

Appendix A – Submissions Register – DHL South

1 Responses to Submissions

This section provides a detailed summary of the Applicant's response to the issues raised in submissions to SSD-70818708.

Provided the extent of submissions received during the public exhibition process from DPHI, NSW government agencies and Penrith City Council, response to the issues have been provided in the following sections below

- **Section 1.1** Department of Planning, Housing and Infrastructure (DPHI)
- **Section 1.2** Western Sydney International Airport (WSIA)
- **Section 1.3** Bradfield Development Authority
- **Section 1.4** Heritage NSW
- **Section 1.5** Conservation Programs, Heritage and Regulation Group (CPHR)
- **Section 1.6** Civil Aviation Safety Authority (CASA)
- **Section 1.7** Transport for NSW (TfNSW)
- **Section 1.8** Fire and Rescue NSW (FRNSW)
- **Section 1.9** Rural Fire Service (RFS)
- **Section 1.10** Heritage Council of NSW
- **Section 1.11** Penrith City Council
- **Section 1.12** Sydney Water
- **Section 1.13** Endeavour Energy
- **Section 1.14** Public Submissions

1.1 Department of Planning, Housing and Infrastructure

Table 1 below identifies each of the matters raised and sets out the Applicant's response to these submissions.

Table 1 Applicant Response to DPHI

No.	Issue Raised	Applicant Response	Reference
General			
1	As the development is a subsequent development within the Burrah Park concept proposal, you must ensure that the proposal is consistent with the concept. Outline any updates to the development made to reflect any revisions to SSD-70316465 as part of the Submissions Report for that application. This must include updating any technical reports, plans etc. to be consistent with the assessment and recommendations of any relevant reports and plans for the concept proposal.	The Burrah Park concept proposal is currently under assessment and is subject to ongoing design and environmental assessment refinements in response to government authority requirements and comments. Notwithstanding, this DHL application (SSD-70818708) has been updated to reflect the latest version of the Burrah Park concept proposal to facilitate its timely assessment and progression. For further details, refer to Section 2 of the RtS Report.	Section 2 of the RtS Report.
2	Ensure the development and the concept are consistent, noting differences in GFA identified in section 4.2 of the EIS.	The Burrah Park concept proposal, which is currently under assessment, has been updated to be consistent with this SSDA application (SSD-70818708). Refer to Section 3.2.4 of the RtS Report.	Section 3.2.4 of the RtS Report.
3	The EIS and Statutory Compliance Table make references to a draft contributions plan. Ensure that any references to contributions are reflective of the contributions plans in place. Please also provide further detail about how contributions will be	The contribution plans in place are as follows: The Western Sydney Growth Areas Special Infrastructure Contribution (SIC) which came into effect on 14 January 2021.	Section 4.4 of the RtS Report.

No.	Issue Raised	Applicant Response	Reference
	addressed for this development with regard to any planning agreements proposed, or contributions to be made, under SSD-70316465.	The Penrith Aerotropolis Development Contributions Plan formally adopted by Council on 23 July 2024 and came into effect on 14 August 2024. With regard to any planning agreements, co-ordination is still being undertaken across the Burrah Park concept proposal applicant team (HBB & ISPT), DHL and the relevant government authorities. Clarity on whether any planning agreement will be established for this DHL application (SSD-70818708) will be resolved prior to the finalisation and determination of this application, provided to DPPI as soon as it is able.	
Recognise Country			
4	The EIS and Statutory Compliance Table do not provide a sufficient response to the Recognise Country: Guidelines for development in the Aerotropolis as required by section 4.28B of State Environmental Planning Policy (Precincts—Western Parkland City) 2021 (Western Parkland City SEPP). The Guidelines also require completion of the Recognise Country Response Template, which was not provided with the EIS.	The detailed SSDA forms part of the broader Concept SSDA for Burrah Park which has undergone the designing with Country process and Recognise Country response. The DHL proposal aligns with the design framework established under the Burrah Park concept SSDA. Burrah Park Engagement Sessions 30/08/21 Collaborative Workshop with Community 09/02/22 Northern Gateway Targeted workshop 22/06/22 Walk on Country 22/08/22 Aerotropolis Workshop 12/06/24 RAPs Feedback Session 25/06/25 Dharug Women Feedback Session	N/A

No.	Issue Raised	Applicant Response	Reference
		If required, a Community feedback session can be held to discuss the DHL proposal in the next detailed design phase. This can form an updated Recognise Country template for the DHL sites.	
5	The Connecting with Country Report recommends ongoing consultation in relation to a number of matters. Provide further detail on how this will be implemented.	This is not required for this SSD and has thus been removed from the Connecting with Country Report. The relevant ongoing consultant in relation to a number of matters is relevant to, and will be addressed as part of the Burrah Park concept proposal SSDA.	Appendix D
6	Section 4 of the Connecting with Country Report (Appendix H) refers to the EEP site. Please ensure the report and assessment relates to this DHL proposal.	The reference has been removed from the updated Connecting with Country Report.	Appendix D
Architectural Plans			
7	All elements of the proposed buildings should meet the setback requirements in Table 6 of the Western Sydney Aerotropolis Development Control Plan (Aerotropolis Phase 2 DCP). This includes the proposed two storey car park structures proposed for each warehouse, which are currently set back 6m from the lot boundary. It is considered that applying the relevant building setback to these structures is more appropriate given their form and their location in front of the warehouses. This would also improve the presentation of the development to the street, provide for opportunities for increased landscape screening and reduce the visual impact of having a bulky	All elements of the proposed buildings meet the setback requirements in Table 6 of the Western Sydney Aerotropolis Development Control Plan (Aerotropolis Phase 2 DCP). Notably, the two storey car park structures are proposed to be set back 7.5m, compliant with the DCP requirement. Refer to Section 3.2.1 of the Rts Report and the updated Architectural Plan at Appendix B .	Section 3.2.1 of the Rts Report and the updated Architectural Plan at Appendix B

No.	Issue Raised	Applicant Response	Reference
	structure closer to the street than the proposed offices.		
8	In addition to the above, please also provide further detail on the design and embellishment of the car park structures to improve presentation to the street and integrate with the overall design of the building, with regard to section 3.3.4 of the Aerotropolis Phase 2 DCP.	The two storey car park structures are proposed to be set back 7.5m, compliant with the DCP requirement. Additionally, the carpark façade will feature either/or permeable panelling or a partial planted green wall to provide screening to the carpark façade. This, in addition to the landscape treatment of the carpark surrounds, including trees and shrubs, will improve the presentation of the building to the street as per the DCP.	Appendix B
9	Provide details of any illumination of signage, lighting and fencing with regard to sections 3.4, 3.5 and 3.6 of the Aerotropolis Phase 2 DCP.	The signage plan is provided in Updated Architectural Plans (Appendix B), there are no changes to the signage details as exhibited and no illuminated signage is proposed. The architectural plans have also been updated to include further details on the location of boom gates as they interface with the fencing across the site.	Appendix B
Landscaping			
10	The Aerotropolis Phase 2 DCP requires a tree canopy coverage of 25% of the site area. The development proposes a canopy cover of 16%, while the DCP Compliance Table suggests that the combined DHL North and South developments achieve a combined total of 25% – this is not accurate. The development must provide the minimum required canopy cover on lot, unless it can be demonstrated that a sufficient	Consistent with the Burrah Park concept proposal, a performance-based approach to development requirements has been adopted with the performance outcome for tree canopy coverage requiring ‘sufficient tree planting’ while also addressing the Western Sydney International Airport Wildlife Mitigation Measures (DCP 2.10.3). The design has been prepared to ensure tree clusters of < 5 are maintained with spacing of 2-6 m to avoid continuous canopy and higher wildlife attracting risk. Notably, trees with canopy not	Appendix B Appendix H

No.	Issue Raised	Applicant Response	Reference
	canopy cover strategy is in place for the Burrah Park concept that will ensure an acceptable canopy cover is achieved across the estate.	touching at maturity, but planted very close (e.g. 1 m between canopy) would still create continuous wildlife that may encourage bird/bat use, which is why greater spacing between clusters has been provided. The development design has been prepared to maximise on-lot tree canopy coverage while also addressing this balance of considerations, and this aligns with the strategy adopted for the Burrah Park concept which is being progressed to deliver an acceptable canopy cover across the estate. It is noted that the updated clustering of trees results in a reduction in tree canopy density the updated landscape design results in a tree canopy coverage of 13.2%.	
11	Retaining walls are proposed on the eastern and western boundaries of the site. Confirm that the proposed landscaping and areas of deep soil will be achievable in areas on or adjoining these retaining walls.	The retaining walls have been designed to accommodate appropriate soil depths and planting, ensuring that landscaping outcomes and deep soil zone requirements can be met in accordance with the relevant controls.	Appendix J
12	Confirm that the ponds/waterbodies within the landscaped areas will not increase the risk of wildlife hazards, with regard to section 2.10.3 of the Aerotropolis Phase 2 DCP.	A Wildlife Hazard Assessment Letter prepared by Eco Logical Australia concludes that the proposed built form and landscaping approach for the DHL site is consistent with the Burrah Park concept-wide Wildlife Hazard Assessment and Wildlife Hazard Management Plan. The DHL landscape design includes five small, shallow, non-contiguous wetland areas (total area 0.11 ha across DHL Stages	Appendix C

