

ALDI ADC

Modification 1

June 2026

Prepared for: ALDI Foods Pty Ltd



Urbis staff responsible for this report were:

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Project Code	P0051669
Report Number	For Lodgement

Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Contents

Executive Summary	5	7.3 Statutory Context	43
Proposed Modifications	5	7.4 Community Views	44
Engagement	6	7.5 Likely Impacts of the Modified Proposal	44
Justification of the Modified Project	6	7.6 Suitability of the Site	45
1 Introduction	8	7.7 Public Interest	46
1.1 Applicant Details	8	Disclaimer	47
1.2 Project Background	8		
1.3 Project Overview	9		
2 Strategic Context	11		
2.1 Project Justification	11		
2.2 Key Features of Site and Surrounds	12		
3 Description of modifications	16		
3.1 Overview	16		
3.2 Mezzanine Level	16		
3.3 Energy Centre 1	17		
3.4 Energy Centre 2	18		
3.5 Energy Centre 3	20		
3.6 Louvres	21		
3.7 Summary of Changes	21		
3.8 Proposed Amendments to Conditions of Consent	23		
3.9 Substantially the Same Development	24		
4 Statutory Context	26		
4.1 Statutory Requirements	26		
4.2 Pre-Conditions	27		
4.3 Mandatory Considerations	33		
5 Engagement	37		
6 Assessment of Impacts	39		
6.1 Minor Assessment Impacts	39		
6.2 Other Environmental Impacts	40		
6.3 Minimal Environmental Impact	41		
7 Justification of Modified Project	43		
7.1 Project Design	43		
7.2 Strategic Context	43		

Appendices

Appendix A – Updated Architectural Plans	
Appendix B – Traffic Statement	
Appendix C – Noise Statement	
Appendix D – Architectural Statement	
Appendix E – Clean Architectural Plans	

Figures

Figure 1 Development Location within IPG Master Plan Lot Layout (Shown in Red)	8
Figure 2 Mezzanine Level	17
Figure 3 Energy Centre 1 (Changes in red cloud)	18
Figure 4 Energy Centre 2 (Changes in red cloud)	19
Figure 5 Energy Centre 3	20
Figure 6 Louvres	21

Pictures

Picture 1 Approved Mezzanine	17
Picture 2 Amended Mezzanine (Ref: D110-Mezzanine Level 1 Rev 1)	17
Picture 3 Approved Energy Centre 1	18
Picture 4 Proposed Energy Centre 1	18
Picture 5 Approved Energy Centre 1	18
Picture 6 Amended Energy Centre 1	18
Picture 7 EC2 Approved Footprint	19
Picture 8 EC2 Amended Footprint	19
Picture 9 EC2 Approved Roof Plan	19
Picture 10 EC2 Amended Roof Plan	19
Picture 11 EC2 Approved Elevation	19
Picture 12 EC2 Proposed Elevation	19
Picture 13 EC3 Approved Footprint	20
Picture 14 EC3 Amended Footprint	20
Picture 15 EC3 Approved Elevation	20
Picture 16 EC3 Amended Elevation	20
Picture 17 EC3 Approved Section	21
Picture 18 EC3 Amended Section	21
Picture 19 Approved North Elevation	21
Picture 20 Approved South Elevation	21

Picture 21 – Amended Louvres (in red clouds) – North Elevation	21
Picture 22 Amended Louvres (in red clouds) – South Elevation	21

Tables

Table 1 Applicant Details	8
Table 2 Site Description	12
Table 3 Comparative Task	22
Table 4 Identification of Statutory Requirements for the Project	26
Table 5 Pre-conditions	27
Table 6 Mandatory Considerations	33
Table 7 Minor Assessment Impacts	39

Executive Summary

This Modification Report has been prepared by Urbis Ltd on behalf of ALDI Foods Pty Ltd (**the Applicant**) pursuant to section 4.55(1A) of the Environmental Planning and Assessment Act 1979 (**EP&A Act**). The application seeks to modify Development Consent SSD-76913969 for the ALDI Automated Distribution Centre (**ADC**) 475 Badgerys Creek Road, Bradfield NSW 2556 (**the site**).

On 26th February 2026, the Minister for Planning and Public Spaces granted consent (SSD-76913969) for the construction and operation of a large format high bay automated warehouse and distribution centre, including:

- Automatic search and retrieval systems
- Cold Storage
- Ancillary Offices
- Associated services and infrastructure
- On-site car parking
- Site access
- Landscaping.

The development was for the ALDI Automated Distribution Centre (**ADC**) which comprises a total gross floor area of 106,706m², including a 103,546 m² fully automated warehouse comprised of ambient, chilled and freezer zones, warehouse fit-out (including racking and automated search and retrieval system), an ancillary office, gatehouse, truck wash and refuelling area, 119 loading docks, five heavy and light vehicle access driveways, onsite parking for 408 vehicles and landscaping. Heights vary across the proposed warehouse from a minimum of 22.8 m, with three high bay components up to a maximum of 42m.

The development is a landmark investment by a globally recognised business in Western Sydney and specifically the Aerotropolis, an 11,200 hectare strategically planned area which supports economic investment and employment around the Western Sydney International (Nancy Bird Walton) Airport.

Proposed Modifications

This modification Application follows ongoing detailed design which has identified the need for several minor modifications, including:

- Reconciliation of GFA attributable to an increase of 2,500 sqm for the Level 1 Mezzanine (Outbound area) as a result of detailed design development. The adjustment reflects the extension of the existing Level 1 Mezzanine toward the approved building edge to accommodate additional conveyor system infrastructure required by the automation vendors. This is a technical GFA reconciliation only and does not expand the building footprint or operational capacity of the facility.
- Energy Centres 1, 2 and 3, located on the northern, eastern and southern facades, have been reconfigured and extended marginally in accordance with the developed design and layouts required by the electrical subcontractor. Screening has been added or amended at the roof of each energy centre to house solar inverters. As these areas are classified as plant, they do not constitute a change to the overall GFA of the development.
- Addition of louvres to façade location at lower levels to facilitate make-up air for smoke exhaust purposes.

The proposed modifications are detailed in the Architectural Plans prepared by SBA at Appendix A.

Engagement

Due to the extremely minor nature of the changes, engagement has been limited to that of a Scoping Letter issued to the Department of Planning, Housing and Infrastructure (DPHI) on 8 May 2026.

The following feedback was received:

In addition to ensuring the modification report is prepared according to the State significant development guidelines – preparing a modification report, please ensure the report addresses the following points:

- *Provide a clear justification for the modification*
- *Detail how the modification adheres to controls in the IPG Master Plan, particularly in relation to Gross Floor Area changes*
- *Clearly outline any technical reports and modified architectural plans that need to be updated in respect to the modification and*
- *Provide details of the visual impact of the added louvres.*

This feedback has been incorporated and responded to within this modification report and supporting documents.

Justification of the Modified Project

This modification report assesses the proposed development as proposed to be modified with regard to relevant planning instruments and policies and outlines that no updated mitigation measures are required to ensure the project does not result in unreasonable or adverse environmental effects.

The key issues for all components of the project as proposed to be modified have been assessed in detail, within **Section 6**. It has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or negligible, given the minor scale of the modifications proposed.

The project as proposed to be modified represents a positive development outcome for the site and surrounding area for the following reasons:

- The proposal is consistent with state and local strategic planning policies.
- The proposal satisfies the applicable state development controls.
- The design responds appropriately to the opportunities and constraints presented by the site.
- The proposal will not give rise to any additional environmental impacts.
- The proposal is highly suitable for the site.
- The proposal is in the public interest.

Having considered all relevant matters, the development as modified has significant merit and should be approved.

1 Introduction

1 Introduction

This Modification Report has been prepared by Urbis Ltd on behalf of ALDI Foods Pty Ltd (**the Applicant**) pursuant to section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**). The application seeks to modify Development Consent SSD-76913969 for the ALDI Automated Distribution Centre (**ADC**) 475 Badgerys Creek Road, Bradfield NSW 2556 (**the site**).

1.1 Applicant Details

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

Table 1 Applicant Details

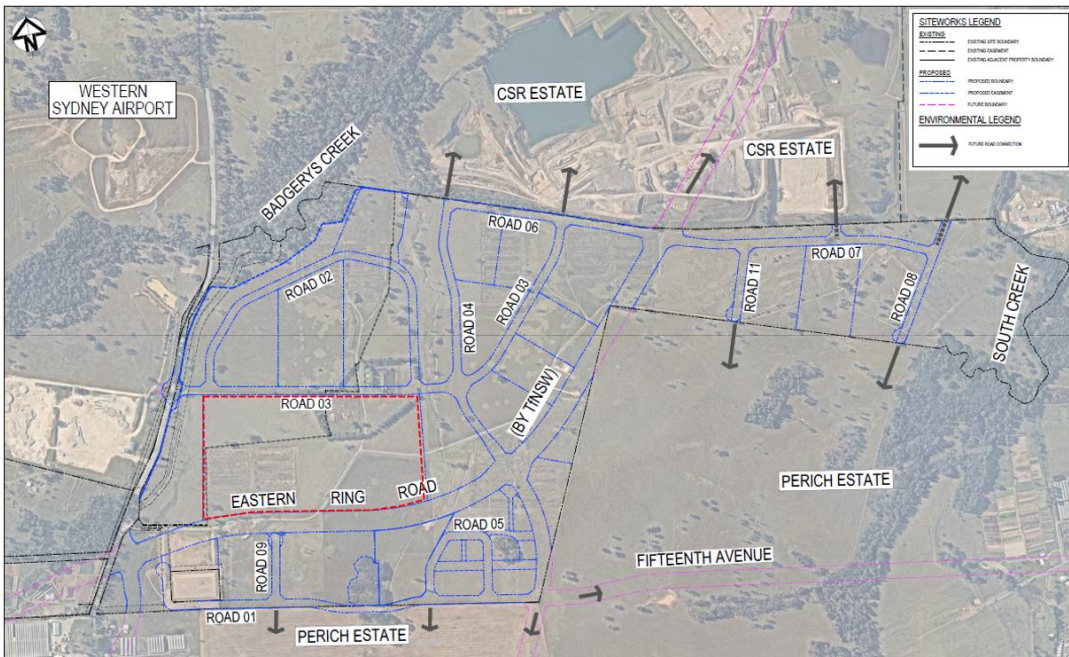
Proponent	ALDI Foods Pty Ltd
Postal Address	ALDI Foods Pty Ltd 1 Sargents Rd, Minchinbury NSW 2770
ACN	086 210 139
Nominated Contact	Trent Doran (ALDI) C/- Urbis Ltd Andrew Hobbs (Associate Director) ahobbs@urbis.com.au , (02) 8233 7697

