



3 January 2025

David Schwebel
Senior Planning Officer, Industry Assessments
Development Assessment and Sustainability
Department of Planning, Housing and Infrastructure

By Email: david.schwebel@planning.nsw.gov.au

Dear David,

Burrah Park SSD70316465
1953-2109 Elizabeth Drive, Badgerys Creek

Thank you for the opportunity to provide comments in response to the public exhibition of the Burrah Park State Significant Development application (SSD70316465) at 1953-2109 Elizabeth Drive, Badgerys Creek (the site). We understand that the proposal seeks consent for a Concept Plan for the site and then a Stage 1 development application for warehousing and logistics buildings.

It is noted and appreciated that both the Department of Planning, Housing and Infrastructure (DPHI) and the proponent have separately consulted with WSA in relation to the preparation of this SSD application given the proximity of the site to the airport and end of the northern runway. There are multiple airport safeguarding provisions that apply to this site and continued engagement on any activity on this site is essential.

In the interest of safeguarding the future safety and operation of WSI, our feedback includes comments for consideration, request for additional information and suggested conditions of approval. Please find attached a table of our feedback on the Concept Plan and Stage 1 application.

Thank you again for the opportunity to provide comments on this application. If you would like to discuss any of the feedback or require further clarification, please contact me on nwilliams@wsaco.com.au

Yours Sincerely,

A handwritten signature in black ink that reads 'Natasha Williams'.

Natasha Williams
Planning Manager



WSI Feedback – Burrah Park SSD70316465:

Theme	Concept Plan	Stage 1
General Aviation Safeguarding	- The Building Envelopes and GFA for Superlot 2b, specifically lots 2.7c, 2.8 and 2.8b should not be approved in the current form as the compliance with the airport safeguarding provisions of the Western Parkland City SEPP cannot be adequately addressed at a concept plan level of detail. - A future, detailed SSD application, should set out the building envelopes, uses and GFA and heights in the southeastern corner (Superlot 2b).	
Aircraft Noise	For any industrial development within the 30-40 ANEC appropriate conditions should be applied to ensure compliance with <i>AS2021:2015 Acoustics Noise Intrusion - Building siting and construction development</i>.	A condition should be applied to ensure compliance with <i>AS2021:2015 Acoustics Noise Intrusion - Building siting and construction development</i>.
Windshear and Turbulence	- Buildings that intrude in the 1:35 building height surface plane require further assessment in accordance with National Airport Safeguarding Framework (NASF), Guideline B and consultation with WSI. - Future individual development lots and individual buildings may be required to undertake detailed assessment in accordance with NASF Guideline B, which may also require CFD Modelling, particularly for future stages in the southeastern corner identified as Lot 2.7B, 2.7C and 2.8B. - Future stages are to show building envelopes/heights in 3D against the 1:35 plane to enable assessment.	It is noted that the Stage 1 development area is within the assessment trigger area, however the proposed buildings are below the 1:35 building height plane. If the heights change then a further assessment under the NASF Guideline B and consultation with WSI is required.
Wildlife Risk	As provided in the Wildlife Hazard Management Plan (WHMP), the management actions, monitoring, reporting and review are to be used to	As provided in the Wildlife Hazard Management Plan (WHMP), the management actions, monitoring, reporting and review is to

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	inform future developments on the site and be updated accordingly and in accordance with the legislation at the time. In accordance with the WHMP any reports as a result of monitoring on site shall be provided to WSI within 28 days of completion.	be used to inform future developments on the site and be updated accordingly and in accordance with the legislation at the time. In accordance with the WHMP any reports as a result of monitoring on site shall be provided to WSI within 28 days of completion.
Lighting	- Noting the general aviation safeguarding comment above, the future lots 2.7A, 2.7B, 2.7C, 2.8A, 2.8B are located within a Lighting Intensity Zone A. Lighting is to comply with Lighting Intensity Zone Future developments must comply with the requirements under the NASF Guideline D requiring, in particular that lighting must not exceed the intensity of light 0 candela (cd) above a 3-degree horizontal. - WSI acknowledges that the application was referred to CASA by DPHI and that they provided comments in relation to lighting including: - street/security lights are not to shine upwards and are not to have green, red or white arrays of lights.	- A Glint and Glare Study is to be prepared and submitted to the Department of Planning, Housing and Infrastructure and WSI to understand the cumulative impact from materials used in the building together with the solar panels across the site. This will be required to be referred to CASA. - WSI acknowledges that the application was referred to CASA by DPHI and that they provided comments in relation to lighting. - A condition of consent should be imposed that street street/security lights and construction lighting does not shine upwards and is not to have green, red or white arrays of lights.