No.	Issue Raised	Applicant Response	Reference
		1 and 2) that are amenity-focused and are not considered 'water storage facilities' under the <i>Aerotropolis Phase 2 DCP</i> or <i>Western Parkland City SEPP</i>. These wetlands incorporate design mitigations consistent with Sydney Water Guidelines (including edge treatments, macrophyte planting and safety benches) to minimise wildlife attraction and will be subject to ongoing monitoring and adaptive management under the Burrah Park Wildlife Hazard Management Plan. No separate or additional site-specific Wildlife Hazard Assessment or Wildlife Hazard Management Plan is required.	
Design Excellence / Visual Impact			
13	Detail how the development contributes to an improved presentation to the M12, as raised by the State Design Review Panel advice for Burrah Park. Further consideration should also be given to how the design responds to views of the development from the air.	The proposed DHL development within the Burrah Park Industrial Estate will comprise low-profile warehouse buildings in a landscaped setting, designed to blend with the precinct and enhance views from the M12 Motorway, surrounding open spaces, and aerial perspectives. Refer to Section 4.2 of the RtS report.	Section 4.2 of the RtS report
14	Consideration should be given to increasing setbacks and areas of landscaping to provide more canopy cover and screening. This may also involve providing more planting instead of turfed open space in landscape areas.	Refer to the responses to Item 7 (comment relating to setback to carpark structure) and Item 10 (comment relating to tree canopy coverage).	Item 7 Item 10 Appendix B
15	With regard to section 4.33(2)(m) of the Western Parkland City SEPP, provide further design options to	This DHL application (SSD-70818708) relates only to two (2) buildings within a broader estate comprised of forty-two (42)	N/A

No.	Issue Raised	Applicant Response	Reference
	differentiate the built form, landscape and character of the four warehouses (combined north and south sites) as seen during approach to the site, with consideration of providing more variation in forms, planting, and via small non-alignments.	buildings and section 4.33(2)(m) of the Western Parkland City SEPP requires: <i>“(m) architectural diversity where the development is to consist of more than 2 buildings.”</i> The opportunity for architectural diversity for warehouses is limited by the road layout established across Burrah Park, as well as the practical requirements for DHL.	
16	Investigate improvements to the connection between walkways in landscape areas and carparks, with consideration of the journey for people driving to work and parking and walking into the office, how can they move through this landscape.	The proposed pedestrian connections between the carpark and the office provides the most direct and convenient path to get to work. The landscape area with its respective walkways and seating areas provides areas with high natural amenity and can be easily accessed by workers from the office or carpark. Where practical connections could be provided through the landscape area from the carpark to the office, they have been included.	Appendix B
Traffic			
17	Update the Transport and Accessibility Impact Assessment to reflect any revisions to the Burrah Park traffic assessment, including updated modelling assumptions and access arrangements based on feedback from TfNSW on the concept proposal. Also ensure that the report reflects the latest development proposal, for example section 2.3 refers to two access	The report has been updated to reflect any revisions to the Burrah Park traffic assessment.	Appendix I

No.	Issue Raised	Applicant Response	Reference
	points on Elizabeth Drive, which are no longer proposed for the Burrah Park development.		
18	As the development is for a known tenant/operations, the assessment of trip generation should utilise the first principles method in the Guide to Transport Impact Assessment (TfNSW 2024).	The Traffic Impact Assessment has been updated to include a first principles traffic assessment informed by the anticipated operational characteristics of a warehouse and logistics facility, including employee shift changes, freight scheduling and expected vehicle arrival/departure patterns. The assessment demonstrates that forecast site-specific traffic generation remains within the traffic generation assumptions previously adopted for the broader Burrah Park assessment and that the majority of site traffic movements occur outside the surrounding road network peak periods. The adopted trip rates are based on the rates included in Arcadis's Burrah Park Concept approval (SSD-70316465). These rates were reviewed and agreed with TfNSW.	Appendix I
Noise			
19	As noted previously, the noise impact assessment (NIA) prepared by SLR has been undertaken without regard to the noise assessment provided for the Burrah Park development prepared by EMM. This DHL application is subject to the Burrah Park concept proposal, which, if approved, will set noise limits and conditions for the whole concept that will need to be addressed by subsequent development applications (including this application). Accordingly, should the noise assessment be accepted as sufficient for the	An updated Noise Impact Assessment (NIA) has been prepared by SLR (Appendix L) (rev. 3.0, dated 7 August 2025). As per this NIA comment, the NIA has been updated to adopt the noise allowance criteria in the Burrah Park NIA for the permanent residential receivers located north-east of the site (NCA01) as well as the cumulative noise allowance adopted by EMM / Burrah Park development and compliance is demonstrated in the updated NIA.	Appendix L

No.	Issue Raised	Applicant Response	Reference
	Burrah Park concept, the noise assessment for the DHL application will need to demonstrate how it is consistent with the assessment and noise limits applied to the concept.		
20	As the land in NCA01 has retained the C4 Environmental Living zoning, it would be more appropriate to apply the rural amenity classification (as identified in Table 11 of the NIA) for both current and future scenarios.	Noted. The residents in NCA01 have been updated to remain as rural residential during the future operation. The Stage 1 and Stage 2 reports have been updated to reflect this, and compliance is expected to be achieved.	Appendix E
21	Clarify the source of the vehicle traffic data in Table 23 of the NIA and confirm it is consistent with the traffic generation identified in the Transport and Accessibility Impact Assessment.	The worst-case 15-minute period numbers and details was data provided by Stantec to SLR to address the on-site traffic acoustic impacts. It is noted that Stantec's Transport and Accessibility Impact Assessment. does not feature this information as this level of details is specifically relevant to acoustic assessment and otherwise, the figures provided have been prepared to be consistent with Stantec's report.	Appendix E
22	Confirm whether the operational noise assessment considered noise generated by side unloading of B-Doubles on the hardstand areas (i.e. not in loading bays), as identified in section 4.2 of the Transport and Accessibility Impact Assessment.	Confirmed that operational modelling includes noise generated by trucks side loading/unloading on the hardstand (not recessed loading dock). This will require forklifts to operate on the hardstand which includes noise from forklift movement and reverse alarms.	Appendix E
Hazards			

No.	Issue Raised	Applicant Response	Reference
23	While the proposal does not include the storage of DG in significant quantities, it is reasonable to anticipate that small amounts may be present as part of routine warehouse operations. As the concept plan remains under assessment, it is recommended at this stage that, in line with previous advice on the concept plan, the storage of DG within each warehouse be limited to placard quantities as defined in Schedule 11 of the Work Health and Safety Regulation 2017 (NSW).	Agreed, the proposal does not include the storage of DG in significant quantities and limitations on any storage of DG within each warehouse should be conditioned in accordance with Schedule 11 of the Work Health and Safety Regulation 2017 (NSW). An example of the suitable condition wording is provided below: <i>XX1. The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.</i> <i>XX2. Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with:</i> <i>(a) all relevant Australian Standards; and for liquids,</i> <i>(b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.</i>	N/A
Aviation			
24	Section 4 and Table 1 of the Aviation Impact Assessment is incomplete.	Section 4, Table 1 has been updated in the Updated Aviation Assessment Report (Appendix G) which provides details of the comments received from the relevant stakeholders and the respective responses.	Appendix G
Contamination			
25	It is noted that the EIS is supported by a Detailed Site Investigation, Remedial Action Plan, Supplementary	Note, that these are most likely to be unnecessary as they can be addressed by the Burrah Park SSD, these were provided for	N/A

No.	Issue Raised	Applicant Response	Reference
	Contamination Investigation and Summary of Contamination and Remediation, which make recommendations on the required remediation of the site. Please confirm if this will be necessary given the site-wide earthworks and remediation proposed under the Burrah Park Stage 1 works that seek to make the site suitable for industrial use.	information and can be held in stasis pending the progression of the Burrah Park SSD. Once the Burrah Park SSD is determined to include the site wide earthworks and remediation, then the contamination reports prepared for this SSD can be excluded from the assessment and any consent.	
Air Quality			
26	Section 7.0 of the Air Quality Impact Assessment states that details of operational activities are unknown. However, as the Applicant will occupy and operate the development, this information should be available and incorporated into the assessment. Similarly, Section 8.3.2 is based on speculative traffic generation, but the detailed traffic movements and vehicle types should be obtained from the Applicant and used in the assessment.	Section 7.3.2 of the updated Air Quality Impact Assessment (Appendix E) has been updated so that the peak traffic movements are consistent with the traffic rates that have been adopted across the broader Burrah Park Concept Proposal and traffic assessment prepared for this SSDA. Main sources of operational emissions – truck and vehicle movements, idling during loading/unloading, and associated pollutants (CO, NO _x , PM10, PM2.5, SO ₂ , VOCs). It is confirmed that there are no other sources of potential air pollutants beyond vehicular movement as a result of the proposed development operations. The updated traffic rate assumptions is reflected in the updated modelling inputs and outcomes detailed in Section 13 of the updated AQIA and continues to demonstrate that the potential impact of the development itself is considered negligible.	Appendix E
ESD			

No.	Issue Raised	Applicant Response	Reference
27	Review the Net Zero Statement at Appendix C of the Sustainability Management Plan to ensure it provides the details required by Planning Circular PS23-001 and the Net Zero Statement Technical Note.	SLR have reviewed the Net Zero Statement and conclude that it is in line with the Planning Circular PS23-001 and the Net Zero Statement Technical Note. It incorporates the required building envelope, systems, onsite renewables, energy and carbon reductions, electrification and Greenpower details to become a net zero development. This Net Zero Statement format and detailed inclusions has been approved for multiple SEPP 2022 projects. This is reflected in the updated ESD Report provided at Appendix F .	Appendix F
28	Provide further detail on how the development responds to the objectives and performance outcome of Section 2.12 of the Aerotropolis Phase 2 DCP in relation to energy supply and net zero emissions.	SLR have reviewed the Net Zero Statement and conclude is also in line with Section 2.12 of the Aerotropolis Phase 2 DCP. It responds to the objectives and performance outcomes by providing details of how building envelope and systems minimise energy consumption, and how electrification, onsite and offsite renewable energy sources can achieve 100% renewable energy supply and net zero emissions. This is reflected in the updated ESD Report provided at Appendix F .	Appendix F
29	Section 4.7 of the Western Sydney Aerotropolis Precinct Plan requires development to target 6+ Green Star rating from 2026. Identify how this will be achieved for the development.	The project design will be reviewed and refined during design development in line with Section 4.7 of the Western Sydney Aerotropolis Precinct Plan requirements. As per the associated sustainable regenerative targets for Non-residential uses (subject to final modelling), a pathway to 6+ star Green Star will be considered. This is reflected in the updated ESD Report provided at Appendix F .	Appendix F

1.2 Western Sydney International Airport (WSIA)

Table 2 below identifies each of the matters raised by WSIA and sets out the Applicant's response to these submissions.

