

**225-245 MARTIN ROAD BRADFELD
BULK EARTHWORKS, REHABILITATION & QUARRYING
AVIATION IMPACT ASSESSMENT**

For Goodman Property Services (Aust) Pty Ltd

SSD-97711727

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Executive Summary

This Aviation Impact Assessment has been prepared by L+R Airport Consulting to address the site-specific Secretary's Environmental Assessment Requirements (SEARs) received in respect of the proposed State Significant Development Application (SSDA) No. 97711727. The proposed development includes Rehabilitation, Quarrying and Bulk Earthworks and is being undertaken by Goodman Property Services (Aust) Pty Ltd (Applicant) on behalf of Goodman Western Sydney Pty Limited as trustee for the Goodman Western Sydney Trust (Owner). The development is located at 225 – 245 Martin Road, Bradfield, 2556 (the Site).

It is important to note that a number of the proposed activities being sought for approval under this SSDA have previously been assessed and approved under MP10_0014. The existing DA relates to approximately 70Ha of Net Developable Area (NDA), with the new portion of site approx. 36ha NDA. Cumulatively the area is approx. 116ha NDA.

This report further outlines this in **Section 1.1**.

The assessment has been carried out with consideration of:

- National Airports Safeguarding Framework Guidelines A through I
- State Environmental Planning Policy (Precincts – Western Parkland City) 2021
- Western Sydney Aerotropolis Precinct Plan 11 July 2025
- Western Sydney Aerotropolis Development Control Plan 2022 September 2024
- Western Sydney Airport – Airport Plan September 2021
- Aviation Safeguarding Guidelines - Western Sydney Aerotropolis and surrounding areas November 2022
- WSI Airport Preliminary Draft Master Plan 2025-45
- The Planning Secretary's Environmental Assessment Requirements (SEARs)
- Civil Aviation Safety Authority (CASA) Advice (CASA Ref: F24/42421-38)
- Western Sydney International Airport (WSI) Advice dated 11 November 2025

The proposed Bulk Earthworks, Rehabilitation & Quarrying, as provided, is in accordance with the WSI Airport Safeguarding Guidelines and is summarised as follows:

- **Wildlife hazards:** The site is located within wildlife management Area A (0-3km). Stormwater infrastructure and detention basins have been designed and assessed by others to meet the requirements of the Sydney Water 2021 *Stormwater and Water Cycle Management Study*. As per WSI advice provided on 2 June 2025, compliance with this Sydney Water 2021 study will satisfy WSI regarding wildlife hazards.
- **Building generated windshear and turbulence:** The proposal is solely for site preparation works and does not include buildings, retaining walls, or other infrastructure as detailed in **Section 2**. Therefore, building generated windshear and turbulence according to NASF Guideline B are not applicable.

- **Lighting in the vicinity of an airport:** The site is mainly within the 6 km radius and will be subject to the provisions of Regulation 94 of the Civil Aviation Regulations 1988 (CAR1988), which allows CASA to require lights that could cause confusion, distraction, or glare to pilots in the air, to be extinguished or modified. The northwestern part of the site falls within the primary light control Zone D. The bulk earthworks, rehabilitation, and quarrying activities will be conducted between 7am and 6pm, Monday to Saturday. No work will be carried out on Sundays or Public Holidays. No permanent lighting is planned. Any temporary lighting used will adhere to the requirements of WSI, the SEPP Section 4.21, and the CASA Part 139 (Aerodromes) Manual of Standards 2019 Section 9.144 for zone D where applicable.
- **Protected airspace:** The site is within the lateral extents of the OLS inner horizontal surface at 126.0 m AHD. PANS-OPS airspace protections are not yet published for the airport. The PANS-OPS is likely to be above the OLS. The proposed construction equipment, at a maximum elevation of 93.2 m AHD, will remain below the protected airspace.
- **Communication, navigation and surveillance facilities:** The site is outside the glide path BRA as published in the Parkland City SEPP. The site is outside the lateral extents for the Runway 05L and Runway 23R localiser Cat II/III BRA. The site is located partially within the future Runway 23L localiser Cat II/III BRA and outside the future Runway 05R localiser. However, this construction work is to be undertaken before the second Runway is operational.
- **Strategically important helicopter landing sites:** The site is beyond 3.5 km from surrounding hospitals (Nepean Hospital, Mt Druitt Hospital, Blacktown Hospital and Liverpool Hospital). The WSI Safeguarding Guidelines also indicate there are no surrounding hospitals within 3.5 km of WSI, nor are there plans for any new hospitals.
- **Public safety areas:** The site is beyond the lateral extents of the WSI Public Safety Areas as defined by the SEPP, the Airport Plan 2021 and the WSI pdMP.

1. Introduction

L+R Airport Consulting was engaged by Goodman Property Services (Aust) Pty Limited (Goodman) to conduct an aviation impact assessment for the proposed Bulk Earthworks at 225–245 Martin Road, Bradfield (the Site) in accordance with the relevant National Airports Safeguarding Framework (NASF) Guidelines, as they pertain to the Western Sydney International (Nancy-Bird Walton) Airport (WSI). The *225-245 Martin Road, Bradfield Bulk Earthworks, Rehabilitation and Quarrying* Revision C by Arcadis was provided for assessment.

This SSDA seeks approval for the following;

- Site Preparation works only (i.e no buildings, retaining walls or other infrastructure works)
- Rehabilitation of areas disturbed by historic mining and brick-making operations under major project approval MP10_0014 and MP10_0033.
- Bulk Earthworks to the site to align with the Connecting to Country and Precinct Plan principles including both the disturbed and undisturbed portions to capture the following proposed works:
 - Rehabilitation of Pits 1 & 2 using predominantly on-site fill (Engineered fill import required).
 - Preparation of the remaining site area to Bulk Earthwork Levels (BEL) (not including detailed trimming) for the proposed industrial development as considered under SSDA 97688711.
- Quarrying and Export of Bringelly Shale and Clay from select areas of Pit 1 & 2 to rectify the previous approved pit designs to ensure they are geotechnically stable to suit the proposed industrial masterplan.
- Vegetation Removal of 6.97 Ha over land that is not certified under the Growth Centre SEPP.
 - Species being cleared involve species protected under both the BC Act and EPBC Act.
 - EPBC Act Referral completed on a precautionary measure given small amount of EMBC listed communities.
- Demolition of any remaining structures on the site.
- Rehabilitation of identified and unidentified contamination and, if required, the construction of a containment cell in the proposed northeastern corner of the site (currently identified as Lot 55 of DP 3050). The containment cell is proposed to trigger Designated Development threshold due to the proposed upper limit storage volume of 100,000m³.
- Relocation of the Jemena Gas main predominantly burdening Lot 3 of DP127878.0
- If required through an Aboriginal Cultural Heritage Assessment Report (ACHAR), relocation and reburial of artefacts.