Prescribed Airspace	• The southeastern corner of site is within critical airspace surfaces, including the Obstacle Limitation Surface (OLS). Whilst the maximum building heights are below OLS, the future construction of buildings may require the use of cranes or other equipment that may impact on protected airspace. • Development that impacts protected airspace requires a controlled activity approved under the Airports (Protection of Airspace) Regulation 1996. A Controlled Activity application must be submitted to WSI for assessment and consultation with relevant Commonwealth Agencies. WSI as the Airport Lessee Company (ALC) will assess the application and refer it the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for determination. • Protected airspace includes the OLS and PANS-OPS as well as other surfaces. It should be noted that the PANS-OPS surface is currently being prepared). It should be noted that long term intrusion into the PANS-OPS (i.e. greater than 3 months) are prohibited. this will need to be taken into consideration for the future development outcomes for the southeastern corner of the site, in particular the constructability of future development. • It should be noted that under SEPP (Precincts-Western Parkland City) 2021 Clause 4.22, development consent must not be granted to development unless the relevant Commonwealth body (e.g. WSI) supports it.	• Future applications will be required to consider plume rise in accordance with CASA Advisory Circular AC139.E-02v1.0 Plume Rise Assessments. • Whilst the maximum building heights are below OLS, the future construction of buildings may require the use of cranes or other equipment that may impact on protected airspace. • Development that impacts protected airspace requires a controlled activity approved under the Airports (Protection of Airspace) Regulation 1996. A Controlled Activity application must be submitted to WSI for assessment and consultation with relevant Commonwealth Agencies. WSI as the Airport Lessee Company (ALC) will assess the application and refer it the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for determination. • The following condition of consent should be imposed: <i>If the proposed development results in impacts to protected airspace, then approval will need to be obtained in accordance with the Airports Act 1996 and the Airports (Protection of Airspace) Regulations 1996. Intrusions into prescribed airspace, could include:</i> • constructing permanent structures, such as buildings, into the protected airspace;
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		<i>temporary structures such as cranes protruding into the protected airspace; or</i> <i>activities causing non-structural intrusions into the protected airspace such as air turbulence from stacks or vents, smoke, dust, steam or other gases or particular matter.</i> A Controlled Activity application must be submitted to WSI.																									
Communication and Navigation Facilities	- Given the Localiser and Glidepath Building Restricted Area covers the southern portion of the site, the application was referred to the Airservices Australia. A determination of the application should not be undertaken by the consent authority until feedback is received from Airservices Australia. WSI have been advised that this can take up to six weeks (sent 21 November 2024). WSI will forward the response when received. - The Aviation Safeguarding Assessment refers to RLs of the end of the runways which do not align with the actual runway elevations. The report indicates that the end of Runway 05L is at 73.2m. The O5L runway elevation is 92.82m and the 23R elevation adjacent to the site is 75.12m. Any analysis within the ASA should be revised in reference to the correct runway elevations. <table><tr><th colspan="2">RUNWAY DATA</th><th>EASTING</th><th>NORTHING</th><th>ELEVATION</th><th>RUNWAY LENGTH</th></tr><tr><td rowspan="4">RUNWAY END POINT</td><td>05L</td><td>286914.06</td><td>6247443.79</td><td>93.82</td><td rowspan="2">3,700</td></tr><tr><td>23R</td><td>290067.11</td><td>6249379.83</td><td>75.12</td></tr><tr><td>05R</td><td>287916.77</td><td>6245829.84</td><td>84.58</td><td rowspan="2">3,700</td></tr><tr><td>23L</td><td>291069.83</td><td>6247765.88</td><td>71.65</td></tr></table>	RUNWAY DATA		EASTING	NORTHING	ELEVATION	RUNWAY LENGTH	RUNWAY END POINT	05L	286914.06	6247443.79	93.82	3,700	23R	290067.11	6249379.83	75.12	05R	287916.77	6245829.84	84.58	3,700	23L	291069.83	6247765.88	71.65	- Given the Localiser and Glidepath Building Restricted Area covers the southern portion of the site, the application was referred to the Airservices Australia. A determination of the application should not be undertaken by the consent authority until feedback is received from Airservices Australia. WSI have been advised that this can take up to six weeks (sent 21 November 2024). WSI will forward the response when received. - The Aviation Safeguarding Assessment refers to RLs of the end of the runways which do not align with the actual runway elevations. The report indicates that the end of Runway 05L is at 73.2m. The O5L runway elevation is 92.82m and the 23R elevation adjacent to the site is 75.12m. Any analysis within the ASA should be revised in reference to the correct runway elevations.
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Public Safety Area	Noting the general aviation safeguarding comment above, future development of Lot 2.7C should be subject to a detailed development proposal that includes building envelopes, end uses and GFA and heights to enable a detailed assessment. Specifically, lots 2.7c, 2.8 and 2.8b should not be approved in the current form as the compliance with the Clause 4.23 of the Western Parkland City SEPP cannot be adequately addressed at a concept plan level of detail.	It is noted that the Stage 1 development is not within the PSA.																									
Traffic and Transport	<u>Concept Layout</u> - WSI notes that concept layout and the location of the development access road off Elizabeth, has been positioned to allow for a future 4th leg at the intersection to provide access to WSI land. <u>Traffic Modelling</u> - The assessment has conservatively utilised a high vehicle mode share, recognising that public connectivity to the site, particularly early post-opening years will be limited. However, the mode share split for 2036 is considered to be over estimated for public transport (a combined 36% by 2036).	Refer to comments in Concept Plan, which capture Stage 1 development.																									

