site are set out in **Appendix II**.

3.2.13 Infrastructure Staging

The following table summarises the relevant for consideration. It details the responsibilities and funding of infrastructure required to service the site.

Table 13 Infrastructure Staging

Infrastructure	Funding	Delivery by proponent	Delivery Year
Potable Water	Sydney Water with developers paying DSP charges	No	TBC – in line with adjacent roads
Wastewater	Sydney Water with developers paying DSP charges	No	2026-2028
Recycled Water	Sydney Water with developers paying DSP charges	No	2026/2027
Electrical	TBC	TBC	2026
Telecommunications	TBC	TBC	TBC
Gas	TBC	TBC	TBC

3.2.14 Development Timing

It is anticipated that the development will be constructed in accordance with the indicative timeframes set out in **Table 14** below.

Table 14 Indicative construction timing

Phase	Indicative timeframe
Site preparation works	Q1 2027
Bulk earthworks and excavation	Q1 2027
Installation of in-ground services and supporting infrastructure	Q1 2027
Warehouse 1	
Construction and fit-out of Warehouse 1	2027
Landscaping and final works for Lot 1	2027
Warehouse 2	
Construction and fit-out of Warehouse 2	2027
Landscaping and final works for Lot 2	2027

4 Statutory Context

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

- *Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999 (EPBC Act)*
- *Biodiversity Conservation Act 2016 (BC Act)*
- *Water Management Act 2000 (WM Act)*
- *Protection of the Environment Operations Act 1997 (PoEO Act)*
- *Environmental Planning and Assessment Act 1979 (EP&A Act)*
- *Environmental Planning Assessment Regulation 2021 (EP&A Regulation)*
- *State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (Precincts SEPP)*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021 (BC SEPP)*
- *State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H 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 (Planning Systems) 2021 (Planning Systems SEPP)*
- *Western Sydney Aerotropolis Precinct Plan (Precinct Plan) 2022*
- *Draft State Environmental Planning Policy (Climate Change and Natural Hazards) 2026 (CC&NH SEPP)*
- *Western Sydney Aerotropolis Development Control Plan 2022*
- *Recognise Country Guidelines for Development in 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

Table 15 categorises and summarises the relevant requirements in accordance with the DPHI *State Significant Development Guidelines*. A detailed statutory compliance table for the project is provided at **Appendix C**.

Table 15 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
Power to grant approval	Schedule 1, Section 29 of the Planning Systems SEPP states that development in the Western Sydney Aerotropolis is state significant development if it: Has an estimated development cost of more than \$30 million, and Does not involve development – (i) Prohibited under the Chapter, or (ii) To which that Policy, section 4.13A applies.

Statutory Relevance	Action
	The site is located within the Western Sydney Aerotropolis and the proposed development has an estimated development cost of \$108,866,194. The proposed buildings, car parking and site access will be located entirely within the part of the site zoned ENT, with only minor landscaping (tree planting) proposed in the ENZ zoned land. The land use table included within part 4.2 of State Environmental Planning Policy (Precincts – Western Parkland City) 2021 shows that Warehouse and distribution centres and manufacturing (general industry) are permitted with consent (i.e. not prohibited) within the ENT zone. Section 4.13A of the Precincts SEPP is not relevant as the proposed uses are permitted with consent in the Enterprise Zone. Accordingly, the proposal is classified as SSD under the Planning Systems SEPP Schedule 1 Section 29.
Permissibility	The site is zoned ENT and ENZ under the Precincts SEPP. As noted above the proposed development, which is defined as a Warehouse and Distribution Centre, is permissible with consent in the ENT zone. All works proposed in the ENZ, including landscaping and tree planting are permissible.
Section 4.41 of the EP&A Act – Approvals that do not apply	
<i>Fisheries Management Act 1994</i>	Permits under sections 201, 205 or 219 are not required.
<i>Heritage Act 1977</i>	Approval under Part 4 or excavation permit under section 139 is not required.
<i>National Parks and Wildlife Act 1974</i>	An Aboriginal heritage impact permit under section 90 is not required
<i>Rural Fires Act 1997</i>	A Bush Fire Safety Authority under section 100B is not required, noting the proposal is limited to remediation, quarrying and bulk earthworks with no habitable buildings proposed.
<i>Water Management Act 2000</i>	A water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000 is not required. This means that controlled activity approval on waterfront land is not required for the project.
Section 4.42 of the EP&A Act – Approvals that must be applied consistently	
PoEO Act	Lot 1 will be occupied by Metroll, a manufacturer and supplier of steel building products. The proposed building will be used primarily as a warehouse for storage and distribution however will contain a minor ancillary manufacturing component related to the cutting of steel. It is anticipated that the manufacturing component will involve the processing of more than 10,000 tonnes per year of steel, which exceeds the limit set out in Schedule 1 Part 1 (26) of the PoEO Act. Accordingly, a licence for premises-based activities will be required.

4.2 Pre-Conditions

Table 16 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 16 Pre-Conditions

Statutory Reference	Pre-Condition	Comment	Section
Environmental Planning and Assessment Regulation 2021			
S66(1)(c) (2)(b)	A development application for development on the following land must not be determined by the consent authority unless a contributions plan has been approved for the land shown on the Land Application Map under Precincts SEPP, Chapter 4. The consent authority may dispense with the requirement for a contributions plan if the developer has entered into a planning agreement for the matters that may be the subject of a contributions plan.	Liverpool City Council adopted an Aerotropolis7.12 Contributions Plan in July 2024. This plan prescribes a contribution rate of 4.6% of the estimated development cost (EDC) of the proposal for proposals with an EDC of over \$200,000.	Section 6.2
Western Parkland City SEPP 2021			
Section 4.17(2)	Development consent must not be granted to noise sensitive development if the development is to be located on land that is in an ANEF or ANEC contour of 20 or greater.	The proposed development is not a 'noise sensitive development'.	Section 6.1.5
Section 4.19 (2)	Development consent for relevant projects within the 0-3km wildlife buffer zone can only be granted if the consent authority has consulted the relevant Commonwealth body and considered a detailed assessment provided by the applicant. This assessment should include information about the wildlife likely to be present on the land, any threats to species, and how the development will mitigate risks to airport operations, including measures related to waste management, landscaping, wildlife dispersal, and other relevant matters.	The site is located within the 0 – 3km zone. However, the proposal does not comprise 'relevant' or prohibited development'. The Applicant is undertaking ongoing and regular discussions with Sydney Water regarding the delivery of regional stormwater infrastructure in the eastern part of the site. The proposed development includes an interim solution comprising a stormwater bioretention basin. A Biodiversity Assessment Report (Appendix M) and Wildlife Hazard Assessment and Wildlife Management Plan (Appendix GG) have been prepared for the site to assess the wildlife present on the site and risks it may cause to airport operations. The Wildlife Hazard Assessment Report considers that as the proposed stormwater bioretention basin will have	Section 6.1.10

Statutory Reference	Pre-Condition	Comment	Section
		limited standing water and no submerged vegetation and will be in close proximity to the warehouses (i.e. high disturbance area), it is unlikely to attract flocks of large birds and exacerbate risks when compared to baseline scenario.	
Section 4.22	This section applies to development on land depicted on the Obstacle Limitation Surface Map, which is considered a controlled activity under Part 12, Division 4 of the Airports Act 1996 of the Commonwealth, including construction or alteration of buildings that penetrate the prescribed airspace. Development consent for such activities can only be granted if the consent authority has consulted the relevant Commonwealth body.	The proposal does not penetrate the OLS for the site	Section 6.1.17
Section 4.24 (3)	(a) Development consent can only be granted to development on land to which this section applies if the development is compatible with the land's flood hazard, considering climate change projections, and it incorporates measures to manage flood risk, ensure safe occupation and evacuation, and prevent significant adverse environmental effects or unsustainable social and economic costs due to flooding. Additionally, the development must be consistent with any relevant floodplain risk management plan adopted by the council in accordance with the Floodplain Development manual.	The eastern part of the site is located within the 1 in 100 ARI Flood Extent. A small part of the proposed building footprints as well as a car park and landscaping will be located within this area. Finished floor levels will be designed to be above the 1 in 100 flood extent. A Flood Impact Risk Assessment (FIRA) has been prepared to inform the proposed development and is included at Appendix U. The assessment addresses the matters set out in section 4.23 (4), including the requirement for any mitigation.	Section 6.1.7 and Appendix U
Section 4.25 (3) and (4)	(a) Clearing of native vegetation on land to which this section applies is prohibited without development consent. Consent can only be granted if the authority is satisfied that there's no reasonable alternative to the disturbance, the impact on biodiversity is minimised, the clearing won't increase salinity, disturbed vegetation will be reinstated where possible, loss of vegetation will be compensated by revegetation, and the clearing won't cause or	The eastern part of the site is zoned ENZ. Part of the site (near to its eastern boundary and the interface with Wianamatta Creek) is identified as 'existing native vegetation' on the High Biodiversity Value Areas Map. Additionally, a small part of the site is identified within the Precinct Plan as 'ENZ to be retained'. The Growth Centres Biodiversity Certification includes portions of the site that are listed as 'certified'. Most of the ENT zoned land is Biodiversity Certified (2021). However, the eastern	Section 6.1.4 and 6.1.10

Statutory Reference	Pre-Condition	Comment	Section
	increase adverse land or water impacts.	part of the ENT zone as well as the ENZ zoned land is not biodiversity certified. The BDAR considers this in further detail (refer to Appendix M). Only minor landscaping / tree planting is proposed within the land zoned ENZ. No development is proposed in the area identified as existing native vegetation.	
Section 4.25A (2)	Development consent 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.	Part of the site (near to its eastern boundary and the interface with Wianamatta Creek) is identified as 'existing native vegetation' on the High Biodiversity Value Areas Map. However, no development is proposed in the area identified as existing native vegetation.	Section 6.1.4 and 6.1.10
Section 4.28B	Development consent must not be granted to development on land to which this Policy applies unless the consent authority has considered Recognise Country: Guidelines for development in the Aerotropolis published in November 2022 on the Department's website.	The project is underpinned by a detailed Connecting with Country strategy. As set out within sections 6.1.2 of this EIS, the Connection to Country report (cultural overlay framework) (Appendix HH), the proposal has been designed with regard to the relevant guidelines and policy frameworks.	Section 6.1.2 and Appendix HH
Section 4.31 (2)	Development consent cannot be granted unless the development is reviewed by a design review panel and the consent authority considers the panel's findings. Additionally, the consent authority must be of the opinion that the development exhibits design excellence.	All SSDs in the Aerotropolis are required to be reviewed by the State Design Review Panel (SDRP). Meetings with the SDRP were held on 22/02/2024 and 02/05/2024 respectively to discuss the project design. The response to the recommendations of the SDRP and the design excellence provisions within the Precincts SEPP are addressed in the EIS and in the accompanying Architectural Design Report.	Appendix J and section 6.1.2
Section 4.39 (1)	Development consent must not be granted to development on land to which a precinct plan applies unless the consent authority is satisfied that the development is consistent with the precinct plan	The Western Sydney Aerotropolis Precinct Plan applies to the site. A variation to the Precinct Plan is proposed under 4.39 of the SEPP. The variation is described in a separate written request at Appendix PP.	Section 2.21
Section 4.49 (1)	Development consent cannot be granted for development to which this Division applies unless the consent authority is satisfied that essential public utility infrastructure is either	This provision is relevant to the development as it is on land in the Western Sydney Aerotropolis and is for industrial purposes.	Appendix P and section 6.2.8

Statutory Reference	Pre-Condition	Comment	Section
	currently available or will be available when required for the development. This ensures that the necessary infrastructure is in place to support the proposed development.	Engagement has been undertaken with several agencies regarding the delivery of infrastructure within the Aerotropolis and to inform the proposed interim and final services infrastructure strategy for the site as detailed in Appendix P and section 6.2.8 of this EIS.	
Transport and Infrastructure SEPP 2021			
Section 2.122 (4)	Before determining a development application for relevant development, the consent authority must notify TfNSW in writing within 7 days of the application and consider any submission provided by TfNSW within 21 days. The authority must also consider the site's accessibility, including the efficiency of people and freight movement, the potential to minimise car travel and maximise rail freight, and any potential traffic safety, road congestion or parking implications.	The proposed development comprises a warehouse and distribution centre and will have a gross floor area of greater than 8,000m². Accordingly, section 2.122 of the Transport and Infrastructure SEPP is applicable. Consultation has been undertaken with TfNSW regarding the traffic impacts arising from the proposed development, the required mitigation and to inform the interim and final access arrangements to the site. The Applicant is committed to ongoing engagement with TfNSW throughout the assessment process.	Section 6.1.9
Biodiversity and Conservation SEPP 2021			
Section 2.6 (1)	A person must not clear vegetation in a non-rural area of the State to which Part 2.3 applies without the authority conferred by a permit granted by the council under that Part	The site is located within a non-rural part of the State to which part 2.3 applies. An arborist report has been prepared to support the SSDA (refer to Appendix KK) and identifies the vegetation to be removed, protected and retained. Note, there are no trees identified in the Arborist Report subject to removal.	Section 6.1.10
Section 2.6 (2)	A person must not clear native vegetation in a non-rural area of the State that exceeds the biodiversity offsets scheme threshold without the authority conferred by an approval granted by the Native Vegetation Panel under Part 2.4	The site is located within a non-rural part of the site but is largely cleared of vegetation. The Growth Centres Biodiversity Certification includes portions of the site that are listed as 'certified' (ENZ Zone) and 'not certified' (ENT Zone). The biodiversity certification relates to most of the ENT zoned land. However, the eastern part of the ENT zoned land and the ENZ zoned land are not certified. Accordingly, a BDAR has been prepared to accompany the SSDA.	Section 6.1.10
Section 4.9 (2)	Before a council may grant consent to a development application for	A BDAR report (Appendix M) has been prepared to consider the impacts of	Section 6.1.10

Statutory Reference	Pre-Condition	Comment	Section
	consent to carry out development on the land, the council must assess whether the development is likely to have any impact on koalas or koala habitat.	the proposed development on fauna and flora. The BDAR notes that the site is not 'core koala habitat' as it not considered as highly suitable habitat. Koalas have not been recorded within the previous 18 years and there are no koala records in the locality or any feed trees present within the site. Please refer to section 6 .	
Section 4.9 (4)	If the council is satisfied that the development is likely to have a higher level of impact on koalas or koala habitat, the council must, in deciding whether to grant consent to the development application, take into account a koala assessment report for the development.	A BDAR report (Appendix M) has been prepared to consider the impacts of the proposed development on fauna and flora. The BDAR notes that the site is not 'core koala habitat' as it not considered as highly suitable habitat. Koalas have not been recorded within the previous 18 years and there are no koala records in the locality or any feed trees present within the site.	Appendix M
Section 6.6 (2)	Development consent must not be granted to development on land in a regulated catchment unless the consent authority is satisfied the development ensures – 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	The site is located within the Hawkesbury Nepean Catchment. An civil infrastructure report has been prepared (refer to Appendix P and section 6 of this report) and sets out the measures proposed to ensure the quality of water entering a natural waterbody will be as close as possible to neutral or beneficial and minimise impact on water flow in a natural waterbody.	Section 6 and Appendix P
Section 6.7 (2)	Development consent cannot be granted for land in a regulated catchment unless the consent authority is satisfied that the development will minimise adverse impacts on terrestrial, aquatic or migratory animals or vegetation, will not adversely impact aquatic reserves, and has obtained necessary approvals or permits for clearing riparian vegetation. Additionally, the development must minimise erosion of land abutting a natural waterbody, sedimentation of the waterbody, and adverse impacts on non-coastal wetlands and littoral rainforests.	The site is located within the Hawkesbury Nepean Catchment. A Civil Infrastructure Report (including details of the integrated water management approach proposed and erosion and sediment control measures to be implemented) has been prepared and is enclosed in Appendix P . The report includes details of the mitigation measures proposed to minimise impacts on biodiversity, aquatic reserves and natural waterbodies including South Creek.	Section 6.1.13 and Appendix P
Section 6.8 (2)	Development consent cannot be granted for development on flood liable land in a regulated catchment unless the consent authority is	The site is located within the Hawkesbury Nepean Catchment. Most of the proposed development will be located outside of any flood liable land.	Section 6.1.7 and Appendix P

Statutory Reference	Pre-Condition	Comment	Section
	satisfied that, in the event of a flood, the development will not result in a release of pollutants that may adversely impact the water quality of a natural waterbody. Additionally, the development must not have an adverse impact on the natural recession of floodwaters into wetlands and other riverine ecosystems.	Notwithstanding this, a Civil Infrastructure Report has been prepared (refer to Appendix P). The report sets out the proposed measures to prevent the release of pollutants that may have an adverse impact on the water quality of any natural waterbody or the natural recession of floodwaters into any wetlands or riverine ecosystems.	
Section 6.9 (2)	Development consent cannot be granted for 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 adversely impacting natural waterbodies, watercourses, wetlands or riparian vegetation. Additionally, new or existing points of public access between natural waterbodies and the development site must be stable and safe, and if land forming part of the foreshore of a natural waterbody will be made available for public access as a result of the development but is not in public ownership, public access to and use of the land must be safeguarded.	The site is located within the Hawkesbury Nepean Catchment. Public access will not be available through the site to South Creek in the short-term. However, the Applicant is exploring opportunities to enable access through the site (to the ENZ zoned land and South Creek) to be provided for First Nations groups once the development is operational.	NA
Section 6.10	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.	The site is located within the Hawkesbury Nepean Catchment. Accordingly, it is expected that the council of each adjacent or downstream local government area will be consulted as part of the public exhibition of the SSDA.	NA
Resilience and Hazards SEPP 2021			
Section 3.11	A person who proposes to make a development application to carry out development for the purposes of a potentially hazardous industry must prepare (or cause to be prepared) a preliminary hazard analysis in accordance with the current circulars or guidelines published by the Department of Planning and submit the analysis with the development application.	The proposed activity does not propose any development that is required to be considered under Chapter 3 – Hazardous and Offensive Development including dangerous goods. Notwithstanding, a preliminary risk screening has been prepared for the proposal (in particular for Warehouse 1) noting minor quantities of dangerous goods proposed to be stored in the southeast portion of proposed Lot 1. Separate development consent would	Appendix AA

Statutory Reference	Pre-Condition	Comment	Section
		be sought should a tenant be secured for Warehouse 2 and any Dangerous Goods are proposed.	
Section 4.6 (1)	(a) A consent authority cannot approve any development on land without first considering whether the land is contaminated. If the land is contaminated, the authority must be satisfied that the land is suitable in its contaminated state (or will be suitable after remediation) for the proposed development, and if remediation is required, the authority must be satisfied that the land will be remediated before it is used for the proposed purpose.	A Detailed Site Investigation has been prepared (refer to Appendix R). The DSI confirms that the site is suitable for the proposed land use activities in accordance with Chapter 4 of the Resilience and Hazards SEPP.	Section 6.2 and Appendix R
Industry and Employment SEPP 2021			
Section 3.6	A consent authority cannot grant development consent for the display of signage unless it is satisfied that the signage aligns with the objectives of this Chapter as outlined in section 3.1(1)(a). Additionally, the signage must meet the assessment criteria specified in Schedule 5.	The proposed buildings include building identification and other signage. An assessment of the proposed signage against the criteria specified in Schedule 5 of the SEPP is included in Appendix C .	Appendix C
Sustainable Buildings SEPP 2022			
Section 3.2 (2)	Development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.	The proposed development comprises a non-residential use. An embodied emissions form has been completed and enclosed with this SSDA. A net zero statement and commitment to achieving NABER water and energy use standards are also included in Appendix MM and Appendix S (ESD Report)	Appendix MM
Section 3.3(2)	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. Energy use: The standard for energy use for development for the purposes of prescribed office premises is a 5.5 star NABERS energy rating.	As set out within the accompanying ESD Report (Appendix S) prepared by Aspire, the proposed office spaces will comply with the energy and water targets for large commercial development	Appendix S

Statutory Reference	Pre-Condition	Comment	Section
	Water use: The standard for water use for large commercial development is a 3 star NABERS water rating.		

4.3 Mandatory Considerations

Table 17 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 17 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulation		
Section 1.3	Objects of the EP&A Act are as follows: (a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources, (b) to promote the supply, delivery and maintenance of housing, including affordable housing, (c) to promote productivity through the development and management of the State and its resources, (d) to protect the environment, including the conservation of threatened species of native animals and plants and ecological communities and their habitats, (e) to promote resilience to climate change and natural disasters through adaptation, mitigation, preparedness and prevention, (f) to promote the sustainable management of built and cultural heritage, including Aboriginal cultural heritage, (g) to promote good design, amenity and the proper construction and maintenance of built environments, including the protection of the health and safety of the occupants of buildings, (h) to provide opportunities for participation in environmental planning and assessment, (i) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social	Appendix C

Statutory Reference	Mandatory Consideration	Section in EIS
	considerations in decision-making about environmental planning and assessment, (j) to promote a proportionate and risk-based approach to environmental planning and assessment, (k) to promote the orderly and economic use and development of land.	
Section 4.15(1)(a)(i)	Relevant environmental planning instruments Western Parkland City SEPP 2021	Section 6 and Appendix B
	Transport and Infrastructure SEPP 2021	Section 6.1.1 and Appendix B
	Biodiversity and Conservation SEPP 2021	Section 6.2.10 and Appendix B
	Resilience and Hazards SEPP 2021	Section 6.2.2, 6.2.6 and Appendix B
	Industry and Employment SEPP 2021	Appendix B
	Sustainable Buildings SEPP 2022	Section 6.2.13 and Appendix B
Section 4.15(1)(a)(ii)	A draft State Environmental Planning Policy – Climate Change and Natural Hazards was placed on public exhibition (February–March 2026). The draft SEPP proposes to consolidate and elevate existing flood, bushfire and climate change provisions within a single State instrument and introduce new consent authority considerations, including climate scenario assessment and urban heat. While not yet in force, the matters addressed by the draft SEPP are already considered through the existing planning framework and addressed in the EIS and relevant technical documentation	Appendix B
Section 4.15(iii)	Relevant Development Control Plan The relevant provisions of the Aerotropolis DCP have been considered throughout this report and appendices as relevant in accordance with the SEARs.	Appendix B
Section 4.15(iia)	Ongoing discussions will be undertaken with Council to consider the extent of any letter of offer to be provided to determine the extent of contributions that can be offset based on frontage upgrades. Contributions will be provided against the SIC in relation to the future regional cycle path.	Appendix B
Section 4.15(iv)	The regulations to the extent that the prescribe matters for the purposes of s4.15(iv) (EP&A	

Statutory Reference	Mandatory Consideration	Section in EIS
	Regulation Part 4, Division 1) has been considered in drafting this EIS.	
Section 4.15(b)	The significant likely impacts of the development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality have been considered in this EIS.	Section 6
Section 4.15 (c)	The suitability of the site for the development	Section 7
Section 4.15 (d)	Any submissions	Section 5
Section 4.15 (e)	The public interest	Section 5
Section 4.15 (1A)(b)	Factors that are not of relevance to development the subject of the application.	Appendix B
Section 4.24	Not applicable	NA
EP&A Regulation Cl.35(1)(e) (4) (e)	Consistency assessment with: ▪ The WSAP ▪ Any Precinct Plan that applies to the land	Appendix B and Appendix C
Western Parkland City SEPP 2021	▪ Objectives and land uses for Enterprise Zone and Environment and Recreation Zone ▪ Part 4.3 – Development controls – Airport safeguards ▪ Part 4.4 – Development controls – general ▪ Part 4.5 – Design excellence ▪ Part 4.7 – Precinct plans and master plans	Section 6.1.2, Section 6.1.17 and Appendix B
Resilience and Hazards SEPP section 3.12	In determining an application for development, the consent authority must consider current circulars or guidelines published by the Department of Planning relating to hazardous or offensive development, whether any public authority should be consulted about environmental and land use safety requirements, and, in the case of potentially hazardous industry, a preliminary hazard analysis. The authority must also consider any feasible alternatives to the development and the reasons for choosing the proposed development and location, as well as any likely future use of the surrounding land.	A preliminary risk screening report has been prepared in accordance with the current circular//guidelines and is enclosed in Appendix AA.
Resilience and Hazards SEPP 2021 Section 4.6 (2)	Before determining an application for consent to carry out development that would involve a change of use on any of the land specified in subsection (4), the consent authority must consider a report specifying the findings of a preliminary investigation of the land concerned carried out in	A Detailed Site Investigation Report is enclosed in Appendix R.

Statutory Reference	Mandatory Consideration	Section in EIS
	accordance with the contaminated land planning guidelines.	
Biodiversity and Conservation SEPP section 6.11	In deciding whether to grant development consent to development on land within 100m of a natural waterbody in a regulated catchment, the consent authority must consider whether the proposed land uses abutting the natural waterbody are water-dependent. Additionally, the authority must ensure that conflicts between land uses are minimised.	Appendix B. The site is located within the Hawkesbury Nepean Catchment and is within 100 metres of a natural waterbody. However, only minor landscaping works are proposed within 100 metres of a natural waterbody.
Biodiversity and Conservation SEPP section 6.13	In deciding whether to grant development consent in a Hawkesbury-Nepean conservation area sub-catchment, the consent authority must consider whether the development will minimise human interference with the sub-catchment, maintain and enhance the structure and floristics of native vegetation, and maintain or enhance the scenic quality of the locality. Additionally, the authority must consider whether development has previously been carried out on the site.	Part of the site is biodiversity certified. Notwithstanding, a BDAR has been prepared and is enclosed in Appendix M. A landscape and visual impact assessment has been prepared and is enclosed in Appendix Y. The assessment considers the proposed development's impact on the scenic quality of the locality.
Western Sydney Aerotropolis Precinct Plan 2025	The SSDA has considered the relevant place-based objectives and requirements set out in: ▪ Introduction ▪ Precinct vision and objectives – Badgerys Creek ▪ Infrastructure and Development Staging ▪ Urban Structure ▪ Land Use and Built Form	Appendix B
Considerations under other legislation		
Biodiversity Conservation Act 2016 (BC Act) – section 7.14	The likely impact of the proposed development on biodiversity values. The Minister for Planning may (but is not required to) further consider under that BC Act the likely impact of the proposed development on biodiversity values. The western part of the site is Biodiversity Certified Land under the Growth Centres Biodiversity Certification Order. The eastern part of the site is not certified. Part 7.6 of the BC Acts states that Part 7 Biodiversity assessment and approvals under the Planning Act does not apply to development or activities on biodiversity certified land under Part 8. Land in the Badgerys Creek Precinct is subject to precinct planning requirements of the Order to confer biodiversity certification on the State	Section 6.1.10 and Appendix B

Statutory Reference	Mandatory Consideration	Section in EIS
	Environmental Planning Policy (Sydney Region Growth Centre) 2006. The Relevant Biodiversity Measures include a requirement to protect 2,000 hectares of Existing Native Vegetation in the Growth Centres. 67.31 hectares of ENV Validated land needs to be protected within land subject to the Precinct Plan. This includes a small part of the site (located towards the eastern boundary), which is identified as 'ENV to be retained'). It is noted that a small portion of ENT zoned land remains uncertified and as such a BDAR has been prepared for un-certified land.	
Water Management Act 2000 (WM Act) – Sections 89–91	It is important to note, that whilst the NSW Government's Hydroline Spatial Mapping identifies a Strahler 1 stream to the north of the site, physical evidence of this watercourse (i.e. defined bed and bank meeting the definition of a river) has not been identified as part of the investigations for the Proposal. As such, the proposal is not considered to be development on waterfront land in accordance with the definition prescribed under the WM Act. Notwithstanding this, it is noted that a controlled activity approval under s91 of the WM Act does not apply to SSD.	Appendix M
Development Control Plans		
WSADCP 2022	The SEARs for the project require consideration of the Aerotropolis DCP. As such the SSDA has considered the following sections of the DCP: ▪ Introduction and Administration ▪ General Controls ▪ Development for Enterprise and Industry, and Agribusiness	Appendix B

5 Community 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.

5.1 Engagement Carried out

Community and stakeholder engagement has been undertaken by the project team in the preparation of the SSDA. This included direct engagement and consultation with the agencies and consultees listed in the table below.

Table 18 Engagement with agencies and consultees

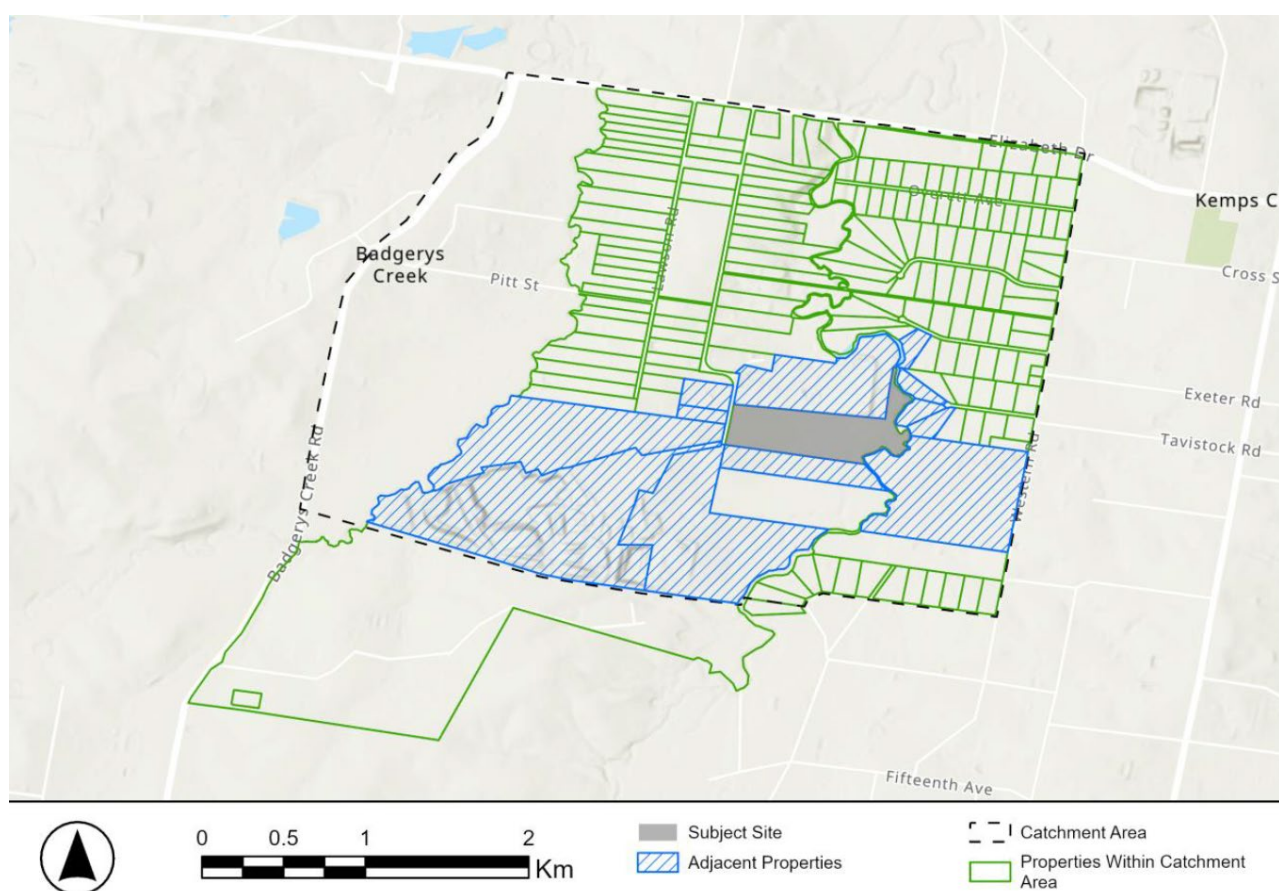
Agency / Consultee	Summary of engagement
DPHI	Consultation was undertaken with DPHI prior to the issue of SEARs. Further engagement was also undertaken with DPHI in May 2024.
Transport for New South Wales	The proposal was discussed with TfNSW on 7th June 2023. Discussions related to the development as well as future infrastructure provision within the WSA including the delivery of the Eastern Ring Road and its relationship to Martin Road. A second meeting was held with TfNSW on 22 February 2024. Further, the early consultation technical notes were issued to TfNSW and Council in late 2025 and further ongoing consultation will occur concurrently with TfNSW and Council to work through the future intent for the Eastern Ring Road and Martin Road which will inform whether a letter of offer is required to facilitate potential interim upgrades.
Sydney Water	The proposal was initially discussed with Sydney Water on 31st May 2023. A further meeting was held in March 2024 to discuss the proposed design and location of the Sydney Water stormwater infrastructure. Following the above, ongoing fortnightly meetings have been held with Sydney Water in April / May 2025 to discuss the design of the regional stormwater infrastructure in the ENZ land and how it will connect to the proposed development. Based on the discussions undertaken and the progression of the design, the proposed development has been design to include an interim solution, for which the regional basin will be delivered by Sydney Water in the future.
Liverpool City Council	The proposal was discussed with Council on 16th June 2023 and 10th May 2024. Council's feedback was limited and comprised of comments being focused on general compliance with the Precinct Plan. Notwithstanding the preliminary discussions, the applicant is committed to ongoing discussions with Council throughout the assessment process to understand the intent and direction concerning Martin Road upgrades and whether a resolution can be achieved to offsets against the contributions plan in relation to the proposal's provision to upgrade the frontage of Martin Road in the first instance.
NSW State Design Review Panel (SDRP)	The proposal was introduced to the SDRP on 22 nd February 2024. The proposal was subsequently refined and presented to the SDRP for a

Agency / Consultee	Summary of engagement
	second time on 2 nd May 2024. The comments of the SDRP have been addressed in the design where practicable and feasible.
Registered Aboriginal Parties (RAPs) including the Local Aboriginal Land Council (Gandangara)	A letter was sent to the Gandangara Local Aboriginal Land Council. The letter provided details of the proposed development, an invitation to an individual briefing session, and details of how to provide feedback on the proposal online. Consultation with aboriginal stakeholders was also undertaken to inform the Aboriginal Cultural Heritage Assessment Report (ACHAR). This included identifying stakeholders that hold cultural knowledge relating to the site. A total of 24 Registered Aboriginal Parties (RAPs) were identified. Copies of the draft ACHAR methodology and the draft ACHAR were subsequently issued to the RAPs for review and comment prior to their finalisation. Project updates were also issued to the RAPs on 25th September 2024 and 15th April 2025. Additionally, Darug Elders, Knowledge Holders and Community members have provided significant knowledge and wisdom throughout the preparation of the Connecting with Country Cultural Overlay Framework. This included identifying design priorities and key themes to inform the design of the development as well as community based initiatives.
Boral (landowners of adjacent site at 235 Martin Road)	The applicant met representatives of Boral on in February 2024. Boral are the proponents of SSDA SSD-60644466 for the adjoining site at 235 Martin Road. The discussion focussed on the compatibility / interface and timing of the proposed developments
Sydney Metro	The applicant contacted Sydney Metro on 16 th January 2025 to discuss the proposal. Sydney Metro confirmed that they did not have any comments and that a meeting was not warranted.
Jemena	The applicant contacted Jemena in January 2025 and has engaged in ongoing correspondence since to discuss the impacts of the proposed development on existing secondary gas main near the site. Jemena confirmed that no structures can be built above the main but driveways are acceptable subject to design review. Engineering approvals from Jemena for the construction of driveways above the Gas Main will be required prior to construction. The detail design of the driveways will be provided to Jemena prior to any construction works.
Goodman	The applicant has undertaken consultation with Goodman in relation to SSD-97688711 and SSD-97635233 to understand any implications of these proposal's on the subject proposal.
Formus	The applicant has undertaken consultation with Goodman in relation to SSD-81662708 to understand any implications of these proposal's on the subject proposal.

The following actions were taken to inform the community regarding the project and seek feedback regarding the proposal:

- Engagement with community stakeholders (comprising of local residents, landowners and businesses) was led by Astrolabe Group. A desktop review was undertaken by Astrolabe Group to identify any local or regional environmental and community groups. No relevant groups were identified
- Astrolabe Group defined an engagement catchment area for consultation with the community based on surrounding land uses, infrastructure and natural barriers. The engagement catchment area is shown in **Figure 27** below. Defining the engagement catchment area was critical to ensuring that the engagement undertaken was proportionate to the scale and likely impacts of the proposed development.
- A letterbox drop was undertaken. Adjacent and local properties within the defined engagement catchment area were provided a letter with details of the proposed development and how feedback could be provided (via an online community feedback survey). Adjacent property owners were also invited to meet for an individual briefing session.

Figure 27 Engagement Catchment Area



Source: Astrolabe Group

The engagement undertaken was consistent with the community participation objectives in the *Undertaking Engagement Guidelines for State Significant Projects* and complies with the community engagement requirements in the SEARs.

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

A total of three responses were received from the online community feedback survey. The key issues / queries raised were:

- How will the site connect to the proposed ring road?
- Who is the landowner of the site?
- What is the proposed use of the warehouse?
- What are the proposed timeframes for the development?
- Each of these matters are addressed within this report and in the supporting appendices.

5.3 Engagement outcomes with agencies and groups

The consultation undertaken to date has informed and shaped the project as summarised below. This is not an exhaustive list but provides a succinct summary of the considerations that have arisen from the engagement undertaken.

5.3.1 Registered Aboriginal Parties

Consultation with RAPs was undertaken to inform the methodology of the ACHAR (Appendix F) as detailed above. A draft copy of the ACHAR was also provided to the RAPs for review and comment prior to finalisation.

The design of the proposed development has also been informed by a Cultural Overlay Framework. This document has been prepared by Ngurra Advisory (refer to Appendix JJ) and responds to consultation undertaken with Aboriginal stakeholders.

As detailed further in Section 6.1 below, the proposed landscaping, design of amenity spaces and boundary treatments respond to the connecting with country principles.

The proposed landscape design responds to feedback from Traditional Custodians, Elders and Knowledge Holders shared during a Walk on Country and ongoing discussions. The existing environment has been protected and enhanced as far as possible, with native, edible and medicinal planting incorporated into the landscaping design. Indigenous art is also proposed within the central median strip as described further in section 6.1 below.

A First Nations Working Group will also be established to oversee the implementation of the Cultural Overlay Framework.

5.3.2 State Design Review Panel

The SDRP process challenged the design of the proposed development in relation to connecting with Country, design excellence, landscaping, and sustainability and climate change. The SDRP also identified opportunities to review the civil design, enhance worker amenity, provide connections to the ENZ land and provide greater landscaping.

The Design Report prepared by EMKC3 (enclosed in Appendix J) describes how the proposal responds to each of the key matters raised by the SDRP. Recommendations from the panel relating to vehicle and pedestrian access, staff amenity areas and various other matters are incorporated within the design.

Additionally, the proposed development has been informed by a Cultural Overlay Framework. This framework has guided the design of the built form and the proposed site landscaping.

The civil strategy has been revised to minimise the visual impacts of the proposed buildings from views along Martin Road.

5.3.3 Liverpool City Council

Key matters discussed with Council included infrastructure provision (upgrades to Martin Road), landscaping and parking. The proposed approach to the Riparian Street to the north of the site and the Park Edge Street as identified within the WSA Precinct Plan were also discussed.

The Riparian Street relates to a mapped watercourse located adjacent to the northern boundary of the site. The watercourse has been further investigated and was found to be not evidently visible. Notwithstanding, the development has been designed to protect and enhance this corridor. A side setback of up to 27.1m is proposed from Warehouse 1 and native vegetation will be planted along the site's northern boundary. The planting will be managed and maintained in accordance with the Vegetation Management Plan enclosed in Appendix HH.

The design and layout of the proposed development also allows for a Park Edge Street to be delivered to the east of the warehouse buildings. The Park Edge Street has been allowed for and is capable of being delivered at a time when this road connection can be provided into adjacent lots. The Park Edge Street does not form part of this SSDA.

Significant landscaping has been incorporated within the proposal, including on both the ENT and ENZ land. The proposed landscaping approach has been informed by the Aboriginal Cultural Heritage Framework prepared for the site as well as bush fire constraints and the site's ecological characteristics. Tree planting is proposed throughout the car parks as well as along the side boundaries.

5.3.4 Sydney Water

Ongoing design coordination meetings have been occurring fortnightly with Sydney Water in relation to trunk drainage designs and the future regional stormwater basin envisaged to be constructed within the ENZ zone to the east of the developable area.

