



# WILLOWTREE PLANNING

## **ENVIRONMENTAL IMPACT STATEMENT: SUBDIVISION OF 121 WILLMINGTON ROAD, LUDDENHAM SSD-77336995**

—  
Prepared by Willowtree Planning Pty Ltd  
for **Celestino Developments Pty Limited**

**17 November 2025**

Willowtree Planning acknowledges the Cammeraygal people, the Traditional Custodians of the land where this document was prepared, and the Traditional Owners of the Land where the proposed development will be located. We pay our respects to Elders past, present and emerging.

| DOCUMENT CONTROL TABLE                      |                                                                                       |                          |                                   |
|---------------------------------------------|---------------------------------------------------------------------------------------|--------------------------|-----------------------------------|
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| Version No. 3 – REVIEW<br>September 2025    |                                                                                       |                          |                                   |
| Version No. 4 – ToA REVIEW<br>November 2025 |                                                                                       |                          |                                   |
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## EIS DECLARATION

## Declaration Form: Submission of EIS

## Project Details

|                                                                   |                                                         |
|-------------------------------------------------------------------|---------------------------------------------------------|
| Project name                                                      | Subdivision of 121 Willmington Road, Luddenham NSW 2745 |
| Application number                                                | SSD-77336995                                            |
| Address of the land on which the development is to be carried out | 121 Willmington Road, Luddenham NSW 2745                |

## Proponent Details

|                   |                                             |
|-------------------|---------------------------------------------|
| Proponent name    | Celestino Developments Pty Ltd              |
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## Prepared by

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|             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Declaration | <p>The undersigned declares that this EIS:</p> <ul style="list-style-type: none"><li>▪ has been prepared in accordance with the <i>Environmental Planning and Assessment Regulation 2021</i>;</li><li>▪ contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates;</li><li>▪ does not contain information that is false or misleading;</li><li>▪ addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project;</li><li>▪ identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments;</li><li>▪ has been prepared having regard to the Department's <i>State Significant Development Guidelines - Preparing an Environmental Impact Statement</i>;</li><li>▪ contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development;</li><li>▪ contains a consolidated description of the project in a single chapter of the EIS;</li><li>▪ contains an accurate summary of the findings of any community engagement; and</li><li>▪ contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.</li></ul> |
|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|           |                                                                                     |
|-----------|-------------------------------------------------------------------------------------|
| Signature |  |
|-----------|-------------------------------------------------------------------------------------|

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|------|-----------------|
| Date | 17 October 2025 |
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| <b>Appendix L</b>                  | Biosecurity Risk Management Plan                         | SLR                          |
| <b>Appendix M</b>                  | Bushfire Assessment                                      | Peterson Bushfire            |
| <b>Appendix N</b>                  | Civil Design Report                                      | Orion Group                  |
| <b>Appendix O</b>                  | Civil Engineering Plans                                  | Orion Group                  |
| <b>Appendix P</b>                  | Concept Plan of Subdivision                              | Orion Group                  |
| <b>Appendix Q</b>                  | Connecting With Country Framework Report                 | Yerrabingin                  |
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| <b>Appendix BB</b>                 | Groundwater and Surface Water Impact Assessment          | Eco Logical Australia        |
| <b>Appendix CC</b>                 | Groundwater Investigation                                | Geotechnique                 |
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| <b>Appendix II</b>                 | Owner's Consent                                          | Celestino                    |



**ENVIRONMENTAL IMPACT STATEMENT**

Torrens Title Subdivision  
121 Willmington Road, Luddenham

SSD-77336995

| Appendix           | Document                         | Prepared by               |
|--------------------|----------------------------------|---------------------------|
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| <b>Appendix RR</b> | Weed Eradication Management Plan | Eco Logical Australia     |
| <b>Appendix SS</b> | Wildlife Hazard Assessment       | Eco Logical Australia     |
| <b>Appendix TT</b> | Wildlife Hazard Management Plan  | Eco Logical Australia     |



## ABBREVIATIONS AND GLOSSARY OF KEY TERMS

| Acronym                    | Description                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ACHAR</b>               | Aboriginal Cultural Heritage Assessment Report                                                                                                                                                                                                                                                                                                                       |
| <b>AEP</b>                 | Annual Exceedance Probability                                                                                                                                                                                                                                                                                                                                        |
| <b>Aerotropolis</b>        | Western Sydney Aerotropolis                                                                                                                                                                                                                                                                                                                                          |
| <b>AHIMS</b>               | Aboriginal Heritage Information Management Systems                                                                                                                                                                                                                                                                                                                   |
| <b>AIA</b>                 | Arboricultural Impact Assessment                                                                                                                                                                                                                                                                                                                                     |
| <b>ANEF</b>                | Australian Noise Exposure Forecast                                                                                                                                                                                                                                                                                                                                   |
| <b>BC Act</b>              | <i>Biodiversity Conservation Act 2016</i>                                                                                                                                                                                                                                                                                                                            |
| <b>BCA</b>                 | Building Code of Australia                                                                                                                                                                                                                                                                                                                                           |
| <b>BDAR</b>                | Biodiversity Development Assessment Report                                                                                                                                                                                                                                                                                                                           |
| <b>BRMP</b>                | Biosecurity Risk Management Report                                                                                                                                                                                                                                                                                                                                   |
| <b>Council</b>             | Penrith City Council                                                                                                                                                                                                                                                                                                                                                 |
| <b>CPTED</b>               | Crime Prevention Through Environmental Design                                                                                                                                                                                                                                                                                                                        |
| <b>CEMP</b>                | Construction Environmental Management Plan                                                                                                                                                                                                                                                                                                                           |
| <b>DA</b>                  | Development Application                                                                                                                                                                                                                                                                                                                                              |
| <b>Department</b>          | Department of Planning, Housing and Infrastructure                                                                                                                                                                                                                                                                                                                   |
| <b>Development extent</b>  | Works proposed on: <ul style="list-style-type: none"> <li>Proposed Lots 1, 3 and 4 (development lots)</li> <li>Proposed Lot 2 (stormwater infrastructure lot for future acquisition by Sydney Water)</li> <li>Proposed internal road network</li> <li>Proposed Lots 7 &amp; 8</li> <li>Willmington Road reserve (proposed intersection &amp; road extent)</li> </ul> |
| <b>DCP</b>                 | <i>Western Sydney Aerotropolis Development Control Plan</i>                                                                                                                                                                                                                                                                                                          |
| <b>DP</b>                  | Deposited Plan                                                                                                                                                                                                                                                                                                                                                       |
| <b>EDC</b>                 | Estimated Development Cost                                                                                                                                                                                                                                                                                                                                           |
| <b>EIS</b>                 | Environmental Impact Statement                                                                                                                                                                                                                                                                                                                                       |
| <b>EP&amp;A Act</b>        | <i>Environmental Planning and Assessment Act 1979</i>                                                                                                                                                                                                                                                                                                                |
| <b>EP&amp;A Regulation</b> | <i>Environmental Planning and Assessment Regulation 2021</i>                                                                                                                                                                                                                                                                                                         |
| <b>EPBC Act</b>            | <i>Environment Protection and Biodiversity Conservation Act 1999</i>                                                                                                                                                                                                                                                                                                 |
| <b>EPI</b>                 | Environmental Planning Instrument                                                                                                                                                                                                                                                                                                                                    |
| <b>ESD</b>                 | Ecologically Sustainable Development                                                                                                                                                                                                                                                                                                                                 |
| <b>GANSW</b>               | Government Architect New South Wales                                                                                                                                                                                                                                                                                                                                 |
| <b>GFA</b>                 | Gross Floor Area                                                                                                                                                                                                                                                                                                                                                     |
| <b>HPS Order</b>           | Environmental Planning and Assessment (Housing and Productivity Contribution) Order 2023                                                                                                                                                                                                                                                                             |
| <b>LGA</b>                 | Local Government Area                                                                                                                                                                                                                                                                                                                                                |
| <b>MNES</b>                | Matter of National Environmental Significance                                                                                                                                                                                                                                                                                                                        |



**ENVIRONMENTAL IMPACT STATEMENT**

Torrens Title Subdivision  
121 Willmington Road, Luddenham

SSD-77336995

| Acronym                                      | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>NCC</b>                                   | National Construction Code                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Precinct Plan</b>                         | <i>Western Sydney Aerotropolis Precinct Plan</i>                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Project/Proposal/Proposed development</b> | Torrens title subdivision of 121 Willmington Road, Luddenham                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Proponent</b>                             | Celestino Developments Pty Ltd                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Project area</b>                          | The Site (121 Willmington Road, Luddenham) and Willmington Road Reserve                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>RL</b>                                    | Reduced level                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>SDRP</b>                                  | NSW State Design Review Panel                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>SEARs</b>                                 | Secretary's Environmental Assessment Requirements (SSD-77336995), dated 22 November 2024                                                                                                                                                                                                                                                                                                                                                                              |
| <b>SEPP</b>                                  | State Environmental Planning Policy                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Site</b>                                  | 121 Willmington Road, Luddenham                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>SSD</b>                                   | State Significant Development                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>SSDA</b>                                  | State Significant Development Application                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Temporary works extent</b>                | Works proposed on proposed Lot 5 and include the following: <ul style="list-style-type: none"><li>▪ Temporary works over Lots 5 and 6 (residue lots)</li><li>▪ Integrated water cycle management works, which involve temporary works for the purposes of irrigation to meet the Sydney Water requirements</li><li>▪ Bulk earthworks and stockpiling of topsoil and earthworks</li><li>▪ Temporary turning head</li><li>▪ IOP (Interim Operating Procedure)</li></ul> |
| <b>TPZ</b>                                   | Tree Protection Zone                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>VPA</b>                                   | Voluntary Planning Agreement                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Willowtree Planning</b>                   | Willowtree Planning (NSW) Pty Ltd                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>WM Act</b>                                | <i>Water Management Act 2000</i>                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>WMP</b>                                   | Waste Management Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>WSUD</b>                                  | Water Sensitive Urban Design                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Western Sydney Airport</b>                | Western Sydney International (Nancy-Bird Walton) Airport                                                                                                                                                                                                                                                                                                                                                                                                              |





## SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning), on behalf of Celestino Developments Pty Limited (the Proponent). The EIS is submitted to the New South Wales (NSW) Department of Planning, Housing and Infrastructure (DPHI), in support of an application for State Significant Development (SSD), for a Torrens title subdivision of the site into eight (8) lots and associated works at 121 Willmington Road, Luddenham NSW 2745 (the site).

The site is located within the Penrith Local Government Area (LGA) and is subject to two (2) zoning provisions pursuant to the *State Environmental Planning Policy (Precincts–Western Parkland City) 2021* (Western Parkland City SEPP), as follows

- The site is primarily zoned Agribusiness (AGB); and
- The eastern portion of the site comprises multiple allotments within the Willmington Road reserve that are zoned that are zoned Infrastructure (SP2).

The proposal satisfies the definition of SSD pursuant to:

- Schedule 1, Section 29 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), being development in the Western Sydney Aerotropolis (Aerotropolis) with an Estimated Development Cost (EDC) of more than \$30 million.

As such, this EIS must be prepared in accordance with the Secretary's Environmental Assessment Requirements (SEARs).

Under the *Environmental Planning & Assessment Act 1979* (EP&A Act), it is required that a request for SEARs must be made prior to the lodgement of any application for SSD. SEARs were requested for the proposed development (Ref: SSD-77336995) and later issued by the NSW DPHI on 22 November 2024 in the form of project-specific SEARs.

The SEARs for the proposal outline several key issues to be addressed as part of this EIS, including:

- |                                         |                                                  |
|-----------------------------------------|--------------------------------------------------|
| 1. Statutory and Strategic Context      | 13. Infrastructure Requirements                  |
| 2. Suitability of the Site              | 14. Contamination                                |
| 3. Community and Stakeholder Engagement | 15. Noise and Vibration                          |
| 4. Subdivision and Civil Design         | 16. Bush Fire                                    |
| 5. Urban Design                         | 17. Airport Safeguarding                         |
| 6. Design Quality                       | 18. Aboriginal Cultural Heritage                 |
| 7. Landscaping                          | 19. Non-Aboriginal Cultural Heritage             |
| 8. Soils                                | 20. Biodiversity                                 |
| 9. Agricultural Land                    | 21. Social                                       |
| 10. Traffic and Transport               | 22. Air Quality                                  |
| 11. Water Management                    | 23. Ecologically Sustainable Development         |
| 12. Flooding                            | 24. Planning Agreement/Development Contributions |
|                                         | 25. Waste Management                             |

The findings of this EIS identify that the proposal can be accommodated, subject to suitable management and mitigation measures, without any adverse environmental impacts beyond that considered appropriate by the relevant legislation.

Further, the proposed development would be consistent with the objectives of Western Parkland City SEPP and relevant zones. The proposal is suitable for the local context and shall not result in any



significant environmental impact. As such, it is recommended that the proposal be supported by the NSW DPHI for approval, subject to reasonable and relevant conditions.

## **SITE CONTEXT**

The site is located at 121 Willmington Road, Luddenham NSW 2745 and is legally described as Lot 1 Deposited Plan (DP) 553744, Lots 6 – 17 DP232324 and Lots 7 & 8 DP227200.

The site is an irregular-shaped corner allotment with a primary frontage to Willmington Road to the east and a secondary frontage to Park Road to the south. The site has a total area of approximately 55.65 hectares and is positioned within an established agricultural area.

## **PROJECT DESCRIPTION**

The proposed development seeks consent for Torrens title subdivision of the site into eight (8) lots and associated works at the site. The development consent sought comprises the following aspects of development:

- Bulk and detailed earthworks;
- Decommissioning of one (1) dam;
- Construction of road infrastructure;
- Integrated water cycle management works;
- Tree and vegetation removal and landscaping;
- Provision and augmentation of essential services, lead-in infrastructure, utilities and servicing;
- Works outside the property boundary pertaining to the turning bay on Willmington Road;
- Construction of a new road and intersection on Willmington Road reserve; and
- Provision of temporary works over the Residue Lots being Lot 5 and Lot 6.

## **PLANNING AND LEGISLATIVE FRAMEWORK**

All relevant Federal and State legislation, as well as Environmental Planning Instruments (EPIs), have been considered in the preparation of this EIS. The proposal is satisfactory in terms of its legislative context, on the basis that:

- The proposal is permissible in the zone;
- The objectives of the zone are satisfied;
- The range of applicable SEPPs have been considered;
- Strategic documents that apply to the locality and wider region have identified that the proposed use is consistent with the strategic context of the area; and
- The proposed development can satisfy the relevant provisions of the National Construction Code (NCC) and applicable Australian Standards.

Refer to **Section 5** of this EIS.

## **PUBLIC NOTIFICATION AND CONSULTATION**

A range of authorities have been consulted with during the preparation of this EIS. These include:

- Penrith City Council;
- Liverpool City Council;
- Transport for NSW
- Department of Climate Change, Energy, the Environment and Water, specifically the:
  - Environment and Heritage Group;
  - Water Group;
- Department of Primary Industries and Regional Development;



- Civil Aviation Safety Authority;
- Western Sydney International Airport;
- Bradfield Development Authority;
- State Emergency Service;
- Rural Fire Service;
- Fire & Rescue NSW;
- Sydney Water;
- Endeavour Energy;
- NBN & Telecommunication providers;
- Surrounding local landowners, businesses and stakeholders;
- Local and regional community and environmental groups;
- Deerubbin Local Aboriginal Land Council;
- Other utilities or community service providers.

The consultation process is detailed in **Section 6** and **Appendix C**.

## ENVIRONMENTAL IMPACT ASSESSMENT

An assessment of environmental impact has been undertaken against the relevant planning controls and policies. Additionally, a number of expert consultants have been engaged to specifically consider relevant aspects of the proposal. The environmental impact assessment has found that the proposed development generally complies with the relevant controls, and it is considered that appropriate mitigation measures can be put in place to minimise any identified risks.

The proposed development is considered acceptable in a legislative sense.

Based on the specialist studies and extensive investigations carried out for the proposed development, the following conclusions are made:

- 1. Statutory and Strategic Context** – The proposal is entirely consistent with the objects of the EP&A Act. The appropriateness of the proposed development is also demonstrated through compliance the Western Parkland City SEPP, together with all other relevant planning strategies, environmental planning instruments, adopted precinct plans, draft district plan(s) and adopted management plans in that it achieves the employment generating outcomes envisaged for the site, with minimal impact on surrounding uses, environments and the Western Sydney Airport. Reference should be made to **Section 3**, **Section 5** and **Appendix B** of this EIS.
- 2. Suitability of the Site** – As demonstrated in **Section 8.6** of this EIS and throughout the entirety of the document, the site is suitable for the proposal by virtue of the lack of undue environment impacts, its permissibility with respect to relevant planning legislation and strategic frameworks, as well as the appropriate mitigation measures proposed to manage the relationship existing site constraints and the proposed subdivision. It is also noted that development sequencing of supporting infrastructure has also been suitably considered.
- 3. Community and Stakeholder Engagement** – A detailed community and stakeholder engagement strategy was developed and undertaken in consultation with the proponent and in line with the NSW DPHI's *Undertaking Engagement Guidelines for State Significant Projects*. Reference should be made to **Section 6**, as well as the SIA and the Engagement Outcomes Report appended to this EIS (**Appendix MM** and **Appendix C**)
- 4. Subdivision and Civil Design** – Details of cut and fill volumes, existing and proposed site levels, retaining walls and road design as well other relevant civil engineering matters are provided within the Civil Design Report, the Civil Engineering Plans and the Concept Plan of Subdivision



available at **Appendix N**, **Appendix O** and **Appendix P** respectively. Reference should also be made to Section 7.1 of this EIS>

5. **Urban Design** – The Urban Design Report prepared by Urbis at **Appendix PP** is reflective of a detailed and thorough design process resulting in an optimised outcome whilst minimising amenity impacts. Of note, the urban design was developed in accordance with the Connecting with Country Framework (**Appendix Q**), highlighting the integration of Aboriginal culture and heritage within the project. See **Section 4** and **Section 7.2** of this EIS.
6. **Design Quality** – The proposed development successfully achieves design excellence in accordance with Part 4.5 of the Western Parkland City SEPP, Better Places, and the Western Sydney Aerotropolis DCP. For complete responses of the proposal against the Design Excellence Requirements and matters raised by the SDRP, please see **Section 7.3**.
7. **Landscaping** – The proposal involves the removal of 97 trees, as per the Arboricultural Impact Assessment Report available at **Appendix H**. Proposed landscaping, including the planting of 376 trees with a focus on endemic species, is detailed in the Landscape Design Report & Plans (**Appendix GG**). The landscaping incorporates endemic species and contributes to a total proposed site coverage of 26.88%. This approach supports the mitigation of the urban heat island effect and maximises opportunities for the integration of green infrastructure. Reference should be made to **Section 7.4** and **Section 7.5**.
8. **Soils** – The proposed development has been designed and will be managed so as to not result in any adverse impacts having regard to soil resources. Reference should be made to **Section 7.6** and **Appendix AA** of this EIS.
9. **Agricultural Land** – The proposed development is able to mitigate any potential impacts on surrounding agricultural operations and simultaneously minimise any biosecurity risks during construction and operation phases of the project. Refer to **Section 7.7**, **Appendix L** and **Appendix FF**.
10. **Traffic and Transport** – Sufficient access, internal road networks and traffic control measures are provided as part of the proposed development, ensuring that there would be no adverse impacts on the surrounding road network. Reference should be made to **Section 7.8** and **Appendix OO** of this EIS.
11. **Water Management** – The interim and ultimate stormwater design of the proposed development is in accordance with the DCP and Precinct Plan stormwater requirements as well as engineering best practice principles, with regional stormwater infrastructure to be delivered through a works-in-kind agreement with Sydney Water. In addition, the proposal has also considered potential impacts to surface and groundwater, with risks identified as predominantly negligible. Reference should be made to **Section 7.9** and **Appendix BB**, **Appendix CC**, **Appendix LL** and **Appendix PP** of this EIS.
12. **Flooding** – The proposed development has been designed in accordance with relevant NSW flood policies and provision found within the DCP. Investigations determined that the proposal would not result in adverse impacts having regard to flood events, behaviour and safety. Reference should be made to **Section 7.10** and **Appendix Z** of this EIS.
13. **Infrastructure Requirements** – The proposed development will require the provision and augmentation of essential services, lead-in infrastructure, utilities and servicing available to the site. Reference should be made to **Section 7.11** and **Appendix DD** of this EIS.
14. **Contamination** – The site has been determined as being suitable for the proposed development, subject to the remediation of the site in accordance with the Remediation Action



Plan (RAP). Reference should be made to **Section 7.12** and **Appendix V** and **Appendix KK** of this EIS.

- 15. Noise and Vibration** – The construction noise and vibration emissions from the proposed development have been quantified and has assessed noise at the nearest sensitive receivers. Based on the assumptions and inputs of the assessment, it has been established that during construction, the site is capable of complying with relevant Australian Standards, with impacts minimised to the greatest extent practicable. Reference should be made to **Section 7.13** and **Appendix S** of this EIS.
- 16. Bush Fire Risk** – The proposed operational access for emergency services personnel as well as the evacuation arrangements for occupants and visitors has been designed to comply with the objectives of *Planning for Bushfire Protection 2019*. Reference should be made to **Section 7.14** and **Appendix M** of this EIS.
- 17. Airport Safeguarding** – The proposal will not have an adverse impact on current or future aircraft operations at Western Sydney Airport with respect to public safety, lighting, or the designated airspace, see **Section 7.15** and **Appendix F** of this EIS. Furthermore, appropriate mitigation measures in relation to wildlife have been outlined within the Wildlife Hazard Assessment and the Wildlife Hazard Management Plan, provided in **Appendix SS** and **Appendix TT** respectively. A Lighting Certificate is also at **Appendix HH**.
- 18. Aboriginal Cultural Heritage** – The proposed development will not result in any impacts to Aboriginal Cultural Heritage. Reference should be made to **Section 7.16** and **Appendix E** of this EIS.
- 19. Non-Aboriginal Cultural Heritage** – No part of the site is included on any statutory or non-statutory heritage lists nor are any sites within the immediate vicinity. Reference should be made to **Section 7.17** and **Appendix NN** of this EIS.
- 20. Biodiversity** – The project area predominantly comprises biodiversity-certified, urban-capable land, with only minor portions identified as non-certified excluded land. Accordingly, a BDAR Waiver was sought and subsequently granted on 2 October 2025 for the excluded areas. The BDAR Waiver concludes that the proposed development is unlikely to result in any significant impacts on biodiversity values (refer to **Section 7.18** and **Appendix J**). A comprehensive Biodiversity Assessment has been undertaken to support this conclusion, supplemented by a suite of management plans. For further details, please refer to **Appendix I**, **Appendix J**, **Appendix K**, **Appendix T**, **Appendix RR** and **Appendix SS**.
- 21. Social** – There are long term, positive social and economic impacts resulting from the project, through the provision of employment and business opportunity in the immediate and broader community. It is considered on balance that the project is worthy of support with respect to social and economic impacts. Reference should be made to **Section 7.19** and **Appendix MM** of this EIS.
- 22. Air Quality** – The Air Quality Impact Assessment concludes that primary air quality concerns during construction, being fugitive dust emissions from earthworks and construction activities, can be adequately managed so that the impacts will remain to be low risk. A qualitative assessment found that the impacts of the construction at sensitive receivers is not likely not to be significant. Reference should be made to **Section 7.20** and **Appendix G** of this EIS.
- 23. Ecologically Sustainable Development** – The proposed development has been optimised to minimise energy use, water consumption, and greenhouse gas emissions, while also addressing key climate-related risks through the integration of sustainability principles across all phases of the project. This approach demonstrates alignment with the NSW Government's commitment

to achieving carbon neutrality by 2050. Further details are provided in **Section 7.21** and **Appendix W** of this EIS.

**24. Planning Agreements/Development Contributions** – The proposed development is subject to State and local development contributions. Reference should be made to **Section 7.22** of this EIS.

**25. Waste Management** – A Waste Management Plan has been provided, which considers construction and operational waste measures to be undertaken for the proposed development. Reference should be made to **Section 7.23** and **Appendix QQ** of this EIS.

## **JUSTIFICATION FOR THE PROPOSED DEVELOPMENT**

Thorough consideration of the environmental impacts of the proposal has been undertaken in the environmental impact assessment process and in the preparation of the EIS. In assessing the impacts of the proposed development, consideration has been given to social, economic and environmental matters. As identified in this EIS, proposed development is not considered to represent an environmental risk, or a development that might be out of context with the surrounding locality.

## **EIS FINDINGS**

The findings of this EIS demonstrate that the proposed development can proceed with consent. All assessed impacts have been examined and deemed acceptable, in relation to all the relevant legislative requirements applicable to the site. Furthermore, the proposed development aligns with the objectives of the key relevant policies including *A Metropolis of Three Cities – Greater Sydney Region Plan*, the *Western District Plan*, Western Sydney Aerotropolis Plan 2020 (WSAP), Western Sydney Aerotropolis Precinct Plan (the Precinct Plan) and Western City Parkland SEPP.

Based on the findings of this EIS, the site can successfully support the proposed development, inclusive of related development and operations, with acceptable environmental impacts. The proposed development is a logical addition to the Luddenham area.

The proposed development is deemed suitable for its intended purpose, having regard to its regional and local context and would not result in any significant environmental impacts. As such, it is requested that the proposed development be approved, subject to reasonable and relevant conditions.

Based on the findings of this EIS, it is concluded that the proposed development would support the continued and targeted growth of Luddenham and the wider Aerotropolis. The proposal would contribute to the retention and growth of industrial land in the wider Penrith area. The proposed development is therefore considered suitable from both a local and regional context and is considered orderly and appropriate, based on social, cultural, economic and environmental matters.

Given the above reasons and the satisfaction of both of the objectives of the EP&A Act and the aims of Western Parkland City SEPP 3, it is recommended that the proposed development be supported subject to relevant and reasonable conditions.



1. INTRODUCTION

This EIS has been prepared on behalf of the Proponent, Celestino Developments Pty Limited, in support of a proposed development at 121 Willmington Road, Luddenham. The proposal involves Torrens title subdivision of the site into eight (8) lots and associated works.

The proposed development is SSD pursuant to Schedule 1, Section 29 of the Planning Systems SEPP, as it is development in the Aerotropolis with an EDC of more than \$30 million. In accordance with Section 4.39 of the EP&A Act, the Secretary of the Department issued Project-Specific SEARs for the proposed subdivision on 22 November 2024.

The purpose of this EIS is to inform the community and stakeholders about the proposed development, including its social, economic, and environmental impacts, benefits, and mitigation measures, as well as to provide a cohesive environmental assessment for the proposal.

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, Part 8 of the EP&A Regulation, and the SEARs issued for the preparation of the EIS. The EIS has also been prepared in accordance with the Department's guidelines for SSD applications lodged under Part 4 of the EP&A Act, the State Significant Development Guidelines: Preparing an Environmental Impact Statement, **Appendix B** (July 2022).

This EIS is based on the Urban Design and Landscape Design Reports prepared by Urbis and Habit8 (**Appendix PP** and **Appendix GG**) together with the Connection to Country and Civil Engineering Plans (**Appendix O** and **Appendix Q**) as fundamental documents. The EIS should also be read in conjunction with other supporting technical documentation appended to the EIS.

1.1 The Proponent

Celestino is an Australian owned family business based in Western Sydney and focused on delivering master planned residential developments, as well as commercial, and industrial projects.

The Proponent's details for the proposed development are listed in **Table 1** below.

| Table 1: Proponent Details |                                                                                  |
|----------------------------|----------------------------------------------------------------------------------|
| Name                       | Celestino Developments Pty Ltd                                                   |
| ABN                        | 70 603 180 712                                                                   |
| Address                    | 642 Great Western Highway<br>Pendle Hill NSW 2145                                |
| Nominated Contact          | Jude Adikari, Development Director                                               |
| Contact Details            | <a href="mailto:jude.adikari@celestino.net.au">jude.adikari@celestino.net.au</a> |

1.2 Overview of the Site and Regional Setting

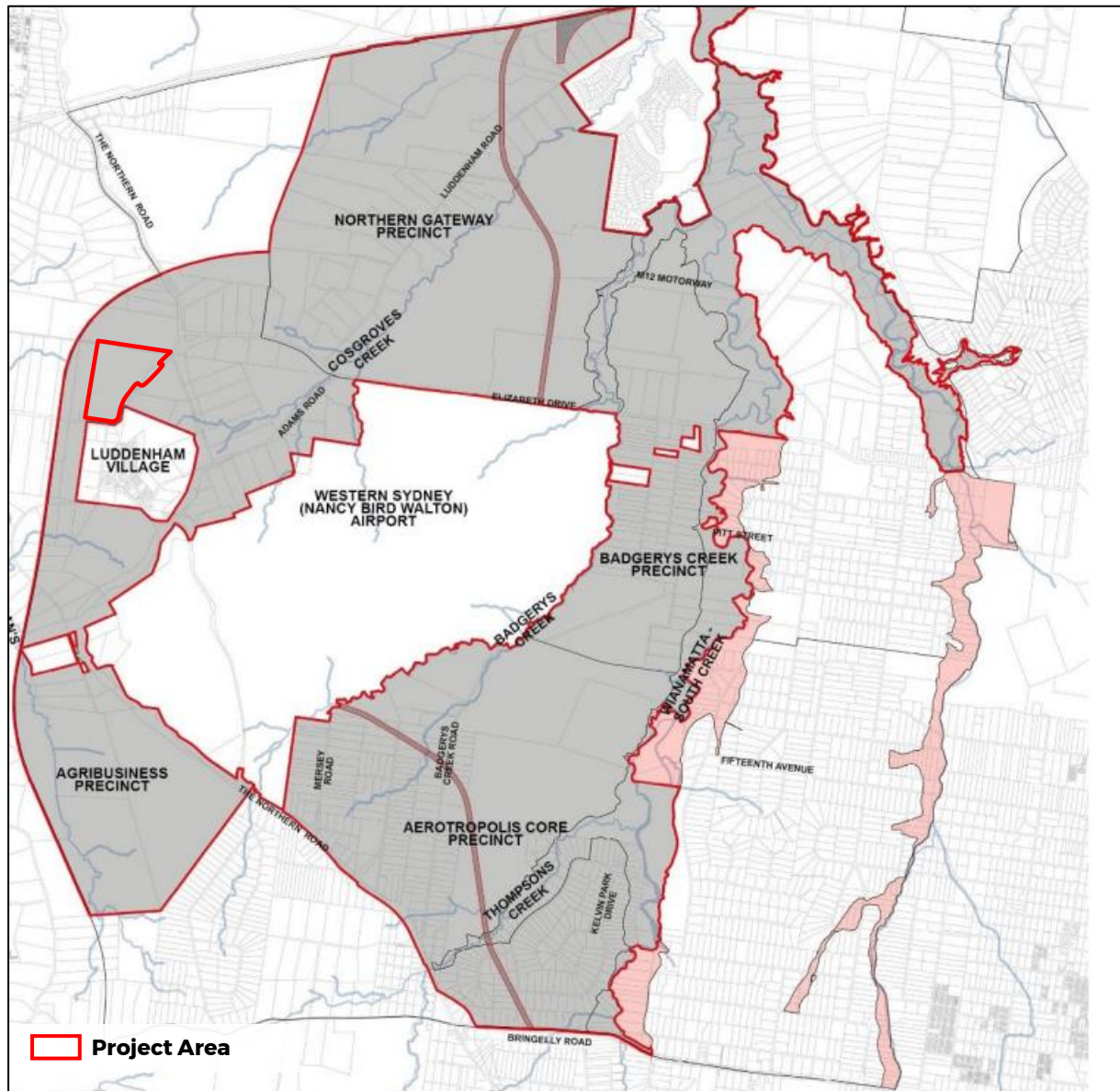
The site is located in the suburb of Luddenham, in the Penrith LGA within the Aerotropolis in the Agribusiness precinct. Specifically, the site is located approximately 2.5km west of the Western Sydney Airport that is currently under construction. The Aerotropolis is a new priority growth precinct designed to leverage the Western Sydney Airport. The Agribusiness precinct is envisioned as a precinct that offers key access points to the airport, allowing the development of agribusiness uses including integrated logistics, air freight, integrated intensive production, food innovation, fresh products, and value-added food pharmaceuticals.

The site is an irregular-shaped corner lot with dual street frontages to Willmington Road (east) and Park Road (south) and comprises multiple allotments. The proposed development includes works on the



road outside the property boundary to demolish and decommission the existing turning bay on Willmington Road, as well as intersection works on Willmington Road. The proposed development covers over a total area of 55.65 hectares, including works within the property boundary and the roadworks and this area is herein referred to as the 'project area'.

A map of the site in its regional setting is provided in **Figure 1**.



**Figure 1: Regional Site Context**

Source: Aerotropolis Precinct Plan/Willowtree Planning, 2025

### 1.3 Overview of Development

This SSDA application seeks consent for the following:

- Torrens title subdivision of the site into eight (8) lots comprising:
  - Three (3) development lots (Lots 1, 3 and 4);
  - One (1) lot containing the stormwater infrastructure for future acquisition by Sydney Water (Lot 2);
  - Two (2) residue lots (Lot 5 and 6);



- Two (2) lots within the Willmington Road reserve to facilitate the future road closure and land acquisition;
- Bulk and detailed earthworks, including cut and fill, benching, battering and any required ground dewatering to create three (3) developable lots; stockpiling of topsoil and earthworks on Lot 5;
- Decommissioning of one (1) dam located at the northwestern corner of the site to facilitate installation of stormwater infrastructure, and dewatering and subsequent backfilling of two (2) dams;
- Construction of road infrastructure (sub-arterial, collector, and park edge roads), including temporary cul-de-sacs;
- Integrated water cycle management works, including stormwater infrastructure, trunk services connections, detention basins, bioretention systems, a reuse pond and temporary irrigation areas, designed to manage both the interim and ultimate water management solutions for the site, including up to 1% AEP events;
- Tree and vegetation removal and landscaping, including the provision of street trees and footpaths;
- Provision and augmentation of essential services, lead-in infrastructure, utilities and servicing;
- Works outside the property boundary, including the demolition, remediation, and decommissioning of the turning bay on Willmington Road, and associated reinstatement works;
- Construction of a new road and intersection on Willmington Road reserve.
- Provision of Temporary works over the Residue Lots including:
  - Lots 5 and 6:
    - Integrated Water Cycle Management works, which involve temporary works for the purposes of irrigation to meet the Sydney Water requirements;
  - Lot 5:
    - Stockpiling of topsoil and earthworks;
    - Temporary turning head; and
    - Interim Operating Procedure.

It is noted that all permanent works at this stage are limited to the northern portion of the site and works on Willmington Road. Together, these areas are hereafter referred to as 'development extent'.

The proposed concept subdivision plans are included at **Appendix P** and shown in **Figure 10**. It is noted that the 'development extent' is highlighted on the concept subdivision plan in blue.

The Urban Design Report and Landscape Design Report at **Appendix PP** and **Appendix GG** comprehensively illustrate the proposed subdivision layout and demonstrate how the proposal development responds to the site's context within the Agribusiness precinct of the Western Sydney Aerotropolis.

The EDC for the proposed development is \$36,246,935 (refer to **Appendix X**).

#### 1.4 Objectives of the Development

The overall vision is to develop the site for agribusiness purposes as envisaged in the Aerotropolis Planning Framework. The key objectives of the proposed development are outlined below:

- **Country:** Start with Country, by prioritising the integration of Traditional Owners and Aboriginal designers/practitioners throughout the process, from planning to design and delivery;
- **Efficiency:** Enable subdivision of the site with the best possible environmental outcomes to create and facilitate development lots for agribusiness purposes;
- **Employment:** Develop land for its intended future agribusiness purpose, which will provide a significant increase in employment-generating activities within the Aerotropolis; and



- **Sustainability:** Incorporate sustainable practices by implementing a landscape-led approach that enhances urban tree canopy, promotes water conservation by reducing stormwater runoff, improves existing waterways, and provides functional landscaped open spaces suitable for both passive and active recreation.

## **1.5 Related Development**

### **1.5.1 Demolition and Site Remediation Works**

**DA24/0421** was approved by the Council on 10 March 2025 for the following:

*Demolition of Existing Structures and Remediation of Site.*

This DA provides consent for preliminary site preparation and remediation works prior to the determination of this SSDA and optimises the development timeline and facilitates seamless progression to subsequent construction phases across the site.





## 2. THE SITE

### 2.1 Project Area Identification

The site is identified as 121 Willmington Road, Luddenham. The site is an irregular-shaped corner allotment with a primary frontage to Willmington Road (east) and a secondary frontage to Park Road (south). The project area includes the land outside the property boundary within the existing turning bay on Willmington Road and on the Willmington Road reserve. **Table 2** below identifies the land holdings that are the subject of this SSDA:

| Table 2. Site Identification    |                      |                    |                     |
|---------------------------------|----------------------|--------------------|---------------------|
| Address                         | Legal Description(s) | Land Zoning        | Land Area (approx.) |
| 121 Willmington Road, Luddenham | Lot 1 DP553744       | Agribusiness       | 52.09 hectares      |
| N/A                             | Lot 6 – 17 DP232324  | SP2 Infrastructure | 0.54 hectares       |
| N/A                             | Lots 7 & 8 DP227200  | SP2 Infrastructure | 0.33 hectares       |
| Willmington Road                | -                    | SP2 Infrastructure | 1.89 hectares       |
| Road Reserve                    | -                    | SP2 Infrastructure | 0.80 hectares       |
| Total area: 55.65 hectares      |                      |                    |                     |

A detailed survey plan is provided at **Appendix U**. An aerial photograph of the project area is illustrated in **Figure 2**.



**Figure 2: Site Location**

Source: Nearmaps/Willowtree Planning, 2025

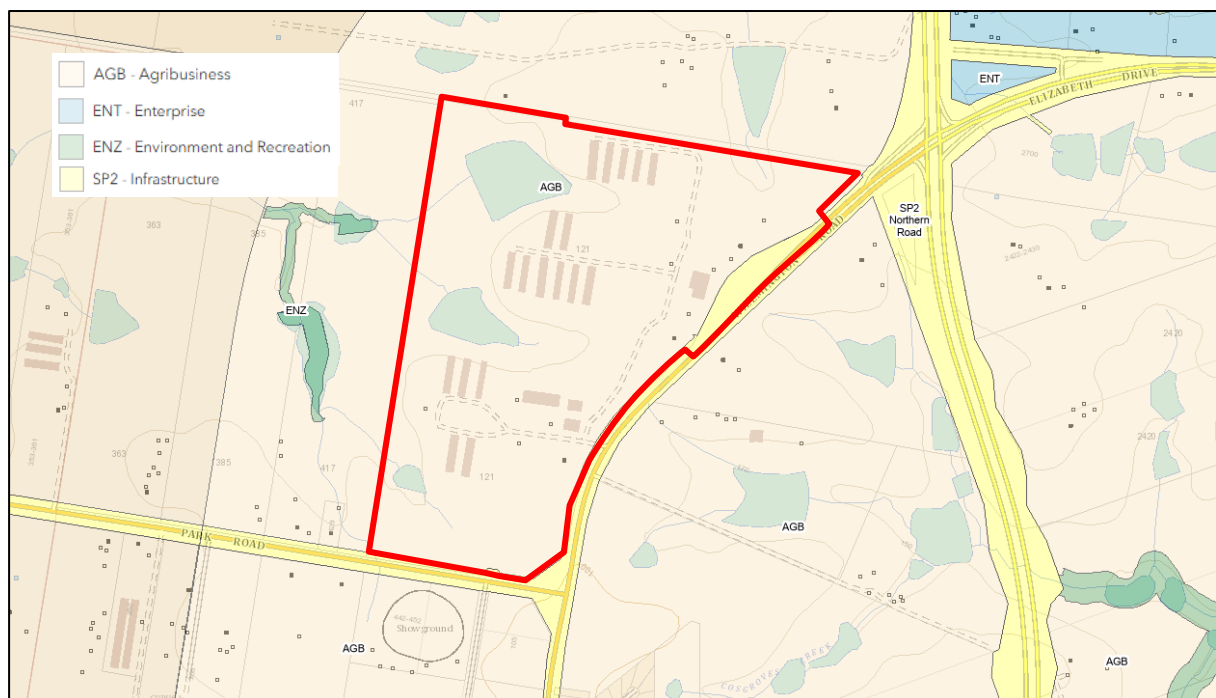


## 2.1.1 Zoning

The Western Parkland City SEPP is the principal environmental planning instrument (EPI) that applies to the site. The majority of the site is identified as AGB pursuant to clause 4.28A of the Western Parkland City SEPP, as shown in **Figure 3**. The project area is subject to two (2) zoning provisions pursuant to the Western Parkland City SEPP, as follows:

- A majority of the site is primarily zoned AGB; and
- The site comprises multiple allotments on south-eastern and southern boundaries that are zoned SP2.

The site is located in the Agribusiness Precinct and is identified as Priority Area 3 in the Aerotropolis Precinct Plan.



**Figure 3. Zoning Map**

Source: NSW Government

## 2.2 Key Features of the Site and Surrounds

### 2.2.1 Existing Development

The site is currently used for intensive livestock agriculture purposes (poultry farm). The existing improvements on the site include several poultry sheds and associated ancillary structures, such as feed silos and administration facilities. Additional ancillary development such as fences, hardstands, and signs are dispersed throughout the site. The site comprises three (3) farm dams located on the western portion of the site. Access to the site is currently from Willmington Road via two (2) entry points that connect to an internal network of gravel driveways serving the various operational areas of the poultry farm.

Photographs of the existing site conditions and existing buildings occupying the site are shown below.







**Figure 4: The Site Looking West from Willmington Road**

*Source: Orion Group, 2025*



**Figure 5: The Site Looking North from Park Road**

*Source: Orion Group, 2025*







**Figure 6: View of the Farm Dam Identified in the Precinct Plan for the Provision of Stormwater Infrastructure**

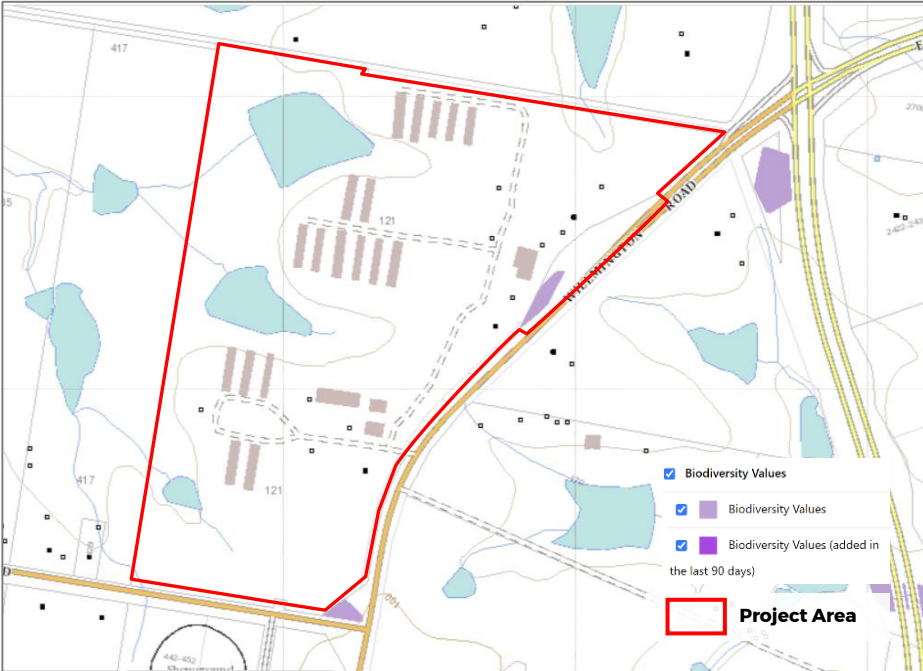
Source: Celestino, 2025

2.2.2 Environmental Features and Characteristics

**Table 3** provides an overview of the key environmental site features and characteristics within the development extent.

| Table 3: Key Environmental Features and Characteristics of the Development Extent |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Component                                                                         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Topography                                                                        | The site exhibits a gently undulating topography with grades ranging from 3% to 8%, falling predominantly towards the north and west. The terrain has been modified to accommodate existing poultry operations, including levelled platforms for agricultural sheds and associated infrastructure. Elevations at the site range from 82-94m Australian Height Datum (AHD). The eastern boundary features elevated positions that afford panoramic views towards the Blue Mountains. An existing dam is located in the western portion of the site, with an associated first-order watercourse extending from this water body. |
| Bushfire                                                                          | The site is identified as Vegetation Category 2 bushfire prone land.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Vegetation                                                                        | Existing vegetation on the site includes a mix of trees and shrubs, dispersed throughout the site with more concentrated clusters along the property boundaries and between operational areas.<br><br>The Arboricultural Impact Assessment prepared for this application ( <b>Appendix H</b> ) has identified a total of 330 trees and four (4) groups of trees within the site. The assessment does not consider trees located on adjoining land.                                                                                                                                                                            |
| Biodiversity                                                                      | The project area predominantly comprises biodiversity-certified, urban-capable land, with only minor portions identified as non-certified excluded land. Accordingly, a BDAR Waiver was sought and subsequently received for the excluded areas. The BDAR Waiver concludes that the proposed development is unlikely to result in any significant impacts on biodiversity values (refer to <b>Section 7.18</b> and <b>Appendix J</b> ). Refer to <b>Figure 7</b> below for an excerpt of the Biodiversity Values Map.                                                                                                         |

**Table 3: Key Environmental Features and Characteristics of the Development Extent**

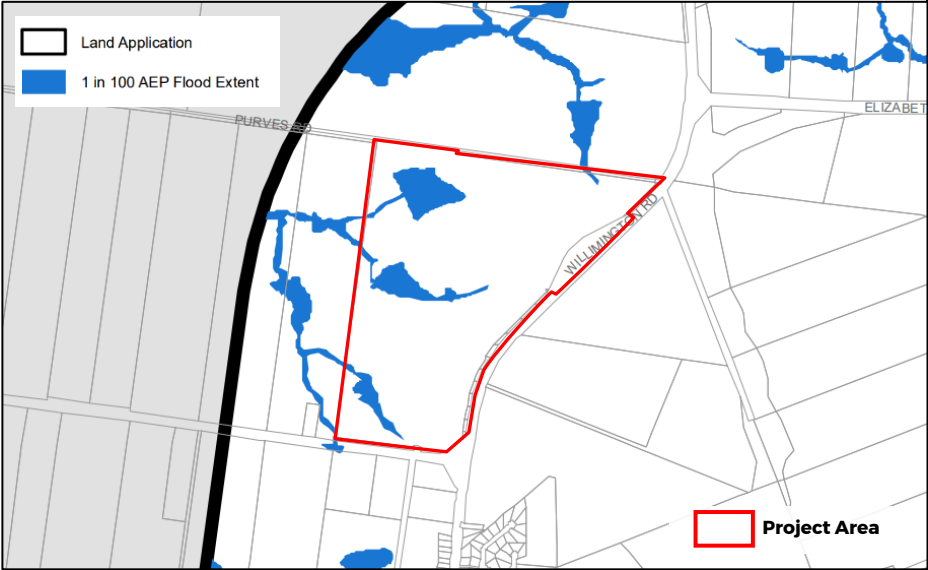
| Component          | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    |  <p><b>Figure 7: Biodiversity Values Map and Threshold Tool</b><br/>Source: NSW Government, 2025</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Archaeology</b> | <p>The Aboriginal Cultural Heritage Assessment Report at <b>Appendix E</b> identifies there are no AHIMS sites located within the project area.</p> <p>There are 10 Aboriginal archaeological sites within the project area that are of low archaeological significance. The sites consisted of isolated surface artefacts and low density subsurface archaeological deposits.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Heritage</b>    | <p>The site is not identified as a heritage item under Schedule 2 (Environmental Heritage) of the Western Parkland City SEPP. The site is not located in a heritage conservation area.</p> <p>There are four (4) listed items of local significance that are located in proximity to the southern boundary of the project area pursuant to the Western Parkland City SEPP and listed below:</p> <ul style="list-style-type: none"> <li>▪ Luddenham Showground at 428-452 Park Road (Item number I15);</li> <li>▪ Brick Cottage at 21-55 Campbell Street (Item number I6);</li> <li>▪ Weatherboard cottage at 3065-3067 The Northern Road (Item number I10); and</li> <li>▪ Weatherboard cottage at 3075 The Northern Road (Item number I11).</li> </ul> <p>The Statement of Heritage Impact at <b>Appendix NN</b> details the significance of the above listed heritage items.</p> |
| <b>Hydrology</b>   | <p>The site is situated within the South Creek Catchment, a significant tributary of the Hawkesbury River in Western Sydney. Further, the site comprises three (3) farm dams. Pursuant to the WM Act, no mapped watercourse on site met the definition of a 'river', however multiple hydro lines traverse the Site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |



**Table 3: Key Environmental Features and Characteristics of the Development Extent**

| Component                          | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Geology</b>                     | The Geotechnical Investigation at <b>Appendix AA</b> notes that the bedrock at the site is Bringelly Shale, belonging to the Wianamatta Group of rocks and comprising shale, carbonaceous claystone, laminite, fine to medium grained lithic sandstone, and rare coal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Salinity</b>                    | The Geotechnical Investigation at <b>Appendix AA</b> confirms that the site has moderate salinity potential across most areas, with higher salinity risk along the drainage lines and creek areas.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Acid Sulfate Soils</b>          | The site was not identifiable on the Acid Sulfate Soil Risk Map. The Geotechnical Investigation at <b>Appendix AA</b> indicates no acid sulfate soils are present on the site or within the surrounding area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Contamination</b>               | <p>Previous studies found parts of the site are contaminated and require remediation before it is made suitable for any future development. It is however noted that matters relating to contamination and remediation within the site have been addressed under <b>DA24/0421</b>.</p> <p>For works on the Willmington Road frontage, the DSI at <b>Appendix V</b> did not suggest the isolated areas of contamination identified could preclude the development of the site. Notwithstanding, remediation action has been recommended to ensure the site can be made suitable or any future agribusiness use. A RAP has been prepared and is available at <b>Appendix KK</b>.</p>                                                                                                                                                                                                                                                                                                                     |
| <b>Services and Infrastructure</b> | <p>The site is currently connected to the following necessary services and infrastructure, including electricity, water, telecommunications, sewer, and stormwater, as summarised below:</p> <ul style="list-style-type: none"> <li>▪ <u>Water Supply</u>: Serviced by a DN200 water main from Park Road; however, there is insufficient pressure;</li> <li>▪ <u>Wastewater</u>: The site is not currently serviced by reticulated sewer and currently uses septic tanks;</li> <li>▪ <u>Recycled Water</u>: Recycled water mains are not yet operational;</li> <li>▪ <u>Electrical Infrastructure</u>: Limited capacity via overhead network; and</li> <li>▪ <u>Telecommunications</u>: The site is currently serviced by NBN and Telstra and has a diverse range of options for telecommunication lead in conduit locations within the vicinity of the site on Willmington and Park roads.</li> </ul> <p>These services will be upgraded/augmented (as required) to service the development lots.</p> |
| <b>Stormwater and Flooding</b>     | The Flood Impact Assessment at <b>Appendix Z</b> identifies that parts of the site are identified as subject to 100 AEP Flood Extent in the Western Parkland City Flood Planning Map, as visualised in <b>Figure 8</b> below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |



| Table 3: Key Environmental Features and Characteristics of the Development Extent |                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Component                                                                         | Description                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                   | <div><div><div><div><div></div><div>Land Application</div></div><div><div></div><div>1 in 100 AEP Flood Extent</div></div></div><div><div></div><div>Project Area</div></div></div><div><div><div>Figure 8: 1% AEP Flood Impact Map</div><div>Source: NSW Government</div></div></div></div> |

2.2.3 Accessibility and Transport Infrastructure

Pedestrian and Cycling Networks  
There are no footpaths and pedestrian infrastructure along Willmington Road or Park Road in the immediate vicinity of the site, reflecting its rural setting. The nearest marked pedestrian crossing is located at the roundabout intersection of The Northern Road and Campbell Street in the Luddenham Village Centre.