1.2 Project Background

1.2.1 Approved Development

The proponent lodged an Environmental Impact Statement (**EIS**) with DPHI in March 2025 to SSD-76913969 (the original SSDA). The SSDA sought development consent for the construction of a warehouse or distribution centre, referred to as an Automated Distribution Centre or ADC, within the Liverpool City Council Local Government Area (**LGA**). The location of the site is illustrated in Figure 1 below.

Figure 1 Development Location within IPG Master Plan Lot Layout (Shown in Red)



Source: Urbis, 2026

The original SSDA was approved on 26th February 2026 (SSD-76913969) for the construction and operation of a large format high bay automated warehouse and distribution centre, including:

- Automatic search and retrieval systems
- Cold Storage
- Ancillary Offices
- Associated services and infrastructure
- On-site car parking
- Site access
- Landscaping.

The development comprises a total gross floor area of 106,706m², including a 103,546 m² fully automated warehouse comprised of ambient, chilled and freezer zones, warehouse fit-out (including racking and automated search and retrieval system), an ancillary office, gatehouse, truck wash and refuelling area, 119 loading docks, five heavy and light vehicle access driveways, onsite parking for 408 vehicles and landscaping. Heights vary across the proposed warehouse from a minimum of 22.8 m, with three high bay components up to a maximum of 42m.

The development is a landmark investment by a globally recognised business in Western Sydney and specifically the Aerotropolis, an 11,200 hectare strategically planned area which supports economic investment and employment around the Western Sydney International (Nancy Bird Walton) Airport.

1.3 Project Overview

Ongoing detailed design has identified the need for several minor modifications, including:

- Reconciliation of GFA attributable to an increase of 2,500 sqm for the Level 1 Mezzanine (Outbound area) as a result of detailed design development. The adjustment reflects the extension of the existing Level 1 Mezzanine toward the approved building edge to accommodate additional conveyor system infrastructure required by the automation vendors. This is a technical GFA reconciliation only and does not expand the building footprint or operational capacity of the facility.
- Energy Centres 1, 2 and 3, located on the northern, eastern and southern facades, have been reconfigured and extended marginally in accordance with the developed design and layouts required by the electrical subcontractor. Screening has been added or amended at the roof of each energy centre to house solar inverters. As these areas are classified as plant, they do not constitute a change to the overall GFA of the development.
- Addition of louvres to façade location at lower levels to facilitate make-up air for smoke exhaust purposes.

These changes are further described in Section 3 of this report.

2 Strategic Context

2 Strategic Context

This section describes the way in which the modified proposal addresses the strategic planning policies relevant to the site. Noting the extremely minor nature of the changes, limited changes to the existing strategic consistency is noted.

2.1 Project Justification

2.1.1 Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Sydney Region Plan (Region Plan) provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities – the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The site is directly adjacent to the Western Sydney International Airport (**WSI**) and the Aerotropolis Core which is identified to become the CBD of the Western Parkland City. The corridor will contribute to a strong trade, freight and logistic, advanced manufacturing, health, education and science economy.

The project will remain a catalyst for the Aerotropolis Core, delivering a significant economic investment as intended for the area under the Regional Plan.

2.1.2 Western City District Plan

The Western District Plan (**District Plan**) is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

The site forms part of the Western Economic Corridor which GSRP identifies will attract globally significant freight and logistics uses, in a highly strategic location. The project will continue to deliver this vision, enabling a large-scale warehouse or distribution facility in a strategic location.

2.1.3 Western Sydney Aerotropolis Plan

The Western Sydney Aerotropolis Plan outlines the planning framework for the Aerotropolis. It sets a clear vision to guide its future development, with objectives underpinning the realisation of the key priorities outlined within the Region and District Plans, i.e. Productivity, Sustainability, Infrastructure and Collaboration and Liveability.

Key elements of the vision and the Structure Plan include a landscape-led approach to establishing the structural elements, including:

- Implementing the 'Connecting with Country' framework to ensure Country is a key consideration during the design and development process.
- Creating a global gateway with fast and reliable transport and digital infrastructure to attract the best and brightest to invest and work in the Aerotropolis.
- Designing a cool, green new city with great places that are connected by walking, cycling, interaction and collaboration, with blue and green infrastructure to maintain biodiversity and deliver high amenity spaces.

- Evolving land uses and urban forms to allow for transition to more intensive and higher-order technology, advanced manufacturing and creative industry uses over the longer term.
- Retaining a green, biodiverse landscape with regeneration of natural landscapes to reduce impacts as the Aerotropolis develops over time.

The principles outlined above have been embedded in the IPG Master Plan and therefore remain important elements of the proposal ADC given it is being designed to comply with the Master Plan.

2.1.4 The Sydney Plan (draft December 2025)

The Draft Sydney Plan, once finalised, will replace the *Greater Sydney Region Plan – A Metropolis of Three Cities (2018)* and address strategic growth in Sydney over the next 5 to 20 years. The plan will establish priorities as well as specific policy and planning responses to the key challenges and opportunities identified for the Sydney region. This proposal, although a minor modification, will assist in meeting Response 8, which seeks to secure an ongoing pipeline of productive industrial lands.

2.2 Key Features of Site and Surrounds

2.2.1 Site Description

The site is located at 475 Badgerys Creek Road, Bradfield NSW 2556,as described below.

Table 2 Site Description

Matter	Description
Project	ALDI Automated Warehouse and Distribution Centre
Country	Dharug
Street address	475 Badgerys Creek Road, Bradfield NSW 2556
Legal description	The development is located on lots which are not yet formally registered within the address noted above.
Site area	Approximately 22.08 hectares
LGA	Liverpool City Council Local Government Area
Existing development	The site was formerly used for intensive poultry farming, operated by the current owner of the site Ingham Property Group (IPG). The site is characterised by a series of now demolished sheds and ancillary structures. There is also an internal road network within the site which had connected the sheds and ancillary structures dispersed across the site. Subsequent to approval of SSD-76913969, IPG has completed bulk earthworks for the ALDI development pad under the approved Complying Development Certificate No. CDC-25054/A, including construction of temporary sediment basins and associated erosion and sediment control measures. These works were undertaken in satisfaction of Condition A8 (Stormwater Management Infrastructure) of the SSD Instrument of Consent, which requires these control measures to be in place prior to construction commencement. Subsequent to completion of the bulk earthworks for the ALDI development pad, IPG has handed over the site to ALDI. ALDI has since obtained approval for Construction Certificate No. 1 (Reference Number: CC-26067), approved by the PCA BM+G on 15 May 2026, for early works including in-ground structure and in-ground services. Works have commenced on site under ALDI's head contractor, Richard Crookes Construction

Adjacent land uses	475 Badgerys Creek Road (the IPG Master Plan site) is situated between the Western Sydney International Airport (to the northeast), and the future Bradfield City Centre (to the south). The site is bound by a large landholding to the north owned by CSR, and a similarly large landholding to the south referred to as the GDC Site being the subject of a separate and concurrent Master Planning process. The proposed ADC site is situated within the Western Parcel of the proposed IPG Master Plan land. It will be bound to the north by Road 3 and to the south by the Eastern Ring Road, with riparian corridors to the east and west.
Topography	The site proposed for the ADC is relatively flat. More broadly, the broader parcel of land slopes down towards the creeks at the northwestern and northeastern boundaries. Earthworks are proposed as part of both the IPG Master Plan subdivision works, and under this SSDA to establish suitable levels for the building footprint.
Vehicular/Site Access	The proposed ADC footprint is reliant on the road network proposed by the IPG Master Plan. The current planning for the site proposes that the ADC will be accessed from proposed 'Road 3'.
Aboriginal Heritage	The site is identified as having areas of Aboriginal cultural sensitivity (moderate) across the periphery as identified by the Western Sydney Aerotropolis Precinct Plan mapping.
European Heritage	The site does not contain any heritage items and is not located in a heritage conservation area.
Bushfire	The broader IPG Master Plan site is currently mapped as being bushfire prone land, however the Master Plan has been designed considers the suitability of the layout with respect to bushfire risk. This has considered the Aims and Objectives of PBP, Section 2.3 Strategic Planning, and specifically addressed the requirements of Chapter 4 – Strategic Planning and Chapter 8 – Other Development. Overall, the Master Plan provides a well-considered design that has responded to the bushfire risk affecting the site and provides for the protection of life and the minimisation of impact on property, whilst having due regard to development potential, site characteristics and protection of the environment. All proposed lots are capable of meeting a minimum standard of BAL-29 construction for the indicated building envelopes on each proposed Lot, and the most suitable approach to facilitate the use of Exempt & Complying Codes should this be pursued for on-lot developments.
Biodiversity	The site is bio-certified under the Southwest Growth Centre Bio certification scheme.
Contamination	Forming part of the IPG master plan, a Detailed Site Investigation (DSI) was approved under SSD-76913969 which investigated the presence of soil and contamination. The parcel of land nominated for the ADC site previously included a farm building (now demolished) and has been subject to historic remediation works, including an emu-pick of asbestos containing material (ACM). This remediation was validated and the report concludes that the site is suitable for the proposed commercial/ industrial uses, subject to the recommendations contained within the report, including the implementation of an Asbestos Management Plan (AMP) and Unexpected Finds Protocol (UFP).

