



225-245 Martin Road, Bradfield Rehabilitation, Quarrying and Bulk Earthworks – SSD 97711727 Land Use Conflict Risk Assessment and Biosecurity Management Plan



225-245 Martin Road, Bradfield
Rehabilitation, Quarrying and Bulk Earthworks
- SSD 97711727
Land Use Conflict Risk Assessment and
Biosecurity Management Plan

Prepared for Goodman Property Services (Aust) Pty Ltd
by



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Executive Summary

This Land Use Conflict Risk Assessment and Biosecurity Management Plan has been prepared by Edge Land Planning 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).

This SSDA seeks approval for the following:

- Site Preparation works only.
- Rehabilitation of areas disturbed by historic mining and brick-making operations.
- 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 6.97Ha 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 EPBC 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.
- 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

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.

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.

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 Applicants 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.

Cumulatively, these three applications together, seek to facilitate the development of a new industrial estate at the Site.

This Land Use Conflict and Biosecurity Risk Assessment has been prepared by Edge Land Planning to accompany a State Significant Development Application (SSDA) for rehabilitation, quarrying and bulk earthworks 235-245 Martin Road, Badgerys Creek.

This report concludes that there is not likely to be any land use conflict or biosecurity risks associated with the development of the subject land for the following reasons:

- the changing nature of the surrounding land use to enterprise uses, and
- the impact of the future road pattern on the existing intensive agricultural uses.

Therefore, proposed development is suitable and warrants approval.

Chapter 1: Introduction

1.1 Introduction

This Land Use Conflict Risk Assessment and Biosecurity Management Plan has been prepared by Edge Land Planning 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 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).

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- Relocation of the Jemena Gas main predominantly burdening Lot 3 of DP127878.
- 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
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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.

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It is the Applicants 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.

This Land Use Conflict Risk Assessment and Biosecurity Management Plan has been prepared to support and inform an SSDA being prepared for the proposed development

This report has been prepared in accordance with and includes the following:

- A Land Use Conflict Risk Assessment prepared in accordance with the Department of Primary Industry (DPI) Land Use Conflict Risk Assessment Guide 2011.
- An assessment of biosecurity risks that outlines the likely risks to plants, animals, and the community and details of any proposed mitigation measures in accordance with the DIP's Managing Biosecurity Risks in Land Use Planning and Development Guider (2020).

The preparation of a LUCRA is defined in the *Land Use Conflict Risk Assessment Guide* and relates to the interaction between agricultural and non-agricultural land uses and is as follows:

Land Use Conflict Risk Assessment (LUCRA) is a system to identify and assess the potential for land use conflict to occur between neighbouring land uses. It helps land managers and consent authorities assess the possibility for and potential level of future land use conflict. (NSW Department of Primary Industries, 2011).

Biosecurity is important because of the need to protect the economy, environment and community from the following:

- pests' animals and weeds,
- diseases and things that may spread diseases
- risks arising from inappropriate stock foods or fertilisers
- contaminants that may cause animals or plants to become chemically affected
- risks caused by bees and non-indigenous animals.

The NSW Department of Primary Industries have produced a document titled *Managing Biosecurity Risks in Land Use Planning and Development Guide* (NSW Department of Primary Industries, 2020). This document will aid with the assessment of the biosecurity risks of the proposed development.

The aim of this report is to:

1. Document the physical constraints of the land.
2. Identify the surrounding land uses.
3. Assess the impact of the proposed rehabilitation, quarrying and bulk earthworks on the surrounding land uses.
4. Identify and assess the potential land use conflicts and biosecurity risks associated with the proposed rehabilitation, quarrying and bulk earthworks.

1.2 Location and Study Area

The key features of the Site are as follows:

Description	Site Detail
Land Configuration	▪ Lot 1 DP 1278780 ▪ Lot 2 DP 1278780 ▪ Lot 3 DP 1278780 ▪ Lot 55 DP 3050 ▪ Lot 56 DP 3050 Note (1) – The above lots do not include the works proposed to be included under External Lead In works.
Existing land use(s)	The Site is a Quarry and Brick Making Facility. The structures and hardstand areas used for the quarry operations are located in the central portion of the Site, connected by an internal road network. In addition, three pits are located along the southern and southeast portion of the Site.
Surrounding Land Use	Surrounding land uses include: ▪ North: Land to the north is predominantly characterised by a mix of rural, agricultural, landscape industries and, residential properties accessed by Lawson and Martin Roads. It is noted that several sites are subject to existing SSDAs for industrial / warehouse developments. Both Martin and Lawson Roads intersect with Elizabeth Drive, a major Arterial Road that provides access to the WSI site and the broader regional road network including the M7, Northern Road and the future M12. ▪ South: The land to the south is currently rural however is subject to the IPG Master Plan which was approved on 11 July 2025. The approved Master Plan covers 184 hectares and aims to support over 12,400 jobs. Inghams Property Group has allocated around 625,467 sqm for employment space, focusing on advanced manufacturing, logistics, and

	community services. The plan includes a mix of industrial and commercial zones, a local centre, and accessible public green spaces near the Western Sydney International Airport. ▪ Further to the south-west of the, is Bradfield City Centre, a 114-hectare planned urban development adjacent to Western Sydney International Airport. Designed to be a hub for innovation, advanced industries, and economic growth, it has the potential to create 20,000 jobs and provide 10,000 homes, including affordable housing. The Bradfield City Master Plan prioritises sustainability, integrating green spaces, climate-resilient infrastructure, and a commitment to achieving net-zero emissions. ▪ East: Further east of the Wianamatta-South Creek which bounds the site, is the suburb of Kemps Creek. This land is characterised by a mix of open space, rural, agricultural, emerging urban development, and residential properties that are non-initial precincts under the WSAP but intended for employment generating uses ▪ West: To the immediate west of the Site, bound by Badgerys Creek, is Western Sydney International Airport (WSI). Located in Badgerys Creek, WSI is a major federal infrastructure project designed to accommodate Sydney's future aviation needs. Set to commence operations in 2026, WSI will initially handle 10 million passengers annually and operate 24/7. Badgerys Creek Road also travels in a north-south direction to the west of the site. It provides a north-south connection between Elizabeth Drive and the Northern Road.
Site Access and road network	The Site is currently accessible from Martin Road which is located at the north-eastern boundary. The ultimate access to the site is in accordance with the proposed design via separate Part 5 Approvals with Transport for New South Wales and Liverpool City Council

Map 1 shows the site and surrounding land.