Additionally, this SSDA application seeks to rely on already existing authority approvals issued under MP10_0014 (subject to any applicable modifications). These are as follows:

- Mining Lease 1771
- Environmental Protection Licence 684
- Ground Water Access Licence WAL24346
- Ground Water Supply Works Approval No. 10WA109463

The SEARs application, no. SSD-97711727, identifies key issues, including airport safeguarding. The Planning Secretary's Environmental Assessment Requirements (SSD-97711727) issued on 26 November 2025 require the following airport safeguarding matters to be addressed as shown in the **Table 1** below. Relevant agencies were invited to provide input to the SEARs for the proposal including any key issues and assessment requirements as shown in **Table 2** below.

Table 1: SEARs Compliance

Section	Request Item	Section Reference	Page Reference
Airport Safeguarding	Aviation Impact Assessment including:		
	▪ An assessment of the potential impact of the proposed development on the Western Sydney Internal (Nancy-Bird Walton) Airport (WSI) operations	Sections 4 to 10	Pages 13 to 23
	▪ A wildlife hazard assessment and wildlife management plan	Section 4	Page 13
	▪ Consideration of related matters in the <i>Aviation Safeguarding Guidelines - Western Sydney Aerotropolis and surrounding areas</i> , State Environmental Planning Policy (Precincts – Western City Parkland) 2021 and the National Airports Safeguarding Framework, including (but not limited to) public safety, wildlife hazards, lighting, windshear, turbulence and the prescribed airspace; and	Sections 4 to 10	Pages 13 to 23
	▪ Consideration of section 4.23 of the State Environment Planning Policy (Precincts – Western City Parkland) 2021	Sections 4 to 10	Pages 13 to 23

Table 2: Agency Advice

Agency	Comment	Section Reference	Page Reference
CASA	Airport Safeguarding Assessment – Specifically, the following:		
	▪ Wildlife: Bird hazards (should be controlled as much as practical)	Section 4	Page 13
	▪ Height: Construction equipment	Section 7	Page 17
	▪ Dust Suppression: Dust over aircraft movement, aircraft parking and aircraft maintenance areas should be avoided	Section 7.3	Page 18
WSI	The following matters are addressed in the EIS:		
	▪ Aviation Impact Assessment that considers the ultimate development of WSI and that address Part 4.3 of the State Environmental Planning Policy (Precincts – Western Parkland City) 2021 and the Aerotropolis Development Control Plan (DCP)	Sections 4 to 10	Pages 13 to 23
	▪ The aviation impact assessment is to consider:		
	- Lighting – an assessment of external lighting needs to be included in the aviation impact assessment, to demonstrate that the proposed lighting at the site is acceptable from an aviation perspective. It should be noted that this assessment would also need to be undertaken in regard to construction lighting.	Section 6	Page 15
	- Windshear and Turbulence – A windshear assessment will be required as the site/part of the site is within the assessment area. The application should demonstrate the proposed development does not penetrate the 1:35 surface plane. National Airports Safeguarding Framework – Guideline B Managing the risk of Building Generated Windshear and Turbulence at Airports provides guidance on assessment requirements.	Section 5	Page 14
	- Prescribed Airspace – Detail should be provided to ensure that the proposal will not interfere with the protected airspace of WSI, this also includes any crane use during construction	Section 7	Page 17

Agency	Comment	Section Reference	Page Reference
	A Traffic Impact Assessment	Provided by Others (Ason Group)	
	Consideration of any impacts to the WSI-owned land adjoining the site in relation to stormwater runoff/flooding, water quality, odour, air quality and noise.	Provided by Others (Colliers & SLR)	

1.1. Related Applications/Activities

SSDA 97688711 – 14 warehouse buildings, Active Open Space & amenities precinct (including a café) and internal site infrastructure works

The SSDA seeks approval for the construction, fit-out (including office and standard warehouse racking) and operation of 14 warehouse buildings, Active Open Space & amenities precinct (including a café) and internal site infrastructure works.

This application assumes the bulk earthworks are completed under SSDA 97711727 (this application).

Part 5 Activity – External Works Lead in Roads and Services

The Applicant is proposing access to the Site via the following route which will be upgraded to be in accordance with the Precinct Plan.

- Part 1 - Martin Road / Elizabeth Drive intersection upgrades
 - It is expected that these works will be approved by way of amendment to the existing Part 5 approval by Transport for New South Wales (‘TfNSW’).
 - It is understood that Transport for NSW will construct the work with a target completion date of December 2029.
- Part 2-4 - Martin Road / East West Collector Road / Lawson Road Upgrades
 - Further to Part 1, access to the site is proposed to be constructed concurrently as follows:
 - Part 2 – Access from the Martin Road / Elizabeth Drive intersection will continue down Martin Road and join the future East / West Collector road identified within the Precinct Plan through Lot 36 DP 3050.
 - > The portion of road between the Intersection and future East / West Collector road will be upgraded with a temporary access strategy that is consistent with Condition DS5 of the Precinct Plan.
 - Part 3 – The East / West Collector road through Lot 36 DP 3050 is proposed to be delivered in ultimate form consistent with the Precinct Plan, connecting Martin Road and Lawson Road;
 - Part 4 – From the East / West Collector Road connection on Lawson Road, the portion of Lawson Road South through to the Site will be upgraded in ultimate form consistent with the Precinct Plan.
 - It is expected that these works are completed by December 2029, based on a commencement date of June 2028.

It is the Applicant's expectation that the above-mentioned works (Part 1-4) are completed prior to the receipt of the first building Occupation Certificate (expected December 2029).

Notwithstanding the above, the Applicant notes that access to the site under SSD 97711727 will continue to be via Martin Road based on the intersection upgrades completed under MP10_0014.