Similarly, there are no on-road cycling lanes along Willmington Road and Park Road, and cyclists share the roadway with vehicular traffic. The broader regional cycling network includes a designated on-road cycling route along The Northern Road approximately 2km east of the site, forming part of the regional cycling network.

The Precinct Plan, in recognition of this, seeks to improve the pedestrian and cycling network for the Aerotropolis by upgrading existing road corridors, planned active transport links and future connectivity to regional cycling routes and open spaces.

Public Transport  
There are no public transport services within 800m of the site. That said, the site is strategically located in proximity to a number of planned public transport connections associated with the Western Sydney Airport that may enhance connectivity in the immediate future and in the long term. With respect to the site, Willmington Road will include a frequent bus corridor, and the proposed sub-arterial road network will form a part of the indicative local bus network in accordance with the transport network design found within the Precinct Plan.

Surrounding Road Network  
The site has a frontage to Willmington Road and Park Road, both of which are classified as State roads (Road number: 155; Government Gazette Number: GG38). The broader road network surrounding the site includes:

- The Northern Road approximately 2.5km east of the site, which forms a major north-south arterial connection in Western Sydney; and

- Elizabeth Drive located approximately 3km north of the site, which forms a key east-west connection between the M7, the Western Sydney Airport, and The Northern Road.

#### **2.2.4 Title Restrictions and Covenants**

The site is subject to the following encumbrances:

1. K923155: Restriction on the user (s27E(6) *Main Roads Act, 1924*) in regard to Lots 7 & 8 DP 227200. Lots 7 & 8 DP 227200 are zoned SP2 Infrastructure pursuant to the Western Parkland SEPP and located on the Park Road frontage. The extent of the land affected by this restriction is approximately 10m wide along the Park Road frontage. The Proponent's discussions with TfNSW indicate that these parcels of land are no longer required.
2. K923156: Restriction on the user (s27E(6) *Main Roads Act, 1924*) in regard to Lots 6-17 DP 232324. Lots 6-17 DP 232324 are zoned SP2 Infrastructure pursuant to the Western Parkland SEPP and located on the Willmington Road frontage on the south-eastern boundary of the site. The extent of the land affected by this restriction varies from approximately 9m – 12m wide along the Willmington Road frontage. The Proponent's discussions with TfNSW indicate that these parcels of land are no longer required given the Willmington Road (previously referred to as The Northern Road) upgrade was recently completed.

Based on discussions with TfNSW and NSW Land Registry Services, whilst the proposed road widening was officially notified under Gazette Notice, it was never formally declared as road and this process require an additional Gazette Notice or registered Dealing which has not occurred to date. Therefore, no further action or consideration is required regarding these encumbrances.

In addition to the above, the site is subject to the following easement that are required to be considered as part of the future redevelopment of the site:

3. DP1068421: An easement for water supply 1.5m wide that runs along the western boundary of the site and benefits 417 Park Road, Luddenham (Lot 1 DP1188578). No changes are proposed to this easement. Easement is proposed to be extinguished upon decommissioning of the existing operations.

### **2.3 Surrounding Development**

#### **2.3.1 Existing Development**

The existing developments adjoining and surrounding the site are described below:

- North: The northern boundary of the site interfaces with the side boundary of 2859-2901 The Northern Road, Luddenham, that is a rural land holding used predominantly for agricultural purposes. The site comprises a rural dwelling positioned toward the eastern frontage and contains several agricultural outbuildings;
- South: Luddenham Showground is located to the south of the site on the opposite side of Park Road. The site does not currently form part of the Luddenham Village boundary;
- West: To the west at 417 Park Road, Luddenham, is a large agricultural land with a rural dwelling located on the southern boundary of the site on the Park Road frontage. Minimal built structures with predominantly cleared land used for crop cultivation; and
- East: To the east, on the opposite side of Willmington Road, rural properties of 2-5 hectares in size with rural dwellings are located.

Overall, the immediate locality, apart from Luddenham Village located to the south, is predominantly characterised by a rural setting.





### 2.3.2 Future Development

The Aerotropolis is envisaged as a planned airport city using the new Western Sydney Airport as a catalyst for growth. The Aerotropolis is therefore expected to undergo transition and significant development to support the economic growth of Western Parkland City over the next decade.

The site is located within the Agribusiness precinct, one (1) of the six (6) initial land release precincts of the Aerotropolis that has established a strategic vision, general objectives, proposed land uses and a performance criterion for the development of land under the Precinct Plan. The Agribusiness precinct supports the long-term retention and growth of agribusiness in the Aerotropolis and builds high-value agricultural operations while retaining the precinct's natural landscape character.

The immediate land surrounding the site is also zoned AGB. Land further to the north-west of the site (approximately 200m) is zoned Enterprise pursuant to the Western Parkland City SEPP. The Agribusiness precinct supports the long-term retention and growth of agribusiness in the Aerotropolis and builds high-value agricultural operations while retaining the precinct's natural landscape character.

The road network in the broader precinct is subject to significant future changes associated with the Western Sydney Airport as a part of the Western Sydney Infrastructure Plan:

- The Northern Road Upgrade: Widening to a four-lane divided carriageway between Narellan and Penrith;
- Elizabeth Drive Upgrade: Major widening and realignment to support airport-related traffic;
- M12 Motorway: New east-west motorway approximately 5km north of the site, connecting the M7 Motorway with the Western Sydney Airport; and
- Outer Sydney Orbital: Future north-south corridor with potential alignment west of the site.

Similarly, the broader precinct is subject to future improvements to the transport network, including

- Potential future shared user paths along upgraded road corridors;
- Planned active transport links; and
- Future connectivity to regional cycling routes and recreational trails.

It is therefore expected that the immediate locality will undergo transition as it transforms from a rural setting to employment lands, consistent with the Aerotropolis Planning Framework.

### 2.3.3 Relevant Projects for Cumulative Impact Assessment

Having regard to the nature of the proposed development, the study area selected for the cumulative impact assessment is limited to areas within 3-5km of the project area.

**Table 4** below provides the list of relevant future projects in the surrounding context.

| Table 4: Relevant Future Projects       |              |                                                                                                                                                                                  |
|-----------------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reference                               | Site Address | Project Description and Status*                                                                                                                                                  |
| <b>Approved Infrastructure Projects</b> |              |                                                                                                                                                                                  |
| Western Sydney Airport                  | -            | Staged proposal comprising the construction and operation of a new international airport.<br><br><u>Status</u> : Under construction and expected to be operational by late 2026. |
| M12 Motorway (SSI-9364)                 | -            | The M12 project is a construction of a 16km east-west motorway that will link the M7 Motorway at Cecil Hills with                                                                |



| Table 4: Relevant Future Projects                |                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------------|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reference                                        | Site Address                               | Project Description and Status*                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                  |                                            | <p>the Western Sydney Airport, Elizabeth Drive and The Northern Road. The M12 is designed to integrate with the future Outer Sydney Orbital (OSO).</p> <p><u>Status:</u> Approved 23 April 2021. Construction of the M12 East (Elizabeth Drive Connection) started in August 2023 and is currently ongoing with several key milestones that highlight the project's advancement towards its anticipated opening in 2026, prior to the opening of the Western Sydney Airport.</p>                                                                                                                                                                                                                                                                                         |
| Elizabeth Drive West Upgrades                    | -                                          | <p>The Review of Environmental Factors was determined in November 2024. The proposed upgrades relate to 3.6km of Elizabeth Drive between The Northern Road at Luddenham, to near Badgerys Creek Road at Badgerys Creek, where it would connect with the future M12 Motorway. Elizabeth Drive will be upgraded from a two-lane rural road to a four-lane road (two (2) lanes in each direction) with provision of a central median to allow for future upgrade to six (6) lanes.</p> <p><u>Status:</u> Currently under design development and further environmental investigations are underway.</p>                                                                                                                                                                      |
| Approved Projects                                |                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Barings Luddenham Industrial Park (SSD-48438209) | 2289-2309, 2311 Elizabeth Drive, Luddenham | <p>The project was approved on 15 April 2025 for the following:</p> <p>Construction and operation of a 24/7 warehousing and distribution estate, including of:</p> <ul style="list-style-type: none"> <li>▪ Demolition, remediation, site preparation and earthworks;</li> <li>▪ Subdivision of site into four (4) lots and road reserve;</li> <li>▪ Construction of estate roads and interim intersection with Elizabeth Drive;</li> <li>▪ Café and ancillary offices;</li> <li>▪ Construction and operation of stormwater infrastructure, including basins and rehabilitation of waterway;</li> <li>▪ Estate landscaping works; and</li> <li>▪ Site servicing infrastructure, car parking and hardstand areas</li> </ul> <p><u>Status:</u> Approved 15 April 2025.</p> |
| Projects Under Assessment                        |                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Burrah Park (SSD-70316465)                       | 1953-2109 Elizabeth Drive Badgerys Creek   | <p>Concept proposal for an industrial warehouse and logistics estate with a Stage 1 development including bulk earthworks, road access and internal road construction,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |



| Table 4: Relevant Future Projects                          |                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reference                                                  | Site Address                                                     | Project Description and Status*                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                            |                                                                  | civil infrastructure and utilities, and construction and operation of three (3) warehouses<br><br><u>Status:</u> Assessment                                                                                                                                                                                                                                                                                                                                                                                                         |
| Western Sydney Airport Business Park<br><br>(SSD-64409468) | Intersection of Elizabeth Drive and The Northern Road, Luddenham | Construction and operation of the Western Sydney Airport Business Park comprising earthworks, retaining walls, estate wide infrastructure, development of nine (9) buildings for agribusiness uses, landscaping and riparian corridor works.<br><br><u>Status:</u> Response to submissions.                                                                                                                                                                                                                                         |
| DA-92/2024                                                 | 170 Willmington Road, Luddenham                                  | Concept Development Application under Part 4 Division 4.4 for the development of the site for the purpose of a logistics hub and related industrial uses within three warehouse buildings, associated car parking and landscaping. The application was refused by the Land and Environment Court on 22/08/2025.<br><br><u>Status:</u> Appeal dismissed                                                                                                                                                                              |
| DA-93/2024                                                 | 170 Willmington Road, Luddenham                                  | Development application for demolition, tree removal, subdivision of the site into five future development lots which includes a residual lot that will be subdivided in future for future acquisition by Sydney Water for stormwater infrastructure, associated subdivision works including bulk earthworks, civil works stormwater drainage and provision of services for future light industrial development. The application was refused by the Land and Environment Court on 25/08/2025<br><br><u>Status:</u> Appeal dismissed |
| Related Development to the Project                         |                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| DA24/0421                                                  | 121 Willmington Road, Luddenham                                  | This DA provides approval for the demolition of the existing structures and remediation of the site, including associated works.<br><br><u>Status:</u> DA approved on 10 March 2025. The works approved under this DA are proposed to be sequenced prior to commencement of the works that are the subject of this SSDA.                                                                                                                                                                                                            |

\* Status at the time of writing this report. While every effort has been taken to make sure the information in the table is current and accurate, the status of development applications may change and may become out of date or inaccurate.

### 2.3.4 Agreement with Other Parties

The Proponent seeks to enter into agreements with Sydney Water, Endeavor Energy and NBN to provide essential infrastructure. The details of these agreements are summarised in **Table 5** and detailed at the Infrastructure Servicing Report at **Appendix DD**.



**Table 5: Agreements with Other Parties**

| Organisation    | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Current Status |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Sydney Water    | <p>Following discussions with Sydney Water, it has been confirmed that—given the limited time between the commencement of operations and the delivery of the permanent sewer solution—an Interim Operating Procedure (IOP) for the development would be permissible, subject to further detailed design and discussions. Accordingly, Celestino is progressing interim servicing arrangements with Sydney Water to support the early stages of development, until such time as the regional infrastructure is delivered.</p> <p>For potable water, this may involve a temporary extension of the existing potable water main, with the long-term solution being a connection to regional infrastructure currently under delivery by Sydney Water. The proposed extension is trunk infrastructure that will also benefit surrounding land. Regional infrastructure, including the permanent sewer solution, is anticipated for delivery by 2027/2028.</p> | Ongoing        |
| Endeavor Energy | Endeavour Energy has confirmed that power can be supplied via the new WS-ZS which has capacity for existing commitments as well as the development. A feeder cable will be installed along Elizabeth Drive and Willmington Road, with additional infrastructure and the existing overhead networks will be placed below ground.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Ongoing        |
| NBN             | Telecommunications: Agreements with NBN will provide the necessary telecommunications infrastructure, with fibre supply assured once the first stage of the pit and pipe network is completed. Coordination with these providers six (6) months before the anticipated works will help ensure timely service delivery.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Ongoing        |



### 3. STRATEGIC PLANNING CONTEXT

This section of the EIS identifies the key issues that are relevant to the proposal's locational and strategic context and provides a justification for the proposal based on the key strategic themes and directions that are relevant to the proposed development. This section also provides an analysis of alternatives that were considered as part of the scoping process.

#### 3.1 Strategic Planning Policies

A summary of the proposal's consistency with the relevant strategic context, as established by government plans, policies, and guidelines, is presented in **Table 6** below.

| Table 6: Consistency with the Relevant Strategic Planning Policies |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                  |                                                         |                                               |              |
|--------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|---------------------------------------------------------|-----------------------------------------------|--------------|
| Strategic Plans/Policies                                           | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                  |                                                         |                                               |              |
| NSW Government Plans                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                  |                                                         |                                               |              |
| Greater Sydney Region Plan, A Metropolis of Three Cities           | <p>The Greater Sydney Region Plan (the Region Plan) provides the overarching strategic plan to manage growth and change in Greater Sydney. The site is located within Western Parkland City under the Region Plan. The vision for Western Parkland City is a polycentric city harnessing the potential of Western Sydney Airport, Aerotropolis, Liverpool, Greater Penrith and Campbelltown-Macarthur.</p> <p>The site is identified as being within the Western Economic Corridor which is earmarked for significant employment growth for Western Sydney. The site is situated to the north-west of the Western Sydney Airport and in close proximity to several infrastructure projects. The Region Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability. The following matters are relevant to the proposed development:</p> <table><tr><td>Infrastructure and Collaboration</td></tr><tr><td>Objective 3. Infrastructure adapts to meet future needs</td></tr><tr><td>Objective 4. Infrastructure use is optimised.</td></tr></table> <p>The proposal seeks to provide employment growth in a location well-served by existing and planned transport infrastructure. The site has access to existing road infrastructure, being situated in close proximity to Elizabeth Drive and The Northern Road, as well as the M12 Motorway currently under construction. Further, the site will benefit from recent announcements from the NSW and Federal Governments for the funding of several city-shaping transport infrastructure projects which will make the Aerotropolis the most connected place in Australia.</p> <p>Future agribusiness operations on the site will support the operation of the Western Sydney Airport. As such, the proposed road infrastructure works under this SSDA has been designed for the intended future use of the site for agribusiness purposes in accordance with the Precinct Plan. It will foster the growth of emerging industries envisaged as part of the future Aerotropolis vision, attracting more investment to support the Western Parkland City.</p> <table><tr><td>Productivity</td></tr></table> | Infrastructure and Collaboration | Objective 3. Infrastructure adapts to meet future needs | Objective 4. Infrastructure use is optimised. | Productivity |
| Infrastructure and Collaboration                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                  |                                                         |                                               |              |
| Objective 3. Infrastructure adapts to meet future needs            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                  |                                                         |                                               |              |
| Objective 4. Infrastructure use is optimised.                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                  |                                                         |                                               |              |
| Productivity                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                  |                                                         |                                               |              |





**Table 6: Consistency with the Relevant Strategic Planning Policies**

| Strategic Plans/Policies                       | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                | <p><i>Objective 15. The Eastern, GPOP and Western Economic Corridors are better connected and more competitive.</i></p> <p><i>Objective 20. Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City.</i></p> <p>The economic potential of the Aerotropolis will be supported by the intended future agribusiness operations on the site. The proposed development seeks to facilitate and unlock numerous construction and future operational jobs and contribute considerably to the economy.</p> <p><b>Sustainability</b></p> <p><i>Objective 30: Urban tree canopy cover is increased.</i></p> <p><i>Objective 34. Energy and water flows are captured, used and re-used.</i></p> <p><i>Objective 37. Exposure to natural and urban hazards is reduced.</i></p> <p>The proposal seeks to adopt a landscape-led approach that integrates Country values. The proposed development emphasises sustainability and resilience, including improving water quality and flows within the landscape. Further, the landscape design has made provision for the establishment of canopy trees and rest areas throughout the proposed road network to support sustainable transport choices. Additionally, the landscape design conforms with the principles of airport safeguarding against wildlife hazards as well as bushfire management to ensure the operation of a 24/7 airport.</p> |
| Our Greater Sydney 2056: Western District Plan | <p>The Western District Plan (the District Plan) applies to the site and provides a range of priorities and actions to support the strategic growth of the district.</p> <p>The site is within the Western Economic Corridor, earmarked for development of trade, freight, logistics, advanced manufacturing, health, education and science. The proposed development is consistent with the planning priorities under the Western City District Plan, in particular the following priorities:</p> <p><b>Infrastructure and collaboration</b></p> <p><i>Planning Priority W1. Planning for a city supported by infrastructure</i></p> <p><b>Productivity</b></p> <p><i>Planning Priority W8. Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis</i></p> <p><i>Planning Priority W10. Maximising freight and logistics opportunities and planning and managing industrial and urban services land.</i></p> <p><b>Sustainability</b></p> <p><i>Planning Priority W15. Increasing urban tree canopy cover and delivering Green Grid connections.</i></p> <p><i>Planning Priority W20. Adapting to the impacts of urban and natural hazards and climate change.</i></p>                                                                                                                                                                                                                  |



**Table 6: Consistency with the Relevant Strategic Planning Policies**

| Strategic Plans/Policies                                 | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                          | <p>The District Plan extends and implements the vision and objectives established in the Region Plan. The proposal's consistency with the above priorities has been elaborated under the Region Plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>Western Sydney<br/>Aerotropolis Plan 2020</p>         | <p>The WSAP establishes the strategic planning framework for the Aerotropolis and details a structure plan which outlines the high-level land uses, environmental assets and transport infrastructure. It envisions the Aerotropolis as a global gateway, underpinned by a landscape-led approach and guided by the overarching objective to Recognise Country.</p> <p>The site is located within the Agribusiness Precinct which is identified as an initial precinct under the WSAP. The WSAP underscores the Agribusiness Precinct to support high-tech agribusiness uses, including freight, logistics and horticulture.</p> <p>The proposal is consistent with the following relevant objectives of the WSAP:</p> <ul style="list-style-type: none"> <li>▪ 2.1 Achieving the vision – a landscape-led approach and 2.1.1 Starting with Country;</li> <li>▪ 2.3 Designing a cool, green new city with great places; and</li> <li>▪ 2.4 Transitioning to an Aerotropolis.</li> </ul> <p>Country and the landscape are at the forefront of the design of the proposed development. This is achieved by integrating landscape and waterways to create a cool, green parkland city. Stormwater infrastructure has been provided in the south-west quadrant of the development extent (Lot 2) for potential acquisition by Sydney Water. This infrastructure provision has been designed to include public domain spaces, artwork, trees, wetlands and shade structures. The proposed stormwater infrastructure will be a central element of the urban design and the approach to water management is part of the response to climate change and will help to cool the region.</p> <p>The proposed development is well positioned to utilise the existing and planned city shaping transport corridors in the immediate proximity of the site. The proposed road network has been designed to be consistent with the transport infrastructure in the Precinct Plan, providing good connections to the arterial road network and the wider Aerotropolis.</p> <p>The proposed subdivision will contribute to the delivery of future employment opportunities, supporting the vision for a new global gateway. The proposed development emphasises sustainability and resilience, including improving water quality and flows within the landscape and provides extensive tree planting along roads and streets to mitigate urban heat.</p> |
| <p>Western Sydney<br/>Aerotropolis Precinct<br/>Plan</p> | <p>The Precinct Plan details the vision for the Aerotropolis and sets the specific vision and objectives for each Precinct.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |



**Table 6: Consistency with the Relevant Strategic Planning Policies**

| Strategic Plans/Policies | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                          | <p>The site is located within the Agribusiness Precinct of the Precinct Plan. The north-western portion of the site is identified for the provision of stormwater infrastructure. The site is within Priority Area 3 for sequencing, and therefore the proposal is considered 'Out of Sequence' Development. This does not necessarily restrict a Proponent from developing a site, provided it is demonstrated that arrangements have been made for all essential services and infrastructure to be provided when required and at no additional cost to the government. The proposed subdivision is consistent with the Precinct Plan and seeks to enable the future development of the site for agribusiness purposes.</p> <p>An assessment of the proposed subdivision against the Precinct Plan requirements has been completed. A compliance table is available at <b>Appendix B</b> and demonstrates the proposal's alignment with the requirements and objectives of the Precinct Plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Aerotropolis Sector Plan | <p>The Aerotropolis Sector Plan (the Sector Plan) was developed in collaboration with NSW Government agencies and identifies infrastructure delivery priorities that can enable development, support job creation and maximise economic growth in the Aerotropolis.</p> <p>The Sector Plan identifies transport and water-related projects that will enable development across three-time horizons that align with development stages and new airport operations.</p> <ul style="list-style-type: none"> <li>▪ <u>By 2027</u>: serving early airport operations and initial Aerotropolis development;</li> <li>▪ <u>By 2030</u>: serving Aerotropolis growth and demand from airport operations; and</li> <li>▪ <u>Beyond 2030 (to 2040)</u>: serving the Aerotropolis and airport as they mature.</li> </ul> <p>Further, the Sector Plan identifies areas as:</p> <ul style="list-style-type: none"> <li>▪ <u>Serviced</u>: areas serviced by enabling state infrastructure. Applications can be assessed on their merits;</li> <li>▪ <u>Partly Serviced</u>: areas partly serviced by enabling state infrastructure (site-specific constraints may vary). Applications must demonstrate infrastructure capacity to service development, and applicants must consult early with TfNSW and Sydney Water. Staged development could be considered; and</li> <li>▪ <u>Unserviced</u>: areas not serviced by enabling state infrastructure (site-specific constraints may vary).</li> </ul> <p>The Agribusiness precinct within which the site is located is identified as potentially/partially serviced employment land by 2027 and recognises that the enabling infrastructure to facilitate development in the Agribusiness Precinct may include the following:</p> |



**Table 6: Consistency with the Relevant Strategic Planning Policies**

| Strategic Plans/Policies           | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | <ul style="list-style-type: none"> <li>▪ Developments may require interim, developer-led solutions for wastewater (subject to approval);</li> <li>▪ Integrated stormwater management/recycled water networks will be in place after 2028. Developers proceeding earlier can build interim solutions with approval.</li> </ul> <p>The proposed subdivision has been designed to allow for efficient servicing and infrastructure delivery and proposes interim strategies to deal with potable water and wastewater services, as detailed in the Infrastructure Servicing Report at <b>Appendix DD</b>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Luddenham Village Interim Strategy | <p>The Western Parkland City SEPP introduces a boundary for Luddenham Village and at this stage, the Precinct Plan does not apply to the Luddenham Village. The site is located immediately to the north of the Luddenham Village boundary.</p> <p>The Luddenham Village Interim Strategy (the Interim Strategy) establishes a way forward for Luddenham Village and provides a vision for a future public domain that aims to create an activated and revitalised town centre that has a local centre function in the Agribusiness Precinct.</p> <p>It is noted that the Future Plan (<b>Figure 9</b>) indicates the existing boundary of Luddenham Village is proposed to be expanded to the north and west of the village based on community feedback. The proposed village boundary extends to a portion of the site, as shown in the figure below and indicated as 'subject to future investigations.' At this stage, the site is not mapped to include additional permitted uses such as dwelling houses, dual occupancy and secondary dwellings.</p> <div data-bbox="523 1279 1396 1709"> </div> <p><b>Figure 9: Proposed Extension of the Luddenham Village Boundary</b><br/>Source: Luddenham Village Interim Strategy</p> <p>The Luddenham Village Discussion Paper was on exhibition from 8 October to 5 November 2021 for public comment. It is understood that DPHI is carrying out the steps required to investigate the sustainable future of Luddenham Village once the impact of noise from the Western Sydney Airport is better understood, and servicing is confirmed. Once the interim strategy is finalised, land use planning provisions and controls</p> |



**Table 6: Consistency with the Relevant Strategic Planning Policies**

| Strategic Plans/Policies                                 | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                          | <p>relating to Luddenham Village will be incorporated into the Precinct Plan, Phase 2 Western Sydney Aerotropolis Development Control Plan, and/or amendments to the Western Parkland City SEPP.</p> <p>The proposed development extent is located wholly outside the existing and proposed Luddenham Village boundary. On this basis, no further consideration is required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Penrith City Council Plans and Strategies</b>         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p><i>Penrith Local Strategic Planning Statement</i></p> | <p>The <i>Penrith Local Strategic Planning Statement</i> (LSPS) sets out the 2036 vision for Penrith. The site is located within the Western Sydney Aerotropolis that is a major priority within the LSPS which highlights the importance of maximising the benefits in terms of employment and economic growth as a result of the Western Sydney Airport and minimising any environmental impacts.</p> <p>The proposal supports the establishment of a future agribusiness estate in the Aerotropolis and supports the following planning priorities of the LSPS:</p> <div data-bbox="523 936 1385 1025" style="border: 1px solid black; padding: 5px;"> <p><b>Our Infrastructure</b></p> <p><i>Planning Priority 1: Align development, growth and infrastructure.</i></p> </div> <p>The proposal leverages the strategic locational advantages positioning new employment-generating activities in close proximity to existing and planned transport corridors as well as the proximity to the Western Sydney Airport for export-oriented agribusiness.</p> <div data-bbox="523 1216 1385 1339" style="border: 1px solid black; padding: 5px;"> <p><b>Our Economy</b></p> <p><i>Planning Priority 11: Support the planning of the Western Sydney Aerotropolis.</i></p> </div> <p>The proposal facilitates development consistent with the intended function of the Agribusiness Precinct, as envisaged in the Precinct Plan and leverages the economic opportunities associated with the Western Sydney Airport by creates opportunities for future businesses to participate in national and international supply chains.</p> <div data-bbox="523 1552 1385 1686" style="border: 1px solid black; padding: 5px;"> <p><b>Our Resilience</b></p> <p><i>Planning Priority 20 Manage flood risk.</i></p> <p><i>Planning Priority 21 Cool our city.</i></p> </div> <p>Flood risk management is addressed through flood modelling that incorporates climate change projections and water-sensitive urban design measures that manage stormwater flows. The proposed urban design and landscape strategy incorporates several heat mitigation and adaptation initiatives, including improving water quality and flows within the landscape and the establishment of canopy trees within the proposed road network.</p> |
| <p><i>Penrith Employment Lands Strategy 2021</i></p>     | <p>The <i>Penrith Employment Lands Strategy 2021</i> (ELS) is a city-wide strategic framework for Penrith that seeks to guide the development of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |





**Table 6: Consistency with the Relevant Strategic Planning Policies**

| Strategic Plans/Policies                                       | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                | <p>employment lands. The Agribusiness precinct is identified as a future employment precinct that will mainly cater for large floorplates, global transport, logistics, and warehousing seeking proximity to the Airport.</p> <p>The proposal demonstrates strong alignment with the strategic directions and actions of the ELS in the following ways:</p> <div data-bbox="523 499 1380 739"> <p><b>LSPS Theme: Innovate</b></p> <p><i>Strategic Direction 3: Build on our strengths and facilitate new enterprise</i></p> <p><i>Action 17: Investigating new opportunities related to the WSA associated with the Agribusiness precinct and our rural and tourism industries.</i></p> </div> <p>The proposal seeks to develop land for its intended future agribusiness purpose, which will enable employment generation for the Penrith LGA and transition land from traditional low-intensity agricultural uses to high-value agribusiness activities. The proposed subdivision patterns maintain scenic views to Blue Mountains and surrounding landscapes, ensuring that economic development harmonises with the area's natural heritage and visual character.</p> <div data-bbox="523 1021 1380 1160"> <p><b>LSPS Theme: Balanced</b></p> <p><i>Strategic Direction 4: Strengthen our resilience</i></p> <p><i>Action 19: Implementing Cooling the City and Resilient Action Plan</i></p> </div> <p>As discussed previously, the proposed urban design and landscape strategy includes several urban heat mitigation strategies including water-sensitive urban design and the establishment of canopy trees within the proposed road network.</p> |
| <b>Design Policies and Guidelines</b>                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Government Architect<br>NSW Connecting with<br>Country         | <p>The Connecting with Country Framework 2020 acts as a guide for developing connections with Country to inform the planning, design, and delivery of built environment projects in NSW.</p> <p>A Connecting with Country Framework Report (<b>Appendix Q</b>) was developed by Yerrabingin through an extensive research and engagement process. This process established meaningful opportunities for recognition, support, and respect for Indigenous cultural practices and protocols essential to the site's significance. These valuable cultural outcomes have been thoughtfully integrated into the urban design, landscape elements, and public art installations throughout the development. The Urban Design Report and Landscape Design Report at <b>Appendix PP</b> and <b>Appendix GG</b> demonstrate the consistency of the proposed development with the cultural design principles and framework established for the site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Better Placed: An<br>integrated design policy<br>for the built | <p>Better Placed is an integrated design policy that is underpinned by seven (7) objectives for good design and provides guidance on the delivery of architecture, public places, and environments in NSW.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |



**Table 6: Consistency with the Relevant Strategic Planning Policies**

| Strategic Plans/Policies       | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| environment of New South Wales | <p>The principles of Better Placed informed the design process from an urban design and landscape design perspective. The Proponent and the design team met with the State Design Review Panel (SDRP) on two (2) occasions to present the proposed development, to ensure the key priorities and objectives outlined by the Government Architect NSW were satisfied.</p> <p>The Urban Design Report at <b>Appendix PP</b> includes a detailed design response to the objectives and principles of this policy.</p> |

### 3.2 Cumulative Impacts

The site is located within the Agribusiness Precinct, which forms part of the broader Aerotropolis. The sites in the immediate vicinity are currently under assessment or being developed, including transport infrastructure projects, which reflect the overarching vision and the establishment of the Aerotropolis.

**Table 4** identifies relevant approved and likely future projects. In accordance with the Department's *Cumulative Impact Assessment Guidelines for State Significant Projects*, these projects have been considered in the potential cumulative impacts of the project addressed in **Section 7** of this EIS.

It is concluded that no cumulative impacts will create barriers to future development. It has been found that majority of the cumulative impacts identified are considered positive by virtue of the predicted benefits to way of life, accessibility, health, community and culture. Any cumulative impacts anticipated at the construction phase of the project are able to be appropriately managed and mitigated.

### 3.3 Project Agreements

The following infrastructure will be delivered in association with the proposed development:

- Provision and dedication of stormwater infrastructure on proposed Lot 2. This land will remain in private ownership until such time as Sydney Water acquires this land.

Numerous discussions have been held with Sydney Water regarding the provision and design of this infrastructure.

### 3.4 Project Justification

The proposal responds to and is aligned with several key strategic and statutory planning framework documents, including:

- Facilitating development consistent with the intended function of the Agribusiness Precinct and supports the establishment of specialised employment land activities that complement the broader Aerotropolis vision articulated in the WSAP;
- The general and precinct-specific vision and objectives for the Agribusiness precinct under the Precinct Plan;
- The aims of clause 4.1 and land use objectives of the Agribusiness zone under Chapter 4 of the Western Parkland City SEPP;
- The proposal seeks to enable economic and future employment opportunities in close proximity to existing and planned transport corridors and creates opportunities for businesses to participate in national and international supply chains; and



- The proposed development provides opportunities for businesses seeking strategic locations near the Western Sydney Airport and delivers employment lands specifically tailored to agribusiness which has been identified as a growth sector.

The proposed development is therefore justified in the context of biophysical, social, and economic environments, as well as the proposal's alignment with the objects of the EP&A Act and other statutory instruments applicable to the site.

### 3.5 Consideration of Feasible Alternatives

Section 192(c) of the EP&A Regulation requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development. The following options were considered to address the strategic need and project objectives.

#### 3.5.1 Option 1: Do Nothing

Under the 'Do Nothing' scenario, the site would remain in its current state, functioning primarily as a poultry farm and fundamentally inconsistent with the envisaged outcomes for the site as established in the Aerotropolis Planning Framework and the broader strategic planning policies outlined in **Section 3.1** above. The consequences of not proceeding with the proposal would result in a significant missed opportunity to realise the site's potential for agribusiness purposes, ultimately yielding minimal economic benefit and employment generation for the Western Parkland City and Aerotropolis.

This option does not adhere to the objectives of section 1.3(c) of the EP&A Act in relation to orderly planning and economic use of land. This option was therefore no longer considered by the Proponent.

#### 3.5.2 Option 2: Preferred Layout Plan

The layout for the proposed subdivision is largely determined by the Aerotropolis Planning Framework. Chapter 4 of the Precinct Plan deals with *Urban Structure* and establishes the comprehensive objectives and requirements that guide the layout of the subdivision of the Aerotropolis, including the blue-green grid infrastructure, transport and movement networks. There are no viable or realistic alternative subdivision layouts for the site that maintain consistency with the Precinct Plan. The proposed subdivision layout has been prepared in accordance with Section 3 of the Precinct Plan, specifically considering the following key figures:

- Land Use Plan (Figure 3) with respect to development layout, open space areas, and environmental value;
- The Blue-Green Infrastructure Framework (Figures 5-7) that identifies areas of open space etc; and
- Transport and Street Network Plan (Figures 8-10).

In addition to the above, the proposed subdivision layout takes into account the key opportunities and constraints identified as part of the detailed site investigations and urban design analysis. The design thoughtfully responds to the cultural and environmental themes that emerged during the Design Jam workshops facilitated by Yerrabingin, as well as the principles established in the Connecting with Country Framework Report. This integrated approach ensures the development respects both the physical characteristics of the site and its deeper cultural significance within the landscape.

Most importantly, the proposed subdivision takes into consideration the feedback from key agencies and authorities engaged as part of the design process, in particular the feedback of the SDRP (refer to **Section 7.3**). Further assessment of the urban design outcomes is provided in the Urban Design Report at **Appendix PP**.



## 4. PROJECT DESCRIPTION

### 4.1 Description of Development

The proposed development seeks consent for the following:

- Torrens title subdivision of the site into eight (8) lots comprising:
  - Three (3) development lots (Lots 1, 3 and 4);
  - One (1) lot containing the stormwater infrastructure for future acquisition by Sydney Water (Lot 2);
  - Two (2) residue lots (Lot 5 and 6);
  - Two (2) lots within the Willmington Road reserve to facilitate the future road closure and land acquisition;
- Bulk and detailed earthworks, including cut and fill, benching, battering and any required ground dewatering to create three (3) developable lots; stockpiling of topsoil and earthworks on Lot 5;
- Decommissioning of one (1) dam located at the northwestern corner of the site to facilitate installation of stormwater infrastructure, and dewatering and subsequent backfilling of two (2) dams;
- Construction of road infrastructure (sub-arterial, collector, and park edge roads), including temporary cul-de-sacs;
- Integrated water cycle management works, including stormwater infrastructure, trunk services connections, detention basins, bioretention systems, a reuse pond and temporary irrigation areas, designed to manage both the interim and ultimate water management solutions for the site, including up to 1% AEP events;
- Tree and vegetation removal and landscaping, including the provision of street trees and footpaths;
- Provision and augmentation of essential services, lead-in infrastructure, utilities and servicing;
- Works outside the property boundary, including the demolition, remediation, and decommissioning of the turning bay on Willmington Road, and associated reinstatement works;
- Construction of a new road and intersection on Willmington Road reserve;
- Provision of Temporary works over the Residue Lots including:
  - Lots 5 and 6:
    - Integrated Water Cycle Management works, which involve temporary works for the purposes of irrigation to meet the Sydney Water requirements;
  - Lot 5:
    - Stockpiling of topsoil and earthworks;
    - Temporary turning head; and
    - Interim Operating Procedure.

The Concept Plan of Subdivision is included at **Appendix P** and shown in **Figure 10**. It is noted that all works at this stage are limited to the northern portion of the site (i.e., development extent), apart from the following temporary works on Lot 5:

- Integrated water cycle management works, which involves temporary works for the purposes of irrigation to meet the Sydney Water requirements;
- Stockpiling of topsoil and earthworks;
- Temporary turning head; and
- Interim Operating Procedure.



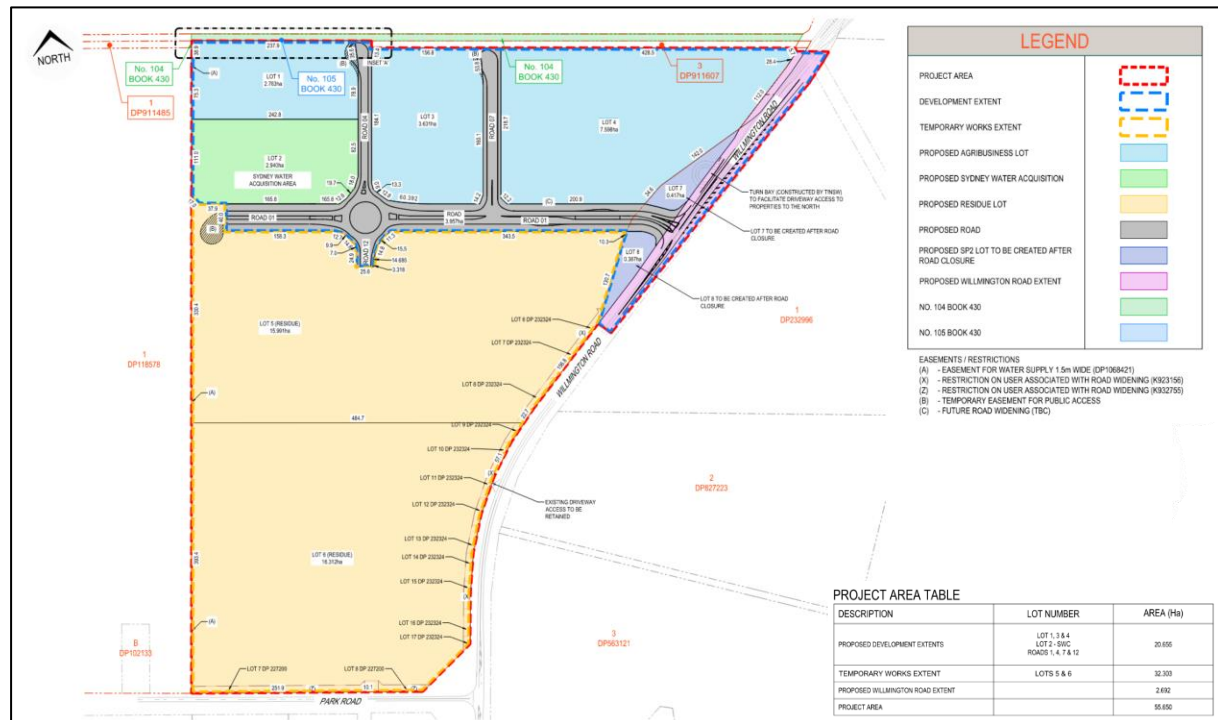


Figure 10: Concept Plan of Subdivision

Source: Orion Group, 2025

## 4.2 Key Development Particulars

The key project details regarding the proposed development are outlined in **Table 7** below.

| Table 7: Key Development Particulars |                                                                                                                                                                                                                    |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Element                              | Particular                                                                                                                                                                                                         |
| Project area                         | 55.65 hectares, including: <ul style="list-style-type: none"> <li>52.96 hectares of land owned by the Proponent</li> <li>2.69 hectares of land comprising the Willmington Road Reserve</li> </ul>                  |
| Land use                             | This SSD does not seek consent for land use or built form.                                                                                                                                                         |
| Demolition                           | Demolition of existing turning bay and associated pavements on Willmington Road.<br><br><u>Note.</u> The demolition of the existing built form on site and remediation works are approved under <b>DA24/0421</b> . |
| Tree removal                         | This SSDA seeks the removal of 97 trees and one (1) group of trees within the project area.                                                                                                                        |
| Landscaping                          | Public domain works including street tree plantings and landscaping within the proposed road network and stormwater infrastructure.                                                                                |
| Canopy cover                         | 18,232m <sup>2</sup> (26.88%) including the canopy cover in the stormwater infrastructure lot (Lot 2).                                                                                                             |
| <b>Subdivision</b>                   |                                                                                                                                                                                                                    |



**Table 7: Key Development Particulars**

| Element                                     | Particular                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Subdivision                                 | Subdivision of the site into eight (8) lots including the lot for the proposed Sydney Water Basin. The proposed subdivision will establish road lot for the internal access roads.<br><br>It is noted that the proposed subdivision of the land within the Willmington Road reserve will facilitate the future road closure as requested by Council.                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                    |
|                                             | Lot                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Area                                                                                                                                                                                                                                                                                                                               |
|                                             | Lot 1 (Development Lot #1)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2.763 hectares                                                                                                                                                                                                                                                                                                                     |
|                                             | Lot 2 (Stormwater Infrastructure Lot)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2.940 hectares                                                                                                                                                                                                                                                                                                                     |
|                                             | Lot 3 (Development Lot #2)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 3.631 hectares                                                                                                                                                                                                                                                                                                                     |
|                                             | Lot 4 (Development Lot #3)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 7.598 hectares                                                                                                                                                                                                                                                                                                                     |
|                                             | Lot 5 (Residue lot)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 15.991 hectares                                                                                                                                                                                                                                                                                                                    |
|                                             | Lot 6 (Residue lot)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 16.312 hectares                                                                                                                                                                                                                                                                                                                    |
|                                             | Lot 7 (Roads)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 0.417 hectares                                                                                                                                                                                                                                                                                                                     |
|                                             | Lot 8 (Roads)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 0.387 hectares                                                                                                                                                                                                                                                                                                                     |
| Integrated Water Management and Civil Works |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                    |
| Earthworks/Cut and Fill                     | <ul style="list-style-type: none"><li>▪ Bulk and detailed earthworks including groundwater dewatering across the development extent including site preparation, fill importation, grading and benching;</li><li>▪ 86,300m<sup>3</sup> of net cut and 97,000m<sup>3</sup> of net fill equating to an overall balance of 0m<sup>3</sup>;</li><li>▪ Temporary stockpiling of the 34,710m<sup>3</sup> topsoil and earthworks on the Lot 5 (residue lot); and</li><li>▪ No retaining walls are proposed.</li></ul>                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                    |
| Infrastructure and Services                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                    |
| Roads                                       | <p>The existing left-in left-out driveway access points to Willmington Road would be used during the initial stages of site establishment and construction activities.</p> <p>The proposal includes the development of an internal road network and associated intersections to provide access to individual development lots. The proposed road network has been designed in a manner that is consistent with the transport network in the Precinct Plan.</p> <p>A temporary cul-de-sac is proposed to connect the local industrial road to the north of the site as identified in the Aerotropolis Precinct Plan. The proposed road network complies with the street sections provided in the Western Sydney Aerotropolis DCP.</p> |                                                                                                                                                                                                                                                                                                                                    |
| Integrated management                       | Water                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | The Water Management Plan consists of on-lot primary treatment in the form of gross pollutant traps and on-site detention systems for peak flow management. Flows from lots and road areas are conveyed by the road pit and pipe drainage system to secondary and tertiary treatment consisting of a sediment basin, wetland, bio- |



**Table 7: Key Development Particulars**

| Element                                                               | Particular                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                       | retention basin, stormwater re-use pond and temporary irrigation. Temporary stormwater controls for quantity and quality are provided on Lot 4 until such time as the downstream Sydney Water infrastructure becomes operational. The stormwater conveyance systems consist of a minor system to convey 5% AEP flows, and a major system designed to safely cater for flows up to a 1% AEP event. A trunk drainage channel conveys 1% AEP flows once the upstream catchment exceeds 15 hectares.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Essential services (water, sewer, electricity and telecommunications) | <ul style="list-style-type: none"> <li>▪ <u>Potable Water Supply:</u> The existing DN200 potable water main currently serves as the current primary water source for the site. However, to meet the water demand for the proposed development, an interim service line from the existing Sydney Water main may be required subject to ongoing discussions with Sydney Water. The ultimate scenario consists of constructing a reservoir along with a booster pumping station and trunk mains. Hydraulic modelling will be necessary to determine the exact capacity and ensure adequate supply;</li> <li>▪ <u>Wastewater:</u> The proposed development will be serviced by a low-pressure sewer system or gravity system connecting to the Agribusiness gravity carrier and the Upper South Creek Advanced Water Recycling Centre. However, this infrastructure is not anticipated to be delivered until 2027/2028. Sydney Water has approved an interim strategy for the site that consists of tanks holding the incoming flows. Tankers will periodically collect and dispose of the wastewater at an approved facility;</li> <li>▪ <u>Recycled Water:</u> The internal subdivision will be reticulated with recycled water, via a cross-connection to the site proposed potable water network ahead of the regional trunk infrastructure. The regional infrastructure to be provided in future involves the development of the Kemps Creek Advanced Water Recycling Centre. This shall provide treated stormwater and/or recycled wastewater to the site in the ultimate scenario;</li> <li>▪ <u>Electricity Supply:</u> The electricity demand will be met by the Western Sydney Airport 22kV Zone Substation by the end of 2026. A feeder cable will be installed along Elizabeth Drive and Willmington Road, with additional infrastructure and placing the existing overhead networks below ground; and</li> <li>▪ <u>Telecommunications:</u> Agreements with NBN will provide the necessary telecommunications infrastructure, with fibre supply assured once the first stage of the pit and pipe network is completed. Coordination with these providers six (6) months before the anticipated works will help ensure timely service delivery.</li> </ul> |
| <b>Construction Details</b>                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Construction hours within property boundary                           | <p>Monday to Friday: 7:00am to 6:00pm</p> <p>Saturday: 8:00am to 1:00pm</p> <p>No work on Sundays or public holidays</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |



**Table 7: Key Development Particulars**

| Element                                | Particular                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Construction hours on Willmington Road | It is anticipated that some localised out-of-hours work would be required to minimise traffic disruptions on Willmington Road.                                                                                                                                                                                                                                                                                                                                                             |
| <b>Other Details</b>                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Estimated development cost             | \$36,246,935 exclusive of GST                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Estimated number of jobs               | As the application is for subdivision only, operational employment is reported as potential employment associated with future agribusiness development of 13.5 hectares across Lots 1, 3 and 4. Employment has been estimated using per-hectare employment density benchmarks by use type: <ul style="list-style-type: none"> <li>Logistics/warehousing (12-20 jobs/ha)</li> <li>Food processing/light industrial (25-40 jobs/ha); and</li> <li>Office/R&amp;D (50-80 jobs/ha).</li> </ul> |

### 4.3 Connecting with Country

The proposed development has been informed by a deep understanding of Country and recognises the importance of embedding cultural knowledge into the planning and design. The Connecting with Country Framework Report (**Appendix Q**) prepared by Yerrabingin, an indigenous cultural design and research organisation, ensures the outcomes for the Country and community are positive. Through meaningful engagement process with the local Aboriginal community groups and stakeholders and a Walk on Country and Design Jam led by Yerrabingin were undertaken to ensure the proposal responds to Country and community aspirations from local Aboriginal stakeholders.