Map 1: Study Area and Surrounding Land

1.3 Planning Secretary's Environmental Assessment Requirements

The Planning Secretary's Environmental Assessment Requirements (SEARS) were issued on 24 November 2025 but there was no requirement for a Land Use Conflict Risk Assessment nor a Biosecurity Management Plan, as was required for the Internal Works associated SSDA. Goodman Property Services contacted the Department of Primary Industries and Regional Development Agriculture and Biosecurity (DPIRDAB) at the request of the Department of Planning, Housing and Infrastructure and a response was received noting that this SSDA was not referred to the DPIRDAB and that only the Fisheries division received the referral. It was stated that Biosecurity measures should be considered but not a Land Use Conflict Risk Assessment (LUCRA).

It was decided that the LUCRA would be addressed because the E&A Regulations require the EIS to address the reasons why the development should be approved, having regard to the suitability of the site with respect to potential land use conflicts with existing and future surrounding land uses.

1.4 Methodology

This report has been prepared in accordance with the two following documents prepared by the NSW Department of Primary Industries.:

1. Land Use Risk Assessment Guide
2. Managing Biosecurity Risks in Land Use Planning and Development Guide

It has used a combination of primary and secondary data gathering.

The steps in the preparation of the LUCRA, as provided in the Guide are set out below.

Step 1: Gather Information

1. Describe the nature of the land use change and development proposed on the subject land.
2. Describe the land use of the surrounding landscape to the subject land.
3. Appraise the topography, climate and natural features of the subject land and broader locality.
4. Conduct a site inspection.
5. Describe and record the main activities of the proposed agricultural land use and their regularity, including periodic and seasonal activities that have the potential to be a source of complaint or conflict.
6. Compare and contrast the proposed and adjoining / surrounding land uses and activities for incompatibility and conflict issues.

Step 2: Evaluate the Risk Level of each Activity

1. Prepare a risk assessment matrix.
2. Assess the environmental, public health and amenity impacts according to the probability of occurrence, and the consequence of the impact.

Step 3: Identify Risk Reduction Management Strategies

1. Identify management strategies and responses for each activity.
2. Prioritise Strategies.
3. Prepare performance targets for each activity.

Step 4: Record the Results of the LUCRA

Summarise:

- (a) The key issues.
- (b) Their risk level.
- (c) Recommended Management Strategies.

The Biosecurity Management Guide is not as prescriptive as the LUCRA and is based on the proposal and its impact on the surrounding land uses. Step 1 for the LUCRA will be used for both parts and then a separate Biosecurity Assessment will be made.

Chapter 2: Gather Information

2.1 Introduction

This chapter deals with the information gathering component of the assessment.

It discusses the following:

1. Nature of the land use change
2. Land use of the surrounding area
3. Topography
4. Natural features
5. Climate

2.2 Nature of the Land Use Change

This SSDA is for site preparation works only for the proposed use of the land for an industrial estate containing 14 warehouse buildings, Active Open Space & amenities precinct (including a café) and internal site infrastructure works, as has been outlined in Section 1.1. It does not propose any building, retaining walls or other infrastructure works. It includes the rehabilitation of areas disturbed by historic mining and brick-making operations, as well as remediation and bulk earthworks across other areas of the site to make the site suitable for intended future land use. The proposed application also seeks approval for demolition of any remaining structures on the Site.

Access to the site will be via Martin Road.

This SSDA is due to commence in the fourth quarter of 2026 and finish in the fourth quarter of 2029. Dust suppression will be carried out during construction (as documented in the Air Quality and Odour Report) and once each pad is complete it will be stabilised with a polymer spray until each building is commenced.

The land use of the subject land is extractive industry and extensive agriculture. The features of the site can be seen from Map 2 which is an aerial image and shows the extent of the quarrying and extensive agriculture use, which is to the north and east of the quarry.

The land use of the locality is in a state of flux and there are several sites to the north of the subject land in both Martin and Lawson Roads which are currently being developed or are the subject of SSDAs. In addition, there is a proposed road network which will have an impact on the subject land and its development. These sites and the future Road Network are shown on Map 3.



Map 2: Aerial Image of Site



Map 3: Development Sites and Future Road Network

2.3 Zoning

The zoning of the subject land is ENT Enterprise and ENZ Environment and Recreation Zone on the eastern and western boundaries under the provisions of State Environmental Planning Policy (Precincts—Western Parkland City) 2021.

The objectives of the ENT zone are as follows:

- To encourage employment and businesses related to professional services, high technology, aviation, logistics, food production and processing, health, education and creative industries.
- To provide a range of employment uses (including aerospace and defence industries) that are compatible with future technology and work arrangements.
- To encourage development that promotes the efficient use of resources, through waste minimisation, recycling and re-use.
- To ensure an appropriate transition from non-urban land uses and environmental conservation areas in surrounding areas to employment uses in the zone.
- To prevent development that is not compatible with or that may detract from the future commercial uses of the land.
- To provide facilities and services to meet the needs of businesses and workers.

The objectives of the ENZ zone are as follows:

- To protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values.
- To protect the ecological, scenic and recreation values of waterways, including Wianamatta–South Creek and its tributaries.
- To provide a range of recreational settings and activities and compatible land uses.
- To protect and conserve the environment, including threatened and other species of native fauna and flora and their habitats, areas of high biodiversity significance and ecological communities.

The ENT zone is known as an 'open' zone which lists a limited number of prohibited land uses and permits all others with development consent. This provides for the most flexibility in future land uses.

