WSI responses to the "Response to Submissions" prepared for SSD70316465
11 July 2025

WSI Comment	Applicants Response	WSI Response (July 2025)
Concept Plan		
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).	Agreed	It is noted that the applicant's response agrees with WSI's original submission to not approve Superlot 2b. This needs to be reflected in the Concept Plan. The Concept Plan still shows details around building envelopes, GFAs and heights etc. for Superlot 2b. An amended Concept Plan should be prepared that address the comments in relation to Superlot 2b (lots 2.7c, 2,8 and 2.8b) Comments still apply
Aircraft Noise For any industrial development within the 30-40 ANEC appropriate conditions should be applied to ensure compliance with AS2021:2015 Acoustics Noise Intrusion - Building siting and construction development.	Agreed and consistent with the assessment in Section5.1 of Avlaw's report	Comments still apply and should be reflected in conditions of consent
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.	Noted and agreed.	Comments still apply

Future stages are to show building envelopes/heights in 3D against the 1:35 plane to enable assessment.		
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.	Agreed and consistent with the assessment in Section 5.4 of Avlaw's report	Comments still apply and should be reflected in conditions of consent.
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	Agreed and consistent with the assessment in Section 5.5 of Avlaw's report. Non-conventional construction methods may need to be considered if construction will take place after WSI opens, which is currently the plan.	Comments still apply Construction methods need to be considered ahead of the airport opening as the airspace is declared and the Airports (Protection of Airspace) Regulation 1996 apply.

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		
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.	Avlaw confirms that the runway elevations used to inform its assessment/modelling are correct. The reference to runway 05L elevation at 75.12m AHD is a typo. Therefore, the conclusions in our report can still be relied upon, noting Airservices still need to validate these findings as the exact location of the navigation aids are not in the public domain.	Airservices responded to the original SSD with the following comments: *Airservices are unable to provide a definitive assessment of this proposed development given our designs for the instrument flight procedures (IFP) and communications, navigation & surveillance (CNS) are still ongoing.* *Based on the supplied report, the proposed development appears to remain clear of the surfaces associated with Airservices future designed IFPs, but potentially impacts the CNS building restricted areas (BRAs). Once a*

		finalised building design is completed, Airservices will need to conduct a formal assessment to confirm clearance from all surfaces to be protected. *While not mentioned within the report, if the proposed development is to include any roof-top solar panels, glint & glare assessments will need to be made in relation the proposed ATC tower at Western Sydney.* *The use of construction equipment required to carry out these developments may require separate assessment.* *We look forward to continuing to work with Western Sydney Airport in relation to this proposed development, and if you have any further queries, please let me know.*
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. RUNWAY DATA / EASTING / NORTHING / ELEVATION / RUNWAY LENGTH RUNWAY END POINT 05L: 286914.06, 6247443.79, 93.82, 3,700 RUNWAY END POINT 23R: 290067.11, 6249379.83, 75.12, 3,700 RUNWAY END POINT 05R: 287916.77, 6245829.84, 84.58, 3,700 RUNWAY END POINT 23L: 291069.83, 6247765.88, 71.65, 3,700		Noted
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	Agreed and consistent with the assessment in Section 5.8 of Avlaw's report	Comments still apply Refer to comments above regarding the exclusion of Superlot 2b from Concept Plan.

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.		
Concept Layout - Traffic 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. Traffic Modelling • 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). • The development generated trips were assumed to be: In the AM peak, 75% inbound and 25% outbound o 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	Between August 2024 and April 2025, a series of consultations were carried out with TfNSW to confirm the appropriate trip generation assumption for the proposed development. Arcadis has undertaken updated traffic modelling using the trip generation rate which was agreed upon with TfNSW. The following updates have been incorporated in this addendum report including: ▪ Trip generation rates have been revised based on the Guide to Transport Impact Assessment (TfNSW, November 2024) and TfNSW endorsement (email dated 24 February 2025 ▪ new 3-way signalised intersection at Elizabeth Drive / development access road. Pedestrian crossings are provided on all three approaches as per TfNSW requirements ▪ Traffic modelling has now assumed 100% car mode share for the proposed development ▪ Traffic modelling has assumed that the Burrah Park full development would include the University of Sydney land Traffic distribution assumption for the site has been sourced from TfNSW SDTA traffic model and has been accepted by TfNSW.	No further comments