The Designing with Country Guide provides principles and strategic inputs that have fundamentally shaped the site layout. The key themes identified in the Designing with Country Guide include:

- Wianamatta - 'of the Mother Creek';
- Connected Landscape; and
- Celebrating Dharug.

These insights have been thoughtfully translated into tangible design elements and well-integrated into the proposed subdivision layout and landscape-led design build on landscape palettes, and public art opportunities. The Landscape Design Report & Plans at **Appendix GG** confirms that the key lessons and inspirations drawn from Country that have informed the design response are:

- The Blue Line (the story and journey of water in the landscape);
- The Green Line (the story of Country); and
- The Ochre Line (the story of people).

This approach transcends conventional development practices by weaving Indigenous knowledge into every aspect of the design process.

### 4.4 Urban Design and Site Layout

The requirements of the Aerotropolis Precinct Plan and the DCP, has largely informed the Concept Plan of Subdivision, including the blue-green grid infrastructure and the transport and movement networks. The proposed layout achieves optimal configurations required to accommodate larger format employment generating and industrial uses in the Agribusiness Zone, whilst ensuring the key constraints within the site are protected. The proposal delivers the following:



- A landscape-led design that integrates with the natural topography, views to Blue Mountains, and reflects elements of Country. The proposal has been spatially designed to respond to the natural and built hazards and considerations which affect the site, including water management, flood affectation, bushfire protection, and aviation safeguarding;
- Provision of integrated water management systems that integrates Country led Water Sensitive Urban Design (WSUD) and supported by a landscape-led approach that maximises tree canopy coverage and perviousness while ensuring public accessibility for recreational purposes;
- Provision of integrated water management systems designed to meet the relevant water quality and quantity targets and integration of integrated landscape design that maximises tree canopy coverage and perviousness while ensuring public accessibility for recreational purposes;
- Delivery of an intersection on Willmington Road and the proposed sub-arterial road that provides access through the site. The proposed subdivision layout recognises the views to the Blue Mountains and beyond and aligns the proposed street network with the east-west view corridor. This will enable the pedestrians to experience these views from the public domain; and
- An internal road network that supports and facilitates safe heavy vehicle movements consistent with industrial and/or warehouse and logistics uses across the site, while also being future-proofed for potential bus routes.

#### **4.5 Landscape Design**

The proposed landscaping strategy is detailed at the Landscape Design Report & Plans at **Appendix GG**.

##### **4.5.1 Landscape Design within the Development Extent**

The landscape design intends to invite workers and visitors into the landscape to engage with the natural environment and responds to the core themes of Country identified as part of the Walk on Country and Design Jam with Aboriginal stakeholders and community groups.

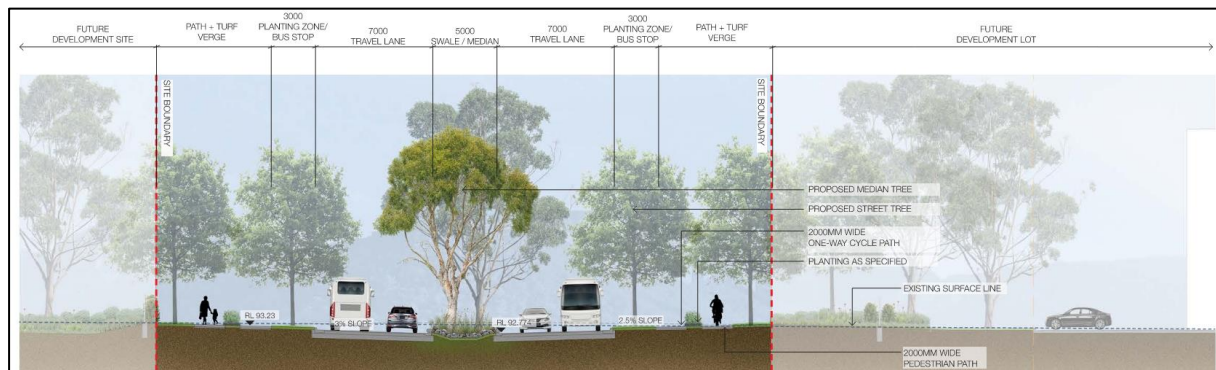
**Figure 11** illustrates the proposed Landscape Concept Plan within the development extent. The public domain and street tree landscaping proposed are illustrated in detail in the Landscape Design Report & Plans at **Appendix GG**.

Typical sections and plans for the street tree plantings along the proposed collector and local industrial roads are illustrated in **Figure 12** below.

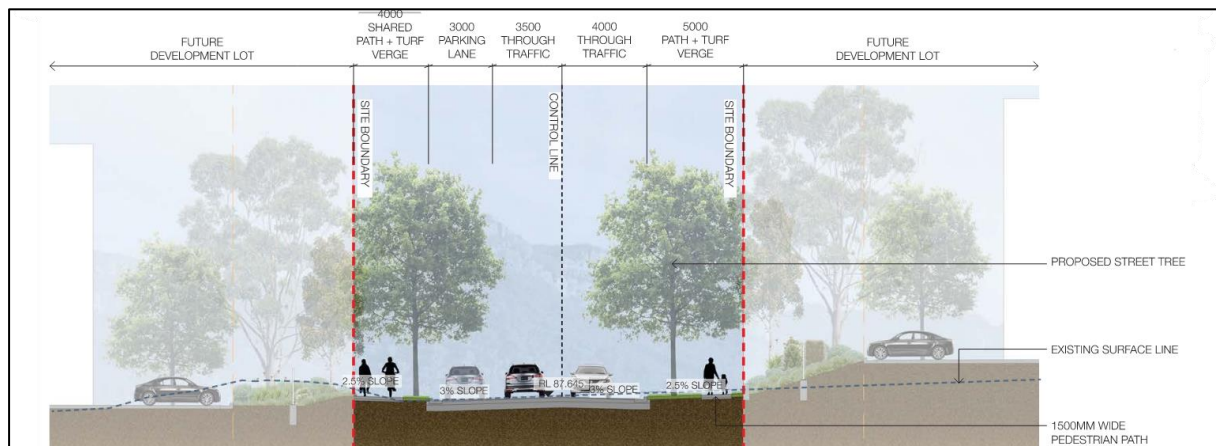


**Figure 11: Landscape Illustrative Masterplan**

Source: Habit8, 2025



**Sub-Arterial Road**



**Open Space Edge Road**

**Figure 12: Typical Street Sections**

Source: Habit8, 2025



In a general sense, the strategy for revegetating the site focuses on canopy tree planting to reduce the urban heat island effect whilst simultaneously creating a sustainable, resilient, and vibrant environments that support both ecological health and community wellbeing. A mix of both endemic and exotic tree species are proposed, with trees to be densely planted along street verges, boundary buffers and road setbacks, ranging from 6m to 15m+ in height and canopy spread. Vegetation for additional shade coverage will be provided over car parking areas, cycleways and pedestrian footpaths. This approach not only enhances the attractiveness of the industrial estate but also contributes to the broader goals of sustainability and economic growth in Western Sydney Aerotropolis precinct.

#### **4.5.2 Public Domain and Tree Canopy Coverage**

The landscape design along the sub arterial road has been carefully designed to celebrate and frame views to Blue Mountains. The proposed street planting provides an extensive improvement to the site and surrounding locality through a visually and physically integrated design that activates the streetscape, provides tangible public benefits, incorporates sophisticated landscape treatments, and enhances natural surveillance.

The following design features of the public domain streets are proposed:

- Establish comprehensive tree canopy coverage to mitigate urban heat island effects;
- Deliver safe and accessible movement infrastructure for pedestrians and cyclists;
- Create endemic canopy tree connectivity throughout the development to support ecological corridors;
- Frame visual connections to the Blue Mountains through strategic road alignment;
- Accommodate multi-modal transport requirements including heavy vehicle, passenger vehicle, pedestrian and cyclist access;
- Soften and screen the bulk of the future development.
- Help create a cooler microclimate around buildings and along pedestrian routes.;
- Integrate lighting for safety;
- Allow safe passage for visitors and workers to experience the Willmington Road Corridor interface;
- Strengthen the connection from Elizabeth Road through improvements to Willmington Road; and
- Incorporate WSUD principles into the streetscape including water quality bio-swales, vegetated detention basins and grey water re-use.

The proposed landscape design incorporates extensive provision for canopy trees throughout the road network, resulting in the planting of 280 street trees with a canopy cover of 12,574m<sup>2</sup>. Additionally, Lot 2 (infrastructure lot for future acquisition by Sydney Water) will deliver 96 trees across and a canopy coverage of 5,658m<sup>2</sup>.

The landscape design wholly achieves a tree canopy coverage of 376 trees across 18,232m<sup>2</sup> (26.88%) including the canopy cover in the stormwater infrastructure lot (Lot 2).

This represents a substantial ecological improvement over existing site conditions and aligns with broader sustainability objectives for the precinct.





Figure 13: Street Tree Concept Plan

Source: Habit8, 2025

#### 4.6 Site Preparation and Establishment Works

Site preparation activities are proposed to facilitate the proposal:

##### 4.6.1 Dam Dewatering

The proposed development involves decommissioning of one (1) dam located at the northwestern corner of the site to facilitate installation of stormwater infrastructure, and dewatering and subsequent backfilling of two (2) dams. All dam-dewatering will be undertaken in accordance with the Dam Dewatering Plan prepared for the site and included at **Appendix T**. This strategy ensures environmental protection measures and appropriate water management techniques are implemented throughout the dewatering process.

##### 4.6.2 Vegetation Removal

The site preparation works includes the removal of existing vegetation across the development extent. The proposal involves the removal of 97 trees and one (1) group of trees to facilitate site grading or new surfacing.

#### 4.7 Transport, Parking and Access

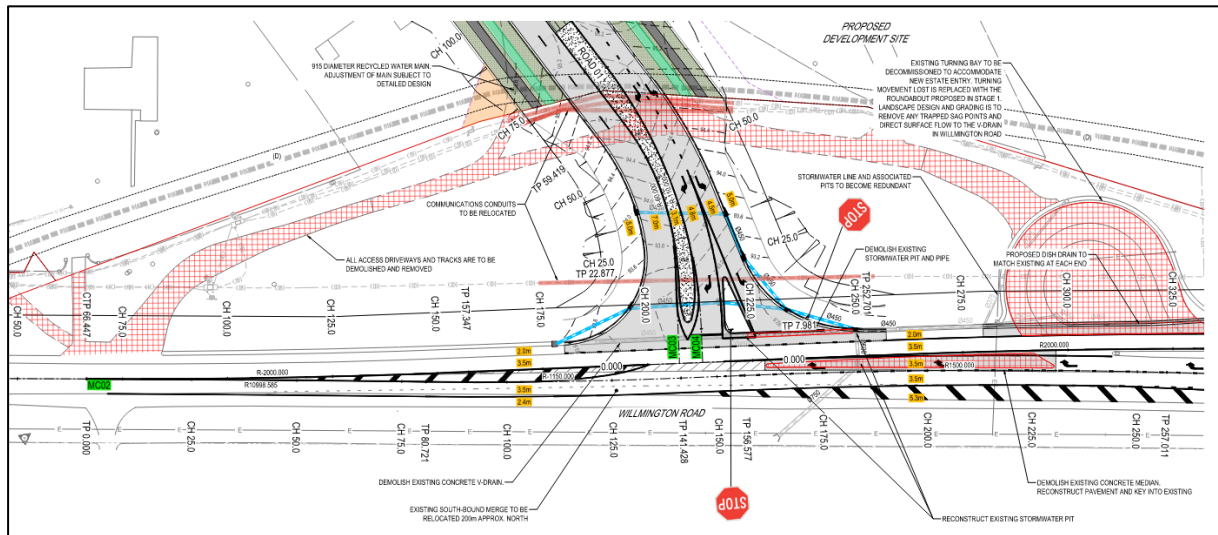
##### 4.7.1 Access and Road Network

###### External Roadworks

The proposal seeks approval for the establishment of an internal road network layout which will feature access to the site via a new intersection with Willmington Road. Works outside the property boundary include the demolition and decommissioning of the existing turning bay on Willmington Road, and

construction of an unsignalised intersection between Willmington Road and the proposed sub-arterial road.

The design and location of the intersection on Willmington Road have been developed in collaboration with TfNSW. The overall intersection layout is shown in **Figure 14** below.



**Figure 14: Layout of the Intersection on Willmington Road**

Source: Orion Group, 2025

### Vehicular Access and Internal Roads

The proposed road infrastructure involves construction of an internal road network in accordance with the alignment and road typologies established in the Precinct Plan, as demonstrated in **Figure 15**.

This includes four (4) distinct typologies:

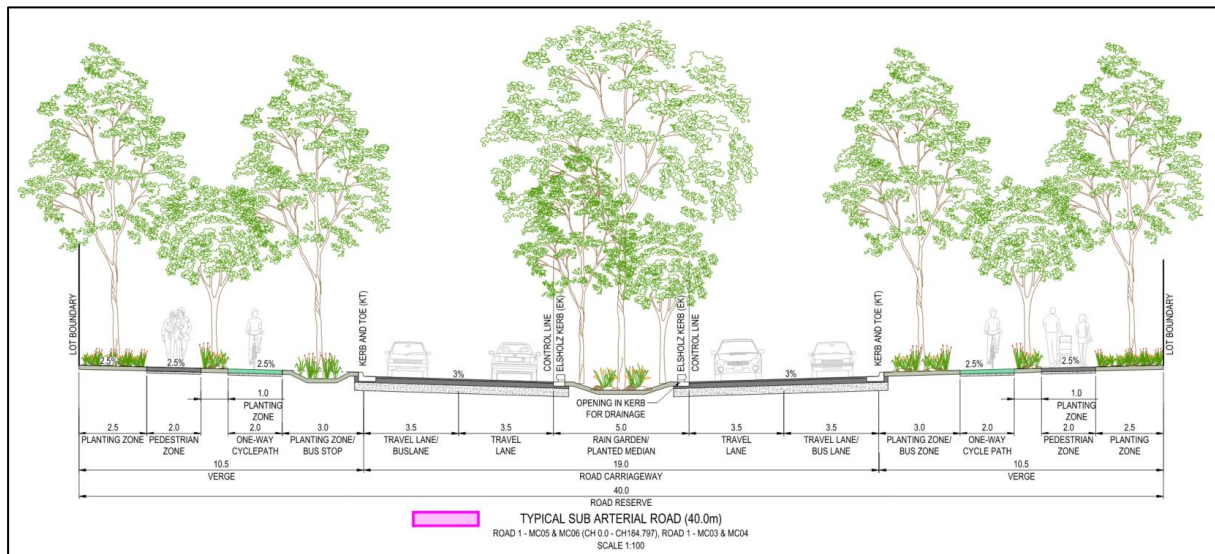
- Sub-arterial Road 40m wide, serving as the primary circulation route;
- Collector Road, 25.6m wide, providing secondary access and future vehicle access to the development lots;
- Local Industrial Road, 24m wide, providing kerbside parking and any required bus stops; and
- Open Space Road, 19.5m wide, creating an interface with Lot 2 (stormwater infrastructure lot).

The proposed road network complies with the street sections provided in the DCP.

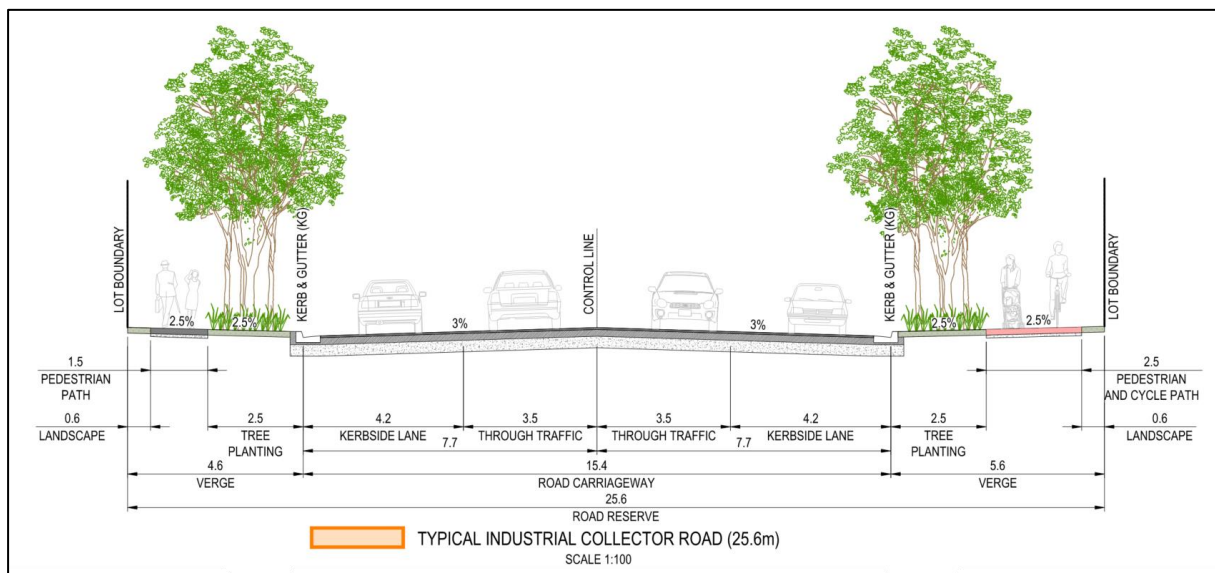
The sub-arterial road is designed to function as the main spine road through the site, running east-west, with the broader hierarchy of streets providing efficient access to all development lots. All constructed roads will be dedicated to Council upon completion, ensuring ongoing public maintenance and access.

Please see **Figure 15** below for cross-sections of the road typologies that are proposed within the development extent.

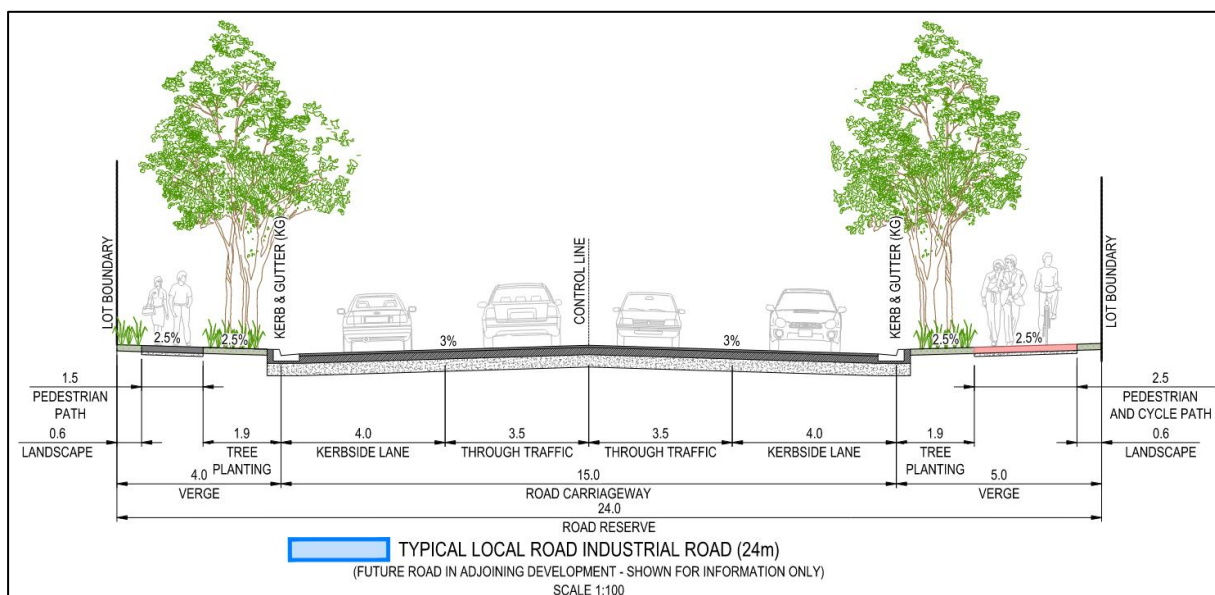




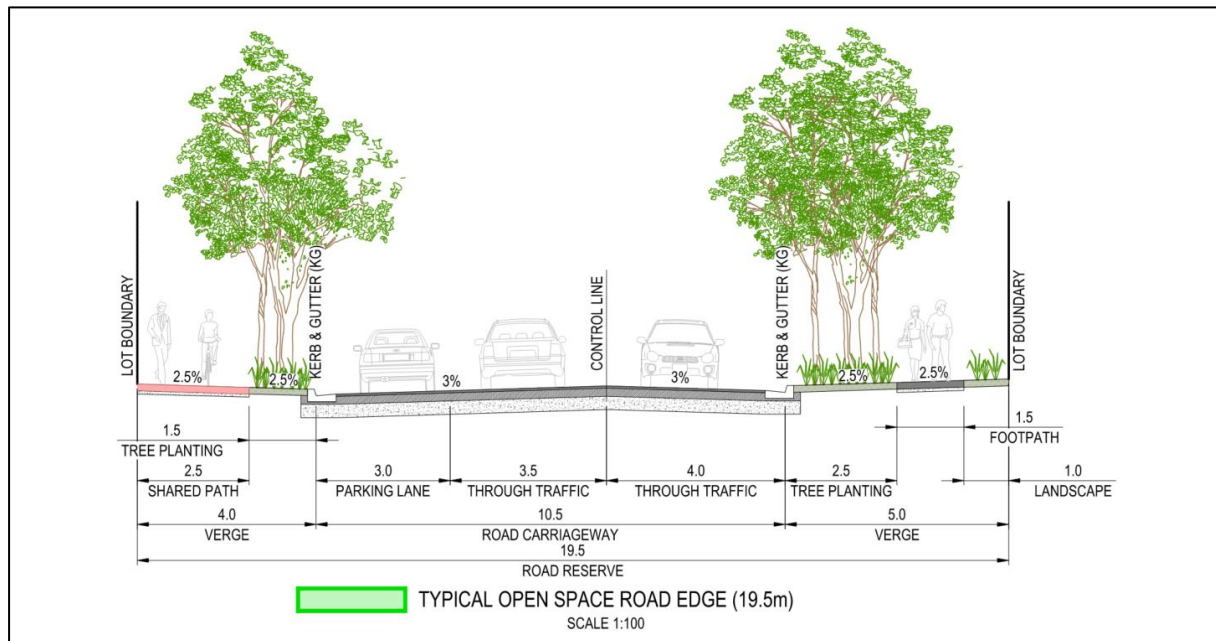
Sub-arterial Road



Collector Road



Local Road



Open Space Road

**Figure 15: Typical Road Cross Sections**

Source: Orion Group, 2025

#### Temporary Works

It is proposed to provide temporary turning heads in the north-south roads until there is connectivity with future development.

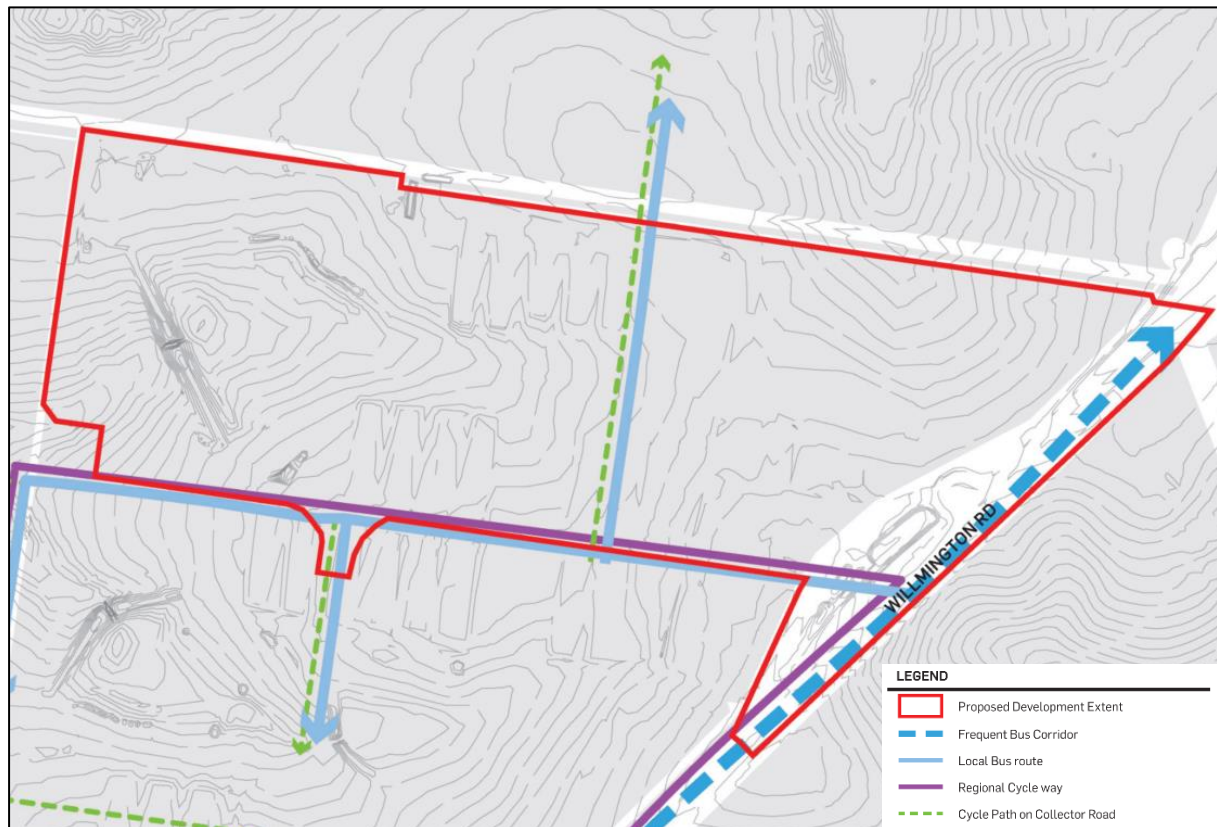
#### 4.7.2 Future Public & Active Transport Routes

The Precinct Plan indicates that the proposed sub-arterial road may accommodate future rapid bus services. The proposed road network design has been designed to be bus capable to future proof the site for any, future bus routes.

The Precinct Plan seeks to establish a new pedestrian and cycling network within the site. This includes a 3.1m wide shared pedestrian and cycle path within the road reserve of the sub-arterial and collector roads and will provide connections to the broader precinct.







**Figure 16. Public and Active Transport Plan**

Source: Urbis, 2025

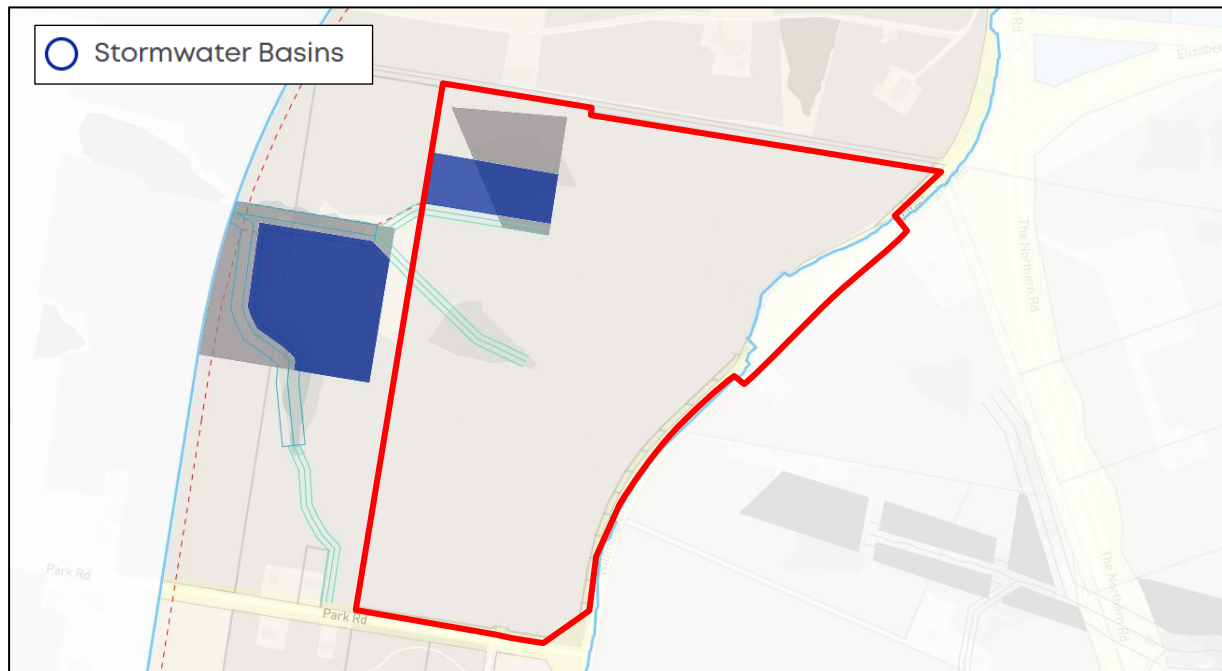
#### 4.8 Integrated Water Management

Stormwater and water cycle management for the development has been designed in a manner that is consistent with Sydney Water's standards and the precinct stormwater strategy under the Precinct Plan and DCP. A range of proposed stormwater management practices are detailed in the Water Management Plan at **Appendix EE**.

Most importantly, the northwestern portion of the site is reserved for acquisition by Sydney Water for the provision of stormwater infrastructure. This area nominated for acquisition appears to be based on the configuration of the existing farm dam, refer **Figure 18**.

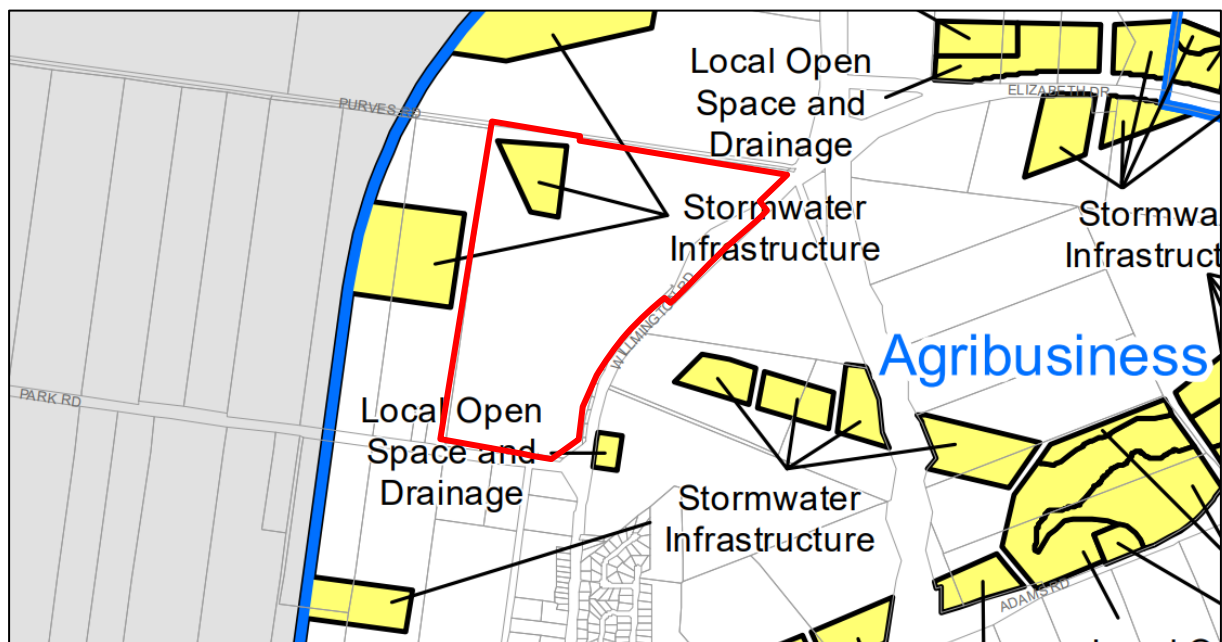
The Concept Plan of Subdivision at **Appendix P** indicates that an area of 2.94ha is allocated for stormwater infrastructure and is incorporated into Lot 1.

The Proponent has consulted with Sydney Water to rationalise the shape of this infrastructure. It is noted that the outcomes of consultation with Sydney Water regarding the realignment of stormwater infrastructure, including evidence of in principle support, is supplied within the Sydney Water Feasibility Letter appended to **Appendix DD**. This is further confirmed by the basin location as shown in the new Draft Integrated Stormwater Scheme for Duncans Mulgoa released by Sydney Water, see **Figure 17** below.



**Figure 17. Draft Integrated Stormwater Scheme for Duncans Mulgoa**

Source: Sydney Water, 2025



**Figure 18. Land Acquisition Map**

Source: NSW Government, 2025

The proposed Integrated Water Management Strategy has been developed with consideration of three (3) project phases:

**Phase 1 (Subject Application – Super Lots)**

Site grading of Stage 1 lots, with supporting roads and drainage infrastructure. Includes a proposed wetland, bio-retention system and stormwater re-use pond to be designed and constructed under a works in kind agreement with Sydney Water. The design of the stormwater conveyance system and treatment facilities are to be designed to accommodate future Phases 2 and 3:



- Temporary on-site detention basins located on Lots 1, 3 and 4. Under this phase these lots will be graded and stabilised until future on-lot development occurs. Temporary OSD is required to over-compensate for road areas that are freely draining; and
- Lot 2 - Sydney Water Assets are to be constructed to meet the water quality and quantity objectives of the DCP under fully developed (Phases 2 and 3) conditions.

#### Phase 2 (Subject to Future Applications – Developed Lots)

Lots fully developed with stormwater to be conveyed and treated by the infrastructure constructed under Phase 1. Under this scenario no other external Sydney Water infrastructure is assumed to be operational.

- Gross pollutant traps are to be provided on Lots 1, 3 and 4;
- On-Site Detention is to be provided on Lots 1,3 and 4;
- Water quality and Mean Annual Runoff Volume (MARV) objectives for Lots 1, 3 and the West drainage portion of Lot 4 to be met by the Sydney Water assets to be constructed in Lot 2;
- Temporary water quality devices to be provided on the portion of Lot 4 draining to the North; and
- Temporary water storage and irrigation measures to be provided for the portion of Lot 4 draining to the North.

#### Phase 3 – (Ultimate State)

All external Sydney Water infrastructure is assumed to be operational.

Further discussion is provided at **Section 7.9** of this EIS.

### **4.9 Site Servicing and Utilities**

An assessment has been undertaken to determine the capacity for the site to be serviced by relevant infrastructure and utilities. The Infrastructure Servicing Report (**Appendix DD**) identifies the existing services and infrastructure within the vicinity of the site and the proposed augmentation connection required to service the proposal. The delivery of utilities and services has been informed by ongoing consultation with the relevant service providers who have confirmed that the site can be serviced, subject to some infrastructure upgrades.

Please see **Section 7.11** of this EIS for details regarding the utility connections including electricity, communication, potable water supply, sewer and gas.

### **4.10 Earthworks and Dam Dewatering**

Bulk earthworks and grading are proposed to create three (3) development lots and road corridors suitable for the future land uses. The strategy for the proposed earthworks is summarised below:

- Create development lots that respond to the end user and provide flexibility to cater for a range of agribusiness uses;
- Respond to the natural topography and seek to match the existing predeveloped topography where possible;
- Create the required stormwater catchments and provide a solution that results in a balanced site, i.e., no requirement to import or export material from site; and
- Provide an earthworks solution that retains all soils native to the existing site within the proposed development.



#### **4.11 Waste Management**

##### **4.11.1 Demolition and Construction Waste**

A Waste Management Plan accompanies the application (**Appendix QQ**) and details the waste management protocols to be followed during demolition and construction. This is discussed in more detail in **Section 7.23** of this EIS.

#### **4.12 Sustainability and Resource Use Management**

The proposed development incorporates several sustainable design measures and environmentally conscious initiatives. The following outlines a summary of the key initiatives that have been incorporated into the proposed development, which will improve the environmental performance of the development and deliver long-term energy efficiency:

##### Water Management

- Water sensitive urban design, including development of stormwater basins for water re-use and habitat, and a stormwater management design that meets applicable quantity and quality criteria.

##### Biodiversity

- Landscape-led design built on connecting with Country principles, which amongst other things provides for tree canopy of approximately 12,574m<sup>2</sup> on the road infrastructure;
- The proposed landscape strategy provides numerous environmental benefits, such as creating a natural habitat for local wildlife without impacting the operations of the Western Sydney Airport, improved tree canopy and mitigating the urban heat island effect; and
- Landscaping with low water use and indigenous plant species.

##### Waste

- Diversion of construction waste from landfill.

An Ecologically Sustainable Development Report at **Appendix W** sets out the various sustainability initiatives incorporated into the development.

#### **4.13 Fencing, Lighting and Security**

The proposed development would include fencing, lighting and security installations, including:

- Installation of 1.8m high chain wire fencing around the residue Lot (Lot 5) at the frontage to the sub-arterial road;
- Installation of bollards adjacent to the breakout areas on the sub-arterial road to control vehicular entry;
- Installation of closed circuit TV security networks integrated with the estate roads, and
- Installation of security lighting.

All external lighting would be installed in compliance with AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting.

#### **4.14 Construction Environmental Management**

A CEMP Framework has been prepared and is provided at **Appendix R** and addresses the following matters. Environmental protection and management measures will be adopted:

- Erosion and Sediment Control;
- Water Quality Management Measures;



- Material management;
- Health and safety;
- Equipment/materials staging and parking;
- Dust control measures;
- Noise and vibration monitoring strategy;
- Traffic Management; and
- Methods for disposal of demolition waste.

It is noted that a detailed CEMP will be prepared by the appointed contractor prior to the commencement of construction.

#### **4.15 Staging and Delivery Programme**

The proposed development is not staged and this SSDA seeks detailed approval for all development works on the site; however, the works may be delivered over multiple construction approvals (Subdivision Works Certificates) with corresponding Subdivision Certificates.

A provisional project delivery schedule and timeframe is as follows:

Construction work will be undertaken in four (4) development phases:

- Phase 1 involves site preparation and establishment works, including the installation of erosion and sediment control measures, dewatering and decommissioning of dams and clearing of vegetation;
- Phase 2 involves earthworks, including bulk and detailed operations such as cut and fill, benching, and battering. Additionally, this phase includes the completion of early lead-in infrastructure works and trunk service connections.;
- Phase 3 involves the construction of internal roads and a stormwater infrastructure network, including footpaths, landscaping, signage, linemarking, and utility infrastructure. It also includes integrated water management works, such as stormwater detention, retention, water quality systems, and landscaping embellishments; and
- Phase 4 involves the construction of a new intersection on Willmington Road and the demolition and decommissioning of the existing turning bay. This phase also includes footpaths, landscaping, signage, linemarking, and utility infrastructure, with general construction continuing alongside excavation activities.

Subject to the approval of this SSDA, the construction work is anticipated to commence in 2027. Upon commencement, the construction programme is expected to extend over 9-12 months. This timeframe is provisional only. It is noted that this programme is indicative only and will be refined at a later stage based on discussions with the head contractor.





## 5. STATUTORY CONTEXT

This section of the EIS outlines the key statutory requirements that must be considered prior to the determination of this SSDA and where those requirements have been addressed in the EIS. This section is also complemented by a statutory compliance table at **Appendix B** that identifies all statutory planning requirements relevant to the proposal.

### 5.1 Power to Grant Approval

**Table 8** summarises the relevant requirements in accordance with the SSD Guidelines.

| Table 8: Power to Grant Consent |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Matter                          | Consideration                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Declaration of SSD              | <p>Development consent will be sought under 'Division 4.7 - Stage Significant Development' of the EP&amp;A Act. Section 4.36(2) of the EP&amp;A Act states that:</p> <p><i>A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.</i></p> <p>Schedule 1 of Planning Systems SEPP lists development that is declared SSD. Schedule 1, clause 29, provides the following:</p> <p><i>29 Development in the Western Sydney Aerotropolis</i><br/> <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></p> <p><i>(a) has an estimated development cost of more than \$30 million, and</i><br/> <i>(b) does not involve development—</i></p> <p><i>(i) prohibited under the Chapter, or</i><br/> <i>(ii) to which that Policy, section 4.13A applies.</i></p> <p>The site is located in the Aerotropolis and is permitted with development consent. The proposed development has an EDC of \$36,246,935 (refer to <b>Appendix X</b>)</p> <p>Accordingly, the proposed development is SSD.</p> |
| Consent Authority               | <p>Section 4.5 of the EP&amp;A Act and Section 2.7 of the Planning Systems SEPP stipulate that the consent authority is the Minister for Planning (or the Department as their delegate) unless the development triggers the matter set out in Section 2.7(1) in which case the consent authority will be with the Independent Planning Commission. The Proponent has not made a reportable political donation in connection with the development application.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

### 5.2 Permissibility

The permissibility of the proposed development, considering the proposed land uses and land zoning, is outlined in **Table 9** below.



**Table 9: Permissibility**

| Matter         | Consideration                                                                                                                                                         |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Land use       | The proposal does not seek consent for a land use and associated built form works on each lot which will be the subject of separate development applications.         |
| Land Zoning    | The site is zoned Agribusiness pursuant to the Western Parkland City SEPP.                                                                                            |
| Permissibility | In accordance with Section 4.14 of the Western Parkland City SEPP, the proposed subdivision of land and associated works are permitted only with development consent. |

### 5.3 Other Approvals

**Table 10** below outlines the legislative approvals required for the proposed development in addition to a development consent under Division 4.7 of the EP&A Act.

