

WSA Reference: WSA25.008

1953-2109 Elizabeth Drive, Badgerys Creek

SSD70817958

Dear Jess,

Thank you for the opportunity to comment on the State Significant Development Application (SSD70817958) for the northern portion (Stage 2) of the DHL Logistic Facility, located at 1953-2109 Elizabeth Drive, Badgerys Creek. We understand that the proposal comprises:

- Construction and operation of two industrial buildings with a height of 14.6m (RL 80.6m)
- Warehouse 1 and Warehouse 2 (total GFA 66,756m²)
- Associated multi-level car parking for 440 spaces
- Landscaping with water features
- 24-hour operation
- Signage
- Two ancillary offices

WSI requests that the following matters be addressed:

Impact	General Comments
Aircraft Noise	
Office buildings	<p>The Aviation Impacts Assessment (AIA) is to assess aviation noise using the ANEC from the State Environmental Planning Policy (Precincts – Western Parkland City) 2021.</p> <p>The proposed office buildings are located within the ANEC/ANEF 25 to 30 and must comply with Australian Standard 2021: 2015 to achieve specified indoor sound levels. It is recommended this be imposed as a condition of consent.</p>
Building Windshear and Turbulence	
Development in the 1:35 area	<p>A small portion of Warehouse 1 is located within the Windshear Trigger Assessment Area but is below the Building Height Plane. However, crane use during construction will potentially intersect the building height plane.</p> <p>It is noted that the application was referred to CASA for comment; however further information regarding the crane used for construction that will intrude into the 1:35 building height plane is to be provided to WSI ahead of any works commencing. Details are to include the location of the crane, the type of crane including specific measurements in relation to width and height, and boom length. A condition of consent should be imposed to this effect.</p>
Wildlife Hazards	
Development is within the wildlife buffers, and proposes features	<p>It is not clear if the Landscape Species selected is in accordance with the Aerotropolis Development Control Plan Appendix B Western Sydney Aerotropolis Landscape Species List. Confirmation is required that the appropriate landscape species</p>

<p>which could attract wildlife</p>	<p>are being used to ensure that wildlife attraction risk is adequately addressed.</p> <p>Of note, the EIS indicates that the AIA addressed suitable landscape species to demonstrate that wildlife attraction is mitigated. The AIA did not address this.</p>
	<p>Given the site location in relation to future flight paths and the extent of landscaping and bioretention basins, the proposed development should address the following to minimise wildlife attraction:</p> <ul style="list-style-type: none"> • Design, management and monitoring of the onsite bio retention and sediment basins. • Landscaping species selection and maintenance. • The design and management of waste storage areas/receptacles during construction. • External handling and storage of organic materials. • Monitoring and management of any wildlife.
	<p>Whilst a Biodiversity Assessment was undertaken, there is no assessment as to the potential impacts of any wildlife on that site and impact to airport operations. Given there are basins on site, this should be undertaken, particularly in relation to ongoing management and mitigation and the sites proximity to arrival and departure flight paths, where aircraft will be operating at lower altitudes.</p>
<p>Lighting</p>	
<p>Development is within the Lighting Control Zones / Lighting Intensity Radius Area</p>	<p>The site includes areas located within Lighting Control Zones C and D and is wholly situated in the 6km Lighting Intensity Radius. Lighting on the site must not exceed an intensity of light for Zone C – 150 cd, and for Zone D – 450cd above the 3-degree horizontal plane.</p> <p>External lighting is to be fitted with a screen/shroud that prevents the light emission above the horizontal plane. A condition of consent should be imposed to this effect.</p>
<p>Where construction lighting is likely</p>	<p>Any construction lighting should be detailed post approval, including measures to ensure that lighting used in construction does not point upwards or potentially result in risk to pilots. A condition of consent should be imposed to this effect.</p>
<p>Airspace Operation</p>	
<p>OLS</p>	<p>Based on the information provided it appears that the height of the development is below the OLS. However, there is inconsistent height of buildings information detailed in the EIS. For example, the AIA needs to undertake an assessment based on the overall height including the air conditioning units.</p>