Table 2 Applicant Response to WSIA

No.	Issue Raised	Applicant Response	Reference
Aircraft Noise			
1	Office Buildings The Aviation Impacts Assessment (AIA) is to assess aviation noise using the ANEC from the State Environmental Planning Policy (Precincts – Western Parkland City) 2021.	The Updated Aviation Assessment Report (Appendix G) has been prepared to assess aviation noise using the ANEC from the State Environmental Planning Policy (Precincts – Western Parkland City) 2021.	Appendix G
2	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.	Noted and agreed.	N/A
Building Windshear and Turbulence			
3	Development in the 1:35 area The majority of Warehouse 3 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. It is noted that the application was referred to CASA for comment, however further information regarding the crane	Noted and agreed a condition of consent should be imposed as required.	N/A

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.

Wildlife Hazards

4	Development is within the wildlife buffers, and proposes features which could attract wildlife. 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 are being used to ensure that wildlife attraction risk is adequately addressed. 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.	The landscaping species list has been updated in the Updated Landscape Report (Appendix H) to consider the Aerotropolis DCP Landscape Species List.	Appendix H
5	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: - Design, management and monitoring of the onsite bio retention and sediment basins. - Landscaping species selection and maintenance.	The proposed development has been designed to minimise wildlife attraction. A Wildlife Hazard Assessment Letter prepared by Eco Logical Australia concludes that the proposed landscaping approach for the DHL site is consistent with the Burrah Park concept-wide Wildlife Hazard Assessment and Wildlife Hazard Management Plan.	Appendix C

	- The design and management of waste storage areas/receptacles during construction. - External handling and storage of organic materials. - Monitoring and management of any wildlife.	The DHL proposal includes five small, non-contiguous wetland features (across DHL Stages 1 and 2) that are amenity-focused, shallow (0.3 m depth), and do not function as water storage facilities. These wetlands are designed in accordance with Sydney Water Guidelines to reduce wildlife attractiveness and will be managed, monitored and adaptively mitigated under the Burrah Park Wildlife Hazard Management Plan. No additional or standalone Wildlife Hazard Assessment is required for the DHL site.	
6	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.	See above. Further engagement with Sydney Water is underway to confirm that the proposed basin designs are compliant with Sydney Water standards.	Appendix C
Lighting			
7	Development is within the Lighting Control Zones / Lighting Intensity Radius Area The site includes areas located within Lighting Control Zones B, C and D is wholly situated in the 6km Lighting Intensity Radius. Lighting on the site must not exceed an intensity of light for Zone	Noted and agreed a condition of consent should be imposed as required.	N/A

B – 50cd and for Zone C – 150 cd, and for Zone D – 450cd above the 3-degree horizontal plane.

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.

8	Where construction lighting is likely 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.	Noted and agreed a condition of consent should be imposed as required.	N/A
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Airspace Operations

11	OLS 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 of 81.6m, which includes the air conditioning units. 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 Airports Act 1996 covers any intrusions into prescribed airspace, which could include:	The height of the building in the report remains 14.6 m AGL. The building would not infringe on the OLS, and the assumed crane height (15 m above the building height) would also not infringe on the OLS. Notes have been added to the updated Aviation Impact Assessment (Appendix G) stating that once the crane operation details are available, the infringement of OLS needs to be reconfirmed.	Appendix G
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- 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.

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 Airports Act 1996 and the Airports (Protection of Airspace) Regulations 1996.

10

PANS-OPS

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 Airports (Protection of Airspace) Regulations permanent intrusions are prohibited and temporary intrusions are limited to three (3) months.

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.

An Updated Aviation Impact Assessment has been prepared by Aviation Projects which details the consultation undertaken with Airservices Australia. At the time of the updated assessment report, feedback was still pending further to an email sent out on 22 July 2025, since then a response was provide by Airservices on 5 December 2025 which conclude that:

"With respect to procedures designed by Airservices in accordance with ICAO PANS-OPS and Document 9905, at a height of 95.6m (314ft) AHD the property development and crane operations will not affect any sector or circling altitude, nor any instrument approach or departure procedure at Western Sydney aerodrome.

Appendix G

	<i>The property development and crane operations will not affect the Sydney RTCC.</i> <i>We have assessed the proposed activity to the above specified height for any impacts to Airservices Precision/Non-Precision Navigation Aids, Anemometers, HF/VHF/UHF Communications, A-SMGCS, Radar, PRM, ADS-B, WAM or Satellite/Links and have no objections to it proceeding.</i> <i>The proposed activity does not impact Airservices operations or facilities at Western Sydney aerodrome."</i> This is attached at Appendix G.
11 Crane use Impact on Prescribed Airspace 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 Airports (Protection of Airspace) Regulations. Approval to operate construction equipment (i.e. mobile and tower cranes) in the prescribed airspace should be obtained prior to any commitment to construct. Controlled Activity enquiries and applications should be directed to airspaceprotection@wsairport.com.au	An Updated Aviation Impact Assessment has been prepared by Aviation Projects which further to consultation with WSIA, concludes that the building would not infringe on the OLS, and the assumed crane height (15 m above the building height) would also not infringe on the OLS. Notes have been added to the report stating that once the crane operation details are available, the infringement of OLS needs to be reconfirmed. Additionally, feedback received from Airservices Australia on 5 December 2025 confirmed the below: <i>"With respect to procedures designed by Airservices in accordance with ICAO PANS-OPS and Document 9905, at a height of 95.6m (314ft) AHD the property development and crane operations will not affect any</i> Appendix G

sector or circling altitude, nor any instrument approach or departure procedure at Western Sydney aerodrome. The property development and crane operations will not affect the Sydney RTCC."

Communications, Navigation and Satellite systems

12	Proposal is in Glide Path Restricted Area, as shown in the Western Sydney Airport Plan Majority of warehouse 3 is within the Glide Path Trigger Assessment Area, assessment should be included in regard to the Glide Path Building Restricted Area.	The assessment is in Section 5.5.1 of the updated AIA (Appendix G). As there is no publicly available detailed information on the ILS location, no detailed assessment can be performed. Refer to the response provided by Airservices at Appendix H.	Appendix G Appendix H
13	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."	An Updated Aviation Impact Assessment has been prepared by Aviation Projects which details the consultation undertaken with Airservices Australia. At the time of the updated assessment report, feedback was still pending further to an email sent out on 22 July 2025, since then a response was provide by Airservices on 5 December 2025. Refer to the comment above and the response provided by Airservices at Appendix H.	Appendix G Appendix H
14	WSI will refer the application to Airservices Australia for assessment to conduct a formal assessment of potential impacts to Communications, Navigation and Satellite systems.	An Updated Aviation Impact Assessment has been prepared by Aviation Projects which details the consultation undertaken with Airservices Australia. At the time of the updated assessment report, feedback was still pending further to an email sent out on 22 July 2025, since then a response was provide by Airservices	Appendix G Appendix H

		on 5 December 2025. Refer to the comment above and the response provided by Airservices at Appendix H .	
15	The AIA refers to a Ground Base Augmentation System (GBAS), WSI will not be using GBAS.	This has been removed from the updated AIA (Appendix G).	Appendix G
16	Any assessment is to also include temporary intrusions such as cranes.	The updated AIA included the assumption of crane operation and a 15 m height assumption. The new runway elevation has been updated in the report.	Appendix G

Aviation Impact Assessment

17	Any analysis within the AIA should be revised in reference to the correct runway elevations as outlined on WSI's 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.	The new runway elevation has been reflected in the updated AIA (Appendix G).	Appendix G
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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	

1.3 Bradfield Development Authority

Table 3 below identifies the matters raised by BDA. BDA have no objection to the proposal.

Table 3 Applicant Response to BDA

No.	Issue Raised	Applicant Response	Reference
1	The Authority has reviewed the EIS and supporting documentation and provides the following comments for consideration of the Department of Planning, Housing and Infrastructure (the Department). The Authority generally supports both SSDs as it helps deliver the vision for the Western Sydney Aerotropolis.	Noted, BDA generally supports this SSDA.	N/A

1.4 Heritage NSW

Table 4 below identifies the matters raised by Heritage NSW and sets out the Applicant's response to these submissions.