2.4 Land Use

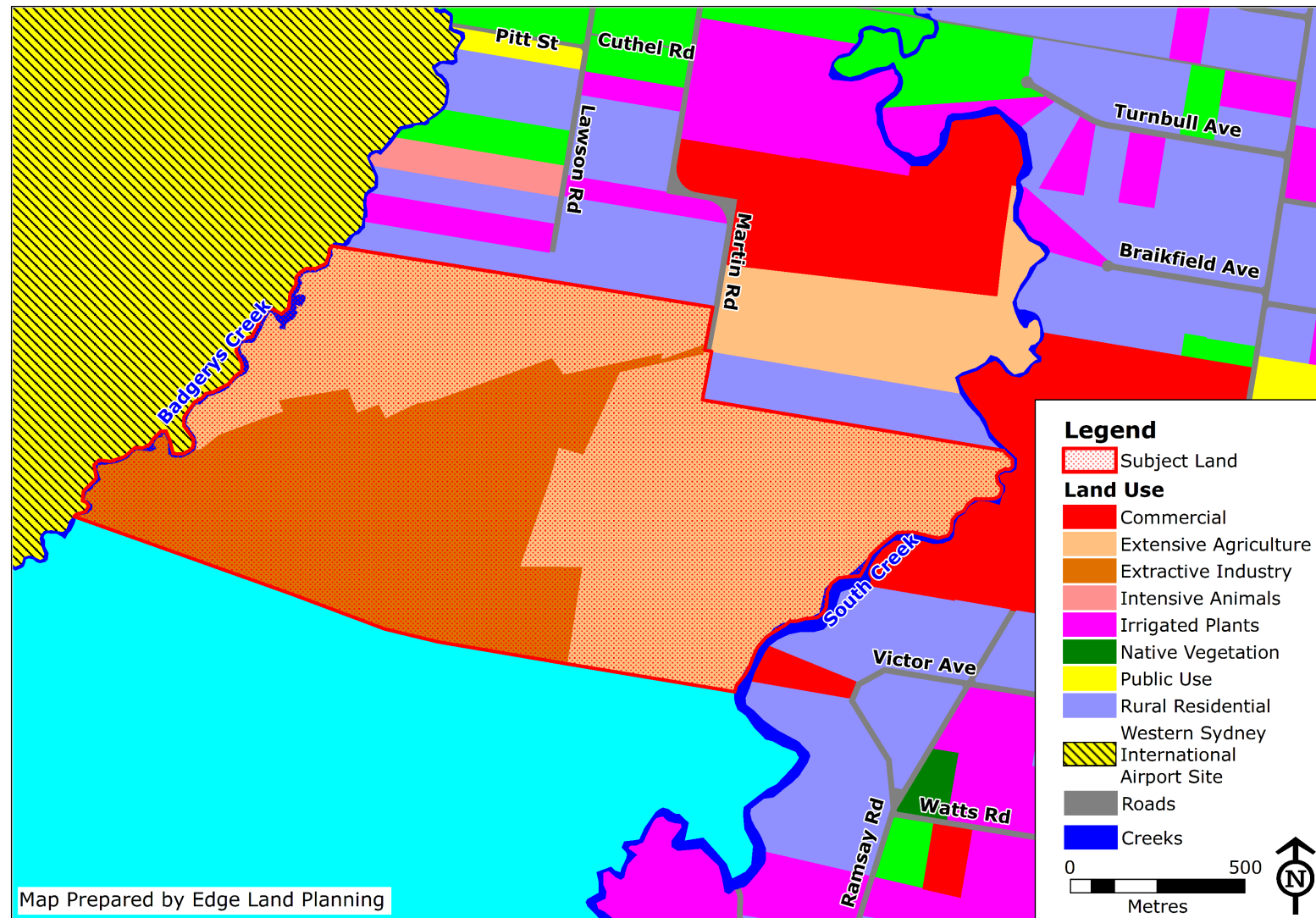
The land use of the subject land is extractive industry and extensive agriculture. Map 2 shows an aerial image of the subject land and the former quarry site is in the middle lower part of the site and the land to the north and east is being used as extensive agriculture grazing of cattle by a local grazier under licence to the current owner.

The land use of the land surrounding the study area can be seen from Map 4. The land use survey methodology and definitions can be seen from Appendix 1. The land surrounding the site has the following uses:

- Rural Residential uses immediately adjoining the site which have access to Lawson Rd and one having access to Martin Rd.
- Irrigated plant uses on the western side of Lawson Rd growing hydroponic lettuces in the open which is approximately 80m from the northern boundary of the subject land.
- Intensive Animal Use growing ducks on the western side of Lawson Rd which is approximately 245m from the northern boundary.
- Irrigated plant use growing hydroponic lettuces in the open which is 240m from the northern boundary.
- The land to the south is the former Inghams Poultry farm which has now been decommissioned and the sheds removed. It is now being redeveloped into industrial and so its use is now an urban use. A Master Plan has been approved for the site to develop it for Enterprise and Light Industrial land use. The redevelopment of this land has commenced with SSDAs being lodged for industrial uses.
- The land to the west of the subject land is the Badgerys Creek Airport Site.

The zoning of the land and the wide range of permitted uses anticipates a range of employment generating uses which will be very different from the current uses, and as can be seen from Map 4, is currently in the process of redevelopment. It is anticipated that the future land use will be like the current application and will not resemble the current land use at all.

The presence of agriculture near rural residential and urban development can result in a loss of amenity by these residents as a result of noise, odour, dust, and visual pollution from the agriculture, which they find incompatible with their use of the land for residential use. These residents will often make complaints as a result of these ongoing amenity issues, thus causing rural land use conflict (Sinclair & Bunker, 2012). Industrial development can also have an impact on nearby agricultural land uses via pollution and potential spread of pathogens. However, the changing nature of the surrounding land use as well as the zoning and proximity of the subject land to Western Sydney Airport, suggests that there is not likely to be any land use conflict between the agricultural land use to the north and the use of the subject land as an industrial estate, mainly because it is anticipated that the agricultural land use will be replaced by industrial uses within the next five years as the Airport opens and becomes operational in October this year.