**Table 10: Other Approvals**

| Matter                                                                                                                                               | Consideration                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Approvals not required for SSD                                                                                                                       | Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for SSD. The following legislative approvals would otherwise be required if the proposal was not SSD. |                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                                                                      | Act                                                                                                                                                                                        | Approval Otherwise Required                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                                      | A permit under section 201, 205 or 219 of the <i>Fisheries Management Act 1994</i>                                                                                                         | No                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                                                                      | An approval under Part 4, or an excavation permit under section 139, of the <i>Heritage Act 1977</i>                                                                                       | No                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                                                                      | An Aboriginal heritage impact permit under section 90 of the <i>National Parks and Wildlife Act 1974</i>                                                                                   | No                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                                                                      | A bush fire safety authority under section 100B of the <i>Rural Fires Act 1997</i>                                                                                                         | Yes                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                                                      |                                                                                                                                                                                            | <u>Note.</u> Rural workers' dwellings, a type of residential accommodation, are permitted with development consent in the AGB zone. Whilst the proposal does not seek consent for rural worker dwellings, given the proposed development involves Torrens title subdivision and rural workers dwelling are a permitted form of development, the proposal may require approval under s100B of the <i>Rural Fires Act 1997</i> . |
| A water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference | No                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                |



**Table 10: Other Approvals**

| Matter                                                                                                                                                                            | Consideration                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------------|-------------------------------------------------------------------------------------|----|---------------------------------------------------------------------------------------|----|-------------------------------------------------|----|------------------------------------------------------------------|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|----------------------------------------------------------|-----|-----------------------------------------------|----|
|                                                                                                                                                                                   | approval) under section 91 of the <i>Water Management Act 2000</i> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
| Consistent approvals                                                                                                                                                              | <p>Section 4.42 of the EP&amp;A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out SSD and must be substantially consistent with the consent.</p> <table border="1"> <thead> <tr> <th data-bbox="464 539 1114 577">Legislation</th><th data-bbox="1114 539 1406 577">Approval Required</th></tr> </thead> <tbody> <tr> <td data-bbox="464 577 1114 663">An aquaculture permit under section 144 of the <i>Fisheries Management Act 1994</i></td><td data-bbox="1114 577 1406 663">No</td></tr> <tr> <td data-bbox="464 663 1114 741">An approval under section 22 of the <i>Coal Mine Subsidence Compensation Act 2017</i></td><td data-bbox="1114 663 1406 741">No</td></tr> <tr> <td data-bbox="464 741 1114 786">A mining lease under the <i>Mining Act 1992</i></td><td data-bbox="1114 741 1406 786">No</td></tr> <tr> <td data-bbox="464 786 1114 864">A production lease under the <i>Petroleum (Onshore) Act 1991</i></td><td data-bbox="1114 786 1406 864">No</td></tr> <tr> <td data-bbox="464 864 1114 1010">An environment protection licence under Chapter 3 of the <i>Protection of the Environment Operations Act 1997</i> (for any of the purposes referred to in section 43 of that Act)</td><td data-bbox="1114 864 1406 1010">No</td></tr> <tr> <td data-bbox="464 1010 1114 1055">A consent under section 138 of the <i>Roads Act 1993</i></td><td data-bbox="1114 1010 1406 1055">Yes</td></tr> <tr> <td data-bbox="464 1055 1114 1099">A licence under the <i>Pipelines Act 1967</i></td><td data-bbox="1114 1055 1406 1099">No</td></tr> </tbody> </table> | Legislation | Approval Required | An aquaculture permit under section 144 of the <i>Fisheries Management Act 1994</i> | No | An approval under section 22 of the <i>Coal Mine Subsidence Compensation Act 2017</i> | No | A mining lease under the <i>Mining Act 1992</i> | No | A production lease under the <i>Petroleum (Onshore) Act 1991</i> | No | An environment protection licence under Chapter 3 of the <i>Protection of the Environment Operations Act 1997</i> (for any of the purposes referred to in section 43 of that Act) | No | A consent under section 138 of the <i>Roads Act 1993</i> | Yes | A licence under the <i>Pipelines Act 1967</i> | No |
| Legislation                                                                                                                                                                       | Approval Required                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
| An aquaculture permit under section 144 of the <i>Fisheries Management Act 1994</i>                                                                                               | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
| An approval under section 22 of the <i>Coal Mine Subsidence Compensation Act 2017</i>                                                                                             | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
| A mining lease under the <i>Mining Act 1992</i>                                                                                                                                   | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
| A production lease under the <i>Petroleum (Onshore) Act 1991</i>                                                                                                                  | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
| An environment protection licence under Chapter 3 of the <i>Protection of the Environment Operations Act 1997</i> (for any of the purposes referred to in section 43 of that Act) | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
| A consent under section 138 of the <i>Roads Act 1993</i>                                                                                                                          | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
| A licence under the <i>Pipelines Act 1967</i>                                                                                                                                     | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |
| EPBC Act                                                                                                                                                                          | <p>If the proposed development will or is likely to impact a matter of national environmental significance ('MNES'), then referral to the federal Department of the Environment is required.</p> <p>This process is necessary to determine whether a proposed activity is a 'controlled action' that requires approval under the EPBC Act. Currently, bilateral agreements allow the Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when accessing a controlled action under the EPBC Act.</p> <p>As outlined in the Biodiversity Assessment and the BDAR Waiver (<b>Appendix I</b> and <b>Appendix J</b>), the proposed development is not likely to impact an ecological MNES. Similarly, the Aboriginal Cultural Heritage Assessment (<b>Appendix E</b>), and Statement of Heritage Impact <b>Appendix NN</b>) notes the proposal is not likely to impact a heritage-related MNES. Therefore, the proposed development is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |             |                   |                                                                                     |    |                                                                                       |    |                                                 |    |                                                                  |    |                                                                                                                                                                                   |    |                                                          |     |                                               |    |



## 5.4 Pre-Conditions

**Table 11** outlines the pre-conditions to exercising the power to grant consent that are relevant to the proposal and the section where these matters are addressed within the EIS.

| Table 11: Pre-Conditions                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                           |                                                                                    |
|--------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| Statutory Reference                                                                                    | Pre-Condition                                                                                                                                                                                                                                                                                                                                                                                                                  | Relevance                                                                                                                                                                                                 | Section in the EIS/Document Reference                                              |
| <b>Environmental Planning &amp; Assessment Regulation 2021</b>                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                           |                                                                                    |
| 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 on land in the Western Sydney Aerotropolis under Western Parkland City SEPP unless the application includes unless the application is accompanied by an assessment of the consistency of the development with the Western Sydney Aerotropolis Plan and any precinct plan.                                                      | Consistency with the WSAP and Precinct Plan is required.                                                                                                                                                  | <b>Appendix B</b>                                                                  |
| Section 66 - Contributions plans for certain areas in Sydney:                                          | A development application for development on the following land must not be determined by the consent authority unless a contributions plan has been approved for the land in the Western Sydney Aerotropolis.<br><br>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 Penrith Contribution Plan has been finalised and applies to the proposed development.                                                                                                                 | <b>Section 7.22</b>                                                                |
| <b>State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                           |                                                                                    |
| Section 4.6 - Contamination and remediation to be considered in                                        | Clause 4.6 stipulates that a consent authority must not consent to the carrying out of development unless: <ul style="list-style-type: none"> <li>It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be</li> </ul>                                                                                              | Matters relating to contamination and remediation within the site have been addressed under <b>DA24/0421</b> and are not a subject of this SSDA. Therefore, in accordance with the Resilience and Hazards | <b>Section 7.12</b><br><br>DSI and RAP at <b>Appendix V</b> and <b>Appendix KK</b> |



| <b>Table 11: Pre-Conditions</b>                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                         |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| <b>Statutory Reference</b>                                                          | <b>Pre-Condition</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Relevance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Section in the EIS/Document Reference</b>                                                                                            |
| development application                                                             | <p>suitable, after remediation) for the purpose for which the development is proposed to be carried out; and</p> <ul style="list-style-type: none"> <li>If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.</li> </ul>                                                                                                                                                                                                                                                             | <p>SEPP, the site can be made suitable for any future agribusiness development.</p> <p>For works on the Willmington Road frontage, the DSI at <b>Appendix V</b> did not suggest widespread contamination that could preclude the development of the site. Notwithstanding, remediation action has been recommended to ensure the site can be made suitable or any future agribusiness use. A RAP has been prepared and is available at <b>Appendix KK</b></p> |                                                                                                                                         |
| <b>State Environmental Planning Policy (Precincts - Western Parkland City) 2021</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                         |
| Part 4.3 Airport safeguarding                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                         |
| Section 4.19 - Wildlife hazards                                                     | <p>(2) Development consent must not be granted to relevant development on land in the 13 km wildlife buffer zone unless the consent authority—</p> <ul style="list-style-type: none"> <li>has consulted the relevant Commonwealth body, and</li> <li>has 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, which includes— <ul style="list-style-type: none"> <li>species, size, quantity, flock behaviour and the particular times of day or year when the wildlife is likely to be present, and</li> </ul> </li> </ul> | <p>The project area is located within the 13-km and 3-km buffer zone. Whilst the proposal does not seek consent for land use, an assessment of wildlife that is likely to be present as a result of the proposed stormwater infrastructure and landscaping has been prepared.</p>                                                                                                                                                                             | <p><b>Section 7.15</b></p> <p>Wildlife Hazard Assessment and Wildlife Management Plan in <b>Appendix RR</b> and <b>Appendix SS</b>.</p> |





| Table 11: Pre-Conditions |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                              |                                                                              |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| Statutory Reference      | Pre-Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Relevance                                                                                                                                                                                                                    | Section in the EIS/Document Reference                                        |
|                          | <ul style="list-style-type: none"> <li>○ whether any of the wildlife is a threatened species, and</li> <li>○ a description of how the assessment was carried out, and</li> <li>▪ is satisfied that the development will mitigate the risk of wildlife to the operation of the Airport, including, for example, measures relating to— <ul style="list-style-type: none"> <li>○ waste management, landscaping, grass, fencing, stormwater or water areas, or</li> <li>○ the dispersal of wildlife from the land by the removal of food or the use of spikes, wire or nets</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                              |                                                                              |
| Section 4.21 - Lighting  | <p>Development consent must not be granted to development for the following purposes on land shown as the “6km Lighting Intensity Radius”, a “Light Control Zone” or a “Runway Boundary” on the Lighting Intensity and Wind Shear Map unless the consent authority has consulted the relevant Commonwealth body—</p> <ul style="list-style-type: none"> <li>▪ installation and operation of external lighting (whether coloured or white lighting) in connection with development for the following purposes— <ul style="list-style-type: none"> <li>○ classified roads,</li> <li>○ freight transport facilities,</li> <li>○ heavy industrial storage establishments,</li> <li>○ recreation facilities (major),</li> <li>○ recreation facilities (outdoor),</li> </ul> </li> <li>▪ installation and operation of external lighting in connection with construction works that is likely to</li> </ul> | <p>The site is located within the 6km Lighting Intensity Radius. Whilst the proposed development does not include identified development, external lighting associated with construction works may require consultation.</p> | <p><b>Section 7.15</b></p> <p>Lighting Certificate at <b>Appendix HH</b></p> |



| Table 11: Pre-Conditions                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                       |                                                                                |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| Statutory Reference                          | Pre-Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Relevance                                                                                                                                                                                             | Section in the EIS/Document Reference                                          |
|                                              | be obtrusive or create light spill outside the land on which the construction works are carried out.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                       |                                                                                |
| <b>Part 4.4 General development controls</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                       |                                                                                |
| Section 4.24 - Flood planning                | <p>(3) Development consent must not be granted to development on land to which this section applies unless the development—</p> <ul style="list-style-type: none"> <li>is compatible with the flood hazard of the land, taking into account projected changes as a result of climate change, and</li> <li>is not likely to significantly adversely affect flood behaviour resulting in detrimental increases in the potential flood affectation of other development or properties, and</li> <li>incorporates appropriate measures to manage risk to life from flood, and</li> <li>will enable safe occupation of and evacuation from flood prone land, and</li> <li>is not likely to significantly adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses, and</li> <li>is not likely to result in unsustainable social and economic costs to the community as a consequence of flooding, and</li> <li>is consistent with any relevant floodplain risk management plan adopted by the council for the land in accordance with the Flood Risk Management Manual.</li> </ul> | Parts of the site are identified on the Flood Planning Map as located within the 1 in 100 AEP Flood Extent. A Flood Impact Assessment report has considered the post development and flood behaviour. | <p><b>Section 7.10</b></p> <p>Flood Impact Assessment at <b>Appendix Z</b></p> |



| Table 11: Pre-Conditions                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                           |                                       |
|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Statutory Reference                                                                                         | Pre-Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Relevance                                                                                                                 | Section in the EIS/Document Reference |
|                                                                                                             | <p>(4) Development consent may be granted to development on land below the flood planning level only if the development—</p> <ul style="list-style-type: none"> <li>▪ does not involve earthworks that will affect flood storage capacity or flood behaviour, and</li> <li>▪ (b) is not located in a floodway or flood storage area.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                           |                                       |
| Section 4.25 – Preservation of trees and vegetation in Environment and Recreation Zone and Cumberland Plain | <p>(4) Development consent under subsection (3) must not be granted unless the consent authority is satisfied that, in relation to the disturbance of native vegetation caused by the clearing—</p> <ul style="list-style-type: none"> <li>▪ there is no reasonable alternative available to the disturbance of the native vegetation, and</li> <li>▪ any impact of the proposed clearing on biodiversity values is avoided or minimised, and</li> <li>▪ the disturbance of the native vegetation will not increase salinity, and</li> <li>▪ native vegetation inadvertently disturbed for the purposes of construction will be re-instated where possible on completion of construction, and</li> <li>▪ the loss of remnant native vegetation caused by the disturbance will be compensated by revegetation on or near the land to avoid a net loss of remnant native vegetation, and</li> </ul> <p>the clearing of the vegetation is unlikely to cause or increase soil erosion, salination, land slip, flooding, pollution or other adverse land or water impacts.</p> | The development does not seek consent for the removal of trees and vegetation within the Environment and Recreation Zone. | N/A                                   |



| <b>Table 11: Pre-Conditions</b>                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| <b>Statutory Reference</b>                                                                                            | <b>Pre-Condition</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Relevance</b>                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Section in the EIS/Document Reference</b>                                            |
| Section 4.27 -                                                                                                        | (1) Development consent must not be granted to the following development unless the consent authority has obtained the concurrence of Transport for NSW— <ul style="list-style-type: none"> <li>development on transport corridor land with an estimated development cost of more than \$200,000,</li> </ul> development that involves the penetration of 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 EDC of the development exceeds \$200,000                                                                                                                                                                                                                                                                                                                                                                                                 | The SSDA will be referred to TfNSW.                                                     |
| Section 4.28B - Aboriginal cultural guidelines and Recognise Country: Guidelines for development in the Aerotropolis. | Development consent must not be granted to development on land to which this Policy applies unless the consent authority has considered Recognise Country: Guidelines for development in the Aerotropolis published in November 2022 on the Department's website.                                                                                                                                                                                                                                           | All development within the Aerotropolis must be considered against these draft Guidelines.                                                                                                                                                                                                                                                                                                                                                   | <b>Section 7.2</b><br><br>Connecting with Country Framework Report at <b>Appendix Q</b> |
| <b>Part 4.5 Design excellence</b>                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                         |
| Section 4.31 - Design review panel                                                                                    | (2) Development consent must not be granted to the development unless— <ul style="list-style-type: none"> <li>a design review panel reviews the development, and</li> <li>the consent authority takes into account the findings of the design review panel, and</li> <li>the consent authority is of the opinion that the development exhibits design excellence.</li> </ul>                                                                                                                                | The proposed development meets the relevant threshold 4.31 (design review panel), which applies to the Proposal as it is within the Western Parkland City Area, is SSD, has an EDC greater than \$30 Million and has a site area greater than 10,000m <sup>2</sup> . Two (2) SDRP meetings have been undertaken in accordance with the SEARs. These meetings took place on 13 November 2024 and 19 March 2025. The findings of the SDRP have | <b>Section 7.2</b><br><br>Urban Design Report at <b>Appendix PP</b>                     |



| Table 11: Pre-Conditions                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                 |
|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| Statutory Reference                                              | Pre-Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Relevance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section in the EIS/Document Reference                           |
|                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | been addressed in detail in the project design and discussed in the EIS, Design Excellence Strategy and SDRP Response Table.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                 |
| Part 4.7 Precinct Plans and Master Plans                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                 |
| Section 4.39 - Development must be consistent with precinct plan | <p>(1) Development consent must not be granted to development on land to which a precinct plan applies unless the consent authority is satisfied that the development is consistent with the precinct plan.</p> <p>(2) Subsection (1) does not apply if—</p> <ul style="list-style-type: none"> <li>▪ the consent authority has considered a written request from the applicant that seeks to justify an inconsistency by demonstrating that— <ul style="list-style-type: none"> <li>○ the inconsistency is minor, and</li> <li>○ consistency with the plan is unreasonable or unnecessary in the circumstances, and</li> <li>○ sufficient environmental planning grounds justify the inconsistency, and</li> </ul> </li> <li>▪ the consent authority is satisfied that— <ul style="list-style-type: none"> <li>○ the applicant's written request adequately addresses the matters required to be demonstrated by paragraph (a), and</li> <li>○ the development is consistent with the strategic vision and general objectives for the precinct.</li> </ul> </li> </ul> | <p>The Precinct Plan has statutory weight under Chapter 4 of the Western Parkland City SEPP.</p> <p>Under the Western Parkland City SEPP, development must be consistent with a Precinct Plan however there is flexibility to consider variations where the inconsistency is minor, consistency would be unreasonable and unnecessary, and there are sufficient environmental planning grounds to justify the inconsistency.</p> <p>In line with section 4.39, a written request to amend parts of the Precinct Plan have been provided in the Statutory Compliance Table – Precinct Plan.</p> | Statutory Compliance Table – Precinct Plan<br><b>Appendix B</b> |





| Table 11: Pre-Conditions                     |                                                                                                                                                                                                                                                                                                                                                              |                                     |                                                                                  |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------------------------------------|
| Statutory Reference                          | Pre-Condition                                                                                                                                                                                                                                                                                                                                                | Relevance                           | Section in the EIS/Document Reference                                            |
| Section 4.49 - Public utility infrastructure | (1) Development consent must not be granted to development to which this Division applies unless the consent authority is satisfied that— <ul style="list-style-type: none"> <li>public utility infrastructure that is essential for the development is available, or</li> <li>the public utility infrastructure will be available when required.</li> </ul> | Division applies to the development | <b>Section 7.11</b><br><br>Infrastructure Servicing Report at <b>Appendix DD</b> |

## 5.5 Matters for Mandatory Consideration

**Table 12** identifies the matters that the consent authority must consider in deciding to grant consent to this SSDA. It also identifies the section(s) of this EIS and the appended documents that address these mandatory matters.

| Table 12: Matters for Mandatory Consideration              |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                 |
|------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| Legislation/Statutory Reference                            | Matters for Consideration                                                                                                                                                                                                                                                                                                                                                                                                                   | Section in EIS/Document Reference               |
| <b>Consideration under the EP&amp;A Act and Regulation</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                 |
| Clause 1.3                                                 | Relevant objects of the EP&A Act                                                                                                                                                                                                                                                                                                                                                                                                            | Statutory compliance table at <b>Appendix B</b> |
| Clause 4.15                                                | Relevant environmental planning instruments: <ul style="list-style-type: none"> <li>Chapters 2, 6 and 11 of <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> (Biodiversity and Conservation SEPP)</li> <li>Planning Systems SEPP</li> <li>Resilience and Hazards SEPP</li> <li><i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (Transport and Infrastructure SEPP)</li> </ul> | Statutory compliance table at <b>Appendix B</b> |



| <b>Table 12: Matters for Mandatory Consideration</b> |                                                                                                                                                                      |                                                                      |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| <b>Legislation/Statutory Reference</b>               | <b>Matters for Consideration</b>                                                                                                                                     | <b>Section in EIS/Document Reference</b>                             |
|                                                      | <ul style="list-style-type: none"> <li>Chapter 4 of the Western Parkland City SEPP</li> <li>Precinct Plan</li> </ul>                                                 |                                                                      |
|                                                      | Relevant draft environmental planning instruments                                                                                                                    | There are no known draft EPIs that apply to the site or this SSDA.   |
|                                                      | Relevant development control plan <ul style="list-style-type: none"> <li>Western Sydney Aerotropolis Development Control Plan Phase 2</li> </ul>                     | Statutory compliance table at <b>Appendix B</b>                      |
|                                                      | Relevant planning agreements or draft planning agreements.                                                                                                           | The site is not subject to any planning agreements.                  |
|                                                      | The Regulations                                                                                                                                                      | Statutory compliance table at <b>Appendix B</b>                      |
|                                                      | The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality. | <b>Section 8</b>                                                     |
|                                                      | Suitability of the proposed development                                                                                                                              | <b>Section 8</b>                                                     |
|                                                      | Submissions made in accordance with this Act or the regulation                                                                                                       | Submissions will be considered following the exhibition of the SSDA. |
|                                                      | The public interest.                                                                                                                                                 | <b>Section 8.7</b>                                                   |
| Clause 4.24                                          | The proposed development is not a concept proposal.                                                                                                                  | N/A                                                                  |
| <b>Consideration under EPI</b>                       |                                                                                                                                                                      |                                                                      |
| <b>Chapter 4 of the Western Parkland City SEPP</b>   |                                                                                                                                                                      |                                                                      |
| Clause 4.12 – Zone Objectives and Land Use Table     | The Western Parkland City SEPP includes the following relevant considerations that will be fully addressed in the EIS.                                               | Statutory compliance table at <b>Appendix B</b>                      |



| <b>Table 12: Matters for Mandatory Consideration</b>                                                      |                                                                                                         |                                          |
|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|------------------------------------------|
| <b>Legislation/Statutory Reference</b>                                                                    | <b>Matters for Consideration</b>                                                                        | <b>Section in EIS/Document Reference</b> |
| Clause 4.14 – Subdivision                                                                                 | The proposed development is generally consistent with the provisions of the Western Parkland City SEPP. |                                          |
| Clause 4.15 – Demolition Requires Development Consent                                                     |                                                                                                         |                                          |
| Clause 4.17 – Aircraft Noise                                                                              |                                                                                                         |                                          |
| Clause 4.18 – Building Wind Shear and Turbulence                                                          |                                                                                                         |                                          |
| Clause 4.19 – Wildlife Hazards                                                                            |                                                                                                         |                                          |
| Clause 4.20 – Wind Turbines                                                                               |                                                                                                         |                                          |
| Clause 4.21 – Lighting                                                                                    |                                                                                                         |                                          |
| Clause 4.22 – Airspace Operations                                                                         |                                                                                                         |                                          |
| Clause 4.23 – Public Safety                                                                               |                                                                                                         |                                          |
| Clause 4.24 – Flood Planning                                                                              |                                                                                                         |                                          |
| Clause 4.25 – Preservation of Trees and Vegetation in Environment and Recreation Zone and Cumberland Plan |                                                                                                         |                                          |
| Clause 4.25A – Clearing of Native Vegetation                                                              |                                                                                                         |                                          |
| Clause 4.26 – Heritage Conservation                                                                       |                                                                                                         |                                          |
| Clause 4.27 – Transport Corridors                                                                         |                                                                                                         |                                          |



| Table 12: Matters for Mandatory Consideration                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
|------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| Legislation/Statutory Reference                                  | Matters for Consideration                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Section in EIS/Document Reference                                                                                                          |
| Clause 4.28 - Warragamba Pipelines                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
| Clause 4.28B - Aboriginal Cultural Guidelines                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
| Clause 4.31 - Design Review Panel                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
| Clause 4.33 - Consideration of Design Excellence                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
| Clause 4.39 - Developments must be Considered with Precinct Plan |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
| Clause 4.49 - Public Utility Infrastructure                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
| Resilience and Hazards SEPP                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
| Section 4.14                                                     | A consent authority must consider whether the site is contaminated, if the land is contaminated, it is satisfied that the land is suitable in its contaminated state, or if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose. A consent authority must consider the findings of a preliminary investigation of the site, prepared in accordance with the contaminated land planning guidelines. A detailed site investigation may be required if the findings of the preliminary investigation warrant such an investigation. | <b>Section 7.12</b><br><br>Geotechnical Investigation at <b>Appendix AA</b><br><br>DSI and RAP at <b>Appendix V</b> and <b>Appendix KK</b> |
| Transport and Infrastructure SEPP                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
| Section 2.48                                                     | Development likely to affect an electricity transmission or distribution network.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Statutory compliance table at <b>Appendix B</b>                                                                                            |



| <b>Table 12: Matters for Mandatory Consideration</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                 |
|------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| <b>Legislation/Statutory Reference</b>               | <b>Matters for Consideration</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Section in EIS/Document Reference</b>        |
|                                                      | The consent authority must consider any response to a written notice issued to electricity supply authority for the area that is received within 21 days.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                 |
| <b>Biodiversity and Conservation SEPP</b>            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                 |
|                                                      | <p>The following chapters apply to the site and the proposed development</p> <ul style="list-style-type: none"> <li>▪ Chater 2 Vegetation in non-rural areas;</li> <li>▪ Chapter 6 Water Catchments; and</li> <li>▪ Chapter 13 Strategic conservation planning.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Statutory compliance table at <b>Appendix B</b> |
| <b>Western Sydney Aerotropolis Precinct Plan</b>     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                 |
|                                                      | <p>The Precinct Plan has statutory weight under Chapter 4 of the Western Parkland City SEPP.</p> <p>Under the Western Parkland City SEPP, development must be consistent with a Precinct Plan; however, there is flexibility to consider variations where the inconsistency is minor, consistency would be unreasonable and unnecessary, and there are sufficient environmental planning grounds to justify the inconsistency.</p> <p>The proposed development is generally consistent with the Precinct Plan, apart from the following</p> <ul style="list-style-type: none"> <li>▪ Variation to the location of one (1) regional stormwater basin based on discussions with Sydney Water.</li> </ul> <p>It is noted, however, that the location of this basin is consistent with the newly released Draft Integrated Stormwater Scheme for Duncans Mulgoa.</p> | Statutory compliance table at <b>Appendix B</b> |
| <b>Development Control Plan</b>                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                 |



| <b>Table 12: Matters for Mandatory Consideration</b>            |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Legislation/Statutory Reference</b>                          | <b>Matters for Consideration</b>                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Section in EIS/Document Reference</b>                                                                                                                                                                                                        |
| Western Sydney Aerotropolis Development Control Plan 2022       | The Aerotropolis DCP provides the planning, design and environmental objectives and controls which will inform the preparation and assessment of development applications (DA's). These objectives and controls supplement those in the Precinct Plan and will be addressed in detail within the EIS.                                                                                                                                       | Statutory compliance table at <b>Appendix B</b>                                                                                                                                                                                                 |
| Connection with Country Framework for the Aerotropolis          | The Connecting with Country Framework provides a structured approach for incorporating Aboriginal cultural heritage, knowledge, and practices into the planning, design, and delivery of the Western Sydney Aerotropolis.                                                                                                                                                                                                                   | <b>Section 7.2</b><br>Connecting with Country Framework Report at <b>Appendix Q</b>                                                                                                                                                             |
| Aviation Safeguarding Guidelines for the Aerotropolis           | The purpose of these guidelines are to: <ul style="list-style-type: none"> <li>Assist relevant planning authorities, consultants and proponents when assessing and, preparing development applications which are impacted by aviation safeguarding controls;</li> <li>Protect community safety and amenity; and</li> <li>Safeguard the 24-hour operations of the Western Sydney International (Nancy-Bird Walton) Airport (WSI).</li> </ul> | <b>Section 7.15</b><br>Aeronautical Impact Assessment at <b>Appendix F</b><br><br>Wildlife Hazard Assessment and Wildlife Hazard Management Plan at <b>Appendix SS</b> and <b>Appendix TT</b><br><br>Lighting Certificate at <b>Appendix HH</b> |
| <b>Contribution Plans</b>                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                 |
| Western Sydney Aerotropolis Special Infrastructure Contribution | The Western Sydney Aerotropolis Special Infrastructure Contribution (SIC) is a developer contribution to fund infrastructure in the Aerotropolis precinct, including roads, open space, and community facilities. It was implemented in March 2022 and will be in place until June 2026, after which the Housing and Productivity Contribution will apply.                                                                                  | Any required conditions will be imposed as a condition of consent.                                                                                                                                                                              |
| Penrith Aerotropolis Local Contributions Plan                   | The Penrith Aerotropolis Development Contributions Plan came into effect on 14 August 2024 and applies to the site.                                                                                                                                                                                                                                                                                                                         | Any required contributions will be imposed as a condition of consent.                                                                                                                                                                           |
| <b>Consideration under other legislation</b>                    |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                 |
| <i>Commonwealth Environment Protection and Biodiversity</i>     | This process is necessary to determine whether a proposed activity is a 'controlled action' that requires approval under the EPBC Act. Currently, bilateral agreements allow the                                                                                                                                                                                                                                                            | <b>Section 7.18</b>                                                                                                                                                                                                                             |





| <b>Table 12: Matters for Mandatory Consideration</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                |
|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| <b>Legislation/Statutory Reference</b>               | <b>Matters for Consideration</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Section in EIS/Document Reference</b>                                                                       |
| Conservation Act 1999 (EPBC Act)                     | <p>Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when accessing a controlled action under the EPBC Act.</p> <p>As outlined in the Biodiversity Assessment (<b>Appendix I</b>), the proposed development is not likely to have a significant impact on any MNES</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | BDAR Waiver is provided at <b>Appendix J</b>                                                                   |
| BC Act                                               | <p>Clause 7.9 of the BC Act applies to SSD applications and requires SSD applications to be accompanied by a BDAR unless it is determined that the proposal is not likely to have any significant impact on biodiversity values.</p> <p>The site is biodiversity certified 'urban capable' under the CPCP. As such, assessment under the BC Act, namely the preparation of a BDAR is no longer required for site. A Biodiversity Assessment at <b>Appendix I</b> has been prepared that describes biodiversity values on site, provides evidence of biodiversity certification and consistency with the CPCP. The land where works are proposed outside the boundaries of the site and within the project area are identified as 'excluded land' under the CPCP.</p> <p>A BDAR Waiver has been prepared for works within a small area of land within the project area excluded under the CPCP adjacent to Willmington Road.</p> | <p>Biodiversity Assessment Report at <b>Appendix I</b></p> <p>BDAR Waiver is provided at <b>Appendix J</b></p> |
| Federal Airports Act 1996                            | The proposed development does not include activities that result in intrusions into prescribed airspace and controlled activities that may require approval under section 182 of the <i>Federal Airports Act 1996</i> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p><b>Section 7.15</b></p> <p>Aeronautical Impact Assessment at <b>Appendix F</b></p>                          |



## 6. COMMUNITY ENGAGEMENT

This section of the EIS gives an overview of the consultation and engagement activities carried out and explains how this engagement has influenced the proposal. This section also sets out the engagement that will be carried out following lodgement of the EIS. It is supported by an Engagement Outcomes Report included at **Appendix C**.

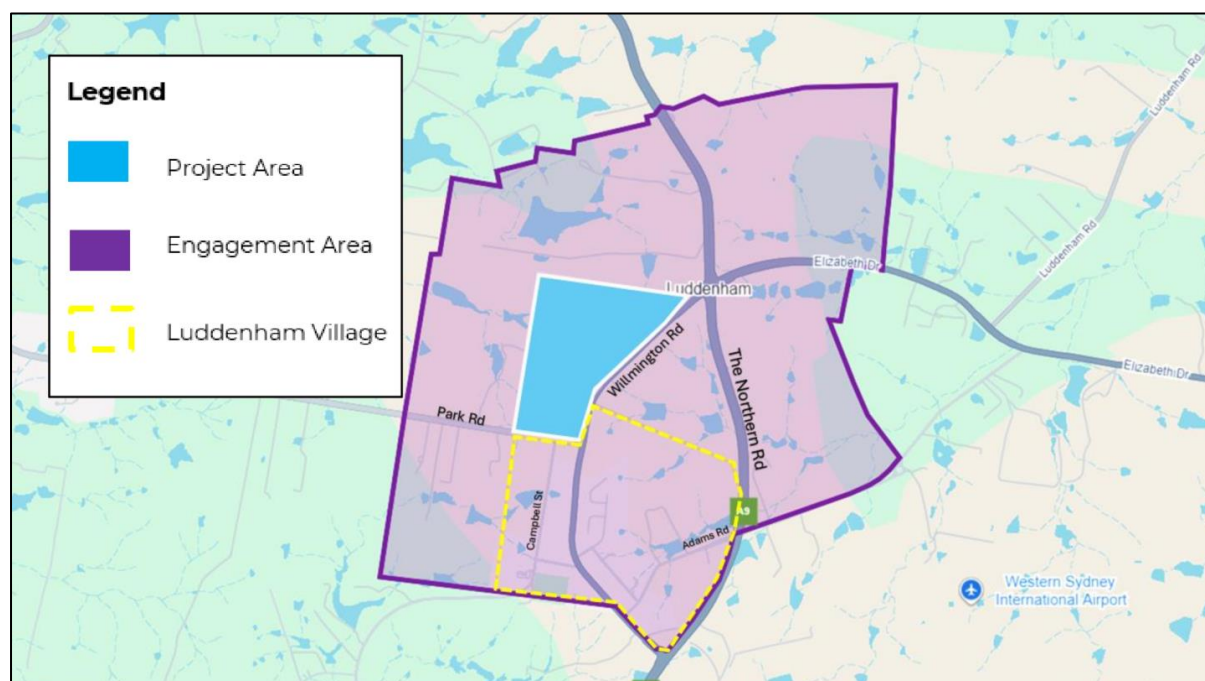
### 6.1 Engagement Carried Out

Community and stakeholder engagement has been undertaken by the Proponent and the project team in the preparation of the SSDA. Engagement followed the DPHI's *Undertaking Engagement Guidelines for State Significant Projects*, the SEARs, and the IAP2 Public Participation Spectrum.

Based on levels of impact and/or interest, the stakeholders are categorised into two main categories, with additional sub-categories:

- Agencies and organisations:
  - Relevant local Council's;
  - Relevant agencies;
  - Service providers;
- Community stakeholders:
  - Local Aboriginal Groups;
  - Key Community and Interest Groups; and
  - Local residents and businesses.

A defined engagement area, see **Figure 19**, was established based on the site's location, the surrounding rural and residential land uses and the local road network likely to experience increased activity as a result of the development. The engagement area also highlights Luddenham Village, recognising its close proximity to the site, established residential community and the presence of local businesses, institutions, and community infrastructure. The area was confirmed to ensure that communication and engagement materials, such as newsletters and surveys, were distributed to those most likely to be affected or interested in the proposal.



**Figure 19: Community Engagement Area**

Source: Willowtree Communications, 2025

A range of consultation methods and tools were used to engage with the above-mentioned stakeholders to support early, proportionate, and fit-for-purpose engagement. Some of the engagement activities includes a community newsletter, Social Impact Assessment (SIA) and feedback survey, provision of direct emails and phone lines, meetings and briefings with stakeholders and the like and a project webpage.

The engagement tools are detailed at length within the Engagement Outcomes Report provided at **Appendix C** to address Item 3 of the SEARs.

## 6.2 Summary of Community Feedback

Over 400 newsletters were delivered, including letter box drops to the local community and emails to over 30 stakeholders. While participation in the engagement process was limited, with nine (9) survey responses and a small number of stakeholder interactions, this response is not unexpected given the community's growing familiarity with the Western Sydney Aerotropolis planning framework, extensive engagement on the planning framework in recent years and the widespread infrastructure investment program.

Many local residents and stakeholders are already aware of the long-term transformation of the area and may be experiencing engagement fatigue due to the number of concurrent planning processes and infrastructure projects underway in the region. A review of engagement activity on a range of projects in the Aerotropolis confirmed similarly low levels of community responses. Nevertheless, the feedback received, particularly through the survey and targeted meetings, provided valuable insights into local views.

Feedback received from the community during the consultation period has been considered into key themes and is summarised in **Table 13** below. It is noted that the perspective outlined below will continue to guide future stages of the project.

| Table 13: Summary of Matters Raised During Community Engagement                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Matter                                                                                                                                                                                                       | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Connection to Country</b> <ul style="list-style-type: none"> <li>Opportunity for involvement of Aboriginal Community and values</li> <li>Ongoing engagement with Aboriginal Community</li> </ul>          | <p>The Connecting with Country Framework Report includes design principles and elements of Country that have been integrated into the subdivision, including endemic vegetation, waterways, and celebration of the landscape.</p> <p>There is a commitment to ongoing engagement as planning and development progress.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Traffic and Road Safety</b> <ul style="list-style-type: none"> <li>Increased heavy vehicle traffic between the site and Western Sydney Airport</li> <li>Road degradation due to heavy vehicles</li> </ul> | <p>The SSDA incorporates traffic improvements with new access via Willmington Road and the establishment of a local street network following street hierarchy guidelines.</p> <p>Traffic and transport impacts, including heavy vehicle movements to and from the site, have been considered as part of the Transport and Traffic Impact Assessment and take into account safety requirements as well as investments to upgrade the arterial road network supporting the Western Sydney Airport and Agribusiness Precinct. The potential for road wear and degradation from heavy vehicle movements has been considered as part of the Traffic and Transport Impact Assessment.</p> <p>The assessment identifies anticipated vehicle volumes and road usage patterns and outlines mitigation measures to manage impacts on local infrastructure.</p> |



**Table 13: Summary of Matters Raised During Community Engagement**

| Matter                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Environmental Impacts</b> <ul style="list-style-type: none"> <li>Biodiversity management</li> <li>Water Cycle Management</li> <li>Opportunity for Connection to Country</li> <li>Potential risks</li> </ul>  | <p>The landscape plans integrate the approach to streetscape enhancement and opportunity associated with water management detention basins with the Connection to Country principles that include native species, increased tree canopy cover and enhanced amenity of the subdivision.</p> <p>Water cycle management will help deliver on regional stormwater system and water quality targets for the wider precinct. Soil stability and contamination risks have been considered through a range of technical assessments.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Construction Activity</b> <ul style="list-style-type: none"> <li>Concerns regarding construction activity.</li> </ul>                                                                                        | <p>Construction-related impacts such as noise, dust, traffic, and hours of operation will be managed in accordance with a detailed Construction Environmental Management Plan (CEMP). This plan will outline mitigation strategies to minimise disruption to nearby residents and businesses.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Rural Setting and Heritage Impact</b> <ul style="list-style-type: none"> <li>Retain local heritage and character</li> <li>Consider rural setting</li> <li>Noise and hours of operation</li> </ul>            | <p>A Heritage Assessment has been undertaken to identify and assess any potential impacts on Aboriginal and non-Aboriginal heritage items within and surrounding the site. This includes consultation with Registered Aboriginal Parties (RAPs) to ensure culturally appropriate engagement and identification of any places or items of significance.</p> <p>The Statement of Heritage Impact has been prepared following Heritage NSW Guidelines and in the context of the planning framework for the Agribusiness Precinct. This includes the planning investigations undertaken to consider heritage aspects of Luddenham Village in the Precinct Plan and Interim Strategy for Luddenham Village.</p> <p>Noise impacts have been assessed as part of the project's technical studies. A Noise Impact Assessment has been prepared to identify potential sources of noise during construction and recommend mitigation measures to minimise disruption to nearby residents and sensitive receivers.</p> |
| <b>Change of Character to Industrial</b> <ul style="list-style-type: none"> <li>Overdevelopment of industrial</li> <li>Impacts to the village atmosphere</li> <li>Need for local retail and services</li> </ul> | <p>The proposal has been planned to align with the strategic vision for the Western Sydney Aerotropolis and surrounding employment lands, supporting local employment and productivity through investment in the Western Sydney International Airport.</p> <p>The scale and layout of the development have been designed to manage visual and amenity impacts, using buffer zones, landscaping, and appropriate building heights to soften the interface with Luddenham Village.</p> <p>A Social Impact Assessment acknowledges the area's transition from rural to urban agribusiness and explores future scenarios for Luddenham Village. These scenarios, developed through extensive community consultation, include enhanced services and additional centres to meet the changing needs of the community.</p>                                                                                                                                                                                          |



Further reference should be made to Section 5.0 of the Stakeholder Engagement Outcomes Report included at **Appendix C** which provides a detailed overview of matters raised by community stakeholders, including how these matters have been addressed by the proposed development.

### **6.3 Engagement to be Carried Out**

The Proponent is committed to ongoing community consultation following the submission of the EIS.

In accordance with the EP&A Regulation, the Department will exhibit the EIS on the Major Projects NSW website and invite submissions from both government agencies and the public. Once the exhibition period is complete, the Department may require the Proponent to prepare a Response to Submissions Report addressing the issues raised. The Proponent will continue to liaise with the Department and stakeholders during the assessment of this SSDA to address queries that may arise.



## 7. ASSESSMENT AND MITIGATION OF IMPACTS

This section of the EIS:

- Provides an assessment of the potential environmental impacts of the proposed development in response to the matters for consideration outlined in the SEARs;
- Summarises the key findings of the detailed technical studies in the appendices, recommended mitigation, minimisation, and management measures, where required; and
- Provides detailed reasons to justify any predicted exceedances of relevant standards or performance measures.

This assessment also considers and incorporates a cumulative impact guided by the Department's Cumulative Impact Assessment Guidelines for State Significant Projects, noting the potential for concurrent construction activities in the locality as outlined in **Section 7.19.3**.

This section should be read in conjunction with the following detailed information appended to the EIS:

- SEARs Table identifies individual matters listed within the SEARs and the location where each requirement is addressed (**Appendix A**);
- Statutory Compliance Table identifies where the relevant statutory requirements have been addressed (**Appendix B**);
- Community and Engagement Outcomes Report, identifying where the issues raised by the community during engagement have been addressed (**Appendix C**); and
- Proposed Mitigation Measures for the proposal which are additional to the measures built into the physical layout and design of the project (**Appendix D**).

The detailed technical reports and drawings prepared by specialists and appended to the EIS are individually referenced within the following sections.

It is noted that the following SEARs items have been addressed elsewhere in this EIS:

- Statutory and Strategic Context – **Section 3** and **Section 5**;
- Suitability of the Site – **Section 8**; and
- Community and Stakeholder Engagement – **Section 6**.

### 7.1 Subdivision and Civil Design

This section of the EIS details the proposed subdivision and civil design works, including both temporary construction impacts and permanent changes to the site's physical characteristics, as per the Civil Design Report prepared by Orion Gorup and available at **Appendix N**.

It is noted that the Concept Plan of Subdivision is provided below as **Figure 21**.

The DCP requires the proposed development to respond to natural topography and physical characteristics of the land and minimise the need to cut and fill. Extensive excavation is required to accommodate the Sydney Water assets located in Lot 2. Additionally, for the roads to generally align with natural topography, excavation is required for pavement construction. It is proposed to use the excavated material on site and to form generally flat graded pads balancing the overall earthworks quantities. Formation of pads will reduce the extent of earthworks required by future on-lot development. If pads are not graded, excavated material will require stockpiling then transportation to the lots after public road dedication. This would result in multiple handling of material, difficulty in transporting material in public road areas, increased carbon emissions due to additional machinery movements, additional sediment and erosion due to additional stockpiling and transport.

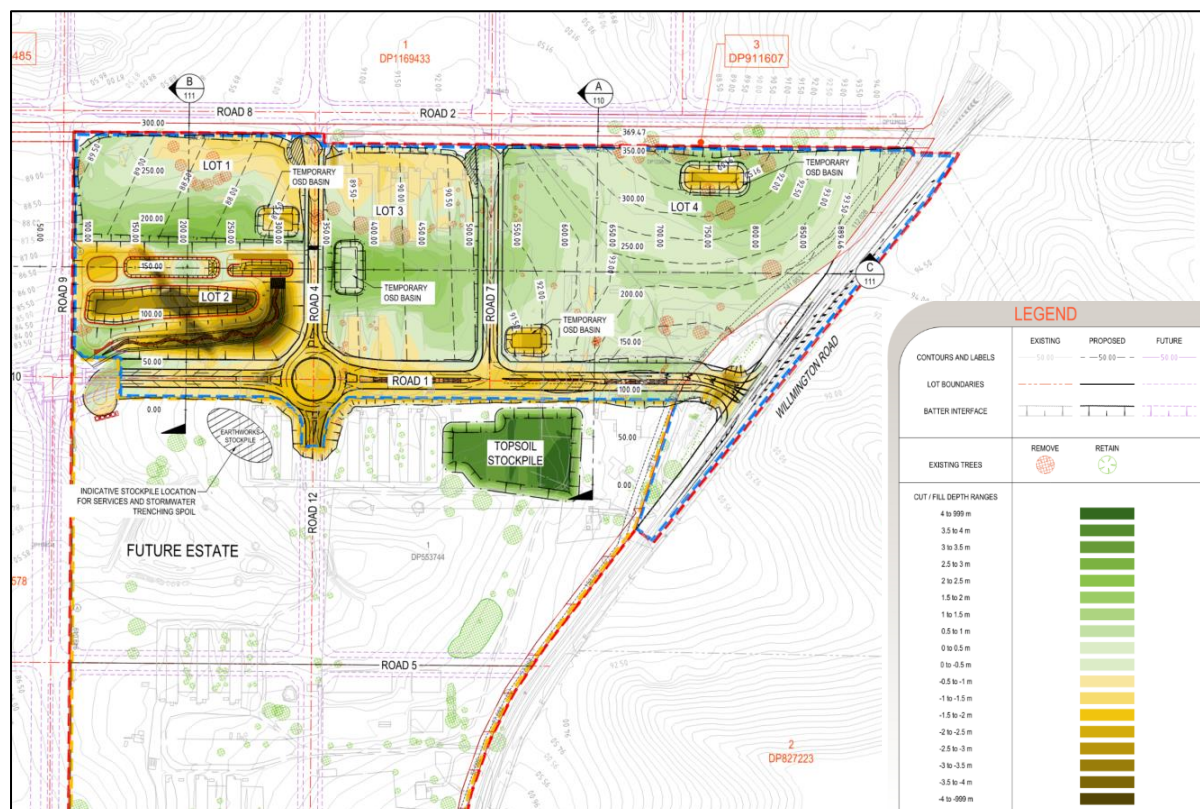




Overall, road grading is consistent with the existing topography and pad grading creates flat pads for future development consistent with existing catchments and delivering an earthworks balance. It is noted that no retaining walls are proposed.

A summary of the earthworks and topsoil is provided in **Table 14** and **Figure 20** as follows:

| Table 14. Earthworks and Topsoil Summary     |                      |
|----------------------------------------------|----------------------|
| Matter                                       | Proposed             |
| Cut                                          | 86,300m <sup>3</sup> |
| Fill                                         | 97,000m <sup>3</sup> |
| Temporary On-site Detention Basin Excavation | 10,700m <sup>3</sup> |
| Balance                                      | 0m <sup>3</sup>      |
| Topsoil Strip Volume                         | 39,550m <sup>3</sup> |
| Average Topsoil Depth                        | 0.18m                |
| Stockpile Required                           | 34,710m <sup>3</sup> |



**Figure 20. Bulk Earthworks Plan**

Source: Orion Group, 2025

Typical roads designs proposed within the site have been adopted from the DCP and are shown within the Civil Engineering Plans available at **Appendix O**. Additionally, the DCP allows for the kerbside lane in local and collector roads to accommodate parking where appropriate. Parking is offered in the kerbside lanes in all collector and local roads.