Table 4 Applicant Response to Heritage NSW

No.	Issue Raised	Applicant Response	Reference
1	Provide Confirmation that the additional information request in relation to the Masterplan application (SSD-70316465) outlined in HMS 7874 have been met to the satisfaction of Heritage NSW and the Department	Responses to HNSW's comments are being progressed separately as part of the Burrah Park concept proposal (referred to as the Masterplan in HNSW's comment). Evidence of satisfaction of all comments being addressed will be provided in due course.	N/A
2	Provide confirmation of the approval of Masterplan	It is acknowledged that the DHL project approval would be subject to resolution of the Burrah Park Concept Proposal. (referred to as the Masterplan in HNSW's comment) is approved. Approval of the Burrah Park concept proposal, and its issuance to Heritage NSW will be provided in due course.	N/A
3	Provide evidence of consultation with the RAPS identified during the preparation of the ACHAR for the Masterplan to update them on the current project regarding the proposed site use and detailed design outlined in SSD 70818708.	Refer to the following documentation which were provided as part of the Burrah Park SSD 70316465 RtS, which provides evidence of consultation with the RAPS identified during the preparation of the ACHAR for the Masterplan: - Appendix Vi – Response to Heritage NSW Vol 1 of 2 - Appendix Vii Response to Heritage NSW Vol 2 of 2	Appendix Vi and Appendix Vii of the Burrah Park RtS

1.5 Conservation Programs, Heritage and Regulation Group (CPHR)

Table 5 below identifies the matters raised by CPHR and sets out the Applicant's response to these submissions.

Table 5 Applicant Response to CPHR

No.	Issue Raised	Applicant Response	Reference
Biodiversity			
1	Relevance of previous advice issued for Burrah Park EIS The EIS and accompanying biodiversity assessment rely on the assumption that the Burrah Park Concept Plan SSD-70316465 (the Concept Plan) will be approved prior to the determination of SSD70817958. The latter includes works such as demolition of existing structures, vegetation removal, bulk earthworks and stormwater infrastructure. The site is identified as certified urban capable land under the CPCP. However, should a decision on the Concept Plan mean that avoided, excluded, and/or transport corridor land is impacted by SSD70817958, advice regarding the CPCP could consequently change. CPHR recommendation: Should the Concept Plan be approved, the determining authority should refer the SSD back to CPHR. The referral should detail any changes to the location or size of the subject site and provide information to demonstrate the site is wholly on certified urban capable land under the CPCP."	It is acknowledged that the DHL project approval would be subject to resolution of the Burrah Park Concept Proposal. Approval of the Burrah Park concept proposal, and its issuance to CPHR and confirmation the site is certified urban capable land will be provided in due course.	N/A
2	CPCP Mitigation Measures Guideline	CPCP Mitigation Measures currently does not apply to the Greater Macarthur Growth Area,	

The biodiversity assessment needs to address the CPCP Mitigation Measure Guideline. An updated version of the Guideline was exhibited by the Department of Planning, Housing and Infrastructure (DPHI) in March 2025. Should this updated version be finalised prior to determination of the application, the updated CPCP Mitigation Measure Guideline should be addressed in the biodiversity assessment.

CPHR recommendation:

- The proponent should address the CPCP Mitigation Measure Guideline in an updated biodiversity assessment.

and Greater Penrith to Eastern Creek Investigation Area. The Burrah Park site is not within these areas. It is noted that once the updated CPCP Mitigation Measures come into effect, than it would apply to our site.

Flooding

3	Emergency Management Constraints The Flood Assessment refers to the Burrah Park Concept Plan Flood Assessment (Arcadis, September 2024). While the subject site would not be inundated by flooding, the subject site would be indirectly impacted by flooding as the Burrah Park site would be isolated by mainstream flooding from Cosgroves Creek, Badgerys Creek and Wianamatta-South Creek. Section 6 of the Flood Assessment, pages 69-70 states, <i>'The development design includes an access road to Elizabeth Drive. While the site itself remains flood-free up to and including PMF events, allowing occupants to stay on-site during flood events without the need for evacuation...</i> <i>For flood events exceeding the 1% AEP event, such as the 0.2% AEP flood, Elizabeth Drive will experience increased flood depths, making it unsafe for small vehicles. During a PMF event, Elizabeth Drive will be fully flooded, leaving no viable evacuation routes to the east or west. Consequently, it is essential</i>	A Flood Impact Assessment addendum that was prepared for the Burrah Park Concept Proposal as part of its respective assessment and RtS process concludes the following: Burrah Park and its evacuation route are flood-free in all modelled events, including the Probable Maximum Flood (PMF). The newly completed M12 Motorway provides a permanent, all-weather evacuation route that is unaffected by flooding, removing the earlier reliance on Elizabeth Drive, which could become non-trafficable in extreme events. Therefore, evacuation is achievable without dependence on early warning triggers or the need to shelter in place. The strategy aligns	N/A
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to either remain on-site until the flood event subsides or evacuate the site before the access route becomes impassable.'

As stated in Item 8 of CPHR's advice on the Concept Plan EIS, evacuation from the subject site via Elizabeth Drive to the west towards The Northern Road would only be available during flood events up to and including the 1% Annual Exceedance Probability (AEP) of Cosgroves Creek. During flood events greater than the 1% AEP this western route would be cut off for the subject site to access. Similarly, the route via Elizabeth Drive to the east would also be cut off by Badgerys Creek and Wianamatta-South Creek during 1% AEP and larger flood events.

Therefore, safe evacuation from the subject site must be undertaken before access is cut off by unsafe flood depths that are greater than 0.15 m on Elizabeth Drive.

Shelter in place is generally not recommended as the primary flood emergency response strategy for new greenfield development unless all 10 considerations in the Shelter in place guideline for flash flooding have been adequately addressed in the Flood Assessment. Addressing all 10 considerations will assist DPHI, as the consent authority, in determining whether shelter in place is an appropriate emergency management strategy for the subject site.

CPHR recommendation:

- The proponent should address item 8 of CPHR's advice on the Concept Plan EIS, which relates to emergency management as it also applies to the subject application. This is summarised as: The flood assessment demonstrates that evacuation can be undertaken from the subject site

with the NSW Flood Risk Management Guideline EM01 and SES guidance.

Lot-specific Flood Emergency Response Plans (FERPs) will be prepared at later design stages to formalise on-site procedures, SES communication protocols, and awareness of regional flash-flood conditions.

This also applies to the proposed development site, being within the Burrah Park Concept Plan.

consistent with the Local Flood Plan or State Emergency Service (SES) flood emergency strategy for the area.

- If evacuation is not feasible, the flood assessment must address the Shelter in place guideline for flash flooding (DPHI, 2025)."

Waterway Health and Stormwater Management

4 Inadequate Details for Assessment The proponent has not supplied a Water and Stormwater Management Plan (WSMP), MUSIC model or interim and ultimate stormwater design in the Civil Drawings. Without this information, CPHR is unable to assess and advise the consent authority on whether the proposal complies with the Western Sydney Aerotropolis Development Control Plan (DCP) 2022 waterway health and stormwater management targets. CPHR's previous comments on waterway health and stormwater management, provided on the Concept Plan EIS letter of advice, also apply to this SSD. Principally, the design details provided are inadequate for a proper assessment of compliance with the DCP stormwater targets CPHR recommendation: The proponent should: ▪ Provide a Water and Stormwater Management Plan, MUSIC model, interim and ultimate stormwater design in the Civil Drawings for this SSD. ▪ Address Item 9 of CPHR's advice on the Concept Plan EIS which relates to Stormwater Strategy as it also applies to this SSD; i.e. the proponent should provide correspondence from Sydney Water accepting full responsibility for ensuring the system achieves the DCP stormwater	The proposed DHL development (SSD-70818708) forms part of the broader Burrah Park Industrial Estate, which is the subject of the Concept and Stage 1 SSD-70316465. Stormwater quantity, water quality, reuse, detention and Waterway Health outcomes for the DHL lots are achieved through the estate-wide stormwater management system being designed and delivered as part of the Burrah Park concept proposal. Detailed assessment and coordination of the regional stormwater system, including interim and ultimate scenarios, MUSIC modelling, flow and water quality compliance, and basin and wetland design, is being progressed at the Burrah Park concept level in consultation with Sydney Water and DPHI and has been documented in the latest Henry & Hymas civil and stormwater compliance reporting.
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Appendix L

water quality and flow targets, or submits the full details as required by the Technical guidance for achieving Wianamatta–South Creek stormwater management targets, including:

- MUSIC Model
- flow duration Excel spreadsheet
- functional design drawings for each of the basin systems (clear plans and sections for each)
- wildlife hazard assessment for each waterbody.
- The proponent also includes a ‘references’ section to the Civil Engineering Report, providing full details of the references cited in the report.

The DHL lots are fully contained within this estate-wide framework and are required to provide only lot-level drainage and gross pollutant traps (GPTs) prior to discharge into the estate system. No on-lot detention, WSUD or MARV infrastructure is required as part of SSD-70818708. Accordingly, matters relating to the performance, staging and approval of the regional stormwater system are appropriately addressed through SSD-70316465. A Wildlife Hazard Assessment completed by Eco Logical Australia concludes that the small, amenity-focused wetland areas proposed within the DHL site are not water storage facilities, are consistent with the Burrah Park Wildlife Hazard Assessment, and will be managed under the Burrah Park Wildlife Hazard Management Plan.