Map 4: Land Use

2.5 Topography, Natural Features and Climate

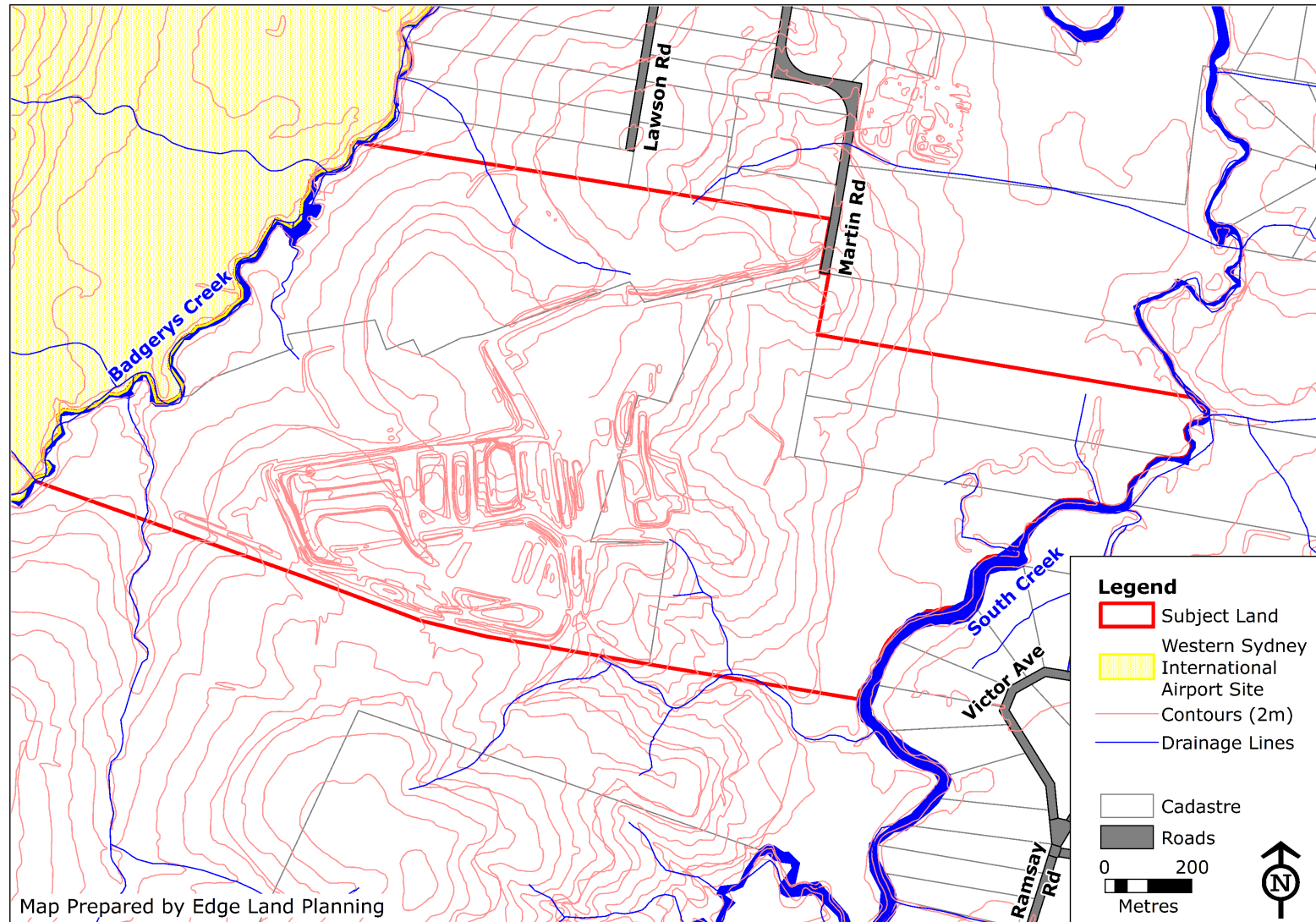
The topography and natural features of the site can be seen from Map 5.

The land has been modified by the historical quarrying activities, and it sits on a low ridgeline running through the middle of the site and has a gradual slope to towards South Creek / Wianamatta on the east and Badgerys Creek to the west. It ranges in height from 64m AHD to 46m at South Creek / Wianamatta and 54m at Badgerys Creek. which is also the western boundary. Lawson Rd slopes to the north with a 4m height variation along the frontage of the land.

The land is mostly cleared of native vegetation with some scattered trees throughout the land as well as some along South Creek / Wianamatta and Badgerys Creek.

The site is in the western part of Sydney's Peri-Urban area. This area has as climate which is described by the Bureau of Meteorology (BoM) as being warm temperate which has been defined as having warm summers and cool winters with four distinct seasons. Rainfall is mostly in the spring and summer.(Australian Government Bureau of Meterology, 2024).

The climate averages for the Badgerys Creek Automatic Weather Station (which is the closest to the subject land) is presented as Figure 1.