Proximity to Airport

The site is located within 3km of the Western Sydney Airport. The proposed ADC needs to satisfy obstacle limitations surfaces (OLS), noise, wind, wildlife, lighting, airspace operations and public safety considerations.

3

Description of Modifications

3 Description of modifications

This section of the report describes the proposed modifications, including the project description and relevant conditions. It includes a comparative analysis of the original development and the proposed modifications, justifying the lodgement of the application in accordance with section 4.55(1A) of the EP&A Act.

3.1 Overview

Ongoing detailed design has identified the need for several minor modifications, including:

- Reconciliation of GFA attributable to an increase of 2,500 sqm for the Level 1 Mezzanine (Outbound area) as a result of detailed design development. The adjustment reflects the extension of the existing Level 1 Mezzanine toward the approved building edge to accommodate additional conveyor system infrastructure required by the automation vendors. This is a technical GFA reconciliation only and does not expand the building footprint or operational capacity of the facility.
- Energy Centres 1, 2 and 3, located on the northern, eastern and southern facades, have been reconfigured and extended marginally in accordance with the developed design and layouts required by the electrical subcontractor. Screening has been added or amended at the roof of each energy centre to house solar inverters. As these areas are classified as plant, they do not constitute a change to the overall GFA of the development.
- Addition of louvres to façade location at lower levels to facilitate make-up air for smoke exhaust purposes.

These changes are further described below.

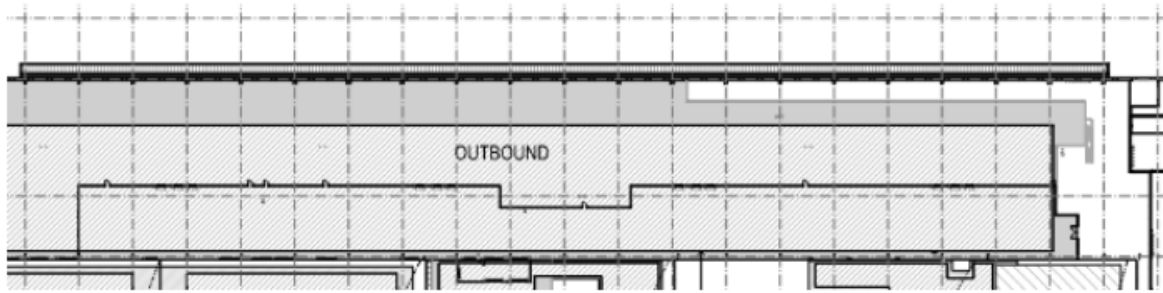
3.2 Mezzanine Level

During design development, the detailed warehouse design identified a requirement for additional conveyor systems at Level 1 outbound mezzanine, which necessitated an additional 2,500 square metres of GFA from the approved mezzanine area of 9,203sqm of GFA to 11,703sqm of GFA. This addition at level 1 outbound mezzanine comprises conveyor equipment and associated mechanical and electrical systems only (i.e. only automation equipment).

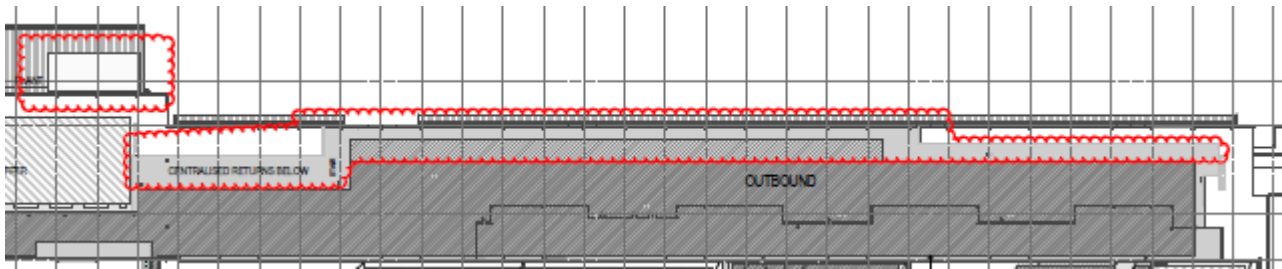
The warehouse operations, staffing levels, operational working areas, and distribution capacity remain unchanged from the approved SSDA. The additional GFA is ancillary infrastructure supporting the approved operational scope, and does not require changes to operational parameters, employee numbers, or facility capacity.

The GFA addition of 2,500 sqm is illustrated in the revised architectural drawings, refer Drawing DA-110 Mezzanine – Level 1, Rev 1, dated 29 May 2026 (**Appendix A**) lodged with DPHI under this modification. The revised architectural drawings illustrate the internal minor updates at the mezzanine levels as a result of detailed design, comprising both additions and subtractions that result in a net GFA addition of 2,500 sqm. These changes are shown in Figure 2 below.

Figure 2 Mezzanine Level



Picture 1 Approved Mezzanine



Picture 2 Amended Mezzanine (Ref: D110-Mezzanine Level 1 Rev 1)

Source: SBA Architects 2026

All mezzanine level changes are related to the internal automation systems, housing equipment, associated mechanical and electrical systems or maintenance platforms, with no impact on the approved operational parameters, staffing levels, distribution capacity, approved land use, building footprint, or building height.

These changes are a direct consequence of detailed design development and do not alter the approved scope or intent of the development.

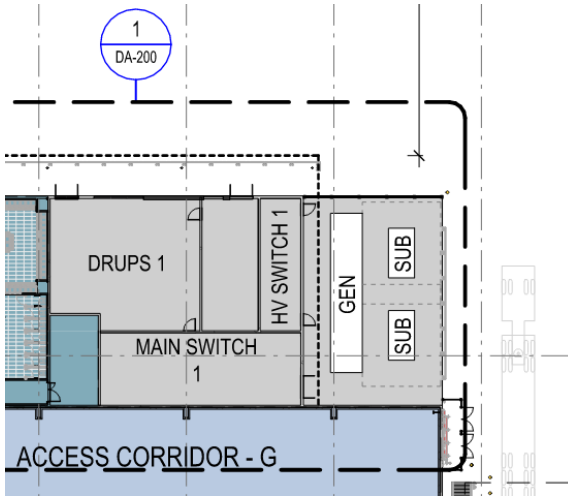
3.3 Energy Centre 1

Energy Centre 1 is proposed to be extended and reconfigured in line with the developed design, with associated amendments and relocation of screening on the elevation. Given this extension area is defined as 'plant' it does not constitute GFA.

The Energy Centre extension is longitudinal along the building facade and does not encroach upon any vehicle manoeuvring areas, loading docks, car parking, or pedestrian pathways. The extension has no bearing on the approved traffic and vehicle movement arrangements for the site and does not give rise to any additional traffic or access impacts.

Extracts of the plans associated with this extension are shown in Figure 3 below.

Figure 3 Energy Centre 1 (Changes in red cloud)