2. The Site

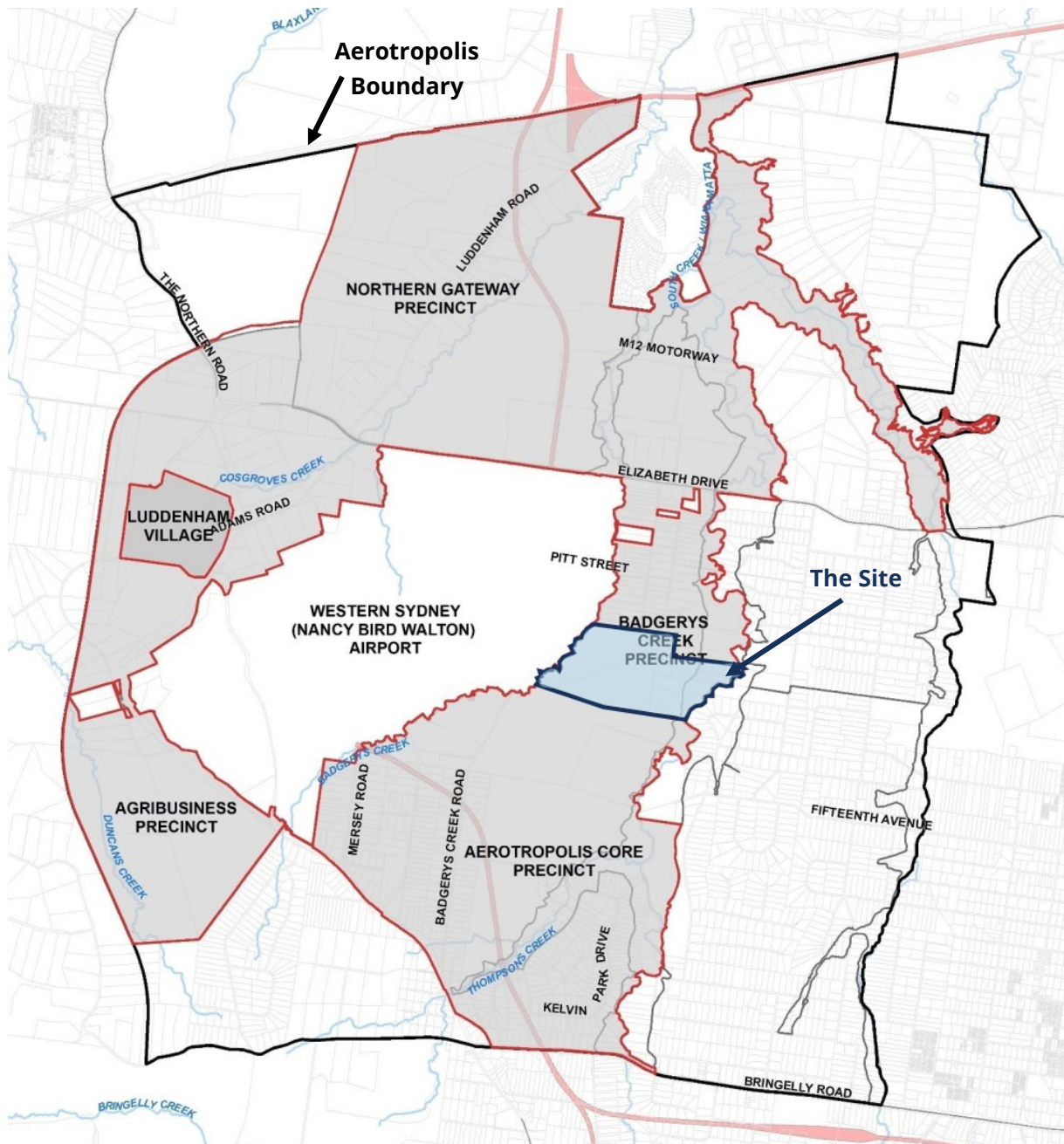
The Site is situated within the Western Sydney International (Nancy-Bird Walton) Airport (WSI) Aerotropolis Boundary, adjacent to the WSI Airport Boundary as shown in Figure 1 below. The equipment required for the Bulk Earthworks includes, but not limited to, the following:

- 12 t to 50 t excavators, maximum reach approximately 11 m
- 45 t dump trucks, maximum height approximately 8 m
- Dozers (D6 to D9), maximum height approximately 6 m
- Compactors, maximum height approximately 6 m
- Rollers, maximum height approximately 4 to 5 m
- Mobile crushers, maximum height approximately 6 m
- Mobile screens, maximum height approximately 6 m
- Graders, maximum height approximately 6 m
- Loaders, maximum reach approximately 11 m
- Skid steers, maximum reach approximately 6 m

Additional equipment may be required, but it will not exceed 25 metres above the ground.

Based on the Arcadis Earthworks Site Sections Sheets 1 to 9 Revision C, the highest point of the rehabilitation surface reaches 68.2 m AHD. The maximum elevation for the proposed equipment is therefore 93.2 m AHD (the highest equipment at 25 metres above ground plus the maximum ground elevation of 68.2 m AHD).

Figure 1: WSI Aerotropolis Boundary



Source: Department of Planning, Housing and Infrastructure *Western Sydney Aerotropolis Development Control Plan 2022* September 2024

3. Legislation & Guidelines

3.1. National Airports Safeguarding Framework

The National Airports Safeguarding Framework (NASF) is a national land use planning framework that aims to:

- Improve community amenity by minimising aircraft noise-sensitive developments near airports, including through the use of additional noise metrics and improved noise-disclosure mechanisms; and
- Improve safety outcomes by ensuring aviation safety requirements are recognised in land use planning decisions through guidelines adopted by jurisdictions on various safety-related issues.

The National Airports Safeguarding Advisory Group (NASAG), comprising of Commonwealth, State and Territory Government planning and transport officials, the Australian Government Department of Defence, the Civil Aviation Safety Authority (CASA), Airservices Australia, and the Australian Local Government Association (ALGA), has developed the National Airports Safeguarding Framework.

Commonwealth, State and Territory Ministers considered NASF at the Standing Council on Transport and Infrastructure meeting on 18 May 2012. The agreement signifies a collective commitment from governments to ensure that an appropriate balance between the social, economic, and environmental needs of the community and the effective use of airport sites. In 2019, a NASF Implementation Review was conducted. During this review, the NSW government stated that it does not support Guideline A as it is not deemed superior to the existing policy of the Department, which relies on the ANEF contour and the Australian Standard.

The agreement signifies a collective commitment by Governments to maintain an appropriate balance between the social, economic, and environmental needs of the community and the effective utilisation of airport sites.

The NASF currently comprises nine (9) Guidelines, which are available at www.infrastructure.gov.au.

3.2. NSW State Environment Planning Policy

The NSW State Environmental Planning Policy (Precincts – Western Parkland City) 2021, Part 4.3 Development controls – Airport safeguards (Parkland City SEPP), contains development controls related to Western Sydney International Airport (WSI). The development controls for Airport safeguards are shown on maps accessible through the NSW Planning Spatial Viewer.¹

3.3. Western Sydney Aerotropolis Precinct Plan

The NSW Department of Planning, Housing and Infrastructure Western Sydney Aerotropolis Precinct Plan September 2024 (Aerotropolis Precinct Plan) outlines the place-based objectives and requirements to

¹ <https://www.planningportal.nsw.gov.au/spatialviewer/>

guide development in the Aerotropolis, providing more detail to support the land use zoning and other provisions of the Parkland City SEPP.