As shown above in **Figure 15**, the proposed roads include the following typologies:

- **Sub-arterial Road:** The carriageway consists of two 3.5m lanes in each direction separated by a 5.0m wide planted median which can be reduced to 1.5m wide to accommodate a turning lane. Bus stops, where required, are accommodated in the 3m wide planting zone/bus stop

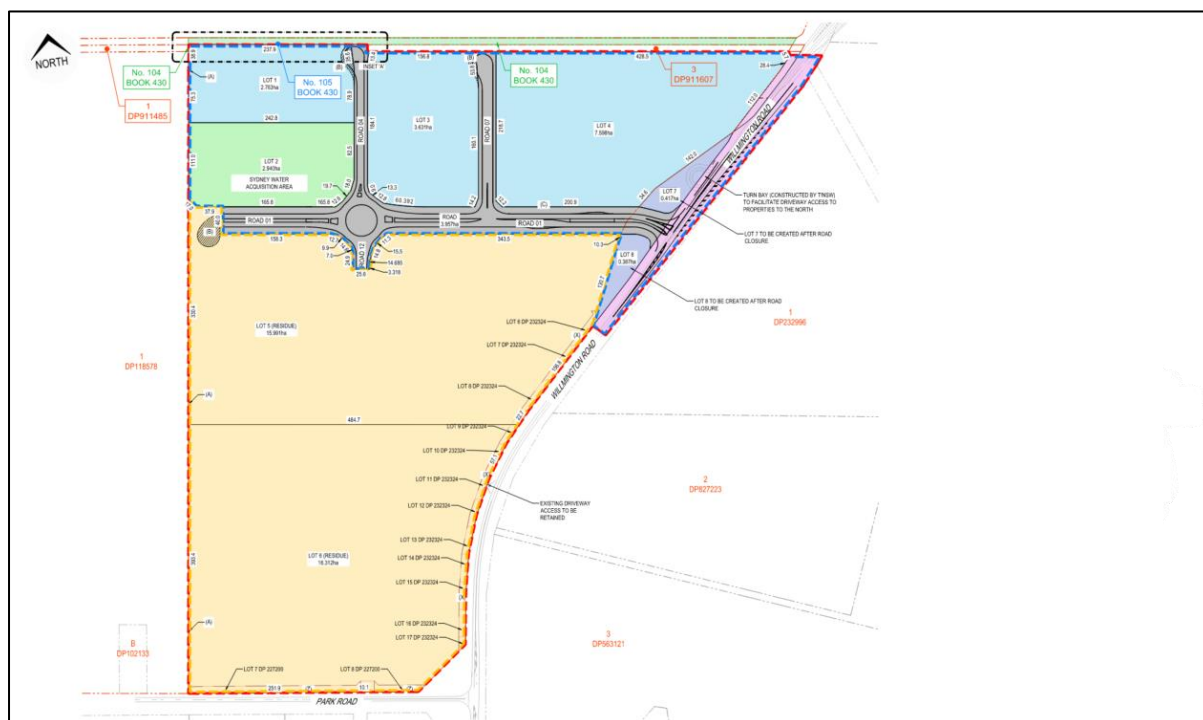
zone directly adjacent the outer travel lanes. Reverse crossfall is applied in the carriageway to direct surface runoff to the central planted median;

- **Collector Road:** The carriageway consists of a 4.2m kerb side lane and a 3.5m through lane in both directions. As permitted by the DCP it is proposed to provide kerbside parking, and any required bus stops within the kerbside lanes. Standard 3% crossfall is applied to the carriageway;
- **Local Industrial Road:** The carriageway consists of a 4m kerb side lane and a 3.5m through lane in both directions. As permitted by the DCP it is proposed to provide kerbside parking within the kerbside lanes. Standard 3% crossfall is applied to the carriageway; and
- **Open Space Edge Road:** A 3m parking lane and 3.5m through lane is provided on the side of the road adjacent open space. A 4m wide through lane only is applied in the other direction. Standard 3% crossfall is applied to the carriageway.

The proposed development seeks consent for Torrens title subdivision of the site into eight (8) lots comprising:

- Three (3) development lots (Lots 1, 3 and 4);
- One (1) lot containing the stormwater infrastructure for future acquisition by Sydney Water (Lot 2);
- Two (2) residue lots (Lot 5 and 6); and
- Two (2) lots within the Willmington Road reserve to facilitate the future road closure and land acquisition.

The Concept Plan of Subdivision is shown in **Figure 21** below.



**Figure 21. Concept Plan of Subdivision**

Source: Orion Group, 2025

### 7.1.1 Mitigation Measures

It is noted that the civil design has been directly informed by the Connecting with Country Framework as appended in **Appendix Q**. Considerations and opportunities specific to the civil design include the following:

- **Topography:** Site grading was developed with Yerrabingin consultation identifying principals of Water Country, Non-human kin Country and Move with Country. Road grading was designed to mimic existing topography where possible and maintain existing stormwater catchments. In some locations, variation to existing ground surface was required to coordinate with existing and design services and to comply with road grading requirement of Penrith City Council and Austroads. In these locations disturbance was minimised as far as reasonably practical;
- **Subdivision:** The subdivision layout is dictated by the Road Hierarchy Plan contained within the Precinct Plan. Collaboration with Yerrabingin has identified opportunities to incorporate wayfinding and arrival nodes, welcome features and communal gathering areas into the subdivision which have been addressed by the Landscape Design Report & Plans (**Appendix GG**);
- **Water:** This proposal intends to improve on the existing site condition by collecting surface runoff from within the landscape via passively irrigated street trees and vegetated swales to a pit and pipe system that conveys storms up to the 1% AEP event safely to the trunk drainage system and Sydney Water water quality/quantity control assets. The stormwater design, in conjunction with the road grading minimises disturbance to existing catchments and improves on the quality of water discharging from the site.
- **Sky:** Yerrabingin have identified the importance of identifying Sky Country within the subdivision design and making allowances for sightlines and lookout places. These have been incorporated into the landscape design by Habit8. Another consideration if Sky Country is habitat for birds and animals, however it is acknowledged wildlife management is required due to the site's proximity to the airport to minimise risk of bird strike. Planting density, locations and selection have been designed to be in accordance with the relevant planning controls to reduce encouragement of birdlife in the area, as per the Landscape Design Report & Plans (**Appendix GG**).

## 7.2 Urban Design

The following section provides a context and urban design assessment of the proposal.

The Urban Design Report at **Appendix PP** provides a comprehensive assessment of the existing and future urban context and character of the site. It sets out the requirements of the Precinct Plan, the proposed design response, including the impact of the context on the design vision and philosophy. The proposed subdivision layout is consistent with the requirements of the Aerotropolis Precinct Plan and supported by the following reports to ensure the urban design response adopts a holistic approach:

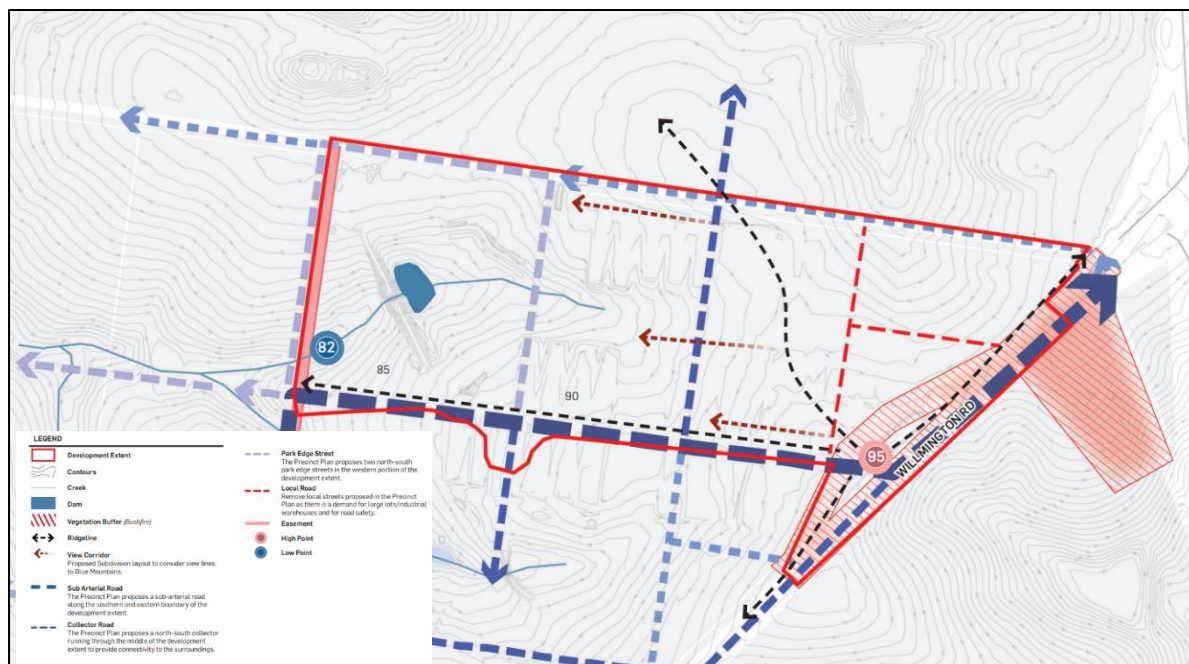
- Connecting with Country Framework (**Appendix Q**);
- Landscape Design Report & Plans (**Appendix GG**);
- Water Management Plan (**Appendix EE**); and
- Ecologically Sustainable Development Report (**Appendix W**).

### 7.2.1 Existing Environment

The Urban Design Report includes an analysis of the existing site and opportunities and challenges. The key findings are summarised below and depicted in **Figure 22**.

- The high-point of the site and ridgeline is located along Willmington Road which provides opportunities to establish east-west view corridor to the Blue Mountains;
- The existing farm dam located to the west of the site provides an opportunity to provide a consolidated stormwater infrastructure for the development extent to mitigate any flooding impacts; and
- Opportunities for future applications to provide a sensitive built form response to the interfaces with Willmington Road and the proposed public domain.





**Figure 22: Place Analysis and Key Findings Map**

Source: Urbis, 2025

## 7.2.2 Assessment of the Proposed Site Layout

A review of the key design concepts of the proposed development are summarised below:

### 7.2.2.1 Connecting with Country

The elements of Country and the outcomes and recommendation of the Connecting with Country Framework (**Appendix Q**) have then been embedded into the design development of the proposed subdivision layout and subdivision are addressed in **Section 4.3** of this EIS. This section seeks to demonstrate how Aboriginal culture and heritage is considered and incorporated holistically in the design proposal.

The reinforcement of hydrology (The Blue Line) expresses the importance of water in the landscape, and the consideration of landscape design (The Green Line) includes the provision of generous areas of softscape in the public domain areas which will facilitate and contribute to the function of the ecological corridors of the green grid. The intersection points (The Ochre Line) will be key places for interaction, learning and discovery to celebrate the Aboriginal culture and its people, where stories are shared around the landscape.

The location of the key Connecting with Country initiatives incorporated into the proposed subdivision across the site are outlined in **Figure 23**.





COMMERCIAL IN CONFIDENCE

**SONGLINES CONNECT PEOPLE AND COUNTRY**



**The Blue Line**

The Blue line songline, captures the essence of water and its importance in the landscape everything human and non-human. Water gives and sustains life and flows throughout western Sydney in small and major systems. Water dominates the site and although the dams and water swales are made for farming practices, the concept of capturing flowing water and using it to grow and sustain plant and animal life will be used in the interpretive Connection to Country ideas and opportunities for the site.



**The Green Line**

The Green line songline, highlights the local clan's connection to the natural land endemic landscape which provided food, shelter and medicine for the people. The landscape is also fundamental in helping to tell stories about the past, about culture, family and is used as a strong marker to record history, tradition and to guide.



**The Ochre Line**

The Ochre Line songline has been created by this team to tell the story about "people". A place where stories are shared around the landscape. A place for interaction, learning and discovery.

**Figure 23: Incorporation of Connecting with Country Initiatives**

Source: Habit8, 2025

### 7.2.2.2 Streets and Movement Network

The proposed road infrastructure involves construction of an internal road network in accordance with the alignment and road typologies established in the Precinct Plan and is lined with trees to increase the canopy cover on the site. It is further noted that the proposed road network complies with the street sections provided in the DCP.

The proposed east-west sub-arterial road is designed to function as the main spine road through the site and with the broader hierarchy of streets providing efficient access to all development lots, as well as providing visual connection with the Blue Mountains. Please see **Figure 24** below.

The north south collector road is designed to provide connection between the proposed southern open space and northern open space. All constructed roads will be dedicated to Council upon completion, ensuring ongoing public maintenance and access. All roads will be provided with appropriate lighting and sightlines to ensure compliance with the relevant provisions of Crime Prevention through Environmental Design.





**Figure 24: Photomontage of the Proposed Sub-Arterial Road**

Source: Habit8, 2025

### 7.3 Design Quality

This section provides a detailed assessment of the design quality of the proposed development.

#### 7.3.1 State Design Review Panel

The SDRP provided an initial advice letter dated 22 November 2024 to request further information to demonstrate how the proposal responds to the future urban context and long-term objectives of the Precinct Plan. The SDRP then provided an advice letter dated 28 March 2025 with advice and recommendations on the Concept Plan of Subdivision. The following table illustrates the responses to the queries raised by the SDRP.



| <b>Table 15: SDRP Advice Response</b>                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Matter for Consideration</b>                                                                                                                                       | <b>Assessment/Section in the EIS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Connecting with Country</b>                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Set ambitious targets for regenerating Country and increasing biodiversity.                                                                                           | Aquatic flora can also be considered within the basin lot to provide habitat for non-human kin, and link to the wider context of the chain-of ponds across the extent of Luddenham and beyond. Ephemeral planting within the basin which can thrive and provide habitat during times of inundation and drought. Planting consideration allows the site to connect at a broader biodiversity and environmental scale. Connected landscapes also has a focus on non-human kin, the vegetation planted to offer a home, respite and safety for animals. Vegetated verges with groundcovers, small shrubs and tree canopy cover. This not only shades the human users but allows for migration of our non-human kin. Prioritising endemic vegetation species to provide habitat and resources to endemic non-human kin.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Provide landscape solutions that increase the habitat for non-human kin, particularly any threatened species that could be promoted through the selection of planting | <p>While the development acknowledges the importance of supporting non-human kin as outlined in the Connecting with Country principles, the landscape approach must carefully balance ecological outcomes with aviation safety requirements and site-specific constraints.</p> <p>Movement of threatened species through the development site is unlikely and should not be encouraged through landscape solutions, given potential wildlife risk to airport operations and lack of connectivity due to major roadways and surrounding development.</p> <p>The landscape design prioritises mitigating urban heat and providing amenity while balancing wildlife risk through carefully considered design approaches vetted by project ecologists. Plant selection will focus on species that support the Connecting with Country principles - including cultural plantings that strengthen the connection between people and Country - while avoiding species that may attract large flocking birds or other wildlife that could pose aviation safety risks. The DCP requires ongoing monitoring which may need to respond to problematic wildlife attraction in future. As such, the upfront design approach aims to provide meaningful connection to Country through culturally significant plantings and design elements, and habitat creation that does not compromise aviation safety. This approach maintains the integrity of the Connecting with Country principles while responding appropriately to the site's unique constraints and operational context.</p> |
| <b>Site Strategy and Landscape</b>                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |



| <b>Table 15: SDRP Advice Response</b>                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Matter for Consideration</b>                                                                                                                                       | <b>Assessment/Section in the EIS</b>                                                                                                                                                                                                                                                                                                                                                                                        |
| Review the design of the proposed intersections to provide safe and inviting environments for pedestrians and cyclists. Intersections should demonstrate:             | Cycleways, as nominated in the DCP, are located within the road verge areas and not within carriageways and therefore do not extend continuously through intersections. Shared path crossing points are provided in standard allocations for both pedestrians and cyclists.                                                                                                                                                 |
| a. cycleways are protected through intersections                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                             |
| b. pedestrian and cycle crossings are direct and avoid circuitous routes (i.e., crossings with significant offsets/detours from the intersection)                     | Pedestrian and cycle paths are located as required by the DCP within road verge areas. Shared path crossing points are located at all intersections in standard allocations. No significant offsets or deviations are proposed.                                                                                                                                                                                             |
| c. consideration of the guidance provided in Movement and Place and Western Sydney Street Design Guidelines                                                           | Recognising the intended future use of the site for agribusiness purposes safe access paths encouraging active transport have been incorporated within the Concept Plan of Subdivision. The footpaths are lined with trees to provide shade, creating healthy streets and an ecological network. Additionally, gathering spaces and arrival nodes have been identified along the path to elevate the pedestrian experience. |
| Acknowledging their proximity to potentially high traffic areas, explore providing additional opportunities to dwell along the collector and open space roads.        | The Landscape Design Report & Plans ( <b>Appendix GG</b> ) show the potential interfaces between future development and the public domain using sections, detail plans and perspectives. The plans documents show additional seating (to relax and “dwell”) along the collector and open space roads.                                                                                                                       |
| <b>Give Further Consideration to Interfaces of the Future Development and the Public Domain</b>                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Where required, provide additional landscape setbacks to avoid steep batters between the street and the lot, avoiding the need for additional stabilisation measures. | The Landscape Design Report & Plans ( <b>Appendix GG</b> ) show the level differences, potential setbacks and landscape treatment to areas between the public domain and built form development. At this stage in the design process, there are no large walls, steep batters or stabilisation required.                                                                                                                    |
| Review the interface between the Sydney Water asset and Lot 1 so that there is a positive relationship between the public/private boundary                            | The Landscape Design Report & Plans ( <b>Appendix GG</b> ) propose a 'green' screen along the northern boundary of the storm water infrastructure. The screening will incorporate planting and trees that will assist in mitigating the visual impacts from the potential warehouse to the north. This will also act as boundary creating a softer interface to the proposed infrastructure.                                |



| <b>Table 15: SDRP Advice Response</b>                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Matter for Consideration</b>                                                                                                                                                                                                                               | <b>Assessment/Section in the EIS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Maximise the provision of canopy cover, noting the proposal does not currently meet the requirements of the precinct plan and DCP.                                                                                                                            | Canopy cover will be balanced with the goal of reducing risk of wildlife attraction, through careful selection of tree species and placement in the landscape design. Maximum, continuous canopy coverage is in direct conflict with goals under the DCP to mitigate wildlife attractiveness, which is ultimately an airport safety issue. Balance will be found through placement of larger endemic trees with lower-risk or less preferred trees in between, and ongoing monitoring and adaptive management of potential habitat including canopy, as required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Consider the proposal in relation to its future urban context - including adjacent uses and permissible built form, the nearby local centre, the arterial corridor etc. and demonstrate how the proposal might both contribute and be shaped by this setting. | The proposed development extent is located within the Agribusiness Precinct, one (1) of the six (6) initial land release precincts of the Aerotropolis that has established a strategic vision, general objectives, proposed land uses and a performance criterion for the development of land under the Precinct Plan. In terms of the future context, the Luddenham Village boundary is located to the south of the proposed development extent. The Luddenham Village Interim Strategy, which was a subject of community consultation, contemplates the extension of the Luddenham Village boundary to include a portion of the proposed development extent. Given that the Luddenham Village Plan is yet to be finalised by DPHI, Lot 5 and Lot 6 will essentially be 'super lots' in order to offer the Proponent the flexibility needed to respond to the Luddenham Village Plan when it is finalised, as well as to any changes in market conditions. For this reason, the proposed subdivision layout is located on the northern part of the proposed development extent. The land to the south of the sub-arterial road will comprise a two (2) large residue lots. The immediate land surrounding the proposed development extent is also zoned Agribusiness. Land to the further north-west of the proposed development extent (approximately 200m) is zoned Enterprise pursuant to the Western Parkland City SEPP. |
| Demonstrate the suitability of the proposal in its response to the context. Illustrate:<br>a. How the proposal is connected to wider precinct systems. E.g. the active transport network, the green/blue grid, precinct wide WSUD strategies.                 | Diagrams have been provided as part of the Urban Design Report ( <b>Appendix PP</b> ) to illustrate how the proposed subdivision will connect to the wider precinct systems.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Provide indicative built form envelopes, landscape and hardscape locations to inform the proposal and help prevent unintended outcomes.                                                                                                                       | Two (2) indicative built form envelopes demonstrate the flexibility of the proposed development extent to accommodate large warehouses. The built form is guided by design principles on access and movement, landscape and views, office component and interfaces. The office components are located at the corners and primarily along the western edge to take advantage of the views to the Blue Mountains. Supporting precedent                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |



| Table 15: SDRP Advice Response                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Matter for Consideration                                                                           | Assessment/Section in the EIS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                                                                    | images on warehouses and office components have been included as a reference. Landscape areas will be incorporated within the setbacks and the proposed car park areas will be interspersed with trees.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Demonstrate how this delivers on the intent of the precinct plan. For example, but not limited to: | The plan proposes the sub-arterial road and the park edge street are consistent with the Precinct Plan. The two (2) local roads identified on the southwestern corner of Lot 4 in the Precinct Plan are located closer to the intersection of the sub-arterial road and Willmington Road. The sub-arterial road to the south of Lot 4 is designed to accommodate heavy vehicles and public transport vehicles. The location of the local roads, as envisaged in the Precinct Plan, will impact traffic safety and create traffic hazards due to activities such as turning across traffic with the potential for obstructed views or inadequate surveillance while turning when used by heavy vehicle movements expected to frequent the proposed development extent. Further, the removal of the road minimises the grid by aligning key roads with the topography and accommodates a variety of building sizes and uses while maintaining overall flexibility for future development. |
| a. Achieving a permeable and active street network.                                                | As outlined previously, the Precinct Plan notes that 'larger block patterns are required in the Enterprise and Agribusiness Zone to accommodate larger format employment-generating and industrial uses.' The deletion of the local industrial road will provide a larger block that can accommodate a variety of building sizes and uses while maintaining overall flexibility for future development. Further, the proposed road network minimises the grid by aligning key roads with the topography and improves traffic safety. The traffic consultant has advised the intersection of the north-south facing road would be too close to the intersection of the sub-arterial roads. This design approach ensures an appropriate traffic flow, particularly for large trucks that will service the industrial area.                                                                                                                                                                |
| c. Adequately allowing for the flow of water in the landscape                                      | Landscape areas proposed for the development extent consist predominantly of road verge areas and a central swale located within the sub-arterial road. Rainfall on these locations will first infiltrate to the underlying soils with excess flows to be collected in the road pit and pipe system and conveyed to the Sydney Water treatment assets and the vegetated trunk drainage channel. Rainfall within the landscape areas of the Sydney Water asset zone will either be directly taken into the treatment assets or flow as sheet flow to the trunk drainage channel. The design of the proposed development extent has considered future road levels and anticipated future downstream connection levels to Sydney Water Infrastructure in order to facilitate orderly future development.                                                                                                                                                                                   |
| Avoiding isolating adjoining properties or impacting on their development.                         | The proposed east-west sub-arterial road and the north-south park edge street are consistent with the Precinct Plan. The proposed subdivision therefore does not compromise the orderly development of the adjoining property to the north.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |



### 7.3.2 Achievement of Design Excellence

Under Part 4.5, Clause 4.33 Western Parkland City SEPP, the, the consent authority must not grant consent to a development unless the proposed development exhibits 'design excellence'. The matters listed in clause 4.33 of the Western City Parkland SEPP and Better Placed were key assessment criteria in the selection of the winning scheme.

As such, the proposal demonstrates compliance with matters listed in Clause 4.33 Western Parkland City SEPP, as outlined in **Table 16** below.

| <b>Table 16: Consideration of Clause 4.33 - Design Excellence Requirements</b>                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Matter for Consideration</b>                                                                                                                                                     | <b>Assessment/Section in the EIS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| (a) the suitability of the land for development                                                                                                                                     | The proposed development extent currently functions as a poultry farm and has an existing dam to the west. The proposed subdivision rationalises the land allocated for Sydney Water infrastructure in order to create an orderly subdivision layout for the future built form. A Water Management Plan has been prepared Orion Group ( <b>Appendix EE</b> ) to demonstrate on-site detention, road and trunk drainage that will handle the water flow. The proposed development extent also demonstrates the flexibility to incorporate large warehouses. |
| (b) the existing and proposed uses and use mix                                                                                                                                      | The land is zoned Agribusiness; therefore the proposed subdivision and future uses will be aligned with the zoning. Additionally, recent proposals for developments in the surroundings have a similar condition.                                                                                                                                                                                                                                                                                                                                          |
| (c) Aboriginal heritage                                                                                                                                                             | A Connecting with Country process has been undertaken by Yerrabingin to engage and consult with the community. The outcomes and design principles have been embedded within the design of the Concept Plan of Subdivision with takes a landscape-led approach.                                                                                                                                                                                                                                                                                             |
| (d) the relationship of the development with other buildings (existing or proposed) on the same site or neighbouring sites in terms of separation, setbacks, amenity and urban form | The Concept Plan of Subdivision is aligned with the Precinct Plan and encourages connectivity to the surroundings. Additionally, the future built form as illustrated on pages 58 and 59 of the Urban Design Report ( <b>Appendix PP</b> ) are consistent with the emerging character of Luddenham.                                                                                                                                                                                                                                                        |
| (e) the bulk, massing and modulation of buildings                                                                                                                                   | The indicative built form of large warehouses, represented in this report is consistent with the typology that has a growing demand in the region. The interface to Willmington Road will create visual interest through the use of colours and materiality.                                                                                                                                                                                                                                                                                               |
| (f) street frontage heights                                                                                                                                                         | The office components of the future warehouses will be designed to respond to the human-scale.                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| (g) environmental performance and amenity standards, such as sustainable design, overshadowing and solar access, visual and acoustic privacy, noise, wind and reflectivity          | The future built form will be designed to minimise amenity impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |



**Table 16: Consideration of Clause 4.33 - Design Excellence Requirements**

| Matter for Consideration                                                                                                            | Assessment/Section in the EIS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (h) the achievement of the principles of ecologically sustainable development                                                       | The development will integrate ESD principles for sustainability and community benefit. It will adopt a precautionary approach to climate resilience and flood risk, with responsive engineering and design. The development will prioritise intergenerational equity, enhancing public amenities and infrastructure resilience. Biodiversity conservation is ensured through environmental assessments and green corridors. Resource use will be managed to reduce the ecological footprint, guided by lifecycle cost analyses. This approach aligns with SEARs requirements and the legislative framework. |
| (i) pedestrian, cycle, vehicular and service access and circulation requirements, including the permeability of pedestrian networks | The road network of the proposed subdivision is consistent with the intent of the Precinct Plan. The proposed road network within the site increases permeability whilst having regard to pedestrian and vehicular safety for large vehicles. Additionally, footpaths have been incorporated along all roads to promote and enhance pedestrian walkability.                                                                                                                                                                                                                                                  |
| (j) the impact on, and proposed improvements to, the public domain                                                                  | The Concept Plan of Subdivision is a landscape-led plan that improves the existing conditions through the provision of continuous tree canopies, swales and planting. The proposed basin in the southwest quadrant will also contribute.                                                                                                                                                                                                                                                                                                                                                                     |
| (k) the impact on special character areas                                                                                           | N/A - Future detailed developments will include built form.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| (l) achieving appropriate interfaces at ground level between the building and the public domain                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| (m) architectural diversity where the development is to consist of more than 2 buildings                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

## 7.4 Trees

### 7.4.1 Existing Environment

The existing landscape character of the site largely comprises of some scattered areas of trees and vegetation with multiple farm dams on site.

An Arboricultural Impact Assessment (**Appendix H**) evaluates the impacts of the proposed works on all significant trees located within the project area. A total of 330 individual trees and four (4) tree groups within the project area have been identified and assessed. It must be noted that the Arboricultural Impact Assessment does not account for trees outside of the site.

### 7.4.2 Potential Impacts

The proposal seeks to retain 236 trees and three (3) groups (identified as Groups 1-3) which will be protected in accordance with the relevant Australian Standards, as elaborated in the Arboricultural Impact Assessment. To be specific, these trees are able to be retained as they will not be significantly impacted by the development works. Notwithstanding the current proposal, it is acknowledged that





the 236 trees identified for retention will likely be subject to future removal, contingent upon the lodgement and approval of subsequent development applications at the site.

The proposal requires the removal of 97 trees and one (1) group of trees (identified as Group 4) to facilitate the proposed works, including site grading, new surfacing and/or due to proximity to proposed structures. Of these, 39 individual trees and one (1) group are of poor condition.

Of note, Group 5, comprising eucalyptus, will be subject to selective removal of individual trees, with the proposed bulk earthworks and road extending through the centre of the group. Up to 43 individual trees within the group will be required to be removed. The remaining 108 trees can be retained with no encroachment.

The proposal has a significant landscaping strategy with a significant tree replacement ratio along the proposed road network and stormwater infrastructure which will mitigate the proposed tree removal.

#### **7.4.3 Mitigation Measures**

All tree protection requirements provided in Section 10 of the Arboricultural Impact Assessment must be implemented during construction works.

#### **7.5 Landscaping and Tree Canopy**

The proposal delivers a landscape-led design that reflects elements of Country while responding to the natural and built hazards and considerations affecting the site, including water management, flood affectation, bushfire protection, and aviation safeguarding.

As described in **Section 4.5**, the proposed landscape design incorporates several strategic components that collectively achieve our integrated design vision:

- **Landscape-Led, Country-Centred Design Approach:** Prioritising elements that honour and reflect the indigenous landscape character and cultural significance of the site. Ambition for a landscape-led proposal with a strong Country narrative;
- **Integrated Water Management:** Integration of landscape and water management systems designed to meet the relevant water quality and quantity targets whilst providing quality public space for future employees and visitors;
- **Establishment of Canopy Trees:** Significantly increasing the plant density on site whilst also meeting the relevant requirements relating to wildlife hazard reduction to safeguard operations of the Western Sydney Airport. This will enhance the quality outdoor amenity and provide high-quality public domain while contributing to the biodiversity on the site; and
- **Sustainable Transport Infrastructure:** Incorporating shade tree canopies and rest areas throughout the development to encourage and support sustainable transportation choices.

The landscaping objectives and vision are further detailed in the Landscape Design Report & Plans provided at **Appendix GG**.

The site is located within the 3km wildlife buffer zone and the DCP requires no more than 5 trees in one (1) group (defined as trees with touching canopies), with a minimum gap of 100m between canopies/groups. The proposed tree planting and canopy arrangement aligns with the ecologist's recommendations, which specify that street tree species and tree planting should be spaced at appropriate intervals to ensure canopy cover is not continuous, thereby mitigating wildlife attraction. This requirement conflicts with the minimum 40% canopy coverage requirements stipulated in the Precinct Plan. Consequently, the proposed landscape design balances compliance with airport safeguarding principles against wildlife hazards while addressing bushfire management considerations to ensure the safe operation of a 24/7 airport.

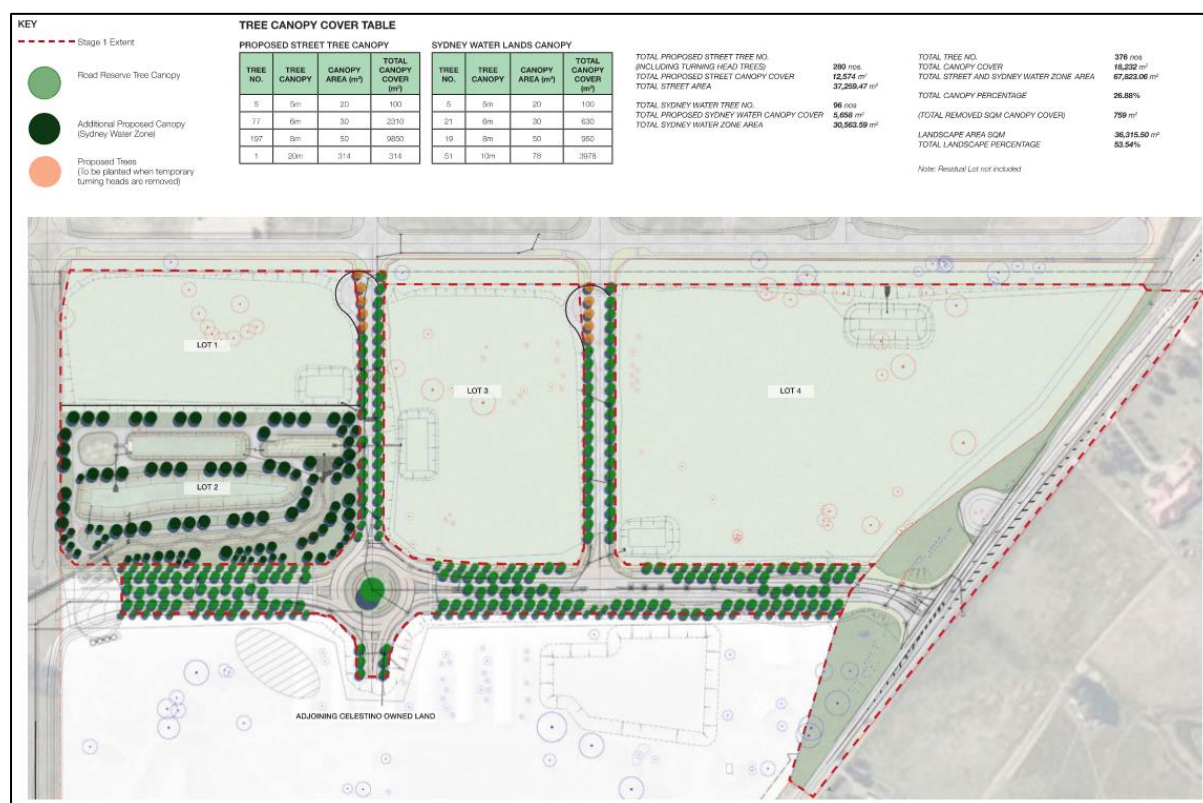


As demonstrated in **Figure 25**, the proposed road network within the site contributes to the canopy cover of 26.88% and significantly exceeds the current cover on the site. The provision of 376 new trees on site provides of 280 on the proposed road network and 96 on the Lot 2 (Stormwater Infrastructure Lot).

It is noted that the design results in a total landscaped area of 53.54% of the of the Road Reserves and Sydney Water acquisition land.

The proposed canopy targets while non-compliant with the Precinct Plan and DCP requirements balances the competing requirements of aviation safety (wildlife hazard mitigation and bushfire management considerations) to ensure the operational requirements of the 24/7 Western Sydney Airport. As confirmed in the Wildlife Hazard Assessment at **Appendix RR**, the proposed landscape species will be carefully selected so as to management wildlife attraction risk to the site.

Therefore, the proposed landscape design represents a substantial improvement to the site and surrounding locality through a visually and physically integrated design that activates the streetscape and provides tangible public benefits.



**Figure 25: Proposed Tree Canopy Coverage**

Source: Habit8, 2025

## 7.6 Soils

A Geotechnical Investigation has been prepared by Geotechnique and is included at **Appendix AA**.

This report assesses the subsurface conditions and groundwater regime across the site. The geotechnical investigation comprised drilling 28 boreholes. The findings from the field work and laboratory testing established existing ground and water conditions at the site and subsequently provided recommendations which consider the potential impacts on soil resources and riparian areas on and near the site.

### **7.6.1 Existing Environment**

The site comprises the following soil and rock layers:

- A thin layer of topsoil (silty clay) extending to approximately 0.1-0.2m depth;
- Residual clay soils extending to 1.6-2.0m depth below ground level; and
- Sandstone bedrock (Bringelly Shale) from approximately 1.6-2.0m depth.

Groundwater was encountered at depths between 2.94m and 4.87m below ground.

### **7.6.2 Potential Impacts**

Bulk earthworks up to 6m in depth will be required to facilitate the proposed development, including creation of development pads, road infrastructure, and stormwater management facilities. The earthworks specifically involve cut and fill operations, with cuts anticipated to be limited in residual soil and very low to medium strength sandstone. The Geotechnical Investigation recommends that cut and fill slopes are to be battered for stability or retained by engineered retaining structures.

A high-level earthwork volume estimate assessment has been completed for the site which is provided in **Table 14** above and detailed on the Civil Engineering Plans proposed in **Appendix O**.

It is noted that the excavations extending below groundwater level may encounter groundwater inflow. However, excavations deeper than 2.9m will be limited within the footprints of trunk drainage channel and bio-retention basins. Therefore, most excavations are likely to encounter only minor groundwater inflow, which could be managed by a conventional sump and pump method. However, if significant groundwater inflow is encountered, it is recommended that groundwater modelling is undertaken to design a dewatering system.

#### **7.6.2.1 Soil Erodibility**

In terms of soil erodibility, the soils likely to be disturbed or excavated are considered reactive and dispersive, making them susceptible to excessive erosion when exposed during construction. The site's soil characteristics present moderate to high erosion potential, particularly given:

- The highly plastic nature of the residual clay soils when exposed;
- The dispersive characteristics identified in the geotechnical investigations, particularly within the local soil landscape which is susceptible to high erosion hazards;
- The proposed extent of earthworks, including cuts up to 6m depth; and
- The site's topography with slopes towards drainage depressions.

The Geotechnical Investigation recommends that the earthworks for the proposed development should be carried out with an appropriate Sediment Erosion Control Plan (SECP) to manage the impacts from the erodible soils. Orion Consulting have prepared an SECP for the proposed earthworks, see the Civil Engineering Plans at **Appendix O**.

#### **7.6.2.2 Soil Salinity**

The site has moderate salinity potential across most areas, with higher salinity risk along the drainage lines and creek areas. It has been found that the soils likely to be disturbed or excavated during bulk earthworks should be considered saline and earthworks for the proposed subdivision should be carried out in accordance with a Saline Soil Management Plan (SSMP) to manage impact from saline soils on the proposed development and vice versa. An SSMP is available within the Geotechnical Investigation found in **Appendix AA**.

### **7.6.2.3 Acid Sulfate Soils**

No acid sulfate soils are present on the site or within the surrounding area. Based on the geological setting and soil landscape characteristics, the risk of encountering acid sulfate soils during the proposed development is considered negligible, and on this basis an Acid Sulfate Soil Management Plan is not warranted.

### **7.6.3 Mitigation Measures**

In order to ensure that the proposed earthworks would not result in any adverse impacts relating to soil resources and riparian area, the following documentation has been prepared which would be implemented for the purpose of erosion and salinity control:

- Sediment Erosion Control Plan (**Appendix O**); and
- Saline Soil Management Plan (**Appendix AA**)

Additionally, provisional mitigation and directions for further investigation were proposed throughout the Geotechnical Investigation. Summarised in list form below are the key control measures to be implemented during construction. Subject to the implementation of these recommended measures, the geotechnical conditions at the site would not result in adverse impacts on soil resources and would be suitable for the proposed development.

- Sediment control devices: Install sediment fences, hay bales, and sediment basins prior to commencement of earthworks to capture and treat sediment-laden runoff;
- Surface water diversion: Divert clean water from undisturbed areas away from work zones using temporary drainage channels and flow diverters;
- Progressive stabilisation: Rapidly stabilise exposed surfaces through temporary covering, hydro-seeding, or mulching, particularly given the high erosion potential of the Luddenham soil landscape;
- Dust suppression: Implement water spraying or soil binding agents during dry conditions to prevent wind erosion and dust generation from exposed clay soils;
- Construction access controls: Install shaker grids and wheel wash facilities at site exits to prevent tracking of sediment onto public roads;
- Weather monitoring: Avoid excavation and earthworks during high rainfall events where practicable, with additional controls implemented when rain is forecast;
- Stockpile management: Locate soil stockpiles away from drainage lines and install perimeter sediment controls, with stockpiles covered during inactive periods; and
- Regular inspections: Undertake daily inspections of erosion and sediment controls, with immediate maintenance or replacement of damaged controls following rainfall events.

## **7.7 Agricultural Land**

A Land Use Conflict Risk Assessment (LUCRA) prepared in accordance with the Department of Primary Industry (DPI) *Land Use Conflict Risk Assessment Guide*, and a Biosecurity Risk Management Report (BRMP) has been prepared in accordance with the DPI's *Managing biosecurity risks in land use planning and development guide*. Both reports have been prepared by SLR and are found in **Appendix FF** and **Appendix L** respectively.

### **7.7.1 Land Use Conflict**

#### **7.7.1.1 Potential Impacts**

The LUCRA identifies and evaluates potential land use conflicts between the proposed development and neighbouring agricultural land uses.



**Table 17** represents the consideration project, identification of potential conflict, risk ranking prior to implementation and the revised risk ranking after mitigation measures of the proposed development have been implemented.

It is noted that risk level is based on the following ratings: Very High (19-25), High (13-18), Moderate (8-12), Low (3-7) and Negligible (1-2).

| <b>Table 17. Construction Phase - Agricultural Land Use Conflict Risks</b>                                                                                                                  |                     |                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|---------------------|
| <b>Risk Category</b>                                                                                                                                                                        | <b>Initial Risk</b> | <b>Revised Risk</b> |
| <b>Weed and Pest Management</b>                                                                                                                                                             |                     |                     |
| Increased distribution of weeds during construction as a result of increased vehicle and pedestrian movements.                                                                              | 8                   | 5                   |
| Increased presence of pest animals during construction as a result of increased food waste.                                                                                                 | 8                   | 5                   |
| <b>Agricultural Land and Productivity</b>                                                                                                                                                   |                     |                     |
| Removal of agricultural land from production                                                                                                                                                | 10                  | 1                   |
| Reduced agricultural productivity of land surrounding the project site                                                                                                                      | 13                  | 9                   |
| <b>Noise</b>                                                                                                                                                                                |                     |                     |
| Construction noise and associated impacts on residents                                                                                                                                      | 8                   | 9                   |
| Construction noise and associated impacts on livestock                                                                                                                                      | 8                   | 8                   |
| Noise from increased vehicle movements on local roads during construction and associated impacts on residents and livestock                                                                 | 7                   | 2                   |
| <b>Air Quality</b>                                                                                                                                                                          |                     |                     |
| Dust from vehicle movements along unsealed local roads and other construction activities                                                                                                    | 13                  | 8                   |
| <b>Security</b>                                                                                                                                                                             |                     |                     |
| Change in land use resulting in increased pedestrian and vehicle traffic on-site during the project's construction period and potential for theft and vandalism at neighbouring properties. | 8                   | 9                   |
| <b>Safety</b>                                                                                                                                                                               |                     |                     |
| Safety of children and cyclists due to increased vehicle movements along the local road network                                                                                             | 14                  | 9                   |
| Safety of flora and fauna due to increased vehicle movements along the local road network                                                                                                   | 14                  | 9                   |
| <b>Property Values and Council Rates</b>                                                                                                                                                    |                     |                     |
| Devaluation of neighbouring properties due to proximity to project infrastructure                                                                                                           | 14                  | 9                   |
| <b>Health</b>                                                                                                                                                                               |                     |                     |
| Potential health impacts due to proximity to project infrastructure                                                                                                                         | 8                   | 8                   |
| <b>Traffic</b>                                                                                                                                                                              |                     |                     |
| Increased vehicle movements along the local road network during construction and subsequent impacts on accessibility and commute times.                                                     | 12                  | 8                   |
| Impacts on campaign-based agricultural transport activities during construction (e.g., livestock or product cartage).                                                                       | 8                   | 5                   |



|                                                                                                                          |   |   |
|--------------------------------------------------------------------------------------------------------------------------|---|---|
| Impact of vehicle movements on school bus route accessibility and commute times.                                         | 8 | 8 |
| Potential conflicts between project-related construction vehicle movements and agricultural stock movements.             | 8 | 5 |
| Soil Erosion                                                                                                             |   |   |
| Soil erosion leading to land and water pollution                                                                         | 8 | 5 |
| Water                                                                                                                    |   |   |
| Change to surface water flows and water quality as a result of construction and operations of the project                | 8 | 8 |
| Inadequate availability of sufficient water for neighbouring properties during construction and operation of the project | 5 | 5 |
| Local Infrastructure and Services                                                                                        |   |   |
| Inadequate availability of waste management facilities within the local community during construction of the project     | 8 | 5 |
| Fire                                                                                                                     |   |   |
| Impacts on land surrounding the project from fires generated from within the development footprint.                      | 9 | 9 |
| Impacts on the operation of the facility from bushfires in the immediate vicinity of the project.                        | 9 | 9 |

As per the table above, the LUCRA initially assessed each potential agricultural land use conflict to determine its inherent risk level based on likelihood and consequence. Following the identification of appropriate management strategies and mitigation measures, a revised risk assessment was undertaken to determine the residual risk after controls are implemented. This approach demonstrates how the implementation of targeted management measures can effectively reduce risks from initial ratings (some moderate to high) to acceptable levels (typically low to moderate).

#### 7.7.1.2 Mitigation Measures

Key management strategies have been identified to mitigate potential impacts on surrounding agricultural operations and are available within Section 3.2 of the LUCRA.

The following measures include those that achieved a revised risk of moderate or low, from a previous high risk rating:

- Standard maintenance procedures to address dust and spray drift impacts reduced risks from high to moderate;
- Application of dust suppression strategies, rapid stabilisation of disturbed areas, air quality monitoring, and assessment found in the AQIA (see **Section 7.20**), reduced risks from high to moderate;
- Construction CTMP reduced risks from high to moderate;
- Speed limits within development footprint and temporary travel speed reductions on local roads reduced risks from high to moderate;
- Project refinement to reduce impacts to neighbouring properties and recognition of temporary construction nature reduced risks from high to moderate; and
- Dedicated access points reduced traffic impacts on the local road network during construction from high to moderate.

Overall, the construction and operation of the proposed development will not prohibit existing agricultural land uses on the surrounding lands other than the loss of a small area for the road itself. The direct impact to local agricultural land and production is therefore considered acceptable.





**7.7.2 Biosecurity****7.7.2.1 Potential Impacts**

Overall, the BRMP outlines the likely risks to plants, animals, and the community, and provide relevant mitigation measures. Key construction phase risks identified include:

Weed Spreading or Introduction

- Disturbing soil can promote the spread of invasive weeds;
- Machinery, vehicles, and personnel can introduce weed seeds from other sites, especially if equipment is not cleaned properly; and
- Weeds can degrade native vegetation, impact agriculture, and increase ongoing land management costs.

Soil-borne Pests and Diseases

- Phytophthora root rot is a major risk in disturbed areas, affecting native vegetation and agricultural crops; and
- Due to the previous land uses (poultry farm) it is likely that some cross contamination through soil could occur.

Pest Animal Displacement and Attraction

- Clearing land can disturb and displace pest species like feral rabbits, foxes, and deer, which could migrate into nearby properties; and
- Exposed land may attract pest birds or rodents.

Water Contamination & Erosion

- Clearing increases soil erosion, which can lead to the spread of pathogens into local waterways, affecting agriculture and aquatic ecosystems;
- Sediment movement can smother native vegetation and degrade water quality;
- Residual poultry waste, chemicals, pathogens, or sediments could enter nearby water bodies; and
- Contamination of dam quality due to construction and sediment runoff during decommissioning.

Spread of Noxious Plants & Fire Risks

- Land clearing may encourage fast-growing, flammable weeds, increasing bushfire risk in summer.

A risk matrix has been implemented under Section 4.5 of the BRMP, thus informing **Table 18** which highlights the risk rating, consequence and potential impacts which could occur if a biosecurity threat is not managed and mitigated during the construction of the proposed development.