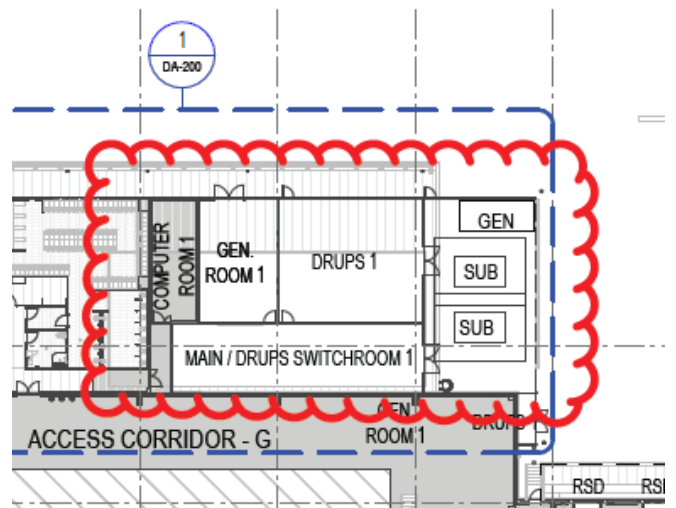


Picture 3 Approved Energy Centre 1

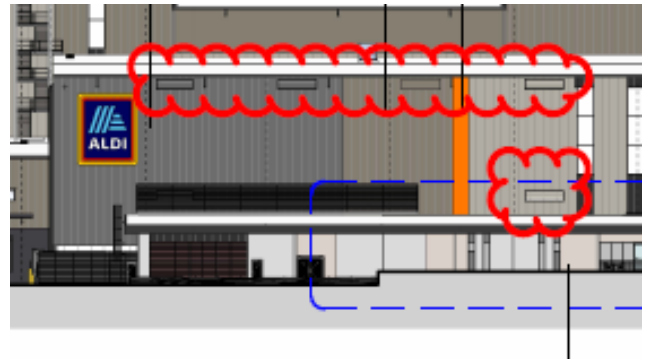


Picture 5 Approved Energy Centre 1

Source: SBA Architects 2026



Picture 4 Proposed Energy Centre 1



Picture 6 Amended Energy Centre 1

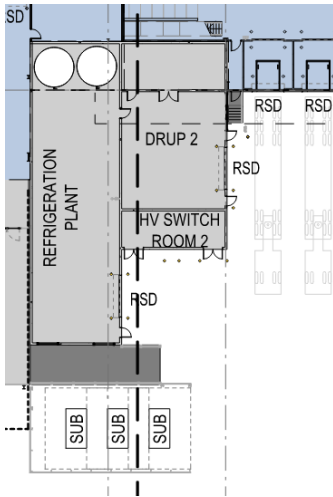
3.4 Energy Centre 2

Energy Centre 2 is proposed to be extended and reconfigured in line with the developed design. This has led to roof staircases and plant being amended on the roof plan and the roof staircase elevation. Given this extension area is defined as 'plant' it does not constitute GFA.

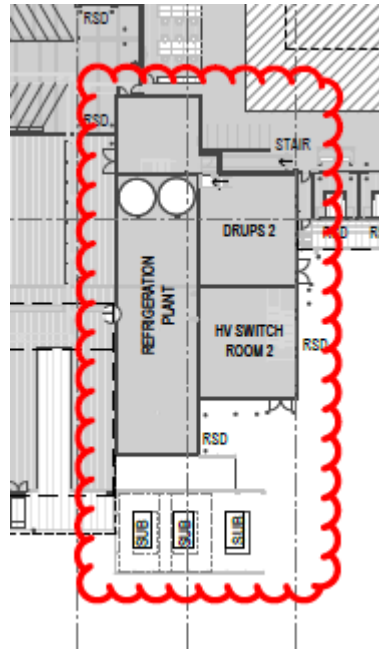
The Energy Centre extension is longitudinal along the building facade and does not encroach upon any vehicle manoeuvring areas, loading docks, car parking, or pedestrian pathways. The extension has no bearing on the approved traffic and vehicle movement arrangements for the site and does not give rise to any additional traffic or access impacts.

Extracts of the plans associated with this extension are shown in Figure 4 below.

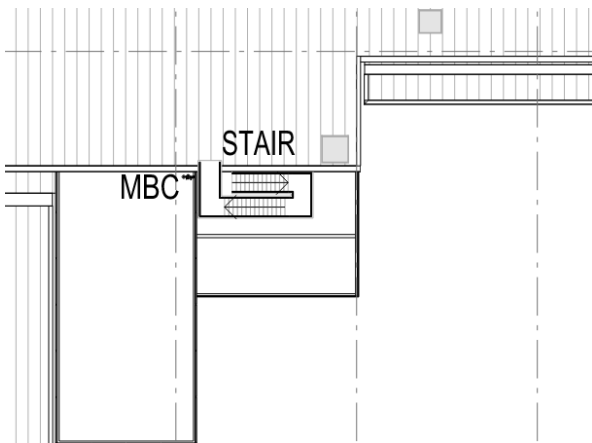
Figure 4 Energy Centre 2 (Changes in red cloud)



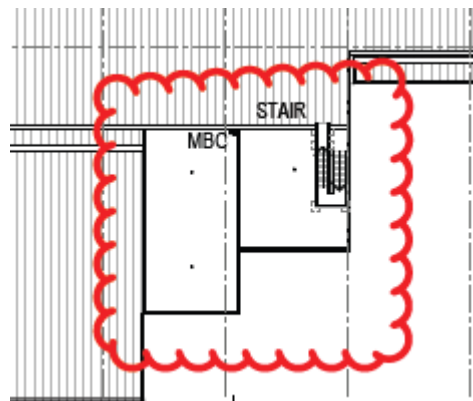
Picture 7 EC2 Approved Footprint



Picture 8 EC2 Amended Footprint



Picture 9 EC2 Approved Roof Plan



Picture 10 EC2 Amended Roof Plan



Picture 11 EC2 Approved Elevation



Picture 12 EC2 Proposed Elevation

Source: SBA Architects 2026

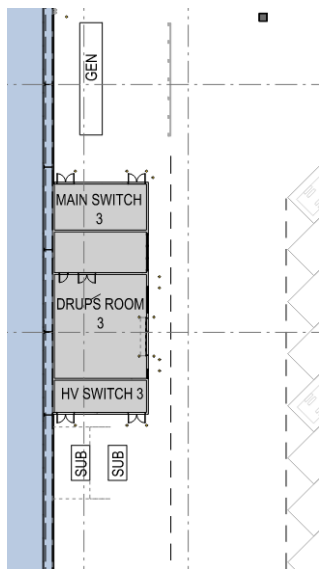
3.5 Energy Centre 3

Energy Centre 3 has been extended and reconfigured in line with the developed design, with a new roof screen added to house covered solar inverters and a staircase for roof access. Given this extension area is defined as 'plant' it does not constitute GFA.

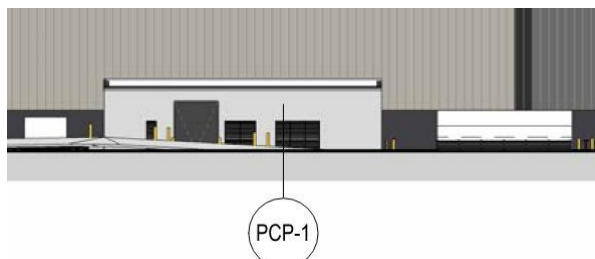
The Energy Centre extension is longitudinal along the building facade and does not encroach upon any vehicle manoeuvring areas, loading docks, car parking, or pedestrian pathways. The extension has no bearing on the approved traffic and vehicle movement arrangements for the site and does not give rise to any additional traffic or access impacts.

Extracts of the plans associated with this extension are shown in Figure 5 below.

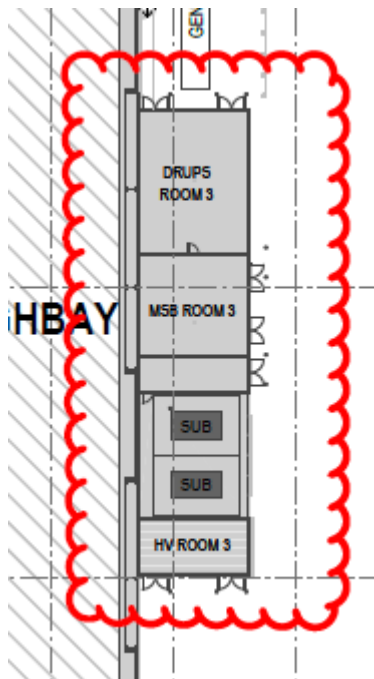
Figure 5 Energy Centre 3



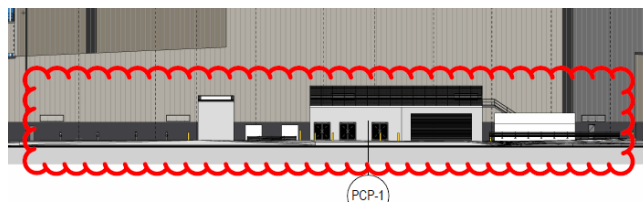
Picture 13 EC3 Approved Footprint



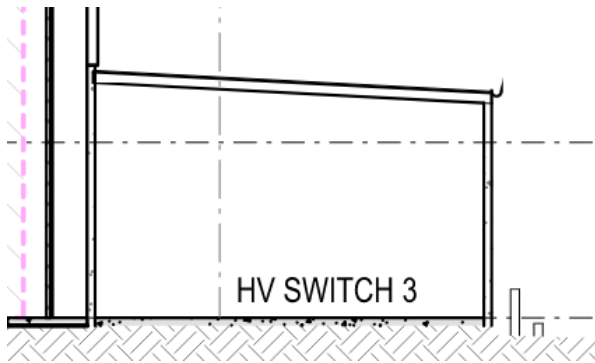
Picture 15 EC3 Approved Elevation



Picture 14 EC3 Amended Footprint

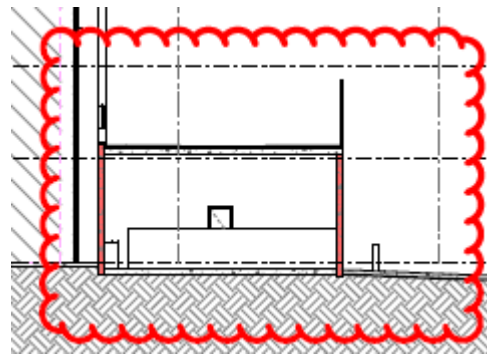


Picture 16 EC3 Amended Elevation



Picture 17 EC3 Approved Section

Source: SBA Architects 2026



Picture 18 EC3 Amended Section

3.6 Louvres

Addition of louvres to the facades walls to facilitate mechanical make-up air for smoke exhaust, incorporated as a result of the detailed design development..