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	- The development generated trips were assumed to be: - In the AM peak, 75% inbound and 25% outbound - In the PM peak, 30% inbound and 70% outbound - It is unclear as to how the inbound and outbound proportions were derived. Further explanation of the assumed trip distribution is required, including the following: - only 20% of trips utilise the M12, which appears to be low, compared to 30% heading east on Elizabeth Drive. 10% of trips are assumed to be to/from the airport main access road. This proportion of trips to/from the airport appears high and should be clarified, particularly as the airport's freight/cargo precinct is accessed via The Northern Road. 15% of trips are assumed to be to/from Badgerys Creek Road. It is likely this does not consider the future closure of Badgerys Creek Road and the introduction of Eastern Ring Road. - Background traffic growth used in the assessment has been derived from TfNSW's SDTA model. WSI is of the view this model does not fully capture proposed developments in the surrounding WSI and therefore underestimates future traffic volumes, particularly along Elizabeth Drive. - Whilst the intersection performance assessment for the Elizabeth Drive/ Development Access Road shows acceptable intersection performance for the Stage 1 development, the intersection performance for the Concept Masterplan, shows this intersection fails and reaches LoS F. - Similarly, intersection performance for the full development (including northern residual lands and University of Sydney land) is LoS F in the AM peak for all assessed scenarios. - In the AM peak, the longest queue lengths occur for the Elizabeth Drive East approach as vehicles try to access the site, flowing back to the M12	

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	intersection. This will have an unacceptable impact on the M12/Elizabeth Drive interchange and significantly impact access to the airport. • The traffic volume forecasts (refer 6.4.1 of the Traffic Impact Assessment) show the increase in traffic volumes as a percentage of the 2034 post development traffic volume and therefore the percentage calculations in this section are misleading as they do not show the percentage increase in traffic compared to pre-development. For example, the M12/Elizabeth Drive intersection has a traffic volume increase of 1,570, which is a 75% increase in post development traffic at the intersection (not a 43% increase). • Total traffic generation for Concept Proposal is estimated to be over 3,000 trips during the AM peak hour and over 2,100 trips during the PM peak hour. This in comparison is higher than the vehicle traffic generation from WSI by 2030 (passengers, staff, and business precinct etc). • The traffic modelling results indicate that the proposed single access point off Elizabeth Drive for the development is insufficient for the Concept Master Plan. • Site access arrangement should be reviewed and additional access points should be considered, particularly to and from the east. The future alternative access via Luddenham road will have some, but limited benefit as it is assumed only 25% of trips are from the west, with 5% using Luddenham Road. • The modelled scenarios with high public transport mode shares appear to have been applied to all development trips. This should be clarified as the public transport mode share should not be applied to warehouse trips and therefore network and intersection performances may be further impacted. • WSI has previously raised the potential for constructing a 4th leg (i.e. southern approach) to the intersection to provide access to the WSI site. No commentary has been provided in traffic assessment regarding this and its potential impact on intersection performance.	



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