3.4. Western Sydney Aerotropolis Development Control Plan

The NSW Department of Planning, Housing and Infrastructure Western Sydney Aerotropolis Development Control Plan 2022, effective September 2024 (Aerotropolis DCP), outlines the planning, design, and environmental objectives that guide the preparation and assessment of Development Applications (DAs) and Masterplans. The objectives and controls in the Aerotropolis DCP complement those outlined in Chapter 4 of the Parkland City SEPP and the Aerotropolis Precinct Plan.

3.5. Western Sydney Airport – Airport Plan

The Western Sydney Airport – Airport Plan / September 2021 (Airport Plan) outlines the vision for the development and operation of WSI. The Airport Plan includes details of the concept design, indicative airport layout, zoning, and safeguarding information such as Australian Noise Exposure Concept (ANEC) contours and Obstacle Limitation Surfaces (OLS).

3.6. Western Sydney Airport Safeguarding

The Aviation Safeguarding Guidelines - Western Sydney Aerotropolis and Surrounding Areas November 2022 (WSI Safeguarding Guidelines) provide a consolidated set of aviation safeguarding planning standards for WSI, utilising a single data source.

WSI has also created an online aviation safeguarding mapping tool that interprets some of the planning protection overlays mentioned in the SEPP and can be accessed at <https://olstool.wsa.geoplex.net.au/>. These controls include:

- Obstacle Limitation Surfaces (OLS);
- Glide Path (Building Restricted Area)
- Public Safety Area
- Wildlife Buffer Zones
- ANEC Noise Contours
- Lighting Intensity Zones
- Windshear Assessment Zone

3.7. WSI Airport Preliminary Draft Master Plan 2025-2045

The WSI Airport Preliminary Draft Master Plan 2025–2045 (WSI pdMP), as required under the Airports Act, was released in September 2025. The WSI pdMP was on public exhibition until September 2025. The WSI pdMP, based on single runway operations, includes an airport environment strategy, a Draft 2045 ANEC, a 20-year airport development plan, and airport planning frameworks including safeguarding. The final draft Master Plan was submitted to the Minister for review and approval at the end of November 2025, with the final master plan expected in 2026.

4. Wildlife Hazards

NASF Guideline C provides guidance to Commonwealth, state/territory, and local government decision-makers, as well as airports, in reducing the risk of strikes between wildlife and aircraft by managing wildlife-attracting land uses near airports. This framework has been incorporated into the Parkland City SEPP, Aerotropolis DCP, and the Aerotropolis Precinct Plan.

The objective of the Parkland City SEPP Section 4.19 Wildlife hazards is to regulate development on land around the Airport where wildlife might pose a risk to airport operations. Wildlife buffer zones are mapped to manage development near WSI's runways, aiming to reduce wildlife hazard risks. These zones, also known as Wildlife Management Areas, include Area A (0-3km), Area B (3-8km), and Area C (8-13 km). The Site, adjacent to the WSI Airport Boundary as shown in Figure 1, falls within Wildlife Management Area A (0-3km).

The Arcadis drawing no MAR-AAP-DA-R02-DRG-CI-0171/Rev C shows several temporary sediment basins. Under the Parkland City SEPP and the Aerotropolis DCP, temporary sediment basins are not prohibited. However, as discussed on 2 June 2025 with WSI, where the project complies with the Sydney Water 2021 *Stormwater and Water Cycle Management Study* this will satisfy WSI in relation to wildlife hazards.

5. Building Generated Windshear and Turbulence

NASF Guideline B is to assist land use planners and airport operators in their planning and development processes to reduce the risk of building generated windshear and turbulence at airports near runways.

Applicability of this Guideline is initially determined by the location of a **building** within the assessment trigger area around the runway, that is:

- 1,200 m or closer perpendicular to the runway centreline;
- 900 m or closer in front of the runway threshold; and
- 500 m closer from the runway threshold along the runway.

The proposed Bulk Earthworks is site preparation works only and does not include buildings, retaining walls or other infrastructure works as described in **Section 1.1**. As such, building generated windshear and turbulence as per NASF Guideline B is not applicable.

6. Lighting in the Vicinity of an Airport

The SEPP Section 4.21 *Lighting* objective is to safeguard airport operations from the risk of lighting and reflectivity distractions for pilots.

NASF Guideline E offers advice on the risk of distractions to pilots from lighting and light fixtures near airports. It provides guidance for designers and installation contractors when installing lights within a 6 km radius of a known aerodrome, measured from the centre point of each runway.

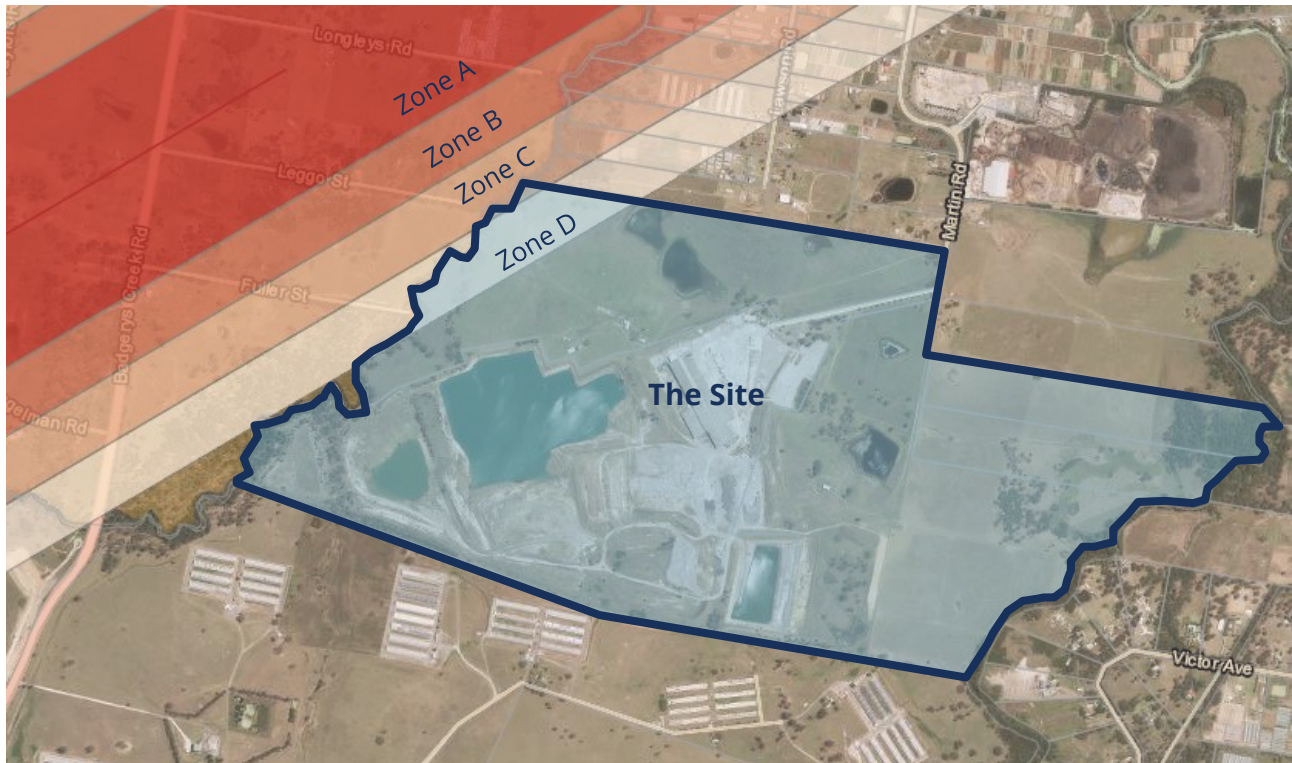
The CASA Part 139 (Aerodromes) Manual of Standards 2019 Section 9.144: Lights – requirements for zones sets out the restrictions and degree of interference ground lights may cause as a pilot approaches, offering guidance to lighting suppliers on general requirements. The primary area is divided into four light control zones: A, B, C, and D. These zones indicate the extent of interference ground lights can create for pilots during approach.