Figure 6 Louvres



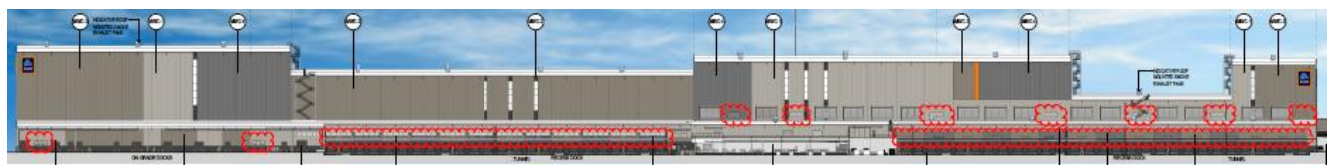
Picture 19 Approved North Elevation



Picture 20 Approved South Elevation



Picture 21 – Amended Louvres (in red clouds) – North Elevation



Picture 22 Amended Louvres (in red clouds) – South Elevation

Source: SBA Architects 2026

3.7 Summary of Changes

An update to the consolidated description of the modified project is not required, as the changes proposed do not alter the approved consolidated description which is noted as follows:

Construction and operation of a large format high-bay automated warehouse and distribution centre, including:

- automatic search and retrieval system
- cold storage
- ancillary offices
- associated services and infrastructure
- on-site car parking
- site access
- landscaping

The updated architectural drawings are provided at **Appendix A**, which include updates to the drawing references affected by the changes.

A comparative analysis has been undertaken of the proposed changes to the approved development in **Table 3** and is in accordance with the relevant criteria listed in the *DPIE State Significant Development Guidelines – preparing an environmental impact statement*.

Table 3 Comparative Task

Element	Approved Project	Modified Project
Site Area	Approximately 22.08 hectares	No change
Height of Building	Maximum 42m	No change
Gross Floor Area	106,706 sqm	109,206sqm (+2,500sqm)
Parking Spaces	408 passenger spaces	No change
Site Access	Four site access driveways will be provided to enable entry and exit of heavy vehicles. The geometry of site access driveways, internal roads and loading dock have been designed to accommodate up to a 36.5 m A-double vehicle to 'future proof' the site. The maximum vehicle size expected to access the site at the commencement of operations is a 26 m B-double.	No change
Land Use	Construction and operation of a 24/7 large-format warehouse and automated distribution centre, including fit-out, ancillary office space, loading areas, parking, landscaping and associated site facilities.	No change

Based on the above, it is considered the proposal is substantially the same development as originally granted consent, and as the proposed works do not affect the approved operation it will have no or minimal environmental impact. Accordingly, this modification is lodged under section 4.55(1A) of the EP&A Act.

3.8 Proposed Amendments to Conditions of Consent

This section outlines the proposed modification to the description of the approved development and conditions of consent included in SSD-76913969. The proposed modifications are shown by a strike through the deleted text and red text for new text.

Appendix 1 – Development Layout Plans

Architectural Plans Prepared By SBA

Drawing No	Title	Revision	Date
DA-100	Site Plan	P23 1	01.10.25 29.05.26
DA-101	Ground Floor Plan	P8 1	01.10.25 29.05.26
DA-110	Mezzanine – Level 1	P8 1	01.10.25 29.05.26
DA-111	Mezzanine – Level 2	P7	19.09.25
DA-112	Mezzanine – Level 3	P7	19.09.25
DA-113	Mezzanine – Level 4	P7	19.09.25
DA-120	Roof Plan	P10 1	10.09.25 29.05.26
DA-130	Signage Plan	P9 1	01.10.25 29.05.26
DA-140	Elevations Warehouse	P11 1	01.10.25 29.05.26
DA-150	Building Section Sheet 1	P9 1	10.09.25 29.05.26
DA-151	Building Section Sheet 2	P9 1	10.09.25 29.05.26
DA-152	Building Section Sheet 3	P9 1	10.09.25 29.05.26
DA-153	Building Section Sheet 4	P9 1	10.09.25 29.05.26
DA-200	Main Office	P8 1	01.10.25 29.05.26
DA-210	Charging & Spine Building	P9 1	01.10.25 29.05.26
DA-211	Charging & Spine Building – First Floor	P8 1	10.09.25 29.05.26
DA-212	Charging & Spine Building – Roof Plan	P8 1	10.09.25 29.05.26
DA-213	Charging & Spine Building – Elevations	P7 1	10.09.25 29.05.26
DA-214	Charging & Spine Building – Sections	P8 1	10.09.25 29.05.26
DA-220	Maintenance Sheet 1	P8	19.09.25
DA-221	Maintenance Sheet 2	P7	19.09.25
DA-300	Truck Wash	P7	19.09.25
DA-310	Gate House	P6	19.09.25

3.9 Substantially the Same Development

Based on the description of the proposed modifications above, it is considered the proposal is substantially the same development as that to which consent was originally granted, as is required by section 4.55(1A) of the Act.

The proposed modifications do not substantially change the development for which consent was originally granted under SSD-76913969 for the reasons outlined below:

- The key principles of the approved development remain unchanged from the original SSDA approval, retaining the warehouse and distribution centre building in its approved location. The development will remain consistent with the land use objectives for the 'ENT' Enterprise Zone.
- The scale of built form is substantially the same as that approved, with only a minor increase to the overall internal GFA which will be accommodated within the approved building footprint and envelope, and minor external footprint changes to accommodate the energy centre floorplate area reconfigurations
- The location of development lot, building location and accesses will remain unchanged.
- The hours of operation remain unchanged.
- In terms of a quantitative assessment the proposed development will not result in any significant changes to the numerical features of the approved development (under SSD-76913969). The minor changes to GFA will be contained within the approved building structure and the external amendments to the louvres are minor in nature. These works are not anticipated to generate additional environmental impacts for consideration, as detailed in Section 6 of this modification report.
- With regard to a qualitative assessment, the modification application demonstrates that the proposal will continue to comply with the relevant state and local planning policies and development controls, as demonstrated in the following section. The proposal will not give rise to additional environmental impacts, as detailed in Section 6 of this modification report

4 **Statutory Context**

4 Statutory Context

This section of the report provides an overview of the key statutory requirements relevant to the site and the project as proposed to be modified. It identifies the key statutory matters which are addressed in detail within **Section 6**, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

4.1 Statutory Requirements

Table 4 categorises and summarises the relevant requirements in accordance with the DPE State Significant Development Guidelines.

Table 4 Identification of Statutory Requirements for the Project

Statutory Relevance	Action	Consistency with Approved Development
Power to grant approval	The EP&A Act establishes the framework for the assessment and approval of development and activities in NSW. Part 4, Division 4.7 of the EP&A Act sets out the provisions which apply to the assessment and determination of development applications for SSD. Development in the Western Sydney Aerotropolis with an Estimated Development Cost (EDC) more than \$30M is declared to be SSD. Schedule 1 section 29 of the Planning Systems SEPP states: 29 Development in the Western Sydney Aerotropolis <i>Development on land shown on the Land Application Map under State Environmental Planning Policy (Precincts—Western Parkland City) 2021, Chapter 4 if the proposed development—</i> <i>(a) has an estimated development cost of more than \$30 million, and</i> <i>(b) does not involve development—</i> <i>(i) prohibited under the Chapter, or</i> <i>(ii) to which that Policy, section 4.13A applies.</i> The proposed development has an estimated EDC in excess of \$30M. As such the proposal is SSD. The proposal is for a 'warehouse or distribution centre' which is a land use that is permitted with consent in the ENT Enterprise zone.	The proposed modification to the approval of SSD will remain consistent with this SEPP and is appropriately characterised as SSD.
Permissibility	The site is zoned ENT Enterprise in accordance with the WPC SEPP and a warehouse or distribution centre is permissible with consent in the ENT Zone.	The proposed modification remains permissible within the ENT zone.

Other approvals

No other approvals were identified in the original SSD.

4.2 Pre-Conditions

The relevant pre-conditions to exercising the power to grant approval were outlined in the EIS for the original SSDA. The pre-conditions which are relevant to the project as modified and the section where these matters are addressed within the report are summarised in **Table 5**.

Table 5 Pre-conditions

Statutory Reference	Pre-Condition	Consistency with Approved Development
Environmental Planning and Assessment Regulation 2021		
Section 35 – Additional requirements for development applications in certain areas of Sydney	A person must not apply to a consent authority for development consent to carry out development within Western Sydney Aerotropolis under Chapter 4 of the WPC SEPP unless the application is accompanied by an assessment of the consistency of the development with the relevant plan. The proposed modifications do not alter the original assessment provided against the requirements of the Aerotropolis Plan, Precinct Plan	Yes – The proposal is assessed as remaining consistent with the Precinct Plan.
Section 66 – Contributions plans for certain areas of Sydney.	Under section 66 of the EP&A Regulations, a development must not be determined by the consent authority unless a contributions plan has been approved for the land. A contribution is not required if the applicant has entered into a planning agreement with a planning authority under Part 7 of the Act for the matters that may be the subject of a contributions plan. The land is subject to the Western Sydney Aerotropolis Special Contributions Area. A condition for the special infrastructure contribution was imposed on the development consent, along with a condition in accordance with the Liverpool s 7.12 Aerotropolis Contributions Plan. The proposed changes do not alter these conditions.	The Liverpool s7.12 Aerotropolis Contributions Plan is in force on the land. The proposed modifications do not alter the original assessment and the scheme remains compliant.
State Environmental Planning Policy (Resilience and Hazards) 2021		
Section 4.6 – Contamination and remediation to be considered in determining development application	Section 4.6 of the Resilience and Hazards SEPP requires that a consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation for the purpose for which the development is proposed to be carried out. A Detailed Site Investigation prepared by Senversa confirmed that the previous remedial works on the site can be made suitable for the proposed commercial/industrial use land use subject to the implementation of the recommendations of the report, satisfying the requirements of the Resilience and Hazards SEPP. The proposed changes do not alter the original assessment provided.	The proposed modifications do not alter the original assessment and the scheme remains compliant.