The ongoing discussions have been centred around potential design solutions to facilitate an ultimate scenario for the proposal and surrounding catchment; the future riparian street to the north of the site and its relationship with future trunk drainage further north (to be constructed running east-west); the future park edge street and its alignment and relationship with the future regional stormwater basin.

5.4 Engagement to be Carried out

The applicant intends to undertake ongoing engagement with Sydney Water to understand timing of the future regional basin.

The applicant will also undertake further engagement with Council in relation to planning for the design, delivery and timing of the surrounding street network.

Further community and stakeholder consultation will be undertaken if the project is approved.

The proposed consultation responds to the community feedback during the preparation of the EIS and the community participation objectives in the *Undertaking Engagement* guide.

EMKC welcomes feedback on the proposal. EMKC will continue to keep stakeholders and the community informed of the project's assessment and approval process through the exhibition and determination phases by:

- Continuing to engage with the community about the Project, its potential impacts, and the approval process.
- Enabling the community to seek clarification about the Project through the relevant communication channels.

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 the table below. This information includes a reference to where these matters have been addressed in the EIS.

Table 19 Key Appendices

Key Appendix	Reference
SEARs compliance table	Appendix A
Statutory compliance table	Appendix B
Proposed mitigation measures table	Appendix E

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

A detailed, comprehensive assessment of the key issues which could have a significant impact on the site and locality has been undertaken in this section. Other impacts which require a standard impact assessment are outlined in Section 6.2.

6.1 Detailed Impact Assessment

6.1.1 Built Form and Urban Design

The site-specific SEARs state that the Applicant must justify the proposed design approach and demonstrate how the built form addresses and responds to the site's context, the surrounding streetscape, and the existing and desired future character of the area. The Applicant is also required to demonstrate how the building design will deliver a high-quality development.

An Architectural Design Report (Design Report) has been prepared by EMKC and is provided at **Appendix J**. The Design Report provides details of the built form and urban design approach undertaken for the proposed development, including due consideration in relation to achieving design excellence and consistency with the Precinct Plan and DCP. The Design Report outlines how the proposed design has responded to the recommendations of the State Design Review Panel (**SDRP**) and the requirements for design excellence under the Precincts SEPP. Additional reports that have informed this section include the Landscape Design Report prepared Geoscapes (**Appendix Y**) Civil Plans and Report by Arcadis (**Appendix O**) and Access Report by Jensen Hughes (**Appendix G**).

6.1.1.1 Existing Environment

The site currently comprises agricultural land with an existing farm dam and associated structures. The Wianamatta (South Creek) vegetated riparian corridor runs north to south along the eastern boundary of the site and is Crown Land.

The site is located a short distance south of Elizabeth Drive (which is to be upgraded) and southwest of the new M12 Motorway (currently under construction). The WSAF and Precinct Plan envisage that the future Eastern Ring Road will be constructed to the west of the site and provide a future connection to Martin Road, a collector road. The Eastern Ring Road will be a primary freight route within the Aerotropolis.

Surrounding land uses currently include the Australian Native Landscapes (**ANL**) facility to the north which comprises several warehouse buildings and large landscaping stockpiles, agricultural farm holdings to the south, and a large brick manufacturing facility to the southwest on the opposite side of Martin Road. The adjoining landholding to the south is owned by Boral and has had SEARs issued for a concrete batching plant.

Whilst the site and surrounding land is predominantly agricultural, it is located within the Badgerys Creek Precinct within the Aerotropolis and a short distance east of the new WSI. The immediate area is expected to undergo significant built form transformation to a new employment precinct to accommodate large format warehousing and other industrial land uses.

The IPG Master Planned Precinct is located 2.5km to the southwest. The IPG Master Plan will catalyse the development of the Badgerys Creek precinct and will set the scale for future employment land uses to the north along Martin Road (Eastern Ring Road) up to Elizabeth Drive. Other future large format warehousing/ industrial land development within this area includes Goodman (225–245 Martin Road), Boral's Concrete Batching Plant (235 Martin Road), the Badgerys Creek Industry Park (85 Martin Road), the Aldi Automated Distribution Centre (475 Badgerys Creek Road) and Elizabeth Enterprise Precinct on Elizabeth Drive.

A Master Plan for Bradfield (a new Metropolitan Centre) has recently been approved to the southwest of the site in the adjoining 'Aerotropolis Core Precinct'. Bradfield will accommodate finer grain urban form and mixed-use development and open space consistent with its role and function.

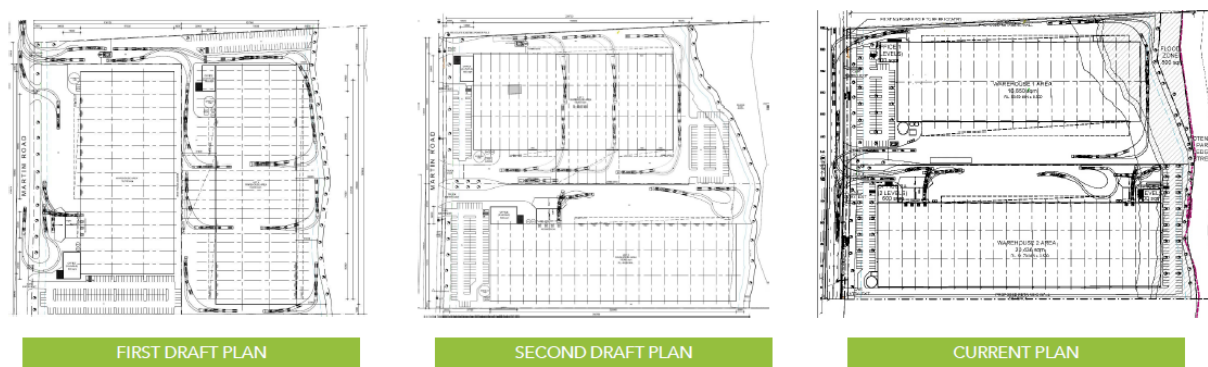
The site analysis has directly informed the built form and urban design approach. Key constraints influencing the design include the significant level change across the site, flood storage requirements associated with the Wianamatta (South Creek) corridor, and the large proportion of land zoned ENZ. These constraints have guided the concentration of built form within the western portion of the site, close to Martin Road, while preserving the eastern ENZ area in its natural state.

The proposed development responds to the site's transitional context by anticipating the future industrial character of the Badgerys Creek Precinct, rather than the site's current rural condition. The built form is therefore designed to align with the scale, function and character of emerging large-format employment uses along Martin Road and the future Eastern Ring Road, while remaining sensitive to the adjoining creek corridor.

6.1.1.2 Design and Layout

The proposed site layout seeks to utilise the available ENT zoned land on the site to achieve the most efficient design outcome whilst satisfying the operational requirements of future tenants. The site layout is the result of an iterative design process that balanced operational efficiency, urban design quality, environmental constraints and safety considerations. As illustrated in **Figure 28**, multiple layout options were tested to optimise building orientation, minimise retaining wall heights, retain visual connections across the site, and improve pedestrian and vehicle safety outcomes in response to feedback from the State Design Review Panel.

Figure 28 Options Testing



Source: EMKC, 2026

The proposed warehouses will be setback from Martin Road and orientated in an east-west alignment. In lot 1 and lot 2 an office building will be located along the western elevation of the warehouse, providing further activation to the Martin Road frontage.

The generous setback to the Martin Road frontage will minimise the visual impact of the warehouses when viewed from the west. The setback will incorporate car parking and significant tree planting in both lots, which will provide natural screening and create an attractive and welcoming appearance.

The orientation of the warehouses will enable both buildings to address Martin Road and minimise the length of any façades along this frontage. The layout will provide a 'break' in the building massing, maintaining views through the middle of the site towards Wianamatta (South) Creek.

The proposed layout facilitates safe and efficient access to both lots, with car parking areas and loading zones all easily accessible from Martin Road.

The proposed layout will result in the following urban design, environmental and operational benefits:

- The proposed layout creates an efficient and sustainable civil design that minimises impacts on adjoining land and the streetscape. The layout minimises the heights of the retaining walls and appropriately responds to the site's flood storage requirements.
- The front building setbacks of 46.85m and 30.45m respectively exceed the minimum requirements of 7.5m set out in the WSA DCP. The side and rear (adjoining ENZ zoned land) setbacks also exceed the minimum requirements of the DCP.
- The site layout supports future infrastructure and does not preclude the delivery the proposed riparian street on the lot to the north and the future park edge street and Sydney Water infrastructure to the east.
- The hardstand areas in each lot have been located adjacent to one another, which results in improved noise outcomes than would otherwise be achieved if separated.
- The site layout separates light vehicles from heavy vehicles within each lot and will help minimise traffic movements within and around the site. Additionally, sufficient space is provided for large vehicles to un-load and manoeuvre within the site, supporting the efficient operation of the warehouses. Dedicated circulation routes are provided for larger vehicles (trucks), cars and pedestrians throughout the site to minimise the risk of conflict and to enhance user safety.
- The layout seeks to maximise landscaping through a generous setback to the Martin Road and the other site boundaries. The layout enables the provision of deep soil and permeable surfaces consistent with the objectives and performance outcomes of the WSA DCP, as well as significant tree canopy coverage despite being constrained by bushfire protection and airport safeguarding requirements. Overall, 69% of the site area will be permeable and 67% of the site area will comprise deep soil. The site will achieve 25% canopy coverage.
- The ancillary office buildings are located to provide easy and convenient access from the car parking areas, whilst activating the Martin Road frontage. Office 2B is afforded an outlook to the ENZ areas and Wianamatta (South) Creek beyond.
- Two separate office and car parks are located within Lot 2, which will provide greater flexibility for the future leasing of this warehouse. The car parking and office buildings have been located at either end of the Warehouse to support the potential occupancy of Lot 2 by two tenants.
- The placement of ancillary office buildings along the Martin Road frontage provides a clear and legible address, mediates the scale of the larger warehouse forms, and contributes to a more human-scaled streetscape. Long warehouse façades are oriented away from Martin Road, with landscape depth and setbacks used as key tools to reduce perceived bulk and soften the industrial interface. The layout also anticipates future precinct infrastructure, including the riparian street to the north and the park edge street to the east, ensuring the development integrates with the planned street network and does not preclude future public domain outcomes.

Figure 29 Proposed site layout



Source: EMKC3, 2026

6.1.1.3 Earthworks

Bulk earthworks will be undertaken to achieve two suitably flat pads for the proposed warehouses, allow for compliant vehicular access from Martin Road and provide the required flood immunity. The proposed surface grading of the site follows the existing site topography, falling from the south-west corner to the north-east corner. Retaining walls are proposed along the southern, eastern, and northern boundaries of the site as existing ground levels vary at the interface with adjoining properties.

The warehouse levels have been set to minimise the visual impact of the development from views along Martin Road. The proposed finished surface levels will be set slightly lower than the existing road corridor. The rear of the ENT zone will employ retaining walls which slope down to the ENZ zone.

Import of clean fill material to the site will be required. All filling will be undertaken in a controlled manner to Level 1 standard with required geotechnical engineering supervision.

All filling has been excluded from those parts of the site mapped as Critical Flood Storage area as part of the 'Wianamatta South Creek Flood Study – Existing Conditions' (Rev I, 2022). Accordingly, the proposed fill encroaches only into the flood fringe and edge of the flood storage area in the 1% AEP flood extent where depths do not exceed 0.6 metres (typically less than 0.3 metres). Encroachment into rarer events such as the 1 in 500 AEP flood and the PMF is similarly small and limited only to the edges of the flood extent in each event.

The earthworks strategy has been developed to support the urban design outcomes of the proposal by minimising the visual prominence of the built form and associated retaining structures. Finished floor levels have been carefully set to sit below the existing Martin Road corridor where feasible, reducing the apparent height of the warehouses when viewed from the public domain.

Retaining walls are limited to those areas necessary to achieve compliant access, flood immunity and functional hardstand areas. Where required, retaining walls are located away from primary public interfaces and will be integrated with landscaping to soften their appearance and reduce visual impact, consistent with the overall built form and landscape strategy.

6.1.1.4 Bulk and Scale

The proposed development comprises two large format warehouses with ancillary office buildings. The bulk and scale of Warehouse 1 responds to the operational requirements of a confirmed occupant (Metroll). Warehouse 2 has been designed to accommodate the needs of typical warehouse tenants. Both warehouses are consistent with the vision for the Badgerys Creek Precinct and the relevant built form controls. The bulk and scale of the development has been deliberately moderated through a combination of building height controls, generous setbacks, articulation of office elements, and extensive landscaping. Although the Precinct Plan permits buildings up to 24 metres in height, the warehouses are limited to approximately 13 metres, reflecting both operational requirements and a conscious effort to reduce visual dominance. There is no maximum floor space ratio control for industrial development, reflecting the unique operating requirements of future industrial tenants within the Badgerys Creek precinct.

The proposed floor to ceiling heights of the warehouses will accommodate the machinery and equipment (e.g. racking) required to support future industrial operations (including Metroll's steel manufacturing) and facilitate better air circulation and lighting, improving overall working conditions inside the warehouse. The office buildings will be significantly smaller than the warehouses, diversifying the building massing within the site and providing opportunities for articulation and variation to the building materials and design.

Overall, the warehouses are consistent with the vision and objectives for the Badgerys Creek Precinct, which is zoned ENT and will accommodate enterprise and light industries that leverage access to freight routes and can take advantage of proximity and direct access to WSI for the production of goods for export. The proposal is of a scale that is commensurate with the future development within the Precinct including the nearby Badgerys Creek Industry Park at 85 Martin Road, the Aldi Automated Distribution Centre at 475 Badgerys Creek Road and the Elizabeth Enterprise Precinct on Elizabeth Drive.

The proposed bulk and scale seek to optimise the available land within the ENT zone on the site whilst responding to the site's constraints which includes a significantly disproportionate area of land zoned ENZ to the east towards Wianamatta (South) Creek, which will remain undeveloped, and contribute to achieving the overall landscape, deep soil and tree canopy objectives within the DCP.

The proposed setbacks will minimise the dominance of the proposed development when viewed from the surrounding public domain. Significant tree planting is also proposed along the site boundaries and within the car parks, which will soften the appearance of the buildings and provide natural screening. The modulation of building mass is further reinforced through the use of smaller-scale office components, varied façade treatments and the retention of visual breaks between buildings. These measures ensure that the development presents as a series of well-proportioned industrial forms rather than a single continuous mass, contributing positively to the evolving character of the Badgerys Creek Precinct.

6.1.1.5 Façade Design, Materials and Colours

A range of building materials, finishes and colours are proposed to address ESD principles, provide visual interest and support wayfinding within the site. The proposed office buildings will be characterised by bright coloured facades and extensive glazing, which will contrast to the warehouses and activate and enliven the site. The colours and finishes of the offices have been informed by extensive consultation with First Nations Working Group that has been facilitated by the project cultural consultant, Ngurra Advisory. Façade design has been used as a key tool to articulate the built form and reduce the perceived scale of

the warehouse buildings. This includes variation in cladding profiles, the use of colour banding and modulation, and the clear differentiation between office and warehouse elements. These strategies improve legibility, support wayfinding and contribute to a higher quality industrial streetscape.

Geometrical patterns and a range of colours are also proposed to articulate the warehouse facades. The proposed finishes predominately consist of low solar absorptance and high Solar Reflectance Index colours. The use of these finishes will create high albedo surfaces and in turn minimise energy consumption by reducing excess heat gain within the warehouse.

Durable and high-quality building materials are proposed to minimise maintenance requirements and support the overall sustainability of the development. Structural steel portal frames, purlins, studs, and roof sheeting as well as a combination of metal cladding in corrugated, flat, and perforated profiles will be utilised within the site. Building services and plant have been integrated into the overall architectural composition to minimise visual clutter and ensure a cohesive appearance when viewed from the public domain. Material selection prioritises durability, low maintenance and long-term performance, supporting a 50-year design life consistent with the objectives of the Precinct Plan and the expectations for development within the Aerotropolis.

Figure 30 Facade design



Source: EMKC3, 2026

6.1.1.6 Accessibility and Inclusive Design

Accessibility and inclusive design have been assessed as part of the Built Form and Urban Design considerations for the project. An Access Design Review has been prepared by Jensen Hughes and is provided at **Appendix G**.

The Access Design Review assesses the proposal against the Disability Discrimination Act 1992, the Disability (Access to Premises – Buildings) Standards 2010, the NCC 2022 (BCA Volume 1, Amendment 2), and relevant Australian Standards including AS 1428.1, AS 1428.4.1, AS 2890.6 and AS 1735.12.

The review confirms that, subject to detailed design, the proposed development is capable of achieving full compliance with applicable accessibility requirements. Key measures include:

- continuous accessible paths of travel from Martin Road and accessible car parking to all building entries;
- provision of accessible car parking within each lot;
- DDA-compliant building entrances, doors, corridors and internal circulation;
- passenger lifts servicing all office levels;

- unisex accessible sanitary facilities on all levels, supported by ambulant facilities; and
- accessible wayfinding and signage to be delivered at detailed design stage.
- The design has also incorporated separation of pedestrian and vehicle movements to enhance safety and accessibility outcomes across the site.

6.1.2 Design Quality

The SEARs include a requirement for a design excellence strategy to be prepared, which demonstrates how the proposed development has been informed by the outcomes of a review by the State Design Review Panel (SDRP), will achieve design excellence and has considered the Connecting with Country Framework.

An Architectural Design Report (**Design Report**) has been prepared by EMKC3 and is included at **Appendix J**. The Design Report describes how the proposed development responds to the site's context as well as to the key comments received from the SDRP during the pre-lodgement review process. The Design Report outlines how the project will achieve design excellence in accordance with the requirements with the WPC SEPP and has been guided by the Government Architect NSW Connecting with Country Framework.

Design Excellence Strategy

The design excellence strategy for the project is articulated through the Design Report and supported by the Connecting with Country Overlay Implementation Framework and Landscape Masterplan. Collectively, these documents establish a landscape-led, culturally informed and functionally robust approach to industrial development that embeds design quality from early concept through to detailed delivery.

The strategy is underpinned by five core principles:

- starting with Country and respecting the cultural and ecological significance of the site;
- prioritising people, safety and amenity within an industrial context;
- a design-led approach informed by ongoing review and iteration;
- landscape as a primary design driver to mitigate scale and reinforce identity; and
- long-term sustainability, durability and adaptability consistent with a 50-year design life.

These principles guide site planning, built form, materiality, public interface treatments and future flexibility, ensuring design quality is maintained throughout the life of the development.

SDRP Feedback

The proposed development has been directly informed by two pre-lodgement reviews by the State Design Review Panel (SDRP). Feedback from the SDRP has materially shaped the site strategy, built form layout, pedestrian safety outcomes, landscape design and the integration of Connecting with Country principles.

Key design responses informed by SDRP feedback include:

- reorientation of buildings and adjustment of pad levels to minimise retaining wall heights and improve views toward South Creek;
- consolidation and reduction of vehicle access points along Martin Road to improve pedestrian safety and public domain amenity;
- introduction of fully separated pedestrian pathways linking Martin Road to office entries, avoiding conflicts with vehicular movements;
- increased provision of staff amenity areas directly connected to office lunchrooms and landscaped outdoor spaces;
- expansion of deep soil zones, permeable surfaces and contiguous planting corridors within the ENT zone; and
- strengthening of landscape-led responses to mitigate the visual scale of industrial built form and reinforce cultural connections to Country.

A detailed response to each SDRP recommendation is provided in Section 5 of the Architectural Design Report, demonstrating how review outcomes have been embedded into the final design. Given the scale of

this project, further design reviews post lodgement are not anticipated. Notwithstanding this, it is acknowledged that the consent authority retains the discretion to refer the project to the GANSW/SDRP for further design review and advice through the assessment of the application. Any future applications (including modifications) would be bound by existing statutory requirements relating to design excellence and the approved design documentation that underpin the design excellence strategy for the project. This includes referral to the SDRP if required under the Precincts SEPP.

The proposal comprises a contemporary industrial development consistent with vision and objectives for the Badgerys Creek Precinct and the Aerotropolis. It provides a high quality and sustainable response to the site's context (incorporating a range of high quality and durable materials and finishes) and is informed by both the requirements set out in the Precinct Plan and DCP as well as comments received from extensive engagement with agencies including the SDRP.

Design Excellence – Precinct SEPP

The proposed development demonstrates design excellence in accordance with Part 4.5 of the Precincts SEPP and the objectives of *Better Placed*. The design responds to its Aerotropolis context through a robust industrial form that is carefully modulated by setbacks, landscape depth and material variation. Safety, accessibility and wellbeing are prioritised through human-centred design measures, including high levels of natural light to offices, north-facing orientation, shaded outdoor amenity areas and clear separation of pedestrian and vehicle movements.

Durability, adaptability and long-term performance are embedded through the selection of high-quality, low-maintenance materials, flexible warehouse layouts capable of future subdivision, and a design life exceeding 50 years. Sustainability initiatives, including solar PV, rainwater harvesting, permeable paving and heat-mitigating material choices, support a resilient and climate-responsive outcome consistent with *Better Placed* principles.

An assessment of the proposal against the provisions of Section 4.33 ('Design Excellence') of the Precincts SEPP is set out in the table below.

Table 20 Compliance with Precincts SEPP Section 4.33 (Design Excellence)

Requirement	Compliance
(1) <i>In considering whether development exhibits design excellence for the purposes of this Part, the consent authority must have regard to the following matters</i>	
(a) whether the development responds to the physical and cultural connection of the local Aboriginal community to the land	The proposed development has been informed by engagement with Darug Elders, Knowledge Holders and Community members. A series of design priorities and key themes have been identified for the site. The landscape design presents a significant opportunity to reawaken memory and commence the process of healing through revitalising local species of the Cumberland Plain that have long been used as resources for the Darug people. A range of native plants will be used throughout the site, which will provide learning opportunities for visitors and is an important step in healing the Country by restoring plants and animals that have been lost. Additionally, plant species with cultural, practical and medicinal uses are proposed throughout the site. The proposal also seeks to respond to the physical and cultural connection of the local Aboriginal community to the land through various other design measures. These include etching in concrete walls (including a welcome to country); aboriginal language embedded within walls and stairs and the display of Aboriginal artwork within the site. Additionally, the colours used on the office facades have been informed by consultation with Elders and Knowledge Holders and the innovative use of colours and

Requirement	Compliance
	textures will be explored throughout the interior of the proposed buildings to represent the Cumberland Plain and Waterways used by the Cabrogal people. Further, within the architectural palette, colour tones and textures have been carefully selected to reflect the natural characteristics of Country. Warm, earthy hues inspired by Wianamatta Shale and the surrounding landscape are proposed to be incorporated into the finishes, feature walls and entry elements, anchoring the building's within its broader cultural and ecological context. Whilst the warehousing typologies limit opportunities for formal architectural expression, the interventions proposed ensure that the built form still carries cultural meaning, offering an ongoing and evolving response to Country that extends beyond function to foster awareness, respect and connection. In addition, the landscape and open space design offers a meaningful response to Country by centring connection to water, wellbeing, and community through a carefully considered gathering space. This area supports rest, reflection, and cultural connection, drawing inspiration from the significance of water as a source of life and healing. The design acknowledges Wianamatta as a living entity, recognising its spiritual, cultural, and ecological importance for Aboriginal people. This connection to water is honoured through gentle topography, water-sensitive planting, and reflective spaces that invite contemplation and storytelling.
(b) whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved,	The proposed development will appear as contemporary, functional and fit for purpose warehouse buildings that are consistent with the desired future character of the Badgerys Creek precinct. Whilst the need for operational functionality, circulation and efficiency of the warehouses limits the opportunities for architectural expression, the design team has considered how it will maintain a high standard of architectural design quality through the use of different materials, finishes and colours. The ancillary offices will include a high level of internal amenity and comfort through the use of glazing. The office components will incorporate vibrant colours that have been selected following consultation with the First Nations Working Group. The buildings will utilise a range of finishes, materials and colours that will provide visual interest when viewed from the surrounding public domain. The warehouse facades will include alternating coloured cladding that will reduce excess heat gains and minimise energy consumption.
(c) whether the form and external appearance of the development will improve the quality and amenity of the public domain,	The proposed warehouses are of a form and scale commensurate with their intended use and the type of building that is anticipated to be delivered throughout the Badgerys Creek precinct and on ENT zoned land. Notwithstanding, the proposed civil strategy seeks to minimise cut and fill to reduce the visual impact of the warehouses and ensure that they do not appear out of scale whilst maintaining large level pads for functionality. Ancillary office buildings are

Requirement	Compliance
	proposed along the western elevations of the warehouses. The office buildings will activate and enliven the Martin Road frontage. An additional ancillary office building will be located at the eastern end of Warehouse 2 providing activation and surveillance over the adjacent ENZ and future park edge street. The warehouses and ancillary office buildings will utilise a range of materials and finishes, providing a contemporary appearance that enhances the appearance of this future industrial precinct. The proposed landscaping will positively contribute to the existing and evolving streetscape along Martin Road. Significant tree planting is proposed along the frontage and within the car parks (setbacks). The landscaping will integrate with the public domain and will screen and soften the appearance of the warehouse buildings and create attractive and welcoming entrances to the site.
(d) whether the development detrimentally impacts on view corridors.	The visual impacts of the proposed development have been minimised through the proposed architectural and civil design. A visual impact assessment has also been prepared (refer to Appendix X) and demonstrates that the proposal will not detrimentally impact key views. As a result of the disproportionately large area of the site zoned ENZ, the footprint and massing of the proposed development has been located entirely in the western part of the site near to the Martin Road frontage. Whilst this will reduce views across the site from Martin Road towards South Creek the topography of the site and the proposed layout will ensure some views are maintained through the centre of the site. It is also important to note that these view impacts will be localised to the site, short term and temporary. Given the undeveloped nature of the surrounding land, expansive views will be available adjacent to the site in the short to medium term. Once adjacent sites develop and the Aerotropolis is delivered, the future road network will ensure that important visual connections are provided to the creek corridor. The adjacent Riparian Street to the north will provide a key view and ecological corridor to Wianamatta South Creek. A future collector road to the south will provide an additional view corridor and connection. Both roads, in addition to the park edge street will ensure key views are maintained.
(2) <i>The consent authority must also have regard to how the development addresses the following matters –</i>	
(a) the suitability of the land for development	The proposed buildings, hardstand, car parking and associated infrastructure are all located within the ENT zone. The proposed uses are permitted with consent and fully consistent with zone objectives and the type of enterprise/light industrial development envisaged in the Precinct Plan for the Badgerys Creek precinct. These uses are suitable in this location which is close to existing and future infrastructure including WSI, the M12 motorway, upgraded Elizabeth Drive, and the future Eastern Ring Road.

Requirement	Compliance
	A significant portion of the site is zone ENZ which includes areas that are more environmentally constrained. Aside for future roads and Sydney Water infrastructure, these areas will be protected as the development will take place within less constrained ENT zoned areas of the site.
(b) the existing and proposed uses and use mix	Whilst the existing use is for agriculture, the site is located within the Badgerys Creek precinct of the Aerotropolis, which is a planned future light industrial / enterprise precinct. The proposed land uses are consistent with the vision and objectives of the precinct.
(c) Aboriginal heritage	An Aboriginal Cultural Heritage Assessment Report and Cultural Overlay Framework (Connecting with Country Report) have been prepared to support the SSDA. The proposal has been informed by ongoing consultation with Knowledge Holders and Darug Elders. These reports will guide the future development of the site and will be key reference documents for any future tenant fitout and development as part of the design excellence strategy.
(d) the relationship of the development with other buildings (existing or proposed) on the same site or neighbouring sites in terms of separation, setbacks, amenity and urban form,	The two warehouses will be located on separate lots for leasing purposes and have been designed to operate entirely independently of one another. Separate access / exit driveways are proposed to each warehouse from Martin Road and internal site fencing will be installed between the warehouses. Generous setbacks are proposed to Martin Road frontage, the southern and northern boundaries, and to the future Park Edge Street to the rear. The setbacks will incorporate planting and other landscaping as far as possible. These setbacks have been designed with consideration of future neighbouring development. Appropriate separation and interface design has been undertaken to ensure a cohesive outcome can be achieved across adjacent properties. Whilst the surrounding land is predominantly rural with some mining and landscape industries, the future development surrounding the site is expected to align with the vision for the Badgerys Creek Precinct for light industry/enterprise uses. The design is sympathetic to future planned development of neighbouring properties by aligning with the current development controls and supporting the objectives of the ENT zone.
(e) the bulk, massing and modulation of buildings,	The bulk and massing of the proposed buildings reflect the anticipated operational requirements of future tenants and are modest in comparison to many contemporary warehouse and distribution centre facilities. The buildings have been designed to minimise adverse visual impacts of the development and to ensure that views from Martin Road towards Wianamatta Creek can be maintained as far as reasonable noting that new view corridors to the creek will be created by the delivery of the Aerotropolis Road network which includes a Riparian Street adjacent to the northern boundary of the site.

Requirement	Compliance
(f) street frontage heights,	The proposed development complies with the height of building control which is 24m. In addition, buildings will be setback 46.9m and 30.5m from the Martin Road frontage respectively. The buildings will appear as well-proportioned and contemporary industrial buildings in-keeping with the type of development envisaged for the Badgerys Creek precinct. The warehouses will have a height of less than 13 metres and include smaller office components located along their western elevations facing Martin Road. Given the size and scale of the proposed warehouses, and the significant front setbacks, the buildings will not appear as over-bearing and are fully appropriate for the site.
(g) environmental performance and amenity standards, such as sustainable design, overshadowing and solar access, visual and acoustic privacy, noise, wind and reflectivity,	The proposed development incorporates various sustainability measures to promote high environmental performance. These design measures include (but are not limited to): ▪ Ancillary offices that have been oriented to the north to maximise sunlight received and reduce demand on heating systems. ▪ Building fins to provide additional shading ▪ Translucent roof sheeting to reduce solar glare ▪ Roof materials and colours to minimise heat absorption, optimising internal temperature control. ▪ Shading provided to the outdoor amenity areas.
(h) the achievement of the principles of ecologically sustainable development,	The proposed development is consistent with the principles of ecologically sustainable development (ESD) as described in the accompanying ESD report and section 6.2.13 below.
(i) pedestrian, cycle, vehicular and service access and circulation requirements, including the permeability of pedestrian networks,	Pedestrian pathways will be provided from Martin Road into the two lots. The pedestrian pathways will provide safe and direct access for pedestrians and cyclists to the office building and cycle parking. Internal pedestrian and maintenance access will be provided to the ENZ. The future Aerotropolis road network will provide access from Martin Road to the future Park Edge Street which could potentially provide public access to the Wianamatta Creek corridor depending on the outcomes of the Wianamatta Precinct Delivery Strategy being developed by DPHI. However, it is noted that until this is developed the areas of the site zoned ENZ will remain in private ownership with access restricted to workers on the site and maintenance for the future Sydney Water infrastructure. Whilst this project doesn't include the delivery of the portion of the Park Edge Street on this site, nor does it contemplate the dedication for any land for that purposes, it has allowed for sufficient space for this to be delivered in the future at a time when adjacent lots are developed and the surrounding collector road network delivered under Liverpool Aerotropolis Contributions Plan.

Requirement	Compliance
(j) the impact on, and proposed improvements to, the public domain,	The project will facilitate improvements to the public domain by integrating landscape elements that promote native landscaping, create shade and improve visual appeal. Generous tree planting is proposed along the site's Martin Road frontage as well as varied facade colours, shaded parking, and pedestrian pathways soften the industrial impact.
(k) the impact on special character areas,	Not applicable
(l) achieving appropriate interfaces at ground level between the building and the public domain,	The proposed development will operate as a private industrial facility and will not include any public domain areas within the site. Notwithstanding, the proposed scale and massing of the development has been carefully considered and is fully appropriate for the site. The interfaces with Martin Road (west) and the ENZ zone (east) have been designed to ensure adequate separation, landscaping and façade treatment is achieved to create a high-quality interface. These interfaces will provide an appropriate address to the future riparian street and park edge street which will provide public domain and landscaping in accordance with the relevant street cross sections in the DCP.
(m) architectural diversity where the development is to consist of more than 2 buildings.	The two warehouses have been designed to present as related but independent buildings. The office buildings will each be finished with a distinct colour to support the separate identify of the different tenancies, assist wayfinding, and to provide further visual interest in the site. In addition, the proposal will support a diversity in function between the larger Metroll warehouse and the smaller speculative warehouse. This will support a broader range of employment land uses and functional flexibility.

Connecting with Country

The design has been informed by early and ongoing engagement with Cabrogal/Darug Elders, Knowledge Holders and community members, facilitated by Ngurra Advisory. Engagement commenced at the outset of the design process and included a Walk on Country in February 2024, which directly informed site planning, landscape strategy and material expression.

A Cultural Overlay Implementation Framework has been prepared and will continue to guide detailed design, construction and future tenant fit-outs. A First Nations Working Group has been established to provide ongoing advice, ensuring cultural narratives, planting strategies, public art and interpretive elements are respectfully integrated and protected throughout the life of the project.

Connection with Country is expressed primarily through a landscape-led approach, incorporating endemic plant communities, native edible and medicinal species, repurposed tree skeletons, water-referencing motifs, Darug language etching ('Warami') and public art developed in collaboration with Indigenous artists.

Maintaining Design Quality

Design quality will be maintained through the life of the project via the implementation of the submitted Architectural Design Report, Landscape Masterplan and Connecting with Country Framework. will inform detailed design, construction and any future adaptations to the buildings, including tenant fit-outs. The consistent application of agreed material palettes, landscape strategies and cultural overlays will ensure that the design intent approved through this application is realised on site and retained over time. These

documents can be included in the approved documentation and conditions of consent consistent with the approach taken for other approved development within the Aerotropolis.

6.1.3 Visual Impact

The site-specific SEARs include a requirement for a visual impact assessment to be prepared, which assesses the proposed development's impacts on nearby public and private receivers and significant vantage points in the broader public domain. The assessment is also required to consider the layout and design of the development having regard to the surrounding vehicular, pedestrian and cycling networks including views from the proposed Park Edge Street.

Accordingly, a Landscape and Visual Impact Assessment (**LVIA**) has been prepared by Habit8 and is enclosed at **Appendix Y**. The LVIA has been prepared in accordance with the *Guidelines for Landscape and Visual Impact Assessment – Third Edition* (LI/IEMA, 2013) in order to analyse the potential visual effects of the proposed built form on nearby sensitive visual receivers and public domain views from key locations surrounding the site. The LVIA considers the magnitude of change and significance of the impact in relation to landscape changes and potential visual impacts as a result of the proposal.

6.1.3.1 Existing environment

The site is located along Martin Road within the Badgerys Creek Precinct under the Western Sydney Aerotropolis. The immediate locality is envisaged for future intensification and urban renewal supporting the closely located Western Sydney Airport. The nearest sensitive receivers include rural-residential receivers to the east of Wianamatta-South Creek in the suburb of Kemps Creek. Habit8 note, that views at a variety of distances were considered during the preparation of the LVIA, for which the site's visual catchment is surrounded by similarly zoned ENT & ENZ properties, with wider receivers zoned RU4 Primary Production Small Lots to the east as mentioned above. In terms of potential visual impacts, Habit8 assume the significance of visual impacts in relation to the properties zoned RU4 will be negligible/minor.

In relation to landscape value and significance, the site generally comprises an undulating landform, with elevations ranging from RL46 (east) to RL58 (west). A local value may be held by some visual receptors with high sensitivity to the site along Martin Road and passing pedestrians and motorists of medium sensitivity; however, these views are likely to be based on perceptual aspects such as wildness, tranquillity, land use and open space.

The LVIA involved an analysis of a range of viewpoints from which the proposed development may have a potential visual impact. An extract of the viewpoint location map is provided below. Existing and proposed viewpoints are also provided. The viewpoints chosen in the figures have been extrapolated based on their overarching sensitivity and significance.

Figure 31 Viewpoint Locations



Source: Habit8, 2025

In accordance with the viewpoint location map, the locations assessed include:

- Viewpoint A: Along Martin Road (looking north)
- Viewpoint B: Along Martin Road (looking east)
- Viewpoint C: Along Lawson Road (looking east)
- Viewpoint D: From Lot 1 hardstand (looking east)
- Viewpoint E: Along Braikfield Avenue (looking southwest)
- Viewpoint F: From South Creek (looking west)
- Viewpoint G: From future potential Park Edge Street verge (looking west) (N.B – the VIA considers the view impacts from this location following the construction of the Park Edge Street in the future by the relevant roads authority).

6.1.3.2 Potential Impacts

The LVIA methodology identifies objective visual baseline information in relation to the site and surrounds, analyses the extent of visual impacts and qualifies the magnitude and significance of change anticipated to occur from various viewpoints locations / sensitive receiver locations. A summary of the potential visual impacts for each of the viewpoint locations is outlined in **Table 21** below.

Table 21 Summary of Potential Visual Impacts

Viewpoint Location	Visual Effects of the Proposal		Overall Impact
	Visual Sensitivity	Magnitude of Change	
Viewpoint A	Low landscape receptor sensitivity. Medium visual receptor sensitivity	High landscape receptor magnitude of change. High visual receptor magnitude of change.	Moderate
Viewpoint B	Low landscape receptor sensitivity. Medium visual receptor sensitivity	High landscape receptor magnitude of change. High visual receptor magnitude of change.	Moderate
Viewpoint C	Very low landscape receptor sensitivity. Very low visual receptor sensitivity	Low receptor of change. Low magnitude of change.	Negligible
Viewpoint D	High landscape receptor sensitivity High visual receptor sensitivity.	Low landscape receptor of change Very low visual receptor magnitude of change	Minor
Viewpoint E	Medium landscape receptor sensitivity. High visual receptor sensitivity	Very low magnitude of change. Low receptor of change.	Minor/negligible
Viewpoint F	Medium landscape receptor sensitivity. Low visual receptor sensitivity	Medium landscape receptor magnitude of change. Medium visual receptor magnitude of change.	Minor
Viewpoint G	Low landscape receptor sensitivity Low visual receptor sensitivity	Medium landscape receptor magnitude of change. Medium visual receptor magnitude of change.	Minor

Source: Habit8

Viewpoint A

The significance of the impact of Viewpoint A is assessed to be moderate. This is due to the proposed building's street presence as this is the primary frontage. Landscape and design strategies are proposed to reduce the proposals impact on the streetscape. The following figure demonstrates the future development over time and the visibility of the built form.

Figure 32 Viewpoint A Photomontages



Picture 9 Baseline Photo – Viewpoint A

Source: Habit8



Picture 10 Year 0 – Viewpoint A

Source: Habit8



Picture 11 15 Years – Viewpoint A

Source: Habit8

Viewpoint B

The significance of the impact of Viewpoint B is assessed to be moderate. This is due to the buildings proposed street presence and direct view to the primary frontage. The proposed design employs an articulated façade and considerable landscaping to reduce the proposal's impact at this interface. The following figure demonstrates the future development over time and the visibility of the built form.