The westernmost part of the site is in light control zone D, as shown in **Figure 2**. Most of the site lies outside the primary area but within the 6 km radius of WSI. According to the Parkland City SEPP 4.21 Lighting Section (2), lighting within 6 km of WSI requires consultation with the relevant Commonwealth authority for the installation and operation of external lighting related to construction works that could be intrusive or cause light spill outside the land where the works occur. Additionally, the Civil Aviation Safety Authority (CASA) may require lights that could cause confusion, distraction, or glare to pilots in the air to be extinguished or adjusted, as per Regulation 94 of the Civil Aviation Regulations 1988 (CAR1988).

The bulk earthworks, rehabilitation, and quarrying will occur between 7 am and 6 pm from Monday to Saturday. No work will be undertaken on Sundays and Public Holidays. No permanent lighting is planned on site. Any temporary lighting will comply with the requirements of WSI, the SEPP Section 4.21, and the CASA Part 139 (Aerodromes) Manual of Standards 2019 Section 9.144, especially the light control zone D, which allows 450 cd measured at 3 degrees above the horizontal where appropriate.

Glare from reflective surfaces can also distract pilots. Solar panels, in particular, may cause glare or reflectivity that affects aircraft during various stages of flight and ATC operations. If solar panel arrays are to be used at any stage during the Bulk Earthworks program, the proponent might need to conduct a solar glare hazard assessment to show WSI and CASA that aircraft and ATC safety will not be compromised.

Figure 2: Primary Light Control Zones



Source: <https://www.wsiairport.com.au/airport-safeguarding-tool>

7. Protected Airspace

NASF Guideline F is intended to address the issue of intrusions into the operational airspace of airports by tall structures, such as buildings, construction equipment such as cranes and drill rigs or activities that could cause air turbulence affecting aircraft in flight. As a leased federal airport, WSI airspace is protected under the *Airports (Protection of Airspace) Regulations 1996* (Cth.).

7.1. Obstacle Limitation Surfaces (OLS)

The Obstacle Limitation Surfaces (OLS) are established as the protection for aircraft operating on visual flight procedures. The OLS comprises a series of virtual surfaces around a runway that define the height limits for obstacles affecting air navigation within and around an airport. Obstacles include fixed (whether temporary or permanent) and mobile objects, structural parts of such objects, and structures such as roof access ladders, antennas, rooftop plant and equipment, emissions from stacks or vents where the upward vertical velocity exceeds 4.3 m/s at the emission point, cranes, mobile cranes, and concrete pumps.

The Site falls within the lateral extents of the WSI OLS identified in the SEPP Obstacle Limitation Surface Map and depicted below in **Figure 3**. The critical OLS surface over the site is the OLS inner horizontal surface at 125.5 m AHD.

In June 2023 a revised OLS was declared, due to changes in the runway elevations and runway design and is reflected on the WSI Airport Safeguarding Tool. This revision means the OLS inner horizontal surface, within which the Site remains, is 126.0 m AHD.

Proposed Bulk Earthworks equipment at a maximum elevation of 93.2 m AHD will remain below the WSI OLS limit of 126.0 m AHD.

7.2. PANS-OPS Airspace

PANS-OPS airspace is associated with instrument flight procedures and other requirements for aircraft operating under Instrument Flight Rules, such as will be the case for the majority of Western Sydney Airport aircraft operations. Flight procedures and the respective PANS-OPS airspace protection are not yet published for the airport.

Since WSI is expected to become operational in 2026, the proposal should be submitted to WSI for review and to obtain an update on the availability of PANS-OPS. However, it is anticipated that at the Site location, the OLS will provide sufficient planning protection for the required airspace for instrument flight procedures at WSI.

Erosion & Sediment Control Notes No 5:

At all times a water cart(s) shall be maintained on site to:

- a) water the areas of hydromulch*
- b) control dust*

Watering of mulch, dust or vegetation must be kept to the minimum required to achieve specified outcomes. In no case shall areas be overwatered to saturation or to the point where water ponds on the surface.

In addition, SLR's Air Quality Impact Assessment 19 December 2025 addresses the potential for off-site dust/particulate matter impacts during the bulk earthworks and was assessed in accordance with the NSW EPA Approved Methods. SLR concludes that

...with an appropriate ambient air quality monitoring plan and TARP in place, as well as greenhouse gas reduction strategies, the proposed construction activities can be completed without any significant impact on the surrounding receptors.

We would anticipate that the above notes and mitigations, as per the SLR Assessment, made in relation to the potential for impacts outside the boundaries of the site, would satisfy CASA's comments regarding dust over aircraft movement, aircraft parking, and aircraft maintenance areas, which are approximately 2 km southeast of the closest part of the aircraft movement areas.

8. Communication, Navigation and Surveillance Facilities

The purpose of NASF Guideline G is to formalise the protection of CNS facilities in land use planning decisions. This Guideline offers land use planning guidance to better safeguard CNS facilities that support the systems and processes established by various agencies to safely manage the flow of aircraft into, out of, and across Australian airspace. The Guideline also outlines procedures to ensure that activities within Building Restricted Areas (BRA) of CNS facilities do not negatively impact the facility or cause interference for air traffic controllers or aircraft in transit.