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 intersection. This will have an unacceptable impact on the M12/Elizabeth Drive interchange and significantly impact access to the airport.	A traffic addendum report has been prepared. The updated modelling in traffic addendum report shows that new signalised intersection with Elizabeth Drive would provide overall level of service C in the AM peak and level of service B in the PM peak hour. The proposed intersection layout would also provide level of service D or better at the individual movement level. The updated traffic modelling has assumed 100% car mode share for the proposed development and achieved an overall level of service B to C for the new signalised intersection with Elizabeth Drive / development access road. These levels of service have been achieved with a single access point, being Elizabeth Drive, which negates the requirement for a second access point onto Luddenham Road. From a traffic perspective, a single access point onto Elizabeth Drive as proposed in the Stage 1 SSDA would accommodate the full development traffic from the Burrah Park site including Sydney University land. was agreed upon with TfNSW.	

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	The updated traffic modelling has assumed 100% car mode share for the proposed development. Trip generation rates have been revised based on the Guide to Transport Impact Assessment (TfNSW,	

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.	November 2024) and TfNSW endorsement (email dated 24 February 2025.	
Stage 1		
Aircraft Noise A condition should be applied to ensure compliance with AS2021:2015 Acoustics Noise Intrusion - Building siting and construction development.	Agreed and consistent with the assessment in Section 5.8 of Avlaw's report.	Comment still applies
Windshear and Turbulence 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.	Agreed and consistent with the assessment in Section 5.2 of Avlaw's report	A condition to be included: *Prior to construction of any buildings within the Windshear Trigger Assessment Area, confirmation that the cranes used for construction will not intrude into the 1:35 building height plane. If the cranes intrude then an assessment is to be provided to WSI for consideration.*
Wildlife Risk As provided in the Wildlife Hazard Management Plan (WHMP), the management actions, monitoring, reporting and review is to be used to inform future developments on the site and be updated accordingly and in accordance with the legislation at the time.	Noted and agreed.	Comments still apply and should be reflected in conditions of consent.

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 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 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	In response to the RFI issued by WSIA, a Glint and Glare Study has been prepared by EMM (Appendix O) to demonstrate the cumulative impact from materials used in the buildings together with solar panels across the site. A summary of the assessment is provided at Section 5.8 of the RtS Report, and further details are provided at Appendix G.	It is noted that the Glint and Glare Assessment refers to the following: *Reflections that impact visibility from an air traffic control facility. The WSI does not have an air traffic control facility on site at the airport. Therefore, no assessment has been conducted for air traffic control.* WSI has a Digital Aerodrome Service that will provide a mast with 360degree cameras which need to be free from reflectivity. In this regard the Glint and Glare Assessment has been sent to Airservices Australia and CASA to assess the impact. CASA has requested that WSI ask proponent to model the potential impact of Glint and Glare on the tower. Airservices Australia are yet to provide a response. The applicant is requested to provide a revised Glint and Glare Assessment that considered the Mast and Cameras used at WSI for Air Traffic Control. The applicant can contact WSI for details on the location of the air traffic control tower. It is also requested that a determination not be made for the application until CASA and Airservices has provided feedback and has had an opportunity to assess the impact of glint and glare on air traffic control.

application and refer it the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for determination.		Original comments still apply
The following condition of consent should be imposed: 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: • constructing permanent structures, such as buildings, into the protected airspace; • temporary structures such as cranes protruding into the protected airspace; or 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. A Controlled Activity application must be submitted to WSI.	Agreed and consistent with the assessment in Section 5.5 of Avlaw's report.	Condition of consent still applies
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.	Avlaw confirms that the runway elevations used to inform its assessment/modelling are correct. The reference to runway 05L elevation at 75.12m AHD is a typographical error. Therefore, the conclusions in our report can still be relied upon, noting Airservices still need to validate these findings as the exact location of the navigation aids are not in the public domain.	Airservices responded to the original SSD with the following comments: *Airservices are unable to provide a definitive assessment of this proposed development given our designs for the instrument flight procedures (IFP) and communications, navigation & surveillance (CNS) are still ongoing.* *Based on the supplied report, the proposed development appears to remain clear of the surfaces associated with Airservices future designed IFPs, but potentially impacts the CNS*

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Public Safety Area It is noted that the Stage 1 development is not within the PSA.	Noted, Stage 1 is not within the PSA.	No further comment
Traffic and Transport Refer to comments in Concept Plan, which capture Stage 1 development	Noted, refer to the responses to the WSI Concept Plan comments above, which captures Stage 1 development.	Refer to above comment