Figure 33 Viewpoint B Photomontages



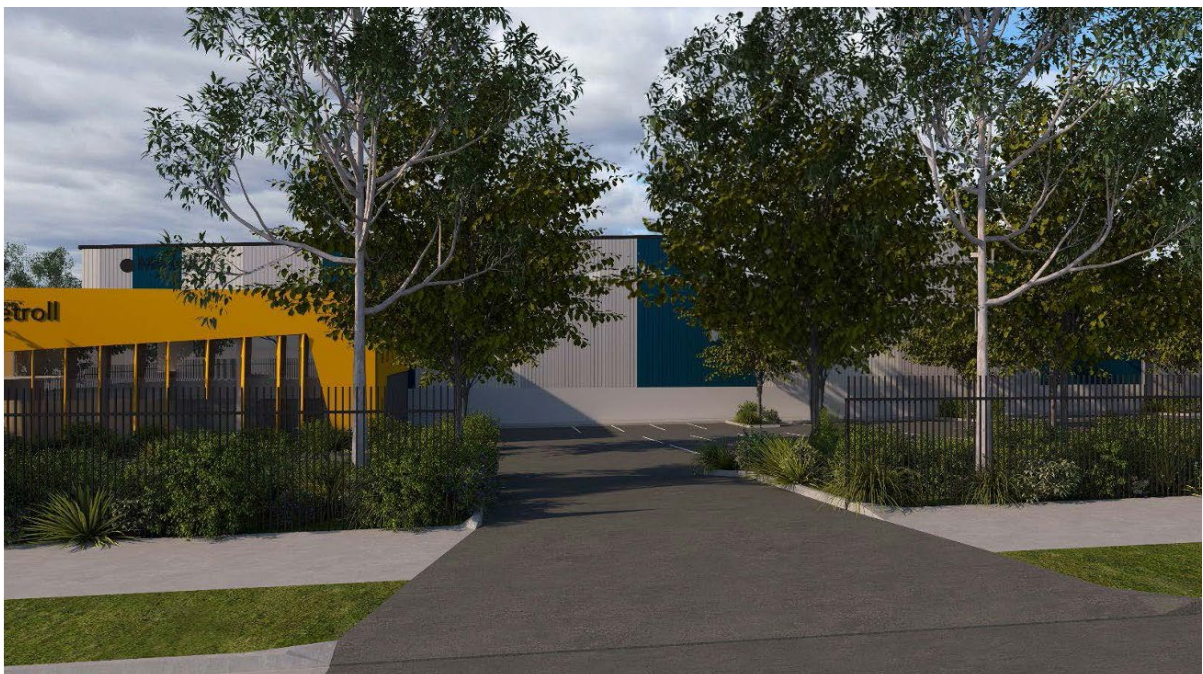
Picture 12 Baseline Photo – Viewpoint B

Source: Habit8



Picture 13 Year 0 – Viewpoint B

Source: Habit8



Picture 14 15 Years – Viewpoint B

Source: Habit8

Viewpoint G

The significance of impacts for Viewpoint G (from the future Park Edge Street looking west) is assessed to be minor. The proposed development will form a new and recognisable element within the view. However, the proposed landscaping and articulated building façade will reduce the proposal's impact on the streetscape. Indicative Possible Park Edge Street has been included for the purposes of the VIA however may not be in place in Year – 0 noting that this application only proposes the reservation of the Park Edge Street corridor with the delivery of the road to be undertaken by the relevant Roads Authority.)

Figure 34 Viewpoint G photomontages



Picture 15 Baseline Photo – Viewpoint G
Source: Habit8



Picture 16 Year 0 – Viewpoint G
Source: Habit8



Picture 17 Year 15 – Viewpoint G
Source: Habit8

Overall, the proposal will generate change in views to a small number of properties. View impacts from adjacent residential properties to the east will mostly be ameliorated through screening vegetation which will increase over time as the plantings reach maturity.

Road users, pedestrians and cyclists will experience a minor change in views, which is expected of development and transition in character within Western Sydney Aerotropolis.

In summary, no significant visual impacts are likely to be generated by the proposal. The development is proposed to be heavily landscaped in its setbacks to help soften and screen views.

6.1.3.3 Mitigation Measures

The proposed development employs considerable landscape planting to offset the visual impact at the property boundaries. It will provide vegetation screening through dense tree and shrub planting within the landscape setbacks, which will be most effective after 15 years for those receptors who receive direct views. In addition to this, the surrounding adjacent properties will experience considerable development under the Enterprise zoning. As such, the future character of the area will transition, and the development will be amongst other large logistics style warehouse development.

6.1.4 Trees and Landscaping

The site-specific SEARs include a detailed site-wide landscaping plan, which is required to include:

- An arborist report, tree protection plan and vegetation management plan;
- Detailed landscaping plans;
- Demonstration of how the development will contribute to the long-term landscape setting (including increased urban tree canopy cover); and
- Demonstrate consistency with the WSA Landscape Species List.

A Preliminary Tree Assessment / Arboricultural Impact Assessment (**AIA**) has been prepared by Tree Survey and is enclosed at **Appendix KK**. The AIA assesses the impacts on trees across the site, identifying species for retention, replanting, and removal in accordance with Australian Standard AS4373-2007 and relevant controls under the WSADCP and the Liverpool Development Control Plan 2008. A Tree Protection Plan will be implemented in accordance with the AIA which can be included as a condition of consent,

A Landscape Masterplan has also been prepared for the site by Geoscapes and is enclosed in **Appendix Z**. The proposed approach reflects feedback from various stakeholders, including First Nations groups, local and State Government, and the SDRP. Tree maturity heights and spacing are shown on the Landscape Design Report within the planting schedules

A Vegetation Management Plan (VMP) has been prepared by Land Eco Consulting and is provided at **Appendix FF**. The VMP will govern site-wide vegetation management, revegetation, weed control and monitoring for a minimum period of five years following commencement of works.

A Wildlife Hazard Assessment and Wildlife Management Plan has also been prepared by Land Eco Consulting (**Appendix GG**) to address aviation safeguarding requirements associated with the site's location within the 3 km wildlife buffer of Western Sydney International Airport. This report informs species selection, planting configuration and long-term vegetation management to minimise wildlife attraction risk.

6.1.4.1 Existing environment

The site's landscape character comprises grassland associated with agricultural uses. The eastern part, adjoining South Creek, is a high biodiversity value area with various trees. A farm dam is located centrally, adjacent to the northern boundary. The AIA identified 66 trees across the site. The existing landscape context, including extensive exotic grassland, a central artificial waterbody and remnant riparian vegetation along Wianamatta–South Creek, has informed the proposed landscape response. In particular, the retention and enhancement of vegetation within the ENZ-zoned land seeks to strengthen existing ecological corridors while avoiding the introduction of new wildlife attractants within the developable area of the site.

6.1.4.2 Connecting with Country and Greener Places

Connection to Country is integral to the proposed landscaping approach. As illustrated in the figure below, key components of the proposed development have been inspired by Country and include:

- Feature *Brachychiton ruprestis* (Queensland Bottle tree) to be planted at entrances and exits for wayfinding.
- Feature laser cut fence panels incorporating native animal species (**Figure 35**).
- Indigenous art, endemic trees and river bank style planting are proposed within a central median strip between the heavy vehicle entry/exit for each site.
- Amenity spaces that have been designed with waterway connections.
- Explorative walkways; a naturalist herb garden and native edible and medicinal plants are also proposed.
- Existing trees have been retained on the site (66 in total). No trees are proposed to be removed.

The proposed landscaping approach responds to the different ecological 'management zones' within the site and addresses the principles of *Greener Places* as set out below:

- **Integration** – the proposal seeks to combine green infrastructure with an industrial land use. Plant species have been carefully selected to enhance biodiversity and ecological resilience. Planting is proposed throughout the car parking areas to provide shading, enhance the amenity of the site for future staff and visitors, and to mitigate the urban heat island effect.

- **Connectivity** – the landscape design seeks to integrate the proposed development with the future Park Edge Street, which will be delivered by others. The Park Edge Street will create a connection with surrounding development as well linking the proposed warehouses to the ENZ zoned land. Existing trees have been retained as far as possible and the landscape character of the site enhanced through the planting of additional native trees in the ENZ land.
- **Multifunctionality** – the proposed development incorporates several high-quality green spaces, which will serve a range of functions. This includes carefully designed amenity spaces that will contain native and low maintenance plant species and provide a range of environmental and social benefits.
- **Participation** – the proposed landscaping approach has been informed by the knowledge of the First Nations Working Group, as well as engagement with government stakeholders. The landscaping masterplan seeks to respond to the controls in the WSA DCP and the site's context.
 - The staff amenity spaces will incorporate plant species that are edible and/or with medicinal uses, providing a clear connection to Country. The proposed amenity spaces have been located to ensure that they are easily accessible to staff and designed to provide flexibility of use with seating areas and shade structures. The proposal seeks to maximise tree canopy coverage, whilst responding to operational requirements and site constraints such as airport safeguarding and bushfire. Existing trees have been retained where practicable and feasible.
 - Landscaped setbacks are proposed along each of the site's boundaries in accordance with the Aerotropolis DCP. Along Martin Road, large tree planting is proposed, which will screen and soften the appearance of the warehouse buildings over time as shown in the VIA. The landscaping will create a visually appealing frontage along the western boundary of the site whilst allowing for the potential future widening of Martin Road. Additionally, planting is proposed to the rear of the Warehouse buildings, providing a landscaped buffer to the future Park Edge Street and ENZ beyond.
 - The proposed planting will comprise both native and locally endemic tree species, including the Cumberland Plain Woodland plant community and the River Flat Eucalypt Forest plant community trees. Flood tolerant trees, shrubs and groundcovers are proposed within flood affected areas of the site, including the threshold of ENT and ENZ zoned land.
 - The proposed plant species selection has been informed by Traditional Custodians the majority of which are included within the recommended species list in the Aerotropolis DCP.
 - Overall, a high-quality landscaping approach is proposed has been informed by Country and responds to the desired future character of the Badgerys Creek precinct which is intended to provide land for a range of enterprise and light industrial land uses that will benefit from the proximity to WSI.
 - The site benefits from a disproportionately large 15.7ha area of land zoned ENZ fronting Wianamatta (South) Creek. This enables the retention of considerable areas for deep soil, permeability and tree planting which offsets the relatively limited areas of ENT zoned land to be developed fronting Martin Road. Native and endemic species have been prioritised and significant planting is proposed to enhance local biodiversity and ensure that the development will be well integrated with the surrounding built and natural environment. The proposed approach responds to bushfire and other site constraints and will create a highly desirable place to work and visit.

Figure 35 Laser cut fence panels incorporating native animals species



Source: Geoscapes, 2026

6.1.4.3 Tree Canopy and Deep Soil

Tree canopy coverage for the site has been calculated in accordance with the Western Sydney Aerotropolis Development Control Plan and is summarised in the Landscape Report and DCP Compliance Tables. Canopy coverage figures are based on the expected mature canopy spread of trees, rather than planting size at installation.

The proposed development achieves the following canopy and deep soil outcomes:

Tree canopy coverage (minimum requirement: 25% of site area):

- Whole site: approximately 25% tree canopy coverage
- Enterprise Zone (ENT): approximately 15% tree canopy coverage
- Environment and Recreation Zone (ENZ): approximately 35% tree canopy coverage

Deep soil provision (minimum requirement: 15% of site area):

- Whole site: approximately 69%
- Enterprise Zone (ENT): approximately 10%
- Environment and Recreation Zone (ENZ): approximately 100%

Canopy coverage and deep soil provision within the developable ENT zone is constrained by operational requirements, Planning for Bushfire Protection 2019 asset protection zones and aviation safeguarding controls associated with the Western Sydney International Airport. These constraints limit opportunities for large canopy trees within the ENT zone.

New planting is proposed throughout the site, including a mix of local endemic and native trees to strengthen the tree canopy. The proposed planting seeks to connect to the wider green infrastructure and create an urban habitat corridor that supports the long-term viability of local biodiversity. Planting within the ENZ zoned land will enhance this area and the site's connection with South Creek to the east. Planting is also proposed within the car parking areas to avoid large expanses of hardstand.

Notwithstanding these constraints, the overall site meets the Aerotropolis DCP canopy and deep soil objectives when considered in aggregate based on site area. The substantially higher levels of deep soil and tree canopy within the ENZ zone, achieved through retention of existing vegetation and extensive revegetation, offset the reduced provision within the ENT zone and contribute to long-term cooling, biodiversity enhancement and visual integration of the development within the broader landscape setting of the Aerotropolis.

Tree planting has been clustered and spaced to ensure trees can reach their intended mature height and canopy spread without conflict with built form, services, bushfire requirements or operational airspace.

6.1.4.4 Species Selection and Wildlife Management

Plant species selection has been undertaken in accordance with Appendix B of the DCP and has been reviewed by a qualified ecologist as part of the Vegetation Management Plan and Wildlife Hazard Assessment and Wildlife Management Plan.

The majority of species proposed within the development footprint and surrounding landscape are drawn from the Aerotropolis Landscape Species List. A limited number of additional species have been assessed by Land Eco Consulting and confirmed as unlikely to attract large-bodied birds or flying-foxes that may pose a risk to aviation safety. No species identified as not permitted within the 3 km wildlife buffer are proposed.

The Wildlife Hazard Assessment and Wildlife Management Plan confirms that:

- the proposed landscaping will not introduce new habitat features likely to increase bird or bat strike risk beyond existing baseline conditions;
- the bioretention basin will have limited standing water and no submerged vegetation, reducing its attractiveness to hazardous waterbirds; and
- ongoing monitoring and adaptive management will be implemented should wildlife attraction levels change over time.

The mitigation measures presented in the VMP and Wildlife Management Plan are provided in section 6.1.4.6 and have been included in the Mitigation Measure table at **Appendix E**.

6.1.4.5 Tree Retention and Removal

A total of 66 trees were assessed as part of the AIA for which 62 trees were identified within the ENZ zone (which will be retained) and four (4) trees within the northern boundary on the adjoining site. All trees are located outside the developable area and will not be impacted by the Proposal.

In relation to the trees identified, the following is noted:

- 10 trees have been assessed as a low priority for retention. Therefore, these trees are not considered important for retention, nor do they require special works to be implemented for their retention. These trees are located within the ENZ zone.
- 43 trees have been assessed as a medium priority for retention. These trees are considered less critical; however, their retention should remain a priority, with removal considered only if adversely affected by building works. Note, the trees within the ENZ zone will remain untouched; however, until the detailed design of the riparian street is considered in further detail by Council, the Applicant and the adjoining landowner, impacts of the four (4) trees in the adjoining site along the site's northern boundary cannot be confirmed.
- 13 trees have been assessed for high priority for retention. These trees will not be impacted by the works.
- Notwithstanding the assessment undertaken, zero (0) trees are to be removed and 66 trees (all-assessed) will be retained.

6.1.4.6 Mitigation Measures

In relation to tree removal, the hierarchy for the management, preservation, retention, clearing and removal of trees comprises avoidance; minimisation; and mitigation. Recommendations in relation to tree removal are noted as follows:

- Avoiding impact:

- Relocation of infrastructure to maximise the distance between trees and proposed works.
- Relocation of underground services to maximise the distance between trees and proposed works.
- Minimising impact:
 - Design modification to maximise the distance between trees and proposed works.
 - Bridging the root zone by utilising suspended slabs, elevated walkways and boardwalks.
 - Pier and beam footing design.
 - Cantilevered design.

Further methods in relation to strategies and recommendations to avoid impacts on trees are outlined in **Table 22** below as stipulated by Tree Survey in the AIA.

Table 22 Methods to Avoid and Minimise Impact

Construction Impact	Methods to Avoid or Minimise Impact
Cut and fill (grading)	▪ Restrict stripping of topsoil within the TPZ. ▪ Utilise retaining walls as an alternative to grading or battering to maximise the distance between trees and excavations. ▪ Woody vegetation to be removed adjacent to retained trees should be cut at ground level and not pulled out by machinery or equipment.
Retaining walls	▪ Design walls with pier foundations to bridge tree roots. ▪ Utilise retaining walls with discontinuous footings to maintain natural grade as far as possible from trees. ▪ Relocate retaining walls to maximise the distance between trees and the construction footprint.
Roads	▪ Use retaining walls at the edge of the roadway as opposed to grading or battering to maximise the distance between trees and excavations. ▪ Utilise suspended slabs or cantilevered sections. ▪ Limit excavation for sub-grades ▪ Construct at or above existing ground level where possible.
Pathways	▪ Utilise suspended walkways such as boardwalks or pier and beam bridges. ▪ Utilise articulated pavement with a 100mm thick gravel subbase over tree roots. ▪ Split or narrow shared pathways to avoid trees. ▪ Use paving materials requiring a minimum amount of excavation such as reinforced concrete. ▪ Specify minimum subgrade compaction under pavement within the dripline. ▪ Utilise permeable paving materials such as asphalt or decomposed granite.
Underground services	▪ Re-route underground services to avoid root zones. ▪ Consolidate utility trenches. ▪ Utilised manual excavation or non-destructive excavation. ▪ Thread conduits under, below, above, or around existing roots.

Construction Impact	Methods to Avoid or Minimise Impact
	▪ Utilise directional drilling or boring to install services. ▪ Trench directly towards the centre of the tree to minimise segmented root loss.

Source: Tree Survey

- Mitigating the impact:
 - Implementation of a tree protection plan.
 - Installation of tree protection fencing, trunk protection and ground protection.
 - Project arborist supervision and monitoring of trees during construction.
- Other key mitigation includes implementation of the:
 - Vegetation Management Plan (refer to **Appendix FF**)
 - Wildlife Management Plan (refer to **Appendix GG**)

The management plans listed can be appropriately conditioned to be implemented for the lifecycle of the project.

6.1.5 Noise and Vibration

The site-specific SEARs include a quantitative noise and vibration impact assessment undertaken by a suitably qualified acoustic consultant in accordance with the relevant Environment Protection Authority guidelines and standards. The assessment is required to identify the impacts associated with construction, operation and traffic generation at noise affected sensitive receivers; details of a noise monitoring survey, background noise levels, noise source inventory and worst case noise scenarios; and a cumulative impact assessment of the impacts from other developments. The assessment is also required to include details and analysis of the effectiveness of proposed management and mitigation measures, and identify the residual noise and vibration anticipated.

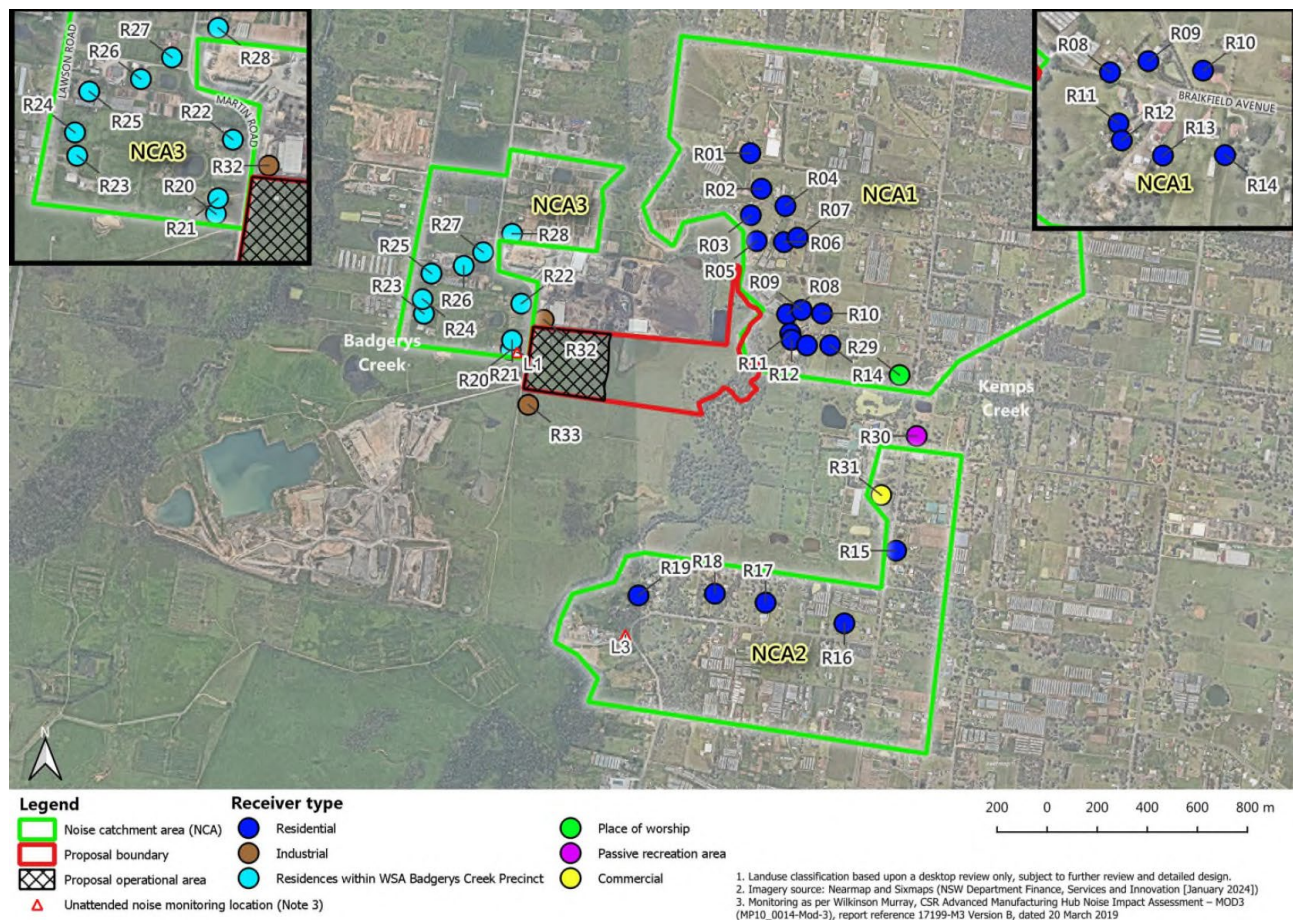
A Noise and Vibration Impact Assessment (**NVIA**) has been prepared by Renzo Tonin & Associates (2026) to address these SEARs and is provided at **Appendix Z**. The assessment considers the potential noise and vibration impacts that may result from the construction and operational phases of the proposed development.

6.1.5.1 Existing environment

Noise levels have been modelled to all nearby and potentially impacted sensitive noise receiver locations. The locations were grouped in noise catchment areas (**NCA**s) based on their similarity in respect to land use criteria. The receiver locations are illustrated within the figure below.

- NCA1: rural residences largely characterised as single or two storey residential dwellings in Kemps Creek. Located to the north-east and east of the site, comprising receivers R1 to R14.
- NCA2: rural residences largely characterised as single or two storey residential dwellings in Kemps Creek. Located to the south and south-east of the site, comprising receivers R15–R19.
- NCA3: rural residences within the WSA Badgerys Creek Precinct, to the west of the proposal. Comprise receivers R20–R28.
- Other receivers: several industrial properties and commercial premises located around the site. They are identified as receivers R31–R33. In addition, a church and a cemetery is also identified, as receiver R29 and R30.

Figure 36 Noise Monitoring Locations and Sensitive Receiver Locations



Source: Renzo Tonin, 2026

Renzo Tonin note, that at the time of reporting, the area surround the Western Sydney Airport within the Badgerys Creek Precinct are in proximity to construction works and as such character of the background noise environment is considered to be potentially atypical. Therefore, the noise assessment (particularly background noise monitoring) undertaken by Wilkinson Murray for MP10_0014-Mod-3 between 16 June 2016 and 29 June 2017 at 217 Martin Road, Badgerys Creek; and 24 July 2017 and 2 August 2017 at 48 Victor Avenue, Kemps Creek was utilised for the proposal.

To inform the baseline data for the proposal, the background and ambient noise levels are outlined in the table below. It completes the assessment at two reference locations considered to be the nearest and most potentially affected locations in the absence of noise from the subject site. The results demonstrate a generally higher measurement of noise levels for the ambient category. In addition, the day periods are clearly measured as louder periods to the evening and night periods at the location on Martin Road. However, the location at Victor Avenue conveys generally consistent noise levels across time periods, with the shoulder time period being measured slightly higher.

Table 23 Measured Existing Background and Ambient Noise Levels, dB(A)

Ref	Address	Rating Background Noise Levels (RBLs), LA90, 15 minute				Ambient Noise Levels, LAeq, 15minute			
		Day ¹	Eve ²	Night ³	Shoulder ⁴	Day ¹	Eve ²	Night ³	Shoulder ⁴
L1	217 Martin Road,	40	35	34	38	50	43	43	47

Ref	Address	Rating Background Noise Levels (RBLs), LA90, 15 minute				Ambient Noise Levels, LAeq, 15minute			
		Day ¹	Eve ²	Night ³	Shoulder ⁴	Day ¹	Eve ²	Night ³	Shoulder ⁴
	Badgerys Creek								
L3	48 Victor Avenue, Kemps Creek	38	38	37	41	47	43	45	47

Notes:

1. Day: 7.00am to 6.00pm Monday to Saturday and 8.00am to 6.00pm Sundays & Public Holidays
2. Evening: 6.00pm to 10.00pm Monday to Sunday & Public Holidays
3. Night: 10.00pm to 5.00am Monday to Sunday & Public Holidays
4. Morning shoulder: 5.00am to 7.00am Monday to Saturday and 5.00am to 8.00am Sundays & Public Holidays

Source: Renzo Tonin, 2024 (adapted from Wilkinson Murray)

6.1.5.2 Potential impacts

Construction Noise

In accordance with the NSW *Interim Construction Noise Guideline* (ICNG, 2009), the project proposes to adopt the following constructions hours as outlined in **Table 24** below.

Table 24 Proposed Construction Hours

Construction Hours	Monday to Friday	Saturday	Sunday / Public Holiday
Recommended Standard Construction Hours			
Standard Hours	7AM to 6PM	8AM to 1PM	No work
Outside Recommended Standard Construction Hours			
Out-of-hours works (day)	N/A	1PM to 6PM	8AM to 6PM
Out-of-hours works (evening)	6PM to 10PM	6PM to 10PM	6PM to 10PM
Out-of-hours works (night)	10PM to 7AM	10PM to 8AM	10PM to 8AM

Source: Renzo Tonin, 2024

The assessment considers the background noise levels against the recommended noise management levels (**NMLs**) for the subject site. In addition, noise levels at different receiver locations will vary depending on the area of construction, type of work and location. Noise emissions were determined by modelling noise sources, receiver locations and operating activities. The worst affected receivers are those with direct interface to the construction area.

The assessment of the predicted noise levels considers the potential construction noise impacts on identified receiver locations. The Noise and Vibration Impact Assessment includes a detailed inventory of construction and operational noise sources and adopts conservative, reasonable worst-case operating scenarios based on measured data from a comparable Metroll facility, established sound power levels and concurrent activity assumptions to ensure potential impacts are not underestimated (refer Appendix E of the NVIA). The results confirm that the majority of predicted noise levels during standard daytime construction hours will comply with the Noise Management Levels (NML) for nearby affected receivers. The exceptions to this include:

- When works are occurring in proximity to residential receivers R20-R22 on Martin Road in NCA03.
- When high noise generating plant and equipment are in use, such as excavators with rockhammer attachments, chainsaws or concrete saws, or when loud equipment is occurring concurrently. However, when works occur at greater distances, the noise levels are expected to be less, and potentially below the NML.
- Noise levels are predicted to be above the NML at the adjacent industrial premise (R32) when works are occurring in close proximity or when loud equipment are occurring concurrently. However, when works occur at greater distances, the noise levels are expected to be less, and potentially below the NML.
- No residential receivers are predicted to be 'highly noise affected during the construction phase.

Overall, the proposed construction phase of the proposal can be appropriately managed to ensure no adverse noise impacts, especially to residential receivers.

Cumulative noise impacts were also considered, given at least seven SSDA's or masterplan proposals have been prepared in proximity to the site. Where construction works, occur concurrently or during a similar timeframe (i.e. within the same week), there is potential for cumulative noise impacts from the Proposal combined with other concurrent construction projects, and so it is recommended that mitigation and management measures are implemented to minimise cumulative impacts. Additional measures are to be used to mitigate and manage cumulative noise impacts, as detailed in the following section.

Cumulative construction and operational noise impacts have been assessed in accordance with the NSW Noise Policy for Industry and the Western Sydney Aerotropolis Development Control Plan. The assessment considers concurrent construction activities, future industrial development within the Badgerys Creek precinct, and spatial separation and concurrency factors to ensure that the proposal's contribution to cumulative noise remains within acceptable limits. In addition, construction related road traffic noise is expected to achieve the requirements of the *NSW Road Noise Policy* and is not expected to cause any adverse impacts at nearby receivers.

6.1.5.3 Construction Noise Mitigation Measures

A range of construction noise mitigation measures were identified to be implemented where required and feasible.

General engineering noise controls:

- Implementation of noise control measures, such as those suggested in Australian Standard 2436-2010 '*Guide to Noise Control on Construction, Demolition and Maintenance Sites*', are expected to reduce predicted construction noise levels.
- The RTA' listed noise reductions are conservatively low and should be referred to in preference to those of AS2436.

Noise management measures:

- Use quieter and less noise/vibration emitting construction methods where feasible and reasonable. Where loud plant and/or equipment are being used in construction works, where feasible and

reasonable the selection of alternative quieter plant and/or equipment should be considered for tasks.

- Plant and equipment must be properly maintained. Provide special attention to the use and maintenance of 'noise control' or 'silencing' kits fitted to machines to ensure they perform as intended.
- Non-tonal reversing beepers (or an equivalent mechanism) must be fitted and used on all construction vehicles and mobile plant regularly used on site and for any out of hours work.
- Loading and unloading of materials/deliveries is to occur as far as possible from sensitive receivers.
- Site sheds to be strategically located to provide shielding to nearby residences.
- Locate laydown and staging areas within the construction area as far from residences as practicably possible.
- Where feasible and reasonable, construction should be carried out during the standard daytime working hours.
- In response to noise complaints, a noise monitoring program should be carried out for the duration of works in accordance with the Construction Noise and Vibration Management Plan (CNVMP) or CEMP and any approval conditions.
- If during construction planning it is identified that some residences could be 'highly noise affected' due to changes to the construction methodologies, respite periods should be considered where feasible and reasonable.

Additional mitigation measures for cumulative noise impacts are outlined below and would be included in the CNVMP or CEMP and detail how these measures would be incorporated during the works.

- Coordinating work between construction sites to manage cumulative noise impacts, where feasible and reasonable. An example would be to ensure that where multiple sites are undertaking noise intensive works, such as demolition works, and these construction works could occur concurrently on multiple construction sites in proximity to the same noise sensitive receivers, these impacts are to be managed with consideration of both projects (ie. ensure that works do not occur during designated respite periods).
- Community consultation to gauge key noise impacts and issues and identify any unknown impacts from concurrent or consecutive sets of constructions works.
- Consideration of cumulative construction noise impacts during the development of noise mitigation and management measures for the worksites, including coordination between construction projects, where reasonable and feasible (ie. consideration of respite periods provided by other projects for approved OOH, so that timetables between projects don't result in other projects or the Proposal impacting the same noise sensitive receivers during designated periods of respite).

6.1.5.4 Vibration

Construction vibration is associated with the following three (3) main sources:

- Disturbance to building occupants: To assess the potential for vibration impact on human comfort, an initial screening test will be done based on peak velocity units.
- Potential damage to buildings: Potential structural damage of buildings as a result vibration is typically managed by ensuring vibration induced into the structure does not exceed certain limits and standards.
- Potential damage to sensitive equipment in a building: Employ guideline values for vibration velocity to be used when evaluating the effects of vibration on buried pipework.

A number of vibration intensive construction activities are likely to be required such as vibratory rollers. No sensitive structures are within the minimum working distance for cosmetic damage during vibratory works. While the offices of the adjacent industrial site fall within the human annoyance minimum working distance. The use of these buildings in the adjacent industrial lot should be confirmed so that the appropriate human annoyance vibration management criterion can be applied for management. A further review of potential vibration impacts and construction methodology, along with mitigation and management approaches to appropriately manage potential impacts would be required during further design development phases to ensure that potential vibration impacts are adequately mitigated and managed.

The nearest sensitive residential receivers are approximately 75 metres away from the site wide construction works. The adjacent industrial receiver is approximately 22 metres away. The construction works could result in vibration intensive works being close to the minimum working distances of the adjacent industrial receiver. As such, management measures and approaches will be employed.

6.1.5.5 Vibration Mitigation Measures

The level of vibration at which people perceive vibration, or at which loose objects may rattle is far lower than vibration levels that can cause damage to structures. At properties near the constructions works, nearby receivers may be able to feel vibration when vibration-generating equipment is being utilised. Accordingly, it is appropriate to identify properties where there is a probability of adverse comment so that impacts can be managed. Therefore, the following mitigation measures are recommended:

- A management procedure should be implemented to deal with vibration complaints.
- Where vibration is found to be excessive, management measures may include:
 - Modification of construction methods such as using smaller equipment,
 - Establishment of safe buffer zones,
 - Time restrictions for the most excessive vibration activities.
- Attended vibration measurements for human annoyance should be carried out as required to appropriately manage the works.
- Notification by letterbox drop should be carried out for all buildings in the vicinity of the construction site.
- Implementation of community consultation measures, including direct consultation with potentially impacts receiver locations.
- Establishment of a complaints register.

6.1.5.6 Operational Noise Impacts

In relation to operational noise, the assessment undertaken by Renzo Tonin included two (2) components:

- Controlling intrusive noise impacts in the short-term for residences; and
- Maintaining noise level amenity for residences and other land uses.

6.1.5.7 Road Traffic Noise

Heavy vehicle movements for operational traffic to and from the site will be from Martin Road and then connecting to nearby major arterial roads. The following routes are expected to be utilised during the operational phases:

- Departing the site / travel to the site from the M4 Motorway via The Northern Road; and
- Departing the site / travel to the site from Elizabeth Drive / M7 Motorway or future M12 Motorway.

Road traffic noise impacts from the proposal onto Elizabeth Drive has been considered by the Elizabeth Drive upgrade project, which will consider the future growth of the area due to the WSA and surrounding industry.

6.1.5.8 Operational Noise (On-site)

The noise sources associated with the future operations have been separated into the following categories:

- Trucks arriving and departing the site
- Truck movements within the facility and hardstand areas
- Loading dock receiving and dispatching activities
- Internal warehouse activities
- Passenger vehicle movements and car parking
- Office related activities

The assessment undertaken has assumed that the future facilities will not include temperature-controlled activities. Given the proposal includes provision for 24/7 operations, there is potential for sleep disturbance noise impacts to occur from high noise associated activities within the facilities (e.g. airbrakes and goods handling).

Accordingly, each of the assessment scenarios have assessed the reasonable worst-case operating scenarios that could take place. Importantly, where all the assumed activities do not occur simultaneously during the same 15-minute period, the noise levels are likely to be lower than those predicted.

Operational noise contour mapping has been prepared as part of the Noise and Vibration Impact Assessment to illustrate predicted operational noise levels across the site and surrounding receivers under reasonable worst-case operating scenarios. Noise contour maps prepared at 1.5 metres above ground level in accordance with the NSW Noise Policy for Industry are provided in Appendix F of the NVIA.

The contours demonstrate that, following implementation of the recommended mitigation measures, operational noise levels comply with the applicable project noise trigger levels for residential receivers in NCA01 and NCA02, with residual exceedances limited to a small number of receivers within NCA03 in the Western Sydney Aerotropolis Badgerys Creek precinct.

Planned management and mitigation measures are proposed to combat potentially adverse acoustic impacts. These feasible and reasonable measures are outlined in the section below; however, have been implemented for the purposes of the assessment outlined below.

Noting that the proposal includes provision for a speculative component / warehouse, the following observations are noted which will impact upon the best achievable noise levels:

- As the future tenants of Warehouse 2 are not known, the final operations and noise sources / noise emissions can only be conceptually predicted as a worst-case scenario.
- As a contractor has not yet been appointed, plant and equipment selections will be determined during the detailed design phase.

The predicted operational noise level results show that through the implementation of the identified mitigation measures, the project noise levels are achieved for all receivers in NCA1 and NCA2 for existing residential receivers. For NCA03, which comprises residences in the Badgerys Creek Precinct that has been rezoned to Enterprise, there are residual noise levels that remain over the project specific noise trigger levels.

Sleep disturbance impacts were assessed and looked at maximum noise level events associated with on-site activities that could cause high noise events, such as truck activities, loading dock, hardstand activities and warehouse activities to determine their potential to cause sleep disturbance at nearby residential

receivers. During the night-time and morning shoulder periods, sources of high noise events are predicted to exceed the screening level and 'awakening reaction' at receivers in the WSA Badgerys Creek precinct (NCA03). The results demonstrate:

- Noise events at R20 – R22 could be up to 12–20 dB(A) above the night-time screening level, and could also be above the awakening reaction level of 65 dB(A) L_{Amax}.
- Noise events at R23, R24 and R26 could up to 4 dB(A) above the night-time screening level, and below the awakening reaction level of 65 dB(A) L_{Amax}.
- Similar outcomes to the above are expected during the morning shoulder, as there is only 1 dB(A) difference in the applicable screening criteria.

The sleep disturbance assessment confirms that predicted maximum noise level events comply with the applicable screening and awakening reaction criteria for all residential receivers in NCA01 and NCA02.

For a limited number of existing residences within NCA03 in the Western Sydney Aerotropolis Badgerys Creek precinct, maximum noise level events are predicted to exceed the awakening reaction criterion during the night-time and morning shoulder periods. These receivers are located within land zoned for future enterprise development and are expected to be transitional in nature. Feasible and reasonable mitigation and management measures are proposed to manage these short-term impacts.

6.1.5.9 Residual Noise and Vibration Impacts

Following the application of all feasible and reasonable mitigation measures identified in the Noise and Vibration Impact Assessment, construction noise impacts are expected to generally comply with the applicable Noise Management Levels, with no residential receivers predicted to be highly noise affected.

For operational noise, compliance with project noise trigger levels is achieved for all residential receivers in NCA01 and NCA02. Residual exceedances are predicted at a small number of existing residences within NCA03, which are located in land zoned for future enterprise development. These residual impacts have been assessed as manageable through operational controls, monitoring and, where required, negotiated at-property mitigation measures, consistent with the Noise Policy for Industry.

6.1.5.10 Operational Noise Mitigation Measures

The future Operational Noise Management Plan (ONMP) should include the following provisions:

- The *Noise Policy for Industry* (NPfI) includes provision for the implementation of 'best management practice (BMP) which pertains to the adoption of operational procedures that minimise noise while retaining productive efficiency. Examples of BMP that could be adopted for the proposal include:
 - Reducing peak 15-minute heavy vehicle movements across the site by staggering delivery / arrival / departure times during sensitive time periods (i.e. night).
 - Minimising concurrent use of mobile plant near hardstand openings (i.e. ground floor exit) and / or limiting their use to the less sensitive daytime and evening periods.
 - Minimising use of reversing alarms by providing forward manoeuvring where practicable.
 - Switching vehicles and plant off when not in use.
 - Keeping equipment well-maintained and operating it in a proper and efficient manner.
 - Training staff and drivers on the effects of noise and the use of quiet work practices (e.g. informing drivers of the noise impacts from the sudden braking or accelerating, bangs and clangs, etc.).
- Best Available Technology Economically Achievable (BATEA):
 - The use of quieter mobile plant, such as electric forklifts instead of gas-powered forklifts.
 - Using equipment with efficient muffler design.

- Fitting and maintaining noise reduction packages on plant and equipment.
- Ensure hardstand surfaces, roadways and vehicular access points are smooth as to not result in jolting of the truck (i.e. at the entrance to the site).
- Noise compliance monitoring.
- On-site tenancy management.
 - On-site design mitigation measures, as outlined in Table 6-10 of the NVIA, include a perimeter noise barrier along the eastern border. This barrier should be at least 6 metres above the hardstand level of Warehouse 1 and 5 metres above the hardstand level of Warehouse 2. This will effectively shield the hardstands and the truck entry/exit roads from the line of sight.
 - Temporary noise barriers, 6 metres high, should be installed from the south-western corner of the warehouse to the exit road gatehouse if needed during construction.

Noise and vibration monitoring will be undertaken during construction and operation of the proposal, as recommended in the Noise and Vibration Impact Assessment. During construction, attended noise and vibration monitoring may be carried out in response to complaints or where works occur close to sensitive receivers, in accordance with the future Construction Noise and Vibration Management Plan.

Following commencement of operations, operational noise compliance monitoring is recommended to be undertaken to verify noise emissions against the assessment predictions, in accordance with Section 7 of the NSW Noise Policy for Industry and the Approved Methods. A formal noise and vibration complaints management procedure will be implemented. An outline of this proposed procedure including a complaint management form is included in Appendix G of the NVIA.

6.1.6 Water Management

The Site-specific SEARs state the applicant must provide an integrated water management strategy, which includes:

- an assessment of potential surface and groundwater impacts associated with the development, including potential impacts on watercourses (Wianamatta – South Creek), key fish habitat and recreational fishing, groundwater, and groundwater dependent communities nearby.
- a detailed site water balance including a description of potable and non-potable water demands and breakdown of water supplies, and any water licensing requirements.
- details of the proposed stormwater/wastewater drainage design including the capacity of onsite detention system(s), onsite sewage management and measures to treat, reuse or dispose of water, consistent with the requirements of the Phase 2 Aerotropolis Development Control Plan and the Blue Green Infrastructure framework of the Western Sydney Aerotropolis Precinct Plan.
- details of how the proposed stormwater drainage system will connect to Sydney Water's regional stormwater system, including details of any interim solution, consistent with the Department's 'Technical guidance for achieving Wianamatta (South) Creek stormwater management targets' (2022) for both construction and operational phases
- description of the measures to minimise water use.
- characterisation of water quality at the point of discharge to surface and/or groundwater against relevant water quality criteria.
- where water and drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards, the local council or other drainage or water authority.
- details of any surface or groundwater monitoring activities and methodologies.