The objective of the Parkland City SEPP Section 4.23A Operation of Certain Air Transport Facilities is to regulate development that may affect the operation of air transport facilities. A Building Restricted Area Map is provided to ensure that development in these areas does not adversely impact the operation of communication and air traffic control facilities or structures related to the airport.

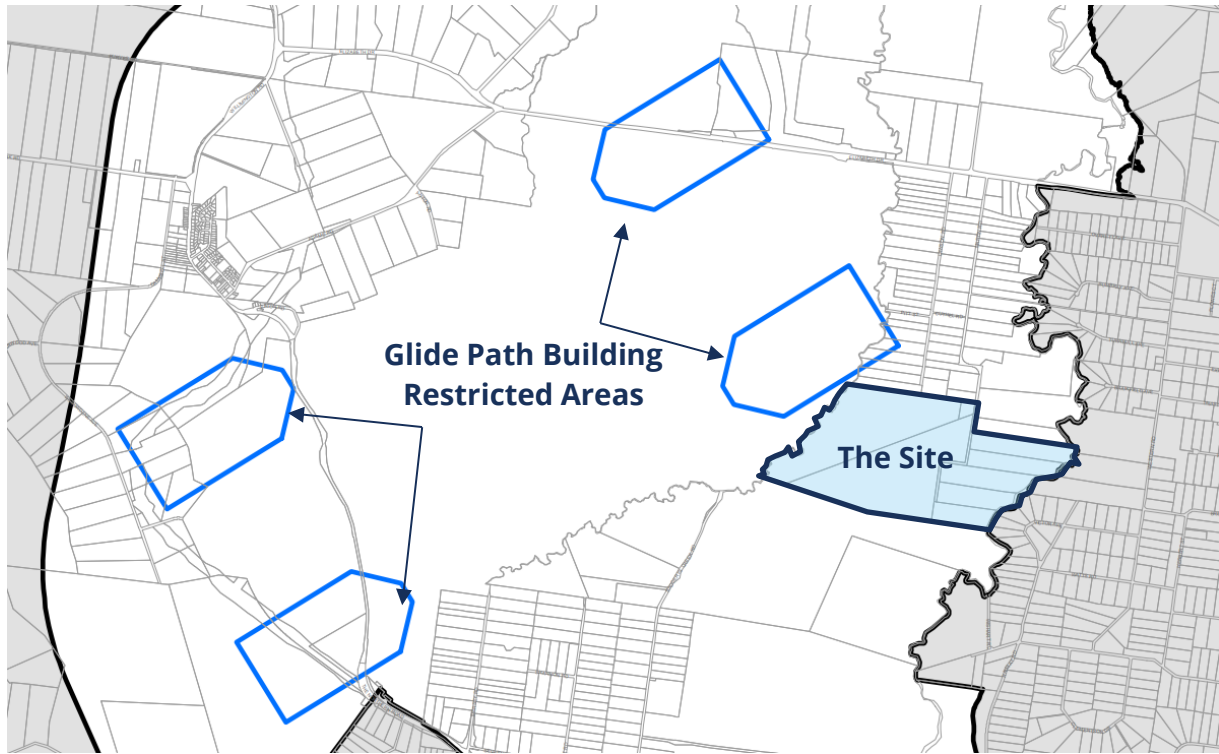
The site is outside the glide path Building Restricted Areas, as shown below in **Figure 4**.

Discussions between Goodman and WSI have also indicated that, in addition to the Glide Path BRA provided in the SEPP map, the localiser BRA should also be reviewed. Localiser antennae positions are illustrated on the ARUP Airport Site Layout – 82 MAP (supporting Document) drawing no WSA40-OveArup-00010-AP-DRG-100067/Issue A.

The WSI Stage 1 Development (single runway operations) includes Runway 05L/23R. The site lies outside the lateral extents of the Runway 05L and Runway 23R localiser Cat II/III BRA as shown in **Figure 5** below.

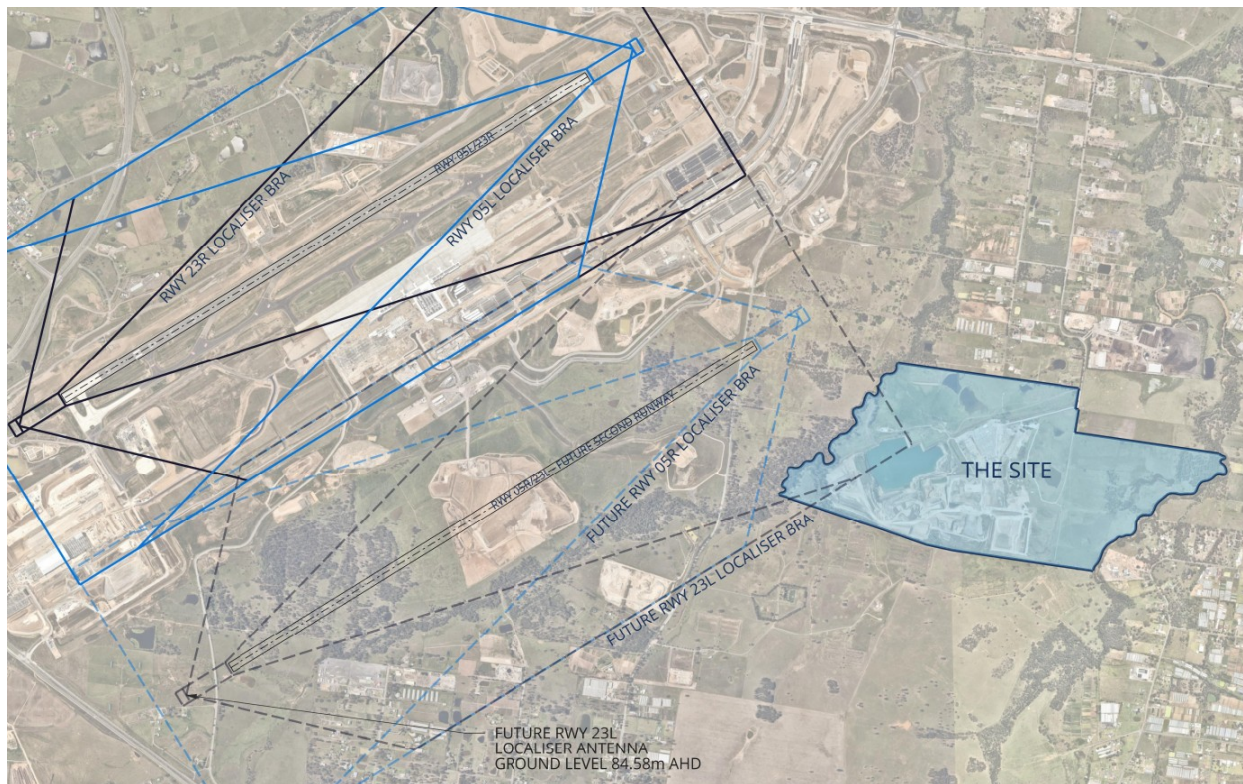
As the WSI demand necessitates, anticipated around 2050, a second, parallel runway is expected. The site is partially located within the future Runway 23L localiser Cat II/III BRA, as shown in **Figure 5** below, and outside the future Runway 05R localiser. Nevertheless, this proposal for Bulk Earthworks on the site is to be carried out and will be completed prior to the second runway becoming operational.