State Environmental Planning Policy (Transport and Infrastructure) 2021

Section 2.122 – Traffic-generating development

Section 2.122 and Schedule 3 of the T&I SEPP define development for a warehouse or distribution facility with a site area of more than 8,000sqm with access to any road as *traffic-generating development*. Before determining the development, the consent authority must give written notice to Transport for NSW and take into consideration any submission received within 21 days. Accordingly, it is acknowledged that TfNSW will be consulted regarding this application.

Section 2.119 outlines requirements for development on classified roads. The consent authority must be satisfied that where practical; access will be provided from a non-classified road and that the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development. Subject to finalisation of the IPG Master Plan, the site will be adjacent to the Eastern Ring Road, however, does not propose direct vehicle access. It is anticipated that the EIS will be referred to TfNSW to confirm the suitability of proposed site access from Master Plan Road 3.

The proposed changes do not alter the original Traffic Impact Assessment findings.

The proposed modifications do not alter the original assessment and the scheme remains compliant.

State Environmental Planning Policy (Sustainable Buildings) 2022

Section 3.2 Development for non-residential development

Section 3.2 requires that: *in deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following –*

- (a) the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials,*
- (b) a reduction in peak demand for electricity, including through the use of energy efficient technology,*
- (c) a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design,*
- (d) the generation and storage of renewable energy,*
- (e) the metering and monitoring of energy consumption,*
- (f) the minimisation of the consumption of potable water.*

Development consent must not be granted for non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.

The project, inclusive of the changes, still responds to the sustainable design requirements as outlined in the Sustainability Report provided with the original assessment.

The proposed modifications do not alter the original assessment and the scheme remains compliant.

Section 3.3 Other considerations for large commercial development	Section 3.3 requires that development consent must not be granted to large commercial development unless the consent authority is satisfied the development is capable of achieving the standards for energy and water use specified in Schedule 3. NABERs commitments previously provided remain unchanged.	The proposed modifications do not alter the original assessment and the scheme remains compliant.
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State Environmental Planning Policy (Precincts – Western Parkland City) 2021 – Chapter 4 Western Sydney Aerotropolis

Section 4.17 Aircraft noise	Development consent must not be granted to noise sensitive development listed in section 4.17(5) if the development is to be located on land that is an ANEF or ANEC contour of 20 or greater. The development is located within the WS Australian Noise Exposure Concept (ANEC). The ADC is not defined as a noise sensitive development in accordance with the WPC SEPP. Additionally light industrial is acceptable in less than 30 ANEF under the Australian Standard Acoustics – Aircraft noise intrusion – Building siting and construction AS2021:2015.	The proposed modifications do not alter the original assessment and the scheme remains compliant.
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Section 4.18 – Building wind shear and turbulence	Development consent must not be granted to development shown on the Lighting and Wind Shear Map or development that penetrates the 1:35 surface unless the consent authority has consulted with the Commonwealth Body. The ADC is outside the building generated windshear and turbulence assessment trigger areas on the Lighting Intensity and Wind Shear Map, therefore Section 4.18 Building wind shear and turbulence does not apply.	The proposed modifications do not alter the original assessment and the scheme remains compliant.
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Section 4.19 – Wildlife hazards	Development consent must not be granted to relevant development on land in the 13km buffer unless the consent authority: ▪ Has consulted with relevant Commonwealth body. ▪ Considered a written assessment of the wildlife that is likely to be present on the land and the risk of the wildlife to the operation of the Airport provided by the applicant, and ▪ Is satisfied that the development will mitigate the risk of wildlife to the operation of the Airport. Section 4.19 also prohibits certain land uses within the 3km wildlife buffer zone. The subject site is located within the 3km wildlife buffer zone on the Wildlife Buffer Zone Map. The Aviation Impact Assessment confirms that a Wildlife Hazard Assessment was completed for the IPG Masterplan which outlined landscaping for warehouse (food storage) and offices is a low risk within the 3km buffer zone.	The proposed modifications do not alter the original assessment and the scheme remains compliant.
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Section 4.21 – Lighting	Development consent must not be granted to development for identified development purposes and for installation and operation of external lighting in connection with construction works that is likely to be obtrusive or create light spill outside the land on which the construction works are carried out. The ADC lies within the 6 km lighting intensity radius as shown on the Lighting Intensity Windshear SEPP map. The ADC is outside the light control zones and runway boundaries. Whilst the project does not include identified development, external lighting associated with construction works may require consultation and will be the subject of a future detailed CMP post DA consent.	The proposed modifications do not alter the original assessment and the scheme remains compliant.
Section 4.22 – Airspace operations	This section applies to development on land shown on the Obstacle Limitations Surface (OLS) Map that is a controlled activity within the meaning of Part 12, Division 4 of the Airports Act 1996, requiring consultation the relevant Commonwealth body. The Aviation Impact Assessment at provided with the original SSD confirmed that the ADC is within the lateral extents of the WSI Obstacle Limitation Surfaces (OLS). The ADC is proposed at a maximum elevation of approximately 111 m AHD (building 42 m high + finished floor level 69 m AHD) would remain below the OLS inner horizontal of 125.5 m AHD. Therefore, the ADC will remain below the OLS.	The proposed modifications do not alter the original assessment and the scheme remains compliant.
Section 4.23 – Public safety	The consent authority must consider a written assessment of the risk of the development to persons provided by the applicant and is satisfied that the development within a public safety area will adequately mitigate the risks to persons on the land including by limiting the number of people or vehicles. The site is subject to the Public Safety Area Map however does not include an identified public safety area which would warrant further assessment under this section.	N/A
Section 4.24 – Flood planning	This section applies to land within the flood planning area or below the flood planning level, requiring the consent authority to be satisfied that the development demonstrates several flood related criteria. Development consent may be granted to development on land below the flood planning level only if the development does not involve earthworks that will affect flood storage capacity or flood behaviour and is not located on a floodway area or flood storage area. The Civil Engineering Report provided with the original SSDA outlined that based on the applicable Flood Maps and review of the Flood Risk and Impact Assessment completed for the IPG Badgerys Creek Road Master Plan, the proposed development for ALDI Sydney ADC is set above the adjacent 1% AEP flood level + 500mm freeboard and the flood planning level has been met.	The proposed modifications do not alter the original assessment and the scheme remains compliant.

Section 4.25 – Preservation of trees and vegetation in the Environment and Recreation Zone and Cumberland Plain	This section limits clearing of native vegetation located within environmental or recreation zones or were identified as high biodiversity value. The subject site is not located within an environmental or recreation zone and is not subject to “existing native vegetation” as shown on the High Biodiversity Values Map. No further consideration of this section is necessary.	N/A
Section 4.25A – Clearing of native vegetation	This section requires development consent to be granted for the clearing of any native vegetation shown as “existing native vegetation” on the High Biodiversity Values Map. As noted above, the subject site is not subject to existing native vegetation (as mapped) and no further consideration of this section is necessary.	N/A
Section 4.26 – Heritage conservation	European Heritage: The consent authority may before the granting of consent, require a heritage management document to be prepared that assesses the effect on the heritage significance of items in the vicinity. Aboriginal Archaeology The consent authority must consider the effect of the proposed development on the heritage significance of the place and an Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and notify the local Aboriginal communities, in writing or other appropriate manner, about the application and take into consideration a response received within 28 days after the notice is sent. The site does not contain any European heritage items and is not located in a heritage conservation area. The site is identified as having areas of Aboriginal cultural sensitivity (moderate) across the periphery as identified by the Western Sydney Aerotropolis Precinct Plan mapping. The site is considered to have no local or state heritage items and therefore the preparation of a Statement of Heritage Impact is not required for the proposed future development as outlined within the Historical Heritage Assessment provided with the original SSDA.	The proposed modifications do not alter the original assessment and the scheme remains acceptable.
Section 4.27 – Transport corridors	The consent authority must obtain concurrence from Transport for NSW for development on transport corridor land with an EDC greater than \$200,0000 and/or development that penetrates the ground to a depth of at least 2 metres below ground level (existing) on land within 25 metres (measured horizontally) of transport corridor land. The IPG Master Plan approved the relocation of the eastern ring road, requiring amendment to the WPC SEPP Transport Corridor Map. Accordingly, the subject site has direct interface with a mapped transport corridor.	The proposed modifications do not alter the original assessment. There is no penetration proposed greater than 2m which would require concurrence