1.6 Civil Aviation Safety Authority (CASA)

Table 6 below identifies the matters raised by CASA and sets out the Applicant's response to these submissions.

Table 6 Applicant Response to CASA

No.	Issue Raised	Applicant Response	Reference
1	CASA concurs with the conclusions at Section 15 (pages 56–58) of the Aviation Impact Assessment. Notwithstanding the Notes below; if the advice and recommendations in the Aviation Impact Assessment are implemented, the risk to aviation safety should be minimised. Provided that Airservices give the “all clear” with respect to Navigation Aids, CASA does not object to the proposed DHL Warehousing Facility (south)	Noted.	N/A
2	The drawings show roof mounted Air conditioners on Warehouse 03, indicating that the total height of the building might be marginally higher than the 80.6m (ridge height) used in the Aviation Impact Assessment. If the AC units are roof mounted near the ridge as shown on the drawings, Aviation Projects (or Airservices) should advise whether the units will make any difference with respect to the Glide Path BRA area shown on Figure 22 of the AIA.	The height of the building remains 14.6 m AGL, this is reflected in the updated Aviation Impact Assessment report at Appendix G .	Appendix G
			
3	The intent of the second dot point on page 57, vis:	Refer to the comment received and the respective response to WSIA with regard PANS-OPS assessment at Section 1.2 of this RtS Table.	N/A

• “Once the construction details can be provided before starting the procedure design, the height of the warehouse will be considered into the design and won’t affect the PANS-OPS surfaces.”

is difficult to understand (noting that this office is unaware of all the relevant timelines). Assuming that the instrument approach procedure(s) are operational before the cranes have started ... any infringement of PANS-OPS surfaces for more than 3 months (or less than 3 months without suitable mitigation) by a crane would present an unacceptable risk to the safety of air transport operations to and from Western Sydney International Airport.

4	Normally, an AIA would cover off on the potential for glare from sunlight reflecting off white roofs or solar panels. For example, the AIA could have confirmed that the glare from the sun setting in the west in summer would not be an issue for pilots approaching runway 23R.	As per the updated AIA (Appendix G), it is understood that glare assessments for flight paths are no longer required.	Appendix G
5	Regarding section 16 of the Recommendations in the AIA, it may be that details of the Project are not required to be published in En Route Supplement Australia (ERSA) or on aeronautical charts.	The updated AIA (Appendix G) has been updated accordingly.	Appendix G

1.7 Transport for NSW (TfNSW)

Table 7 below identifies the matters raised by TfNSW and sets out the Applicant's response to these submissions.

Table 7 Applicant Response to TfNSW

No.	Issue Raised	Applicant Response	Reference
1	It is noted that this SSD Project (SSD-70818708) is linked with the concept master plan for Burra Park (SSD-70316465) and seeks development consent for two (2) separate single storey warehouse and logistic buildings within part of the 25 hectares of Lot 1 DP 1306448, known as the DHL site. It is understood that SSD-70818708 represents the first of two State Significant Development Application (SSDA) proposed for Stage 1 of the southern half of the DHL site. It is noted that this SSD -70818708 relies on the approval of the concept master plan for Burra Park, in particular the approval and physical delivery by others of an access road intersection with Elizabeth Drive as this intersection facilitates vehicular access for all development within the master plan. As such, TfNSW is of the view that this SSD Project (SSD-70818708) should not be approved until such time that the Burra Park concept master plan (SSD-70316465) inclusive of an access road intersection with Elizabeth Drive is approved. As DPHI would be aware, TfNSW is continuing to work collaboratively with the Applicant of the Burra Park concept master plan to identify an appropriate location for the access	Noted, the concept master plan for Burrah Park SSD (SSD-70316465) and the access road intersection with Elizabeth Drive is being co-ordinated with TfNSW as part of the assessment process for the concept master plan. At the time of writing, TfNSW have confirmed that the access road intersection proposed under SSD-70316465 generally align, in principle, with the concept design developed for the Elizabeth Drive upgrade. Formal concurrence from TfNSW in support of the Burrah Park SSD is anticipated to be provided as part of the assessment process for the concept masterplan.	N/A

road intersection with Elizabeth Drive and full scope of road works required to accommodate the cumulative traffic generation of all development identified in the concept master plan for Burra Park.

TfNSW is willing to facilitate a meeting to discuss the matters raised above in further detail.

1.8 Fire and Rescue NSW (FRNSW)

Table 8 below identifies the matters raised by FRNSW. FRNSW have no objection to the proposal.

Table 8 Applicant Response to the FRNSW

No.	Issue Raised	Applicant Response	Reference
1	Conditions of consent recommended 1. Compliance is demonstrated with FRNSW fire safety guideline – Access for fire brigade vehicles and firefighters. Perimeter Vehicle Access must be provided at ground level and of an obvious and appropriate hardstand material. 2. It is the experience of FRNSW that the water demand for fire infrastructure servicing a development of this scope is unlikely to be supplied by mains water alone. FRNSW recommend that suitable design considerations are considered for the placement of tanks and other firefighting infrastructure if required. 3. That thorough analysis of the Fire Brigade Intervention Model is conducted to ensure that appropriate water supply is provided for hydrant and sprinkler systems. 4. Implement the applicable provisions of AS2419 Appendix C (informative). 5. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1. 6. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.	Noted.	N/A

1.9 Rural Fire Service (RFS)

Table 9 below identifies the matters raised by the RFS. RFS have no objection to the proposal.

Table 9 Applicant Response to RFS

No.	Issue Raised	Applicant Response	Reference
1	The RFS has no objections to the proposal, subject to compliance with the conditions recommended in the report prepared by Ecological dated 25 September 2024 reference 22SYD359.	Noted, RFS has no objections to the proposal.	N/A

1.10 Heritage Council

Table 10 below identifies the matters raised by the Heritage Council. Heritage Council have no objection to the proposal.

Table 10 Applicant Response to Heritage Council

No.	Issue Raised	Applicant Response	Reference
1	The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics. As this proposal relates to the previously determined concept approval SSD-70316465, therefore, no heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.	Noted, no heritage comments are required and the Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.	N/A

1.11 Penrith City Council

Table 11 below identifies the matters raised by the Penrith City Council and sets out the Applicant's response to these submissions.

Table 11 Applicant Response to Penrith City Council

No	Issue Raised	Applicant Response	Reference
Planning Considerations			
1	This application is premature until the concept SSD-70316465 application is determined and changes to infrastructure as currently included within the Penrith Aerotropolis CP have been agreed upon by Council. Subsequently, it is requested that a further opportunity to provide feedback is afforded to Council if amendments to the above SSD for Burrah Park are proposed/approved upon determination.	The design and development for the Burrah Park SSD, which of the time of writing is at the stage of RtS assessment, has been and will continue to be prepared so that there are no inconsistencies with this SSD. Any changes to the Burrah Park infrastructure will not impact the design and assessment of this SSD. With regard to any planning agreements and implications to the Penrith Aerotropolis CP, co-ordination is still being undertaken across the Burrah Park concept proposal applicant team (HBB & ISPT), DHL and the relevant government authorities. Clarity on whether any planning agreement will be established for this DHL application (SSD-70818708) will be resolved prior to the finalisation and determination of this application.	N/A
2	Council provided an extensive submission about the Burrah Park Warehousing and Logistics Estate in a letter issued to the	The design and development for the Burrah Park Concept Proposal SSD, which of the time of writing is at the stage of RtS assessment, has been and will continue	N/A

	Department on 19 December 2024 under SSD-70316465. The comments raised in that submission shall be considered.	to be prepared so that there are no changes or amendments to this SSD. All matters raised in Council's extensive submission to the Burrah Park will be managed and assessed as part of the Burrah Park Concept Proposal SSDA progress.	
3	The car parking areas do not provide tree planting at intervals of every five car parking spaces, as required by clause 2.4.4 – PO6 of the Aerotropolis DCP. The design of the mezzanine car park does not permit tree planting as required by the DCP. The proposed landscaped cut-outs are insufficient to meet the Performance Outcomes of the DCP, and this design does not address urban heat.	Consistent with the Burrah Park concept proposal, a performance-based approach to development requirements has been adopted with the performance outcome for tree canopy coverage requiring 'sufficient tree planting' while also addressing the Western Sydney International Airport Wildlife Mitigation Measures (DCP 2.10.3). The design has been prepared to ensure tree clusters of < 5 are maintained with spacing of 2-6 m to avoid continuous canopy and higher wildlife attracting risk. Notably, trees with canopy not touching at maturity, but planted very close (e.g. 1 m between canopy) would still create continuous wildlife that may encourage bird/bat use, which is why greater spacing between clusters has been provided. The development design has been prepared to maximise on-lot tree canopy coverage while also addressing this balance of considerations, and this aligns with the strategy adopted for the Burrah Park concept which is being progressed to deliver an acceptable canopy cover across the estate. It is noted that the updated clustering of trees results in a reduction in tree canopy density the updated	Appendix B Appendix E

		landscape design results in a tree canopy coverage of 13.2%.	
4	d) In addition, clause 2.7 of the DCP (PO8) refers to parking at grade "or if provided above the ground floor level within a building". The proposed upper-level parking is not integrated into the building. This, coupled with the lack of tree planting, is a poor urban design and streetscape outcome.	All elements of the proposed buildings meet the setback requirements in Table 6 of the Western Sydney Aerotropolis Development Control Plan (Aerotropolis Phase 2 DCP). Notably, the two storey car park structures are proposed to be set back 7.5m, compliant with the DCP requirement. Refer to Section 3.2.1 of the RtS Report and the updated Architectural Plan at Appendix B .	Section 3.2.1 of the RtS Report and the updated Architectural Plan at Appendix B
City Planning Considerations			
5	Penrith Aerotropolis Development Contributions Plan 2023 (Penrith Aerotropolis CP) The Penrith Aerotropolis Development Contributions Plan 2023 (Penrith Aerotropolis CP) applies to the site subject to this SSD Application at a rate of 5.6%.	Noted and agreed.	N/A
6	Page 105 of the EIS states that "Contributions plans have not been finalised for the site but are expected to be in place by the time the application is determined." This is incorrect. The Penrith Aerotropolis CP came into effect on 14 August 2024 and applies to the site subject to this SSD Application.	The contribution plans in place are as follows: - The Western Sydney Growth Areas Special Infrastructure Contribution (SIC) which came into effect on 14 January 2021. - The Penrith Aerotropolis Development Contributions Plan formally adopted by Council on 23 July 2024 and came into effect on 14 August 2024.	Section 4.4 of the RtS Report.