Figure 4: Glide Path Building Restricted Areas



Source: NSW SEPP_WPC_AER_BRA_001_20220218

Figure 5: Localiser Building Restricted Areas



9. Strategically Important Helicopter Landing Sites

NASF Guideline H provides guidance to state/territory and local government decision makers as well as the owners/operators of identified strategically important Helicopter Landing Sites (SHLS) for the ongoing operations and to ensure SHLS are not compromised by any proposed development. For the purposes of this Guideline, an SHLS is an area not located on an aerodrome.

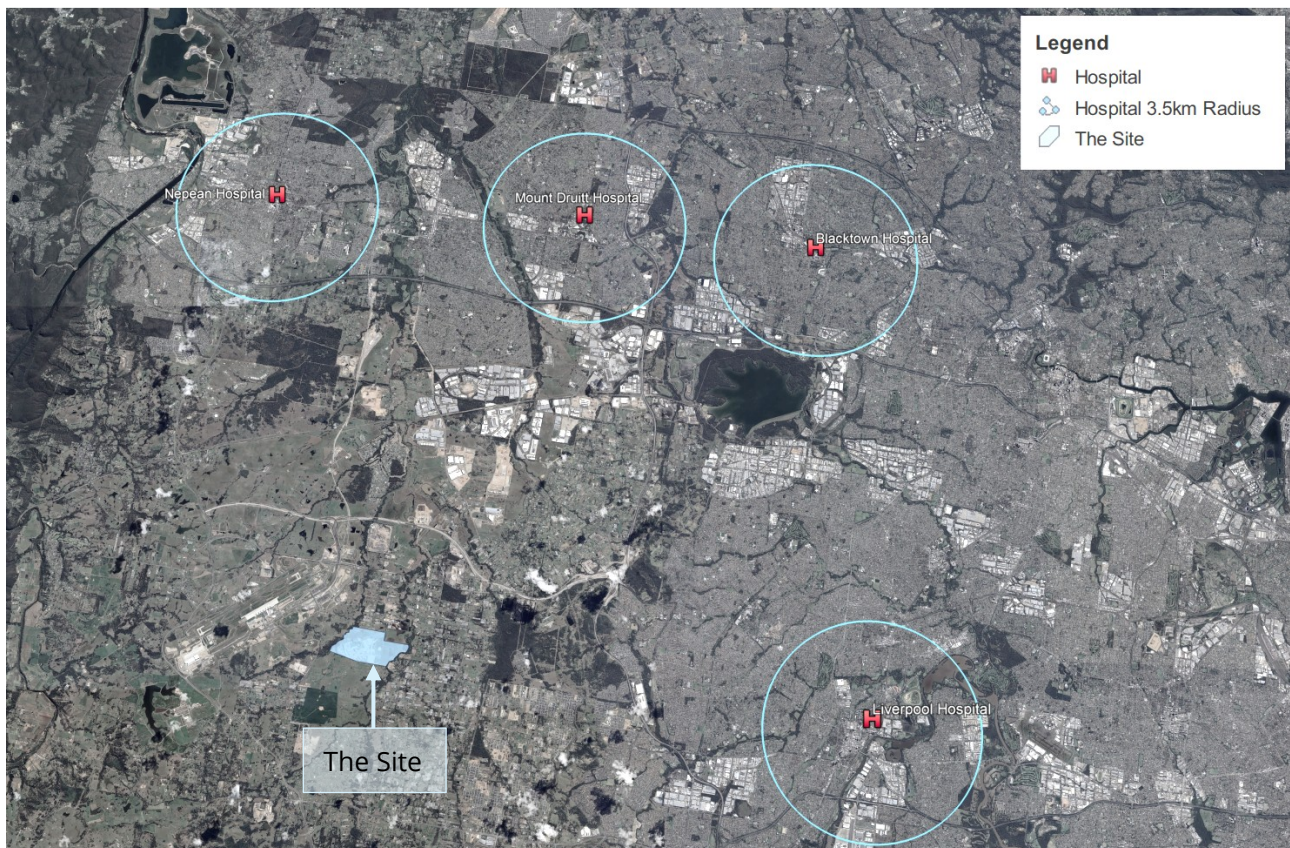
A SHLS is that as identified as being of strategic importance as well as associated with a hospital, elevated in a populated area and/or subject to instrument flight procedures. The flight path protection areas extend 3.5 km from the SHLS.

WSI Safeguarding Guidelines Section 9.4 states that:

NSW Health have indicated that there are no plans for any new hospitals within the Aerotropolis. In addition, no surrounding hospitals (Nepean Hospital, Mt Druitt Hospital, Blacktown Hospital and Liverpool Hospital) are within 3.5 km of WSI.

The site is not within 3.5 km of these existing hospitals as illustrated below on **Figure 6**.