A Civil Infrastructure Report (**Appendix P**) has been prepared by Arcadis. The report outlines the integrated surface water, stormwater, water supply and wastewater strategy required by the SEARs. The report also provides the criteria adopted for the engineering and design of all civil infrastructure components of the development and demonstrates compliance with the relevant controls set out within the WSADCP 2022. The infrastructure works will include stormwater infrastructure including On-site Stormwater Detention (OSD) and Water Sensitive Urban Design (WSUD). Bulk earthworks and the utilities installation and augmentation are proposed.

In addition, a Groundwater Impact Assessment (**GIA**) (**Appendix W**) has been prepared to specifically addresses groundwater conditions, dewatering impacts, impacts to groundwater dependent ecosystems and compliance with the NSW Aquifer Interference Policy associated with the development.

Together, the Civil Infrastructure Report and the Groundwater Impact Assessment collectively constitute the integrated water management strategy for the development, addressing stormwater, water supply, wastewater and groundwater in a coordinated manner.

6.1.6.1 Existing environment

Stormwater Runoff

The site's existing topography falls from west to east with grades ranging between 1% and 5%. Bulk earthworks are proposed as part of the development to achieve two suitably flat pads for the proposed warehouses, allow for compliant vehicular access from Martin Road and to provide the required floor immunity.

Existing runoff drains across the site via vegetated natural channels. The western catchment of the site generally falls towards the existing dam located within the ENZ part of the site. The dam discharges via a spillway to South Creek.

The eastern catchment of the site also discharges to South Creek.

The site is impacted by overland flow from an external upstream catchment of approximately 25.8ha. Runoff from this catchment is intercepted in the north-west corner of the site via an open channel that carries flows along the northern boundary to South Creek.

Groundwater

The site and surrounding area is classed as a less productive groundwater source under the NSW Aquifer Interference Policy. A less productive groundwater source is defined as having total dissolved solids greater than 1,500 milligrams per litre or does not contain water supply works that can yield water at a rate greater than five litres per second.

No registered groundwater bores were identified within the site. A total of nine groundwater bores are located within 2km of the Site, all of which are more than 800 metres from the site boundaries.

Three groundwater monitoring wells were installed at the site in May 2023 to a maximum depth of 8.5 metres below ground level. The maximum groundwater elevation across the Site in the most recent monitoring period was 48.79m AHD and regional groundwater was expected to follow surface gradients towards South Creek (east to north).

No groundwater dependant ecosystems were identified within the ENT zoned part of the site identified in the GIA as the 'Assessment Area'. Two 'high potential' groundwater dependant ecosystems are located in the residual part of the site. Three other groundwater dependant ecosystems (ranging from low to high potential) are located within 1km of the site.

Existing Hydrolines and Watercourses

As shown in **Figure 37** overleaf a mapped first order (Strahler Order 1) hydroline is identified on land immediately north of the site. This hydroline serves a catchment greater than 15ha and as such will ultimately form part of the broader regional stormwater naturalised trunk drainage network to be delivered by Sydney Water.

Review of available aerial imagery indicates that the mapped hydroline currently traverses areas that are built upon and does not appear to exist as a continuous, clearly defined watercourse. Wianamatta Creek runs along the site boundary to the east

Notwithstanding the presence of the mapped hydroline and irrespective of whether the land could be considered waterfront land, the proposed development at 230 Martin Road is State Significant Development. Accordingly, a controlled activity approval under the Water Management Act 2000 is not required, pursuant to section 4.41(1)(g) of the Environmental Planning and Assessment Act 1979. Notwithstanding the statutory exemption, the proposed stormwater strategy has been designed to protect downstream watercourses and achieve the relevant water quality and quantity objectives.

Figure 37 Mapped Hydroline



Source; Hydroline Spatial Mapping (2026)

6.1.6.2 Groundwater Impacts and Mitigation

A conceptual model has been prepared by EP Risk (2024) to inform the groundwater dewatering analysis and impact assessments. Three groundwater monitoring wells were installed on-site in May 2023 to characterise baseline groundwater conditions. Based on the findings of the Groundwater Impact Assessment, ongoing groundwater or surface water monitoring is not required during operation, as impacts are predicted to be negligible.

Construction Phase (Groundwater)

The proposed warehouses and car parks are located above the groundwater level at the site. Accordingly, dewatering is only expected to be required for the installation of deep services and utilities. Based upon the proposed cut and fill, groundwater is expected to be encountered in the proposed bioretention basin in the north eastern part of the ENT zoned land.

The results of the calculations indicate approximately 11.85 ML of dewatering will be required during construction works. The maximum anticipated radius of influence is anticipated to be 116 metres from the edge of the excavation.

Given that the closest water supply works are more than 800m from the site, the constructions works will not result in any impacts to a water supply work. Additionally, there are no high priority culturally significant sites listed in the Water Sharing Plan for the Southern Sydney River Groundwater Sources and the proposal will not impact any culturally significant site. Construction works are also not expected to adversely impact

any groundwater dependent ecosystems, the nearest of which is approximately 480 metres east of the proposed dewatering activities.

Overall, the construction works will not result in a decline in groundwater pressure or groundwater head at any water supply works or high priority groundwater dependant ecosystems and will not alter the beneficial use of the groundwater. Accordingly, the proposed impact will be less than the Level 1 minimal impact considerations set out in the NSW Aquifer Interference Policy and is therefore acceptable.

Notwithstanding, potential impacts on groundwater and surface water quality may arise from the construction works. These impacts could potentially include:

- Increased sedimentation in downstream waterways as a result of erosion created by construction activities
- Contamination of waterways or groundwater as a result of chemical or hydrocarbon spills.
- Pollution of receiving drainage networks and watercourses as a result of discharge of excess groundwater.
- Without mitigation, these represent a moderate impact to groundwater.

Operational Phase (Groundwater)

- Given that the proposed warehouses will be located within a small part of the site and runoff from hardstand areas will continue to flow east towards South Creek, the development is likely to have a negligible effect on flows available to groundwater receptors in the area.
- Due to the lack of long-term interaction of the proposed development with groundwater, no long-term impact on groundwater level is anticipated. Additionally, the proposed development is not predicted to result in any long-term impact on groundwater quality.
- Accordingly, it is predicted that groundwater impacts arising from the operational phase of the development would be less than the Level 1 minimal impact considerations specified in the NSW Aquifer Interference Policy and are therefore acceptable.

Mitigation Measures (Groundwater)

The following mitigation measures will be implemented to minimise impacts of the proposed development on groundwater:

- Construction phase
 - Any hazardous materials and refuelling will be undertaken in bunded areas. Spill kits will be kept on site and staff informed of how to use them in an incident.
 - Where possible, extracted water will be used for dust suppression on site. Approval for treatment and disposal to sewer / stormwater will be obtained if large volumes of groundwater is required to be dewatered
 - A soil and water management plan will be prepared and implemented to minimise impacts arising from construction works to water quality. The plan will be prepared in accordance with best practice and measures in accordance with the 'Blue Book'.
 - Alternative technologies such as under-boring will be considered and implemented (where practical) to minimise the time excavations are left open and the size of excavations. Where possible, excavations will be sited away from groundwater receptors.
 - All hazardous goods and re-fuelling activities are to be undertaken in bunded areas.
 - Monitoring and adaptive management during construction will be implemented through the Construction Environmental Management Plan and Soil and Water Management Plan should unexpected groundwater inflows or water quality issues arise.
- Operational phase

- Water sensitive urban design measures are to be implemented as detailed above.
- Gypsum stabilisation of site won material reused as general fill will be considered.

Accordingly, groundwater impacts associated with both construction and operation are predicted to be minimal, temporary and acceptable, and are consistent with the Level 1 minimal impact considerations under the NSW Aquifer Interference Policy..

6.1.6.3 Surface and Stormwater Impacts and Mitigation

Erosion and sediment created during construction works has the potential to adversely impact the health of nearby waterways (e.g. South Creek). No direct works are proposed within Wianamatta–South Creek.

Post-development stormwater flows will be managed to ensure that peak discharge rates do not exceed pre-development conditions and that water quality meets the Western Sydney Aerotropolis DCP targets prior to discharge. With the implementation of erosion and sediment controls during construction and Water Sensitive Urban Design measures during operation, the proposal is not expected to result in adverse impacts on downstream aquatic habitat, key fish habitat or recreational fishing values within South Creek. Accordingly, mitigation measures will be implemented to minimise these potential impacts as far as possible.

A stormwater drainage network is proposed to manage post-development flows leaving the site. The stormwater drainage system incorporates On Site Detention (OSD) to limit post-development peak flows to pre-development peak flow rates – ensuring no adverse flooding impacts downstream of the development.

Wastewater generated by the development will be managed via connection to Sydney Water’s future South Creek wastewater trunk network, which is planned for delivery between 2026 and 2028. If the trunk network is not available at the time of occupation, interim on-site septic tanks will be utilised, with periodic pump-out, until connection to the Sydney Water system is available. No permanent on-site sewage treatment is proposed.

The proposed stormwater pit and pipe network will convey flows safely in the minor (5% Annual Exceedance Probability (AEP)) and major (1%) flood events. All runoff from the development via the proposed network will be directed to an OSD tank located beneath the hardstand area to the east of Warehouse 1 (the northern warehouse). Discharge from the OSD tank will be directed to a bioretention basin that will outlet to the existing pond in the ENZ area. No changes are proposed to the spillway of the existing dam that directs flows to South Creek. However, it is noted that this is an interim approach with the dam ultimately forming part of Sydney Water’s regional stormwater infrastructure as discussed in more detail below.

Twin 1,200mm diameter stormwater pipes are proposed to convey the external catchment overland flow through the proposed development to the ENZ zoned land. Flows from the external catchment will bypass the proposed OSD tank and bioretention basis and will not be retained or treated.

Water Quality and Quantity

The proposed development has adopted the operational phase Annual Load Reduction water quality targets set out in the WSADCP 2022. These include:

- Gross pollutants: 90% reduction in the average annual load
- Total Suspended Solids (TSS): 90% reduction in the average annual load
- Total Phosphorous (TP): 80% reduction in the average annual load

The proposal has also adopted the operational phase Mean Annual Runoff targets from the WSA DCP 2022 in relation to water quantity, which include:

- Mean Annual Runoff Volume (MARV): ≤ 2 ML/ha/y at the point of discharge to the local waterway
- 90th percentile flow: 1,000–5,000 L/ha/day at the point of discharge to the local waterway

- 50th percentile flow: 5-100 L/ha/day at the point of discharge to the local waterway
- 10th percentile flow: 0 L/ha/day at the point of discharge to the local waterway

The proposed development utilises a treatment train approach to treat stormwater conveyed by the upstream piped network prior to discharging to the existing dam within the ENZ area. The treatment measures have been sized to treat the catchment area of the development and achieve the required water quality targets.

The proposed treatment train will comprise:

- Rainwater tanks (for non-potable reuse) – the tanks will collect roof water to meet more than 80% of the development's demand for non-potable water (toilet flushing and landscape irrigation). Five rainwater tanks are proposed. It is anticipated that these five tanks will supply 84.4% of the non-potable water demand. The tanks will also reduce the total volume of runoff discharging from the development.
- Gully Pit Baskets – The primary stormwater treatment to capture litter, debris and coarse sediment. OceanGuard gully pit baskets are proposed in every inlet pit within the development.
- Stormfilters – 44 Proprietary Ocean Protect filtration cartridges will be installed within the proposed OSD tank to contribute to the removal of suspended solids, phosphorus, and nitrogen.
- Filterra basin – The basin will have a filter media area of 306m², filter depth of 530mm and an extended detention depth of 150mm. The basin will contribute to the removal of suspended solids, phosphorous and nitrogen.
- On Site Detention (OSD) – OSD tanks will attenuate peak flows (limiting post-development peak flows to pre-development peak flow rates). OSD Tank A will have an area of 1,250m² with a minimum detention volume of 3,225m³, and OSD Tank B will have an area of 130m² with a minimum detention volume of 346m³.

MUSIC modelling has been undertaken to assess the proposal's compliance with the water quality and water quantity targets. The results do not consider the ENZ zoned land located downstream of the proposed main development area. The results indicate that the proposed treatment measures are sufficient to meet the water quality targets. The modelling confirms that treated stormwater meets the applicable Western Sydney Aerotropolis DCP and Wianamatta–South Creek water quality and quantity targets at the point of discharge prior to entering the ENZ and downstream South Creek system.

Table 25 Music modelling water quality results

POLLUTANT	GP	TSS	TP	TN
Source Loads without treatment (kg/yr)	1,190	7,400	14.8	95.6
Target reduction required (%)	90	90	80	65
Residual Load Modelled with proposed treatment train	0	318	3	33.7
Total reduction modelled	100	96	80	65

The MUSIC modelling has also considered the proposed development's compliance with the Water Quality targets. The assessment considered the entire site, including the ENZ zoned land, and included assumptions regarding the initial and permanent pool volume of the dam and its extended depth. The results are copied in the table below and demonstrate that treated stormwater meets the applicable Western Sydney Aerotropolis DCP targets and provides an appropriate level of protection for downstream receiving waters within Wianamatta–South Creek.

Table 26 Music modelling water quality results

Indices	Target Required	Modelled Result
MARV (ML/ha/yr)	≤ 2	1.28
90th Percentile (L/ha/day)	1,000 – 5,000	1,529
50th Percentile (L/ha/day)	5 to 100	14
10th Percentile (L/ha/day)	0	0

Source: Arcadis

DRAINS modelling was used to assess the pre-development and post-development peak flow rates for the developed catchment that will drain to the proposed OSD tanks. As shown in the table below, the post-development peak flow rate is less than the pre-development peak flow rate for each design storm event.

Table 27 Music modelling water quantity results

AEP	OSD Tank A		OSD Tank B	
	Pre-development peak flow rate (m ³ /s)	Post- development peak flow rate (m ³ /s)	Pre-development peak flow rate (m ³ /s)	Post- development peak flow rate (m ³ /s)
63.21%	0.109	0.105	0.017	0.016
50%	0.138	0.113	0.021	0.018
20%	0.322	0.293	0.050	0.049
10%	0.452	0.384	0.076	0.064
5%	0.566	0.484	0.098	0.096
2%	0.790	0.711	0.129	0.124
1%	0.955	0.823	0.160	0.144

Source: Arcadis

An inspection and maintenance plan will be developed for the proposed stormwater infrastructure prior to the issue of the relevant construction certificate.

It is noted that the Precincts SEPP and the Precinct Plan includes an area to be acquired for regional stormwater infrastructure. This area is located on the ENZ part of the site. The proposed stormwater management measures have been designed to ensure that the development can achieve the required water quality and water quantity targets without relying on future Sydney Water regional stormwater infrastructure.

In the interim period, flows from the bioretention basin will discharge to the existing dam in the ENZ area. Once operational, the regional stormwater infrastructure will receive flows from the development's bioretention basin (subject to approval).

Erosion and Sediment Control

The following mitigation measures will be implemented to minimise adverse construction impacts:

- A Soil and Water Management Plan (SWMP) will be prepared for the proposed development. The SWMP will include Erosion and Sediment Control measures.
- Erosion and sediment control measures to be incorporated into the SWMP may include clean water channels, dirty water channels, a sediment basin, sediment fences and stabilised site access.
- The contractor will minimise the extent of disturbed area on site at any one time and undertake stabilisation of disturbed areas or previously completed earthworks as necessary.

6.1.6.4 Aerotropolis Regional Stormwater Scheme

Stormwater servicing for the site will be delivered through an interim and an ultimate arrangement consistent with the Western Sydney Aerotropolis Precinct Plan and Sydney Water's regional stormwater strategy.

In the interim scenario, treated stormwater from the development will discharge from the Filterra basin to the existing pond within the ENZ area, with no modification to the existing spillway to South Creek. The interim stormwater arrangement has been designed to achieve full compliance with the Wianamatta–South Creek water quality and quantity targets independently of the future Sydney Water regional stormwater infrastructure.

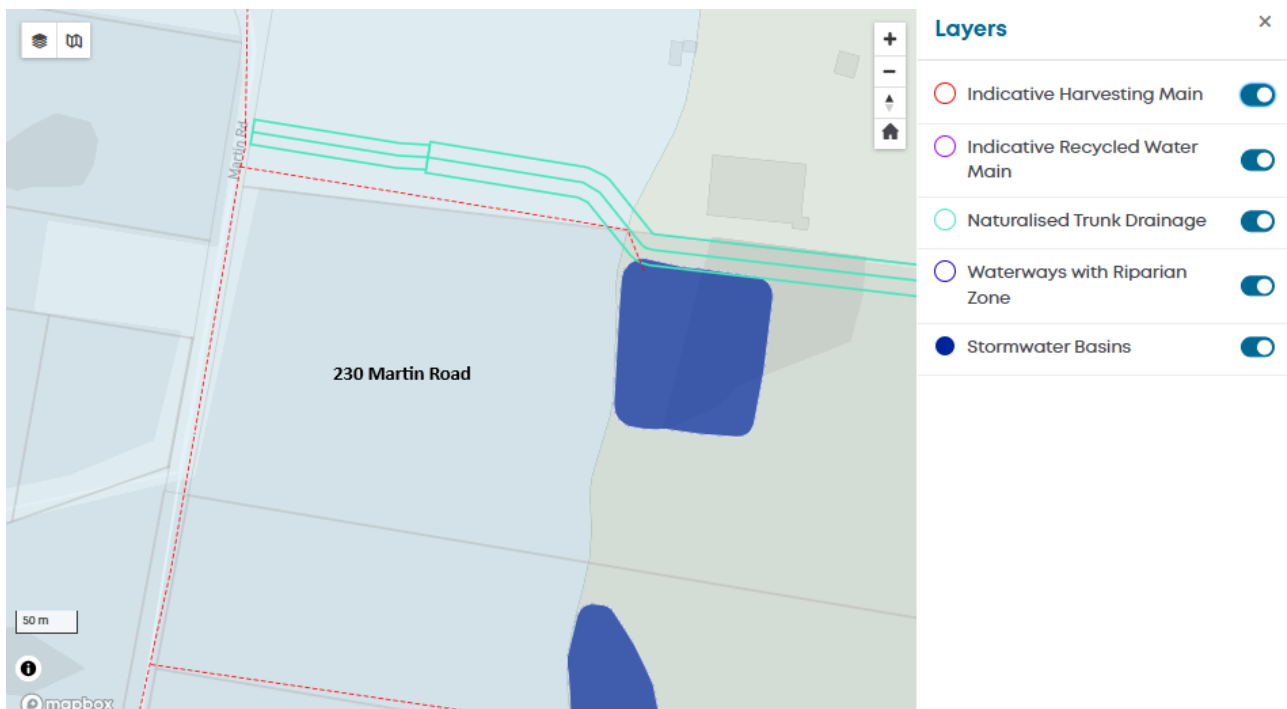
In the ultimate scenario, once Sydney Water's regional trunk drainage, harvesting mains and stormwater basin are operational, flows from the development will connect to and be managed by the regional stormwater system, subject to Sydney Water approval.

As illustrated in **Figure 38** overleaf the finalised Sydney Water scheme plans confirm that the existing first order hydroline identified to the north of the site will be realigned further north as a naturalised trunk drainage channel to accommodate future stormwater harvesting mains and Riparian Street road reserve wholly on the adjacent landholding. This realignment is consistent with the Aerotropolis DCP provisions for Strahler Order 1 streams. This future trunk drainage channel and harvesting mains will connect to the future stormwater basin to be located on the subject site.

Sydney Water will be responsible for the delivery and management of regional stormwater infrastructure (trunk drainage, harvesting mains and stormwater basins), while Council will be responsible for delivery of the future Riparian Street road reserve under its existing contributions framework. All on-site stormwater infrastructure associated with the development will be privately owned and maintained by the proponent. Regional stormwater infrastructure, including trunk drainage, harvesting mains and basins, will be delivered and managed by Sydney Water, with the future Riparian Street delivered by Council under its contributions framework.

Whilst this SSD does not propose to deliver the regional infrastructure, the project team is actively working with Sydney Water in relation to the design and delivery of the regional stormwater infrastructure identified for this site. The applicant is committed to these ongoing discussions with Sydney Water noting that the stormwater strategy for this site could be refined through the RTS process.

Figure 38 Sydney Water scheme (finalised March 2026)



Source: Sydney Water (2026)

6.1.6.5 Site Water Balance and Water Supply

A detailed site water balance has been prepared as part of the Civil Infrastructure Report (Appendix P). Potable water demand for the development is estimated at approximately 78 kL/day, based on Sydney Water demand rates for warehouse and office uses. Potable water will be supplied via Sydney Water's trunk and reticulated drinking water network, subject to delivery of precinct infrastructure.

Non-potable water demand, including toilet flushing and landscape irrigation, will be primarily supplied by on-site rainwater harvesting. Five rainwater tanks (27 kL each) have been sized to supply at least 80% of the non-potable water demand, with MUSIC modelling indicating that up to 89% of non-potable demand can be met.

The proposal does not involve permanent extraction of groundwater or surface water and therefore does not require a water access licence. Construction dewatering volumes are below licencing thresholds and are acceptable under the NSW Aquifer Interference Policy.

Water use minimisation measures will include the installation of water-efficient fixtures and appliances and adoption of operational water efficiency practices, consistent with Sydney Water guidance and the Western Sydney Aerotropolis DCP.

6.1.7 Flooding

The site-specific SEARs state the applicant must prepare a detailed flood risk assessment that satisfies the objectives and provisions contained within the Aerotropolis Phase 2 DCP and includes consideration of:

- the relevant provisions of the NSW Floodplain Development Manual (2023), including the Flood Impact and Risk Assessment Flood Risk Management Guide (LU01) (DPE, 2022).
- flood risk and flood evacuation for the full range of floods up to and including a probable maximum flood.
- demonstration that the proposed 'Park Edge Street' is located outside the 1% Annual Exceedance Probability flood extent.

A *Flood Impact and Risk Assessment* has been prepared by Worley Consulting and is enclosed in **Appendix U**. Given the site's proximity to the Wianamatta-South Creek floodplain, Worley Consulting considered the proposed development in relation to potential flood affectations; flood behaviours; and pre-and-post development scenarios pertaining to flooding as a result of the proposal. The Flood Impact and Risk Assessment has been undertaken in accordance with the NSW Flood Risk Management Manual (2023) and the Flood Impact and Risk Assessment Flood Risk Management Guide (LU01) (DPE, 2022). The assessment adopts a risk-based floodplain management framework, considering flood behaviour, flood hazard, hydraulic categorisation, risk to people and property, and emergency response requirements for the full range of flood events up to and including the Probable Maximum Flood (PMF).

6.1.7.1 Existing environment

South Creek is a major tributary of the Hawkesbury River and flows past the site from south-to-north. The South Creek catchment area upstream from the development site is approximately 90 km². The site is located in close proximity to Wianamatta-South Creek, with the watercourse flowing north to south along the eastern boundary of the site. During adverse flooding events, there is potential for floodwaters to break the banks leading to inundation across the floodplain and the site.

Worley Consulting note that flood modelling for the Wianamatta-South Creek has most recently been undertaken for Infrastructure NSW (INSW) as part of the *Wianamatta South Creek Catchment Flood Study – Existing Conditions (Advisian, Rev 1 – 2022)*. The modelling predicts that the eastern part of the site would experience widespread inundation during floods as frequent as the 5% Annual Exceedance Probability (AEP) event. Accordingly, the flood study referenced was adopted by Worley Consulting for the purposes of assessing the proposed development in relation to flooding.

Table 28 outlined below considers the site's existing conditions pertaining to peak flood levels.

Table 28 Predicted Variation in Flood Levels Across the Development Site – Existing Conditions

Design Event (AEP)	Minimum Flood Level (mAHD)	Maximum Flood Level (mAHD)
5%	46.37	47.12
1%	46.65	47.43
1-in-500	46.90	47.71
Probable Maximum Flood (PMF)	47.76	48.75

Source: Worley Consulting

6.1.7.2 Potential Impacts

Flood Behaviour – Post-Development

The predicted impacts of the proposed development on peak flood levels (utilising a post-development model – RMA-2 model) are summarised below for the 5%, 1% and 1-in-500 year flood events, as well as the PMF:

- **5% AEP:** No changes to peak flows during 5% AEP flood levels within or outside of the development site.
- **1% AEP:** Maximum change in the peak 1% AEP flood extent of 0.01 m outside of the site. The impact is very localised extending less than 15 m into the southern property boundary.
- **1-in-500-year:** Maximum change in the peak flood level of 0.02 m outside of the site.

- **PMF:** Maximum change during the PMF is assumed to be 0.06 m. The impact occurs to the south of the development site.

The flood modelling maps are located with Appendix A and C of the Flood Report in **Appendix U**. Worley Consulting confirm that the predicted impacts are considered negligible during floods up to and including the 1-in-500-year AEP event, being only 0.02 m or less in offsite areas. Consistent with the Aerotropolis Phase 2 DCP, the 1-in-500 AEP event has been adopted as a proxy for assessing potential climate change impacts on the 1% AEP flood event. Further, Worley Consulting note that the impacts predicted during the PMF are considered acceptable based on the extreme nature of such flooding which has an annual exceedance probability of at least 1 in 10,000. Accordingly, based on the predictions, there is not expected to be any impacts on existing emergency response considerations.

In relation to peak flow velocities, the impacts predicted upstream of the development site occur across areas designated as flood fringe and flood storage. The minor velocity increases of up to 0.08 m/s during these events will therefore result in post-development velocities of less than 0.5 m/s, which remain low and will not have the potential to increase the existing flood hazard classification or cause any scour / erosion.

Noting the avoidance of earthworks within the critical flood storage area on-site, the proposal will not impact on the critical storage of the floodplain. Albeit some minor encroachment in the general flood storage area for South Creek; however, the encroachment will not result in any adverse impacts in terms of flood characteristics.

Flood Risk

In accordance with the requirements of the WSADCP, Worley Consulting have considered the following:

- Vehicular and pedestrian access ensures access / egress is provided to above the predicted peak level of the PMF.
- The development can be undertaken consistent with the local flood plan or SES flood emergency strategy for the area.
 - The flood modelling demonstrates that the proposed development footprint, including buildings, hardstand areas and access within the site, remains flood-free during events up to and including the PMF. Flood hazard classifications across the developed portion of the site are low, and the development avoids the South Creek floodway and Critical Flood Storage areas. Flood hazard mapping undertaken as part of the Flood Impact and Risk Assessment indicates that the developable portion of the site is generally subject to low to moderate flood hazard categories (H1–H4), with higher hazard areas (H5–H6) confined to land closer to Wianamatta–South Creek outside the development footprint. Residual flood risk to people is therefore considered acceptable and manageable.
 - While external road networks, including Elizabeth Drive, may be subject to temporary inundation during larger flood events, workers and visitors could still be affected by flooding due to inundation of roads leading to and from the site. The Flood Impact and Risk Assessment confirms that any period of isolation would be limited, generally less than six hours during the Probable Maximum Flood (PMF). Although there is a lack of flood warning due to the absence of suitable upstream river gauges, this is not expected to be a major concern given the availability of flood-free refuge within the development and access to land above the PMF at the site and areas immediately west. Accordingly, a shelter-in-place response is considered appropriate during extreme flood events, consistent with the Liverpool City Flood Emergency Sub Plan and without increasing demand on NSW State Emergency Service resources. Notwithstanding, it is recommended that a Flood Emergency Response Plan be prepared prior to the issue of a relevant Occupation Certificate.
 - The assessment undertaken by Worley Consulting demonstrates that the proposal is capable of satisfying the requirements of the SEARs and DCP provisions. Accordingly, the proposal will have a minimal impact on the predicted flood behaviour for floods up to and including the PMF.

Possible Future Park Edge Street

As noted throughout the EIS whilst a corridor for the future Park Edge Street has been provided within the ENT zone immediately east of the development footprint, is not included within the scope of SSD. For the purposes of flood modelling undertaken as part of this application, the Park Edge Street has been assumed to remain at existing ground levels. Flood mapping indicates that this area may be subject to inundation during 5% and 1% AEP events. Detailed design of Park Edge Street, including confirmation of finished levels and compliance with the requirement to locate the road outside the 1% AEP flood extent, will be addressed as part of the future delivery and approval of that infrastructure.

6.1.8 Air Quality

The site-specific SEARs state the applicant must provide an air quality impact assessment prepared in accordance with the NSW EPA guidelines, including:

- identification of significant air emission sources at the proposed development during construction and operation.
- an assessment of the potential for adverse off-site air quality impacts.
- details of proposed management and mitigation measures.

An Air Quality Impact Assessment (AQIA) has been prepared by Northstar (2026) and is located at **Appendix I**. The assessment has been undertaken in accordance with the NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants in NSW. The AQIA identifies the principal air emission sources associated with the proposal during both construction and operation (Section 2.3), quantitatively assesses the potential for off-site air quality impacts, including cumulative impacts (Sections 6 and 7), and identifies appropriate mitigation and management measures (Section 8). On this basis, the proposal satisfies the site-specific SEARs for air quality.

6.1.8.1 Existing Environment

The surrounding receptors utilised to inform the AQIA are identified in the table outlined below and the figure overleaf.

Table 29 Receptor Locations

ID	Location	Land Use	Coordinates (UTM)	
			mE	mS
R1	Martin Road, Badgerys Creek	Residential	292,969	6,247,571
R2	Martin Road, Badgerys Creek	Residential	293,018	6,247,719
R3	Martin Road, Badgerys Creek	Industrial	293,116	6,247,821
R4	Turnbull Avenue, Kemps Creek	Residential	293,975	6,247,972
R5	Braikfield Avenue, Kemps Creek	Residential	294,091	6,247,702
R6	Braikfield Avenue, Kemps Creek	Residential	294,124	6,247,592

ID	Location	Land Use	Coordinates (UTM)	
			mE	mS
R7	Western Avenue, Kemps Creek	Industrial	294,349	6,247,207
R8	Western Avenue, Kemps Creek	Residential	294,466	6,247,953
R9	Victor Avenue, Kemps Creek	Residential	294,133	6,247,525
R10	Victor Avenue, Kemps Creek	Residential	293,570	6,247,541
R11	Martin Road, Bradfield	Industrial	292,600	6,247,284

Source: Northstar, 2026

Figure 39 Receptor Locations



Source: Northstar, 2026

Data from two (2) Air Quality Monitoring Stations (AQMSs) (Bringelly and St Marys) were utilised to inform the AQIA. Bringelly recorded three (3) days where particulate matter (PM) concentrations were above the national standard in 2021 due to extensive hazard reduction burning performed in the Greater Sydney Region. Notwithstanding, based on the data utilised, the assumptions utilised by Northstar to inform the predictions in the AQIA are outlined in the table below.

Table 30 Summary of Background Air Quality Data and Assumptions

Pollutant	Averaging Period	Units	Measured Value	Notes
TSP	Annual	$\mu\text{g}/\text{m}^3$	31.4	Estimated on a TSP:PM ₁₀ ratio of 2.0551: 1
PM₁₀	24-hour	$\mu\text{g}/\text{m}^3$	Daily varying	The 24-hour maximum PM ₁₀ concentration in 2021 was 69.0 $\mu\text{g}/\text{m}^3$
	Annual	$\mu\text{g}/\text{m}^3$	15.3	
PM_{2.5}	24-hour	$\mu\text{g}/\text{m}^3$	Daily varying	The 24-hour maximum PM _{2.5} concentration in 2021 was 57.4 $\mu\text{g}/\text{m}^3$
	Annual	$\mu\text{g}/\text{m}^3$	7.2	
Nitrogen Dioxide (NO₂)	1-hour	$\mu\text{g}/\text{m}^3$	49.2	Hourly maximum 1-hr average in 2021
	Annual	$\mu\text{g}/\text{m}^3$	7.1	Annual average in 2021

Source: Northstar, 2026

Identification of air emissions sources

As documented in the AQIA, the primary potential air emission sources associated with the proposal are:

- **During construction:** fugitive dust generated from bulk earthworks, material handling, wind erosion of exposed surfaces, and vehicle movements, as well as exhaust emissions from diesel-powered plant and equipment; and
- **During operation:** combustion-related emissions from light and heavy vehicle movements, including exhaust emissions and non-exhaust particulate emissions from brake and tyre wear.

No significant stationary point sources are proposed. Any minor ancillary manufacturing activities within Lot 1 would be undertaken within an enclosed building and are not anticipated to result in significant emissions to air.

Sources proximate to the site

Given the industrial and agricultural nature of the area surrounding the site, there is potential for emissions generated as part of the development and other surrounding facilities to impact cumulatively on nearby receptors. Additionally, surrounding sources could result in adverse air quality impacts being experienced at the site.

Cumulative air quality impacts have been assessed in the AQIA (Northstar, 2026), which considered emissions from the proposal in combination with existing, approved and likely developments in the surrounding area. The majority of identified developments are located more than 1.5 km from the site, and facilities within closer proximity are subject to their own regulatory controls and air quality management requirements. On this basis and having regard to the scale and nature of emissions associated with the proposal, cumulative air quality impacts at surrounding receptors are not expected to be significant.

6.1.8.2 Potential Impacts

Construction Phase

The AQIA (Northstar, 2026) includes a quantitative assessment of construction-phase air quality impacts, with bulk earthworks identified as the dominant potential source of particulate matter emissions. Dispersion modelling indicates that predicted incremental and cumulative concentrations of TSP, PM₁₀ and PM_{2.5} during construction comply with the relevant annual and 24-hour assessment criteria at all identified receptors.

Operational Phase

The predicted annual average particulate matter concentrations (as TSP, PM₁₀ and PM_{2.5}) resulting from the proposal are outlined in **Table 31** below. No contour plots have been prepared given the minor contribution from the proposal at the nearest receptors.

Table 31 below confirms that the performance of the proposal does not result in any exceedances of the annual average particulate matter assessment criteria.

Table 31 Predicted Annual Average TSP, PM₁₀ and PM_{2.5} Concentrations

Receptor	Annual Average Concentration (µg/m³)								
	TSP			PM ₁₀			PM _{2.5}		
	Incr.	Bg.	Cumul.	Incr.	Bg.	Cumul.	Incr.	Bg.	Cumul.
Criterion	90			25			8		
Max. % of criterion	<0.1	34.9	34.9	<0.1	61.2	61.4	1.0	90.0	90.6
R1	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R2	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R3	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R4	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R5	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R6	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R7	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R8	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R9	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R10	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3
R11	<0.1	31.4	31.5	<0.1	15.3	15.4	<0.1	7.2	7.3

Notes:

Incr = Incremental Impact; Bg = Background; and, Cumul = Cumulative Impact

Source: Northstar, 2026

Noting the minor incremental concentrations of PM₁₀ and PM_{2.5} predicted by Northstar, Table 14 of the AQIA has not been captured in this EIS. Notwithstanding, the predicted maximum 24-hour average PM₁₀ and PM_{2.5} concentrations resulting from the future operations of the proposal have been considered (refer to **Tables 32 and 33**).

Table 32 Summary of Contemporaneous Impact and Background – PM₁₀

Date	24-hour Average PM ₁₀ Concentration (µg/m³) – R1			Date	24-hour Average PM ₁₀ Concentration (µg/m³) – R1		
	Incr.	Bg.	Cumul.		Incr.	Bg.	Cumul.
27-04-21	0.2	69.0	69.2	06-04-21	0.6	13.8	14.4
03-05-21	<0.1	39.9	40.0	01-12-21	0.6	9.5	10.1
09-10-21	<0.1	36.1	36.2	23-12-21	0.6	17.7	18.3
23-01-21	<0.1	33.5	33.6	21-03-21	0.5	13.7	14.2
21-08-21	<0.1	32.2	32.3	19-02-21	0.5	15.8	16.3
08-10-21	<0.1	31.1	31.2	20-02-21	0.5	12.4	12.9
07-10-21	<0.1	31.0	31.1	29-01-21	0.5	9.9	10.4
04-05-21	<0.1	30.5	30.6	09-02-21	0.5	12.8	13.3
14-04-21	<0.1	30.4	30.5	24-12-21	0.5	10.7	11.2
02-06-21	0.1	29.7	29.8	24-12-21	0.5	14.4	14.9

Source: Northstar, 2026

Table 33 Summary of Contemporaneous Impact and Background – PM_{2.5}

Date	24-hour Average PM _{2.5} Concentration (µg/m³) – R1			Date	24-hour Average PM _{2.5} Concentration (µg/m³) – R1		
	Incr.	Bg.	Cumul.		Incr.	Bg.	Cumul.
27-04-21	0.2	57.4	57.6	06-04-21	0.6	6.6	7.2
04-05-21	<0.1	27.3	27.4	23-12-21	0.5	7.7	8.2
03-05-21	<0.1	25.7	25.8	19-02-21	0.6	4.3	4.8
09-10-21	<0.1	22.8	22.9	01-12-21	0.5	6.5	7.0
21-08-21	<0.1	19.7	19.8	09-02-21	0.5	5.1	5.6
23-07-21	<0.1	18.0	18.1	24-02-21	0.4	3.1	3.5
10-10-21	<0.1	17.6	17.7	29-01-21	0.4	1.6	2.0
28-04-21	<0.1	17.0	17.1	21-03-21	0.4	5.6	6.0

Date	24-hour Average PM _{2.5} Concentration (µg/m³) – R1			Date	24-hour Average PM _{2.5} Concentration (µg/m³) – R1		
	Incr.	Bg.	Cumul.		Incr.	Bg.	Cumul.
29-04-21	0.1	16.6	16.7	24-12-21	0.4	5.7	6.1
22-07-21	<0.1	16.6	16.7	20-02-21	0.4	4.8	5.2

Source: Northstar, 2026

In accordance with **Tables 32** and **33** above, the proposed development does not result in any exceedances of the 24-hour average particulate matter impact assessment criteria.

Emissions for NO_x have been calculated, with subsequent ground-level concentrations predicted using dispersion modelling techniques. Given that NO_x is a mixture of NO₂ and nitric oxide (NO), conversion of NO_x to NO₂ concentrations can be performed for the purposes of the proposal. The results within the AQIA indicate that the predicted incremental concentrations of combustion-related pollutants (characterised by NO₂) are below the criteria at all surrounding receptor locations.

The AQIA demonstrates that the proposal achieves all relevant air quality criteria during both construction and operation. Construction-phase emissions will be managed through the implementation of standard dust control measures and a Trigger Action Response Plan, including real-time monitoring and adaptive management. During operation, good site management practices, such as minimising vehicle idling and observing on-site speed limits, will be implemented. On this basis, no additional project-specific air quality mitigation measures are required.

6.1.9 Traffic

The site-specific SEARs state the applicant must provide a quantitative traffic impact assessment that includes:

- details of consultation with Transport for NSW, including consultation on the relationship between the development and any existing or proposed transport infrastructure upgrades required for the proposal or in the surrounding area.
- details of all daily and peak traffic volumes likely to be generated during all key stages of construction and operation, including a description of key access / haul routes, vehicle types and potential queuing impacts.
- an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network.
- details of road upgrades, infrastructure works or new roads or access points required for the development, in accordance with the outcomes of consultation with TfNSW, including interim and ultimate site access arrangements.
- detailed plans of the site access and proposed layout of the internal road and pedestrian network and parking on site in accordance with the relevant Australian Standards, Western Sydney Aerotropolis Precinct Plan and DCP.
- plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network.
- details and plans of the internal road network, on-site parking, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards.

- details of the largest vehicle anticipated to access and move within the site, including swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site.

A Transport Assessment has been prepared by Ason Group (**Appendix EE**) to assess and analyse the potential traffic, access and parking related impacts associated with the proposal. Pre-lodgement consultation has been undertaken with Transport for NSW (TfNSW) in relation to the proposed development. TfNSW feedback addressed the traffic modelling approach, background growth assumptions, the scope of committed upgrades to Elizabeth Drive, and the relationship between interim and ultimate access arrangements, including potential future upgrades to Pitt Street. The Transport Assessment has been prepared having regard to this feedback, with consultation correspondence provided at Appendix A of the Transport Assessment (Ason Group, 2026).

6.1.9.1 Existing Environment

The site is characterised as vacant land that has a frontage to Martin Road at its eastern boundary. There is no existing formal vehicular access to the site. The existing surrounding intersections were assessed for their performance using SIDRA modelling software. It employed TfNSW's commonly used measure of intersection performance, which is Level of Service (LOS). The results demonstrate Elizabeth Drive/Martin Road intersections operate well at a LOS A in both AM and PM peak hours.