It is noted that risk level is based on the following ratings

- **Very High, High:** Immediate action required
- **Moderate:** Manage consistently with best practices
- **Low, Negligible:** Monitor and reassess if conditions change

**Table 18: Biosecurity Risk Assessment Summary**

| Risk Category                           | Risk Rating |
|-----------------------------------------|-------------|
| Weed Spreading or Introduction          | Moderate    |
| Soil-borne Pests and Diseases           | Low         |
| Pest Animal Displacement and Attraction | Low         |
| Water Contamination & Erosion           | High        |



**Table 18: Biosecurity Risk Assessment Summary**

| Risk Category                         | Risk Rating |
|---------------------------------------|-------------|
| Spread of Noxious Plants & Fire Risks | High        |

It must be noted that these are the overall risk levels after consideration of mitigation measures. Water contamination and fire risks remain at high levels due to the site's susceptibility to bushfire risk and previous land use for poultry farming, requiring ongoing management attention throughout construction.

#### 7.7.2.2 Mitigation Measures

Key mitigation measures in relation to biosecurity risk of the proposed development during construction have been identified and are summarised as follows:

- Adherence to Weed Eradication Management Plan (WEMP) prepared by Eco Logical Australia (**Appendix RR**);
- Identify, map and monitor existing weeds on site and in surrounding areas as well as work with local weed management professionals to apply best-practice removal and control methods;
- Conduct pre-construction soil sampling, implement vehicle wash-down stations, limit unnecessary soil disturbance and transport, source fill material from accredited supplies;
- Adherence to Fill Management Plan prepared by JBS&G (**Appendix Y**);
- Monitor for pest species and native wildlife;
- Waste management and exclusionary fencing for pest control;
- Adherence to Waste Management Plan prepared by SLR and Wildlife Hazard Management Plan prepared by Eco Logical Australia and (**Appendix QQ & Appendix TT**);
- Implementation of erosion and sediment control measures, stormwater management, and water quality monitoring; and
- Implement weed management, regular site maintenance, and firebreaks to help minimise fire risks and control invasive plant species.

In regard to biosecurity risk during the operation of the site and once the proposed development is completed, there are simple and effective measures to avoid potential risks associated with members of the public entering adjoining or nearby farmland should be implemented and this would include the following.

- In consultation with neighbouring farms display clear, simple and highly visible signs along the perimeter boundaries / fences to support adjoining farms biosecurity messages; and
- Provide educational material to new owners of the created allotments of the subdivision. The material would advise owners of the biosecurity risks and measures to minimise any impacts should they inadvertently enter adjoining farmland.

### 7.8 Traffic and Transport

A Transport Impact Assessment at **Appendix OO** has been prepared to provide a quantitative transport impact assessment in accordance with the Transport for NSW Guide to Transport Impact Assessment (GTIA) and Austroads guidelines, and includes but is not limited to:

- An estimate of trip generation, mode split, arrival/departure profiles and trip distribution for potential future land uses;
- An assessment of cumulative traffic impact on road performance and safety implications at key intersections;
- An assessment of potential impacts on the Outer Sydney Orbital corridor;
- Details of how the proposed development connects to adjoining sites to facilitate their future development for their intended purposes;



- Plans demonstrating how construction traffic can be accommodated on the site to avoid queuing in the street network;
- Details and plans of any proposed internal road network and access points, and, if necessary, details of road upgrades, traffic control measures, new roads or access points required;
- A draft CTMP detailing the likely traffic and parking impacts and mitigation measures; and
- Detailed swept paths, which are available at **Appendix OO**

The above matters are addressed within the ensuing sections.

### 7.8.1 Operational Traffic

#### 7.8.1.1 Existing Environment

The road network surrounding the site includes a mix of state and regional roads. Key roads serving the site are detailed in **Table 19** below.

| Table 19. Key Roads Serving the Site |                      |                      |                                 |                                                         |
|--------------------------------------|----------------------|----------------------|---------------------------------|---------------------------------------------------------|
| Road Name                            | TfNSW Classification | Posted Speed (km/hr) | On-Street Parking Opportunities | Traffic Lane                                            |
| Park Road                            | State Road           | 60                   | No                              | Provides for one (1) lane of traffic in each direction. |
| Northern Road                        | State Road           | 80                   | No                              | Provides for one (1) lane of traffic in each direction. |
| Willmington Road                     | State Road           | 80                   | No                              | Provides for one (1) lane of traffic in each direction. |

Traffic surveys undertaken by JMT Consulting in 2023 indicate that Willmington Road adjacent to the site carries approximately 6,500 vehicles per day, with approximately 500 vehicles during the busiest hour on any given weekday. The posted speed limit on Willmington Road is 80km/h, with observed average speeds of approximately 60km/h, notably lower than the specified limit.

A SIDRA analysis of the existing operational performances of the Park Road and Willmington Road intersection has been undertaken, and the results indicating the intersection currently operates at a strong level of service in both the morning and afternoon peak hours with spare levels of capacity. **Table 20** below summarises the results, which can be found in the Transport Impact Assessment available in **Appendix OO**

| Table 20. Existing Operational Performance |                          |                      |                           |
|--------------------------------------------|--------------------------|----------------------|---------------------------|
| Time Period                                | Intersection Performance |                      |                           |
|                                            | Level of Service         | Degree of Saturation | Delay(s) - Worst Movement |
| Am Peak Hour                               | A                        | 0.20                 | 9                         |
| PM Peak Hour                               | A                        | 0.23                 | 10                        |

#### 7.8.1.2 Public Transport Accessibility & Planned Upgrades

Given the site's rural context, public transport services are currently limited, however this will improve as the area develops and experiences urbanisation. The nearest bus service (789) connects Luddenham Village to Penrith Station, with the closest stop located approximately 1.5km from the site, being an approximate 15-minute walk. The most accessible railway stations to the site are Penrith and Kingswood Stations, both located approximately 20km northwest.



Notwithstanding the above, significant improvements to public transport and major road infrastructure are planned within the Western Sydney Aerotropolis and its surrounds. Among the most significant public transport upgrades relevant to the site are enhancements to both the Sydney Metro network and the Western Sydney Rapid Bus Service.

To be specific, the Sydney Metro – Western Sydney Airport project is set to become the primary transport spine for Greater Western Sydney and will support efficient access to the future Nancy Bird Walton Airport. The project will provide 23km of new railway combined with six (6) new metro stations at:

- St Marys, interchanging with the existing suburban railway station and connecting customers with the rest of Sydney's rail system;
- Orchard Hills, to service a future commercial and mixed-use precinct;
- Luddenham, to service a future education, innovation and commercial precinct;
- Two (2) stations within the Western Sydney Airport site:
  - Airport Business Park station; and
  - Airport Terminal station
- Bradfield, located east of Badgerys Creek Road and to service the new Aerotropolis Core, earmarked as the new central business district of the Aerotropolis.

The new railway link will connect the existing train line from St Marys Station to the Western Sydney Airport and Aerotropolis Station (Bradfield) south of the site.

Additionally, TfNSW is planning new bus services to connect local communities to the Western Sydney Airport and the Aerotropolis Core, ahead of the Airport opening in 2026. Services are proposed to run every 30 minutes between 5am and 10pm daily. These new bus services may also directly service the Agribusiness Precinct including the site.

In terms of road infrastructure, the Precinct Plan includes provision for a sub-arterial road running through the site. Furthermore, the road network in the broader precinct is subject to significant future changes associated with the Western Sydney Airport as a part of the Western Sydney Infrastructure Plan:

- The Northern Road upgrade: Widening to a four-lane divided carriageway between Narellan and Penrith;
- Elizabeth Drive upgrade: Major widening and realignment to support airport-related traffic;
- M12 Motorway: New east-west motorway approximately 5km north of the site, connecting the M7 Motorway with the Western Sydney Airport; and
- Outer Sydney Orbital: Future north-south corridor with potential alignment west of the site.

Of note, the Agribusiness Precinct, which comprises the site, is on the western edge of the Aerotropolis and is framed by the proposed Outer Sydney Orbital. The Outer Sydney Orbital corridor will service development within the Aerotropolis and beyond by providing a major transport link between Sydney's north-west and south-west, connecting with the new airport, the Agribusiness Precinct and future employment areas.

### **7.8.1.3 Potential Impacts**

For the purposes of calculating the level of traffic generated from the site, including an estimate of trip generation, mode split, arrival and departure profiles, and trip distribution for potential future land uses, the benchmarking method has been adopted.

The TfNSW Guide to Transport Impact Assessment (GTIA) document notes that for warehouse/logistics uses the typical rate of traffic generation is as follows:



- AM peak hour: 0.26 vehicles / 100m<sup>2</sup> GFA;
- PM peak hour: 0.23 vehicles / 100m<sup>2</sup> GFA; and
- Daily: 2.83 vehicles / 100m<sup>2</sup> GFA.

The proposed development involves the subdivision of the site to create three (3) development lots with a combined site area of 15.385 hectares. An average Floor Space Ratio (FSR) for the development lots of 0.5:1 has been adopted which is consistent with the FSR assumed in the Section 7.12 contributions plan for the Agribusiness Precinct, which was based on benchmarking of other similar developments.

This results in a total GFA of 76,925m<sup>2</sup>. Adoption of the recommended traffic generation rates noted in the GTIA to this quantum of floor space would result in the following traffic movements:

Peak Hour Traffic:

- AM Peak: 200 vehicle movements:
  - Light vehicles – 72% arrivals, 28% departures;
  - Heavy vehicles – 52% arrivals, 48% departures;
- PM Peak: 177 vehicle movements:
  - Light vehicles – 25% arrivals, 75% departures; and
  - Heavy vehicles – 50% arrivals, 50% departures.

Daily Traffic:

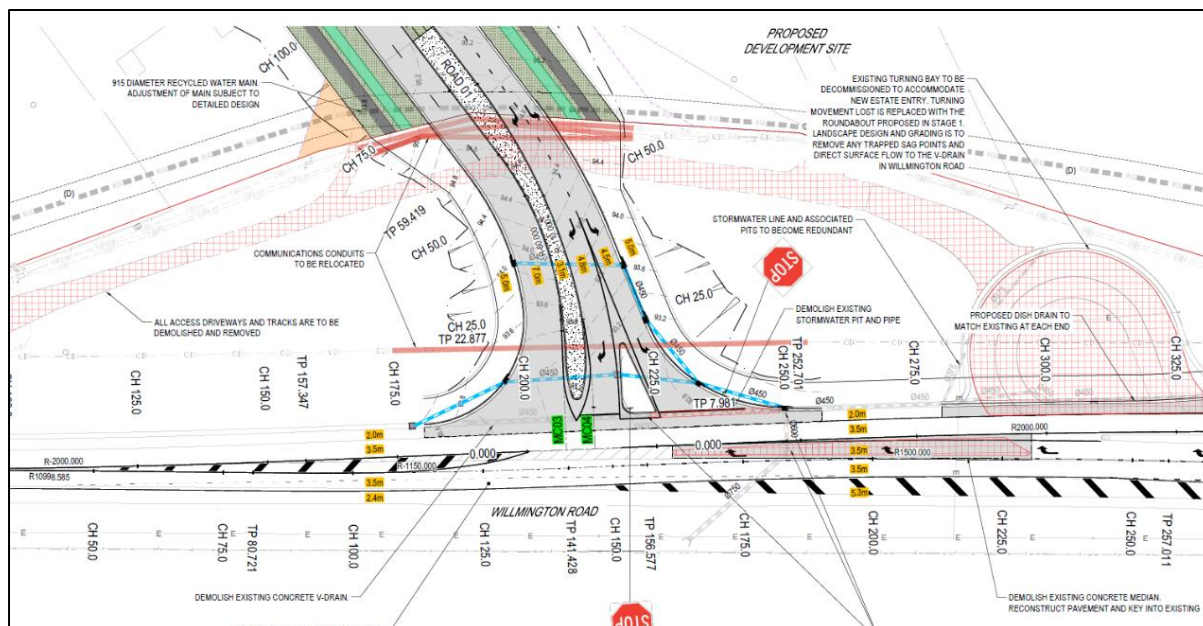
- Total: 2,183 vehicle movements;
- Heavy vehicles: 515 movements (24% of total); and
- Peak generation: 216 vehicles/hour at 2:00 PM.

#### **7.8.1.4 Intersection Configuration**

The primary access point to the site will be facilitated via a new interim T-intersection at Willmington Road, designed to operate as a 'priority control' intersection with provision for future signalisation. It is noted that the proposed development makes suitable provision in terms of land allowance for the delivery of an upgraded intersection at a later date, being when other development triggers the relevant traffic signal warrants. The interim layout as proposed will be suitable to accommodate traffic flows during the busiest hours of the day.

The layout of the interim intersection along Willmington Road is visualised in **Figure 26** below.





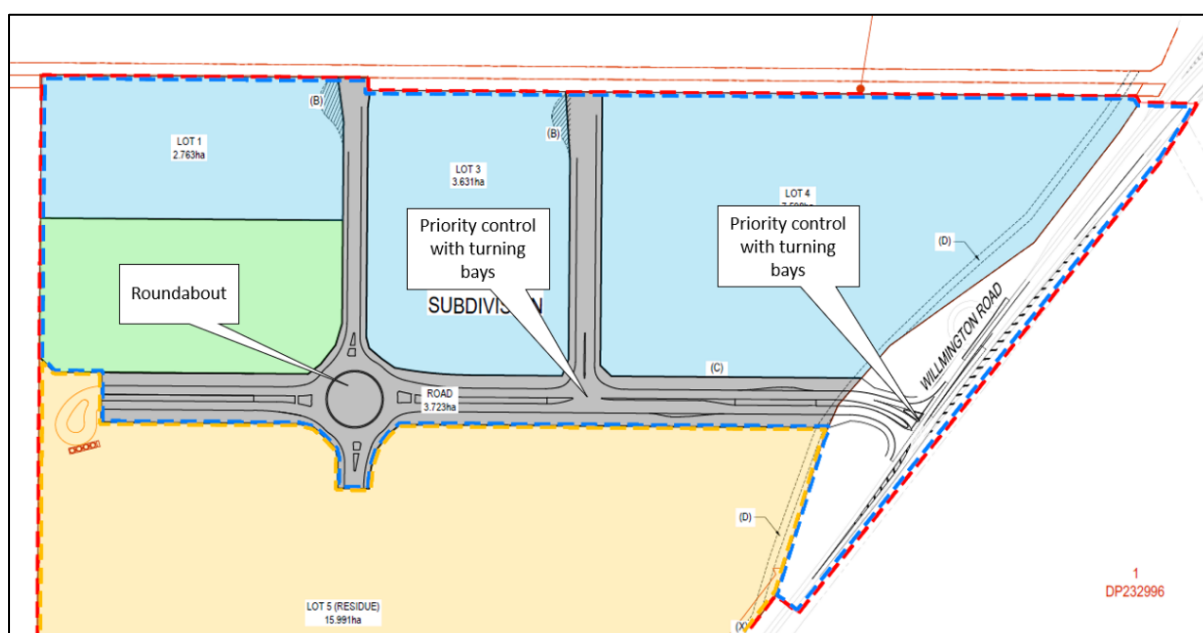
**Figure 26. Willmington Road Intersection Layout**

Source: Orion Group, 2025

#### 7.8.1.5 Vehicle Access and Circulation

A number of internal intersections within the site would be provided to facilitate vehicle access to the individual development lots. A roundabout is to be provided towards the western end of the site which will enable north-south connectivity to adjacent development lots as well as adjoining sites. A priority control intersection, with dedicated turning bays, is to be provided to accommodate access to the future collector road to the north of the site. All internal intersections have been designed to accommodate turning paths of large heavy vehicles including B-Doubles. It is noted that the overall vehicle access strategy for the site is consistent with the road hierarchy identified in the Precinct Plan.

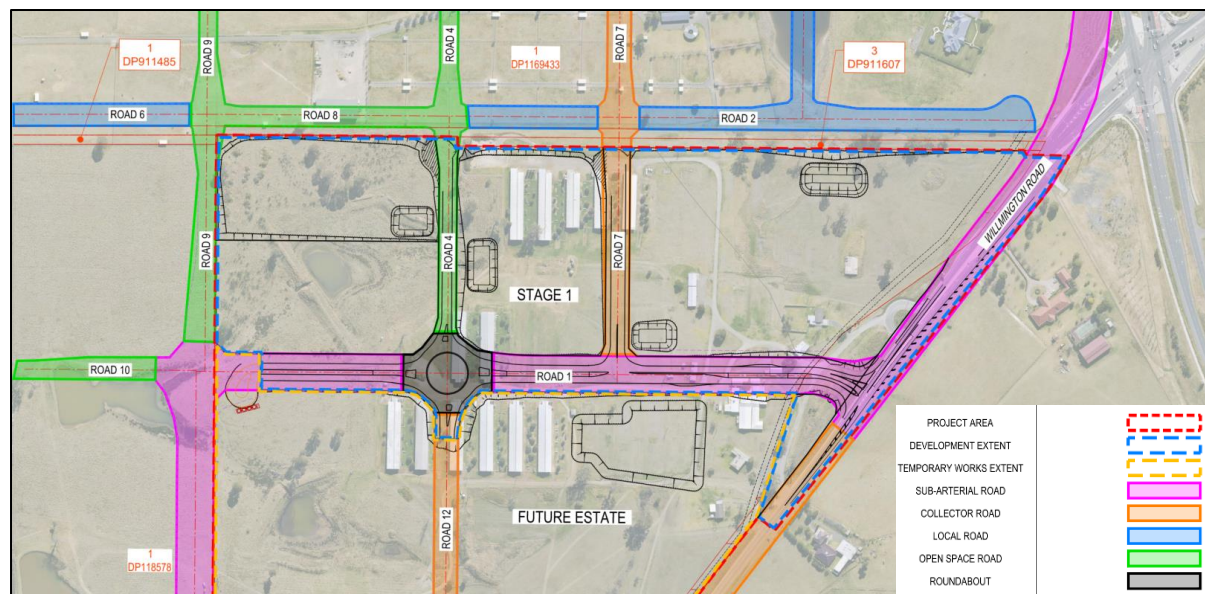
The location of the proposed intersections is visualised in **Figure 27** below. **Figure 28** below illustrates the road hierarchy as shown on the engineering drawings prepared by Orion Group.



**Figure 27. Proposed Internal Intersection Controls**

Source: JMT Consulting, 2025





**Figure 28. Proposed Road Network Hierarchy**

Source: Orion Group, 2025

Detailed swept path diagrams for the largest vehicles manoeuvring through site access points, internal roads, hardstand areas and nearby intersections are available in **Appendix OO**

#### 7.8.1.6 Surrounding Road Network Performance and Capacity

The traffic modelling undertaken to support the proposal has been conducted using the TfNSW approved SIDRA modelling package for the proposed interim intersection on Willmington Road.

As noted above and as demonstrated in the Transport Impact Assessment found in **Appendix OO**, prior to the delivery of the upgraded intersection by TfNSW as per the Precinct Plan, the interim layout as proposed would operate well and will provide safe and efficient access to the site. The interim intersection results in significant levels of spare capacity during the morning and afternoon peak periods. In addition, queue lengths are forecast to be no more than 5m (one (1) vehicle) – noting that this queue length can comfortably be contained within the turning bay to be provided on Willmington Road. No adverse impacts are anticipated at the Willmington Road / Northern Road intersection which is more than 500m away from the proposed access point.

Overall, the surrounding road network provides adequate capacity for the proposed development, see **Table 21** for the detailed results.

| <b>Table 21: Road Network Performance - Willmington Road Intersection</b> |                                                         |                         |                                  |                                               |
|---------------------------------------------------------------------------|---------------------------------------------------------|-------------------------|----------------------------------|-----------------------------------------------|
| <b>Peak Hour</b>                                                          | <b>Existing Conditions + 10 Years Growth + Proposal</b> |                         |                                  |                                               |
|                                                                           | <b>Degree of Saturation</b>                             | <b>Level of Service</b> | <b>Delay(s) - Worst Approach</b> | <b>Max. Queue Length (m) - Worst Approach</b> |
| AM Peak Hour                                                              | 0.23                                                    | A                       | 13s                              | 4m                                            |
| PM Peak Hour                                                              | 0.26                                                    | A                       | 13s                              | 5m                                            |

#### 7.8.1.7 Parking and Active Transport

The DCP sets out the required car parking provisions for industrial and office land uses within the Aerotropolis, noted as follows:

- Warehouse: 1 space per 300m<sup>2</sup> GFA (minimum) / 1 space per 100m<sup>2</sup> GFA (maximum); and
- Office: 1 space per 40m<sup>2</sup> GFA.



The quantum and location of car parking for each development lot will be determined at the time of the relevant detailed Development Application. The road cross sections to be delivered within the site make provision for on-street car parking on the collector and 'open space' roadways.

Similarly, the quantum and location of bicycle parking for each development lot will be determined at the time of the relevant detailed development. In addition to bicycle parking, all future internal roadways will include pedestrian and pedestrian/cycle pathways on both sides of the street. This future infrastructure will support active transport movements to and from the site.

#### **7.8.1.8 Outer Sydney Orbital Impacts**

The proposal is not considered to impact the delivery nor operation of the Outer Sydney Orbital corridor in the following context:

- The site uses and densities proposed are consistent with that envisaged in the Aerotropolis Precinct Plan;
- No direct connections to the Outer Sydney Orbital are proposed; and
- The internal road network aligns with precinct planning and will ultimately connect to the orbital corridor.

#### **7.8.1.9 Mitigation Measures**

An analysis of the traffic generation as a result of the proposed development demonstrates that the road network impacts of the proposal are considered acceptable.

It is important to recognise that the proposal, in terms of proposed uses and scale, is consistent with the controls and strategic planning of the Precinct Plan. Detailed traffic modelling has been undertaken by the Western Sydney Planning Partnership and other Government agencies to validate the future road network servicing the Aerotropolis. This detailed traffic modelling will have already incorporated the expected volume of vehicle trips generated by all uses within the Agribusiness Precinct, including those of the site.

Therefore, all traffic movements associated with the proposed development have already been contemplated as part of the broader network traffic modelling for the precinct. On this basis, the proposal will not impact the operation of the surrounding road network, and no specific traffic mitigation measures are required.

#### **7.8.2 Construction Traffic**

A draft CTMP has been prepared which addresses the proposed access and operation of construction traffic associated with the proposed development with respect to safety and capacity. Key aspects include:

- Future works are expected to be carried out between the standard hours of construction being 7am-6pm Monday to Friday and 8am-1pm Saturday;
- Key traffic routes for construction vehicles would be via Northern Road, Elizabeth Drive, and Willmington Road;
- Construction traffic generation of up to 200 vehicles per day may occur at the peak of the works or 20 vehicles per hour; and
- All construction vehicles are to be accommodated on-site to avoid queuing on public roads.

#### **7.8.2.1 Mitigation Measures**

Mitigation measures will be adopted during the demolition and construction phases to ensure traffic movements have minimal impact on surrounding land uses and the community in general.



Construction traffic will be managed through designated truck routes, forward entry/exit movements, and on-site vehicle accommodation to prevent road queuing. Certified personnel will control site access, manage pedestrian movements, and enforce 30km/h speed limits. All activities will comply with approved hours and relevant safety requirements.

## 7.9 Water Management

### 7.9.1 Stormwater

A Water Management Plan (WMP) has been prepared by Orion Group and is included at **Appendix EE**. The WMP addresses integrated water cycle management for the proposed development and identifies the water-related servicing infrastructure required. The strategy incorporates both interim measures during development staging and ultimate connections to Sydney Water's regional infrastructure.

It is noted that the proposed interim and ultimate stormwater drainage design across both construction and operational phases of the project is consistent with the requirements of the DCP, the Blue Green Infrastructure framework of the Precinct Plan, the *Technical guidance for achieving Wianamatta-South Creek stormwater management targets* and the *Draft Scheme for Infrastructure Design Guideline*.

The stormwater strategy has been developed with consideration of three project phases and is summarised as follows:

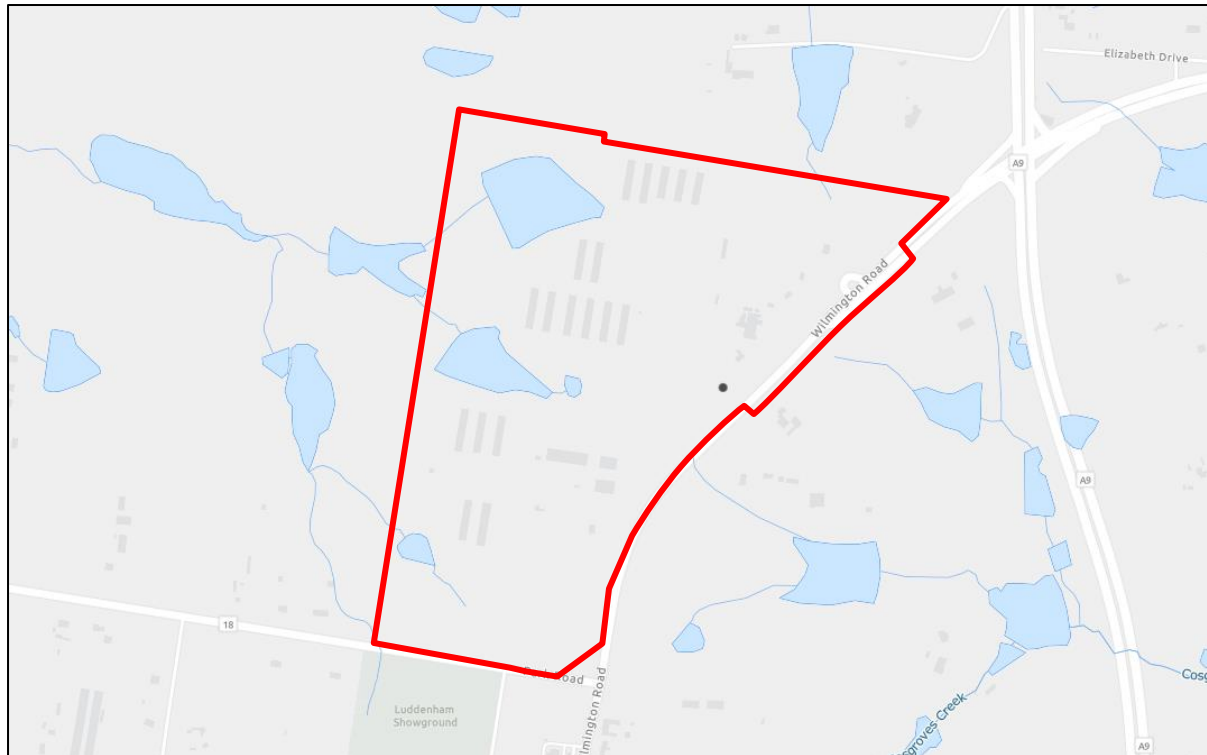
| Table 22. Stormwater Management Plan Phasing |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Phase                                        | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Phase 1</b>                               | Comprises civil works for the subject development including site grading, construction of road infrastructure and stormwater drainage networks. Regional stormwater infrastructure will be delivered through a works-in-kind agreement with Sydney Water, comprising wetland systems, bio-retention facilities and stormwater harvesting infrastructure. These facilities have been designed with sufficient capacity to accommodate the ultimate development scenario across all future stages. Temporary on-site detention basins will be established on Lots 1, 3 and 4 following site grading and stabilisation, sized to compensate for un-detained road runoff. The Sydney Water assets within Lot 2 will be constructed to achieve water quality and quantity objectives for the fully developed scenario. |
| <b>Phase 2</b>                               | Lots fully developed with stormwater to be conveyed and treated by the infrastructure constructed under Phase 1. Under this scenario no other external Sydney Water infrastructure is assumed to be operational.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Phase 3</b>                               | All external Sydney Water infrastructure is assumed to be operational.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

#### 7.9.1.1 Existing Environment

It is understood that the site generally falls to the north and west with existing grades typically ranging between 1% and 3%. The topography is characterised by informal surface depressions and agricultural farm dams that currently manage surface water flows across the site. Hydro lines are identified on the site as obtained from the *Water Management (General) Regulation 2018* hydro line spatial data. Pursuant to the WM Act, hydro lines traverse the site indicating the presence of waterfront land requiring controlled activity approval prior to undertaking works adjacent to these areas, see **Figure 29** below.

It is noted that the site currently discharges stormwater at two (2) locations being the northern boundary adjacent to proposed Lot 4 and the western boundary adjacent to proposed Lot 2.





**Figure 29. Hydro Line Spatial Data**

Source: NSW Government, 2025

### 7.9.1.2 Potential Impacts

The proposed development has the potential to impact water resources during both construction and operational phases.

#### Construction Phase

Construction activities pose risks to water quality through erosion of disturbed areas and stockpiles leading to sediment transportation, increased water turbidity in receiving waters, potential contamination from construction materials and equipment, altered surface water flow patterns during earthworks and potential impacts on existing farm dams during dewatering activities.

#### Operational Phase

Post-development water management impacts include, increased impervious areas resulting in higher stormwater runoff volumes and velocities, potential degradation of water quality from industrial land uses, changes to natural drainage patterns and catchment boundaries, increased pollutant loads including gross pollutants, total suspended solids, nutrients and hydrocarbons and altered hydrology affecting downstream waterways.

#### Flooding Impacts

The development is located at the top of the catchment with existing 1% AEP flow paths traversing the site. Without appropriate management, the development could potentially concentrate flows leading to increased erosion potential, increase peak discharge rates affecting downstream properties and reduce flood storage capacity through filling of existing depressions.

### 7.9.1.3 Mitigation Measures

An integrated water management strategy has been developed. The strategy ensures flooding is mitigated through formalisation of existing flow paths into pit and pipe networks designed to 5% AEP minor and 1% AEP major events, discharging to naturalised trunk drainage channels with capacity for 1% AEP flows.



On-site detention systems will attenuate post-development flows to predevelopment rates for all events up to the 1% AEP storm, with storage requirements ranging from 270 to 410 cubic metres per hectare. These systems over-compensate for un-detained road areas to ensure no net increase in peak discharge rates. During Phase 1, temporary basins will manage flows from stabilised but undeveloped lots, transitioning to permanent underground systems with future development.

Construction phase impacts will be managed through a Soil and Water Management Plan (SWNP) incorporating high-efficiency sediment basins achieving 80% treatment effectiveness. Progressive stabilisation protocols will minimise exposed areas while dedicated dewatering areas manage sediment disposal.

Climate change resilience has been incorporated through assessment of Shared Socioeconomic Pathway (SSP) 2 and SSP5 scenarios to 2090, with trunk drainage channels designed with 500mm freeboard to accommodate projected increases in rainfall intensity of approximately 300mm depth under worst-case scenarios. Bypass systems protect water quality assets from increased flows while maintaining treatment performance under future climate conditions.

The proposed water management approach establishes infrastructure supporting the precinct's transformation while protecting and enhancing waterway health in the Wianamatta-South Creek catchment, meeting all regulatory requirements through each development phase.

#### **7.9.1.4 Sydney Water**

The Sydney Water regional stormwater infrastructure to be constructed within Lot 2 comprises a treatment train achieving water quality targets exceeding DCP requirements. The sediment basin, wetland, bio-retention system and harvesting pond will achieve greater than 90% reduction in gross pollutants and suspended solids, with 80% phosphorus and 65% nitrogen reduction. The harvesting pond will ultimately connect to Sydney Water's recycled water scheme at Kemps Creek, with temporary irrigation areas utilising stored water until regional infrastructure becomes operational. The portion of Lot 4 draining north will require temporary water quality treatment until downstream Sydney Water infrastructure is available. Sydney Water assets have been designed to a strategic level setting key site levels and geometrical features, with detailed design to progress post-approval in consultation with Sydney Water.

It is noted that the outcomes of consultation with Sydney Water regarding the realignment of stormwater infrastructure, including evidence of in principle support, is supplied within the Sydney Water Feasibility Letter appended to **Appendix DD**. This is further confirmed by the basin location as shown in the new Draft Integrated Stormwater Scheme for Duncans Mulgoa released by Sydney Water, see **Figure 17** above.

#### **7.9.2 Groundwater and Surface Water**

An assessment of potential groundwater surface and impacts, both quality and quantity, associated with the development, including potential impacts on watercourses, riparian areas, waterfront land, groundwater, and groundwater-dependent communities nearby is provided within the following consultant reports:

- Groundwater and Surface Water Impact Assessment prepared by Eco Logical Australia (**Appendix BB**);
- Groundwater Investigation prepared by Geotechnique (**Appendix CC**); and
- Riparian Assessment prepared by Eco Logical Australia (**Appendix LL**).

Of note, the Groundwater and Surface Water Impact Assessment includes a review of available hydrological data and environmental information to characterise the existing hydrological environment at the site, including upstream and downstream conditions, an impact assessment





outlining potential impacts from the proposed development on surface water and groundwater resources, including groundwater dependent ecosystems, and provides recommendations regarding potential management and mitigation strategies to prevent and minimise any potential impacts and contingency requirements to address any residual impacts. It is noted that this assessment has been prepared in accordance with the relevant water quality guidelines and the NSW DCCEEW-Water Groundwater Toolkit.

#### **7.9.2.1 Existing Environment**

The site is located within the degraded Duncans Creek catchment, part of the Hawkesbury-Nepean River system. The topography slopes gently westward from 98m AHD in the south-east to 82m AHD in the central west. Three (3) existing farm dams are present in the western portion of the site, connected by ephemeral drainage lines. Mulgoa Creek lies approximately 1.35km west, with Cosgroves Creek to the north-east. No watercourses within the site meet the definition of a 'river' under the Water Management Act 2000.

The site overlies Bringelly Shale of the Wianamatta Group within the Greendale Hydrogeological Landscape. Geotechnical investigations encountered bedrock at 0.5-2.5m depth and recorded groundwater at 2.9-4.9m below ground level, flowing west to south-west. The aquifer is classified as 'Less Productive' under the NSW Aquifer Interference Policy.

No high-value groundwater dependent ecosystems were identified within 500m of the site.

#### **7.9.2.2 Potential Impacts**

Construction activities may cause temporary increases in sedimentation and turbidity from earthworks and vegetation clearing. Minor groundwater inflow may be encountered during excavation for stormwater infrastructure below 3m depth, requiring localised dewatering of less than 3 ML/year. The risk of contamination from construction materials and fuels is considered low with appropriate management.

During operation, increased impervious surfaces will alter catchment hydrology, requiring management of stormwater quality and quantity. Changes to groundwater recharge patterns are expected to be minor and localised.

The assessment concludes that impacts to surface water are unlikely to exceed moderate risk, with most impacts considered low risk due to the distance to major water bodies and implementation of appropriate management measures. Groundwater impacts are assessed as meeting Level 1 minimal impact considerations under the Aquifer Interference Policy.

#### **7.9.2.3 Mitigation Measures**

Construction phase measures will include implementation of a CEMP (**Appendix R**) incorporating erosion and sediment controls in accordance with the Blue Book, designated refuelling areas with appropriate bunding, spill response procedures, and progressive site stabilisation. The Dam Dewatering Plan (**Appendix T**) will guide the decommissioning of existing dams with appropriate water quality testing and treatment.

Operational phase measures comprise implementation of the Water Management Plan (**Appendix EE**) incorporating WSUD principles, construction of bioretention systems and detention basins for stormwater treatment, and direction of treated stormwater to existing drainage lines where feasible. A water quality monitoring program will be established at discharge points to verify compliance with ANZG guidelines.



Where excavations encounter groundwater, conventional sump and pump methods will be employed. Monitoring will ensure dewatering impacts remain within 10% of natural variability near identified GDEs.

With implementation of the proposed mitigation measures, residual impacts to water resources are assessed as low. The development incorporates contemporary water management infrastructure designed to maintain water quality and minimise hydrological changes. The proposal is considered acceptable from a water resources perspective, subject to implementation of the identified mitigation measures and ongoing compliance with regulatory requirements.

## **7.10 Flooding Risk**

The Flood Impact and Risk Assessment (FIRA) prepared by Northrop Consulting Engineers provided at **Appendix Z**. The FIRA aims to identify the existing flood behaviour, assess the likely impact of the proposed development on existing flood behaviour in the vicinity, consider the possible effects of climate change, identify any impacts of the development, review emergency response measures, and outline consistency with policy documents, in particular the:

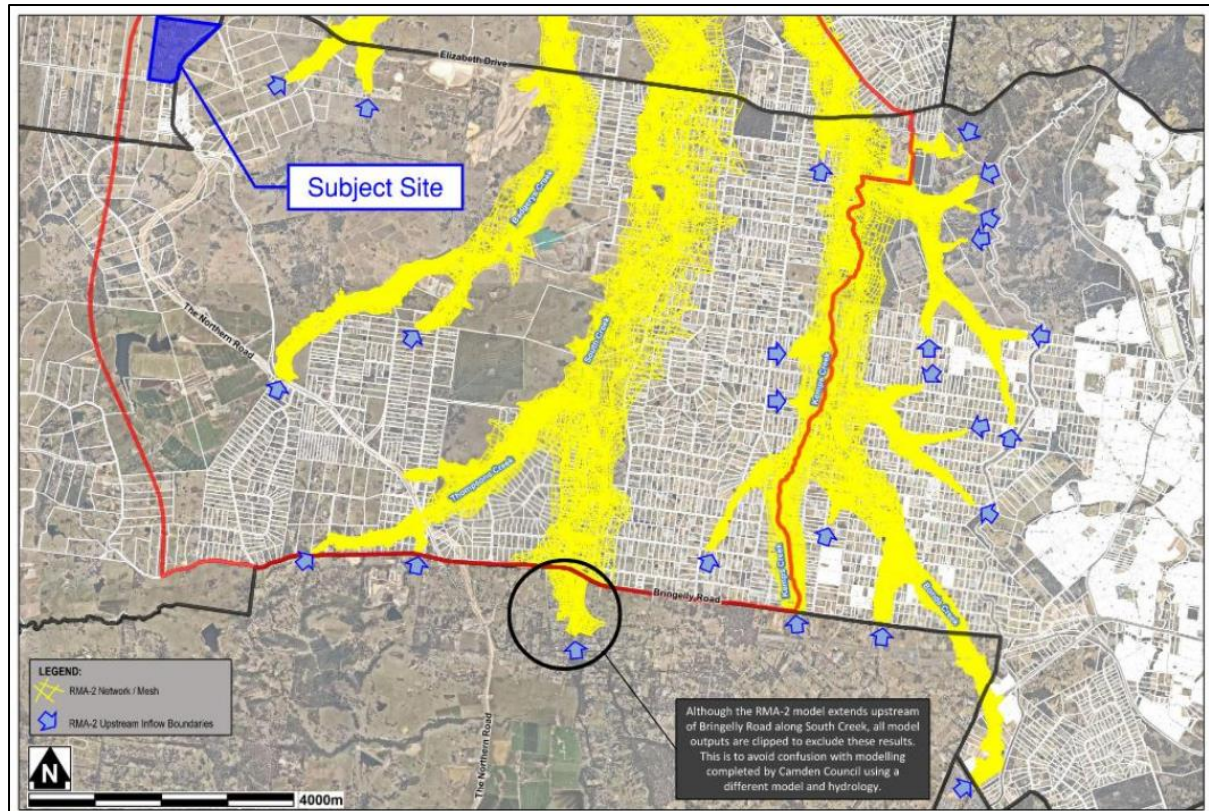
- NSW Flood Risk Management Manual; and
- DCP (Section 2.5.1 – Flood Management).

### **7.10.1 Existing Environment**

The site is located at the top of the Mulgoa Creek catchment, with the catchment crest generally aligning with the alignment with Willmington Road across the site frontage. Due to this topographical position, overland flow at the site is predominantly derived from on-site runoff rather than external flow paths.

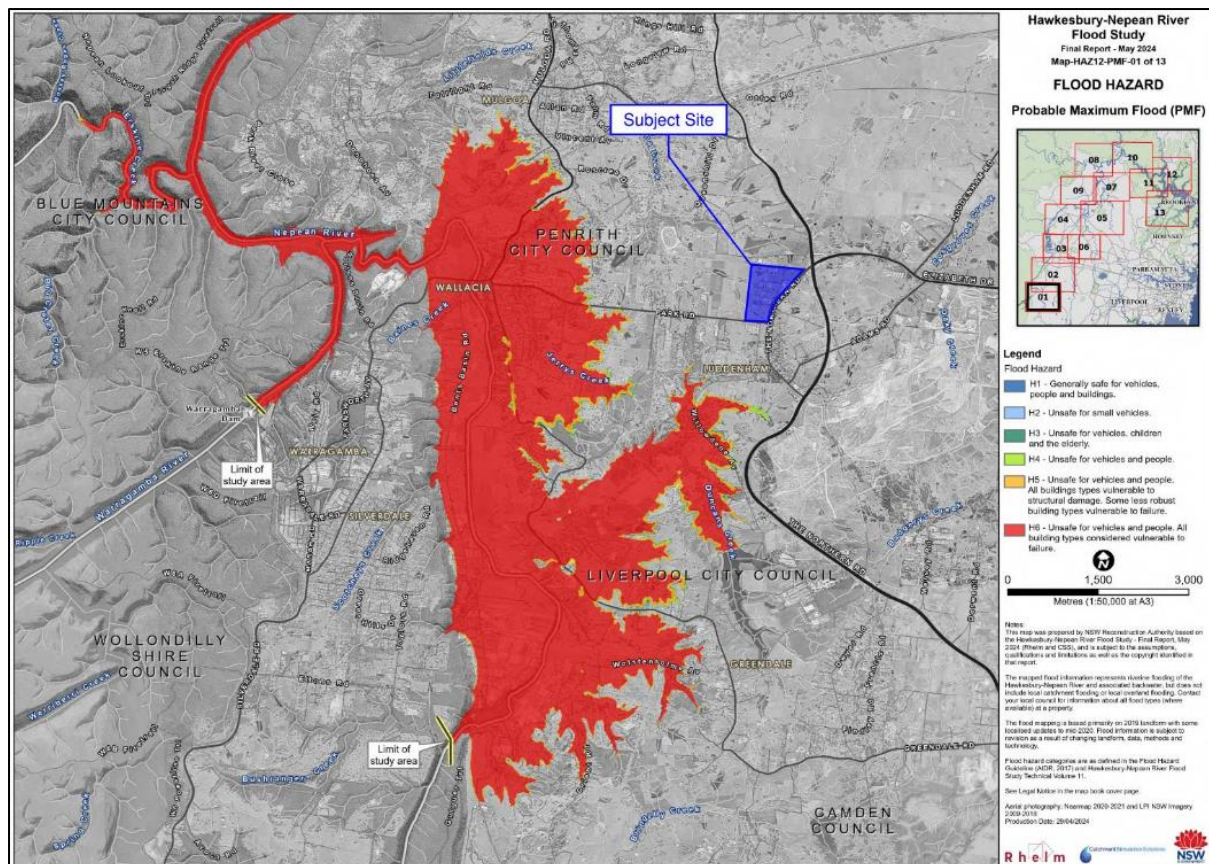
Regional flood studies confirm the site's relative immunity from major flooding events. The Wianamatta (South) Creek Flood Study (Advisian, 2020) and Hawkesbury-Nepean River Flood Study (2024) demonstrate no regional catchment flooding affects the site, including during Probable Maximum Flood (PMF) events, see **Figure 30** and **Figure 31** below.

While the Western Parkland City SEPP identifies local 1% Annual Exceedance Probability (AEP) flow paths traversing the site (shown above as **Figure 8**), its upstream boundary position renders it relatively safe from significant flood hazard.



**Figure 30. Wianamatta (South) Creek Flood Study Existing Conditions**

Source: Northrop Consulting Engineers, 2025



**Figure 31. Hawkesbury-Nepean River Flood Study PMF Flood Hazard Extents**

Source: Northrop Consulting Engineers, 2025



### 7.10.2 Potential Impacts

The proposed development incorporates comprehensive flood mitigation measures through its stormwater management strategy, as detailed in the Water Management Plan prepared by Orion Group (**Appendix EE**). The strategy will be implemented across three phases:

- **Phase 1:** Site grading with temporary on-site detention (OSD) basins;
- **Phase 2:** Development of lots with independent detention systems; and
- **Phase 3:** Integration with Sydney Water infrastructure.

The stormwater management system includes a reticulated pit and pipe network designed to convey the 1% AEP event, on-lot detention systems with controlled outlet structures, conveyance of major flows through the road network and detention basins for road runoff.

DRAINS modelling demonstrates that the proposed detention strategy effectively manages post-development flows to match or reduce pre-development rates. The stormwater detention strategy limits post development site discharges to predevelopment rates for events up to the 1% AEP storm. Flooding is therefore mitigated by means of formalising existing flow into pit and pipe networks discharging to a trunk drainage channel with on-site detention managing peak flow rates.

### 7.10.3 Climate Change Considerations

Climate change has been assessed in the Water Management Plan prepared by Orion Group (**Appendix EE**).

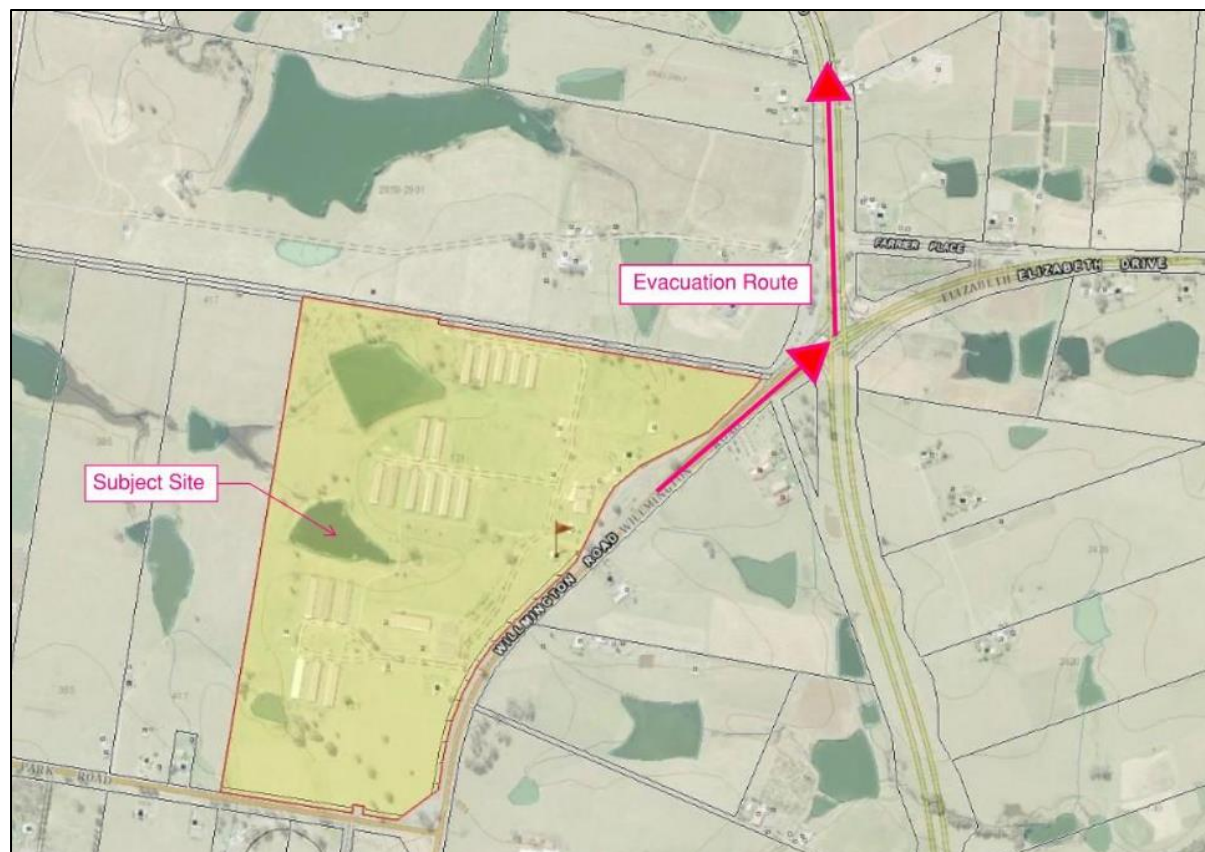
The assessment has incorporated climate change projections to the year 2090, considering both SSP2 and SSP5 scenarios. Analysis indicates that increased rainfall intensities would result in approximately 300mm additional flood depth, which is accommodated within the 500mm freeboard allowance incorporated into the design. The proposed infrastructure demonstrates sufficient capacity to manage climate change impacts whilst maintaining flood immunity standards. It was concluded that the proposed stormwater systems will sufficiently maintain the expected increase in flood depth in the event of a future year 2090 1% AEP flood.