		With regard to any planning agreements, co-ordination is still being undertaken across the Burrah Park concept proposal applicant team (HBB & ISPT), DHL and the relevant government authorities. Clarity on whether any planning agreement will be established for this DHL application (SSD-70818708) will be resolved prior to the finalisation and determination of this application, provided to DPHI as soon as it is able.	
7	Relationship with SSD-70316465 (Burrah Park) It is noted that the approval of this SSD Application is reliant on the approval of the Concept SSD Application 70316465 Burrah Park (Burrah Park SSD).	The Burrah Park concept proposal is currently under assessment and is subject to ongoing design and environmental assessment refinements in response to government authority requirements and comments. Notwithstanding, this DHL application (SSD-70818708) has been updated to reflect the latest version of the Burrah Park concept proposal to facilitate its timely assessment and progression.	N/A
8	There is a concern that if the design for SSD 70316465 changes, amendments to this SSD may be required and could warrant further changes to the overall design, particularly relating to the proposed road network and changes to infrastructure included within the Penrith Aerotropolis CP.	The design and development for the Burrah Park SSD, which of the time of writing is at the stage of RtS assessment, has been and will continue to be prepared so that there are no changes or amendments to this SSD. Any changes to the Burrah Park infrastructure will not impact the design and assessment of this SSD. With regard to any planning agreements and implications to the Penrith Aerotropolis CP, co-ordination is still being undertaken across the Burrah Park concept proposal applicant team (HBB & ISPT), DHL	N/A

		and the relevant government authorities. Clarity on whether any planning agreement will be established for this DHL application (SSD-70818708) will be resolved prior to the finalisation and determination of this application.	
9	The Burrah Park SSD proposes changes to the infrastructure planned within the Penrith Aerotropolis CP, in particular, a Collector Road is proposed in place of a Sub-Arterial Road and Culvert. This proposed road, although not included in the site area for SSD-70818708 is directly adjacent to Superlot 4a, and forms part of the broader road network to support the facility. The proposed Collector Road has not been agreed upon by Council and Council is yet to receive evidence of concurrence with this approach from TfNSW (as stated in SSD 70316465)	The design and assessment of the Collector Road, in place of a Sub-Arterial Road and Culvert, is being managed and assessed as part of the Burrah Park SSD. This includes the relevant correspondence with Council and/or any concurrence from TfNSW, they will be addressed as part of the Burrah Park SSD. As it relates to this SSD, the infrastructure has been and will continue to be prepared to ensure there is the appropriate access across the entire Burrah Park, including the site subject to this SSD.	N/A
10	The Infrastructure Staging and Delivery Plan included in SSD-70316465 advised that the proponent was negotiating with Council regarding entering into a VPA for the site. It should be noted that these negotiations have not formally progressed and therefore the Penrith Aerotropolis Development Contributions Plan 2023 with a rate of 5.6% continues to apply	Any planning agreements and implications to the Penrith Aerotropolis CP, co-ordination is still being undertaken across the Burrah Park concept proposal applicant team (HBB & ISPT), DHL and the relevant government authorities. Clarity on whether any planning agreement will be established for this DHL application (SSD-70818708) will be resolved prior to the finalisation and determination of this application.	N/A
11	Conditions of consent Upon determination of this SSD, if approved, it is requested that the two conditions below be included within the conditions of	Noted.	N/A

consent in line with the attached quote for development contributions under the Penrith Aerotropolis CP:

- a. Pursuant to section 7.12 of the Environmental Planning and Assessment Act 1979 and the Penrith Aerotropolis Development Contributions Plan 2023 (Contributions Plan), a monetary contribution of \$5,324,273 shall be paid to Penrith City Council. The amount paid is to be adjusted at the time of the actual payment in accordance with the provisions of the Contributions Plan. The Contribution is to be paid prior to the issue of a Subdivision Certificate or Construction Certificate, whichever occurs first. An application for deferred or periodic payment may be considered by the Council in accordance with the provisions of the Contributions Plan.

12	b. Prior to the issue of an Occupation Certificate, a post completion review of construction costs, prepared by a Quantity Surveyor (who is a registered member of the Australian Institute of Quantity Surveyors) or a Chartered Professional Accountant, is to be provided to Council specifying the actual cost of works. Where the actual cost of works exceeds that for which the contributions were calculated predevelopment, the shortfall is to be paid prior to the issue of the Occupation Certificate.	Noted and agreed.	N/A
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A copy of the Contributions Plan is available on Council's website.

Note: This development contribution may be satisfied by a voluntary planning agreement entered into between the Council and the Applicant. "

Development Engineering Considerations

13	This application has been reviewed in conjunction with the Burrah Park Estate application SSD-70316465 that sets the concept master plan and Stage 1 development delivering the earthworks, external and internal roads, infrastructure and regional stormwater management systems.	Noted.	N/A
14	The subject proposal is premature as it is reliant on the parent subdivision application (SSD-70316465) to be approved for the delivery of significant infrastructure. Also, the Sydney Water Scheme Plan needs to be finalised as the site will drain into the future Sydney Water infrastructure and rely on these measures to comply with the water quality requirements.	The proposed DHL development (SSD-70818708) forms part of the broader Burrah Park Industrial Estate, which is the subject of the Concept and Stage 1 SSD-70316465. Delivery of estate-wide infrastructure, including regional stormwater management works coordinated with Sydney Water, is being assessed and finalised as part of the Burrah Park concept proposal. Stormwater quality and quantity outcomes for the DHL lots are achieved through the estate-wide stormwater management system, with the DHL development required to provide only lot-level drainage infrastructure and gross pollutant traps (GPTs) prior to discharge into the estate system. No on-lot detention, WSUD or MARV infrastructure is required as part of this SSDA. Accordingly, matters relating to the approval, staging and finalisation of the Sydney Water stormwater scheme are appropriately addressed through SSD-70316465. The DHL proposal has been updated to remain consistent with the latest Burrah Park concept	N/A

		design and does not pre-empt or prejudice the assessment of the parent application.	
15	Further, the proposed development is reliant on the proposed wetlands and bio-retention basin system (Basin B) which is part of the parent subdivision to manage the stormwater as it does not propose on lot onsite stormwater detention systems.	As above, the DHL development (SSD-70818708) is designed to operate within the estate-wide stormwater management framework being delivered as part of the Burrah Park Concept and Stage 1 SSD-70316465. Consistent with the approved design approach for the estate, stormwater from the DHL lots will drain to the regional wetlands and bioretention system (Basin B), which forms part of the parent subdivision. The design and performance of Basin B and the broader regional stormwater system are being assessed and coordinated with Sydney Water as part of the Burrah Park concept proposal. The DHL application has been updated to remain consistent with the latest estate design and does not seek to duplicate or pre-empt the assessment of the parent subdivision.	N/A
16	The submitted EIS and Transport and Accessibility Impact Assessment reports suggest that the subject development can be delivered independently of the Burrah Park SSD-70316465 by providing a temporary access easement over an existing dirt road off Elizabeth Drive. There is no further detail provided on this proposal and would require further assessment in particular TfNSW for the use of a temporary access on Elizabeth Drive.	The temporary access is for construction access only. Noted with respect to Council's comment as it is an issue to be resolved with TfNSW.	N/A