The existing public and active transport in the vicinity of the site is limited. The nearest bus stop is located at the intersection of Elizabeth Drive and Martin Road, over 2km from the site. It provides services between Badgerys Creek and Liverpool. Martin Road is currently classified as a local road and is designated as a National Heavy Vehicle Regulator (NHVR) approved 25/26-metre B-double route. The Transport Assessment confirms that the surrounding road network, including Elizabeth Drive and Martin Road, forms part of the broader freight network serving the Western Sydney Aerotropolis (Ason Group, 2026).

There is no train or metro station in proximity to the site. However, there are plans to increase public transport options in the area as the Aerotropolis develops. The surrounding bus network is planned to expand and a new Sydney Metro – Western Sydney Airport metro railway will connect to Western Sydney. In addition, there is currently limited active transport infrastructure in the vicinity of the site, with no dedicated pedestrian or cycling facilities along the Lawson Road or Pitt Street frontages of the site. Similarly, as development increases in the Aerotropolis, the surrounding active transport will be expanded.

6.1.9.2 Potential Impacts

Construction Traffic

A Preliminary Construction Traffic Management Plan (CTMP) was prepared to detail the proposed management of the construction stage of the project. The CTMP, which confirms that construction traffic during peak network periods is not expected to exceed the operational peak hour traffic volumes of the proposal (56 vehicles in the AM peak and 77 vehicles in the PM peak). Construction vehicle access will be via Martin Road, using approved National Heavy Vehicle Regulator routes, with all construction vehicle queuing, loading and unloading accommodated within the site boundary to avoid impacts on the public road network (Ason Group, 2026).

Access is proposed to be provided to all construction vehicles via Martin Road. 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. These routes are to be utilised by all construction vehicles travelling to and from the site and represents the shortest route between the local and regional road network, minimising the impacts of the construction.

The estimated operational traffic volumes are provided in the following section. Given the construction traffic generation is not expected to exceed the operational peak hour traffic generation, a detailed CTMP will review and address construction vehicular traffic throughout each stage of the development. The relevant considerations include:

- Light Vehicle traffic generation would generally be associated with staff movements to and from the Site. Staff likely include project managers, various trades, and general construction employees. 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 Conditions of Consent (CoC) for the proposal.

The heavy vehicles would be travelling along several approved National Heavy Vehicle Regulator (NHVR) routes which would mitigate road safety impacts along local roads. It is expected heavy vehicles up to 20m AVs may be accommodated including at associated intersections. Traffic Guidance Schemes for the site access will be designed to minimise vehicle, pedestrian and cyclists impacts along Martin Road as far as practicable.

Operational Traffic

The TfNSW Guide to Transport Impact Assessment 2024 (GTIA) was employed to provide traffic generation rates for 'large format warehousing'. Ason Group, in collaboration with TfNSW, conducted surveys that informed the development of the warehouse traffic generation rates in the GTIA. These rates reflect the most up-to-date insights into traffic behaviour associated with large-format warehousing operations. The traffic generation rates are based on surveys conducted at 11 industrial developments of varying size across Sydney.

Using these trip generation rates, the proposed traffic generation was calculated for the proposed development. It is noted that Lot 1 of the Proposal has a known tenant. Therefore, the tenant-specific trip generation during the network peak hour will be applied to Lot 1, while the GTIA rates above will be applied to Lot 2.

The operational traffic volumes were estimated, highlighting the following results.

- AM Network Peak: 56 movements per hour (movements, in & out combined)
- PM Network Peak: 77 movements per hour (movements, in & out combined)
- Daily: 975 movements per day (movements, in & out combined)

All operational servicing, loading and unloading activities are designed to occur wholly within the site. The Transport Assessment confirms that sufficient on-site queuing capacity is provided to accommodate all vehicles awaiting loading, unloading or servicing, ensuring that no vehicle queuing will occur on Martin Road or the surrounding street network.

Ason Group identified the future intersection performance of Elizabeth Drive and Martin Road. Upgrades are proposed by TfNSW on Elizabeth Drive, to include two lanes in each direction, a central median, landscaping, and shared paths to improve safety and ease congestion for nearby communities. In terms of the site, it is located south of the Elizabeth Drive East upgrade area. Proposed arrangements near Lawson Road and Martin Road include additional travel lanes on Elizabeth Drive, new turning lanes at the signalised Martin Road intersection, and new bus stops with bus jump lanes. The Elizabeth Drive / Lawson Road intersection is proposed to operate as left-in/left-out only. In addition, an interim upgrade is proposed to Elizabeth Drive and Martin Road under an approved DA-24/0775 with Penrith City Council. It involves a proposed industrial development located on the land to the north of this intersection. DA-24/0775 was approved on 25 October 2025 and proposed ~100,000m² of GFA to the proposed north leg of the subject intersection. It is noted no timeline exists for DA-24/0775 for the construction of the interim layout; therefore, the interim arrangement of the Elizabeth Drive / Martin Road intersection has not been considered further in any traffic modelling scenarios discussed later in this report.

The Transport Assessment identifies both interim and ultimate access arrangements for the site. Interim access is provided via Martin Road, with ultimate access arrangements designed to integrate with the future Eastern Ring Road (Martin Road) corridor and planned upgrades to Elizabeth Drive and Pitt Street as

identified in the Western Sydney Aerotropolis Precinct Plan. The proposed access strategy has been designed to remain functional under both interim and ultimate road network scenarios (Ason Group, 2026).

The report includes an assessment of the likely traffic impact of the proposal on the surrounding road network. Traffic modelling was completed for the following intersections scenarios in SIDRA:

- Elizabeth Drive / Martin Road
- Elizabeth Drive / Cleanaway site access
- Martin Road / Proposal site access

The results indicate the Elizabeth Drive/Martin Road intersection expected to continue operating satisfactorily with and without the development at a LOS B or better in both the AM and PM peak hours. The proposed traffic generation is expected to result in negligible increases in delay during the peak hours.

A mid-block capacity assessment for Martin Road has been undertaken for day-one operations (refer **Figure 40**). Based on the operational impacts and existing traffic generation on the surrounding road network, Ason Group note that the mid-block volumes in both the northbound and southbound directions remain well below the 900 pcph/lane one-way threshold at the 2027 opening year. On this basis, Ason Group note that additional lane upgrades to Martin Road would not be required from a traffic volume perspective to support the day-one operations of the proposal.

Figure 40 Mid-Block Assessment

Scenario	AM Peak (northbound)	AM Peak (southbound)	PM Peak (northbound)	PM Peak (southbound)
Surveyed (2025)	61	77	55	54
Baseline (2027)	67	84	61	59
Proposed Development	25	61	78	39
Total (Baseline 2027 + Proposed Development)	92	145	139	98

Note: units are passenger car unit movements per hour (pcph)

Source: Ason Group

The Transport Assessment concludes that the additional traffic generated by the proposal is not expected to result in any material road safety impacts. Intersection modelling indicates satisfactory performance at all assessed intersections, with no unacceptable increases in delay or queuing. Site access design, internal circulation and driveway layouts have been developed in accordance with relevant Australian Standards to ensure safe interaction between light vehicles, heavy vehicles, pedestrians and cyclists

Parking and Active Transport

The Transport Assessment confirms that the parking design (car and bicycle) generally complies with the provisions of the AS2890 series (AS2890.1 and AS2890.3) (Table 4-4 of the TIA).

The parking requirements for the development are prescribed by the WSADCP. Car parking is considered in **Table 34** and bicycle parking is considered within **Table 35**.

Table 34 Car Parking Requirements for the Proposal – WSADCP 2022

Land Use	GFA	DCP Car Parking Rate	Requirement for Proposal	Provided
Lot 1	17,102sqm (16,502 sqm of Warehouse GFA) (600 sqm of office GFA)	Min: 1 space per 300sqm LFA, Max: 1 space per 100sqm LFA	Min. 70 parking spaces Max. 180 parking spaces	86 parking spaces

Land Use	GFA	DCP Car Parking Rate	Requirement for Proposal	Provided
Lot 2	19,668sq.m (18,564 sqm of Warehouse GFA) (1,104 sqm of office GFA)	Min: 1 space per 300sqm LFA, Max: 1 space per 100sqm LFA	Min. 90 parking spaces Max. 214 parking spaces	119 parking spaces

The proposal will provide 86 parking spaces for Lot 1 and 119 parking spaces for Lot 2.

Table 35 Bicycle Parking Requirements for the Proposal – WSADCP 2022

Land Use	Yield	DCP Bicycle Parking Rate	Requirement for Proposal	Provided
Lot 1	17,102sqm	1 space per 1,000 sqm of gross floor area of industrial activities	18 bicycle spaces	18 parking spaces
Lot 2	19,668sqm	1 space per 1,000 sqm of gross floor area of industrial activities	20 bicycle spaces	20 parking spaces

The proposal will provide 18 parking spaces for Lot 1 and 20 parking spaces for Lot 2.

The Transport Assessment confirms that the largest design vehicle anticipated to access and manoeuvre within the site is a 30-metre B-double. Swept path analysis has been undertaken to demonstrate that heavy vehicles, service vehicles and emergency vehicles can safely enter, exit and circulate within the site, including access to loading docks and turnaround areas. Swept path diagrams are provided in Appendix B of the Transport Assessment.

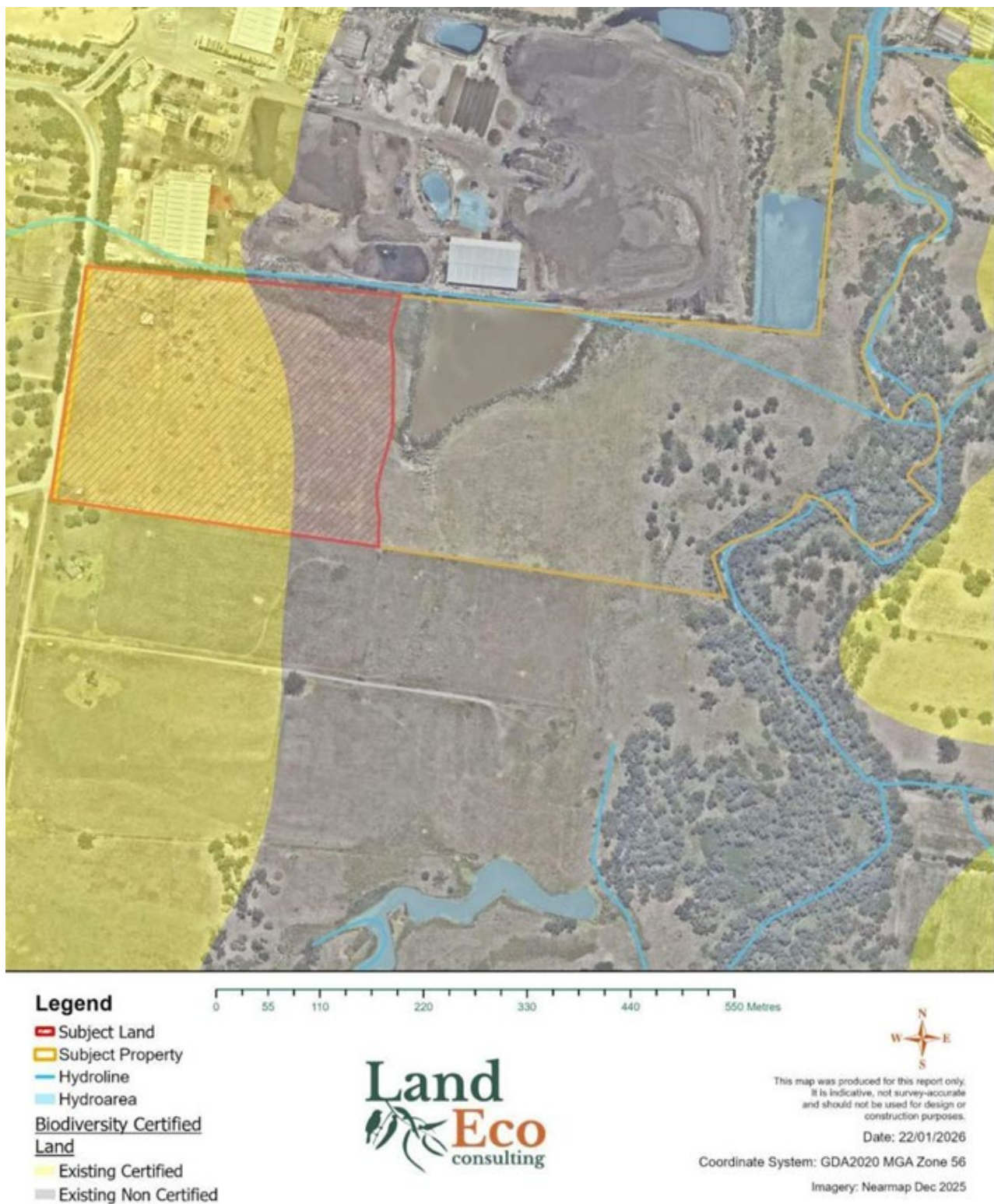
A Preliminary Green Travel Plan has been prepared as part of the Transport Assessment (Section 7) to support reduced reliance on private vehicle travel over time. A final Green Travel Plan will be prepared prior to occupation of the development, in accordance with any Conditions of Consent, and will include mode share targets, implementation measures and ongoing monitoring and review.

6.1.10 Biodiversity

The site-specific SEARs state the applicant must provide an assessment of the proposal's biodiversity impacts in accordance with the Biodiversity Conservation Act 2016. This includes the preparation of a Biodiversity Development Assessment Report and the identification of certified and non-certified land within the site.

A Biodiversity Assessment Report (BDAR) has been prepared by LandEco Consulting (refer to **Appendix M**). The Biodiversity Assessment has been undertaken in accordance with the *Biodiversity Conservation Act 2016* and the Biodiversity Assessment Method (BAM). The BDAR has been prepared by a suitably qualified assessor. The BDAR identifies biodiversity certified and non-certified land within the site, quantifies impacts to native vegetation, threatened ecological communities and threatened species, assesses the potential for Serious and Irreversible Impacts (SAIL), and determines the biodiversity offset obligations arising from residual impacts. The assessment confirms that no SAIL will occur and identifies the retirement of ecosystem and species credits required to offset residual impacts in accordance with the NSW Biodiversity Offsets Scheme.

Figure 41 Biodiversity certified and non-certified land



Source: LandEco Consulting (2026)

Biodiversity certification applies only to the areas shown in **Figure 41** above. Clearing within certified land does not require assessment under the Biodiversity Assessment Method. All vegetation clearing proposed within non-certified land (2.95 hectares) has been assessed in the BDAR in accordance with the BAM, and associated offset obligations have been calculated accordingly.

Land Eco confirm that the proposed development is unlikely to result in significant impacts on any MNES identified or adjacent to the site. No Grey-headed Flying-fox foraging or breeding habitat will be directly

affected, therefore impacts to this species are expected to be non-significant. A stand of River-Flat Eucalypt Forest on Coastal Floodplains of southern New South Wales and eastern Victoria CEEC occurs to the east of the Subject Property but lies outside the proposal area. While indirect impacts may occur, these are not anticipated to be significant.

Latham's Snipe and Sharp-tailed Sandpiper were recorded within the artificial impoundment east of the Subject Land, and the adjacent vegetation. The artificial impoundment constitutes internationally important habitat for Latham's Snipe, as it was found to support more than 18 individuals observed during a single survey (a maximum of 20 individuals were observed on one night in 2026). The habitat does not meet the criteria for important habitat for the Sharp-tailed Sandpiper, with only two individuals recorded (below the 0.1% population threshold for the East-Australasian Flyway). As the majority of wetland habitat supporting foraging by these species will be retained and protected, impacts to both migratory shorebird species are expected to be non-significant. While some indirect impacts may occur, these are unlikely to affect the viability of local populations.

The BDAR concludes that the proposal is not likely to have a significant impact on Matters of National Environmental Significance under the *Environment Protection and Biodiversity Conservation Act 1999*. The proposed referral to the Commonwealth Minister for the Environment is precautionary and does not imply that the action is likely to be a controlled action.

6.1.10.1 Existing environment

The site comprises a large lot landholding that has historically been cleared and use for agricultural purposes (cattle grazing). It is bounded by South Creek to the east.

Remnant native vegetation on the site is a patch of *Eucalyptus tereticornis*, *Eucalyptus amplifolia*, *Angophora subvelutina* and *Ango floribunda* that grows on the floodplain of South Creek

An artificial waterbody with surrounding native wetland vegetation is located towards the centre of the site. This waterbody is an area of lower relief than the surrounding floodplain. It is possibly a paleochannel of Kemps Creek that was filled with sediment to the point that it only occasionally carried surface water for short periods of time, during major rainfall events.

The site contains land mapped as 'Biodiversity Value'. This land is associated with South Creek and is located along the site's eastern boundary. The site contains a network of terrestrial habitat connections associated with the artificial waterbody and remnant native vegetation. A summary of the landscape features identified within the site and land within a surrounding 1,500 metre buffer is included in the table below.

Table 36 Landscape features

Landscape Feature	Identification of landscape feature on site
Rivers and Streams (classified according to stream order)	A first order tributary to South Creek is mapped approximately 10m north of the site on land owned by ANL. However, this land has been developed and the stream is not visibly evident.
Wetlands (within, adjacent to and downstream of site)	The part of the site in which the warehouse buildings and associated hardstand are located and the surrounding area (within the 1500m buffer) do not contain any areas of native vegetation identified as 'Coastal Wetlands' as per the State Environmental Planning Policy (Coastal Management) 2018. An artificial waterbody is located near the centre of the site. This waterbody is an area of lower relief than the surrounding floodplain. It is possibly a paleochannel of South Creek that was filled with sediment to the point that it only occasionally carried surface water for short periods of time, during major rainfall events. When the Australian Native Landscapes facility

Landscape Feature	Identification of landscape feature on site
	was built at 210 Martin Road, Badgerys Creek (due north of the site) the paleochannel was cut-off and surface water that flowed into this depression accumulated such that by April 2022 the paleochannel resembled a large semi-permanent waterbody or wetland. Historical imagery from 1986 suggests that this waterbody may not have originally occurred within the site.
Connectivity features	The identified area of habitat connectivity between the site and native vegetation within the 1500m buffer zone has the potential to provide habitat for a number of threatened species, endangered populations and migratory species. The site contains a network of terrestrial habitat connections associated with the artificial waterbody and the remnant vegetation associated with the floodplain of South Creek. The majority of the part of the site in which the warehouse buildings and associated hardstand will be located consists of exotic grassland.
Areas of geological significance and soil hazard features	No areas of geological significance (karsts, caves, crevices or cliffs) were identified within the site

None of the vegetation in the part of the site in which the warehouse buildings and associated hardstand will be located corresponds to a Threatened Ecological Community (TEC). Notwithstanding, the remnant vegetation in the eastern part of the site qualifies as a TEC. This vegetation comprises Plant Community Type 4025 '*River-flat eucalypt forest on coastal floodplains of the NSW North Coast, Sydney Basin and South East Corner bioregions*' (Riverflat Forest), which is listed as an Endangered Ecological Community (EEC) under Schedule 1 of the BC Act. Where Plant Community Type 4025 occurs as derived grassland with the site, it is not considered to form part of the Riverflat Forest Endangered Ecological Community because this community does not occur in a derived grassland form.

Vegetation Integrity Survey Plots were assessed during the investigation of biodiversity values. The assessor must determine an offset for the impacts of proposals on the habitat of threatened species assessed for ecosystem credits and associated with a PCT in a vegetation zone with a vegetation integrity score (VIS) of ≥ 17 . The results identified:

- 'PCT 3962: Degraded' within the Subject Land, the score is over 17 and is associated with threatened species habitat (as represented by ecosystem credits), therefore, offset credits must be retired to offset residual impacts from the development.
- 'PCT 4025: Exotic Dominant' within the Subject Land, the score is under 17 therefore, offset credits are not required to be retired to offset residual impacts from the development.

The proponent is required to retire biodiversity offset credits in order to meet their obligations to offset the residual impacts of the proposed DA.

Table 35 Vegetation Integrity Score from the BAMC

Vegetation zone ID	Composition condition score	Structure condition score	Function condition score	Vegetation integrity score	Hollow bearing trees present?
PCT 3962: Degraded	67.8	31.6	N/A	46.3	No
PCT 4025: Exotic Dominant	5.5	18.5	2.2	6	No

Figure 42 site features



Source: LandEco Consulting (2024)

Figure 43 Biodiversity Values



Source: LandEco Consulting (2024)

The extent of native vegetation located within a 1,500 metre radius of the part of the site in which the warehouse buildings will be constructed is set out below.

Table 36 Native vegetation within 1,500 metre of the 'Subject Land'

Assessment area (ha)	885ha
Total area of native vegetation cover (ha)	224.5 (225 in the BAM-C)
Percentage of native vegetation cover	25.4% (25% in the BAM-C)
Class (0-10, >10-30, >30-70 or 70%)	>10-30%

Figure 44 Plant community types and mapped watercourses



Source: LandEco Consulting (2024)

Habitat suitability for threatened species

Two species that are listed as Vulnerable and Migratory under the Environment Protection and Biodiversity Conservation Act (**EPBC Act**) were also recorded within the site. Whilst these species are not listed under the Biodiversity Conservation Act, the residual and prescribed impacts from the proposed development upon these species is assessed in the BDAR. In addition, the Grey-headed Flying-fox listed as Vulnerable under the BC Act and EPBC Act was observed to be flying over the site during targeted surveys in 2021 and 2022. No individuals were recorded using the Subject Land to forage or rest. The site contains a variety of habitat features for fauna species listed under the EPBC Act, as outlined below.

Table 37 Results for EPBC Act listed species present (recorded within the 'Subject Land')

Common name	Scientific name	Abundance – No. present on the 'Subject land' (flora with unit of measure as count)	Extent (ha) of suitable habitat present on site (flora or fauna with unit of measure as area)
Latham's Snipe	Gallinago hardwickii	Maximum of 20 individuals in one survey session	0.56 (PCT 3962 only)
Sharp-tailed Sandpiper	Calidris acuminata	Maximum of two individuals in one survey session	0.56 (PCT 3962 only)
Grey-headed Flying-fox	Pteropus poliocephalus	Maximum of two individuals were observed flying over the Subject Land and foraging in trees in east of Subject Property during targeted surveys	2.95

Source: LandEco (2024)

The proposed development has been largely located to avoid direct impacts to native vegetation, threatened ecological communities, the artificial wetland, threatened species and their habitat. The development is designed to limit the development footprint to avoid direct impacts to the artificial wetland, remnant River-flat Eucalypt Forest CEEC and threatened species habitat. No hard structures will be located within the artificial wetland and River-flat Eucalypt Forest EEC. Although a small portion of the wetland habitat occurs within the site, this vegetation is in a degraded condition from heavy grazing.

The proposed development has been designed to avoid areas of High Biodiversity value along the eastern boundary of the Subject Property (at its interface with South Creek) and to limit the development footprint to minimise direct impacts to the artificial waterbody, River-flat Eucalypt Forest EEC and threatened species habitat.

6.1.10.2 Potential Impacts

A total of 8.80ha of native vegetation and 8.67 will be removed as part of the proposed development. The majority of this vegetation has been previously conferred Biodiversity Certification. As such, this report will only assess the impacts to 2.95 ha of non-biodiversity certified native vegetation in accordance with the Biodiversity Assessment Method (BAM), as well as the calculation and retirement of biodiversity offset credits to address associated impacts. This vegetation belongs to two plant community types (PCTs):

- PCT 3962: Coastal Floodplain Phragmites Reedland (0.56 ha removal)

- PCT 4025: Cumberland Red Gum Riverflat Forest (2.39 ha removal)

The majority of vegetation mapped as PCT 4025 within the Subject Land comprises historically cleared, pasture-improved grassland. Although considered native and assigned to PCT 4025, the vegetation is extremely species-poor and structurally incomplete, with *Cynodon dactylon* dominating—a cultivated pasture species whose abundance is likely artificial. As a result, the vegetation integrity (VI) score is <15, below the threshold which requires further assessment or the generation of Ecosystem Credits. Thirteen (13) Ecosystem Credits are required to be retired to offset the biodiversity impacts of the proposal.

The following threatened species were recorded on the Subject Property by Land Eco:

- Southern Myotis (*Myotis macropus*) – BC Act: Vulnerable; Species Credit
- White-bellied Sea-eagle (*Haliaeetus leucogaster*) – BC Act: Vulnerable; Ecosystem Credit
- Grey-headed Flying-fox (*Pteropus poliocephalus*) (foraging) – BC Act: Vulnerable, EPBC Act: Vulnerable; Ecosystem Credit
- Latham's Snipe (*Gallinago hardwickii*) – BC Act: Vulnerable, EPBC Act: Vulnerable, Migratory
- Eastern Coastal Free-tailed Bat (*Micronomus norfolkensis*) – BC Act: Vulnerable; Ecosystem Credit
- Eastern False Pipistrelle (*Falsistrellus tasmaniensis*) – BC Act: Vulnerable; Ecosystem Credit
- Greater Broad-nosed Bat (*Scoteanax rueppellii*) – BC Act: Vulnerable; Ecosystem Credit
- Large Bent-winged Bat (foraging) (*Miniopterus orianae oceanensis*) – BC Act: Vulnerable; Ecosystem Credit
- Sharp-tailed Sandpiper (*Calidris acuminata*) – BC Act: Vulnerable, EPBC Act: Vulnerable, Migratory

Only one of these species (Southern Myotis) is a Species Credit Species that will require the retirement of Species Credits. As such, 20 Species Credits for the Southern Myotis are required to be retired to offset the biodiversity impacts of the proposal. Impacts will include the removal of 2.95 ha of native vegetation and two hollow-bearing stags with small to medium-sized hollows suitable for microbats including the Southern Myotis. Minor indirect impacts may influence the artificial wetland within the Subject Property. There will be no Serious and Irreversible Impacts as a result of the proposed development.

The proponent is required to retire biodiversity offset credits in order to meet their obligations to offset the residual impacts of the proposed DA. Should native vegetation clearing be required, the proponent may purchase and retire the appropriate biodiversity offset credits from Biodiversity Stewardship Sites that comply with the trading rules of the BOS in accordance with the 'like for like' report generated by the Biodiversity Assessment Method Calculator. Alternatively, the proponent can meet their offset obligations by making a payment directly into the NSW Biodiversity Offsets Payment Fund. In total, 13 ecosystem credits are required and 20 species credits are required to offset the impacts of the proposed development.

The BDAR identifies the prescribed impacts arising from the proposed development as follow:

- **Southern Myotis**
 - may roost and breed in existing sheds located in the north-west of the site
 - may forage around areas of non-native vegetation,
 - may utilise corridors between habitat terrestrial habitat connections
 - may utilise the existing waterbody for foraging, though the assessment notes this is unlikely to be impacted due to retention of this feature as part of the development.
- **Short Tailed Snipe**
 - may utilise corridors between habitat terrestrial habitat connections
 - may utilise the existing waterbody for foraging, though the assessment notes this is unlikely to be impacted due to retention of this feature as part of the development.

Avoid and minimise direct and indirect impacts

The proposed development has been located to minimise direct impacts to native vegetation, ecological communities, TEC's, threatened species, the artificial wetland and their habitat. Direct impacts to native vegetation are limited to 2.95 ha of native vegetation removal, although the majority (2.39 ha) of the Subject Land is occupied by pasture-improved grassland with a low VI score of six (6).

The artificial waterbody and River-flat Eucalypt Forest EEC within the wider site will continue to occur post-development. A small portion of wetland habitat occurs within the part of the site in which development is proposed. However, this vegetation is in a degraded condition (as a result of heavy grazing) and retained areas outside of the Subject Land will be protected and enhanced under the Vegetation Management Plan (VMP).

Avoid and minimise prescribed impacts

The proposed development will impact man-made structures, non-native vegetation, habitat connectivity and increase the risk of vehicle strikes. However, these impacts have been avoided where possible and minimised to avoid significant impacts on any threatened entities.

Table 38 Measures to locate the proposal to avoid or minimise direct and indirect impacts on native vegetation, threatened species, threatened ecological communities and their habitat

Matter	Comment
How has the proposal been located in areas lacking biodiversity values?	The 'Subject Land' has been largely located on historically cleared, exotic dominated grassland. Direct impacts to the artificial waterbody and remnant vegetation in the east of the 'Subject Property' have been avoided except a small portion of wetland vegetation surrounding the artificial waterbody. No hard structures are proposed within the wetland, only APZ management. No highly valuable foraging or breeding habitat will be impacted by the proposed development.
How has the proposal been located in areas where the native vegetation or threatened species habitat is in the poorest condition (i.e. areas that have a low vegetation integrity score)?	The Subject Land has been largely located on historically cleared, pasture-improved grassland (ie. 'PCT 4025: Derived Pasture which has a VI score of 6). The native wetland vegetation to be impacted is in moderately poor condition and yields a vegetation integrity score of 46.3/100. The remnant River-Flat Eucalypt Forest EEC within the east of the Subject Property will not be directly impacted.
How does the proposal avoid habitat for species with a high biodiversity risk weighting or land mapped on the important habitat map, or native vegetation that is a TEC or a highly cleared PCT.	No important habitat will be impacted by the proposed development. No Serious and irreversible impacts (SAII) entities will be impacted by the proposed development. The River-Flat Eucalypt Forest EEC in the east of the Subject Property will remain unimpacted. The artificial wetland will continue to offer foraging habitat for a range of species after the proposed development
Has the proposal been located outside of the buffer area around breeding habitat features such as nest trees or caves?	The proposed development has been located and designed to minimise impacts on important habitat features. While two hollow-bearing stags are likely to be removed for the proposed development, these trees are not highly valuable. They occur within a highly disturbed paddock with limited native vegetation and are impacted by light pollution from the ANL industrial facility to the north

Matter	Comment
Has the proposal sought alternative	
Modes of technologies that would avoid or minimise impacts on biodiversity values	Screen planting of trees is proposed along the development footprint edge. This screen planting is to be managed in accordance with IPA Asset Protection Zone requirements.
Routes that would avoid or minimise impacts on biodiversity values	The Subject Land has been positioned along Martin Road, which eliminates the need for clearing any additional habitat to build access routes. As such no direct impacts to highly valuable foraging or breeding habitat will be impacted by the proposed development.
Locations that would avoid or minimise impacts on biodiversity values	The Subject Land has been largely located on historically cleared, exotic dominated grassland. The proposed development has been positioned to the west of the Subject Property to avoid habitat with high biodiversity value such as the artificial waterbody and riparian vegetation located along South Creek. No highly valuable foraging or breeding habitat will therefore be impacted by the proposed development.
Sites within a property on which the proposal is located that would avoid or minimise impacts on biodiversity values.	The Subject Land has been largely located on historically cleared, exotic dominated grassland. Direct impacts to the artificial waterbody and remnant vegetation in the east of the Subject Property have been avoided except for a small portion (0.56 ha) of wetland vegetation. No highly valuable foraging or breeding habitat will be impacted by the proposed development. The development footprint has been situated and limited to the part of the Subject Property with the least biodiversity value.
Detail the site constraints that have contributed to selecting this location	
Bushfire protection requirements, including clearing for asset protection zones	The proposed development has been designed to include an APZ as determined by Travers Bushfire Ecology
Flood planning levels	The majority of the development has been located to avoid flood prone lands.
Servicing constraints	The development has been located close to Martin Road frontage and the associated services. The choice of the development site is to provide services to the Aerotropolis and Western Sydney economy

Source: LandEco (2024)

The proposed development has been designed to limit the development footprint to avoid prescribed impacts to the artificial waterbody, River-flat Eucalypt Forest EEC and threatened species habitat.

Table 39 Design the proposal to avoid or minimise direct and indirect impacts on native vegetation, threatened species, threatened ecological communities and their habitats

Matter	Comment
Efforts to reduce the proposal's clearing footprint by minimising the number and type of facilities	The development footprint has largely been situated and limited to the part of the Subject Property with the least biodiversity value. Direct impacts to native vegetation are limited to 2.95 ha of native vegetation removal, although the majority (2.39 ha) of the Subject Land is occupied by pasture-improved grassland with a low VI score of six (6).
Efforts to locate ancillary facilities in areas that have no biodiversity values	The development footprint has been situated and largely limited to the part of the Subject Property that is dominated by pasture-improved grassland which has the least biodiversity value. The proposed development will remove 2.95 ha of native vegetation, although the majority (2.39 ha) of the Subject Land is occupied by pasture-improved grassland with a low VI score of six (6).
Efforts to locate ancillary facilities in areas where the native vegetation or threatened species habitat is in the poorest condition (i.e. areas with the lowest vegetation integrity scores)	The proposed development will remove 2.95 ha of native vegetation, although the majority (2.39 ha) of the Subject Land is occupied by pasture-improved grassland with a low VI score of six (6). The native vegetation to be removed is in a poor condition and edge effected with the adjacent exotic vegetation. The threatened species habitat within the Subject Land is highly degraded and does not represent an important habitat to any species.
Efforts to locate ancillary facilities in areas that avoid habitat for species and vegetation that has a high threat status (e.g. an endangered ecological community (EEC) or critically endangered ecological community (CEEC) or is an entity at risk of a serious and irreversible impact (SAIL))	The PCT 3962 does not meet the Final Determination of any TECs. The River-Flat Eucalypt Forest EEC in the east of the Subject Property outside of the Subject Land will not be impacted by the proposed development. No SAIL entities will be impacted by the proposed development.
Actions and activities that provide for rehabilitation, ecological restoration and/or ongoing maintenance of retained areas of native vegetation, threatened species, threatened ecological communities and their habitat on the Subject Land.	The landscaping species have been selected to reduce wildlife attraction. A Vegetation Management Plan has been prepared to accompany the SSDA that demonstrates how the vegetation within the Subject Property will be rehabilitated/maintained, with a particular focus on the wetland habitat and the River-flat Eucalypt Forest EEC.

Source: LandEco (2024)

The BDAR assessed the proposal against the Serious and Irreversible Impact criteria under the BAM and confirmed that no SAIL entities are present within the impact area and that the proposal will not result in any Serious and Irreversible Impacts.

Residual Direct Impacts

The direct impacts of the proposed development on threatened entities and their habitat have been assessed and are summarised in the table below.

Table 40 Summary of residual direct impacts

Direct Impact on PCT/TEC/EC or TC & habitat	BC Act Status	EPBC Act Status	SAIL Entity	Project Phase/Timing	Extent
Southern Myotis	Vulnerable	-	No	Construction / Operation	2.95ha
White-bellied Sea Eagle (Foraging)	Vulnerable	-	No	Construction / Operation	2.95ha
Eastern Coastal Free-tailed Bat	Vulnerable	-	No	Construction / Operation	2.95ha
Large Bent-winged Bat	Vulnerable	-	No	Construction / Operation	2.95ha
Eastern False Pipistrelle	Vulnerable	-	No	Construction / Operation	2.95ha
Greater Broad-nosed Bat	Vulnerable	-	No	Construction / Operation	2.95ha
Latham's Snipe	Vulnerable	Vulnerable Migratory Marine	No	Construction / Operation	0.56 ha (PCT 3962 only)
Short-tailed Sandpiper	Vulnerable	Vulnerable Migratory Marine	No	Construction / Operation	0.56 ha (PCT 3962 only)

Source: LandEco (2024)

Indirect Impacts

A detailed summary of residual impacts to threatened species is provided in the table below:

Table 41 Residual impacts to threatened species

Indirect Impact	Impacted Entities	Extent	Frequency	Duration	Project Phase	Likelihood / Consequence
Inadvertent impacts on adjacent habitat or vegetation	PCT 3962 and PCT 4025 River-Flat Eucalypt Forest EEC Southern Myotis Latham's Snipe Sharp-tailed Sandpiper Grey-headed Flying-fox White-bellied Sea Eagle Eastern Coastal Freetailed Bat Large Bent-winged Bat Eastern False Pipistrelle Greater Broad-nosed Bat	Vegetation adjacent to Subject Land	During Construction	Long-term	Construction, Operation	In the unlikely event adjacent vegetation is cleared it is unlikely that this would cause significant impacts to threatened ecological communities or threatened species. The adjacent vegetation already occurs in a degraded condition and is subject to edge effects from the existing surrounding facilities.
Reduced viability of adjacent habitat due to edge effects	PCT 3962 and PCT 4025 River-Flat Eucalypt Forest EEC Southern Myotis Latham's Snipe Sharp-tailed Sandpiper Grey-headed Flying-fox White-bellied Sea Eagle Eastern Coastal Freetailed Bat Large Bent-winged Bat Eastern False Pipistrelle Greater Broad-nosed Bat	Vegetation adjacent to Subject Land	During Construction	Long-term	Construction, Operation	The Subject Land and the surrounding vegetation are already edge-affected including weed infestation. The proposed development will not significantly increase novel edge effects, though may exacerbate existing effects. Increased lighting from the proposed development may discourage the use of the Subject Property for foraging/ roosting microbats and wetland species, however this is unlikely to exacerbate edge effects significantly beyond the status quo in regard to the surrounding industrial land usage.
Reduced viability of adjacent habitat due to noise, dust or light spill	PCT 3962 and PCT 4025 River-Flat Eucalypt Forest EEC Southern Myotis Latham's Snipe Sharp-tailed Sandpiper Grey-headed Flying-fox White-	Vegetation adjacent to Subject Land and	During construction and ongoing	Long-term	Construction, Operation	The proposed development may result in the increase of noise, dust or light spill associated with the construction activities and operation of the recycling facility. However, the Subject Property is already impacted in these ways by the industrial facility to the north. The proposed

Indirect Impact	Impacted Entities	Extent	Frequency	Duration	Project Phase	Likelihood / Consequence
	bellied Sea Eagle Eastern Coastal Freetailed Bat Large Bent-winged Bat Eastern False Pipistrelle Greater Broad-nosed Bat	Artificial Wetland				development is unlikely to exacerbate this reality beyond the current condition given the mitigation measures proposed. The operation of the warehouse facilities may disturb the habitat such that the wetland birds no longer utilise it or reduce their use, resulting in the reduced viability of the habitat.
Transport of weeds and pathogens from the site to adjacent vegetation	PCT 3962 and PCT 4025 River-Flat Eucalypt Forest EEC Southern Myotis Latham's Snipe Sharp-tailed Sandpiper Grey-headed Flying-fox White-bellied Sea Eagle Eastern Coastal Freetailed Bat Large Bent-winged Bat Eastern False Pipistrelle Greater Broad-nosed Bat	Vegetation adjacent to the Subject Land	During Construction	Short-term	Construction	The proposed development will result in soil disturbance on the Subject Land which may result in the propagation and spread of seeds from the soil bank to other parts of the Subject Property. The Subject Property is already severely weed infested across its entirety. The proposed development is unlikely to significantly alter this reality.
Increased risk of starvation, exposure and loss of shade or structure	PCT 3962 and PCT 4025 River-Flat Eucalypt Forest EEC Southern Myotis Latham's Snipe Sharp-tailed Sandpiper Grey-headed Flying-fox White-bellied Sea Eagle Eastern Coastal Freetailed Bat Large Bent-winged Bat Eastern False Pipistrelle Greater Broad-nosed Bat	Vegetation adjacent to Subject Land and Artificial Wetland	During construction and operation	Short-term, possible long-term	Construction, operation	The proposed development will remove exotic grassland vegetation and a small portion of native wetland vegetation that may reduce shelter and increase the risk of exposure for ground-dwelling species. However, the proposed development is unlikely to impact any substantial vegetation resulting in the risk of starvation, exposure and loss of shade or shelter. The operation of the warehouse facilities may disturb the habitat such that the wetland birds no longer utilise it or reduce their use, resulting in these risks.
Loss of breeding habitats	Southern Myotis	Vegetation within the Subject	During Construction	Long term	Construction	Southern Myotis and other Ecosystem Credit Microbats may utilise the built structures (sheds)

Indirect Impact	Impacted Entities	Extent	Frequency	Duration	Project Phase	Likelihood / Consequence
	Ecosystem Credit Microbats	Land and Artificial Wetland	n and Operation			and hollow-bearing stags in the Subject Property for shelter or breeding. This is low quality habitat and not considered likely to inform regular or important breeding habitat, if at all.
Trampling of threatened flora species	Threatened Flora	Vegetation within and adjacent to Subject Land	During construction and ongoing	Long term	Construction, operation	Threatened flora may occur within the Subject Land. Trampling may occur during construction, and the operation of the proposed development. Given the nature of the vegetation within the Subject Land, this additional disturbance is unlikely to have a significant impact on any threatened flora that may occur.
Inhibition of nitrogen fixation and increased soil salinity	PCT 3962 and PCT 4025 River-Flat Eucalypt Forest EEC	Vegetation be retained outside of the Subject Land	During construction and ongoing	Long-term	Construction, Operation	The proposed development will remove a small area of nitrogen fixing vegetation however this is unlikely to substantially exacerbate the status quo in this urbanised locality.
Fertiliser drift	PCT 3962 and PCT 4025 River-Flat Eucalypt Forest EEC	Vegetation to retained outside of the Subject Land	During construction and Ongoing	Long-term	Construction, Operation	The use of fertiliser within the landscaped gardens is likely to negligibly increase as a result of the proposed development. The Subject Property is already impacted by fertiliser drift from surrounding landscaped gardens or agricultural use. The proposed development is unlikely to significantly alter this reality.
Rubbish dumping	PCT 3962 and PCT 4025 River-Flat Eucalypt Forest EEC Southern Myotis Latham's Snipe Sharp-tailed Sandpiper Grey-headed Flying-fox White-bellied Sea Eagle Eastern	Subject Property	During Construction and Operation	Short-term, possible long-term	Construction, operation	The proposed development may inadvertently result in the stockpiling of construction waste on adjacent land. The Subject Land has been subject to the dumping of food waste by the prior owners. The proposed development is unlikely to disturb the adjacent habitat significantly in this way.