Map 5: Topography and Drainage

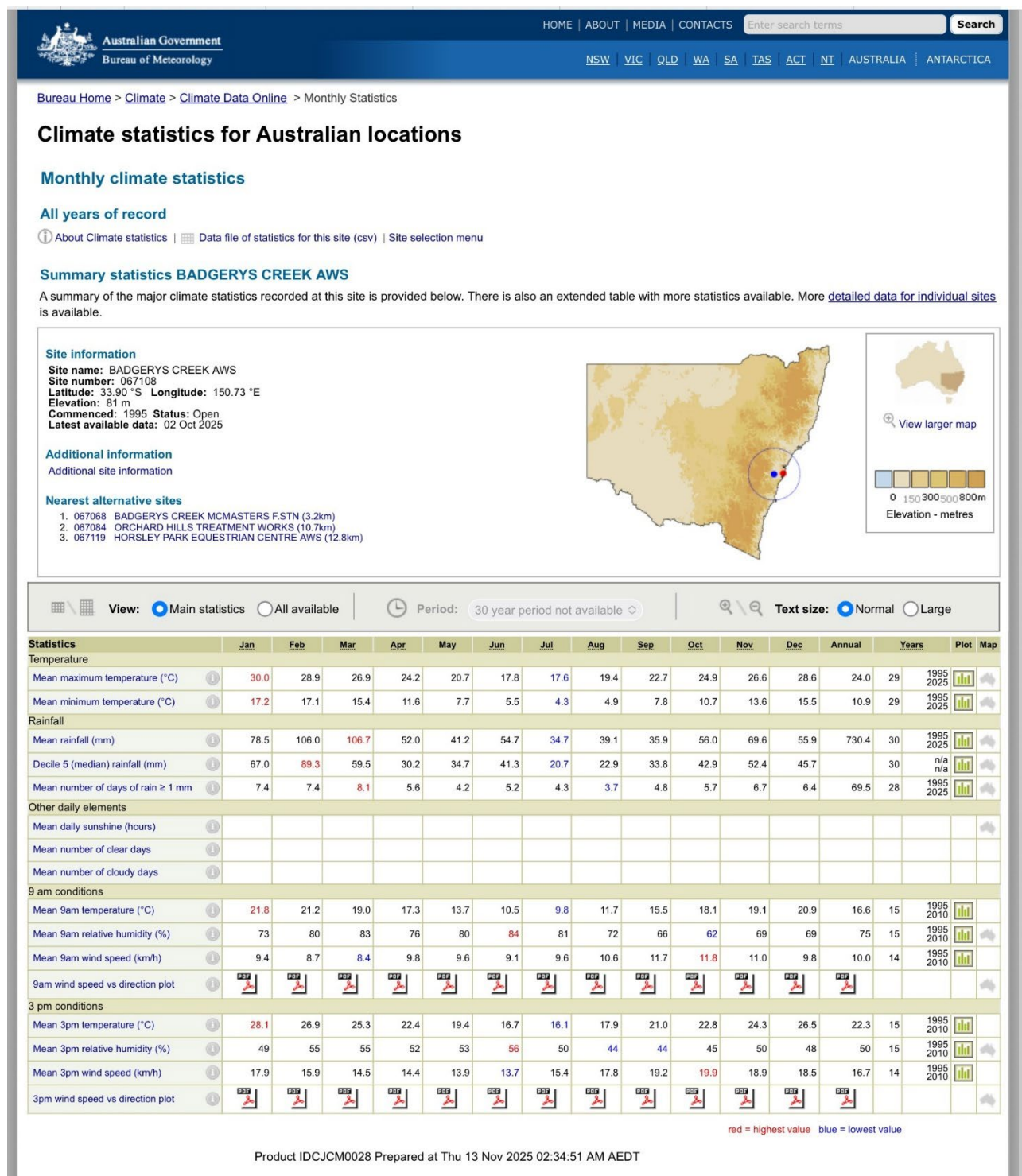


Figure 1: Climate Data for Badgerys Creek Weather Station

Source: (Australian Government Bureau of Meterology, 2025)

2.6 Site Inspection

A site inspection was carried out of the subject land on 30 May 2025. This involved driving around the site and observing the proximity to the neighbouring properties. The neighbouring properties were also driven by to assess the land use of each of them.

2.7 Consultation with Neighbouring Residents

The land use survey and site inspection showed that there are three intensive agricultural uses in Lawson Rd north of the subject land which would be impacted by the proposed development because of traffic travelling along Lawson Road as follows and which are shown on Map 6:

1. Market Garden 80m on western side of Lawson Rd – Number 245.
2. Poultry Farm Ducks 245m on western side of Lawson Rd – Number 225.
3. Market Garden 240m on eastern side of Lawson Rd – Number 190.

The client was unable to provide names and contact details for these land uses and so the names and addresses of the owners was found by conducting a title search using one of the NSW Land Registry brokers. A set of questions was prepared to be asked of each farmer, and a copy of these questions is provided as Appendix 2. The duck farm is owned by Pepe's Ducks and contact was made with that business. The two market gardens were sent letters by registered post with a delivery confirmation advice receipt. Both letters could not be delivered to the property addresses and so a card was left and the letters returned to the Kemps Creek Local Post Office. The letter to number 245 was picked up but the one to 190 Lawson Rd was not so it was returned to sender. The owner of number 245 Lawson Rd did not provide any answers to the questions. The lack of response means that the impacts will be considered based on the knowledge of market gardening in the area.

It is noted that the Department of Primary Industries and Regional Development have requested that the following be investigated:

"The adjacent duck farm is likely to produce ducks on a six-week cycle and send them to Windsor for processing. Consultation should be undertaken with the farm operator to determine how the business operates, including its cycles, deliveries, pickups, and how it utilises the local road network, as Lawson Road is their only exit route, to ensure any potential impacts are mitigated. Any impacts on this business may also affect the poultry processing plant, which serves as a secondary business reliant on the product. The potential impacts of any odour risk should also be considered for the new entrant."

Contact has been made with Pepe's Ducks who own the land at 225 Lawson Rd and answers were provided to the questions in Table 1. It is noted that Pepe's Ducks have their processing plant in South Windsor and the ducks are transported there.



Map 6: Farmer Consultation

Table 1: Summary of Neighbour Interviews

Question	Answer
Farm Purchased	About 1998.
Number of Duck Sheds	Eight in total. Six hold 4,800 birds each and the other two sheds hold 4,300 birds.
Delivery and Hatching	The ducks are delivered as day old ducklings from the hatchery in Mulgrave in a custom-built climate controlled rigid heavy vehicle.
Aware of Development on Surrounding Land	Yes
Feed Delivery	The feed is delivered to the farm via a contractor from the Weston feed milling in Enfield in vehicles carrying up to 40t of feed. Generally, there will be two to three deliveries per week.
Age of Ducks when processed	Age varies between 40 and 44 days depending on the production planning for different markets.
Frequency of delivery to processor	The ducks are sent to the processor when they are matured and depending on placement cycles could have between one to three pickups per week.
Number of ducks sent to the processor.	Between 14,400 and 18,700, or as little as 3,000 if they were for further processing.
Mode of transport	B-double with specially designed trailers specifically for poultry.
Route taken.	Lawson Rd and turn left onto Elizabeth Drive, however, if it is part of a multi-farm pickup, it may turn right on Elizabeth Drive
Complaints about odour emanating from the farm	No complaints from the Council or neighbours.
Number of ducks processed each week	Process up to 100,000 ducks per week
Impact on your processing facility if farm closes	If the farm closed it would not allow Pepe's to meet its sales demands without bringing another farm on line to replace the output from this farm.

2.8 Potential Land Use Conflicts

Rural land use conflict occurs when there are incompatible land uses which either adjoin each other or are in the vicinity of each other.