	Cut and fill is proposed within 25m of the southern property boundary, which now adjoins the Eastern Ring Road transport corridor.	from TfNSW within this setback.
Section 4.28B – Aboriginal cultural guidelines	Development consent must not be granted to development on land to which this Policy applies unless the consent authority has considered Recognise Country: Draft Guidelines for development in the Aerotropolis published in October 2021 on the Department’s website. Aboriginal culture and heritage was considered and incorporated holistically in the design proposal consistent with the Guidelines.	The proposed modifications do not alter the original assessment and the scheme remains compliant.
Part 4.5 Design Excellence and Section 4.30 – Application of this Part	Part 4.5 requires design excellence and aims to ensure development in the Western Sydney Aerotropolis is consistent with the <i>Better Placed</i> policy, published by the Government Architect NSW in May 2017 and delivers the highest standard of architectural, urban and landscape design. Section 4.30 confirms that Part 4.5 does not apply to development on land to which a master plan applies if the consent authority is satisfied that the master plan adequately provides for assessment of the design quality of the development. The IPG Master Plan includes a Design Quality Strategy, which has been prepared in collaboration with the NSW Government Architect. The EIS utilised the DQS for the purpose of satisfying design excellence, which was subsequently accepted by the DPHI.	The changes proposed under this modification would be barely perceivable from both within and outside of the site. Moreover, the changes when considered on balance, do not detract from the original assessment undertaken and a further review is not considered required.
Section 4.49 – Public utility infrastructure	Development consent must not be granted to development unless the consent authority is satisfied that essential public utility infrastructure is available or will be made available when required. An Infrastructure Delivery Strategy was prepared as part of the IPG Master Plan. It identified that road, stormwater, open space, active transport and utility infrastructure will be delivered as part of the proposed stage 1 Master Plan works, which will enable the development of the ADC site. Stage 1 Master Plan works are preceding the ADC operation, and as the DPHI is aware, are subject to separate planning approvals and are not subject to this SSD.	The proposed modifications do not alter the original assessment and the scheme remains compliant.

4.3 Mandatory Considerations

Table 6 outlines the relevant mandatory considerations to exercising the power to grant approval which were considered in the original SSDA. The majority of these statutory considerations remain unchanged from the original SSD-76913969, where these matters were assessed within Appendix B.

Table 6 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in Modification Report
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act	This is unchanged from Appendix B of the original SSD-76913969
Section 4.15	Relevant environmental planning instruments - SEPP Planning Systems - SEPP Transport and Infrastructure - SEPP Resilience and Hazards - SEPP Biodiversity and Conservation - SEPP Industry and Employment - SEPP Sustainable Buildings - SEPP Precincts – Western Parkland City	The assessment against these SEPPs remain unchanged
	Relevant draft environmental planning instruments	N/A
	Relevant planning agreement or draft planning agreement	N/A
	Western Sydney Aerotropolis Development Control Plan – Phase 2	The assessment against the DCP remains unchanged
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	Section 7.5
	The suitability of the site for the development	Section 7.6
	The public interest	Section 7.7
Section 4.24	Concept Approval	N/A
Section 4.55	The proposed development is the same or substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all). The proposed development results in no or minimal environmental impact.	Section 3.9 and Section 6.2

Statutory Reference	Mandatory Consideration	Section in Modification Report
Mandatory relevant considerations under EPIs		
<i>State Environmental Planning Policy (Precincts – Western Parkland City) – Chapter 4</i>	The proposed development is permitted with consent in accordance with section 7.9(3) of the WPC SEPP.	Yes – Unchanged
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	Section 4.6 Contamination and remediation to be considered in determining development application.	Unchanged
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	Section 2.122 – Traffic-generating development. Section 2.119 – Development with frontage to a classified road.	Unchanged
<i>State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP)</i>	All signage will be required to consider the Schedule 5 criteria under the Industry & Employment SEPP. Additional signage is not proposed within this modification application.	Unchanged
Considerations under other legislation		
<i>Biodiversity Conservation Act 2016 (BC Act) – section 7.14</i>	The likely impact of the proposed development on biodiversity values as assessed in the Biodiversity Development Assessment Report (BDAR). The Minister for Planning may (but is not required to) further consider under that BC Act the likely impact of the proposed development on biodiversity values.	Unchanged
<i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i>	Chapter 2 of the EPBC Act establishes controls for assessing and regulating the environmental impact of activities (including development) where Matters of National Environmental Significance (MNES) may be affected. Under the EPBC Act, any action which has, will have, or is likely to have a significant impact on MNES is defined as a “controlled action” and requires approval from the relevant Commonwealth Minister.	Unchanged
<i>Federal Airports Act 1996</i>	An Aviation Impact Assessment was prepared and submitted within the original EIS. This assessment considers Part 12 – Protection of airspace around airports including activities that result in intrusions into prescribed airspace	Unchanged

Statutory Reference	Mandatory Consideration	Section in Modification Report
	and controlled activities that may require approval under section 182 of the Airports Act.	
<i>Rural Fires Act 1997</i>	Planning for Bushfire Protection (NSW Rural Fire Service 2018) has been considered in the design of the development. A Bushfire Assessment Report was provided with the original EIS. This proposal does not change any of the considerations, as such further assessment is not required.	Unchanged
<i>Roads Act 1993</i>	Section 138 regulates works and structures in, on or over a public road including requirements for concurrence from TfNSW. The Guide for Traffic Generating Developments has been considered as part of the Transport Assessment within the original EIS. This proposal does not change any of the considerations, as such further assessment is not required.	Unchanged
Precinct Plan		
Western Sydney Aerotropolis Precinct Plan	The Aerotropolis Precinct Plan has statutory weight under Chapter 4 of the WPC SEPP. The IPG Master Plan, resulted in several amendments to the Aerotropolis Precinct Plan. An assessment of this project against the proposed planning framework was provided with the original EIS. This proposal does not change any of the assessment considerations.	Unchanged
Development Control Plans		
Western Sydney Aerotropolis Development Control Plan	The Western Sydney Aerotropolis Development Control Plan outlines the planning, design, and environmental objectives and controls that are to guide the preparation and assessment of Development Applications (DAs). An assessment of this project against the proposed planning framework was provided with the original EIS. This proposal does not change any of the assessment considerations.	Unchanged
IGP Master Plan	The site benefits from the approved IPG Master Plan which was considered in detail within the original SSD-76913969 and which facilitated the approval of the project. This modification does not give rise to any further considerations under the Master Plan and the additional internal GFA does not give rise to any inconsistencies with the Master Plan.	Unchanged

5 Engagement

5 Engagement

Due to the extremely minor nature of the changes, engagement has been limited to that of a Scoping Letter issued to the Department of Planning, Housing and Infrastructure on 8 May 2026. The following feedback was received:

In addition to ensuring the modification report is prepared according to the State significant development guidelines – preparing a modification report, please ensure the report addresses the following points:

- *Provide a clear justification for the modification*
- *Detail how the modification adheres to controls in the IPG Master Plan, particularly in relation to Gross Floor Area changes*
- *Clearly outline any technical reports and modified architectural plans that need to be updated in respect to the modification*
- *Provide details of the visual impact of the added louvres*

This feedback has been incorporated into this modification Report and supporting documents.

6 **Assessment of Impacts**

6 Assessment of Impacts

This section provides a comprehensive summary of the updated technical studies undertaken to assess the potential impacts of the proposed modifications and the updated mitigation, minimisation and management measures recommended to avoid unacceptable impacts.

The detailed technical reports and plans prepared by specialists and appended to the modification report are individually referenced within the following sections. As a result of the minor nature of the changes proposed, no changes are required to the existing approved mitigation measures.

6.1 Minor Assessment Impacts

Table 7 summarises the matters which required a minor assessment of the proposal as modified.

Table 7 Minor Assessment Impacts

Issue	Findings	Mitigation Measures
Traffic	ASON Group reviewed the proposed modification from a traffic and transport perspective, see Appendix B. ASON Group noted that as the 2,500 sqm GFA increase relates solely to Automation Vendor equipment requirements, it does not involve changes to light or heavy vehicle numbers or staff numbers. Accordingly, the modification does not have an impact to the parking demand and remains consistent with the parking provision and first principles parking assessment of the approved development. The access driveways, circulation roadways and on-site parking were reviewed, including areas in proximity to the modified energy centres. Vehicle swept path analysis was undertaken to confirm appropriate light and heavy vehicle access, circulation and parking is maintained. On this basis, ASON Group concluded the modification is supportable from a traffic and transport perspective, remaining consistent with the approved development and within the traffic generation thresholds established under the IPG Master Plan approval.	No further mitigation measures are proposed.
Noise	Renzo Tonin has provided a Noise Statement at Appendix C. This identifies that the proposed modifications have been reviewed and found to have no impact on the outcomes of the Noise and Vibration Impact Assessment (NVIA) prepared for the approved SSD-76913969, subject to any louvres added being acoustic louvres if deemed required. Design development is expected to continue by the applicant separately, including the selection of final materials and equipment. This is to include detailed noise modelling, with a review of all noise sources (base building, internal breakout and operations) to confirm the final design will cumulatively achieve the outcomes presented in the SSDA NVIA, which includes both the base building noise emissions plus all other operational components of the Proposal. It is the responsibility of the Applicant to	No further mitigation measures are proposed

Issue	Findings	Mitigation Measures
	ensure that the final acoustic performance aligns with the parameters and outcomes set out under the endorsed NVIA prepared by RTA. Additionally, the Instrument of Consent for the endorsed SSD calls for compliance with Condition B26 (Operational Noise Limits) and completion of the Operational Noise Verification Report required under Condition B32, to ensure these outcomes are met.	
Visual	The addition of new louvres within the north and south elevations will not give rise to any adverse visual impacts. The warehouse building is situated within a location that is the subject of a master plan to accommodate new warehousing and distribution premises. It is commonplace for warehouse buildings to accommodate louvres to facilitate air flow and internal operations. Given the overall size of the ADC building, the proposed louvres will appear as a small element and have been designed to match the cladding colour, so will not give rise to any detrimental impacts upon the design quality of the scheme. In addition, SBA Architecture assessed the three proposed changes at Appendix D and confirmed no additional architectural impacts arise. The GFA reconciliation of 2,500 sqm (2.3%) is wholly internal and does not affect the building envelope, external form, operations, or staffing. The Energy Centre extensions and reconfiguration are driven by subcontractor design development, with the structures classified as plant and excluded from GFA. The addition of louvres to selected facade locations is minor in nature, incorporated as part of detailed design development to facilitate mechanical make-up air for smoke exhaust purposes. The louvres are finished to match the surrounding facade cladding colour and are integrated into the facade in a manner consistent with the approved architectural character of the building. No alteration to the approved external form or built form outcomes is created.	No further mitigation measures are proposed.