Indirect Impact	Impacted Entities	Extent	Frequency	Duration	Project Phase	Likelihood / Consequence
	Coastal Freetailed Bat Large Bent-winged Bat Eastern False Pipistrelle Greater Broad-nosed Bat					
Wood collection	N/A	N/A	N/A	N/A	N/A	N/A
Bush rock removal and disturbance	N/A	N/A	N/A	N/A	N/A	N/A
Increase in predatory species populations	N/A	N/A	N/A	N/A	N/A	The Subject Property is already likely to support a population of predatory species. The proposed development is unlikely to increase the prevalence of predatory species population.
Increase in pest animal populations	Southern Myotis Latham's Snipe Sharp-tailed Sandpiper Eastern Coastal Freetailed Bat Large Bent-winged Bat Eastern False Pipistrelle Greater Broad-nosed Bat	Subject Property	Ongoing	Long-term	Operation	Pest animals such as the European Red Fox (<i>Vulpes vulpes</i>) have already been observed on the Subject Property. The proposed development is unlikely to significantly alter this reality.
Increased risk of fire	N/A	N/A	N/A	N/A	N/A	The proposed development will remove vegetation from the Subject Land and reduce the risk of fire.
Disturbance to specialist breeding and foraging habitat e.g. beach nesting for shorebirds	Migratory Wetland Birds Latham's Snipe Sharp-tailed Sandpiper	Adjacent to Subject Land	Ongoing	Long-term	Construction, Operation	The proposed development will remove a small area of wetland vegetation from the Subject Land that provides potential specialist foraging habitat to migratory wetland birds. The proposed development may result in the increase of noise, dust or light spill associated with the construction activities and operation of the proposed

Indirect Impact	Impacted Entities	Extent	Frequency	Duration	Project Phase	Likelihood / Consequence
						development. However, the Subject Property is already impacted in these ways by the industrial facility to the north. The proposed development is unlikely to exacerbate this reality beyond the current condition given the mitigation measures proposed. The operation of the warehouse facilities may disturb the retained wetland habitat such that the migratory wetland birds no longer utilise it or reduce their use, resulting in the reduced viability of the specialist foraging habitat.
Reduced viability of adjacent habitat due to overshadowing	PCT 3962 and PCT 4025 River-Flat Eucalypt Forest EEC Southern Myotis Latham's Snipe Sharp-tailed Sandpiper Grey-headed Flying-fox White-bellied Sea Eagle Eastern Coastal Freetailed Bat Large Bent-winged Bat Eastern False Pipistrelle Greater Broad-nosed Bat	Vegetation adjacent to the Subject Land	During construction and ongoing	Long-term	Construction, Operation	The proposed development is unlikely to result in insignificant shadowing on the vegetation to be retained outside of the Subject Land. Shadow Diagrams produced by EMKC3 indicate that the proposed development will not cast significant shadow on the vegetation and artificial waterbody proposed to be retained beyond the development footprint such that its likelihood of survival is reduced.
Increased risk of building collision	Migratory Wetland Birds Southern Myotis Latham's Snipe Sharp-tailed Sandpiper Grey-headed Flying-fox White-bellied Sea Eagle Eastern Coastal Freetailed Bat Large Bent-winged Bat Eastern False Pipistrelle Greater Broad-nosed Bat	Adjacent to Subject Land	Ongoing	Long-term	Construction, Operation,	The warehouses proposed will be below 13m in height which may alter flyways and increase the chance of collision, particularly for those birds that utilise the wetland. Although, the buildings will not be tall enough to introduce an adverse novel or significant obstacle to this species and are unlikely to significantly increase mortality via building collisions.

Source: LandEco (2024)

Prescribed Impacts

The BDAR sets out the residual prescribed impacts to human-made structures, non-native vegetation, habitat connectivity, waterbodies, water quality and hydrological processes, and vehicle strikes. The assessment notes that:

- It is unlikely that the human-made structures within the site are regularly utilised by the Southern Myotis or any other threatened species
- The grassland and the small area of wetland vegetation offers minimal habitat value to threatened species including Southern Myotis and threatened raptor species. The consequences of this clearing are unlikely to be significant
- The proposed development will not significantly impact the terrestrial and wetland habitat connections that exist within the Subject Property. The warehouses proposed will be below 13m in height which may alter flyways and increase the chance of collision, particularly for those birds that utilise the wetland. However, the buildings will not be tall enough to introduce an adverse novel or significant obstacle to this species and are unlikely to significantly increase mortality via building collisions.
- The proposed development may discourage the use of the wetland by native fauna. These impacts are being managed in accordance with the Wildlife Hazard Assessment and Wildlife Management Plan, and Vegetation Management Plan produced for the proposed development
- The proposed development will instate low speed-limits to operators utilising driveways and car parks. The Southern Myotis is a fast moving bat that would most likely fly over slow moving vehicles. The Latham's Snipe and Sharp-tailed Sandpiper are fast moving birds that would most likely fly away from slow moving vehicles

Mitigation Measures

The following mitigation measures will be implemented to minimise the residual impacts of the proposed development:

- The Wildlife hazard assessment and wildlife management plan (refer to **Appendix GG**) prepared by LandEco will be implemented.
- The applicant will communicate with WSI before undertaking any actions that could displace birds from the site into the airspace of aircraft that are departing or arriving at the airport.
- The applicant will ensure that any putrescible waste generated by the project is stored in waste receptacles with lids that cannot be opened by wildlife and is disposed of offsite at suitably licensed facilities. All site workers will be informed of the hazards associated with bird and wildlife attraction.
- The applicant will ensure that there is no littering by site personnel. All bins will have lids and will not be left open.
- Plantings will be limited to trees, shrubs and groundcovers that are less likely to attract hazardous wildlife (i.e. avoid flowering or fruiting trees that attract flying-foxes).
- The development will be to minimise potential for hazardous birds (e.g. ibis or cattle egret) establishing new roost colonies. Where colonies establish ecologists will be engaged to prepare a suitable eviction strategy.
- An experienced ecologist will be engaged to prepare a suitable bird/bat eviction strategy in the event the development attracts more birds/bats to the locality (i.e. roost colonies), or if the project is considered likely to disturb birds in a manner that could increase risk to WSI. Landscaping Will be managed to reduce suitability for hazardous bird/bats.
- Any areas of exotic grassland will be slashed and managed in a way that is less attractive to birds.

- Landscaping proposed in previously unvegetated areas will only include species that have a lower 'wildlife attractiveness' rating.
- All waste receptacles will be designed to reduce the accessibility of putrescible waste to scavenging birds such as Australian White Ibis and Australian Raven.
- Any putrescible waste generated by the development will be stored in waste receptacles with lids that cannot be opened by wildlife and is disposed of offsite at suitably licensed facilities. Strict waste management and littering prevention will be implemented.
- The vegetation management plan (**Appendix FF**) will be implemented to detail on-going vegetation management, weed management and maintenance (Land Eco 2024c).
- Prior to construction, a qualified and experienced ecologist (>3 years of experience) will be engaged. The ecologist will assist in identifying and assigning an appropriately skilled bushland restoration professional to implement vegetation planting/restoration within the eastern part of the site that is not being developed. The ecologist will undertake a pre-demolition check of the built structures to identify any sheltering bats such as Southern Myotis. If found the ecologist will document and safely relocate the bats prior to demolition of the structures.
- The construction site compound as well as all construction storage, stockpile and laydown areas will be located away from any native vegetation that is planned to be retained.
- Any soil imported from outside the site will be free of weeds.
- All trees to be retained will be protected in accordance with Australian Standard – Protection of Trees on Development Sites (AS – 4970 – 2009). Works will be avoided within the TPZ of any trees located outside of the development site that require retention.
- Hollow-bearing stags proposed to be removed will be replaced. If possible, the hollows to be removed are to be carefully salvaged within the bushland to be retained within the Subject Property. If hollow salvage is not possible, each hollow will be replaced with a nest box at a 2:1 replacement ratio.
- Appropriate erosion and sediment control will be erected and maintained during construction. At a minimum, such measures will comply with the relevant industry guidelines such as 'the Blue Book' (Landcom 2004).
- Stormwater will be managed according to the Civil Infrastructure Plans.
- Lighting will be minimised to wherever it is required. Lighting will be turned off at designated times in the evening to reduce impacts of light spill on biodiversity and the environment. Warm coloured LED street lighting will be used where possible.
- Non-essential lighting will be minimised at night, with lighting designed and managed to reduce light spill into retained habitat areas.
- Screen planting is proposed on the edge of the development footprint and the retained habitat to minimise light spill.
- Prior to any demolition or construction, the Applicant will install noise barriers to reduce noise from construction. All construction noise will be limited to standard daylight working hours 6am–6pm Monday to Friday, 7am–1pm Saturday. No work on Sunday.
- During migration periods for wetland birds the windows of the buildings within the site will be lit up at night to minimise the risk of collision.

The Vegetation Management Plan, Wildlife Hazard Assessment and Wildlife Management Plan will be implemented through Conditions of Consent. These plans will include requirements for monitoring, reporting and adaptive management during construction and operation to ensure biodiversity outcomes are achieved and maintained over time.

Summary

The BDAR prepared for the proposal demonstrates that biodiversity impacts have been avoided and minimised through site selection, design and layout. Approximately 8.80ha of native vegetation. 2.95 ha of the Subject Land fall within Non-Biodiversity Certified land and therefore require assessment in accordance with the Biodiversity Assessment Method (BAM), as well as the calculation and retirement of biodiversity offset credits to address associated impacts. Thirteen (13) Ecosystem Credits are required to be retired to offset the biodiversity impacts of the proposal. Twenty (20) Species Credits are required to be retired to offset the impacts of the proposed development.

No Serious and Irreversible Impacts have been identified. Subject to the implementation of the Vegetation Management Plan, Wildlife Hazard Assessment and Wildlife Management Plan, the proposal is considered acceptable from a biodiversity perspective and consistent with the requirements of the Biodiversity Conservation Act 2016 and the site-specific SEARs.

Vegetation Management Plan

A Vegetation Management Plan (VMP) has been prepared by LandEco and is enclosed in **Appendix FF**. The VMP will govern the site-wide management of vegetation alongside the submitted landscaping plans (**Appendix Y**). It's main objective is to provide a stable watercourse and riparian corridor, which will emulative local native vegetation communities.

The Vegetation Management Plan identifies four 'Management Zones' located within the site as described in section 3.2.9 above. Key management actions are identified for each zone as shown in the table below.

Table 42 Proposed Management Zones

Zone	Area (m ²)	Objective / Aims	Key Management Actions	Number of plants required for assisted regeneration
Management Zone A: The rehabilitation of the River-flat Eucalypt Forest vegetation outside of the Vegetated Riparian Zones within the Subject Property	48 635	- Retain mature canopy. - Restore canopy tree species - Reduce cover of exotic vegetation foliage cover to <1% of zone - Prevent weed encroachment. - Maintain soil stability and prevent erosion.	- Existing native vegetation should be allowed to naturally regenerate. - Where canopy is absent, infill plantings of indigenous canopy species are required. Plantings must not deviate from the list provided in this report. These trees should be of minimum 15L pot size (ideally 45L). - It is expected that the understorey will naturally expand and regenerate. Plantings in these strata will not be necessary. - Exotic vegetation needs to be removed to help the natural regeneration process. Bush regenerators are required to be engaged for this Zone. - At the discretion of the bush regenerator and project ecologist, spray circles may be created to improve the success of plantings	Trees: One plant per ~50m ² Number of trees required: 1 000
Management Zone B The rehabilitation of the freshwater wetland and its vegetation	24,956	- Weed control and monitoring - Removal of old wire fencing inside the freshwater wetland - Area is inclusive of the freshwater wetland, there is very little vegetation cover across the waterbody - Reduce exotic vegetation foliage cover to <1% of zone	- Decrease the prevalence of extant weeds. - Ongoing monitoring for the presence of aquatic weeds. - Plants are not recommended to be planted in and around the wetland. The wetland will naturally regenerate to a self-sustainable state.	NA – regeneration will occur naturally

Zone	Area (m ²)	Objective / Aims	Key Management Actions	Number of plants required for assisted regeneration
			The freshwater wetland has an old fence that runs through the water. This poses a threat to sensitive species via entanglement. This should be removed to remediate the wetland back to a more natural state.	
Management Zone C Planting of trees within the grassland area with the 'Subject Property'	45,247	- No tree species should be planted in this area to reduce the risk of attracting hazardous wildlife. Only Shrubs and groundcover/grasses needs to be planted in this zone. - Spray circles must be created by bush regeneration officers prior to any planting works - Maintenance to keep weeds out of these circles is vital. Regular watering maintenance visits will be required to bed in the plantings. Water crystals need to be placed into the ground at the time of planting. - Revegetation of the entire grassland is not considered feasible in the short term. As such, plantings should only be undertaken within pre-prepared spray circles. Land Eco have conservatively estimated number of plantings based on the provision of 20 spray circles, each with an area of approximately 400m². As such, the total revegetation area is 8,000m². - The circles displayed in Zone C are not prescriptive. Discretion is given to the	- Trees pose a risk of attracting hazardous wildlife. Therefore, a select list of shrubs are recommended - When shrubs/groundcover and grass are planted into this zone large spray circles should be created for planting into. Cenchrus clandestinus often requires multiple spraying events to kill it. Prior planning is required so at least two applications of herbicide occurs prior to planting. This is a requirement for planting survival. - All plantings required for this zone need to go into pre-prepared spray circles.	Shrubs: One plant per ~10m² Groundcovers: Two plants per ~m² Number of shrubs required: 800 Number of Groundcover/Grass required: 16,000

Zone	Area (m ²)	Objective / Aims	Key Management Actions	Number of plants required for assisted regeneration
		bush regenerator in consultation with the project ecologist to determine the best course of action if it is found that a substantial amount of native species are found to occur within the grassland areas. This may involve spot spraying rather than wholesale application of herbicide, or clearing 1m² buffers around individual plantings rather than 400m² spray circles. ▪ Reduce exotic vegetation foliage cover		
Management Zone D Majority of proposed development footprint. Planting is to be in accordance with Landscape Plans (Geoscapes 2026)	82,187	▪ To be managed in accordance with the Landscape Plan (Geoscapes 2026) ▪ To be managed in accordance with APZ requirements (Travers Bushfire & Ecology 2024) ▪ Screen planting is recommended to be erected alongside the development footprint and the retained habitat. This is to reduce light spillage and noise pollution impacts on sensitive biodiversity values.	N/A	N/A
Management Zone E Vegetated Riparian Zone This zone includes all parts within the 'subject property' within the 10m buffer surrounding	38,839	▪ Full-scale revegetation of all structural layers within the Vegetated Riparian Zones surrounding the mapped watercourse that occur within the Subject Land ▪ Intensive weeding effort will be required to reduce weed coverage prior to plantings being installed.	▪ Reduce weed cover to <5% prior to plantings being undertaken ▪ Ensure 80% plantings survive ▪ Where canopy is absent, infill plantings of indigenous canopy species are required. Plantings must not deviate from the list provided in this report. These trees	Trees: One plant per ~100m² Number of trees required: 400 Shrubs: One plant per ~12.5m² Number of shrubs required: 3100

Zone	Area (m²)	Objective / Aims	Key Management Actions	Number of plants required for assisted regeneration
the unnamed first order tributary and within the 40m buffer surrounding South Creek		- Maintenance to keep weeds out of these areas is vital. Regular watering maintenance visits will be required to bed in the plantings. Water crystals need to be placed into the ground at the time of planting. - Given part of this management zone already contains structurally complete remnant vegetation, discretion is given to the bush regeneration contractor in consultation with the project ecologist regarding the distribution of plantings across this zone. - Planting densities have been calculated according to best practice as outlined for the 'middle' zone for River-flat Eucalypt Forest (Sydney Water 2014). Given the substantial amount of existing native vegetation cover within this zone, tree and groundcover density has been halved, while shrub densities have been reduced by 25%. - Utilise weed free mulch and jute matting where necessary following weed removal to minimise erosion and sedimentation issues while plantings are establishing - Plantings should mimic the scheme displayed in Figure 4 of the VMP	should be of minimum 15L pot size (ideally 45L).	Groundcovers: 2 plants per ~m2 Number of shrubs required: 40 000
Management Zone F: To be managed in accordance with	5,315	This Management Zone which lies within the eastern border of the Subject Land is to be managed in accordance	Discretion is given to the Bush Regeneration Contractor in consultation with the Project Ecologist to determine	Groundcovers: 2 plants per ~m2

Zone	Area (m ²)	Objective / Aims	Key Management Actions	Number of plants required for assisted regeneration
APZ requirements (Travers Bushfire & Ecology 2025)		with APZ requirements (Travers Bushfire & Ecology 2025). ▪ Weed control should progressively reduce exotic vegetation foliage cover. ▪ To help prevent the re-establishment and spread of weeds within this area, <i>Juncus usitatus</i> (slender rush) and <i>Carex appressa</i> (sedge) should be densely planted across the zone. Establishing a continuous cover of these locally native species will reduce competition from invasive plants, stabilise the soil surface, and create an effective vegetative buffer that limits future weed encroachment	appropriate weed control scheme and distribution of plantings within this zone. This approach will ensure that management actions do not adversely affect soil stability within the zone, while supporting the establishment of native groundcover vegetation and maintaining APZ compliance.	Number of groundcovers required: 11 000

Source: LandEco (2024)

6.1.11 Soils

The following assessments have been undertaken to inform this SSDA to address the SEARs relating to soils. and are enclosed in the relevant appendices:

- Geotechnical report, prepared by Fortify Geotech (**Appendix V**)
- Salinity Management Plan, prepared by EP Risk (**Appendix BB**)
- Desktop Acid Sulfate Soil Study, prepared by EP Risk (**Appendix H**)
- Groundwater Impact Assessment, prepared by EP Risk (**Appendix W**)
- Civil Infrastructure Report prepared by Arcadis (**Appendix P**)

6.1.11.1 Geotechnical

A geotechnical site investigation was undertaken in October 2023 based on the findings from twenty test pits. The identified subsurface conditions are detailed in the Geotechnical Report and copied in the table below.

Table 43 Subsurface Conditions

Geological Profile	Typical Depth Interval	Description
TOPSOIL FILL/ TOPSOIL	0m/0.25m to 0.1m/0.5m	SILTY SAND, SILTY GRAVELLY SAND, SANDY SILT, SILTY CLAYEY SAND, SANDY SILTY CLAY, CLAYEY SANDY SILT, SILTY SANDY CLAY SILTY SAND, CLAYEY SILTY SAND; fine grained sand, fine to medium grained sand, fine to coarse grained sand, low to medium plasticity clay, brown, trace grey, grass roots at surface, some roots, trace anthropogenic material (plastic), some fine to medium sized gravels, dry, w~PL, loose to medium dense, medium dense, medium dense to dense, firm
FILL	0m/0.45m to 0.45m/1.6m	GRAVELLY SAND, SANDY GRAVEL, GRAVELLY SANDY CLAY, CLAYEY SILTY SAND, SILTY SANDY CLAY; fine to coarse grained sand, fine to medium grained sand, medium to coarse sized gravels, low to medium plasticity clay, medium plasticity clay, dark brown, brown, dark brown to grey, trace orange, red, black, trace fine to coarse sized gravels, trace anthropogenic material (gravels, brick, plastic), dry, w<PL, w~PL firm, medium dense, medium dense to dense. This material was only encountered in test pits TP13, TP14 & TP15.
ALLUVIAL/ RESIDUALSOILS	0.1m/1.6m to 1.7m/>2.0m	SANDY CLAY, CLAY with SAND, SILTY SANDY CLAY, CLAY trace SAND, SILTY CLAYEY GRAVEL, GRAVELLY SILTY CLAY, GRAVELLY SANDY CLAY, SILTY CLAY, SILTY CLAY trace SAND; low to medium plasticity clay, medium plasticity clay, medium to high plasticity clay, fine grained sand, fine to medium grained sand, fine to coarse grained

Geological Profile	Typical Depth Interval	Description
		sand, fine to coarse sized gravels, red to brown, orange to brown, red mottled grey, pale grey mottled red to brown, trace brown, grey mottled red to brown, orange to brown mottled brown and red, grey to brown mottled brown and red to brown, trace red and orange, trace fine to medium sized gravels, trace fine to coarse sized ironstone gravels, w<PL, w~PL, firm to stiff, stiff, stiff to very stiff, very stiff, dense
WEATHERED BEDROCK	Below 1.7m/1.8m	SANDSTONE, SHALE; extremely weathered (XW), excavates as SILTY CLAYEY GRAVEL, GRAVELLY SAND trace CLAY & CLAYEY SANDY GRAVEL. Bedrock was only encountered in test pits TP04, TP08 & TP16.

Source: Fortify Geotech

The depth of topsoil / fill identified in the test pits varied from 0.2 to 1.6 metres. Depth to XW Bedrock was identified in three test pits as 1.7m and 1.8m respectively.

Permanent groundwater was not encountered within the investigation depth, and the encountered soils were mostly dry, dry to moist, less than the plastic limit or near the plastic limit.

The tested soils were found to be clayey and above groundwater. The test results indicated an exposure classification as follows:

- 'Mild' for concrete piles
- 'Moderate' for steel piles, owing to the high electrical conductivity of the soils

Uncontrolled fill was encountered in portions of the site, with depths of up to approximately 1.6 metres identified in a limited number of test pits. Uncontrolled fill is not considered suitable for direct founding of structures. However, this does not represent a constraint to the proposed development, as the fill can be removed and replaced with controlled fill, or footings can be founded within underlying natural soils, weathered bedrock, or newly placed controlled fill, in accordance with the recommendations of the Geotechnical Investigation Report.

All uncontrolled fill within the development footprint will be either removed or remediated prior to construction of footings and slabs. Placement of any controlled fill and verification of founding conditions will be undertaken under Level 1 geotechnical supervision in accordance with AS 3798, with inspection and certification by a suitably qualified geotechnical engineer.

Based on the Fortify Geotech Geotechnical Investigation, the site does not present any geotechnical constraints that would preclude the proposed development, provided that uncontrolled fill is removed or suitably remediated, and that earthworks, footing design, salinity management and construction are undertaken in accordance with the report's recommendations and Level 1 geotechnical supervision requirements.

6.1.11.2 Riparian Soils

The eastern portion of the site adjoins the Wianamatta–South Creek riparian corridor, which comprises alluvial soils associated with floodplain and drainage processes. No bulk earthworks, structural development or excavation is proposed within the South Creek riparian corridor or within riparian land associated with the ENZ-zoned portion of the site.

The proposed development is confined to the western Enterprise-zoned portion of the site, with earthworks setback from South Creek. Riparian soils will be retained in situ and protected during construction through the implementation of erosion and sediment controls, vegetation protection measures and controlled construction boundaries.

The Civil Infrastructure Report notes that a Soil and Water Management Plan (SWMP) will be developed. The approach is described in Civil Report notes that the proposed controls will be designed to prevent sediment transport, erosion and adverse soil impacts during both construction and operation. This includes within the Wianamatta–South Creek corridor.

6.1.11.3 Earthworks and Cut and Fill Volumes

Bulk earthworks are required to create two level development platforms, achieve compliant access from Martin Road and provide flood-resilient finished floor levels. Concept earthworks have been designed to generally follow existing site topography and minimise disturbance beyond the development footprint.

Based on the Civil Infrastructure Report and as detailed in Section 3.2.2 of the EIS the indicative earthworks quantities for the proposal are as follows:

- Cut: -44,225 m³
- Fill: 80,492 m³
- Balance: 36,267 m³
- Topsoil stripping: approximately 22,819 m³

All imported fill will be clean, validated material and placed under Level 1 geotechnical supervision. Earthworks have been designed to minimise export of material, limit disturbance to in-situ soils, and reduce the extent and height of retaining walls where practicable.

6.1.11.4 Connecting with Country

The proposed earthworks and soil management strategy have been informed by the Connecting with Country approach, as articulated in the *Recognise Country: Guidelines for Development in the Aerotropolis* and the project-specific Connecting with Country Framework prepared by Ngurra Advisory in consultation with the Dharug Traditional Custodians, including representatives of the Cabrogal Clan of the Dharug Nation.

Engagement led by Ngurra Advisory included Walks on Country, workshops and ongoing consultation with Traditional Custodians and Knowledge Holders, which informed a Country-led understanding of landform, waterways, soils and cultural landscape values. In particular, Wianamatta (South Creek) was identified as a culturally significant living system that shapes both ecological and cultural relationships across the site and surrounding landscape.

In response, the project team have adopted a landscape-led approach to earthworks that:

- confines bulk earthworks to the Enterprise-zoned portion of the site;
- avoids direct disturbance to riparian soils and land associated with Wianamatta (South Creek);
- follows existing landform and surface drainage patterns where practicable to minimise cut and fill;
- reduces retaining wall heights through the use of landscape batters and graded transitions; and
- stabilises disturbed soils through revegetation using endemic species consistent with Wianamatta Shale Country.

Soil disturbance has been minimised to support long-term land health and reduce erosion, salinity mobilisation and sediment transport to downstream environments. Earthworks design has been integrated with vegetation retention, water-sensitive landscape design and rehabilitation of retained areas, reflecting principles of Caring for Country and shared responsibility for ongoing stewardship.

Ongoing engagement with Traditional Custodians will continue through detailed design and delivery, including the establishment of a First Nations Working Group, to inform the application of Country-led principles to landscape rehabilitation and the management of land adjoining Wianamatta (South Creek).

6.1.11.5 Salinity

The site is located within a high salinity hazard area. Previous studies undertaken included soil sampling (a total of 11 samples were taken, which exceeds the minimum sampling density of 0.5 – 1 sample per hectare for moderately intensive construction) that indicated that the residual clays on the site vary from non-saline to very saline.

The Salinity Management Plan prepared by EP Risk for the site considers that future development is likely to result in the disturbance of potentially saline soils.

Exposing saline / sodic soils to the air in the vicinity of surface drains, basins or sensitive receptors may cause erosion and the release of salinity into the wider environment. Other adverse impacts caused by saline soils include:

- Low permeability of sodic soils may restrict infiltration of surface water leading to ponding and erosion
- The salinity of soils affects the durability and longevity of concrete and steel structures

Excavation has the potential to intercept saline and sodic sub-soils and the removal of native vegetation may lead to increased dryland salinity impacts. Accordingly, a range of mitigation measures are proposed as discussed further below.

6.1.11.6 Acid Sulfate Soils

The Atlas of Australian Acid Sulfate Soil database shows that the site has an extremely low probability (1% – 5%) of Acid Sulfate Soil occurrence (i.e. Class C). Additionally, the site is not located within an Acid Sulfate Soil zone.

Notwithstanding, a preliminary desktop assessment has been undertaken for the site. The assessment identified that:

- the western part of the site (where soils are to be disturbed) is not located within an acid sulfate soil risk zone.
- The western part of the site does not contain geomorphic conditions that are indicative of the presence of acid sulfate soil.

Accordingly, further soil sampling and analytical testing for the presence of acid sulfate soil is not warranted.

Based upon the results of the Acid Sulfate Desktop Study, there is a low risk of acid sulfate soil being present at the Site and therefore an acid sulfate soil management plan is not required.

6.1.11.7 Groundwater & Soils

A Groundwater Impact Assessment prepared by EP Risk (Appendix X) confirms that groundwater levels beneath the development footprint are generally below proposed excavation depths, with localised groundwater interception anticipated only during construction of deep services and the bioretention basin.

Groundwater and soil interactions will be managed through controlled dewatering, groundwater treatment where required, reuse of water for dust suppression where practicable, and implementation of the SWMP to prevent erosion, sediment mobilisation and soil salinisation.

6.1.11.8 Mitigation Measures

To mitigate the potential geotechnical, erosion, and salinity impacts of the development, the following mitigation measures are proposed:

Geotechnical

- All footings are to be inspected by a geotechnical engineer prior to pouring concrete or installing steel reinforcement to verify the actual ground conditions against the proposed design parameters.
- Any topsoil, uncontrolled fill, organic materials, and other unsuitable or deleterious material should be stripped beneath the footprint of the shallow footings.
- All footings will be inspected and approved by an experienced geotechnical engineer to confirm the foundation material and design values, and to ensure the excavations are clean and stable.
- Following excavation to the required level, slab areas on soil will be proof-rolled by a pad foot roller to check for any weak, wet or deforming soils that may require replacement.
- Suitable replacement fill will be compacted in not thicker than 150mm layers to not less than 98%StdMDD.
- Topsoil, silty soil, existing uncontrolled fill material and any medium to high and high plasticity, clayey soils will not be used in controlled fill construction.
- A geotechnical engineer will inspect all cut batters during construction to confirm stability.
- Permanent cut and fill batter slopes will be formed at no steeper than 2(H):1(V) in soil and be protected against erosion by shotcreting, stone pitching or other suitable methods.
- Free-draining granular backfill or synthetic fabric drains will be installed behind all retaining walls. These will connect to weep holes and/or a collector drain, and ultimately to the stormwater system. Granular backfill will be wrapped in a suitable filter fabric to minimise infiltration of silt/clay fines.
- The initial design of any retaining system, or shoring with a single row of anchors or propping, will be predicated on a triangular earth pressure distribution, utilizing the earth pressure coefficients delineated in Table 6 of the Geotechnical Report.
- For construction of any new fill foundation platforms and road subgrades:
 - Areas will be fully stripped of all topsoil, fill material and soft/loose soils. A general stripping depth of 0.2m/1.6m is expected. Stripped foundations will be proof-rolled by a vibratory pad-foot roller of not less than 10 tonne static mass to check for any weak or wet areas that would require replacement. No fill will be placed until a geotechnical engineer has confirmed the suitability of the foundation.
 - Controlled fill comprising suitable site excavated or imported materials of not greater than 75mm maximum particle size, will be compacted in not greater than 150mm layers to not less than 98%SMDD at about OMC
 - Fill placement and control testing be overviewed and certified by a geotechnical engineer.
- All pavement subgrades will be stabilised by overlying with a 300mm thick layer of CBR12 select fill. Stabilised subgrades will then utilise a California Bearing Ratio (CBR) value of 5% for pavement design. Alternatively, subgrades can be cement/lime stabilised, or the upper 300mm of the subgrade removed and replaced with a fill material with a higher CBR value.
- Exposed subgrades will be inspected by a geotechnical engineer to check the recommended design CBR value.
- Drainage will be provided behind all retaining walls and subsoil drains will be installed along the upslope sides of the internal access roads and car parks.

Soil and Water Management Plan

- A project-specific Soil and Water Management Plan (SWMP) will be prepared and implemented prior to the commencement of construction, in accordance with the Western Sydney Aerotropolis DCP Phase 2 and Managing Urban Stormwater: Soils and Construction (the Blue Book). The SWMP will

include staged erosion and sediment controls designed to protect soil resources and downstream environments, including the Wianamatta–South Creek corridor.

Salinity

- Sediment and erosion control measures will be implemented during construction. These will be detailed in a Progressive Erosion and Sediment Control Plan for the site.
- All sediment and erosion controls will be installed prior to the commencement of any works and maintained throughout the duration of construction until disturbed areas have been revegetated / established.
- Groundwater seepage will be collected through localised drainage measures (i.e. sump and pump) and re-infiltrated into the aquifer on site or treated on site and disposed to the sewer under a trade waste agreement.
- Filled areas will be capped with a more permeable material, revegetated and adequate surface drainage infrastructure installed to avoid excessive infiltration, minimise salt leaching and soil erosion.
- Where possible, materials used in the construction of fill embankments will be selected to contain minimal or no salt.
- Where saline soils are exposed in cut or excavated and subsequently placed as filling, a permeable capping layer will be provided.
- Stockpiles will have adequate controls in place for erosion, covering and stabilisation and will be placed sufficiently away from any watercourses.
- Underground water carrying pipes and on-site sewerage systems will be properly installed to eliminate leaks with regular maintenance and checks.
- Groundwater recharge will be minimised by:
 - Directing runoff from paved areas into lined stormwater drains rather than along grassed channels
 - Lining water sensitive urban design water bodies to avoid groundwater recharge
 - Encouraging on site detention of roof runoff and use of low water demanding plants
 - Tree planting proposed on the site
 - Limiting the use of recycled wastewater for the watering of landscaping
- The following will be considered in the design of stormwater and drainage systems on-site:
 - Underground water carrying pipes (including wastewater) and on-site sewerage systems will be properly installed to eliminate leaks with regular maintenance
 - Services will be joint trenched where possible
 - Water supply pipes will be copper or a non-metal acceptable to Sydney Water
 - Sewer pipes will be un-plasticised Poly Vinyl Chloride (PVC) or other material acceptable to Sydney Water
 - The design slope of exposed/open concrete slabs and surrounding areas will be designed to minimise ponding and the potential for increased infiltration
 - Slab, foundations and retaining walls will be designed to allow good drainage / minimise water logging
 - Existing areas of waterlogging and poor drainage will be remedied prior to development construction

- The design and layout of retaining walls, driveways and service connects will reduce cut where possible, and minimises impediment of natural groundwater flows
- Guttering and down pipes will be properly connected and maintained
- Infiltration trenches will be avoided where possible
- Areas of established vegetation will be maintained and protected where practicable.
- Irrigation systems will be properly installed to avoid leakage. The use of smart sprinkler systems will be considered.
- Vegetation will be designed to retain as much of the natural site water balance as possible.
- Salt tolerant plans will be utilised as much as possible.
- Non-saline soils sources from the site or imported will be re-used in landscaped gardens where practicable
- A damp proof course will be constructed beneath any buildings, paths and driveways that are constructed on susceptible or exposed areas
- Salt resistant bricks and construction materials will be used where possible. A corrosion expert will be consulted to assess the compatibility of building materials with soil conditions at the site
- Susceptible construction materials will be avoided as far as possible.
- Appropriate sub-surface drainage that does not divert moisture to road layers will be considered.
- Road materials that are not susceptible to corrosion will be selected

The implementation of the aforementioned measures will mitigate the impact of the identified saline sub-soils during the construction phase of the proposed development.

6.1.12 Waste Management

Salt have prepared a Waste Management Plan (WMP) which is provided at **Appendix II**. The WMP identifies all potential waste likely to be generated by the proposed development during the demolition, construction and operational phases and includes a description of how the waste is to be handled, processed and disposed of, or reused and recycled. The WMP has been prepared in accordance with industry best-practice, the WSADCP and the LDCP2008 where required.

The principal offsite recyclers that can be used for the project include:

- Cleanaway Lucas Heights Resource Recovery Park
- Cleanaway Auburn Resource Recovery Centre

6.1.12.1 Demolition and Construction Waste Management

Noting the general undeveloped nature of the site, demolition waste is anticipated to be minimal as outlined in **Table 44** below.

Table 44 Estimated Demolition Waste Generation Volumes and Management Options

Type of Waste Generated	NSW EPA Waste Classification	Most to Least Favourable			Specify Method of On-site Reuse, Contractor and Recycling Outlet and/or Waste Depot to be used
		Reuse Estimate Volume – Weight (t)	Recycle Estimate Volume – Weight (t)	Disposal Estimate Volume – Weight (t)	
Green Waste	General Solid Waste (Putrescible)	Minimal	Minimal		Separated and some chipped for landscaping.

Type of Waste Generated	NSW EPA Waste Classification	Most to Least Favourable			Specify Method of On-site Reuse, Contractor and Recycling Outlet and/or Waste Depot to be used
		Reuse Estimate Volume – Weight (t)	Recycle Estimate Volume – Weight (t)	Disposal Estimate Volume – Weight (t)	
					Delivered to offsite recycler listed above.
General Waste	General Solid Waste (Non-Putrescible) General Solid Waste (Putrescible)	-	Minimal	Minimal	Garbage may be generated on the site during any excavation work. Any garbage generated shall be sorted and stored on-site in general waste skip bins as deemed necessary.
Excavated Material	Pre-Classified General Solid Waste (Putrescible) or (Non-Putrescible) Requires EPA Testing	Excavated materials are to be reused on-site as fill subject to a Virgin Excavated Natural Material (VENM) assessment. Any unused clean concrete (without the presence of metal or other materials), clay bricks, asphalt (ripped and profiled) can be recycled at Cleanaway Lucas Heights Resource Recovery Park.			
Hazardous / Special Waste	Should any hazardous materials be present at the site, it must be disposed of in accordance with the appropriate guidelines. Veolia’s Wetherill Park Resource Recovery Facility currently accepts asbestos on the condition that a 24-hour notice is provided.				

Source: Salt, 2024

In relation to construction waste, the assessment below has been prepared to achieve an 80% recycling target for construction waste as set by the NSW EPA's *Waste Avoidance and Resource Recovery Strategy 2014-2021*. The table below considers the estimated construction waste for the proposed development.

Table 45 Estimated Construction Waste Generation Volumes and Management Options

Type of Waste Generated	NSW EPA Waste Classification	Most to Least Favourable			Specify Method of On-site Reuse, Contractor and Recycling Outlet
		Reuse Estimate Volume – Weight (t)	Recycle Estimate Volume – Weight (t)	Disposal Estimate Volume – Weight (t)	
Timber	General Solid Waste (Non-Putrescible)	1.9	7.8	-	Delivered to the offsite recycler listed above. Chipped remainder may be used in landscaping.
Concrete	General Solid Waste (Non-Putrescible)	66.0	16.4	-	To be used as handstand during construction then as base under pavements.

Type of Waste Generated	NSW EPA Waste Classification	Most to Least Favourable			Specify Method of On-site Reuse, Contractor and Recycling Outlet
		Reuse Estimate Volume – Weight (t)	Recycle Estimate Volume – Weight (t)	Disposal Estimate Volume – Weight (t)	
					Any unused concrete would be returned to batch plant for reuse.
Bricks	General Solid Waste (Non-Putrescible)	51.6	12.9	-	Clean and reuse lime mortar bricks for footings. Delivered to the offsite recycler listed above. Note: it should not be mixed with other materials from the demolition and construction waste and reinforced concrete.
Gyprock	General Solid Waste (Non-Putrescible)	-	14.1	3.5	Delivered to an offsite recycler or disposed of in a designated general waste skip. Should asbestos be present, the waste must be removed and disposed of in accordance with the requirements of Work Cover.
Sand/Soil	General Solid Waste (Non-Putrescible) General Solid Waste (Putrescible)	-	150.3	37.5	Delivered to the offsite recycler listed above.
Metal	General Solid Waste (Non-Putrescible)	-	18.8	4.7	Clean metal (i.e. without presence of other materials) will be delivered to the offsite recycler listed above. Any contaminated metal should be separated to be landfilled.

Type of Waste Generated	NSW EPA Waste Classification	Most to Least Favourable			Specify Method of On-site Reuse, Contractor and Recycling Outlet
		Reuse Estimate Volume – Weight (t)	Recycle Estimate Volume – Weight (t)	Disposal Estimate Volume – Weight (t)	
General Waste (incl. Residual Waste + Dust)	General Solid Waste (Non-Putrescible) General Solid Waste (Putrescible)	-	Minimal	Minimal	Disposed into a general waste skip.
Other	Pre-Classified General Solid Waste (Non-Putrescible)	-	15.6	3.9	Sorted accordingly based on recycling potential of each material.