Most rural land use conflict occurs from the pollution associated with an agricultural land use causing a loss of amenity to an adjoining or nearby residential or rural residential use. This is particularly evident with intensive agriculture such as market gardening (vegetables), turf farming, orchards (fruit) and poultry as well as non-agricultural uses like extractive industries. Agriculture and other uses can affect adjoining non-rural uses, such as rural residential uses via pollution from the agriculture activities. The main cause of land use conflict is the pollution from the use, but it is also caused by lack of understanding and lack of communication between both the resident and the polluting use. Not only this, but there is also a lack of awareness of the zone in which the land is situated and its objectives when the new dweller moves in with no

knowledge or regard for rural land. They are expecting a lifestyle amongst the productive agricultural land and land uses.

Rural land use conflict can also occur between a new non-agricultural use such as an industrial or commercial use and existing agricultural uses. This can occur because of both the construction activity as well as the operational phases of the development. During construction dust can settle on vegetables being grown in the open and increase traffic can also interfere with the delivery of produce and supplies that are required for the vegetable production. During the operational phases, impact can be via traffic generation and potential complaints from the employees working in the buildings about noise, odour or spray drift from the intensive agriculture operations.

The land use survey provides the basis for the assessment of both impacts and is shown on Map 4.

It is noted that this SSDA is for bulk earthworks and is estimated to commence in the fourth quarter of 2026 be completed by the fourth quarter of 2029. Therefore, any impacts on the adjoining intensive agricultural uses will be for a limited timeframe. The only impact that can be foreseen is that from dust associated with the earthworks and rehabilitation. The closest intensive agriculture land uses are the hydroponics / market garden on the western side of Lawson Rd which is approximately 85m from the northern boundary and poultry farm is located approximately 250m from the northern boundary. On the eastern side of Lawson Rd there is a market garden which is also approximately 250m away from the northern boundary. There is some potential for dust to be generated and the Air Quality Impact Assessment prepared for this SSDA (SLR Consulting Australia Pty Ltd, 2026) has recommended Construction Air Quality Management Plan that has made recommendations to minimise the potential impact on the adjoining properties.

The surrounding land shown on the land use map is not considered to cause rural land use conflict with the future industrial use of the subject land. There are two reasons for this as follows:

1. The surrounding land to the north and south has well as the subject land is zoned as ENT Enterprise which has as its first objective to encourage employment and businesses related to professional services, high technology, aviation, logistics, food production and processing, health, education and creative industries. This means that in the future, all this land will likely be redeveloped for industrial land use and the current use as agriculture and rural residential will cease. It is likely that the market gardens may cease use before the completion of the bulk earthworks the and that the duck farm will cease after the use is operational. However, the exact timing of these is beyond the scope of this report.
2. Along both Badgerys Creek and South Creek, the land is zoned as ENZ Environment and Recreation which has as its first objective to protect,

manage and restore areas of high ecological, scientific, cultural or aesthetic values. This means that in the future this land will be developed for recreation and environmental uses, and this will also provide a buffer to the adjoining land.

The land to the east of South Creek is designated in the Aerotropolis Precinct Plan as part of the Wianamatta South Creek Non-Initial Precinct. This indicates that it will form part of the wider Wianamatta South Creek Precinct which is to be zoned as ENZ Environment and Recreation Zone which will provide a buffer to any future development to the east of the zone.

Land use conflict can also occur from a new non-agricultural land use locating near existing intensive animal or irrigated plant agricultural uses. This can lead to complaints from the users of the new non-agricultural uses complaining about odour, noise, dust or spray drift from the agricultural use because of a loss of amenity. However, as discussed above, it is not anticipated that this will occur.

2.9 Potential Biosecurity Risks

The Planning System plays an important role in protecting land and people in NSW from biosecurity risks that can be caused by proposed developments. These developments can include the following:

- new intensive livestock agriculture developments
- new intensive / irrigated plant agriculture developments
- new aquaculture agricultural developments
- state significant developments
- other proposed developments near existing agricultural businesses, transport corridors, pipelines or other industries.

The NSW Biosecurity Act (section 22) includes a general biosecurity duty which is as follows:

"Any person who deals with biosecurity matter or a carrier and who knows, or ought reasonably to know, the biosecurity risk posed or likely to be posed by the biosecurity matter, carrier or dealing has a biosecurity duty to ensure that, so far as is reasonably practicable, the biosecurity risk is prevented, eliminated or minimised." (NSW Department of Primary Industries, 2020, p. 5)

The Guidelines prepared by the DPI define the key terms as follows:

Biosecurity risk is the risk that a biosecurity impact will occur (section 14 of the Act).

Biosecurity impact is an adverse effect on the economy, the environment or the community that arises, or has the potential to arise from a biosecurity matter or a carrier and that relates to:

- the introduction, presence, spread or increase of a pest or disease of plants.
- the introduction, presence, spread or increase of a pest animal.

- the introduction, presence, spread or increase of a weed.
- the introduction, presence, spread or increase of a pest or disease of animals.
- plants, animals or animal products becoming chemically affected.
- risk to public safety caused by bees or non-indigenous animals.
- stock food, fertilisers, liming materials and trace element products.

Biosecurity matter is any living thing or part or product of a living thing (other than a human), any part of a plant or animal, a disease, a prion, a contaminant, or a disease agent.

Biosecurity carrier is anything (including a human) that has or is capable of having biosecurity matter on it.

The Guideline goes on to state that although the general biosecurity duty applies broadly there are several elements that must be satisfied which are as follows:

- **Deals with** – the general biosecurity duty only applies to a person who 'deals with' biosecurity matter or a carrier of biosecurity matter. 'Deal with' includes a wide range of activities, which are listed in section 12 of the Act. Some examples of dealing with biosecurity matter are to keep, possess, grow, breed, move, supply or manufacture biosecurity matter.
- **Knowledge** – a person must know, or ought reasonably to know, that there is or is likely to be a biosecurity risk arising from their dealing with biosecurity matter or a carrier. This will be a question of fact and will depend on the circumstances of each situation.
People who know or ought reasonably to know will generally include people who deal with biosecurity matter or carriers on a regular basis as part of a commercial or recreational activity, and people who work professionally (i.e. 'deal') with a particular type of biosecurity matter or carrier. For these people their general knowledge and expertise would in most cases be sufficient to indicate they should know the risks.
- **'Reasonably practicable'** – what is reasonably practicable for the prevention, elimination or minimisation of a biosecurity risk will depend on what was reasonably able to be done at a particular time, taking into account the nature and potential impact of the biosecurity risk, the person's level of knowledge of the risk and actions that could be taken to prevent, eliminate or minimise the risk, and the cost, availability and suitability of these actions. It is not likely to be reasonably practicable if the cost is greatly disproportionate to the risk.
- **Preventing, eliminating or minimising the biosecurity risk** – the risk must be prevented or eliminated if reasonably practicable, otherwise it must be minimised so far as is reasonably practicable.