Traffic Considerations

17	Clarification is required regarding compliance of westernmost proposed truck exit with respect to its proximity to the adjacent intersection. No clear dimensions are given for assessment purposes regarding distance from the intersection.	The westernmost proposed truck exit is approximately 30 metres away from the roundabout. Refer to Appendix A drawing 12 of 29 of the Updated TIA.	Appendix I
18	The architectural plans are not of sufficient detail (dimensions not provided for assessment purposes) to assess whether compliance with AS2890.2 has been demonstrated regarding all proposed truck entry/exit driveways.	Dimensions have been provided in updated architectural plans and Stantec's design review. Refer to Appendix A of the Updated TIA.	Appendix I
19	The architectural plans are not of sufficient detail (dimensions not provided for assessment purposes) to assess whether compliance with AS2890.1 has been demonstrated regarding car parking areas.	Dimensions have been provided in updated architectural plans and Stantec's design review. Refer to Section 6.4 and Appendix A of the Updated TIA.	Appendix I
20	The application does not state clearly that access and parking comply with AS2890.1, AS2890.2 and AS2890.6, but rather states that the site is expected to operate efficiently and safely, with heavy vehicle movements separated from light vehicle movements. Due to a lack of detail, it is not clear where non-compliances exist in this regard.	Refer to Section 6.4 of the Updated TIA – the architectural plans have been reviewed against the AS2890 series and are generally compliant with the requirements. Car parking design is subject to change as part of the detailed design. We recommend this be addressed with a standard consent condition (i.e. traffic engineer to certify that the detailed design complies with AS2890 series prior to construction).	Appendix I
21	Any internal driveway access gates/boom-gates/etc. must be positioned internally such that a full vehicle length (of the largest vehicle designated to use the corresponding entrance) can be accommodated wholly within the site and not queue on the	Refer to Updated Architectural Drawings. At the entry points, boom-gates will be located well within the site to provide sufficient storage for one B-Double vehicle.	Appendix B

	public roadway. It is not clear from the application whether this has been achieved.		
22	The Transport and Accessibility Impact Assessment report notes that with the intersection between Elizabeth Road/ Luddenham Road will operate at LOS F with or without the Burrah Park development. The associated data has not been included in the report. The report recommends the signalisation of the intersection to alleviate the congestion along Luddenham Road with reference to the Elizabeth Drive Upgrade REF documentation which suggests this intersection will be upgraded to a signalised intersection. However, the timing of this upgrade is uncertain, and Council has concerns about the operation of the intersection.	The results of this assessment and the respective commentary are as per the Arcadis traffic assessment prepared as part of the Burrah Park concept proposal SSDA. This is a matter that will continue to be assessed and resolved at an estate level as part of the concept proposal. Note, it is acknowledged that the DHL project approval would be subject to resolution of the Burrah Park Concept Proposal, including resolution of all traffic and access considerations.	N/A
23	A CTMP (construction traffic management plan) will be required for assessment/concurrence by Council, including detailed TGSs (traffic guidance schemes).	An Overview CTMP has been included in Section 9 of the Updated TIA. Construction methodology is subject to change and we recommend this is addresses with a standard condition of consent.	Appendix I
24	Applications for development in this precinct (under the 'Western Sydney Aerotropolis Precinct Plan') must provide, as part of the development application, confirmation that Transport for NSW (TfNSW) is satisfied that the proposal: i. ii. i) Provides road infrastructure to support the development, which is consistent with the precinct plan, and; Can connect to and integrating with existing and planned road infrastructure.	The results of this assessment and the respective commentary are as per the Arcadis traffic assessment prepared as part of the Burrah Park concept proposal SSDA. This is a matter that will continue to be assessed and resolved at an estate level as part of the concept proposal. Note, it is acknowledged that the DHL project approval would be subject to resolution of the Burrah Park Concept Proposal, including the resolution of all traffic and access considerations.	N/A

25	In undertaking its assessment, according to SEPP (Western Sydney Aerotropolis) 2020, Section 29, TfNSW should consider: i. "The appropriateness of the development in relation to planned infrastructure on transport corridor land", as well as; ii. iii. "The timing of the carrying out of the proposed development and the timing for constructing infrastructure on transport corridor land", as well as; "The effect of the development on planned infrastructure".	The results of this assessment and the respective commentary are as per the Arcadis traffic assessment prepared as part of the Burrah Park concept proposal SSDA. This is a matter that will continue to be assessed and resolved at an estate level as part of the concept proposal. Note, it is acknowledged that the DHL project approval would be subject to resolution of the Burrah Park Concept Proposal, including resolution of all traffic and access considerations.	N/A
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Environmental Considerations

26	It is noted that remediation of contamination is required. A Validation Report must be submitted to both DPHI and Council on completion of works confirming that remediation has been successful and that the site is suitable for the proposed use. This information can then be added to the Planning Certificate.	Noted, this can be appropriately conditioned as part of any consent.	N/A
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Waterways Considerations

27	The site is in the proposed Burrah Park estate development (SSD70316465) which once approved will provide earthworks, road access, lead-in services, stormwater drainage, regional WSUD systems and other infrastructure, for this application (SSD-70818708). In addition to the regional stormwater management measures a gross pollutant trap (GPT) is proposed for each lot, within the lot and immediately upstream of the estate road drainage discharge point.	The proposed DHL development (SSD-70818708) is located within the Burrah Park Industrial Estate and relies on estate-wide infrastructure, including regional stormwater management works, to be delivered as part of the Concept and Stage 1 SSD-70316465. Stormwater quality, flow and Waterway Health outcomes for the DHL lots are achieved through the estate-wide stormwater management system, which includes regional WSUD measures and detention	N/A
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The parent subdivision application (SSD-70316465) needs to be approved prior to this application being assessed. The Sydney Water Scheme Plan also needs to be finalized. This will be important as the site will drain into the infrastructure and rely on the measures to comply with the waterway health requirements.

With respect to the stormwater approach for the parent subdivision SSD70316465, the BCS noted that the stormwater design details provided for the proposed regional water management infrastructure are inadequate for BCS to assess compliance with the Western Sydney Aerotropolis Development Control Plan (DCP) 2022 stormwater water quality and flow targets.

It is also noted that Sydney Water's Scheme Plan for the precinct is yet to be finalised. This is important as this development relies on the precinct stormwater drainage and associated stormwater treatment for the site to meet the waterway health requirements.

Based on the above comments, it is suggested that the application is premature and that alternative interim measures (prepared in accordance with the Technical guidance for achieving the Wianamatta South Creek stormwater management targets, would be required until the ultimate stormwater management measures are in place in the case the development is approved.

Based on the above comments, it is suggested that the application is premature and that alternative interim measures (prepared in accordance with the Technical guidance for achieving the Wianamatta South Creek stormwater

infrastructure. Consistent with the Burrah Park design framework, each DHL lot will provide only lot-level drainage infrastructure and a gross pollutant trap (GPT) prior to discharge into the estate drainage network. No on-lot detention, WSUD or additional interim stormwater measures are required for the DHL development.

Detailed assessment of the regional stormwater system, including interim and ultimate scenarios, compliance with Aerotropolis DCP water quality and flow targets, and coordination with Sydney Water, is being progressed as part of the Burrah Park concept proposal and has been documented in the latest Henry & Hymas civil and stormwater compliance reporting submitted to Sydney Water and DPHI.

The DHL application has been updated to remain consistent with the latest Burrah Park concept design and does not seek to pre-empt or duplicate the assessment of the parent subdivision. Accordingly, matters relating to the adequacy, staging and approval of the regional stormwater system are appropriately addressed through SSD-70316465.

management targets, would be required until the ultimate stormwater management measures are in place in the case the development is approved.

28	Based on a review of the above documentation, the proposal is not supported in its current form with respect to Waterway Health matters. The information provided in the Civil Report and supporting information has not demonstrated compliance with the DCP waterway health controls.	Stormwater quality, flow and Waterway Health compliance for the DHL development are addressed through the estate-wide stormwater management system being progressed as part of the Burrah Park Concept and Stage 1 SSD-70316465. The Burrah Park Concept Masterplan is currently updating the interim Stage 1 and benchmark ultimate scheme civil plans and MUSIC modelling in consultation with Sydney Water. These plans have been issued to Sydney Water for review, and the DHL development will continue to rely on and remain consistent with the estate-wide stormwater framework.	Appendix L
29	With respect to the regional stormwater scheme, it is suggested that this should all be resolved prior to developing the lots associated with the subdivision. Alternatively interim stormwater treatments measures should be provided in accordance with the Technical guidance for achieving Wianamatta South Creek stormwater management targets.	Resolution of the regional stormwater scheme, including interim and ultimate measures in accordance with the Technical Guidance for Achieving Wianamatta–South Creek Stormwater Management Targets, is being undertaken as part of the Burrah Park Concept and Stage 1 SSD-70316465. The Burrah Park Concept Masterplan is updating the relevant civil plans and MUSIC modelling in consultation with Sydney Water, and the DHL development will be delivered in accordance with the estate-wide stormwater management system.	Appendix L

30	In the case the development proposal is approved, conditions need to be applied to ensure that the on lot GPT's and associated infrastructure will be the responsibility of the developer / property owners to maintain (i.e., they cannot be dedicated to Council). It is suggested that a positive covenant be applied to the satisfaction of the Drainage Manager.	Noted.	N/A
31	With respect to waterways, it is noted that a mapped waterways are located on the site. Any works will need to be undertaken in accordance with Water Management Act and the Department of Climate Change, Energy, the Environment and Water (DCCEEW) requirements.	Mapped waterways within the Burrah Park estate, and any associated works, are being assessed and managed as part of the Burrah Park Concept and Stage 1 SSD-70316465 in accordance with the Water Management Act and relevant DCCEEW requirements. The DHL development will be delivered in accordance with the estate-wide civil and stormwater framework and does not propose any works to mapped waterways outside that assessment.	Appendix L
32	Regarding salinity, it is noted that permeable paving may be used in some areas. The use of these should only be undertaken with the support of a Salinity assessment to ensure no adverse impacts.	Noted, this can be appropriately conditioned as part of any consent.	N/A
33	High efficiency sediment basins are required to be provided meet the construction phase IWCM controls in the Aerotropolis DCP. Conditions will need to be included in the consent that requires high efficiency sediment basins to be used during the construction stages of the development, and that they are designed and audited by a CPESC as per the Technical guidance	Construction-phase erosion and sediment control measures, including the provision of high-efficiency sediment basins and CPESC-certified design and auditing where required, are being addressed as part of the Burrah Park Concept and Stage 1 SSD-70316465 in accordance with the Aerotropolis DCP and the Technical Guidance for Achieving Wianamatta–South	Appendix L

for achieving Wianamatta South Creek stormwater management targets.