Source: Salt, 2024

6.1.12.2 Operational Waste Management

The anticipated operational waste generated by the development has been calculated based on the waste generation rates set out below. Due to the absence of rates within the WSA DCP 2022 and the Liverpool DCP, the applied rates have been derived from 'Sustainability Victoria Better Practice Guide for Waste Management and Recycling in Multiunit Developments' (2019) and the 'NSW EPA Better Practice guidelines for waste management and recycling in commercial and industrial facilities' (for the office floorspace):

Table 46 Waste generation rates

Use	Garbage (L/100m ² /week)	Commingled Recycling (L/100m ² /week)
Warehouse	70L	70L
Office	56L	42L

Source: Salt

Based on the above rates it is anticipated that the proposed development will generate the following quantities of waste during its

Table 47 Anticipated waste generation

Use	Area	Waste Per Week	
		Garbage	Recycling
Warehouse 1			
Warehouse	16,465 sq.m	11,525 L	11,525 L
Office	600 sq.m	336 L	252 L
Total Waste Generated per week		11,861 L	11,777 L

Use	Area	Waste Per Week	
		Garbage	Recycling
Warehouse 2			
Warehouse	18,564 sq.m	12,995 L	12,995 L
Office	1,104 sq.m	618 L	464 L
Total Waste Generated per week		13,613 L	13,459 L

Source: Salt

Organic waste generation volumes are anticipated to be minimal. Any organic waste will be disposed of into the general waste bins. An additional skip may be required for Warehouse 1 to manage metal offcuts and filings.

Waste will be sorted on site by staff and cleaners as appropriate into the following streams: garbage (general waste); commingled recycling; bulky goods / hard waste and hazardous waste.

Plastic lined bins for the temporary holding of garbage will be provided within the warehouses and offices. Waste collected will be transferred (3 times per day) into larger 4.5m³ bins located within the external bin storage areas. A similar arrangement will be implemented for commingled recycling. All bulky goods or hard waste will be managed independently by the warehouse tenants and temporarily stored within the respective buildings prior to collection.

Two 4.5m³ bins will be provided in the external bin storage area for Warehouse 1 (one for garbage and one for recycled waste). Waste collections for Warehouse 1 will take place three times per week. Additional space has also been allocated within Warehouse 1's waste storage area for a 4.5m³ skip / waste container for the collection of any metal profiling, offcuts and filings associated with the steel manufacturing component of the development.

The bin storage area for Warehouse two will include a total of four 4.5m³ bins (two for garbage and two for recycling). Waste collection will take place twice per week.

In both Lot 1 and Lot 2, waste collection vehicles will enter and exit the site in forward gear via Martin Road.

6.1.12.3 Mitigation

The following mitigation measures will be implemented:

- Bin storage areas will be naturally ventilated
- Appropriately drained wash down areas will be provided in the waste storage areas and the bins regularly cleaned. The wash down areas will discharge to a litter trap. Alternatively, a third-party washing service will be engaged and suppliers will retain all waste water within their washing apparatus.
- Building management and cleaners will be responsible for ensuring the prevention of litter dispersion throughout the site. This will be implemented by preventing overfilling of bins; requiring waste contractors to remove any spillages that occur during collections, and educating anyone found responsible for inappropriate waste disposal of correct waste disposal techniques.
- All waste areas will be designed to meet EPA, Building Code of Australia and Australian Standard acoustic requirements as appropriate
- Waste contractors will be required to minimise noise disturbance by ensuring compaction is only carried out while moving, bottles are not broken at the point of collection, and noisy verbal communication is avoided.

- All waste areas will comply with Australian Standard AS1428:1:2009.

6.1.13 Infrastructure Requirements

A Civil Infrastructure Report has been prepared by Arcadis (refer to **Appendix P**) to detail the civil infrastructure requirements for the proposed development in accordance with the SEARS, the staging and delivery of these including anticipated funding arrangement is detailed within this section.

The assessment of the infrastructure requirements for this has been undertaken using information obtained from Before You Dig Australia (BYDA), service provider records and site inspections, discussions with Council, Sydney Water and Transport for NSW as documented in the Civil Infrastructure Report and outlined in the following sections.

Existing potable water, electrical, telecommunications and gas infrastructure is located within or adjacent to Martin Road. There is no existing wastewater infrastructure in the vicinity of the site. Council is responsible for delivering the local road network in accordance with its local contributions plan. Sydney Water is responsible for delivering regional water infrastructure including the stormwater infrastructure indicated for this site within the finalised Aerotropolis Stormwater Scheme Plan.

The proposed development does not require the relocation or diversion of any existing utility infrastructure or service provider assets. Construction and operation of the development is not expected to adversely impact existing utilities, subject to standard asset protection measures being implemented during construction in accordance with the requirements of the relevant service providers.

6.1.13.1 Existing and Planned Infrastructure

Easements and Constraints

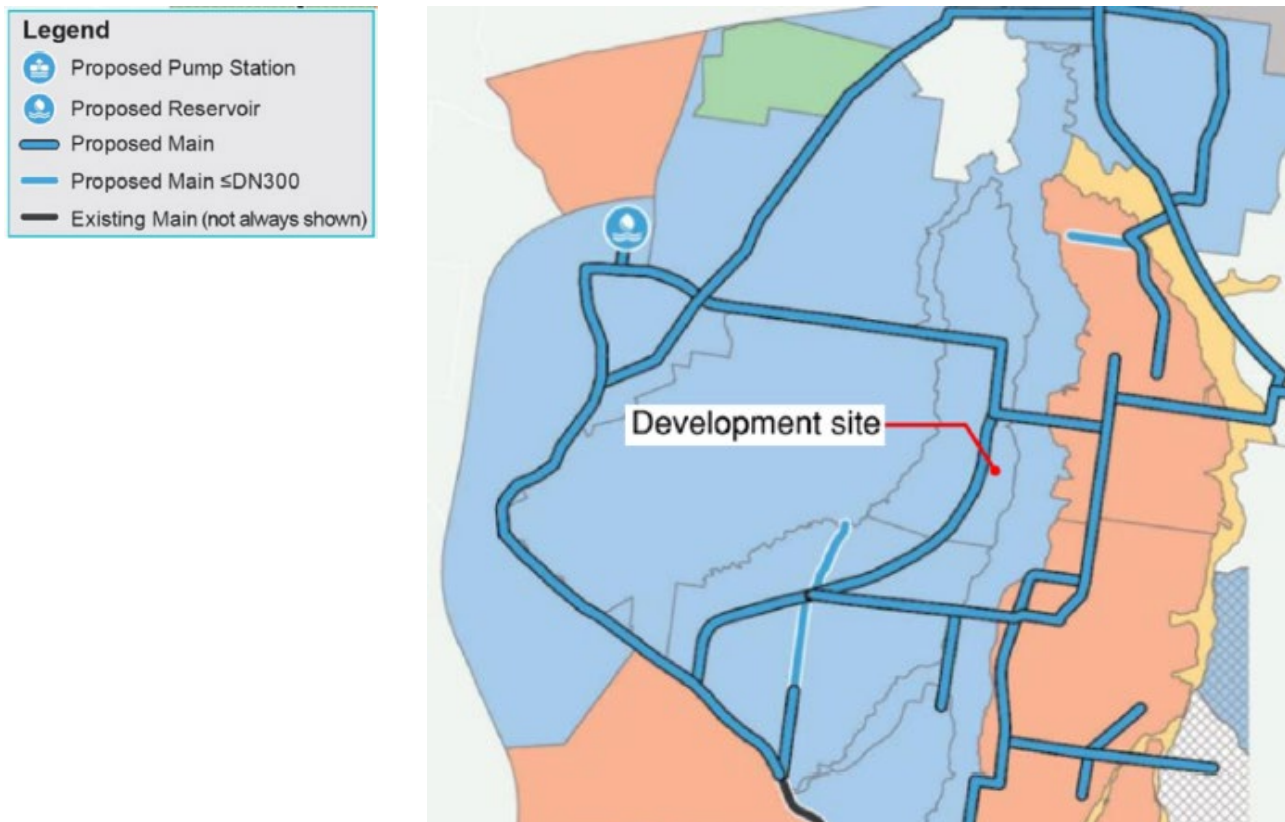
As detailed in Section 2 of the Civil Infrastructure Report and Section 1.6 of this EIS there is no existing infrastructure or easements on or adjacent to the site that will be impacted by the development.

Potable Water

A potable water main (100mm diameter) is located on the western side of Martin Road, which supplies rural drinking water to the area.

Trunk infrastructure to service development in the WSA will be delivered by Sydney Water. It is anticipated that several water mains will be delivered within close proximity to the site as shown in Sydney Water's WSA (Initial Precincts) Stormwater and Water Cycle Management Study (2021) and copied below.

Figure 45 Proposed Sydney Water drinking water infrastructure



Source: Arcadis 2024

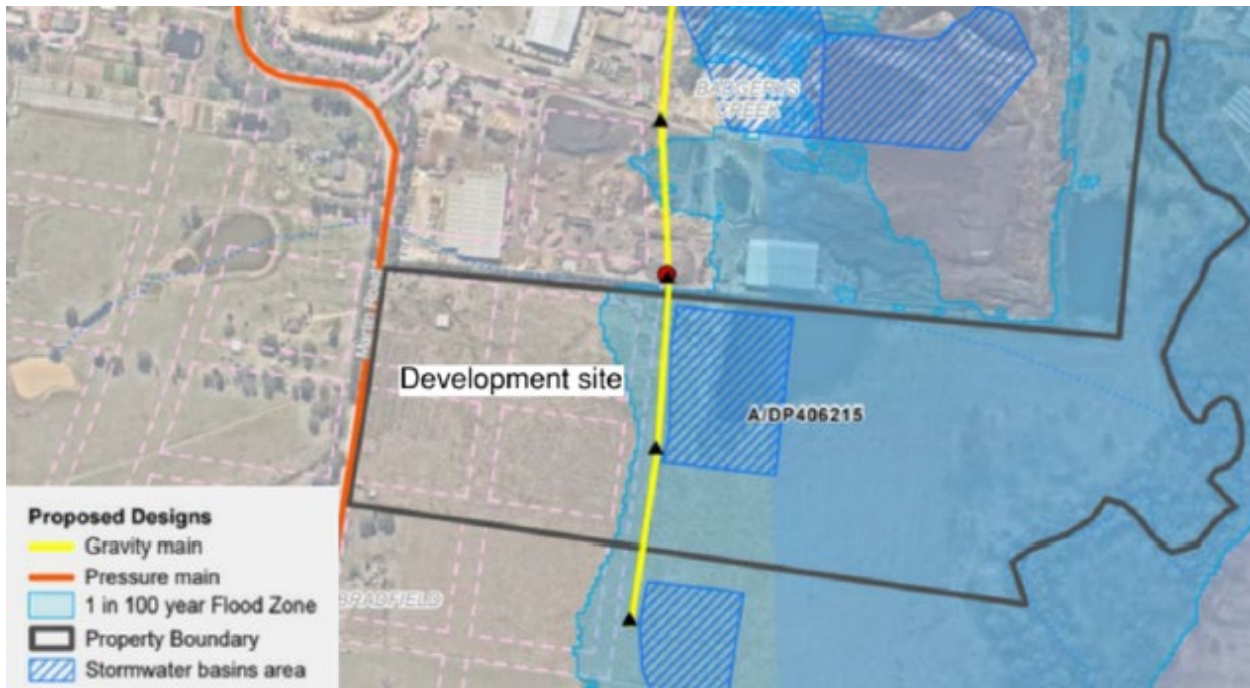
Wastewater

There are no wastewater services within the immediate vicinity of the site. However, the site is located within Sydney Water's Badgerys Creek Growth Area and is in the proposed South Creek wastewater catchment. A new South Creek wastewater network will be delivered by Sydney Water to support development in the area.

The applicant has been advised by Sydney Water that Stage 1 of the South Creek wastewater network will include a gravity trunk wastewater carrier located along the western side of South Creek, which will transfer flows to the proposed Upper South Creek Advanced Wastewater Recycling Centre via a pumping station. It is understood that the trunk main will be delivered by 2026.

The proposed alignment of the trunk main is shown below.

Figure 46 Sydney Water future wastewater infrastructure



Source: Arcadis 2024

Electrical

Existing above-ground electrical infrastructure is located adjacent to the site along Martin Road.

Telecommunications

A combination of aerial and in-ground telecommunications infrastructure is located adjacent to the site along Martin Road.

Gas

An existing high pressure gas main is located beneath Martin Road.

6.1.13.2 Augmentation

Potable Water

A connection will be provided from the proposed development to the future potable water mains detailed above.

The Applicant will continue to liaise with Sydney Water regarding the anticipated delivery of the trunk potable water infrastructure in the Badgerys Creek precinct. Should an 'interim' solution be required (i.e. if occupation of the proposed development occurs prior to completion of the trunk potable water infrastructure), the design and extent of this will be agreed with Sydney Water.

Wastewater

A connection will be provided from the proposed development to the future wastewater mains to be delivered by Sydney Water. It is anticipated that the proposed wastewater infrastructure will be constructed and operational prior to the first occupation of the development.

The Applicant will continue to liaise with Sydney Water regarding the delivery of this wastewater infrastructure and the potential future requirement for any 'interim' arrangements should construction of it be delayed.

Recycled water

Non-potable water for the proposed development will primarily be sourced from the rainwater tanks. These will collect rainwater runoff from the buildings and be recycled for use in toilet flushing and landscape irrigation.

Non-potable water supply will also be provided to the site from the proposed WSA reticulated recycled water network, which will be supplied by the South Creek Advanced Water Recycling Centre and expected to be operational from 2026/2027.

Electricity

Electricity to the proposed development will be provided via a connection to the existing electrical infrastructure located along Martin Road. It is anticipated that two new substations will be required to service the development, one for each proposed warehouse.

These substations are anticipated to be kiosk-type substations located wholly within the site boundary, with final sizing and configuration subject to detailed design and confirmation by Endeavour Energy. No electrical switchyard or high-voltage infrastructure is proposed as part of the development. Indicative substation locations are shown on the civil engineering drawings included in Appendix P.

A technical review enquiry is being lodged with Endeavour Energy to understand if there is sufficient capacity in the existing network to supply the proposed development.

Telecommunications

An underground connection will be provided from the proposed development to the existing telecommunications infrastructure located beneath Martin Road. A technical review enquiry has been submitted to determine the current capacity within the existing telecommunications infrastructure.

Gas

Gas will only be provided to the warehouses if specifically requested by a future tenant. It is anticipated that a connection would be installed to the existing pipeline located beneath Martin Road. Consultations with Jemena have commenced and they have confirmed the presence of a secondary high pressure gas main along Martin Road.

Conclusion

Based on the Civil Infrastructure Report and feasibility advice received from Sydney Water (Civil Report Appendix F), satisfactory arrangements have been made to service the proposed development with potable water, wastewater, recycled water, electricity, telecommunications and stormwater.

Where trunk infrastructure is to be delivered by Sydney Water as part of the Western Sydney Aerotropolis Growth Area, interim servicing solutions have been identified and can be implemented if required to support initial occupation. The development can operate independently of future regional infrastructure during interim periods, with stormwater quality and quantity targets achieved on site in accordance with the Aerotropolis DCP and the Technical guidance for achieving Wianamatta–South Creek stormwater management targets

6.1.13.3 Road Network

The Aerotropolis Sector Plan (published February 2025) identifies the key road network upgrades proposed to support development within the Aerotropolis and anticipated timeframes for delivery. The proposed upgrades, which are to be delivered by others, will include (but not be limited to):

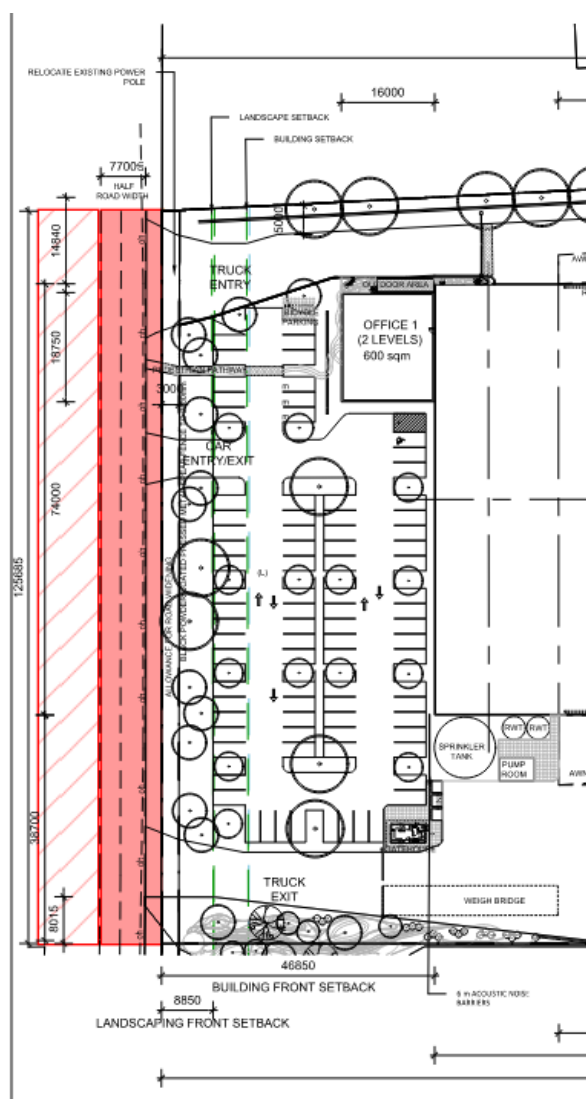
- Eastern Ring Road – Construction from 2040
- Elizabeth Drive East (Badgerys Creek Road to Devonshire Road) Stage 1 – construction completed by 2030

- Elizabeth Drive East (other sections) – interim and safety access works complete by 2027. Major upgrade construction from 2040
- Elizabeth Drive West – interim and safety access works (Luddenham Road intersection). Construction of major upgrades from 2040.

These proposed upgrades and new roads will support early airport operations and initial development in the WSA and create safe and reliable access to the wider road network.

As detailed within the Civil Infrastructure Report the applicant proposes to undertake road upgrade works along the full extent of the Site's frontage on Martin Road to half of the road width, being the portion reasonably attributable to the development (refer **Figure 48**). The upgrade to the site frontage will be consistent with the Collector Road cross sections within the DCP. The applicant is also undertaking a pavement impact assessment which will be submitted as part of the Response to Submissions stage. This assessment will identify the extent of any interim pavement upgrades along Martin Road that would be required to maintain road safety if any upgrades are indeed identified to be required.

Figure 47 Proposed Half Road Upgrade



Source: Arcadis

It is expected that broader road network upgrades will be undertaken and funded by Council, TfNSW and/or other developers in accordance with the relevant contributions plans.

Notwithstanding the above, as detailed in the Transport Impact Assessment a mid-block assessment has confirmed additional lane upgrades to Martin Road would not be required from a traffic volume perspective to support day-one operations of the proposal.

6.1.13.4 Coordination, funding and delivery of infrastructure

Delivery of infrastructure required to service the development will be coordinated between the proponent and relevant service providers, as detailed in the Civil Infrastructure Report. Trunk potable water, wastewater and recycled water and stormwater infrastructure will be delivered by Sydney Water, with developers contributing via applicable developer servicing plan (DSP) charges. As noted, discussions are ongoing with Sydney Water in relation to the design and delivery of the stormwater infrastructure identified for the site however at this stage, the intention is to rely on interim stormwater solutions until such time that Sydney Water has delivered the regional stormwater infrastructure on the site.

Feasibility advice has been received from Sydney Water confirming the proposed servicing strategy for potable water, wastewater and recycled water within the South Creek Growth Area. This advice, including servicing constraints and indicative delivery timeframes, is included in Appendix F of the Civil Infrastructure Report. Ongoing consultation with Sydney Water will continue through detailed design and construction.

Lead-in services within the site boundary will be delivered by the proponent in accordance with service provider requirements. Timing of infrastructure delivery has been aligned with anticipated development staging which is anticipated to be complete by late 2027. Contingency/interim arrangements have been identified where regional infrastructure delivery may occur after initial occupation. Ongoing management and maintenance of privately owned infrastructure will be the responsibility of the proponent.

Road infrastructure will be funded by development contributions levied on the site and other development or delivered as works in kind. As noted, the applicant will undertake a half road upgrade to its frontage to Collector Road standard. It is expected that this will be delivered by late 2027 in line with the anticipated completion date. The applicant will continue to engage with Council in relation to appropriate arrangements for the funding of this half road upgrade noting that the Collector Road is infrastructure identified in its 7.12 Contributions Plan.

As outlined throughout this EIS, the development has been sited to allow for the future delivery of the Park Edge Street. However, the proposal does not include construction of this infrastructure, as it is not required to provide legal access to the development, is not identified within Council's contributions plan, and relies on connections from Martin Road through adjoining sites that are intended to be delivered by Council as part of its 7.12 Contributions Plan. Should Council consider that this connection is required in the future, it would be progressed separately through its own planning and delivery processes. The development will be accessed from Martin Road. Access for Sydney Water to maintain its regional infrastructure will be provided via a private access driveway located at the rear of the warehouse area, which will also enable workers to access the ENZ areas at the rear of the site.

Table 48 summarises the staging, delivery and funding responsibilities for infrastructure required to service the proposed development at 230 Martin Road. The table distinguishes between infrastructure delivered by the proponent and regional and local infrastructure to be delivered by State agencies or Council under separate planning, funding and delivery processes. Indicative timeframes are drawn from the Aerotropolis Sector Plan (February 2025), Sydney Water feasibility advice (December 2023) and the Civil Infrastructure Report (Appendix P), noting that delivery of regional infrastructure remains subject to separate approvals and funding programs. The proposed development has been designed to operate independently during interim periods and does not preclude the future delivery of regional infrastructure.

Table 48 – Infrastructure Staging, Delivery and Funding

Infrastructure Item	Description	Category	Delivery Responsibility	Delivery Mechanism	Indicative Timing	EIS / Report Reference
Potable Water – Trunk Infrastructure	Trunk potable water infrastructure to service development within the Western Sydney Aerotropolis	Utilities	Sydney Water	Developer Servicing Plan (DSP) charges	Subject to Sydney Water staging.	Civil Infrastructure Report (Appendix P), Section 9.2; EIS Section 6.1.13.1; Sydney Water Feasibility Advice (Appendix F, Dec 2023)
Potable Water – Site Connection	Connection from the development to future trunk potable water mains	Utilities	Proponent	Section 73 Certificate / Developer Works	Prior to occupation. Interim solutions to be discussed with Sydney Water if occupation of the proposed development occurs prior to completion of the trunk potable water infrastructure	Civil Infrastructure Report (Appendix P), Section 9.2
Wastewater – South Creek Trunk Sewer	Gravity trunk wastewater carrier along western side of South Creek connecting to Upper South Creek AWRC	Utilities	Sydney Water	Developer Servicing Plan (DSP) charges	2026–2028 (indicative)	Civil Infrastructure Report (Appendix P), Section 9.3; Sydney Water Feasibility Advice (Appendix F, Dec 2023); EIS Section 6.1.13.1
Wastewater – Site Connection	Connection from the development to future wastewater trunk network	Utilities	Proponent	Section 73 Certificate / Developer Works	Prior to occupation	Civil Infrastructure Report (Appendix P), Section 9.3
Interim Wastewater Servicing	Interim wastewater servicing solution (if required prior to trunk sewer delivery)	Utilities	Proponent	Agreement with Sydney Water	If required	Civil Infrastructure Report (Appendix P), Section 9.3
Recycled Water – Regional Network	Reticulated recycled water network supplied from South Creek Advanced Water Recycling Centre	Utilities	Sydney Water	DSP charges	2026–2027 (indicative)	Civil Infrastructure Report (Appendix P), Section 9.4; Sydney Water Feasibility Advice (Appendix F)

Infrastructure Item	Description	Category	Delivery Responsibility	Delivery Mechanism	Indicative Timing	EIS / Report Reference
Recycled Water – Site Provision	Dual plumbing and site provision for future recycled water connection	Utilities	Proponent	Conditions of Consent	Prior to occupation	Civil Infrastructure Report (Appendix P), Section 9.4
Stormwater – On-site Infrastructure	On-site detention, WSUD and stormwater quality treatment measures (interim arrangement)	Stormwater	Proponent	Conditions of Consent	Prior to occupation	Civil Infrastructure Report (Appendix P), Sections 6–7; EIS Sections 3.2.10 & 6.1.6
Stormwater – Regional Scheme	Regional stormwater basin, trunk drainage corridors and harvesting mains	Stormwater	Sydney Water	Regional Stormwater Scheme / DSP	Timing subject to Sydney Water program	Aerotropolis Precinct Plan; Civil Infrastructure Report (Appendix P), Section 7.5; Figure 38 (Sydney Water, March 2026)
Martin Road – Site Frontage Upgrade	Upgrade of the site frontage to accommodate future Collector Road cross-section	Transport	Proponent	Works-in-kind / offset under S7.12 Plan	By late 2027 (indicative)	Civil Infrastructure Report (Appendix P); EIS Sections 3.2.3 & 6.1.13.3
Martin Road – Collector Road Section	Martin Road identified as future Collector Road within the Aerotropolis	Transport	Liverpool City Council / Developers	Contributions-funded road upgrades	Staged	Aerotropolis Precinct Plan; Aerotropolis Sector Plan (Feb 2025); EIS Section 6.1.13.3
Elizabeth Drive Upgrades	Upgrades to Elizabeth Drive to support Aerotropolis growth	Transport	TfNSW	State-funded works	Stage 1 East by 2030; interim works by 2027	Aerotropolis Sector Plan (Feb 2025); Table 7 (Cumulative Developments)
Eastern Ring Road (ERR)	Future regional road providing primary freight and public transport access	Transport	TfNSW	State-led planning and delivery	Construction from 2040	Aerotropolis Sector Plan (Feb 2025); EIS Sections 2.1 & 6.1.13.3

Infrastructure Item	Description	Category	Delivery Responsibility	Delivery Mechanism	Indicative Timing	EIS / Report Reference
Park Edge Street (Future)	Future local road shown in Precinct Plan; corridor safeguarded only	Transport	Liverpool City Council	Separate planning and delivery process	Not programmed	EIS Section 3.2.6; EIS Section 6.1.14
Riparian Street (Future)	Future local road and trunk drainage corridor north of the site	Transport / Stormwater	Liverpool City Council / Sydney Water	S7.12 contributions and Sydney Water works	Not programmed	Aerotropolis Precinct Plan; Sydney Water Scheme Plans; EIS Sections 2.1 & 6.1.6.4
Electricity Supply	Connection to existing electrical infrastructure in Martin Road.	Utilities	Endeavour Energy	Enquiry lodged to determine if there is sufficient capacity in the existing network	TBC	Civil Infrastructure Report (Appendix P), Section 9.5
Electrical Substations	Two kiosk-type substations within the site	Utilities	Proponent	Agreement with Endeavour Energy	Prior to occupation	Civil Infrastructure Report (Appendix P), Section 9.5
Telecommunications	Connection to existing telecommunications infrastructure in Martin Road	Utilities	Proponent	Service provider agreement	Prior to occupation	Civil Infrastructure Report (Appendix P), Section 9.6
Gas Supply (Optional)	Connection to existing high-pressure gas main (if required)	Utilities	Proponent	Agreement with Jemena	If required by future tenant	Civil Infrastructure Report (Appendix P), Section 9.7

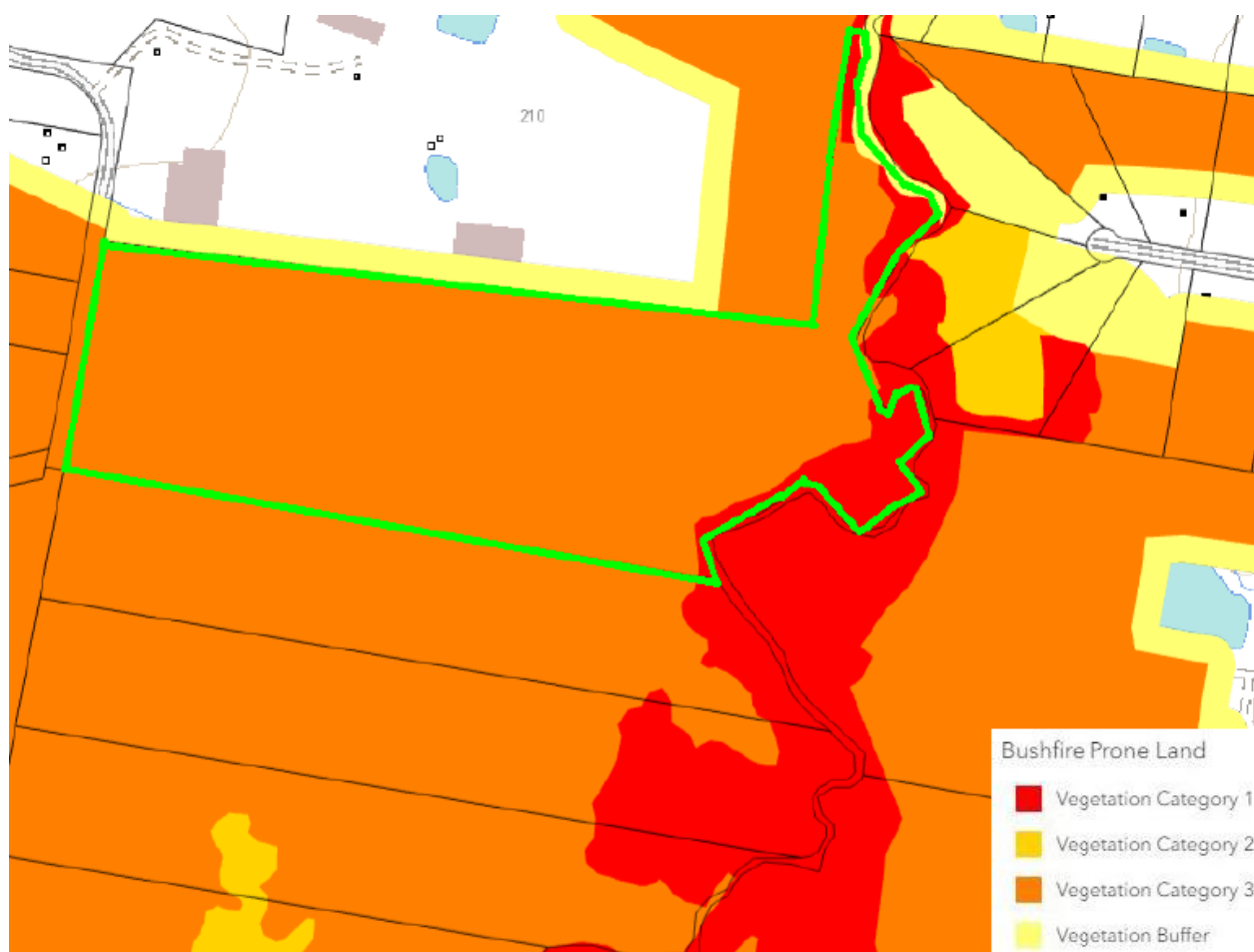
6.1.14 Bushfire

The site is located within Bushfire prone land. Accordingly, a Bushfire Protection Assessment has been prepared by Travers Bushfire & Ecology to support the proposed development (please refer to **Appendix N**).

An extract of the NSW e-spatial viewer bushfire prone land map is set out below. The map shows that:

- The majority of the site comprises Vegetation Category 3 land. This includes all of the land in which the proposed warehouses and associated hardstand will be located
- Part of the site located near its interface with South Creek comprises Vegetation Category 1 land.
- A very small part of the site located along the eastern boundary comprises 'Vegetation Buffer' land

Figure 48 Bushfire Prone Land Map



Source: Travers Bushfire and Ecology (2024)

6.1.14.1 Findings

The proposed development will comprise a 'commercial and industrial development' for the purposes of the Planning for Bush Fire Protection 2019 guidelines (PBP). For this type of development, the NSW Rural Fire Service requires that development applications satisfy the aims and objectives of the PBP, propose an appropriate combination of bushfire protection measures and provide evidence that the intent of each measure can be satisfied.

As detailed further below, several measures are proposed to mitigate the risk of bushfire to the proposed development. The proposed measures include (but are not limited to) the provision of Asset Protection Zones (APZs) in accordance with the minimum setbacks outlined within PBP 2019.

The site and its surrounds contain several environmental and heritage features that have the potential to constrain the implementation of Asset Protection Zone's (APZs) within a site. These include:

- One known significant Aboriginal Site is located within a 50m buffered zone from the site boundary.
- Two watercourses are located in proximity to the site – South Creek is adjacent to the eastern boundary of the site and an unidentified stream is located along the northern boundary.
- A threatened Ecological Community (River-Flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South East Corner bioregions) is located within a 50m buffered zone of the site boundaries
- Two Threatened Species (comprising Grey-headed Flying-fox and Southern Myotis) were identified within a 50m buffered zone of the site boundaries.

The significant Aboriginal site, threatened ecological community and threatened species, as well as the South Creek watercourse are located a considerable distance east of the proposed development footprint and are therefore not considered a constraint to implementing APZs within the site.

The unidentified stream located along the site's northern boundary may be considered an APZ constraint. Vegetation retention zones that are 10 metres in width are required on both sides of the watercourse in accordance with the requirements of the Water Management Act. Further assessment is recommended before any construction or clearing for APZ purposes takes place.

Bushfire threat assessment

An assessment of the potential hazardous vegetation and the effective slope within the site was undertaken to assess the bushfire threat to the proposed development and the required width of the APZs. The table below summarises the vegetation located within 140 metres of the proposed building footprints that pose a bushfire threat to the development.

Table 49 Vegetation

Vegetation community	Vegetation formation	Vegetation classification	PBP Classification	Acceptable fuel loads surface / elevated (t/ha) (PBP 2019)
Cumberland Shale Plains Woodland (PCT 3320)	Grassy Woodlands	Coastal Valley Grassy Woodland	Grassy Woodland	10.5/ 20.2
Cumberland Red Gum Riverflat Forest (PCT 4025)	Forested Wetland	Coastal Floodplain Wetland	Forested Wetland	8.0/ 15.1
Unmanaged Grassland	Grassland			6.0/ 6.0

Source: Travers Bushfire and Ecology (2024)

The proposed landscape design prepared by Geoscapes, demonstrates environmental sustainability and aesthetic enhancement. The plans show the retention of existing grassland and vegetation, including the central dam. The car park area is proposed to be supplemented by shade through the delivery of trees, as well as the front setback. Clusters of tree planting has been designed in accordance with bushfire guidelines. The bushfire attack assessment for the site is set out in the table below. The minimum APZ setback required for a non-residential building is a rating of BAL-29, which ensures that buildings are not exposed to a radiant heat flux exceeding 29Kw/m². The APZs are required to be wholly within the site's boundaries unless structures or features of a landscape are considered permanent and act as barriers against fire spread.

Table 50 Bushfire Attack Assessment

Aspect	Vegetation Formation	Effective Slope	Recommended APZ required	APZ provided	Comment
North	Managed Land*	Not applicable			
East	Grassy Woodland	0–5 degrees downslope	16m	48m	The APZ provided includes the future Park Edge Street and car park area
South	Grassland	Flat/upslope	10m	10m	The APZ provided includes a 10 metre setback zone from the edge of Warehouse 2 and the site's southern boundary
West	Grassy Woodland	Flat/upslope	12m	43m	The APZ provided includes the Martin Road reserve and car park areas.

Source: Travers Bushfire (2024)

The site to north of the proposed development is owned and operated by Australian Native Landscapes, which supplies landscaping and building materials. This site lacks vegetation and has several warehouse structures and stockpiles of materials, which are likely to include flammable organic mulches and soils. The PBP stipulates that commercial nurseries can be excluded as a low vegetation threat and hence this site is considered managed-land.

The table above shows that all APZs can be contained wholly within the site boundaries. The APZs will ensure that the buildings are not exposed to a radiant heat flux exceeding 29 kW/m². Additionally, all APZs are located on lands with a slope less than 18 degrees, which complies with the 'acceptable solutions' set out in the PBP.

Access for firefighting operations

The proposed development will comply with the acceptable solutions outlined in PBP 2019 for access.

Water supplies

The proposed development will comply with the acceptable solutions for water supply outlined in PBP 2019.

Gas

The proposed development will comply with the acceptable solutions for gas outlined in PBP 2019.

Electricity

The proposed development will comply with the acceptable solutions for electricity outlined in PBP 2019.

Construction standards

The proposed development will comply with the acceptable solutions for construction standards outlined in PBP 2019. Ember protection will be provided for the buildings and non-combustible security fencing used within the site.

Issues specific to buildings of Class 5 to 8 under the National Construction Code (NCC).

Whilst bush fire is not captured in the NCC for class 5-8 buildings, several objectives are applied under the PBP in relation to access, water supply and services, and emergency and evacuation planning. The proposal demonstrates compliance with the specific objectives and the proposed performance solutions.

6.1.14.2 Mitigation Measures

In recognition of the bushfire risk posed to the site by the surrounding bushland, the following mitigation measures are proposed:

- Asset Protection Zones will be provided in accordance with the minimum setbacks outlined in Planning for Bushfire Protection 2019. The APZs are incorporated into the design of the proposed development and located entirely within the site
- Building construction will be undertaken in accordance with the requirements of the National Construction Code (NCC) and ember protection in accordance with section 7.5 of the PBP. The building is to be constructed in accordance with Type A construction as a large isolated building under the NCC.
- Access and water and electricity supply will be provided in accordance with the acceptable solutions outlined in PBP 2019. Gas will only be supplied to the site is required by a future tenant.
- All site fencing will be made of non-combustible material
- A bushfire emergency / evacuation plan will be developed and implemented prior to the issues of an Occupation Certificate. This requirement can be addressed by conditions of consent.

6.1.15 Social Impact

A Social Impact Assessment (SIA) (**Appendix JJ**) has been prepared by HillPDA Consulting to evaluate the proposal in accordance with the Department's Social Impact Assessment Guideline. This involves the scoping and initial assessment of the proposal and site, preparing a social baseline for the locality, completing an analysis and assessment of impacts, and lastly providing impact management recommendations.

6.1.15.1 Findings

A demographic snapshot of the site was completed to support the social baseline study. A summary of the local characteristics are provided below, using the 2021 Census data.

- Population: The Austral – Greendale area was home to approximately 12,553 residents. The median age was 34.
- Household type and size: 53% of families were couples with children, 31.5% were couple families without children. 92.6% of dwellings were separate houses. They were predominantly 4 bedroom dwellings.
- Income: The median weekly household income was lower than the Liverpool LGA and slightly lower than Greater Sydney. Higher proportion of households were experiencing housing stress compared to across Sydney.
- Work and Employment: 5,464 people in the labour force. Most common industries include Hospitals, Road Freight transport, and Supermarket and Grocery Stores.
- High levels of socio-economic disadvantage.
- Very low levels of crime, both compared to the wider Liverpool LGA and to NSW.
- Due to its agricultural setting, there is limited access to social infrastructure. The closest social infrastructure to the site was 800m away.

The SIA identifies the potential social impacts to arise from the proposal. The potential social risks relate to the construction and operational stages of the development. Mitigation measures have been identified for

negative impacts. Overall, the SIA highlights the development may result in minor to moderate negative social impacts, however, these can be effectively mitigated through the measures recommended within the AQIA, TIA, NVIA, and ACHA reports. Significant positive benefits are also outlined which demonstrates the proposal meets the community expectations and will unlock benefits in the future.