Figure 6: Surrounding Hospitals



Source: Google Earth Pro

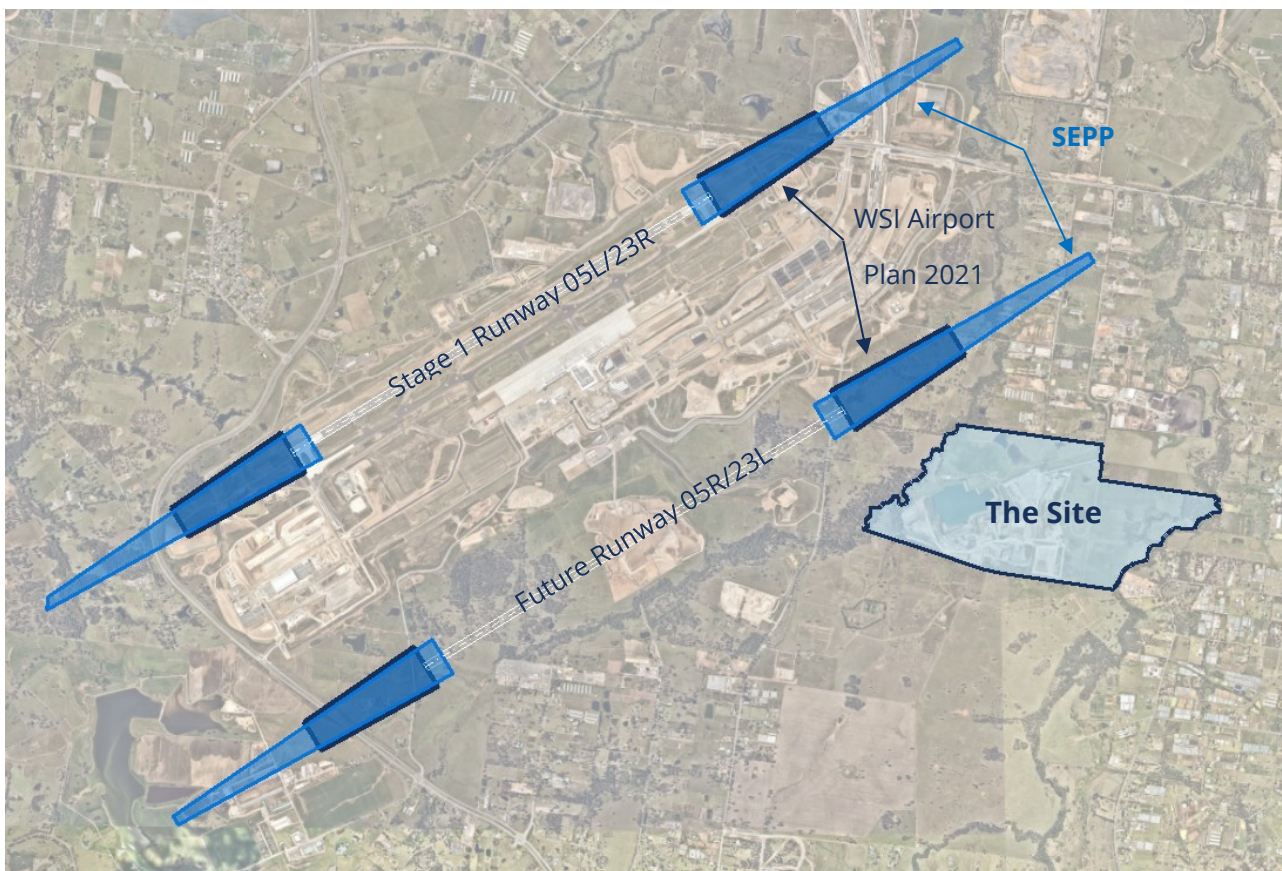
10. Public Safety Areas

NASF Guideline 1 provides guidance on approaches for the application of Public Safety Areas (PSA) planning framework in Australian jurisdictions. The Guideline is intended to ensure there is no increase in risk from new development and assist land-use planners to better consider public safety when assessing development proposals, rezoning and the development of strategic land use plans.

The Parkland City SEPP and the Airport Plan define PSAs for WSI. The WSI pdMP includes the mapped PSAs as per the Parkland City SEPP.

The site is outside the WSI PSAs as illustrated below on **Figure 7**.

Figure 7: Public Safety Areas



11. Conclusion

The proposed bulk earthworks at 225–245 Martin Road, Bradfield has been assessed for potential impacts on the ultimate development of the Western Sydney Internal (Nancy-Bird Walton) Airport (WSI) operations. The assessment has been conducted with consideration to the:

- National Airports Safeguarding Framework Guidelines A through I
- State Environmental Planning Policy (Precincts – Western Parkland City) 2021
- Western Sydney Aerotropolis Precinct Plan 11 July 2025
- Western Sydney Aerotropolis Development Control Plan 2022 September 2024
- Western Sydney Airport – Airport Plan September 2021
- Aviation Safeguarding Guidelines - Western Sydney Aerotropolis and surrounding areas November 2022
- WSI Airport Preliminary Draft Master Plan 2025-45
- The Planning Secretary's Environmental Assessment Requirements (SEARs)
- Civil Aviation Safety Authority (CASA) Advice (CASA Ref: F24/42421-38)
- Western Sydney International Airport (WSI) Advice dated 11 November 2025

The proposed Bulk Earthworks, Rehabilitation & Quarrying, as provided, is in accordance with the WSI Airport Safeguarding Guidelines and is summarised as follows:

- **Wildlife hazards:** The site is located within wildlife management Area A (0-3km). Stormwater infrastructure and detention basins have been designed and assessed by others to meet the requirements of the Sydney Water 2021 *Stormwater and Water Cycle Management Study*. As per WSI advice provided on 2 June 2025, compliance with this Sydney Water 2021 study will satisfy WSI regarding wildlife hazards.
- **Building generated windshear and turbulence:** The proposal is solely for site preparation works and does not include buildings, retaining walls, or other infrastructure as detailed in **Section 2**. Therefore, building generated windshear and turbulence according to NASF Guideline B are not applicable.
- **Lighting in the vicinity of an airport:** The site is mainly within the 6 km radius and will be subject to the provisions of Regulation 94 of the Civil Aviation Regulations 1988 (CAR1988), which allows CASA to require lights that could cause confusion, distraction, or glare to pilots in the air, to be extinguished or modified. The northwestern part of the site falls within the primary light control Zone D. The bulk earthworks, rehabilitation, and quarrying activities will be conducted between 7am and 6pm, Monday to Saturday. No work will be carried out on Sundays or Public Holidays. No permanent lighting is planned. Any temporary lighting used will adhere to the requirements of WSI, the SEPP Section 4.21, and the CASA Part 139 (Aerodromes) Manual of Standards 2019 Section 9.144 for zone D where applicable.
- **Protected airspace:** The site is within the lateral extents of the OLS inner horizontal surface at 126.0 m AHD. PANS-OPS airspace protections are not yet published for the airport. The PANS-OPS is

likely to be above the OLS. The proposed construction equipment, at a maximum elevation of 93.2 m AHD, will remain below the protected airspace.

- **Communication, navigation and surveillance facilities:** The site is outside the glide path BRA as published in the Parkland City SEPP. The site is outside the lateral extents for the Runway 05L and Runway 23R localiser Cat II/III BRA. The site is located partially within the future Runway 23L localiser Cat II/III BRA and outside the future Runway 05R localiser. However, this construction work is to be undertaken before the second Runway is operational.
- **Strategically important helicopter landing sites:** The site is beyond 3.5 km from surrounding hospitals (Nepean Hospital, Mt Druitt Hospital, Blacktown Hospital and Liverpool Hospital). The WSI Safeguarding Guidelines also indicate there are no surrounding hospitals within 3.5 km of WSI, nor are there plans for any new hospitals.
- **Public safety areas:** The site is beyond the lateral extents of the WSI Public Safety Areas as defined by the SEPP, the Airport Plan 2021 and the WSI pdMP.