### 7.10.4 Mitigation Measures

The FIRA recommends that the following measures will be implemented to ensure appropriate flood risk management:

- Implementation of the stormwater management strategy including OSD systems and trunk drainage infrastructure;
- Maintenance of post-development peak flows at or below pre-development rates for all events up to the 1% AEP;
- Preparation of site-specific Flood Emergency Response Plans for future lots; and
- Regular maintenance of stormwater infrastructure in accordance with the Water Management Plan (**Appendix EE**).

In terms of emergency management, the primary evacuation route follows Willmington Road north to The Northern Road, maintaining flood-free access above PMF level. Future lot owners will be required to prepare individual emergency response plans as a condition of consent, see Figure 32 below.



**Figure 32. Evacuation Route**

Source: Northrop Consulting Engineers, 2025

The flood impact assessment demonstrates that the proposed development can be developed without imposing adverse flood impacts on surrounding properties, infrastructure or downstream areas. The development incorporates appropriate design responses to manage both current flood risk and projected climate change impacts. Through the implementation of the proposed stormwater management strategy and emergency response measures, the development will maintain or improve existing flood behaviour whilst ensuring the safety of future occupants.

## 7.11 Infrastructure Requirements

This section addresses the infrastructure requirements necessary to support the proposed subdivision. The assessment demonstrates that essential services can be provided to the site through coordinated interim and ultimate servicing strategies aligned with the Western Sydney Aerotropolis infrastructure delivery programme.

An Infrastructure Services Report, available in **Appendix DD**, has been prepared by Orion Group which provides detailed technical assessment of utility services required to support the proposed development. This assessment has been informed by consultation with service authorities including Sydney Water, Endeavour Energy and NBN Co.

### 7.11.1 Existing Environment and Future Delivery

The existing service infrastructure is documented in **Table 23** and accurately plotted on the detailed site survey, contained within **Appendix DD** of this EIS.

**Table 23. Infrastructure Requirements**

| Infrastructure Service | Assessment |
|------------------------|------------|
|------------------------|------------|



|                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Potable Water      | <p>The site is currently serviced by potable water via a watermain in Park Road to the south of the Site. This pipe serves the existing operations with basic water supply for livestock and limited farm operations. An existing potable water easement along the western boundary will be extinguished prior to construction.</p> <p>To meet the water demand for the proposed development, an interim service line from the existing Sydney Water main may be required subject to ongoing discussions with Sydney Water. The ultimate scenario consists of constructing a reservoir along with a booster pumping station and trunk mains along Elizabeth Drive. Hydraulic modelling will be necessary to determine the exact capacity and ensure adequate supply.</p> |
| Wastewater         | <p>The site is not currently serviced by reticulated sewer. The site relies entirely on septic tanks which are periodically pumped out.</p> <p>The proposed development will be serviced by a low-pressure sewer system or gravity system connecting to the Agribusiness gravity carrier and the Upper South Creek Advanced Water Recycling Centre. However, this infrastructure is not anticipated to be delivered until 2027/2028. Sydney Water has approved an interim strategy for the site that consists of tanks holding the incoming flows. Tankers will periodically collect and dispose of the wastewater at an approved facility.</p>                                                                                                                          |
| Recycled Water     | <p>The site is not currently serviced by recycled water.</p> <p>The internal subdivision will be reticulated with recycled water, via a cross-connection to the site proposed potable water network ahead of the regional trunk infrastructure. The regional infrastructure to be provided in future involves the development of the Kemps Creek Advanced Water Recycling Centre. This shall provide treated stormwater and/or recycled wastewater to the Site in the ultimate scenario.</p>                                                                                                                                                                                                                                                                             |
| Electricity        | <p>A network of overhead powerlines currently services the site. It is understood that there is limited capacity in this network, given that it services rural properties. Removal or augmentation of this network will be required.</p> <p>The electricity demand will be met by the Western Sydney Airport 22kV Zone Substation by the end of 2026. A feeder cable will be installed along Elizabeth Drive and Willmington Road, with additional infrastructure and placing the existing overhead networks below ground.</p>                                                                                                                                                                                                                                           |
| Telecommunications | <p>NBN Co has a pit and pipe network within Park Road and Willmington Road.</p> <p>Agreements with NBN will provide the necessary telecommunications infrastructure, with fibre supply assured once the first stage of the pit and pipe network is completed. Coordination with these providers six (6) months before the anticipated works will help ensure timely service delivery</p>                                                                                                                                                                                                                                                                                                                                                                                 |

## 7.12 Contamination

JBS&G were engaged to prepare a DSI for the proposed Willmington Road reserve, supported by a RAP, available **Appendix V** and **Appendix KK** respectively. The purpose of the assessment was to assess the suitability of the site from a contamination perspective for the proposal and to make





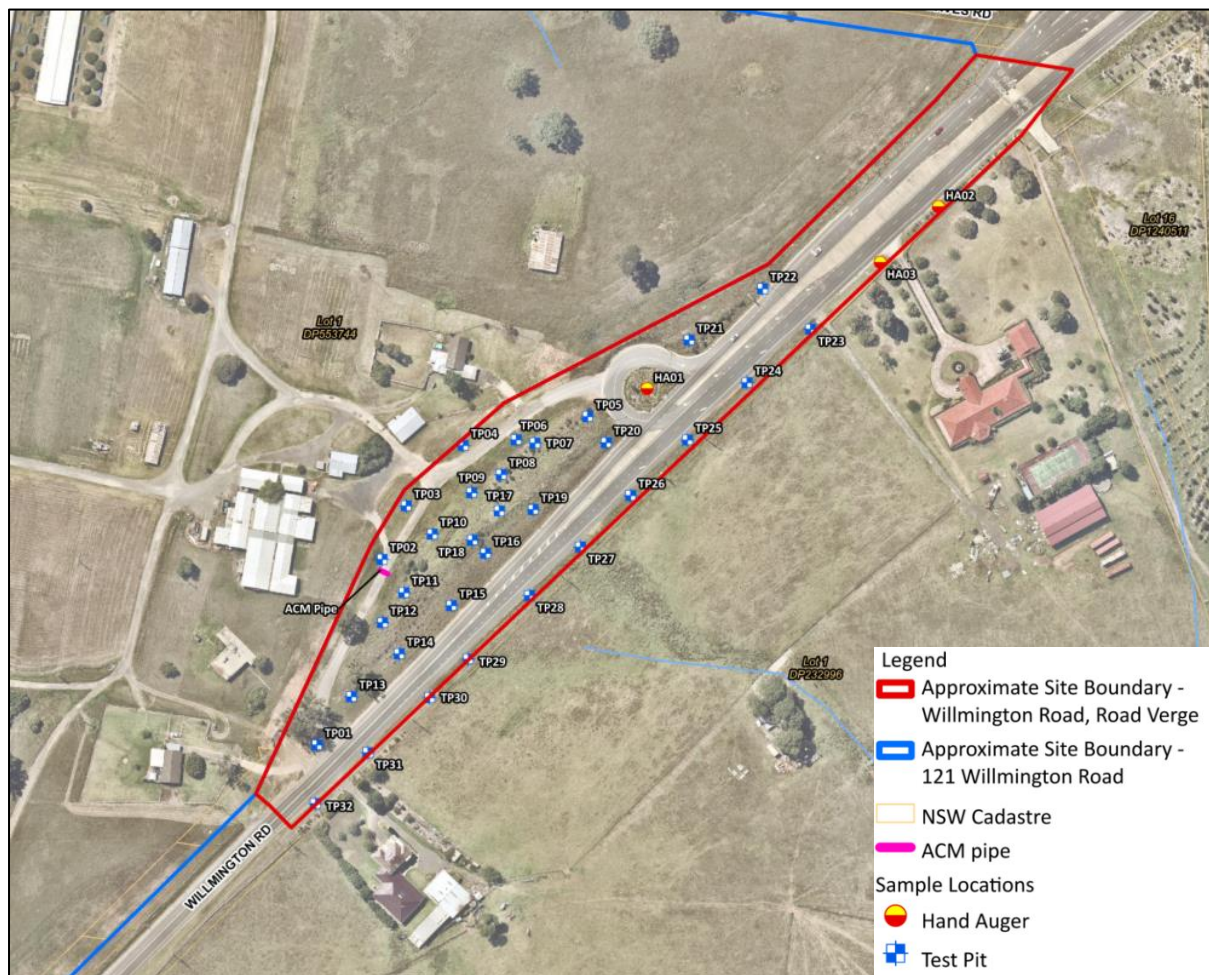
recommendations. It is noted that the demolition of existing structures and remediation works at the site were previously approved under **DA24/0421**, as noted above in **Section 1.5.1**.

The proposed site works pertaining to the DSI comprise the construction of a new intersection on Willmington Road consistent with the current Infrastructure (SP2) zoning of the northeastern portion of the site. The area subject to contamination assessment comprises approximately 2.5 hectares of the Willmington Road corridor, including the road and associated grassed verges.

The scope of work for the DSI comprised review of readily available site history and site condition records and previous reports to identify areas of environmental concern (AECs) and associated contaminants of potential concern (COPC), a detailed inspection of the site and immediate surrounds, intrusive soil sampling on accessible surfaces and stockpiles within the road verges of the intersection area, laboratory analysis of soil samples.

### 7.12.1 Potential Impacts

The site investigation works comprised a detailed site inspection and advancement of 32 test pits and three (3) hand augers across the site from which selected soil samples were submitted for laboratory analysis to sufficiently characterise site conditions.



**Figure 33. DSI Sample Locations**

Source: JBS&G, 2025

Historical investigations indicate the site has been utilised as a road corridor since the construction of Willmington Road in 1955, with subsequent upgrades in 2005 and the establishment of the turning bay between 2020-2021. Potentially contaminating activities identified include:



- Historical use of the land for rural and agricultural purposes and as a road;
- Historic cut and fill levelling works during establishment of the road verge;
- Recent earthworks associated with turning bay construction; and
- Stockpiling of materials from road construction activities.

Additionally, The DSI identified localised contamination impacts comprising:

- Bonded asbestos containing material (ACM) in soil at test pit location TP02, detected in both surface soils and subsurface soils;
- An in-situ damaged bonded ACM pipe identified near TP02 in the southeast portion of the site; and
- A data gap associated with the gravel road in the western portion, which was inaccessible during investigation due to active vehicle use.

As mentioned above, gravel road was inaccessible during the investigation as it was in active use. The gravel road material was identified to be a recycled aggregate; therefore, further investigations are recommended to assess the material. All other laboratory results were below the adopted site criteria for proposed road land use.

### **7.12.2 Mitigation Measures**

The identified ACM impacts are likely to be disturbed during proposed site development works. Under the relevant guidelines, remediation is required to mitigate these risks to ensure site suitability for the proposed development. Notwithstanding, the site can be made suitable for the proposed intersection land use subject to successful remediation and validation during construction works.

Overall, the findings of the DSI did not suggest widespread contamination that could preclude the development of the site. Based on the conclusions present above, the DSI recommends the following actions upon development of the site:

- An Asbestos Management Plan (AMP) and Register should be prepared to meet work, health and safety regulations for the site as a workplace to manage identified asbestos risks in soil until such time as they are removed; and
- A RAP should be prepared for the site to manage the asbestos contamination within the material at TP02, the in-situ ACM pipe, gravel road material data gap and any potential unexpected finds.

A RAP has been prepared by JBS&G, which is available at **Appendix KK**, and outlines the procedures to remediate potential contamination and make the site suitable, with onsite removal of visible bonded ACM as the preferred strategy.

In addition, a Fill Management Plan has also been prepared by JBS&G, which is available at **Appendix Y**, and outlines the procedures and requirements to be followed to ensure that fill materials received onto or reused within the site comply with relevant environmental regulatory requirements and suitable for site use, so that unsuitable materials from a contamination perspective, are not inadvertently brought onto the site or reused onsite.

### **7.13 Noise and Vibration**

A Construction Noise and Vibration Management Plan (CNVMP) prepared by Renzo Tonin & Associates at **Appendix S** includes an assessment of the potential noise and vibration impacts to sensitive receivers during the construction works and traffic generation of the development.

It is noted that operational noise will be considered as part of the future detailed developments for built form.



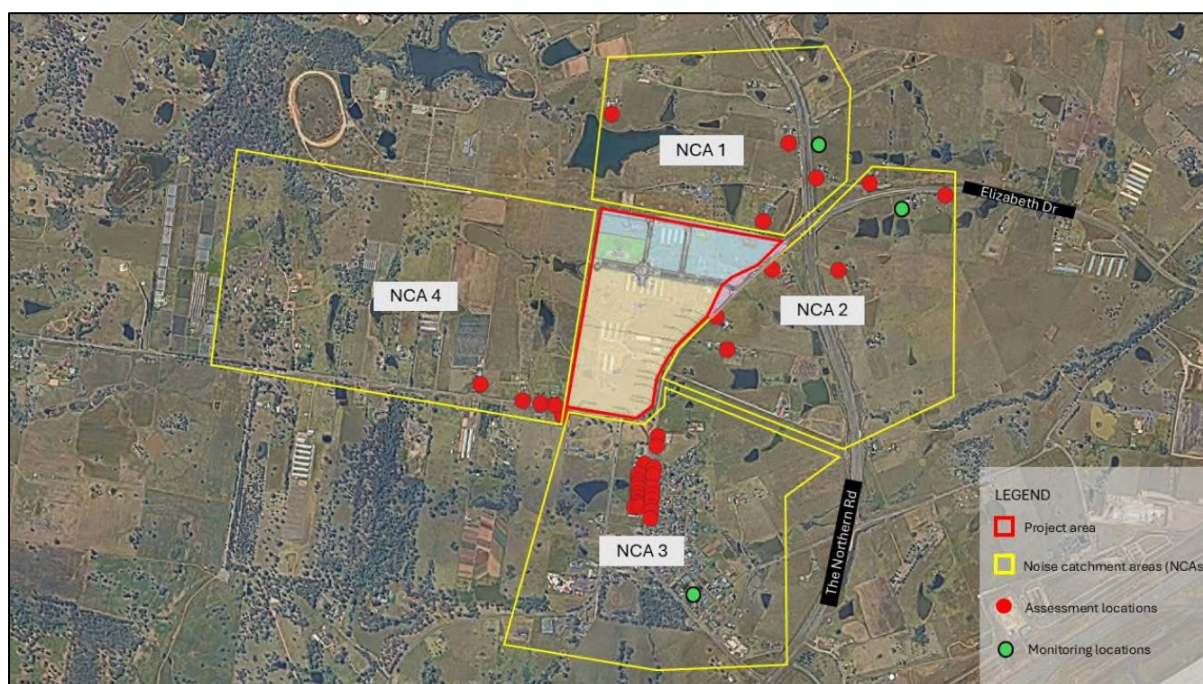
### 7.13.1 Existing Environment

There are multiple rural residential dwellings surrounding the site that could potentially be impacted by the construction works and traffic generation necessary to facilitate the proposed development.

On this basis, the residential receivers have been grouped into Noise Catchment Areas (NCAs) according to shared background noise conditions, as follows:

- NCA 1: relies on ambient noise monitoring data from 2828 The Northern Road, Luddenham, as it is nearby and shares similar environmental conditions;
- NCA 2: uses ambient noise monitoring data from 2289-2311 Elizabeth Drive, Luddenham; and
- NCA 3 & 4: uses ambient noise monitoring data from 8 Wade Close, Luddenham.

The surrounding noise catchment areas, monitoring locations and assessment locations are illustrated in **Figure 34** below.



**Figure 34: Surrounding Noise Receivers and Noise Catchment Areas**

Source: Renzo Tonin & Associates, 2025

### 7.13.2 Noise and Vibration Intrusion Criteria

The CNVMP assesses the likely noise and vibration impacts during construction based on a worst-case scenario. The noise criteria in the Interim Construction Noise Guideline (ICNG) have been adopted for the assessment of noise emissions from the construction of the proposal. The potential disturbance from vibration on the occupants of the surrounding residential and commercial receivers in accordance with the Department of Environment and Conservation 'Assessing Vibration; a technical guideline'.

The ICNG provides two methods for assessment of construction noise, being either a quantitative or a qualitative assessment. Given the scale of the construction works proposed, a quantitative assessment was carried out, consistent with the ICNG requirements.

**Table 24** presents the construction noise management levels established for the nearest noise sensitive residential receivers based upon the noise monitoring undertaken.

**Table 24: Construction Noise Management Levels at Residential Receivers**

| NCA  | Daytime $L_{A90}$ rating background level (RBL) | Construction noise management level $L_{Aeq}$ (15min) | Highly noise affected level<br>$L_{Aeq}(15min)$ |
|------|-------------------------------------------------|-------------------------------------------------------|-------------------------------------------------|
| NCA1 | 46                                              | $46 + 10 = 56$                                        | 75                                              |
| NCA2 | 47                                              | $47 + 10 = 57$                                        |                                                 |
| NCA3 | 35                                              | $35 + 10 = 45$                                        |                                                 |
| NCA4 | 35                                              | $35 + 10 = 45$                                        |                                                 |

It is noted that construction vibration is associated with three (3) main types of impact, being disturbance to building occupants, potential damage to buildings, and potential damage to sensitive equipment in a building.

### 7.13.3 Potential Impacts

The construction works have been structured into four (4) phases:

- Phase 1: Pre-commencement works including erosion and sediment controls, vegetation clearing and dam decommissioning;
- Phase 2: Bulk earthworks including cut and fill, benching, battering and infrastructure connections;
- Phase 3: Civil works including road construction, stormwater infrastructure and integrated water cycle management works; and
- Phase 4: Intersection works on Willmington Road.

Construction activities are proposed to occur during standard hours:

- Monday to Friday: 7:00am to 6:00pm;
- Saturday: 8:00am to 1:00pm; and
- Sunday and public holidays: No work.

However, some out-of-hours (OOH) work will be required for the Willmington Road intersection works to minimise disruption to live traffic.

The assessment indicates that the predicted worst-case construction noise levels are expected to generally exceed the noise criteria established by the ICNG at all NCAs during various phases of work, particularly when activities occur close to receivers. Exceedances are reasonably expected and inevitable due to the close proximity between the site and surrounding receivers, with minimal barriers or screening in between, and therefore are not considered unreasonable in this instance.

Cumulative noise levels from the three (3) loudest plant items operating concurrently range from 36-74 dB(A) depending on distance but remain below the highly noise affected level of 75 dB(A). For OOH work, properties within approximately 700m of the intersection works would experience noise levels exceeding the evening (41 dB(A)) and night-time (39 dB(A)) NMLs. Seven (7) properties have been identified as requiring additional noise management measures during OOH work.

Please see **Figure 35** below which identifies each property that will be affected by OOH work.







**Figure 35. Properties Affected by OOH Work**

Source: Renzo Tonin & Associates, 2025

In relation to vibration, it is expected that the main vibration inducing activities could be soil compaction or subsurface rock breaking, and other activities are generally not considered to be highly vibration-intensive activities.

Where exceedances are inevitable, the CNVMP provides conceptual management procedures and measures to address the short-term impacts during the construction phase. Based on recommended minimum working distances, the assessment found very low risk of structural damage at all receivers and medium risk of human comfort impacts at three (3) residential properties.

#### 7.13.4 Mitigation Measures

Section 5.5 of the CNVMP provides project specific and general management procedures and measures to adequately address the identified impacts of construction activities. Implementation of noise control measures such as those suggested in Australian Standard 2436-2010 'Guide to Noise Control on Construction, Demolition and Maintenance Sites', are expected to reduce the predicted noise levels.

The CNVMP recommends comprehensive measures to manage construction noise and vibration impacts. General noise management includes regular equipment maintenance, limiting simultaneous operation of noisy plant, maximising distances between plant and receivers, and switching off equipment when not in use. A complaints management procedure will be implemented with a direct telephone contact for affected residents.

Specific noise management measures include community consultation and notification procedures, with residents notified prior to Phase 1 works. Where feasible, noisy activities such as dozers, chippers and breakers will be scheduled to weekdays. All personnel will receive site induction and toolbox talks regarding noise management requirements. For OOH work, properties within 700m of intersection works will receive letterbox drop notifications providing early warning, followed by individual briefings within one week prior to OOH work commencement. Phone calls will ensure residents are aware of timing and duration.

Vibration management will include establishing site-specific minimum working distances at commencement of vibration-generating activities, with monitoring conducted in response to

complaints. Work processes and buffer distances will be adjusted as necessary to maintain compliance with human comfort criteria.

The implementation of these measures will ensure construction noise and vibration impacts are minimised to the greatest extent practicable, with residual impacts managed through ongoing monitoring, community consultation and adaptive management approaches. Compliance with the ICNG and relevant vibration guidelines will be maintained throughout the construction period.

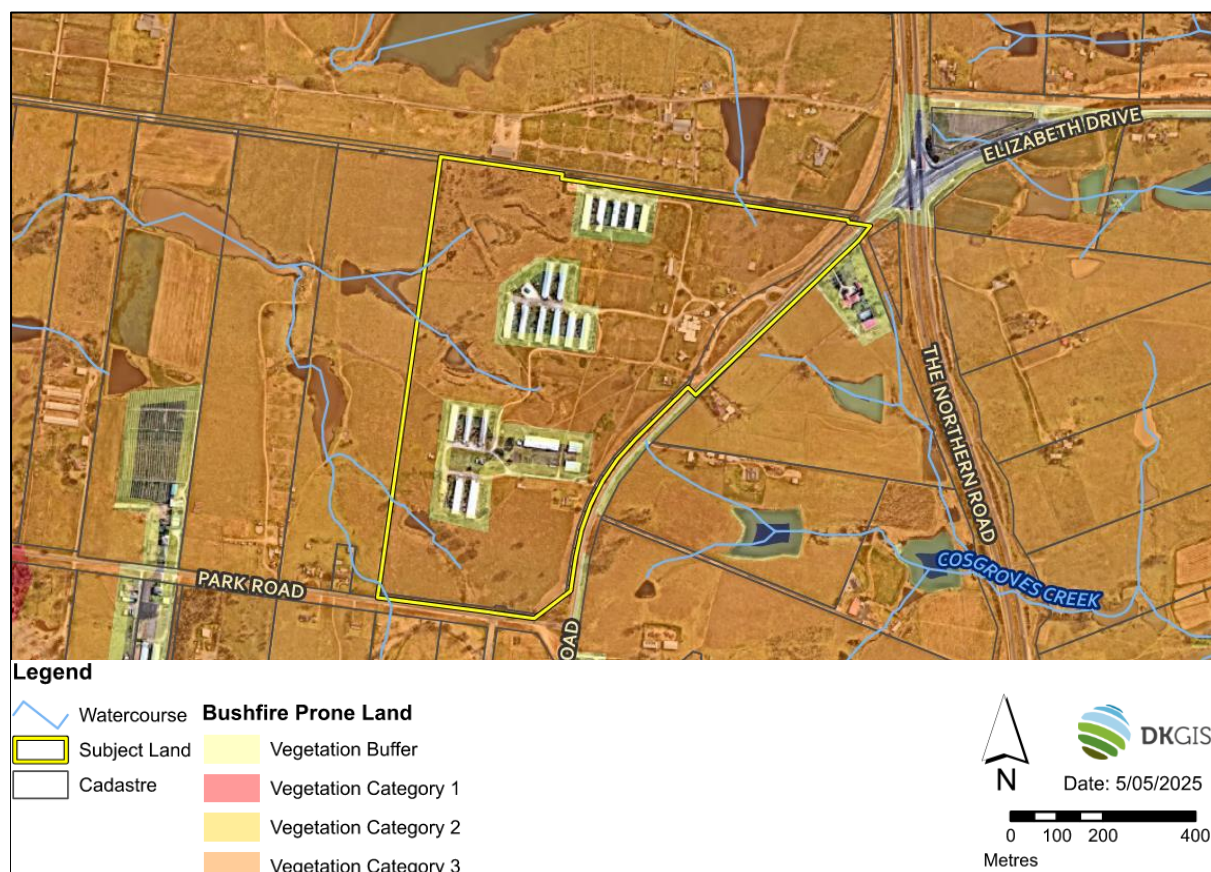
#### 7.14 Bush Fire Risk

A Bushfire Assessment Report (BAR) has been prepared by Peterson Bushfire (**Appendix M**) in support of the project and to address the requirements of the SEARs. The BAR presents identification of the potential bushfire threat to the landscape and offers assessment and recommendations to ensure compliance with the relevant bushfire protection legislation for development proposals on bushfire prone land, in line with the site's level of risk.

##### 7.14.1 Existing Environment

The site, which comprises approximately 55 hectares of cleared land, is identified as bushfire prone land on the NSW Rural Fire Service bushfire prone land mapping, triggering the requirement for detailed bushfire assessment as part of this EIS. Any development proposal within a lot containing mapped bushfire prone land is to comply with the aims and objectives of *Planning for Bush Fire Protection 2019* (PBP).

The mapping presented in **Figure 36** identifies the presence of bushfire prone vegetation within and surrounding the subject land. It is understood that vegetation type is grassland associated with the surrounding agricultural lands.



**Figure 36. Bushfire Prone Land**

Source: Peterson Bushfire, 2025



### **7.14.2 Potential Impacts**

The vegetation communities (bushfire fuels) and the topography (effective slope) combine to create the bushfire hazard that may affect bushfire behaviour at the site. The purpose of bushfire prone land mapping is to identify lands that may be subject to bushfire risk based simply of the presence of vegetation that could act as a hazard. The maps are a planning tool used to trigger further detailed assessment. They do not present a scalable measure of hazard, threat or risk.

An analysis of the vegetation within a 140m radius of the site boundaries, consistent with the methodology prescribed in PBP, was undertaken. The assessment identifies that the site is predominantly surrounded by cleared grazing paddocks.

The site's relationship to surrounding bushfire hazards is defined by clear physical boundaries and separation distances. To the east, Willmington Road provides a buffer between the development and adjacent pastoral lands, while Park Road establishes a similar separation to the south. The northern and western site boundaries directly interface with grazing paddocks on neighbouring properties.

The grassland vegetation identified presents a variable bushfire hazard profile, influenced by several dynamic factors including agricultural management practices, seasonal growth patterns, and the degree of fuel curing. It is important to note that these grassland hazards represent a transitional condition within the broader Agribusiness precinct. As the precinct continues to develop in accordance with the Western Sydney Aerotropolis planning framework, these hazards will be progressively eliminated. The assessment confirms that no other significant bushfire hazards are present within the prescribed 140m assessment zone surrounding the site.

Topographical analysis indicates that the effective slope, which is a key determinant of fire behaviour, has been classified as 'downslope 0-5 degrees' across the majority of the site interface. The exception to this classification occurs south of Park Road, where the topography transitions to an 'upslope' configuration. This favourable topographical profile contributes to a reduced bushfire risk exposure for the proposed development.

### **7.14.3 Mitigation Measures**

The BAR demonstrates that the development can achieve compliance with the objectives of PBP through the implementation of appropriate design responses and management measures. The following design and mitigation measures are proposed to mitigate the bushfire risk:

- Defendable spaces are to be maintained between future warehouses and grassland hazards on adjoining properties to the north and west;
- Internal public roads are to comply with the standard of a 'non-perimeter road' pursuant to the PBP given the grassland hazard context. The proposed internal road network is considered acceptable to ensure appropriate operational access and egress for emergency services personnel given the nature of the bushfire risk;
- Future warehouses within lots adjoining the grassland hazard will require a minimum 6m wide fire access road between the warehouse and the boundary where the grassland hazard remains;
- Landscaping across the site is to comply with the principles listed in the PBP and maximum 40% canopy cover for street trees is acceptable, with landscaping within defendable spaces to be assessed through future development applications;
- Fire hydrants and gas services are to be installed to comply with the relevant Australian Standards for all future warehouse development;
- Hazardous materials storage is not to occur within defendable space areas; and
- Electricity supply is to be provided underground to minimise ignition risks.

Given the low bushfire risk from grassland hazards and the industrial nature of the development, a formal Bushfire Emergency Management and Evacuation Plan in accordance with the Rural Fire



Service (RFS) is not required. Standard NCC fire safety provisions are deemed adequate for future warehouses, without the need for specific BAL construction standards. These determinations reflect the temporary nature of the grassland hazards and the non-residential building classification (Classes 5-8). Future development applications will confirm site-specific requirements should hazard conditions change and evolve.

### 7.15 Airport Safeguarding

An Aeronautical Impact Assessment (AIA) has been prepared by Strategic Airspace Pty Limited to assess the potential impacts of the proposed development on the airspace and aviation operations of Western Sydney Airport.

The AIA identifies potential hazards that could adversely impact the safety, amenity or continuity of the Western Sydney Airport and recommends design measures required to ensure compliance with applicable aviation regulations. The assessment is provided at **Appendix F**.

#### 7.15.1 Existing Environment

The site is located approximately 2.25km north of the Western Sydney Airport's first runway (RWY 05L/23R), which will commence operations when the airport opens in late 2026. A second runway, located further south, is expected to become operational when the first runway reaches capacity, currently anticipated by 2050.

#### 7.15.2 Potential Impacts

The protection of airspace surrounding Western Sydney Airport is critical to maintaining requisite safety standards for airport operations. The proposed subdivision associated site works and subsequent future development of the site must be assessed against the *Aviation Safeguarding Guidelines – Western Sydney Aerotropolis and surrounding areas*, Western City Parkland SEPP, the DCP and the National Airports Safeguarding Framework (NASF).

To ensure the completeness of the assessment, the NASF guidelines are used as a framework for assessment and cross-referenced for compliance with the both the SEPP and DCP.

The potential aviation impacts associated with the proposed development have been assessed against guideline as summarised in **Table 25** below:

| Table 25. NASF Guideline Assessment                                   |                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Guidelines                                                            | Comment                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>NASF Guideline A: Aircraft Noise</b><br>(SEPP c4.17, DCP 2.10.2)   | The site is located outside the Australian Noise Exposure Contour (ANEC) 20 contour. As the development does not involve a proposed land use or built form, aircraft noise provisions are not directly applicable to this application. Future development applications for the subdivided lots will need to demonstrate compliance with relevant noise criteria.                                                    |
| <b>NASF Guideline B: Windshear and Turbulence</b><br>(SEPP c4.18)     | The site is located clear of all windshear assessment trigger areas for all runways. As the proposal does not include any built structures, there is no potential for building-generated windshear or turbulence impacts on the Western Sydney Airport operations.                                                                                                                                                  |
| <b>NASF Guideline C: Wildlife Hazards</b><br>(SEPP c4.19, DCP 2.10.3) | The site is wholly located within the 3-km wildlife buffer zone (Area A) surrounding Western Sydney Airport, where stringent controls apply to minimise wildlife attraction and reduce bird strike risk to aircraft operations. A Wildlife Hazard Assessment and a Wildlife Hazard Management Plan have been prepared by Eco Logical Aus ( <b>Appendix SS</b> and <b>Appendix TT</b> ), which demonstrates that the |

|                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                              | proposed development will reduce wildlife attraction risk across the site through use of select vegetation, planned spacing of trees and managed water features combined with an ongoing monitoring regime.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>NASF Guideline D: Wind Turbines</b> (SEPP c4.20)          | No impact, wind turbines are not proposed as part of this development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>NASF Guideline E: Lighting</b> (SEPP c4.21, DCP 2.10.1)   | The site is located outside the external lighting control zones but falls within the 6-km lighting radius around the aerodrome, within which NASF provides guidelines to help ensure that traffic lights and especially coloured and flashing lights would not confuse or distract pilots. These guidelines are encoded within both the Western Parkland City SEPP and the DCP. As there is no traffic lights proposed, and the required construction lighting will be of low visibility, the lighting of roads, public spaces and construction lights is therefore considered acceptable by the aviation authorities, airport and future aircraft operators. Please see the Lighting Certificate prepared by Branson James Consulting at <b>Appendix HH</b> |
| <b>NASF Guideline F: Protected Airspace</b> (SEPP c4.22)     | The site is wholly impacted by the Inner Horizontal Surface (IHS) of the Obstacle Limitation Surface (OLS), which establishes a height limit of 126m AHD. Given existing ground levels of approximately 80-96m AHD, this provides approximately 30-46m clearance above ground level. This height clearance is sufficient for standard road infrastructure and street lighting, temporary construction equipment and future development potential on subdivided lots. For the Western Sydney Airport, as there are no published PANS-OPS procedures yet against which to assess possible penetrations of the OLS, the OLS is considered a hard limit and approval is expected to be granted for any buildings or cranes that would exceed the OLS.            |
| <b>NASF Guideline G: Aviation Facilities</b> (SEPP c4.23A)   | No impact, the site is laterally clear of all Building Restricted Areas (BRAs) which are the assessment areas associated with communication, navigation and surveillance equipment at the ends of the runways.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>NASF Guideline H: Helicopter Landing Sites</b> (SEPP N/A) | No impact, there are no strategic helicopter landing sites or regular helicopter operations in the vicinity of the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>NASF Guideline I: Public Safety Areas</b> (SEPP c4.23)    | The site is located well outside the Public Safety Areas (PSA) at the runway ends.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

### 7.15.3 Mitigation Measures

The AIA concludes that the proposed subdivision satisfies the Airport Safeguarding requirements for the Western Sydney Airport and it will not adversely affect its airspace nor planned and future aircraft operations.

The following mitigation measures across three (3) key themes based on the abovementioned NASF Guidelines will be implemented to ensure compliance with aviation safeguarding requirements:

#### Wildlife

The site is located wholly within the sensitive 3km wildlife buffer zone. This designation may introduce constraints related to plant species selection for landscaping, the treatment of external waste disposal facilities, storm drain and detention facility design, and potential canopy coverage targets. These elements must be addressed holistically during final master planning to ensure wildlife risks, with or



without mitigation measures, remain within acceptable limits as determined by Western Sydney Airport and aviation authorities. This consideration is particularly critical given the site's position directly beneath the approach and departure paths of the planned second runway.

Measures for ensuring that the risk to wildlife attraction (to reduce the risk of bird strikes on aircraft) is minimised through design and maintenance and mitigation strategies. Key factors include balancing canopy coverage with plant species selection, storm water and detention infrastructure and external waste disposal management.

These measures are addressed in the separate Wildlife Hazard Assessment Report (**Appendix RR**) and Wildlife Hazard Management Plan (**Appendix SS**) prepared by Eco Logical.

#### Protected Airspace

Airspace height constraints imposed by the OLS provide for maximum allowable building heights of 126m AHD across the site. Given the site's ground elevation, this translates to an estimated potential structure height of ~30-34m above ground level, with the same restriction applying to cranes used during construction. For the current proposed subdivision such heights shouldn't pose issues for the installation of ground infrastructure and possible streetlights. Future developments on the subdivisions will need to consider these height restrictions as they apply to building heights and any equipment required during construction of buildings. Thus, the airspace height constraints are not considered an impediment to the proposed development.

#### Construction Activities, Lighting, Airspace

Information on construction-related activities (ie, dust emissions and construction-related equipment and lighting) have been reviewed for potential impact during the subdivision project. It has been determined that these will have no adverse impact on aircraft operations to/from the Western Sydney Airport.

### **7.16 Aboriginal Cultural Heritage**

An ACHAR at **Appendix E** documents the process of investigation and Aboriginal community consultation with regards to Aboriginal cultural heritage. It details the results of the assessment and recommendations for actions to be taken before, during, and after the proposed activities associated with the project in order to manage and protect Aboriginal objects identified by the investigation and assessment of the study area. The ACHAR is prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* and the *Code of Practice for Archaeological Investigation in NSW*.

#### **7.16.1 Consultation**

The consultation process with Aboriginal stakeholders and interested parties was undertaken from December 2023 to February 2025. A total of 23 RAPs expressed their interest in the notification sent in December 2023 about being involved in the consultation process for the site.

Based on the consultation, a draft ACHAR report was prepared and provided to all RAPs for feedback and comment in June 2023. Three (3) responses were received from RAPs, with all responses expressing support of the recommendations made and management procedures proposed in the report. The draft ACHAR was subsequently updated, with this version provided to the stakeholders. All changes were endorsed by the three (3) previous respondents.

#### **7.16.2 Assessment**

The assessment identified 10 Aboriginal archaeological sites within the development site through systematic field survey and test excavation. These comprise three (3) artefact sites, combined with seven (7) isolated finds.



The proposed subdivision will result in direct impacts to all 10 Aboriginal sites. The Aboriginal archaeological sites identified within the study area are considered to display low archaeological (scientific) significance and do not warrant avoidance or mitigation on archaeological grounds. The identified artefacts do not form part of larger deposits at these specific locations and some artefact had been decontextualised through disturbance. Additional Aboriginal objects may exist at these site locations; however, they offer little intrinsic scientific value, being examples of regionally common raw materials and artefact types. Further archaeological investigation of the recovered artefacts is not warranted.

The report concludes that the proposal does not warrant avoidance or mitigation on archaeological grounds. As such, the proposal can proceed without any further testing, salvage, recovering monitoring, or further assessment.

On this basis, while the proposed works will impact Aboriginal cultural heritage values, these impacts are considered acceptable given the low significance of the identified sites.

### **7.16.3 Mitigation Measures**

The involvement of and consultation with Aboriginal stakeholders should continue throughout the life of the project to the extent relevant (i.e. changes to the design and construction of the project impacting Aboriginal cultural heritage). Mitigation measures relating to inductions, and unexpected finds during construction are provided below:

- Inductions: An induction should be provided to all employees, contractors, and sub-contractors engaged in the project on the significance of Aboriginal heritage, that it is an offence to harm Aboriginal objects, and that they should be advised of their responsibilities under the *National Parks and Wildlife Act 1974* in respect of Aboriginal heritage; and
- Unexpected Finds and Human Remains Protocol: If, during the course of the redevelopment of the site, any Aboriginal objects are unexpectedly uncovered or skeletal remains are uncovered, all work in the vicinity should cease, and the consultant should be contacted for further advice in accordance with Sections 11.2 and 11.3 of the ACHAR.

### **7.17 Non-Aboriginal Cultural Heritage**

A Statement of Heritage Impact (SoHI) has been prepared to assess the impact of the proposed development on the cultural and archaeological significance of the site and is included at **Appendix NN**. The SoHI assesses the potential for direct or indirect impacts on items of heritage significance and confirms:

- The site is noted listed on the State Heritage Register, or Western Parkland City SEPP;
- The project area is in proximity to four (4) Western Parkland City SEPP listed items:
  - Showground (SEPP 2021, Number I15);
  - Brick Cottage (SEPP 2021, Number I6);
  - Weatherboard cottage (SEPP 2021, Number I10); and
  - Weatherboard cottage (SEPP 2021, Number I11).

The SoHI concludes that the proposed development will not result in any adverse physical, visual, potential or cumulative heritage impacts the heritage significance of the site or its surroundings.

#### **7.17.1 Mitigation Measures**

As the study area does not contain heritage or archaeological potential or significance, no specific mitigation measures are required. However, the SoHI makes the following recommendations:

- Unexpected Finds: If, during the course of the redevelopment of the site, any archaeological resources are unexpectedly uncovered, all works in the area must cease, the area adequately





protected, and a suitably qualified archaeologist notified so as to carry out more detailed investigation and assessment; and

- **Induction:** All employees, contractors, subcontractors, and other personnel engaged on the site should be made aware of the provisions of the *Heritage Act 1977* and their responsibilities in respect of the same. The heritage induction should cover the historical values of the site and the potential for the project to encounter significant archaeological resources.

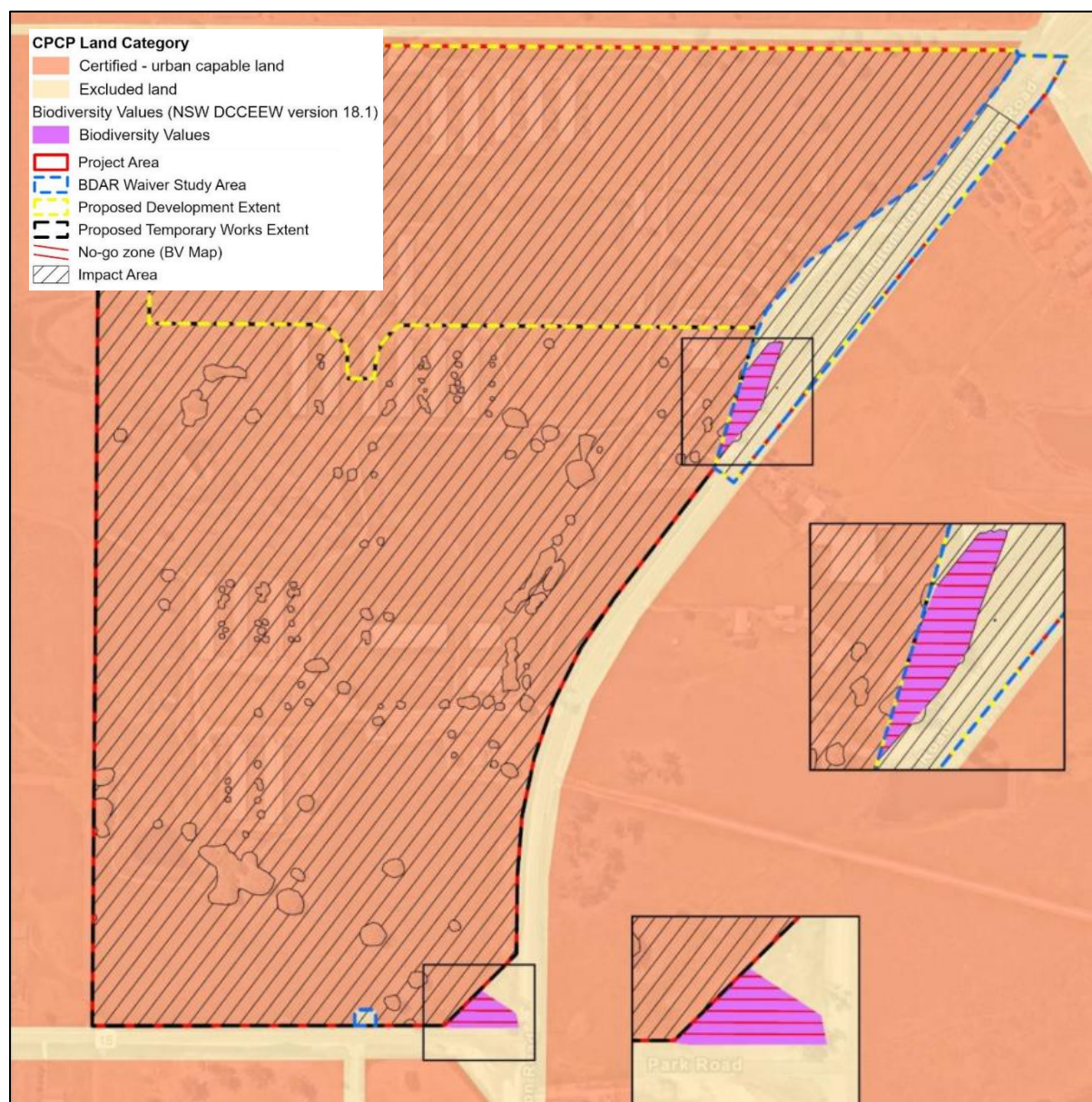
## **7.18 Biodiversity**

The project area comprises approximately 55.65 hectares and is primarily biodiversity certified-urban capable land in accordance with the *Order conferring strategic biodiversity certification - Cumberland Plain Conservation Plan* signed on 20 July 2022 under the BC Act.

Small extents of the project area in the east and south are non-certified excluded land under the CPCP, the majority of which contains built or cleared land and exotic grass. The extent of excluded land subject to impacts as a result of the proposed development does warrant the undertaking of an extensive biodiversity assessment as there are no sensitive ecological values associated with the area, which is visualised in **Figure 37** below.

Accordingly, a BDAR Waiver (**Appendix J**) under Section 7.9(2) of the BC Act was requested and subsequently obtained for the extent of excluded land, being the non-biodiversity certified land. The BDAR confirms that the development is not likely to have any significant impacts on biodiversity values.





**Figure 37. Biodiversity Certification and BDAR Waiver Identified Land**

Source: Eco Logical Australia, 2025

### 7.18.1 Existing Environment

Notwithstanding the above, a Biodiversity Assessment has been prepared by Eco Logical Australia in accordance with the BC Act, available at **Appendix I**. The Biodiversity Assessment showcases the biodiversity values of the site in conjunction with the consistency between the proposed development and the Precinct Plan and the DCP. As mentioned previously, the majority of the project area is certified-urban capable land under the BC Act, via the CPCP. Biodiversity certified land requires no further assessment of biodiversity values in accordance with Chapter 8 of the BC Act.

Two (2) Plant Community Types (PCTs) are present within the project area, including:

- PCT 3320: Cumberland Shale Plains Woodland; and
- PCT 3975: Southern Lower Floodplain Freshwater Wetland.

It is noted PCT 3320 meets the criteria for listing as a critically endangered ecological community listed under the BC Act, as Cumberland Plain Woodland in the Sydney Basin Bioregion. The extent of PCT



3320 within the project area does not meet the condition threshold for listing as a threatened ecological community under the EPBC Act because the patch size and groundcover requirements were not met.