	<p>Should the proposal and design change have the potential to impact the prescribed airspace the proposal will need to assess the development’s potential impacts on the OLS, during construction and operation. It should be noted that the <i>Airports Act 1996</i> covers any intrusions into prescribed airspace, which could include:</p> <ul style="list-style-type: none"> a. constructing permanent structures, such as buildings, into the protected airspace; b. temporary structures such as cranes protruding into the protected airspace; or c. activities causing non-structural intrusions into the protected airspace such as air turbulence from stacks or vents, smoke, dust, steam or other gases or particulate matter. <p>If it is likely that any of the above components would result in an impact on protected airspace, then a Controlled Activity approval will need to be obtained in accordance with the <i>Airports Act 1996</i> and the <i>Airports (Protection of Airspace) Regulations 1996</i>.</p>
<p>PANS-OPS</p>	<p>The PANS-OPS is not finalised and Airservices Australia will need to assess the development against the PANS-OPS. It should be noted that under the <i>Airports (Protection of Airspace) Regulations</i> permanent intrusions are prohibited and temporary intrusions are limited to three (3) months.</p> <p>The EIS notes that Airservices Aust needs to be consulted. WSI will refer the application to Airservices Australia for assessment. Advice from Airservices will be forward to the Department of Planning once it is received.</p>
<p>Crane use impact on prescribed airspace</p>	<p>Construction cranes may be required to operate at a height significantly higher than that of the proposed development causing intrusion into prescribed airspace and consequently, may not be approved under the <i>Airports (Protection of Airspace) Regulations</i>. Approval to operate construction equipment (i.e. mobile and tower cranes) in the prescribed airspace should be obtained prior to any commitment to construct.</p> <p>Controlled Activity enquiries and applications should be directed to airspaceprotection@wsiairprt.com.au</p>
Glide Path Building Restricted Area	
<p>Proposal is in Glide Path Restricted Area, as shown in the Western Sydney Airport Plan</p>	<p>A small portion of Warehouse 2 is within the Glide Path Trigger Assessment Area, assessment should be included in regard to the Glide Path Building Restricted Area.</p> <p>The EIS/AIA notes that Airservices Aust needs to be consulted, and it appears this has not been done by the applicant to date. The AIA indicates that consultation was undertaken with CASA, Airservices and WSI, however there no details documented in Table 1.</p>

	<p>WSI will refer the application to Airservices Australia for assessment to conduct a formal assessment of potential impacts to Communications, Navigation and Satellite systems.</p> <p>The AIA refers to a Ground Base Augmentation System (GBAS), WSI will not be using GBAS.</p> <p>Any assessment is to also include temporary intrusions such as cranes.</p>
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Aviation Impact Assessment

	<p>Any analysis within the AIA should be revised in reference to the correct runway elevations as outlined on our website to ensure an accurate analysis, particularly for the building height plane for windshear. Correct details below and as shown on WSI's website: Airport safeguarding Western Sydney International Airport</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="background-color: #cccccc;">RUNWAY DATA</th> <th style="background-color: #cccccc;">EASTING</th> <th style="background-color: #cccccc;">NORTHING</th> <th style="background-color: #cccccc;">ELEVATION</th> <th style="background-color: #cccccc;">RUNWAY LENGTH</th> </tr> </thead> <tbody> <tr> <td rowspan="4" style="text-align: center; vertical-align: middle;">RUNWAY END POINT</td> <td style="text-align: center;">05L</td> <td style="text-align: center;">286914.06</td> <td style="text-align: center;">6247443.79</td> <td style="text-align: center;">93.82</td> </tr> <tr> <td style="text-align: center;">23R</td> <td style="text-align: center;">290067.11</td> <td style="text-align: center;">6249379.83</td> <td style="text-align: center;">75.12</td> </tr> <tr> <td style="text-align: center;">05R</td> <td style="text-align: center;">287916.77</td> <td style="text-align: center;">6245829.84</td> <td style="text-align: center;">84.58</td> </tr> <tr> <td style="text-align: center;">23L</td> <td style="text-align: center;">291069.83</td> <td style="text-align: center;">6247765.88</td> <td style="text-align: center;">71.65</td> </tr> <tr> <td colspan="2"></td> <td></td> <td></td> <td style="text-align: center;">3,700</td> </tr> <tr> <td colspan="2"></td> <td></td> <td></td> <td style="text-align: center;">3,700</td> </tr> </tbody> </table>	RUNWAY DATA	EASTING	NORTHING	ELEVATION	RUNWAY LENGTH	RUNWAY END POINT	05L	286914.06	6247443.79	93.82	23R	290067.11	6249379.83	75.12	05R	287916.77	6245829.84	84.58	23L	291069.83	6247765.88	71.65					3,700					3,700
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Should you have any further question or clarifications regarding the above please contact planning@wsiairport.com.au