Creek Stormwater Management Targets. The DHL development will be delivered in accordance with the estate-wide construction and erosion and sediment control framework.

1.12 Sydney Water

Table 12 below identifies the matters raised by the Sydney Water and sets out the Applicant's response to these submissions.

Table 12 Applicant Response to Sydney Water

No.	Issue Raised	Applicant Response	Reference
Water Servicing			
1	The proposed development is within the Cecil Park Water Supply Zone (WSZ). This WSZ has limited capacity to service ongoing development in this area.	Noted.	N/A
2	Sydney Water continues to deliver trunk upgrades in this part of the system (including a 750mm main along this part of Elizabeth Drive) but there may be limited capacity in the short term to service this development	Noted.	N/A
3	Amplifications, adjustments, deviations and/or minor extensions may be required.	Noted.	N/A
4	Detailed requirements will be provided at the Section 73 application stage.	Noted.	N/A
Recycled Water Servicing			
5	The proposed development is located within the Northern Gateway precinct, one of the Aerotropolis Initial Precincts. Recycled water services will be available for this development via a proposed recycled water scheme supplied from Upper South Creek	Noted.	N/A

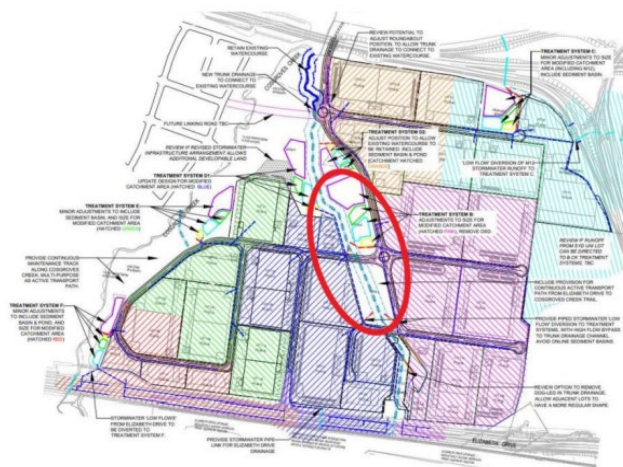
	Advanced Water Recycling Centre (AWRC). The scheme is expected to be in operation from 2031.		
6	Sydney Water is currently finalising the preferred configuration of the recycled water scheme, including sizing the trunk mains and facilities, based on available growth data and demand assumptions. The assets, sizes, locations and alignments required for the development will be confirmed once the preferred option is finalised and the structure plan and recycled water demand of the development is understood. Each lot will be required to have a recycled water main at the frontage, appropriately sized for connection to the recycled water main.	Noted.	N/A
8	As noted above, the recycled water scheme for the Aerotropolis Initial Precincts is expected to be completed by 2031. Interim services will utilise the drinking water network, when available. There is currently limited drinking water network capacity for this location. Also, the interim servicing will be limited to non-potable demand for indoor use only. The irrigation demand must be supplemented using the onsite stormwater harvesting and reuse until the recycled water scheme is commissioned in 2031. The following requirements must be met prior to obtaining RW connection approval: ▪ Smart meter installation, ▪ Confirmation of the indoor and irrigation demands from the developer.	Noted.	N/A

9	Once the stormwater and recycled water supply is established, the connections between the potable water and recycled water networks will need to be decommissioned. The developer must clearly show the locations of any cross connections between the potable water network and recycled water network on the design plans which need to be reviewed by Sydney Water. The developer must also provide to Sydney Water the finished surface levels.	Noted.	N/A
Wastewater Servicing			
10	There are currently no wastewater services available in this area	Noted.	N/A
11	The proposed development is located within the Cosgroves Creek wastewater catchment and will be serviced by the Cosgroves Creek Carrier which will pump to wastewater pumping station SPI246. Wastewater pumping station SPI246 and the Cosgroves Creek Carrier will transfer flows to the proposed Upper South Creek AWRC.	Noted.	N/A
12	The trunk wastewater assets are currently in detailed design. Assets within the Cosgrove Creek catchment are planned to be delivered by 2026/27, subject to funding approval and contractors' delivery schedule.	Noted.	N/A
13	Amplifications, adjustments, deviations and/or minor extensions may be required.	Noted.	N/A

14	Detailed requirements will be provided at the Section 73 application stage.	Noted.	N/A
Stormwater Servicing			
15	Sydney Water does not endorse the development application on matters relating to stormwater and requests additional information for assessment. Attachment 1 provides details on what actions are required to meet these requirements.	Noted.	N/A
Next Steps			
16	The proponent is required to address the stormwater comments and requirements requested in Attachment 1."	Noted.	N/A
17	The Department of Planning, Housing and Infrastructure (the Department) is advised to re-refer this SSDA to Sydney Water for review once stormwater issues have been addressed.	Noted.	N/A
18	Given the scale and complexity of the proposed development, further investigations will be required to determine the servicing requirements for this site. It is recommended that a Water Servicing Coordinator is engaged as soon as possible, and a Feasibility or Anticipated Section 73 application is submitted with Sydney Water. Anticipated Section 73 applications can be registered with Sydney Water once a development application has been lodged with the relevant consent authority.	Water servicing investigations for the DHL development are being progressed within the context of the broader Burrah Park Concept and Stage 1 SSD-70316465, including coordination with Sydney Water on trunk servicing, staging and capacity. Engagement with Sydney Water, including preparation of relevant servicing applications, will occur in accordance with the approved estate-wide servicing strategy and at the appropriate stage of delivery.	Appendix L

19	The proponent should complete and return the enclosed Growth Data Form as part of their Feasibility or Anticipated Section 73 application. The Growth Data Form should be updated promptly with Sydney Water in case of changes.	Growth and demand information for the DHL development will be provided to Sydney Water as part of the relevant Feasibility or Anticipated Section 73 application, in coordination with the broader Burrah Park Concept and Stage 1 SSD-70316465. Any updates to growth data will be submitted in accordance with Sydney Water's requirements and the approved estate-wide servicing strategy.	Appendix L
20	The Department is advised to forward the enclosed Sydney Water Development Application Information Sheet (for proponent) to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions.	Noted.	N/A
21	Attachment 1 Sydney Water has provided a response for the Burrah Park Concept Masterplan SSD70316465 which describes the Regional Stormwater Scheme plan for Burrah Park. At this stage, Sydney Water has not received any feedback or comments about the Regional Scheme Plan submitted. SSD-70316465 does not provide any detailed information about the staging of the construction of the stormwater infrastructure. Sydney Water advises that the stormwater infrastructure within Burrah Park is to be built in conjunction with the construction of the warehouses to retain run-off from impervious surface and to meet the Wianamatta targets.	The regional stormwater scheme for Burrah Park, including staging, functional design of stormwater infrastructure, and compliance with Aerotropolis DCP water quality and flow targets, is being assessed and finalised as part of the Burrah Park Concept and Stage 1 SSD-70316465 in consultation with Sydney Water. This includes the preparation of the required functional design documentation, MUSIC modelling and stormwater and water management planning in accordance with Sydney Water's Engineering Requirements. The DHL development will be constructed in accordance with the estate-wide stormwater framework, including	Appendix L

The current documents provided for SSD-70818708 do not demonstrate that the DHL warehouses meet the DCP requirements for stormwater quality targets and stormwater flow targets. Sydney Water requests that the construction of the DHL warehouses follows the general plan described in Concept Masterplan SSD-70316465 and includes all the specifications for stormwater conveyance and treatment through Basin B per the map below.



stormwater conveyance and treatment through Basin B, and does not seek to duplicate or pre-empt the assessment of the regional stormwater scheme through SSD-70818708.

As part of the EIS exhibition, Sydney Water expects a 50%-75% functional design of the related stormwater infrastructure. The details of the information to provide are listed in the published Engineering Requirements Checklist.

Besides the 50%-70% functional design, a stormwater and water management plan is to be provided. It must also be specified that all street trees are to be passively irrigated."

1.13 Endeavour Energy

Table 13 below identifies the matters raised by Endeavour Energy. Endeavour Energy have no objection to the proposal.

Table 13 Applicant Response to Endeavour Energy

No.	Issue Raised	Applicant Response	Reference
1	Based on and subject to the foregoing Endeavour Energy has no objection to the Development Application. Should you wish to discuss this matter, or have any questions, please do not hesitate to contact me or the contacts identified above in relation to the various matters. Due to the high number of development application / planning proposal notifications submitted to Endeavour Energy, to ensure a response contact Property.Development@endeavourenergy.com.au is preferred. by	Noted, Endeavour Energy has no objection.	N/A

1.14 Public Submissions

Table 14 below identifies the matters raised by public submissions. The public submission received by Melissa Vassiliou – Erskine Park is in support of the proposal

Table 14 Applicant Response to Public Submissions

No.	Issue Raised	Applicant Response	Reference
1	Melissa Vassiliou – Erskine Park I support the intent of the DHL Stage 1 development (SSD-70818708) at 1953–2109 Elizabeth Drive, Badgerys Creek, within the Northern Gateway Precinct of the Western Sydney Aerotropolis but believe improvements are needed to ensure it delivers real benefits for the local community. This includes stronger local employment and training commitments, better interim transport access, integration of shared community or cultural infrastructure, and ongoing engagement with Dharug Traditional Custodians. With these enhancements, the proposal can better align with the values of equitable, place-based development in Western Sydney.	Noted.	N/A