Construction

Table 51 Construction Impacts and Mitigation Measures

Potential Impact	Mitigation Measures	Residual Impact
Way of Life		
Noise, dust, odour and vibration from construction activity could negatively affect amenity for nearby residents, impacting upon way of life, quiet enjoyment of surroundings, and health and wellbeing.	- Consider informing potential affected neighbouring properties. - Limit works to standard construction hours. - The movement of all construction vehicles to be restricted to designated routes and confined to the regional road network. - Use best practice construction methods to reduce impact of dust and noise.	Low
Impacts to way of life and community wellbeing for the local community during construction works, including through potential changes to access arrangements.	Implementation of standard measures as part of a CTMP.	Low
Additional construction vehicle movements may increase congestion on surrounding roads, impacting way of life, accessibility and livelihoods for surrounding residents, workers and businesses	- Construction activity to be provided on-site or within on-street work zones - Construction activity to be coordinated with the construction of other developments in the vicinity of the Site where required. - Movement of trucks on and off the Site to be managed and controlled in accordance with appropriate protocols.	Low
Community		
Increased number of construction workers, potentially changing the composition of the local community from rural to industrial.	- Ensure ongoing communication with the community. - Implementation of Stakeholder Management Plan.	Low
Access		
Potential changes to access for surrounding businesses and residences from parking for workers on site during construction, impacting on accessibility	- Ensure dedicated parking is provided for workers or they are encouraged to travel via public transport. - Prepare a detailed CTMP.	Low
Culture		

Potential Impact	Mitigation Measures	Residual Impact
Potential impact on community and culture through fear of impacts to Aboriginal cultural heritage sites during construction.	- Engagement with Local Aboriginal Land Council. - Implementation of the identified measures within the ACHA.	Low
Potential impact on local cultural values through fear of impacts to non-Aboriginal heritage sites during construction.	Implementation of an unexpected archaeological finds policy as recommended in the ACHA report.	Low
Health and Wellbeing		
Dust from construction activity could cause a decline in air quality, potentially impacting the amenity of surroundings and health and wellbeing of neighbouring residents and workers.	- Employ dust suppression and air quality control measures. - Employ measures identified within the AQIA.	Low
Noise and vibration from construction activity may negatively affect amenity for residents, workers and businesses surrounding the Site, impacting upon quiet enjoyment of surroundings, way of life and health and wellbeing.	- Consider restricting times of construction, as well as screening and enclosures. - Implement the recommended mitigation measures from the Noise and Vibration Impact Assessment.	Low
Changed access arrangements and increased vehicle movements to and from the Site, including large construction vehicles with limited views, would increase the risk of collisions between pedestrians and vehicles in the area surrounding the Site.	Finalise a preliminary CTMP.	Low
Surroundings		
Potential impacts to the surroundings for local residents through visual impacts and changes to visual amenity associated with the proposed development.	- Ensure retention of trees where possible. - Seek to contribute to urban tree canopy and minimising heat island effect through planting and landscaping.	Low
Potential impacts on the surroundings (and sense of community for surrounding residents) during construction due to the proposed clearing of existing vegetation within the Site. The Site currently has a rural character and has an environmental corridor within the south-eastern corner of the Site.)	- Retention of trees and vegetation where possible - To mitigate views particularly from the south and west, the proposal incorporates wide landscape buffer zones that will be maintained.	Low

Potential Impact	Mitigation Measures	Residual Impact
Livelihoods		
Positive impacts to livelihoods (as well as community and way of life) in the study area from additional employment opportunities on site arising from construction activity (direct and indirect).	Construction activity will generate activity for the LGA and surrounds.	High (positive)
Decision Making Systems		
Potential feeling of powerlessness or lack of means to have input or say on the proposal during construction (for surrounding properties and the wider community), negatively impacting decision-making systems.	Undertake the required engagement strategies which enables community engagement and communication mechanisms.	Low
The operational impacts and mitigation measures are outlined in the table below.		
<i>Table 52 Operational Impacts and Mitigation Measures</i>		
Potential Impact	Mitigation Measures	Residual Impact
Way of Life		
Noise emissions from the operation of mechanical plant facilities and vehicle movements could potentially impact residents, workers, and businesses (on site and surrounding) enjoyment of surroundings, way of life and health and wellbeing.	- Use best practice construction methods to reduce impact of dust and noise. - Implement recommendations from within the Acoustic Assessment. - Prepare and implement CTMP.	Low
Community		
Potential for cumulative development to result in change in character of the area from rural and residential to industrial.	None identified. It is acknowledged that significant planning and consultation has been undertaken.	High
Access		
Impacts to access (and way of life) for existing local workers and residents as a result of the increase in worker population on site, which could create additional demand for local services including childcare services.	Prepare and implement CTMP.	Low
Culture		

Potential Impact	Mitigation Measures	Residual Impact
Potential impact on community and culture through changes to surrounds and context of neighbouring historic heritage items or impacts to sites of Aboriginal cultural significance.	Implement an unexpected finds protocol prior to the commencement of any works.	Low
Health and Wellbeing		
Increased safety and wellbeing through increased site activation, reducing opportunity for crime in the area.	- Incorporate CPTED principles. - As indicated in landscape and VIA, lighting is to be provided with a combination of light poles around the site to provide onsite security and safety.	Medium (positive)
Changed access arrangements and increased vehicle movements to and from the Site, including large construction vehicles with limited views, would increase the risk of collisions between pedestrians and vehicles in the area surrounding the Site.	Prepare and implement CTMP.	Low
Potential benefits to health and wellbeing (physical and mental health) of workers associated with eventual activation of the ENZ.	- The design of the warehouses, featuring amenity areas, aims to support health and well-being in the workplace beyond what is provided in typical warehousing facilities. - Once activated, the ENZ zone is expected to offer a diverse range of amenities not commonly found in other industrial precincts.	High positive
Surroundings		
Potential impacts to the surroundings (and community) for local residents through visual impacts and changes to visual amenity associated with the proposed development.	- Ensure retention of existing trees where possible. - Maximise opportunities to contribute to landscape setting. - CTMP to be prepared. - Incorporation of design features as outlined in the Visual Impact Assessment	Low
Livelihoods		
Additional employment opportunities on site arising from operational activity, positively impacting livelihoods, community and way of life. This would also increase the number of jobs available close to existing residents' home.	Operational activity will draw resources from and thereby generate economic activity in the wider region.	Medium (positive)

Potential Impact	Mitigation Measures	Residual Impact
Community		
Potential benefits to community cohesion and resilience by adding opportunities for meaningful engagement in the workforce.	None – positive	High positive
Decision Making Systems		
Potential feeling of powerlessness or lack of means to have input or say during operations, negatively impacting decision making systems.	The POM should clearly identify the participatory structure for residents to make suggestions or raise concerns. There should be a transparent process for resolving complaints made by the neighbours and community.	Low

6.1.16 Ecologically Sustainable Development

An Ecologically Sustainable Development (ESD) Report has been prepared by Aspire (2024) and is included at **Appendix S**. The report outlines the sustainable design initiatives that have been explored by the design team to be incorporated into the development. The categories investigated include:

- Passive design and energy efficiency
- Transport
- Materials
- Water
- Construction
- Land use and ecology
- Emissions
- Waste
- Climate change adaptation

Aspire identified key initiatives to be implemented in relation to each of the categories. **Table 53** outlined below details the relevant ESD initiatives proposed as part of the development. It is expected that these initiatives will be further developed during the detailed design phase and tracked throughout the project lifecycle.

Table 53 ESD Initiatives

Category	Initiative
Passive Design & Energy Efficiency	<u>Passive Design</u> ▪ A light external colour scheme that reduces the sites contribution to the urban heat island effect, also lowering internal temperatures by minimising the heat being transferred through the building fabric; ▪ Horizontal shading on the northern facades and vertical shading to the eastern and western façade to be incorporated, minimising peak HVAC loads whilst allowing winter daylight penetration ;

Category	Initiative
	▪ Suitably performing glazing for each facade, protecting from hot ambient air during summer whilst allowing heat to be kept inside during winter; and ▪ Thermal mass utilised where possible, helping to smooth out daily temperature peaks and troughs. <u>Energy Efficiency</u> ▪ Metering in line with minimum performance standards to track and monitor energy consumption; ▪ Efficient, air-cooled HVAC systems that eliminate water consumption associated with heat rejection; ▪ Heat pumps for Domestic Hot Water heating; ▪ Limiting the use of gas on site; ▪ Exceeding minimum energy efficiency provisions within NCC 2022 Volume 1; ▪ Solar PV systems installed throughout site to provide a portion of the sites power, whilst reducing peak power demands; ▪ Incorporating battery storage systems for energy generated from the PV systems; ▪ Provide a net zero statement in line with SEPP C4 Net Zero Provisions; ▪ Procurement of offsets in line with SEPP C4 Net Zero Provisions; and ▪ Energy efficient LED lighting throughout with appropriate motion & daylight controls.
Transport	▪ Showers & locker facilities for staff; ▪ A car-pooling system for the staff shall be implemented; and ▪ Integrated Sustainable Transport Plan.
Materials	▪ Environmental Performance Declarations (EPD's) for major material elements; ▪ Disclosure of embodied emissions in line with SEPP C3 Embodied Emissions; ▪ Recycled content in products where appropriate; ▪ FSC timber; ▪ Use of local materials; ▪ Use of prefabricated modules; ▪ Consider design for disassembly; and ▪ Paints, adhesives & sealants specified to contain low VOC & formaldehyde, improving internal air quality.
Water	▪ Installing fixtures and fittings in line with Liverpool DCP 2008 requirements outlined in Table 4 of the ESD Report; ▪ Ensuring native plant species are incorporated throughout, where possible; ▪ Inclusion of rainwater reuse tank positioned between the main buildings to be used for landscape irrigation; ▪ Re-use of water captured from the sprinkler system; ▪ Create a site water management plan to be submitted with the development application which includes proposals to reduce mains water supply;

Category	Initiative
	▪ Install stormwater run-off control and water quality management systems; and ▪ Air cooled HVAC systems, reducing water associated with heat rejection.
Construction	▪ Contractor construction waste management plan to investigate >80% of construction waste by weight being diverted from landfill; & ▪ Responsible management systems such as an Environmental Management Plan & implementing an Environmental Management System in line with ISO 14001.
Land Use & Ecology	▪ Plant beds & trees at multiple locations which allow for deep planting and significant canopy cover, providing shade, improving air quality as well as enhancing local levels of biodiversity; ▪ Utilising stormwater and WSUD features in line with Liverpool DCP 2008, decreasing the strain on central water infrastructure systems; ▪ Light colour schemes to external surfaces and areas of deep soil vegetation that reduce the urban heat island effect; and ▪ A soil and groundwater contamination survey in accordance with the R&H SEPP (refer to Appendix W).
Emissions & Waste	▪ Stormwater & WSUD features in line with planning controls, reducing the sites impact from stormwater runoff and pollution; ▪ Adopting air cooled HVAC systems, eliminating the risk associated with legionella disease when cooling towers are installed on site; ▪ Provision of facilities to enable separation of multiple waste streams including glass, plastic, cardboard and organic waste (OWMP will be complete); & ▪ Minimisation of construction waste to landfill.
Climate Change Adaptation	▪ Rainwater tank to reduce the potable water consumption of the development and reduce the strain on central water infrastructure; ▪ Light colour schemes keep the external surfaces of the building cool, reduce impacts of the urban heat island effect & keep naturally ventilated spaces cool; ▪ Increasing capacity of mechanical and electrical distribution boards to accommodate an increase in building electrical loads associated with a warming climate; ▪ Ensuring the development is constructed in accordance with recognised standards regarding wind tolerance and impacts from hail; & ▪ Offering areas of respite during extreme weather events.

Source: Aspire, 2024

6.2 Standard Impact Assessment

This section of the report addresses the matters which require a standard assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

Table 54 Standard Assessment

Issue (per SEARs)	Assessment	Mitigation
Contamination	A Detailed Site Investigation (DSI) (Appendix R) has been prepared by EP Risk. The purpose of the DSI is to consider whether the site is contaminated, and if it is, whether it is suitable in its state (or can be made suitable) for the purpose of the proposed development. Based on a review of historical information, it is understood that the site has formerly been used for agricultural purposes. A small dam is located within the central part of the site (in the ENZ zoned land) and has gradually increased in size to approximately 50 metres in length and width. The DSI has been informed by soil sample analysis as well as historical investigations. Groundwater sampling, sediment soil, surface water, and targeted soil sampling was undertaken in 2022. Soil samples were also previously taken in 2022. The additional soil sampling undertaken comprised a total of 20 test pit locations distributed across the ENT zoned land. The soil sample analysis reported concentrations of contaminants of potential concern below the adopted human health and ecological and / or laboratory limit of reporting (LOR). However, some exceedances to adopted ecological criteria have been identified within the remaining part of the site during historical investigations. Previous groundwater samples reported exceedances in Copper, Nickel and Zinc above the adopted guidelines. Exceedances were marginally above the criteria. As all results were within 1 order of magnitude from the selected criteria, it is considered likely that they are indicative of regional background concentrations and not of any specific source of contamination. PFOS and Sum of PFHxS and PFOS were also detected within the site groundwater above the relevant criteria. It is considered that this may be sourced from the adjacent land uses. Groundwater concentrations were reported below the recreational criteria therefore there is no direct contact Risk for construction and	The following industry best practice measures will be implemented: - Salinity management measures will be included as part of the construction environmental management plan for the site. - Anthropogenic material from the demolition of the existing shed and infrastructure should be removed from the site prior to any vegetation clearance or earthwork activities - An unexpected finds protocol will be implemented to address any unidentified contamination that may be encountered during construction - Where any on-site material requires disposal, this will be assessed in accordance with NSW EPA Waste Classification Guidelines, Part 1: Classifying Waste (2014) and the NSW EPA Waste Recovery Framework prior to disposal or beneficial re-use.

Issue (per SEARs)	Assessment	Mitigation
	maintenance workers on the Site or the Assessment Area. No asbestos containing material was observed on the surface or during intrusive investigations. Asbestos in soils concentrations were reported below the laboratory LOR in all soil samples analysed. Salinity samples were collected from seven locations. The results of the samples indicate that the site is characterised by non-saline to very saline soils. Soil at the surface is predominately non-saline. However, salinity was observed to generally increase with depth. Very saline soils were observed in two locations. A refined Conceptual Site Model was prepared based on the sample results and analysis. The refined Conceptual Site Model considers the contamination sources; affected media; potential exposure pathways, potential human and ecological receptors and potential and complete exposure pathways for the site. Overall, based on the assessment and a refined Conceptual Site Model, the site is considered suitable for the proposed development. The DSI did not identify human health or ecological risks to current or future receptors and no remediation is required.	
Hazards and Risk	A Preliminary Risk Screening Report has been prepared by SLR and is enclosed in Appendix AA. The report has been procured in accordance with the requirements of the R&H SEPP (former SEPP 33) to determine whether a Preliminary Hazard Analysis is required. The preliminary risk screening assesses the storage of specific Dangerous Goods (DGs) that have the potential for significant offsite effects. Only relatively small amounts of Dangerous Goods, below the Resilience and Hazard SEPP Threshold Quantities, will be stored within Warehouse 1. Accordingly, SLR confirm that Warehouse 1 is not considered potentially hazardous with regards to dangerous goods. In addition, Warehouse 2 operations is yet to be determined, however for the purposes of the assessment it is assumed dangerous goods storage on site will be limited to quantities less than SafeWork Placard Quantities. These levels are considered unlikely for dangerous goods quantities to increase	The proposed development will incorporate suitable engineering and design controls and accordingly no further mitigation is required.

Issue (per SEARs)	Assessment	Mitigation
	hazards associated with the development process. Any storage of dangerous goods on site will have to comply with the conditions set out in the relevant Australian Standards. The transport of Dangerous Goods to the site will be minimal based on the small amounts required on site. Accordingly, the amount of traffic movements for significant quantities of dangerous goods entering and leaving the site will be below the cumulative vehicle movement threshold set out in the SEPP 33 guideline. Accordingly, the proposed development is not considered potentially hazardous with regards to transport of Dangerous Goods. Overall, the proposed development is not considered potentially offensive or hazardous and a Preliminary Hazardous Assessment is not required.	
Building Code of Australia	A BCA Assessment Report has been prepared by Jensen Hughes and is enclosed at Appendix L. The BCA Report has been prepared to: ▪ Undertake an assessment of the proposed development against the deemed-to-satisfy provisions of the BCA. ▪ Identify matters that require plan amendments in order to achieve compliance with the BCA. ▪ Identify matters that are required to address performance solutions as part of the Detailed Design phase. ▪ Jensen Hughes confirm that the proposed development is capable of achieving compliance with the BCA subject to resolution of the matters identified in the BCA Report.	Where performance solutions are required, these will be determined, prior to the issue of the relevant Construction Certificate.
Accessibility	An Access Review Report has been prepared by Jensen Hughes and is enclosed in Appendix G . The review concludes that the development is capable of achieving compliance with the relevant accessibility requirements.	Not applicable.
Odour	The Air Quality Impact Assessment prepared by Northstar (Appendix I) also considers the odour impacts associated with the proposed development. Northstar consider that, given the nature of the proposed development,	Not applicable.

Issue (per SEARs)	Assessment	Mitigation
	odour will not be emitted in any significant quantity during construction or operation. The proposal does not include any significant odour sources to be considered within a dispersion modelling assessment and correspondingly, an assessment of odour impacts has not been performed.	
Developer contributions / Planning Agreement	In relation to the proposal the following development contributions will apply: - Western Sydney Aerotropolis Special Infrastructure Contributions (SIC). Note: the SIC will continue to apply to the site and wider WSA until it is to be repealed on 30 June 2026, for which the Housing and Productivity Contribution (HPC) will apply. - Liverpool Aerotropolis Section 7.12 Contributions Plan 2024 (s7.12 plan) <u>Western Sydney Aerotropolis Special Infrastructure Contributions</u> In accordance with SIC, the proposed development is subject to a contribution rate of \$111,826 (as of 1 July 2025) per hectare of net developable area. It is understood the SIC will form a condition of consent as part of the Notice of Approval. <u>Liverpool Aerotropolis Section 7.12 Contributions Plan 2024</u> In accordance with Council's S7.12 Plan, the site is subject to a contributions rate of 4.6% of the Estimated Development Cost for works over \$200,000. Based on the costs identified in the EDC Report, the contributions payable are anticipated to be \$4,968,824.96. The applicant will continue to engage with Council in relation to appropriate arrangements for the funding and delivery of any infrastructure identified in its 7.12 Contributions Plan. This includes the proposed half road upgrade of the Martin Road frontage to Collector Road standard.	Not applicable
Aboriginal Cultural Heritage	An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by Artefact (2024) and is provided at Appendix F. The ACHAR documents the process of investigation, Aboriginal community consultation with locally listed Aboriginal communities and the Registered Aboriginal Parties (RAPs); and, assessment with regard to potential Aboriginal cultural heritage and archaeology across the site. Aboriginal	Ongoing consultation will be undertaken with Registered Aboriginal Parties throughout the life of the project in accordance with the Recognise Country: Guidelines for Development in the Aerotropolis. Additionally, the following mitigation measures will be implemented during the construction phase:

Issue (per SEARs)	Assessment	Mitigation
	community consultation was undertaken in accordance with the 'Aboriginal cultural heritage consultation requirements for proponents 2010' and 'Recognise Country: Guidelines for Development in the Aerotropolis' (2022). The Recognise Country guidelines also informed the cultural heritage assessment undertaken by Artefact. Consultation was initiated on 2 September 2021 requesting registration of interest for the project and lapsed on 9 June 2022. Consultation recommenced on 9 November 2023. A total of 24 groups registered their interest in the project. The consultation was undertaken in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i>. During November 2023, RAPs were provided with written details of the Project and a methodology pack outlined the proposed ACHAR process requiring responses and feedback by 12 December 2023. A copy of the addendum ACHAR methodology was issued to the RAPs on 19th December 2023 requesting comments by 31st January 2024. The addendum ACHAR was subsequently sent to the RAPs on 9th February 2024 with feedback requested by no later than 9th March. Project updates were sent to the RAPs on 25th September 2024 and 15th April 2025 informing them of the continuation of the project. The updates included a copy of the ACHAR. As part of the investigations undertaken one area of archaeological potential (WSSRRC 01 – AHIMS 45-5-5773) was identified based on its proximity to the Wianamatta-South Creek watercourse. The remaining study area displayed observable historical disturbances associated with land clearing and agricultural activities. This, combined with the position of the study area within the flood zone, suggests that the archaeological integrity of the ground would be compromised as the soil profiles have been impacted by erosion, agricultural activity, and flood events. Artefact note, that it is unlikely that archaeological deposits would remain <i>in situ</i> within these mixed soil profiles. Because of this, the majority of the study area was considered to demonstrate low Aboriginal archaeological sensitivity. Noting that WSSRRC 01 – AHIMS 45-5-5773 will not be impacted by the proposal, an assessment of the significance of this Potential Archaeological Deposit (PAD) has not been	▪ Prior to the commencement of ground disturbing works, an exclusion zone will be established around the boundary the PAD site. The location of BCBW18 AS 03 will be recorded on construction drawings and barrier fencing placed along the southern Lot boundary of the proposed works to ensure that the site is not subject to impact during construction works. ▪ An unexpected finds policy will be implemented during ground disturbing works as detailed in the Aboriginal Cultural Heritage Assessment Report ▪ If suspected human remains are identified during construction works, all work in that area will cease and the area cordoned off. Where it is unclear whether the remains are human, a specialist, such as a physical anthropologist, will be called to site to confirm. Where it is either clear that the remains are human, or it has been confirmed by a specialist, the NSW Police and the Environment Line will be notified. Work would not recommence in the area where skeletal remains have been identified until such time as the relevant approval has been granted.

Issue (per SEARs)	Assessment	Mitigation
	undertaken in the ACHAR, nor did the RAPs identify the area as a place of significance. Notwithstanding, as the proposal will not impact any identified Aboriginal sites, this proposal is not expected to contribute to the cumulative impact of Aboriginal archaeological sites. However, Aboriginal cultural heritage values were identified with South Creek and the undeveloped nature of Badgerys Creek. As Aboriginal cultural heritage values are closely tied with landforms and landscape, any development, including the proposal, which involves ground disturbance contributes to a cumulative loss of cultural heritage values in the region.	
Non-Aboriginal Heritage	A statement of Heritage Impact has been prepared by Artefact and is enclosed in Appendix CC. European heritage The site is not listed on any heritage registers and there are not any heritage listings affecting land within 250 metres. There are no heritage structures or sites listed on the site or discovered as part of a field survey undertaken by Artefact in 2023. Accordingly, the site has no heritage value. The site is an open landscaped environment with scattered trees and some surrounding residential buildings. The views towards and through the site are consistent with the adjacent properties and none are significant from a heritage standpoint. Archaeology The archaeological potential of the study area has been assessed as generally nil-low with only the potential for extant remains associated with the modern farming infrastructure. It is understood that a previous heritage study was undertaken for the Western Sydney Aerotropolis in 2020 to assess potential built, Aboriginal, and historical archaeological heritage in the wider area. The previous study identified 230 Martin Road as a potential archaeological site (Site ID: 307). This designation related to a potential unidentified structure on the site built before 1917. The previous study did not provide any detailed assessment of the site or the unidentified structure. No physical inspection	Proposed mitigation measures include: ▪ An unexpected finds procedure will be implemented during construction ▪ All staff involved in the proposed works, including design professionals and tradespeople, will receive a heritage induction prior to the commencement of works. The heritage induction will include the Unexpected Finds Procedure and the appropriate steps to follow in the event that an unexpected archaeological find is encountered. Clear lines of communication will be established for the reporting of any such finds and for procedures to be rapidly implemented.

Issue (per SEARs)	Assessment	Mitigation
	of the site was undertaken for that assessment, which was based on a desktop study. The previous study therefore did not provide any direct evidence of the unidentified built before 1917. Instead, its findings were likely based on the 1935 Liverpool Map, which shows a potential house structure located within the western portion of the site near Martin Road. However, no other detected historical plans dated to this time (early-twentieth century) show signs of this unidentified structure and no documentary evidence refers to the structure. Additionally, historical plans and aerial imagery from the 1940s onward show no sign of this structure within the study area. As a result, the additional research and assessment have concluded that the study area contains nil-low potential for remains associated with this unidentified structure. This is consistent with the assessed level potential for the study area as outlined in the Heritage Impact Statement and with the site inspection for the study area, which identified no physical heritage within the site. The works will physically impact the site through excavation works, and the construction of the new buildings. However, as the site does not meet the criteria for local or state heritage significance as and there is a nil-low likelihood of historical archaeological remains, the proposal will result in a neutral physical impact on the site. There are no heritage views across or within the site. Accordingly, the proposed development will result in a neutral visual heritage impact. The site has a nil-low potential to contain significant archaeological remains associated. Accordingly, the proposed development will have a neutral archaeological impact. In the unlikely event that any unexpected archaeological remains are identified during construction, the project would be required to continue under the Unexpected Finds Procedure (UFP) to ensure the remains are appropriately managed.	
Airport Safeguarding	An <i>Airport Safeguarding Assessment (Appendix LL)</i> has been prepared by L+R Consulting in relation to the proposal against the relevant National Airports Safeguarding Framework (NASF) Guidelines as they apply to	In relation to the Guidelines, relevant management and mitigation measures should include: ▪ Guideline C:

Issue (per SEARs)	Assessment	Mitigation
	the future WSI. The report also considers the relevant requirements of the Precincts SEPP. Guideline A: The site is located within the ANEF 20–25 zone. In accordance with AS2021:2015 <i>Acoustics – Aircraft Noise Intrusion – Building Siting and Construction</i> (AS2021), industrial buildings are acceptable in ANEF zones less than 30; however, L+R Consulting note, that office spaces may require design solutions to adapt to noise management requirements. Guideline B: The proposed development is located outside of the assessment trigger areas as defined under Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports. Guideline C: This pertains to the way in which land use activities are managed in the vicinity of airports with respect to the attraction of wildlife, particularly birds. The site is located within the 3 km wildlife management area. Guideline D: The proposed development does not include provision for the installation of any wind turbines or wind monitoring towers. Guideline E: NASF Guideline E provides guidance on the risk of distractions to pilots of aircraft from lighting and light fixtures near airports. Accordingly, the <i>CASA Part 139 (Aerodromes) Manual of Standards 2019</i> Section 9.144: <i>Lights – requirements for zones</i> sets out the restrictions and degree of interference ground lights can cause to pilots and aircraft operations. Importantly, the proposal is outside of the light control zones; however, within the 6 km radius. Therefore, the report outlines that the mounting of PV panels on the roofs must be given due consideration to ensure the positioning will not impact upon aircraft operations. Guideline F: The critical OLS surface over the site is the OLS inner horizontal at 125.5 m AHD. The proposed development includes provision for a maximum elevation of 64.9 m AHD, which remains below the maximum permitted elevation. Should future operations be proposed which have the potential to affect plume rise, a Plume Rise Assessment would be undertaken in accordance with the relevant CASA requirements. Guideline G: This does not apply to the proposal as the site is outside of the Building Restricted Areas zone.	– Regular monitoring surveys – Wildlife hazard assessments – Wildlife awareness and management training for relevant staff – Establishment of bird population triggers – Implementation of activities to reduce hazardous bird populations – Adoption of wildlife deterrent technologies to reduce hazardous bird populations

Issue (per SEARs)	Assessment	Mitigation
	Guideline H: The site is not located within 3.5 km of any hospitals and therefore Guideline H is not relevant. Guideline I: The site is outside of any Public Safety Areas for which Guideline I does not apply.	

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 design of the project has been carefully considered to ensure any potential impacts of the development are minimised. The development will deliver a modernised and ecologically sustainable development that delivers upon the orderly and economic use and development of the land.

Principles of design excellence and connection with Country have been implemented through built form and ancillary items (landscaping and civil engineering) to ensure the proposed development can address the design excellence provisions under the Precincts SEPP. Notwithstanding, there are limitations associated with industrial-format proposal's and how they can achieve 'design excellence'.

The design of the building and layout has been carefully considered to ensure the site has been optimised to its full potential, whilst limiting potential environmental impacts. The building and associated landscaping goes beyond traditional warehousing as seen in nearby industrial precincts such as Mamre Road combining both built form and landscaping to drive key ecological, architectural and economically sustainable outcomes that will continue to deliver ongoing employment opportunities once fully constructed.

Technical investigations (including the corresponding report items) which are appended to this EIS, have also been used to guide critical design outcomes and inform key planned management and mitigation measures for any potential impacts identified.

Key stakeholders and Government agencies (including utility providers) have also been consulted with throughout the design development phase to ensure that the proposal is capable of being supported during the construction and operational phases throughout the interim and ultimate scenarios as infrastructure dependencies are delivered throughout the Precinct.

7.2 Strategic Context

The proposed development aligns with the strategic direction and objectives for Western Sydney and Liverpool LGA as established in **Section 2** of this report. The proposal will deliver large format warehousing within the Aerotropolis ENT zone and will form an important part of the anticipated industrial land supply that is expected to be delivered around WSI as well as addressing the continued demand for industrial floorspace in Liverpool. The two separate tenancies will deliver a variety of employment opportunities within the site.

The proposal will contribute to a competitive and efficient freight and logistics network by delivering additional industrial floorspace close to existing and planned transport infrastructure, including the WSI, an upgraded Elizabeth Drive and the planned Eastern Ring Road. It will comprise one of the first developments to be delivered within the Aerotropolis and act as a catalyst for development within the Badgerys Creek precinct and the growth of the Western Parkland City.

The development will be limited to the disproportionately small area of land zoned ENT fronting Martin Road. A large area of ENZ land will be retained to the east which will accommodate minor landscape embellishment, future Sydney Water regional stormwater. An appropriate area of land within the ENT zone has also been set aside for the future provision of a Park Edge Street. Landscaping and deep soil will be

provided across the site, which aligns with the objectives to increase canopy cover across the Aerotropolis and supporting the delivery of the Wianamatta (South) Creek Green Grid.

7.3 Statutory Context

The relevant State and local environmental planning instruments are listed in **Section 4** and assessed in **Section 6**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant Objects of the EP&A Act as defined in Section 1.3 the Act and addressed in **Appendix B**.
- This EIS has been prepared in accordance with the SEARs as required by Sections 190–192 of the EP&A Regulation.
- Consideration is given to the relevant matters for consideration as required under the BC Act and the SSD is supported by a BDAR for the areas of the site not subject to certification under the Western Sydney Growth Centres.
- This SSDA pathway has been undertaken in accordance with the Planning Systems SEPP as the proposed development is classified as SSD being development within the Western Sydney Aerotropolis over \$30 million.
- The Section 7.12 Aerotropolis Contributions Plan was adopted by Liverpool City Council in July 2024 and applies to the land. It is anticipated that a condition of planning consent will require the payment of contributions in accordance with this plan. The applicant will continue to engage with Council in relation to appropriate arrangements for the funding and delivery of any infrastructure identified in its 7.12 Contributions Plan. This includes the proposed half road upgrade of the Martin Road frontage to Collector Road standard.
- Concurrence from TfNSW will be required as per the T&I SEPP for ‘traffic generating development’.
- The proposal is consistent with relevant provisions under the Precincts SEPP as detailed in **Appendix B**. The proposed development is consistent with the objectives of the ENT and ENZ zones
- The development is generally consistent with the relevant requirements of the Western Sydney Aerotropolis Precinct Plan. Minor variations to the Precinct Plan have been justified in a written variation request under s4.39 of the Precincts SEPP (refer **Appendix PP**). The design has been considered by the SDRP and recommendations adopted where feasible and practicable.
- The development is able to meet the objectives and performance outcomes and benchmark solutions under the WSA DCP. Where alternate solutions are required to meet the performance outcomes, this have been detailed and appropriately justified in the compliance table (refer **Appendix D**).
- The proposed development satisfies the relevant provisions of the Biodiversity and Conservation SEPP 2021.
- The proposed development has been assessed in accordance with the Resilience and Hazards SEPP and the development complies with the relevant clauses.
- An assessment of the proposed building signage against the relevant criteria specified in Schedule 5 of the Industry and Employment SEPP is included in **Appendix C**. The assessment demonstrates that the proposed signage satisfies the assessment criteria and is consistent with the objectives set out in section 3.1(1)(a) of the SEPP.
- Details of the embodied emissions associated with the proposed development are enclosed with this SSDA in accordance with the requirements set out in Section 3.2(2) of the Sustainable Buildings SEPP 2022. A Net Zero Statement has been provided at **Appendix MM**.

- The proposal is consistent with the relevant performance outcomes and benchmark solutions within the DCP 2022 as outlined in **Appendix C** Where alternative solutions are required to meet the performance outcomes of the DCP these are detailed in the compliance table and discussed in the relevant sections within this EIS.

7.4 Community and Stakeholder Engagement

Community and stakeholder engagement has been undertaken by the Applicant and consultant team in preparation of this SSD. As part of this, the Applicant has engaged with:

- Surrounding landowners, tenants and businesses
- RAPs and First Nations representatives as part of the ACHAR and Connecting with Country strategy
- Government (State and Local), State Agencies (TfNSW and Sydney Water), utility service providers and other key stakeholders

This engagement for the project was overseen by Astrolabe. The Engagement Outcomes Report (refer **Appendix Q**) confirms that the engagement was undertaken consistent with the requirements articulated in the *Undertaking Engagement Guidelines for State Significant Projects* and complied with the community engagement requirements as outlined under the SEARs. Feedback obtained from Government agencies and utility stakeholders has been incorporated into the design and assessment in the EIS. The applicant has continued to engage with key stakeholders including Sydney Water, Council.

At the time of lodgement of the SSDA, minimal feedback has been received from surrounding landowners, The applicant has engaged with Boral (southern property owner pursuing an SSDA), Goodman (developing 225-245 Martin Road), Formus (Crosslink Industrial Estate) and ESR (Badgerys Creek Industry Park)

In accordance with the EP&A Regulation, the EIS will be placed on formal public exhibition. Following this exhibition period, the Applicant will respond to any matters raised by notified parties in accordance with s4.15 of the EP&A Act.

7.5 Likely Impacts of the Proposal

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** The proposal addresses the principles of ecologically sustainable development (**ESD**) in accordance with the requirements at Section 193 of the Regulations and as outlined below:

- 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.

This EIS has not identified any serious threats or 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.

- Intergenerational equity: the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The proposed development is intended to benefit both the current and future generations by:
 - Providing new local employment generating opportunities during the construction and operational phases.

- Delivering a development that will assist in providing locally sourced and nationally distributed resources (Warehouse 1) and provision for a speculative warehouse (Warehouse 2) in close proximity to the new WSI.
- Protecting a large area of land zoned ENZ adjacent to Wianamatta (South) Creek.
- 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 or ecological significance and integrity of surrounding land, subject to the implementation of mitigation measures. The site includes provision for embellishment by way of planting native vegetation which will facilitate a development that will conserve and support local ecological diversity and integrity, as well as satisfy and remain consistent with the wider strategic objectives of both the Precinct Plan and WSADCP in relation to landscaping and creation of the blue-green grid.
- 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 impacts on the natural environment in relation to air quality, water quality or waste management. The effects of the development will be acceptable and managed accordingly by the planned management and mitigation measures proposed under this Application.

- **Built Environment:** The proposal has been assessed in relation to the following key built environment impacts:
 - **Built Form:** The proposal is compatible with the envisaged future character of the surrounding area and provides a scale of development that is appropriate for the site, generally consistent with the Precinct Plan and DCP, and considers the current and future market demand requirements for the industrial and employment sector. The design of the building reflects a well-articulated design, is of high quality features and provides good amenity for future employees.
 - **Visual Impacts:** The proposal is visually compatible with the desired future character and land uses envisaged within the WSA, and specifically within the Badgerys Creek Precinct (following review of current Applications in the system). The visual impacts range from negligible to moderate and are considered acceptable on the whole. The proposal does not block views and once fully developed and landscaping has reached maturity, any potential visual impacts would be further reduced.
 - **Trees and Landscaping:** The proposal involves minimal tree removal, as vegetation within the ENT is largely limited to grasses and shrubs. An enhanced landscaping outcome is proposed, informed by a Connecting with Country strategy prepared by Ngurra Advisory. The landscape design applies key recommendations from consultation with First Nations representatives and balances opportunities for increased tree canopy with aviation safeguarding and bushfire constraints within 3 kilometres of Western Sydney Airport. The approach is responsive to the site context, has regard to Planning for Bush Fire Protection 2019, and complements the built form while remaining consistent with the objectives and requirements of the Precinct Plan and the DCP.
 - **Traffic:** The proposed development can be accommodated within the environmental and road network capacity of the area and is therefore suitable for the site. Future intersection performance is forecast to operate at acceptable levels, enabling the network to support the development and manage the associated increase in traffic. A mid-block capacity assessment has also confirmed that additional lane upgrades to Martin Road are not required, from a traffic volume perspective, to support day-one operations of the proposal. The proposal provides

sufficient on-site parking to support warehouse operations and is consistent with the requirements of the WSADCP.

- **Noise and Vibration:** Construction and operational noise impacts are generally predicted to be below the relevant noise criteria. The assessment has given particular consideration to rural-residential dwellings zoned ENT under the Precincts SEPP, as these represent the most sensitive potential receivers. However, as these land parcels are intended for future development, the associated risk and level of concern are limited. Feasible and reasonable noise mitigation measures have been identified by Renzo Tonin and are recommended for implementation throughout the project lifecycle.
- **Air Quality:** Construction and operational air quality impacts associated with the proposed development are predicted to be below the relevant assessment criteria. Accordingly, the development is not expected to result in adverse air quality impacts.
- **Social:** The proposal will have the following positive social impacts:
 - The proposal will generate local and regional employment opportunities close to planned public transport services and planned infrastructure upgrades (M12 Motorway, Elizabeth Drive, Eastern Ring Road and future Martin Road) as envisaged by the Precinct Plan, all of which provide enhanced connectivity to the site.
 - Through the implementation of the Connecting with Country Framework a First Nations Working Group will be established to guide the project to ensure it remains deeply connected to Country and respectful of cultural values. The applicant will be encouraged to consider how it may deliver meaningful employment and procurement opportunities for local Aboriginal people and businesses.
 - The proposal will contribute to ongoing orderly development and is consistent with the objectives of the Badgerys Creek Precinct within the Precinct Plan.
 - The proposal includes amenities and design outcomes which support a healthy work environment, including outdoor staff amenities.
- **Economic:** The proposal will generate approximately 60 jobs during construction and 108 ongoing operational jobs. It will support the early activation of the Badgerys Creek Precinct and contribute to the establishment of Western Sydney International Airport and the broader Western Sydney economy.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix E** 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 the Western Sydney Aerotropolis. The site forms part of the Badgerys Creek precinct, which comprises an ‘first priority area’ for development.
- The proposed built form will be limited to the western part of the site, which is zoned ENT under Precincts SEPP. Warehouse or distribution centre and manufacturing uses are permissible with consent in this zone and consistent with the relevant objectives set out within the Precincts SEPP.
- The proposed warehouse or distribution centre use (with ancillary manufacturing in warehouse 1) is entirely consistent with the desired future character for the Badgerys Creek precinct as established within the Precinct Plan.
- The proposed development will be very well connected to primary freight routes including the Eastern Ring Road, the upgraded Elizabeth Drive and the M12 Motorway. These roads will be primary

freight routes serving the aerotropolis. Proximity to such routes is critical to the logistics supply chain and a pre-requisite of many industrial tenants.

- The Metroll warehouse will supply essential building materials and will play a critical role in supporting the delivery of the Aerotropolis and housing within Western Sydney
- Any environmental impacts associated with the proposed development can be appropriately mitigated.

7.7 Public Interest

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

- The proposal is consistent with relevant State, Regional and local strategic plans and is consistent with the relevant planning controls.
- The proposal will create 60 construction jobs as well as 108 direct jobs once complete and fully operational. These additional jobs will provide significant benefit to the local community.
- The proposal will comprise one of the first development's to be delivered within the Badgerys Creek precinct and the wider Western Sydney Aerotropolis. It will support the function of the Aerotropolis and stimulate growth in the area as envisaged within strategic planning policy.
- The proposed development will address a specific and growing demand for industrial floorspace within the Aerotropolis and Western Sydney as a whole.
- The proposal will incorporate significant landscaping, which will provide significant canopy cover and mitigate the urban heat island effect. The proposed development responds to 'connection to country' through the inclusion of Indigenous public artwork and herbalist garden walks around the amenity areas.
- The proposal will utilise a range of building materials and articulation, which will stimulate visual interest outside the site. The proposed building will have an attractive appearance and comprises a significant betterment compared to the existing site.
- The proposal includes interim and permanent access arrangements, which allow development to be delivered on the site and respond to anticipated infrastructure upgrades to be delivered in the future by others.
- No adverse environmental, social or economic impacts will result from the proposal.
- The site will facilitate the orderly and economic use and development of the land.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent and implementation of the proposed mitigation measures.

Disclaimer

This report is dated 5 May 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 EMKC3 PTY Ltd (**Instructing Party**) for the purpose of Working draft (**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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