The future land use is an industrial estate with fourteen warehouses and an amenity precinct. The Guideline prepared by the Department of Primary Industries (DPI) notes that non-agricultural land uses can have a biosecurity impact due to pests, diseases and weeds which can be spread through the movement of machinery and vehicles.

Biosecurity risks can occur during the operation of a non-agricultural land use as well as during the construction phase.

There are not many agricultural land uses surrounding the subject land. There are the two irrigated plant uses and the duck farm to the north of the site on Lawson Rd. These sites are perhaps the most significant from a biosecurity point of view. It is noted however that the closest irrigated plant land uses in proximity to the site is approximately 80m from the site boundary and the other irrigated plant use and poultry farm are 250m from the northern boundary of the land.

Chapter 3: Land Use Conflict and Biosecurity Risk Assessment

3.1. Introduction

The Department of Planning, Housing and Infrastructure has issued the Secretary's Environmental Assessment Requirement which has required an assessment of the Land Use Conflict Risks and Biosecurity Risks having regard to the relevant guidelines published by the DPI.

This chapter will discuss the risk of land use conflict and biodiversity from the future industrial estate on the surrounding agricultural land uses.

3.2. Land Use Conflict Risk Assessment

Rural land use conflict occurs when there are incompatible land uses which either adjoin each other or are in the vicinity of each other.

It has been noted in section 2.8 that the only land use conflict that can be anticipated is dust and that the Air Quality Impact Assessment has recommended actions to ameliorate this.

Most rural land use conflict occurs from the pollution associated with an agricultural land use causing a loss of amenity to an adjoining or nearby residential use. Whilst it is possible for a non-agricultural land use such as that being proposed to have a detrimental impact on an irrigated plant use growing vegetables or poultry developments such as that occurring to the north of the subject land in Lawson Rd, it is not considered in this case to be an outcome that would occur. This is due to the following factors:

1. The possibility that the farms will be redeveloped during the period of the bulk earthworks.
2. The adjoining intensive agricultural land uses are approximately 85 to 250m from the subject land.
3. Whilst it is possible for dust to impact on the nearby market gardens, it is noted that the site is a former quarry and that there is potential that the market garden has been subject to dust in the past. It is noted that that dust mitigation measures will be implemented under the Air quality and Odour Report which will suitably address these issues.

These aspects combine to negate considerably any land use conflict. The imminent change of use of the irrigated plant use adds to the lack of land use conflict.

The lack of any potential land use conflict negates the need for any mitigation measures. Similarly, the likelihood that the intensive agricultural uses to be redeveloped into

industrial over the next five years, means that there will not be any cumulative impacts of the development on the surrounding land.

3.3. Biosecurity Risk Assessment

Biosecurity risks are mostly associated with a new agricultural development on the surrounding landscape or a non-agricultural use on an existing agricultural use on adjoining or adjacent land.

The DPI Guidelines suggest that the following can be used to mitigate the biosecurity risks associated with a development:

- Buffer zones
- Wash down facilities
- Designated parking areas
- Dumping and burying rubbish on site

However, these are normally associated with a new agricultural development rather than an industrial estate opposite an irrigated plant use or near a duck farm.

The Guidelines also suggest that Biosecurity Management Plans can be used to minimise any risks.

It has already been noted in the previous section that there is not likely to be any land use conflict associated with the bulk earthworks on the irrigated plant and poultry land uses to the north of the subject land. The same reasons outlined for land use conflict can be applied to biosecurity risks and it is concluded that there will be minimal biosecurity risks associated with the proposed development. It is also not considered necessary to recommend any Biosecurity Management Plan.

Chapter 4: Conclusion

This Land Use Conflict Risk Assessment and Biosecurity Management Plan has been prepared by Edge Land Planning 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 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).

This report has undertaken investigation into the property and its potential for use as an industrial estate. This has included the identification of the surrounding land uses as well as the topography and natural features and climate.

This report concludes that there is not likely to be any land use conflict or biosecurity risks associated with the development of the subject land for the following reasons:

- the changing nature of the surrounding land use to enterprise uses, and
- the recommendations of the Air Quality Impact Assessment on any potential dust impact.

Therefore, proposed development is suitable and warrants approval.

Bibliography

- Australian Government Bureau of Meteorology. (2024). Climate Statistics Badgerys Creek AWS. Retrieved from http://www.bom.gov.au/climate/averages/tables/cw_067108.shtml
- Australian Government Bureau of Meteorology. (2025). Climate Statistics Badgerys Creek AWS.
- NSW Department of Primary Industries. (2011). *Land Use Conflict Risk Assessment Guide*. Orange: NSW Department of Primary Industries
- NSW Department of Primary Industries. (2020). *Managing Biosecurity Risks in Land Use Planning and Development Guide*. Orange: NSW Department of Primary Industries
- Sinclair, I., & Bunker, R. (2012). Planning for Rural Landscapes. In S. Thompson & P. Maginn (Eds.), *Planning Australia - An Overview of Urban and Regional Planning* (Second ed.). Melbourne: Cambridge University Press.
- SLR Consulting Australia Pty Ltd. (2026). *Project Maverick – Earthworks and Remediation – SSD 97711727. Air Quality Impact Assessment*. Sydney: SLR Consulting Australia Pty Ltd

Appendix 1: Land Use Methodology and Definitions

The Land Use Survey:

A land use survey has been carried out to determine the land use of the study area and the surrounding land.