6.2 Other Environmental Impacts

In light of the limited nature of the proposed modification application, the following matters have been adequately addressed in prior studies and approvals granted to the site and will not be impacted by the proposals.

- Biodiversity Assessment
- Water and Stormwater management
- Aboriginal Cultural Heritage Assessment
- Non-Indigenous Heritage Impact

- Social Impact
- Air Quality
- Bushfire Risk
- Contamination and Site Remediation
- Hazards and Risk
- Waste Management
- ESD
- Airport Safeguarding
- Geotechnical Assessment
- Surface and Groundwater Impact Assessment
- Salinity and Acid Sulfate Soils Management
- Flood Risk; and
- Infrastructure Delivery, Management and Staging

6.3 Minimal Environmental Impact

Section 4.55(1A) of the EP&A Act requires that, an application to modify a consent under this part, demonstrate that it results in no or minimal environmental impact.

As detailed in above, the proposal has been accompanied by various consultant reports each attached in the appendix of this report that consider the impacts of the proposed modification.

It is concluded that from the above and accompanying technical reports, the proposed modification is considered to give rise to only a minimal environmental impact in accordance with 4.55(1A) of the EP&A Act. That is, the changes do not result in the intensification of known impacts, nor the creation of new impacts.

7 **Justification of Modified Project**

7 Justification of Modified Project

This section of the report provides a comprehensive evaluation of the modified proposal having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed modifications, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

7.1 Project Design

The proposal has been designed to retain the key principles of the ADC layout approved in the development consent. These principles include:

- The proposal retains consistency with the IPG Master Plan key principles such as height of buildings, building setbacks, noise, waste management, open space delivery, landscaping, and public art. Further the proposal retains its consistency with the Aerotropolis Precinct Plan, delivering a significant warehousing and industrial space within proximity to Western Sydney Airport.
- Key environmental impacts considered under the original SSD assessment remain commensurate the outcome following the proposed changes. As described above, the proposed changes do not result in the intensification of known impacts, nor the creation of new impacts.
- The proposal generally retains a consistent GFA (approximately 2.3% change across ADC), noting this increase does not alter or increase the operational capacity of the site, and retains compliance with the IPG Master Plan.

The assessment of the proposal has determined that the mitigation measures established under the original SSDA remain appropriate for the development as proposed to be modified. As per the current consent, these are required to be implemented before or during the construction or operational phases of the project to ameliorate environmental impacts.

7.2 Strategic Context

The project aligns with relevant State and local strategic planning policies, as it will further contribute to industrial floorspace to support the growth of the freight and logistics network. The site's proximity to the Western Sydney Airport, a crucial component of Sydney's freight and logistics networks, is a significant advantage.

7.3 Statutory Context

The relevant State and local environmental planning instruments are outlined in **Section 4**.

The assessment concludes that the proposals comply with the required provisions within the relevant instruments as summarised below:

- The proposals have been assessed in respect to the relevant objectives of the EP&A Act as defined in Section 1.3 of the Act.
- Consideration is given to the relevant matters for consideration as required under the BC Act. A BDAR assessment was undertaken as part of the original application, and no works are proposed that would affect the outcomes of that assessment.
- The proposal complies with all of the relevant provisions of *State Environmental Planning Policy (Precincts Western Parkland City) 2021*. The proposal is consistent with the objectives of the zoning.

- The relevant State and local environmental planning instruments are outlined in Section 4. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments.
- The proposal will not change the extent of impact assessed under the originally approved SSDA against the requirements and benchmark solutions identified in the Aerotropolis DCP.

7.4 Community Views

As set out in Section 5, there was significant engagement with neighbouring landowners during the preparation phase of the SSDA. No formal pre-lodgement engagement has been undertaken in relation to this MOD given the consistency with the approved scheme.

Public notification by DPHI will also occur during the assessment of the modification.

7.5 Likely Impacts of the Modified Proposal

The modified proposal has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** the proposed modifications address the principles of ecologically sustainable development (**ESD**) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2021 (**the Regulations**) and as outlined below:
 - Precautionary principle: The precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation. This original EIS (SSD-76913969) did not identify any serious threats of environmental damage that cannot be adequately mitigated or addressed based on current scientific standards and best practices. This modification application does not alter these conclusions. In this regard, the proposed development can be considered generally consistent with the precautionary principle.
 - Intergenerational equity: The needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations. The proposed development as modified is intended to benefit both the current and future generations by;
 - Creating new local job opportunities during both the construction and operational phases.
 - Establishing a state-of-the-art warehouse facility to uphold and enhance the industry-specific skills, knowledge, and capacity of future employees.
 - Implementing impact mitigation strategies to ensure that environmental values are not only preserved but also enhanced for future generations as a result of the development.
 - Providing a project that targets above the minimum requirements for 5 Star Green Star Buildings and 6 Star – World Leadership Green Star communities rating.
 - Conservation of biological diversity and ecological integrity: As demonstrated in the original EIS, the proposed development will not result in any significant impacts on biological and ecological integrity of surrounding land, subject to the implementation of mitigation measures. This modification application does not alter these conclusions.
 - Improved valuation, pricing and incentive mechanisms: This requires the holistic consideration of environmental resources that may be affected by the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation.

The development as modified will not have any unacceptable environmental impacts in relation to air quality, water quality or waste management. The effects of the development will be acceptable and managed accordingly by the mitigation measures adopted into the original consent, as required

- **Noise:** The proposed modifications will result in a less than 1 dB(a) change at all assessed receiver locations and no change to the highest predicted noise levels in the original Noise and Vibration Impact Assessment lodged with SSD-76913969. This will ensure continued compliance with the conditions of consent relating to noise.
- **Traffic:** Given the proposal does not change warehouse operations, staffing levels, operational working areas and distribution capacity, the proposal will have no impact upon traffic generation. Further, additional swept paths are provided which demonstrate continued appropriate arrangements for vehicle access, circulation and parking.
- **Built Environment:** The project has been designed to respond to the precinct-wide road network, proposed major infrastructure projects, key agency feedback and neighbouring landowners. This ensures that the proposal aligns with the overall Precinct Plan and as amended by the IPG Masterplan. The proposed modification remains consistent with the vision of the Aerotropolis Precinct and provides for the orderly development of future development.
- **Social:** The project will continue to have positive social impacts as it will contribute to long-term employment generation and will reinstate the industry specific skills, knowledge and capacity associated with warehouse and logistic centres within NSW.
- **Economic:** The project will continue to have significant positive economic impacts through the establishment of a warehouse and logistics facility in close proximity to the Western Sydney Airport which will result in investment and economic benefit to the Western Sydney Region and State economy.

There are no additional impacts arising from the current modification proposal which would require additional measures to mitigate, minimise or manage, beyond those originally identified in the original approval for SSD-76913969.

7.6 Suitability of the Site

The site remains highly suitable for the proposed development for the following reasons:

- The proposed warehouse land use is permissible in the Enterprise Zone. The development inclusive of the changes aligns with the zone objectives as outlined in the Precincts SEPP.
- The project remains consistent with the relevant State and Local strategic and statutory policies.
- The proposed modifications have been designed with respect to the emerging local character of the Aerotropolis Precinct, giving due consideration to the site-specific constraints and opportunities.
- The project 'sits' within a broader Master Plan site. The approved Masterplan includes a servicing strategy that demonstrates the ability to service the ADC site, noting that broader works within the IPG estate are underway.
- The detailed impact assessment conducted for the original SSD assessment demonstrates that the development could proceed without any unacceptable environmental impact, provided the relevant management/mitigation measures are implemented which will be completed at the construction certificate stage. The project as proposed to be modified remains consistent with that assessment.
- The site can manage, mitigate or avoid all known environmental constraints on the site and surrounding land including impacts to the 24/7 operation of the new WSI Airport.

7.7 Public Interest

The development as proposed to be modified is considered to be in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will provide substantial public benefits, primarily by facilitating the development of a warehouse and logistics estate directly opposite WSI Airport. This strategic positioning will provide crucial support to the operational efficiency of Airport.

Having considered all relevant matters, we conclude the development as modified is appropriate for the site and approval is recommended.

Disclaimer

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A – Updated Architectural Plans

Appendix B – Traffic Statement

Appendix C – Noise Statement

Appendix D – Architectural Statement

Appendix E – Clean Architectural Plans



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