#### **7.18.2 Potential Impact**

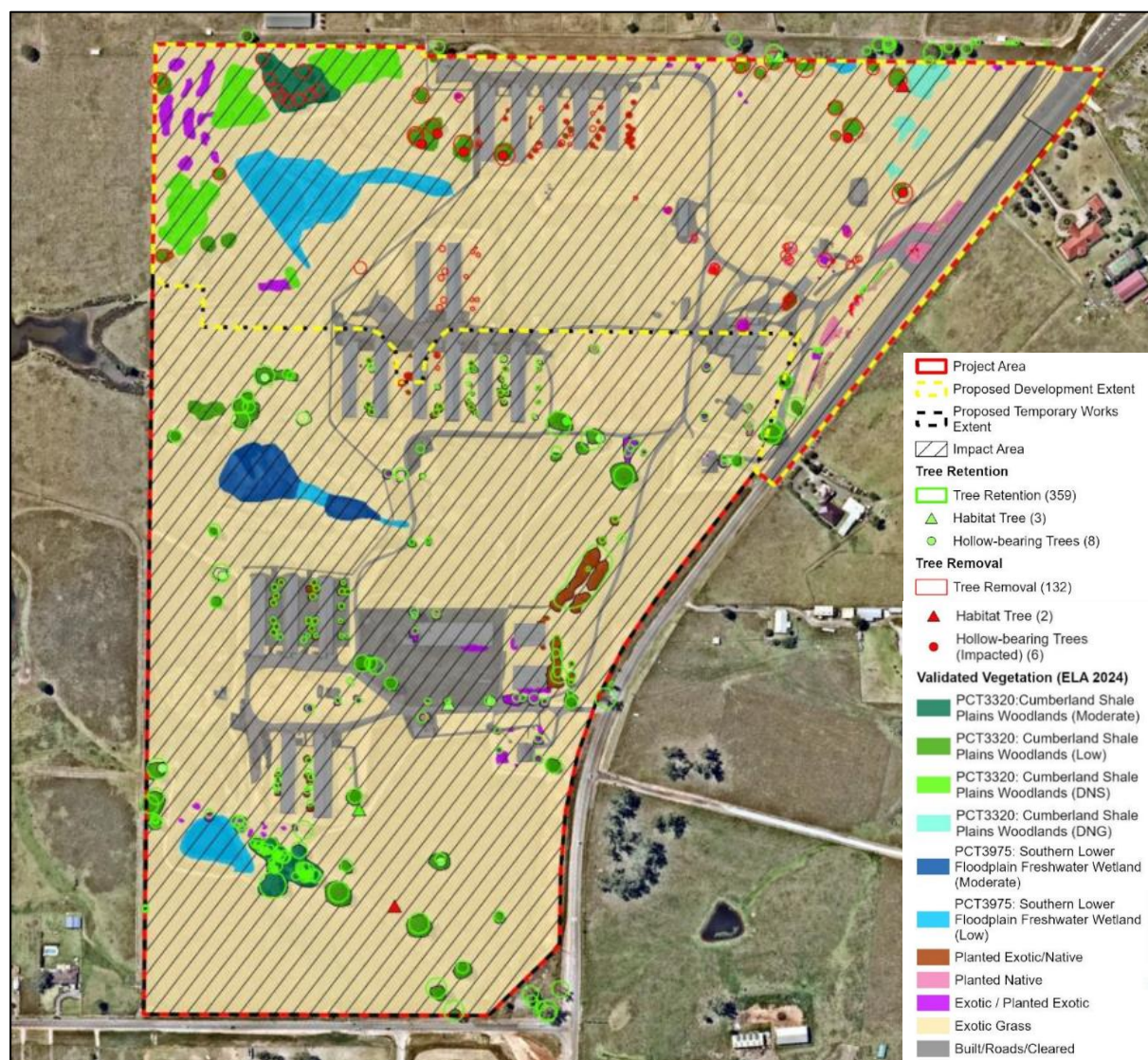
Within the north, east and south of the project area is a small area of non-biodiversity certified land. Impacts of the development will be limited to the eastern portion of the project area.

Of the 2.8 hectares of Cumberland Plain Woodland across the project area, 0.01 hectares of this is within the impact area on non-biodiversity certified land in low condition. Tests of Significance pursuant to the BC Act were completed for this community and threatened fauna species that have the potential to occur, which concluded that a significant impact is not likely to occur as a result of the proposed development. A request to waive the requirement for a BDAR was prepared and subsequently granted as of 2 October 2025.

PCT 3975 can correspond to a threatened ecological community under the BC Act, but the extent of this community within the project area does not meet the listing criteria because it is associated with artificial farm dams. No threatened ecological communities listed under the EPBC Act are present in the project area. Areas of Biodiversity Value (BV) mapped land will be protected, with a no-go zone established for the duration of construction to avoid impacts. A significant impact to MNES is not likely to occur as a result of the proposed development.

**Figure 35** below summarises the potential impacts to vegetation and habitat features within the project area.





**Figure 38. Vegetation and Habitat Feature Impacts**

Source: Eco Logical Australia, 2025

### 7.18.3 Mitigation Measures

Mitigation measures have been proposed to address residual impacts to native vegetation and native fauna (including threatened species) that have the potential to occur within the project area. The following management plans have been prepared to guide management of biodiversity:

- Biodiversity Management Plan prepared by Eco Logical Australia (**Appendix K**);
- Dam Dewatering Plan prepared by Eco Logical Australia (**Appendix T**); and
- Weed Eradication Management Plan prepared by Eco Logical Australia (**Appendix RR**)

The Biodiversity Assessment concludes that if recommended mitigation measures are implemented, impacts to flora and fauna will be appropriately managed.

### 7.19 Social Impact

A Social Impact Assessment (SIA) has been prepared by Willowtree and included at **Appendix MM**. This SIA has been prepared in accordance with the *Social Impact Assessment Guideline for State Significant Projects* (2025) and the *Cumulative Impact Assessment Guidelines for State Significant Projects* (2022).

The purpose of the SIA is to assess the impacts of the proposed development, both positive and negative, identify appropriate mitigation and enhancement measures, and provide recommendations aligned with professional standards and statutory obligations.

The SIA is to be read in conjunction with the Engagement Outcomes Report prepared by Willowtree Communications, discussed above in **Section 6** and appended at **Appendix C**, as the findings directly inform the assessment of social impacts by providing locally relevant insights, stakeholder perspectives, and community feedback.

The SIA methodology considered potential changes to eight (8) social elements of value to people in line with the DPHI guidelines, including way of life, community, accessibility, culture, health and wellbeing, surroundings, livelihoods, and decision-making systems.

The key findings of the SIA based on each impact category are provided in the ensuing sections below, across three (3) defined stages being site remediation and construction, post-construction and operational impacts, and cumulative impacts.

#### 7.19.1 Site Remediation and Construction Impacts

The construction and post-construction social impact assessment results are summarised **Table 26** and **Table 27**, which describe each impact, the type of impact (positive or negative and an assessment of its likelihood, magnitude and overall significance of the residual impact.

| Table 26: Site Remediation and Construction Social Impact Summary |                     |                                                                                                                                                                                                     |                 |
|-------------------------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Impact                                                            | Significance Rating | Mitigation Measures                                                                                                                                                                                 | Residual Impact |
| <b>Positive Impacts</b>                                           |                     |                                                                                                                                                                                                     |                 |
| Employment Generation                                             | Medium              | No further measures required.                                                                                                                                                                       | Medium          |
| Aboriginal Heritage                                               | Medium (Negative)   | ACHAR implementation, Connection to Country Framework incorporated into the landscape and subdivision design                                                                                        | Low (Positive)  |
| <b>Negative Impacts</b>                                           |                     |                                                                                                                                                                                                     |                 |
| Noise and Vibration                                               | Medium              | CEMP implementation, notification procedures, vibration monitoring                                                                                                                                  | Medium          |
| Air Quality                                                       | Medium              | Dust suppression, screening, site layout planning                                                                                                                                                   | Low             |
| Traffic Disruption                                                | Medium              | Implementation of a CTMP, designated truck routes, traffic management                                                                                                                               | Medium          |
| Local Character and Vegetation Loss                               | Medium              | Implementation of CEMP, Tree Protection Plan, and Landscape Plan.                                                                                                                                   | Low             |
| Site Contamination Risk                                           | High                | Provided that the site remediation is carried out as per the RAP, no further measures are suggested.                                                                                                | Low             |
| Flood Control                                                     | Medium              | Formalisation of existing flow into pit and pipe networks discharging to a trunk drainage channel with on-site detention managing peak flow rates, implementation of Flood Emergency Response Plan. | Low             |





**Table 26: Site Remediation and Construction Social Impact Summary**

|                         |        |                                                                                                   |     |
|-------------------------|--------|---------------------------------------------------------------------------------------------------|-----|
| Non-Aboriginal Heritage | Medium | Heritage induction, unexpected finds procedure                                                    | Low |
| Decision Making         | Medium | Community engagement via community newsletter and ongoing communication with adjoining landowners | Low |

**7.19.2 Post-Construction and Operational Impacts****Table 27: Post-Construction and Operational Social Impact Summary**

| Impact                              | Significance Rating | Mitigation Measures                                                                                                                                                  | Residual Impact   |
|-------------------------------------|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| <b>Positive Impacts</b>             |                     |                                                                                                                                                                      |                   |
| Activation of Agribusiness Precinct | High                | The development is likely to catalyse economic activity and support long-term employment within the local economy. No further measures required.                     | High              |
| Productivity and Employment         | High                | The proposal will support the broader objective of the Aerotropolis to deliver 200,000 jobs in Western Sydney over the coming decades. No further measures required. | High              |
| Access and Safety                   | Medium (Negative)   | Internal road network designed in accordance with the Precinct Plan, tree planting along street verges for safe and comfortable active transport                     | Low (Positive)    |
| Urban Heat                          | Medium (Negative)   | Revegetation of the site including local endemic species creating dense tree canopy to reduce urban heat island effect                                               | Medium (Positive) |
| <b>Negative Impacts</b>             |                     |                                                                                                                                                                      |                   |
| Traffic and Parking                 | Medium              | Interim intersection to ensure satisfactory operation with spare levels of capacity of accommodate future development.                                               | Low               |
| Bushfire Risk                       | Medium              | Appropriate design and layout of internal roads for fire safety, reduced fuel loads through establishment of Asset Protection Zones                                  | Medium            |

**7.19.3 Cumulative Impacts**

**Table 28** summarises the cumulative impacts identified in relation to concurrent development within the Western Sydney Aerotropolis. The assessment takes into account an array of ongoing projects, including those aforementioned in **Table 4**.

An analysis of development activity, major projects and planning proposals in the social locality has identified various projects underway or approved that require consideration, especially within a 2km radius of the site, revealing that the area is undergoing the delivery stage from the Aerotropolis Precinct Plan. The summary is organised in accordance with the Cumulative Impact Assessment Guidelines, with the status and timing of development identified.

| <b>Table 28: Cumulative Impact Summary</b>                             |                                                                                                                            |                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Project</b>                                                         | <b>Address and Proximity</b>                                                                                               | <b>Description</b>                                                                                                                                                                                                                                                                                                                    | <b>Cumulative Impact</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Western Sydney Airport</b>                                          | <p><b>Address:</b> 100 Eaton Rd, Luddenham NSW 2745</p> <p><b>Location:</b> About 2.2 km to the south-east of the site</p> | <p><b>Description:</b> Construction and operation of a new airport in Western Sydney</p> <p><b>Status:</b> Construction began in September 2018, it is still underway and on track to begin operations in 2026.</p>                                                                                                                   | <p>The Western Sydney Airport is designed to operate 24/7 without curfew, which unlocks opportunities for airlines and new routes, including more affordable low-cost carriers. It will also open secondary job opportunities built around the airport operations, including in the Agribusiness precinct.</p> <p>During construction, the project is estimated to support over 11,000 job-years. Once operational, the airport is projected to support around 28,000 direct and indirect jobs by 2031, increasing to nearly 48,000 jobs by 2041.</p> <p>Additional pressure on the road network due to the operation of the airport is expected. This has been a major driver for investment in the arterial road network in the Aerotropolis, including the new M12 link currently under construction as well as public transport, including the Sydney Metro and bus network expansion.</p> |
| <b>Western Sydney Airport Business Park</b><br><br><b>SSD-64409468</b> | <p><b>Address:</b> 2422-2430 The Northern Road, Luddenham</p> <p><b>Location:</b> 2.9 km south-east of the site</p>        | <p><b>Description:</b> Construction and operation of the Western Sydney Airport Business Park comprising earthworks, retaining walls, estate-wide infrastructure, development of nine (9) buildings for agribusiness uses, landscaping and riparian corridor works.</p> <p><b>Status:</b> Response to Submissions post exhibition</p> | <p>Post-construction, the business park is expected to drive economic growth, synergising with other developments by attracting complementary industries and boosting employment in the region.</p> <p>Overlapping construction and traffic movements may cause road congestion; however, the Northern Road was upgraded in anticipation of this type of future development and expanded public transport services are planned to support access for workers.</p>                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Burrah Park</b><br><b>SSD-70316465</b>                              | <p><b>Address:</b> 1953-2109 Elizabeth Drive, Badgerys Creek</p>                                                           | <p><b>Description:</b> The project is a 171 hectare industrial estate, encompassing approximately 630,000 square metres of Gross Floor Area. The project involves a</p>                                                                                                                                                               | <p>Burrah Park sets out to establish a logistics and warehousing hub in the centre of the Northern Gateway Precinct of the Aerotropolis and is expected to deliver 6,500 direct jobs, activated during the construction and operation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |



| Table 28: Cumulative Impact Summary                                                  |                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                      | <p><b>Location:</b> About 1.5 km south-east to the site</p>                                                                  | <p>Concept proposal for an industrial warehouse and logistics estate with a Stage 1 development including bulk earthworks, road access and internal road construction, civil infrastructure and utilities, and construction and operation of 3 warehouses</p> <p><b>Status:</b> The project is currently responding to submission after exhibition of EIS</p> | <p>The site access is via Elizabeth Drive, a State arterial road aligned in an east-west direction adjacent to the southern boundary, and this is likely to have traffic impacts during the construction stage. Potential impacts on traffic congestion are to be addressed into the future with ongoing upgrades to Elizabeth Drive.</p> <p>The rural landscape is changing due to concurrent development as part of the development of the Aerotropolis.</p>                                                                                                                 |
| <p><b>DHL Logistics Facility, Badgerys Creek (North)</b><br/><b>SSD-70817958</b></p> | <p><b>Address:</b> 1953-2109 Elizabeth Drive, Badgerys Creek</p> <p><b>Location:</b> About 1.5 km south-east to the site</p> | <p><b>Description:</b> Construction and fit out of two (2) warehouse buildings and ancillary office space, hardstand, loading docks and car parking, landscaping and signage, located within the Burra Park estate.</p> <p><b>Status:</b> The project is currently responding to submission after exhibition of EIS</p>                                       | <p>The DHL logistics facilities are expected to support local job creation and procurement opportunities linked to the Burrah Park development. According to the DHL Social Impact Assessment Addendum prepared by URBIS (2024):</p> <p>DHL Logistics North is expected to generate:</p> <ul style="list-style-type: none"> <li>▪ 199 direct and 326 indirect job years during construction</li> <li>▪ 628 ongoing operational jobs</li> <li>▪ 670 additional flow-on jobs in related sectors</li> <li>▪ \$93 million per year contribution to GDP once operational</li> </ul> |
| <p><b>DHL Logistics Facility, Badgerys Creek (South)</b><br/><b>SSD-70818708</b></p> | <p><b>Address:</b> 1953-2109 Elizabeth Drive, Badgerys Creek</p> <p><b>Location:</b> About 1.5 km south-east to the site</p> | <p><b>Description:</b> Construction and fit out of two (2) warehouse buildings and ancillary office space, hardstand, loading docks and car parking, landscaping and signage, located within the Burra Park estate.</p>                                                                                                                                       | <p>DHL Logistics South is expected to generate:</p> <ul style="list-style-type: none"> <li>▪ 219 direct and 359 indirect job years during construction</li> <li>▪ 693 ongoing operational jobs</li> <li>▪ 743 additional flow-on jobs in related sectors</li> <li>▪ \$102 million per year contribution to GDP once operational</li> </ul> <p>Key considerations being managed at a local level include noise, vibration, air quality impacts. Impacts on traffic</p>                                                                                                          |



| Table 28: Cumulative Impact Summary                                        |                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                            |                                                                                                                     | <p><b>Status:</b> The project is currently responding to submission after exhibition of EIS</p>                                                                                                                                                                                                                                                                                                                     | <p>congestion are to be addressed into the future with ongoing upgrades to Elizabeth Drive. The rural landscape is changing due to concurrent development as part of the development of the Aerotropolis.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b>Luddenham Resource Recovery Facility</b></p> <p><b>SSD-10446</b></p> | <p><b>Address:</b> 275 Adams Road Luddenham</p> <p><b>Location:</b> 3 km to the south of site</p>                   | <p><b>Description:</b> The proposed development involves the construction and operation of a resource recovery facility with capacity to receive and process up to 600,000 tonnes per annum of general solid waste (non-putrescible), comprising of construction and demolition waste and commercial and industrial waste for recycling</p> <p><b>Status:</b> The project is currently undergoing determination</p> | <p>Concurrent construction may escalate noise and dust levels and are anticipated to observe any required mitigation measures.</p> <p>Once operational, the resource recovery facility might contribute to air and water quality concerns, with heavy vehicle traffic adding pressure on road infrastructure. However, it could support sustainability goals by offering waste management services for future tenants in the region.</p>                                                                                                                                                                                                                                                                                          |
| <p><b>Barings Luddenham Industrial Park</b></p> <p><b>SSD-48438209</b></p> | <p><b>Address:</b> 2289-2309, 2311 Elizabeth Drive, Luddenham</p> <p><b>Location:</b> 2.3 km south-west of site</p> | <p><b>Description:</b> Construction and a 24/7 operation of warehouse and distribution centre estate comprising the operation of seven (7) warehouses and distribution centre buildings</p> <p><b>Status:</b> Approved 15 April 2025.</p>                                                                                                                                                                           | <p>The project is estimated to create 250 direct FTE jobs during operation and 350 FTE jobs across the broader economy from production and consumption-induced effects, which is worth \$82.7 million per annum.</p> <p>Concurrent construction activities could exacerbate traffic congestion, noise pollution, and dust emissions. During operation, the warehouse estate may introduce heavy-vehicle traffic, adding pressure to roads- especially The Northern Road and Elizabeth Drive. Impacts on traffic congestion are to be addressed into the future with ongoing upgrades to Elizabeth Drive.</p> <p>The rural landscape is changing due to concurrent development as part of the development of the Aerotropolis.</p> |



#### **7.19.4 Mitigation Measures**

The SIA found that the overall positive social impacts of the proposal during operation, are likely to deliver benefits in relation to way of life, accessibility, surroundings, health, community, and culture. The assessment of negative impacts shows the potential for residual impacts, and the following sets out recommendations for implementation by the Proponent. Overall, as part of the transition to agribusiness, further opportunities to enhance the precinct outcomes will also be available as part of future development applications.

The mitigation measures recommended in the SIA are provided below:

##### Construction Phase

- Prior to commencement of construction, a detailed CEMP is to be prepared;
- Building on the CTMP prepared as part of the Transport Impact Assessment Report (**Appendix OO**) a CTMP is to be implemented prior to any works on site, to minimise impacts to local and regional road networks; and
- Implement the measures to preserve and maintain local flora/fauna as set out in the Biodiversity Management Plan (**Appendix K**), and the Arboricultural Impact Assessment (**Appendix H**)

##### Operation Phase

- Implement strategies to mitigate urban heat and enhance environmental performance, in line with the ESD Report (**Appendix W**), and the Landscape Design Report & Plans (**Appendix GG**), with respect to the landscaping associated with road works and integrated water cycle management.

In relation to cumulative impacts, the proposal is located in an area that has been experiencing growth and change, which is set to continue under the Agribusiness Precinct objectives and should continue to integrate with broader planning and delivery frameworks for the Aerotropolis. This includes:

- Participation in strategic monitoring and reporting with Council, DPHI and other relevant agencies to manage cumulative growth impacts;
- Supporting delivery of infrastructure in an orderly and timely way; and
- Coordinating with nearby and concurrent development in the area to reduce cumulative impacts during the construction period.

Overall, the proposal aligns with the broader strategic vision of the Aerotropolis and Western Parkland City. It supports planned employment land use within a designated industrial precinct, responding directly to infrastructure investment in the region. In this context, the cumulative impacts are largely considered positive, with the remaining cumulative impacts across both the construction and operational phases of the project able to be suitably managed through the implementation of abovementioned mitigation measures.

#### **7.20 Air Quality**

An Air Quality Impact Assessment (AQIA) (**Appendix G**) has been prepared by SLR to uncover any potential air quality risks during the construction phase of the proposal. The assessment measures impact on surrounding landowners, businesses and sensitive receptors, as well as recommends mitigation measures to minimise effect in accordance with relevant Environment Protection Authority (EPA) guidelines.





### **7.20.1 Existing Environment**

The primary air quality concern during construction relates to fugitive dust emissions from earthworks and construction activities. The key air pollutants of interest are considered to be particulate matter from construction works, and wheel-generated dust and products of fuel combustion from operations.

Temporary elevations in local dust levels are most likely to occur when construction activities are undertaken during periods of low rainfall and/or windy conditions. The impact of elevated dust emissions is dependent upon the potential for particulates to become and remain airborne before being deposited as dust or experienced as an ambient particulate concentration.

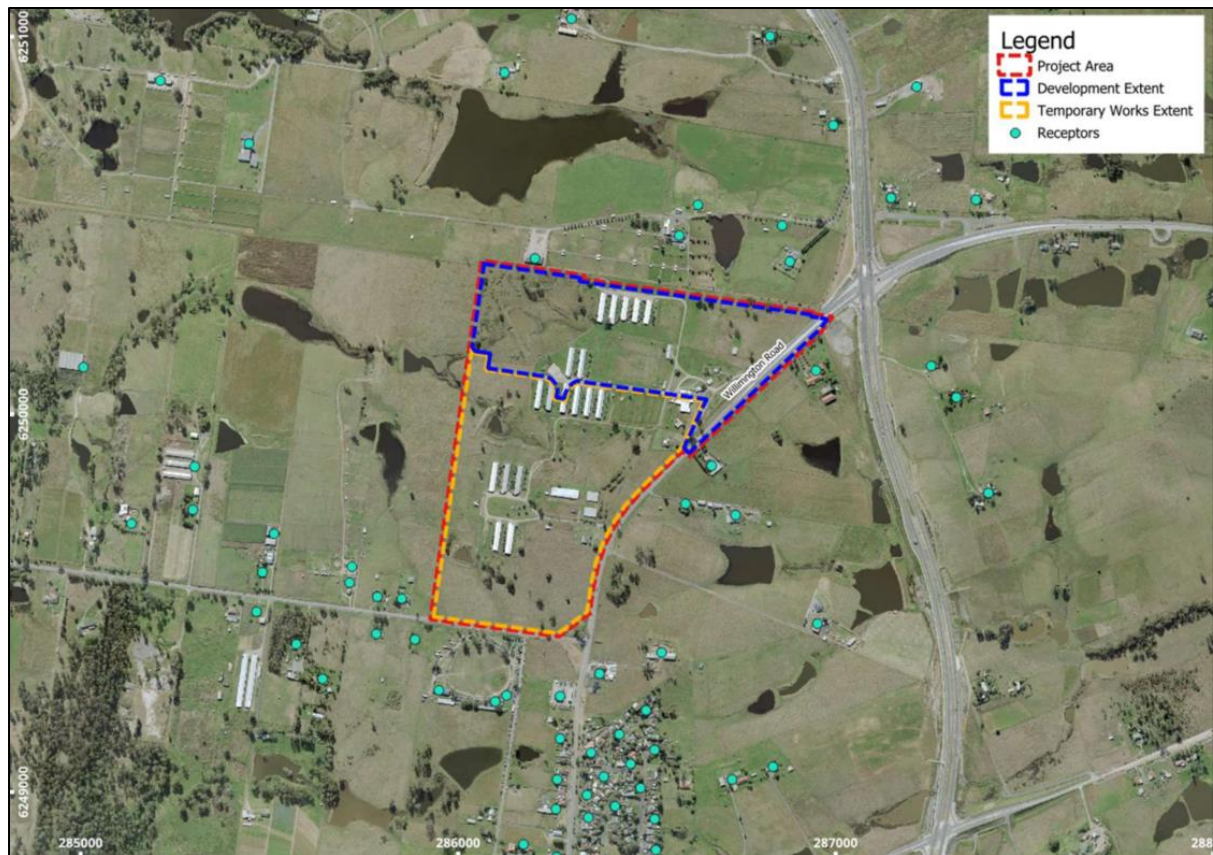
Meteorological data from a nearby weather station, located approximately 4.5km southeast of the site, measured the mean annual rainfall at 727.9mm based on rainfall statistics obtained from 1995 to 2025. Similarly, at same weather station, and based on data collected from 2020-2024, wind speeds are mostly moderate (1.5 – 5.5m/s), with occasional stronger winds, though speeds exceeding 8m/s are relatively uncommon. Calm conditions occur 8.5% of the time, suggesting that while wind movement is generally steady, there are still periods of low air circulation.

Ambient air quality monitoring data from a nearby air quality monitoring station, located approximately 6km southeast of the site, found that for the period between 2020-2024 the background air quality in the locality is generally good, with annual average concentrations well below the relevant assessment criteria under typical conditions.

### **7.20.2 Sensitive Receptors**

As shown in **Figure 39**, the closest residential receptors are concentrated to the south and southeast of the site, with some rural residences to the north and west. Commercial receptors are mainly positioned to the north and east, indicating the presence of business or industrial activities in proximity to the site, however a majority of the existing uses in the surrounding area are rural in nature.



**Figure 39. Surrounding Sensitive Receptors**

Source: SLR, 2025

### 7.20.3 Potential Impacts

A qualitative risk-based assessment has been undertaken following the Institute of Air Quality Management (IAQM) Guidance methodology, which considers:

- The scale and nature of construction works (dust emission magnitude);
- The sensitivity of the surrounding area; and
- The proximity and number of sensitive receptors.

The assessment evaluated four (4) key construction activities, being demolition, earthworks, construction and track out. Potential sources of air emissions associated with the development are summarised in **Table 29**.

**Table 29. Potential Sources of Air Emissions**

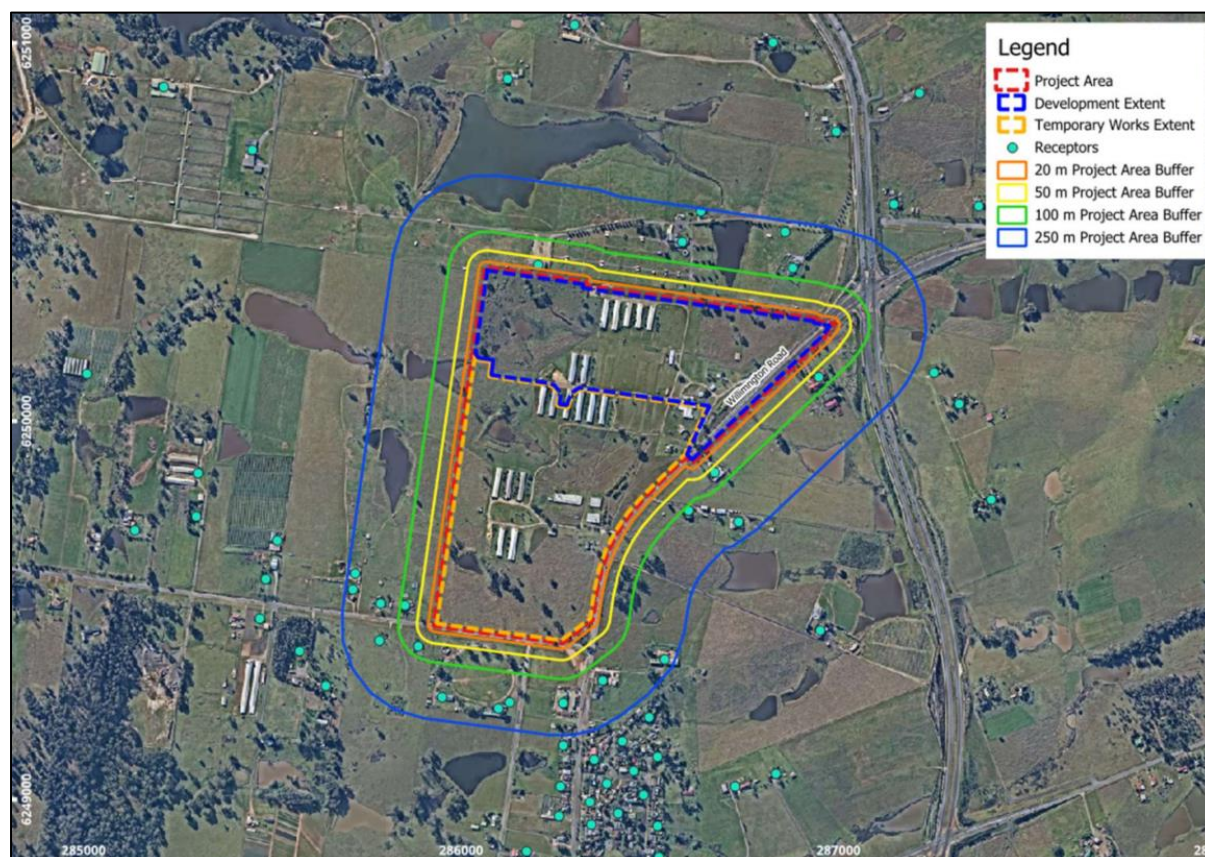
| Stage      | Sources                                                                                                                                                                                                                                                      | Dust Emission Magnitude |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| Demolition | <ul style="list-style-type: none"> <li>▪ Limited to works on Willmington Road;</li> <li>▪ Demolition, remediation, and decommissioning of the turning bay on Willmington Road; and</li> <li>▪ All other site demolition approved under DA24/0421.</li> </ul> | Small                   |
| Earthworks | <ul style="list-style-type: none"> <li>▪ Bulk and detailed earthworks, including cut and fill, benching, battering and retaining walls; and</li> <li>▪ Temporary earthworks on both residue lots (Lot 5 and Lot 6).</li> </ul>                               | Large                   |

|              |                                                                                                                                                                             |        |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Construction | <ul style="list-style-type: none"> <li>Construction works limited to road work and stormwater infrastructure.</li> </ul>                                                    | Medium |
| Track out    | <ul style="list-style-type: none"> <li>Construction traffic generation of up to 200 vehicles per day may occur at the peak of the works or 20 vehicles per hour.</li> </ul> | Large  |

It is further noted that, based on the criteria listed in the *IAQM Guidance on the Assessment of Dust from Demolition and Construction*, the sensitivity of the identified receptors in the AQIA is concluded to be high for health impacts and high for dust soiling, as they include residential areas where people may be reasonably expected to be present continuously as part of the normal pattern of land use.

**Figure 40** below illustrates the location of human receptors within the IAQM buffer distances.

**Table 30** summarises the number of receptors within such buffer distances.



**Figure 40. Sensitive Receptor Lots Within Buffer Distances**

Source: SLR, 2025

| Table 30. Number of Sensitive Receptors around Site |                                      |
|-----------------------------------------------------|--------------------------------------|
| Distance of Sensitive Receptors                     | Number of High Sensitivity Receptors |
| <20m                                                | 0                                    |
| <50m                                                | 1-10                                 |
| <100m                                               | 10-100                               |
| <250m                                               | 10-100                               |

Taking into account receptor sensitivity, density, and the five (5) year mean background  $PM_{10}$  concentration of  $15.3 \mu\text{g}/\text{m}^3$  measured from the nearby air quality monitoring station, the overall area sensitivity was classified as Low for both dust soiling and human health impacts, see **Table 31** below.



It is acknowledged that, according to the IAQM, only the highest level of area sensitivity needs to be considered.

| Table 31. Potential Sources of Air Emissions |                                     |            |              |           |
|----------------------------------------------|-------------------------------------|------------|--------------|-----------|
| Potential Impact                             | Sensitivity of the Surrounding Area |            |              |           |
|                                              | Demolition                          | Earthworks | Construction | Track out |
| Dust Soiling                                 | Low                                 | Low        | Low          | Low       |
| Human Health                                 | Low                                 | Low        | Low          | Low       |

The results indicate that if no mitigation measures were to be applied to control emissions during the construction works, there would be:

- A **low risk** of adverse dust soiling and human health impacts occurring at the off-site sensitive receptor locations during the demolition; and
- A **low risk** of adverse dust soiling and human health impacts occurring at the off-site sensitive receptor locations during the earthworks, construction, and track out.

These risk levels reflect the relatively low sensitivity of the surrounding area and the temporary nature of construction activities.

#### 7.20.4 Mitigation Measures

Despite the low risk rating, dust management measures will be implemented through a Construction Air Quality Management Plan (CAQMP) to ensure impacts remain negligible. Key measures include those summarised in **Table 32** below.

| Table 32. Potential Sources of Air Emissions |                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mitigation Measure                           | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Communications and Site Management           | <ul style="list-style-type: none"> <li>▪ Display contact details of person(s) accountable for air quality at the site boundary;</li> <li>▪ Develop and implement a Dust Management Plan (DMP);</li> <li>▪ Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures; and</li> <li>▪ Undertake daily visual inspections of dust levels.</li> </ul> |
| Dust Suppression                             | <ul style="list-style-type: none"> <li>▪ Ensure adequate water supply for dust suppression using non-potable water where practicable;</li> <li>▪ Use water-assisted dust sweepers on access roads and work areas;</li> <li>▪ Apply water suppression during demolition and earthworks operations; and</li> <li>▪ Cover, seed or fence stockpiles to prevent wind erosion.</li> </ul>                                                             |
| Vehicle and Equipment Management             | <ul style="list-style-type: none"> <li>▪ Impose and signpost maximum speed limits (24km/h on surfaced, 16km/h on unsurfaced roads);</li> <li>▪ Ensure all vehicles switch off engines when stationary;</li> <li>▪ Cover vehicles transporting materials; and</li> <li>▪ Implement wheel washing or cleaning procedures.</li> </ul>                                                                                                               |
| Works Planning                               | <ul style="list-style-type: none"> <li>▪ Plan site layout to locate dust-generating activities away from receptors;</li> <li>▪ Erect solid screens or barriers around dusty activities;</li> </ul>                                                                                                                                                                                                                                               |



|  |                                                                                                                                                                                   |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <ul style="list-style-type: none"> <li>▪ Avoid site runoff of water or mud; and</li> <li>▪ Remove materials with dust potential promptly unless being re-used on site.</li> </ul> |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

The IAQM indicates that effective mitigation typically prevents significant effects on receptors, with residual impacts normally being negligible when appropriate dust controls are implemented. Following implementation of the identified measures through a CAQMP, all four (4) identified construction activities are anticipated to result in negligible residual risks to both dust soiling and human health.

The AQIA demonstrates that construction dust emissions can be adequately managed through site-specific mitigation measures, ensuring air quality does not present a constraint to the development.

## 7.21 Ecologically Sustainable Development

The principles of Ecologically Sustainable Development (ESD) as outlined in Clause 193 of the EP&A Regulation have been carefully considered in **Section 8.1** of this EIS.

ESD a framework for achieving long-term environmental, social and economic sustainability by integrating ecological considerations into decision-making processes. An ESD Report provided at **Appendix W** details the sustainability measures, environmental initiatives and project commitments incorporated into the development.

A broad suite of ESD principles and initiatives have been embedded into the development, to minimise water consumption, reduce energy use and greenhouse gas emissions throughout design, construction and operation phases, aligning with the NSW Government's net zero emissions target by 2050. The development also demonstrates a strong commitment to Connection to Country, biodiversity enhancement and environmental stewardship.

Key sustainability initiatives to be implemented throughout the project lifecycle include:

- Integration of sustainable design and management practices during construction and operation;
- Achievement of energy performance standards that exceed baseline requirements to minimise environmental and economic impacts;
- Implementation of water conservation measures to reduce potable water demand;
- Prioritisation of environmentally preferable, low-impact materials;
- Waste minimisation through prevention, reuse, recycling and composting strategies; and
- Protection and enhancement of biodiversity values.

Based on these commitments and considerations, the proposed development can be considered to meet and exceed ESD requirements through systematic integration of sustainability principles across all project phases.

## 7.22 Planning Agreements & Development Contributions

The following contributions plans apply to the site:

- Western Sydney Aerotropolis Special Infrastructure Contribution;
- Housing and Productivity Contributions; and
- Penrith Aerotropolis Development Contributions Plan 2023.

Any required development contributions may be imposed as a condition of consent.

The Proponent wishes to enter either a Works-in-Kind (WIK) Agreement or a Voluntary Planning Agreement (VPA) with the relevant authorities for infrastructure being delivered as part of this SSD





which relate to the contribution plans above. A local planning agreement will be sought with Council and negotiations will commence imminently.

### **7.23 Waste Management**

A Waste Management Plan (WMP) has been prepared by SLR Consulting Australia to address waste generation and management during the demolition and construction phases of the development (refer to **Appendix QQ**).

The WMP identifies waste types, quantities, and management methods to ensure compliance with relevant legislative requirements and promote resource recovery in accordance with circular economy principles. Of note, the *NSW Waste and Sustainable Materials Strategy 2041* provides a target of 80% average recovery rate from all waste streams by 2030. The Precinct Plan sets more stringent targets for construction waste, including 85% reduction in construction waste to landfill by 2025 and 90% reduction in construction waste to landfill from 2026 onwards.

#### **7.23.1 Demolition and Construction Waste**

The WMP identifies the type, volume, and disposal methods for all waste materials during the demolition and construction phases, and provides site-specific operational methods including training requirements, material ordering procedures, waste avoidance strategies, and relevant site procedures.

Demolition activities are limited to removal of an asphalt driveway (1,785m<sup>2</sup>) and gravel driveway (730m<sup>2</sup>), which will be transported off-site to facilities lawfully able to accept these materials. The demolition and remediation of existing structures have been addressed under a separate development approval. The existing dam will be drained, de-sludged and backfilled under geotechnical supervision, with approximately 1,400m<sup>3</sup> of sludge requiring off-site disposal.

Construction activities will involve bulk earthworks comprising 86,300m<sup>3</sup> of cut and 97,000m<sup>3</sup> of fill, and excavation of a temporary detention basin generating 10,700m<sup>3</sup> of material. The earthworks have been designed to achieve a balanced site with no requirement to import or export excavated materials.

The WMP identifies various waste types including concrete, bricks, metals, timber, glass, insulation materials, packaging materials, and general construction waste. Each waste type has been classified according to NSW EPA Waste Classification Guidelines, with most materials classified as general solid waste (non-putrescible) suitable for recycling. Hazardous materials including asbestos will be managed in accordance with SafeWork NSW and NSW EPA requirements.

#### **7.23.2 Mitigation Measures**

The WMP establishes waste management measures based on the NSW waste management hierarchy, prioritising waste avoidance through balanced earthworks design, just-in-time material ordering, and bulk purchasing to reduce packaging waste.

All waste will be separated at source and stored in designated areas with separate bins for concrete, metals, timber, glass, excavated soil, and general waste. Storage areas will be accessible, weatherproof where required, and clearly labelled with NSW EPA approved signage.

The Site Manager will be responsible for implementing the WMP, maintaining disposal records, and ensuring regulatory compliance. All personnel will receive induction training on waste management procedures. Daily inspections and comprehensive documentation of waste quantities, contractors, and disposal facilities will be maintained for regulatory inspection. All waste will be transported by licensed contractors during approved hours to facilities lawfully able to accept each waste type.

## 8. EVALUATION

This section of the EIS provides a comprehensive evaluation of the project with regard to its economic, environmental, and social impacts, including the principles of ESD. It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposed development with the relevant controls and policies.

Various components of the biophysical, social, and economic environments, as well as the proposal's alignment with the objects of the EP&A Act and other statutory instruments applicable to the site, have been examined in this EIS and are summarised below.

### 8.1 Ecologically Sustainable Development

The four (4) principles of ESD as outlined in Clause 193 of the EP&A Regulation have been carefully considered in the formulation of this proposal. An analysis of these principles is provided below.

#### 8.1.1 Precautionary Principle

The precautionary principle is used when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, a lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential impacts in order to avoid, wherever practicable, serious, or irreversible damage to the environment.

The proposed development will not result in any threat of serious environmental damage or degradation. Matters relating to the natural environment such as biodiversity and ecology, stormwater management, and contamination have been comprehensively assessed and addressed through detailed technical studies. The proposed development incorporates water sensitive urban design principles appropriate buffer zones to sensitive areas and other mitigation measures as required to sensitives area within and surrounding the site.

The assessment in this EIS has not identified any serious threats of environmental damage that cannot be adequately mitigated or addressed based on current scientific standards and best practices. The staged development approach allows for adaptive management and monitoring to address any unforeseen issues. In this regard, the proposed development can be considered generally consistent with the precautionary principle.

#### 8.1.2 Inter-generational Equity

Intergenerational equity is concerned with ensuring that the health, diversity, and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal has been designed to benefit both existing and future generations by:

- Incorporating a range of design interventions for the purpose of achieving a sustainable development outcome as outlined at **Section 7.2** including custodial sustainability;
- Reducing energy, water, and waste to ensure that the health, diversity, and productivity of the environment are maintained for the benefit of future generations;
- Responding to a strategic need for future employment generating land;
- Incorporating sustainable urban design principles including water sensitive urban design elements and environmental sustainability;
- Preserving and enhancing corridors and open space networks to maintain ecological connectivity for future generations;
- Enhancing connections to future public transport connections to reduce reliance on private vehicle transport and supports sustainable mobility patterns;



- Establishing development guidelines that ensure future stages maintain high environmental and design standards; and
- Creating resilient infrastructure and services that can adapt to changing community needs over time.

This detailed assessment has concluded that no unreasonable use of resources, affectation of environmental processes, or prevention of the use of land for future generations would occur from the proposed development. Issues with potential long-term implications, such as stormwater management and infrastructure capacity, have been carefully planned through the staged development approach and the application of safeguards and management measures described in this EIS and the appended technical reports.

### 8.1.3 Conservation of Biological Diversity and Ecological Integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. Matters relating to biodiversity and ecology are addressed in detail in the Biodiversity Assessment at **Appendix I** and associated BDAR Waiver at **Appendix J** which confirms that the proposal will not have any unacceptable impacts on the conservation of biological diversity and ecological integrity.

### 8.1.4 Improved Valuation, Pricing and Incentive Mechanisms

The principles of improved valuation and pricing of environmental resources require consideration of all environmental resources that may be affected by a proposal, including air, water, land, and living things. The development 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 proposed mitigation measures (**Appendix D**) as required.

## 8.2 Strategic Context

The Western Parkland City is experiencing significant growth, particularly driven by major infrastructure investments by the State and Federal government in the Aerotropolis to support the emerging Western Parkland City.

The proposed development responds directly to this strategic need by providing land fit for purpose for future employment generating uses.

## 8.3 Statutory Context

The relevant State and local environmental planning instruments are identified at **Section 5** of this EIS and assessed at **Appendix B**. This assessment has demonstrated that the proposal will satisfy the applicable provisions of statutory planning instruments that apply to the site. This is summarised below:

- The proposed development has been assessed and designed to satisfy the relevant objectives of the EP&A Act, particularly relating to sustainable and orderly development;
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regulations. Refer to **Appendix A**;
- Consideration is given to the relevant matters for consideration as required under the BC Act, with biodiversity impacts appropriately assessed and managed. Refer to **Appendix I** and **Appendix J**; and
- The proposed development satisfies the relevant provisions of the Western Parkland City, the Precinct Plan and Aerotropolis DCP.

#### **8.4 EP&A Regulation**

This EIS report has addressed the specification criteria within Section 190 and 192 of the EP&A Regulation. Similarly, **Section 8.1** of the EIS has addressed the principles of ESD through the precautionary principle (and other considerations), which assesses the threats of any serious or irreversible environmental damage. No additional approvals will be necessary at this time to enable the proposed development, in accordance with Section 4.42 of the EP&A Act.

The staged development approach ensures that environmental and infrastructure impacts can be appropriately managed and monitored over time.

#### **8.5 Likely Impacts of Development**

Matters of environmental impact have been addressed extensively in **Section 7** of this EIS. Where impacts are identified, this EIS and accompanying technical reports explain why they are acceptable and how they can be mitigated. The development will not have significant impacts on any threatened flora or fauna species, with appropriate measures in place to protect retained vegetation and riparian areas.

An assessment of the likely social impacts of the proposal confirms that the proposal has the potential to result in both long-term positive and short-term negative impacts. The identified negative impacts are primarily in relation to construction activities and traffic generation during the development phases. However, these can be managed through the development of comprehensive Construction Management Plans, staged delivery allowing for monitoring and response, and carefully considered design guidelines for future development stages.

The identified positive impacts are substantial and long-term, including provision of employment and support for the broader Western Parkland City vision.

In terms of economic impact, these may only be described as positive. The proposed development will result in significant employment generation during construction phases and ongoing economic activity. The development will support the economic viability of the emerging Western Sydney Airport economic precinct.

It is considered that the recommended mitigation measures in **Appendix D** will assist the consent authority in formulating conditions to be imposed to ensure that the environmental impacts of the proposed development are suitably managed. Therefore, the proposed development will not result in adverse impacts on the site itself or the immediate locality as a result of its implementation.

#### **8.6 Suitability of the Site**

Having regard to the characteristics of the site and its location, the proposed development is suitable for the site for the reasons below:

- The site can be appropriately serviced with water, sewer, electricity, and telecommunications infrastructure to accommodate the proposed development intensity;
- The topography and natural features of the site are suitable for urban development, with existing drainage patterns able to be incorporated into the overall stormwater management strategy;
- The site can appropriately accommodate the proposed development while balancing environmental considerations, particularly through the creation of connected open space; and
- The proposal treats Lots 5 and 6 as flexible 'super lots' to adapt to the final Luddenham Village Plan, which will be subject to future development applications.

The technical assessments prepared in support of the proposal have concluded that the site can be made suitable for the proposed development.



**8.7 Public Interest**

The proposed development is in the public interest as it:

- Creates development opportunities consistent with the intended character and function of the Agribusiness Precinct;
- Establishes appropriately sized lots and configurations that support viable future agribusiness operations while optimizing infrastructure provision;
- Provides opportunities for businesses seeking strategic locations near the Western Sydney Airport;
- Meaningfully integrates Country and landscape to provide a cohesive whole of site response and a safe, secure, and active community environment for our elders;
- Includes the provision of community infrastructure that will contribute to the network of cycle/pedestrian paths and offer transport choices and connections to local community;
- Integrates the public domain with the built form through a landscape-led approach to create well-designed, permeable, and activated communal and public spaces;
- Creates opportunities for community gathering, interactions, and the generation of cultural capital associated with the delivery of communal and public areas of the development, which encourage neighbours to meet and connect;
- Provides a significant contribution to the availability and diversity of employment the Western Parkland City and has the potential to contribute to strategic policy goals at both State and local level. This benefit is enhanced by the community infrastructure offerings for future employees and visitor of the site and the wider community;
- Provides additional trees to support local and regional targets to increase tree canopy coverage;
- Is consistent with the ESD principles as defined by Section 190 of the EP&A Regulations; and
- Has undertaken an extensive program of engagement with relevant stakeholders predates the submission of this SSDA, as detailed at length within **Appendix C** and summarised in **Section 6** of this EIS.

The proposal represents a significant opportunity to deliver well-planned, sustainable development that supports both local community needs and broader strategic planning objectives for Western Sydney.





## 9. CONCLUSION

This EIS has been prepared to assess the environmental, social, and economic impacts of the proposed development at 121 Willmington Road, Luddenham. The EIS has addressed the issues outlined in the SEARs (**Appendix A**) and accords with Part 8 of the EP&A Regulation with regards to consideration of the relevant environmental planning instruments, built form, and social and environmental impacts resulting from the proposed development. Appropriate mitigation measures have been identified to manage the impacts of the development through the construction and operational phases of the project.

Having considered the detailed assessment undertaken in this EIS, the approval of this SSDA is recommended, subject to the implementation of suitable conditions of consent reflecting the recommended mitigation measures in **Appendix D**.