The first step is to identify the categorisation of the land uses to be surveyed. The land use has been categorised into primary and secondary land use categories. The primary land use categories are as follows:

- Commercial
- Extensive Agriculture
- Extractive industries
- Irrigated Plants
- Intensive Animals
- Native Vegetation
- Public Use
- Rural Residential
- Urban
- Vacant

Definitions of each use which were used for the purpose of identifying the land uses are as follows:

- *Commercial* uses are uses that are used for a commercial or industrial type of use and which do not have any dwellings associated with them.
- *Extensive Agriculture* means the growing of plants using natural rainfall or the rearing of animals using grazing as a feeding method. It also includes the growing of fodder crops and irrigated pasture.
- *Extractive Industry* means a use that extracts material from the land and includes mining, sand and clay mining and quarrying of sandstone and other stones.
- *Irrigated plants* means the growing of vegetables and ornamental plants for commercial gain using the application of irrigated water and includes market gardening, protected cropping structures, orchards, vineyards, and other similar uses.
- *Intensive Animals* means the rearing of animals using a feeding method other than natural grazing and includes poultry and piggeries mainly.
- *Native Vegetation* means a lot that has no dwellings or structures on it and which has the majority of the land covered in native vegetation.
- *Public Uses* mean a use that is commonly used and or operated by a public authority or associated body. It includes community facilities, golf courses and Government owned uses of the land.
- *Rural Residential* means a house on a lot that is greater than 0.4 ha generally, and is in a rural environment where the main source of income is from other

sources than agricultural use of the land. Rural-residential is further divided into three categories, being:

- ⇒ *Rural Fringe*: estate style development on lots ranging from 0.4 to 2 ha;
- ⇒ *Rural Living*: lots ranging from 1 ha to 40 ha scattered throughout the landscape
- *Vacant* land is land that is mostly cleared of native vegetation, and which does not have any dwellings or other structures on it.

The sub-categories are a detailed description of the land use of each parcel. It includes the following:

- Commercial: factory
- Extensive agriculture: grazing,
- Extractive Industry: coal Mine
- Intensive Animals: poultry
- Irrigated Plants: protected cropping
- Native Vegetation: native vegetation
- Public Use: church
- Rural Residential: dwellings,

Methodology:

There are 3 components to the carrying out of the land use survey as follows:

- Preliminary identification of land use.
- Study area inspection.
- Data entry and mapping.

Preliminary identification of land use occurred in the office prior to the field inspection. Aerial photography was used to identify the land use. The major things to be picked out are extensive agriculture, intensive animals, irrigated plants dwellings on small lots, vacant land, lots which are totally covered with native vegetation, and extractive industries. Only one major land use was identified for each site. An assumption was made that lots less than 40 ha which did not have an intensive agricultural, commercial, industry or public use and were in a separate ownership to the surrounding land, were rural residential. Where there is just a dwelling, it was coded in the second use as dwelling, if there was a horse, horse and if there was a truck use it was coded as a truck use. If the land is cleared and has a dwelling house located on it and is either greater than 40 ha or was owned in association with the surrounding land and was greater than 40 ha, it was coded as extensive agriculture.

This information was entered into the database using the coding that has been identified for the primary and secondary land uses.

The study area inspection was carried out by windscreen survey of all of the roads. This was done to check the primary land use categories and also to enter secondary ones that could not be identified from the aerial photos. As each road is driven on the land

use is clarified against the preliminary identification. Signage, which gives an indication that the property may be used for a secondary use such as a home business or a commercial use, was also noted. Many photos were taken of the land use and general landscape of the rural lands.

Appendix 2: Farmer Questions

Letter to Market Gardens.

Proposed Development of Industrial Estate 225-245 Martin Road, Bradfield

I am a Rural Planning consultant with 40 years of experience working in rural areas where I regularly talk to farmers about their farming systems. This experience has provided me with a good understanding of all farming systems practiced in the Sydney peri-urban area. This agricultural background provides me with a good understanding of the impact of development on the agricultural uses Goodman Property Services (Aust) Pty Ltd have lodged a State Significant Development Application with the Department of Planning, Housing and Infrastructure for an Industrial Estate at 225-245 Martin Road, Bradfield which is the former CSR Quarry. There are two DAs for this site which are as follows:

1. SSD-97711727 - Bulk Earthworks. This will rehabilitate the former quarry to allow for the land to be redeveloped into the industrial estate.
2. SSD-97688711 Internal Works. This seeks approval for the fourteen warehouse buildings.

I have attached the Newsletter which has been prepared for the site in November, which outlines the details of the project.

I have been engaged to prepare a Land Use Conflict and Biosecurity Risk Assessment for the proposed Industrial Estate. The purpose of this is to assess the impact of the proposed development on the surrounding agricultural uses. I have visited the area and note that you operate a market garden on your land. To enable me to understand your farm, I would like to ask you some questions which I have set out below:

1. What is the size of your farm?
2. How long have you been farming the land?
3. Are you aware of the development on the surrounding land?
4. How long do you intend to stay farming this land?
5. How much land do you have under crops?
6. What do you grow?
7. Where do you sell your produce?
8. How do you transport the produce? What type of vehicle?
9. How many times per week do you do this?

I would like to discuss this with you over the phone and would appreciate it if you could call me on the number below by 19 December. I look forward to discussing your farm and please don't hesitate to contact me if you have any questions.

Questions to Duck Farm

1. How long has the duck farm been on the land?
2. When did your firm purchase the land?
3. How many ducks are housed in each of the sheds on the farm?
4. How old are the ducks when they are delivered to the farm?
5. Where are they hatched?
6. How are they transported? How big is the vehicle?
7. How is the feed delivered to the farm? How big is the vehicle?
8. How often is the feed delivered?
9. Where is the feed transported from?
10. How old are the ducks when they are sent to the processor?
11. How often are the ducks sent to the processor?
12. How many ducks are sent to the processor each time?
13. How are they transported? How big is the vehicle?
14. Do the vehicles travel along Lawson Rd and turn left onto Elizabeth Drive? I note that when I was last in the area earlier this year that Cuthel Rd was closed so Lawson Rd was the only route. Do you know if that is still the case?
15. Have there been any complaints to your firm or the Council about any odour emanating from the farm?
16. How many ducks do you process each week?
17. If this farm closes, will there be an impact on your processing facility?