LIVERPOOL CITY COUNCIL

Ref No.: SSD1-14/2025
Contact: Azmal Hussain
Ph: 1300 36 2170
Date: 5 Dec 2025

Department of Planning, Housing and Infrastructure

Locked Bag 5022

Parramatta NSW 2124

Sent via email: david.schwebel@planning.nsw.gov.au

Re: Request for Council's Advice on SEARS – 275 Adams Road, Luddenham

Dear David,

Liverpool City Council was invited to provide comments on the Planning Secretary's Environmental Assessment Requirements (SEARS) for Ferndale Industrial Precinct (Stage 2 and 3) at 275 Adams Road, Luddenham (Part Lot 3 DP 623799).

The Scoping Report has described the proposed development as warehouse and distribution centres including ancillary Office premises. The development comprises of site preparation works, infrastructure works, subdivision, construction and operation of warehouse industrial buildings including ancillary office space, car parking, hardstand areas, landscaping and signage.

The development will have two warehouse and distribution centres comprising of:

- A warehouse with a total GFA of 6,580 m^2 including 6,080 m^2 of warehouse GFA and 500 m^2 of ancillary office GFA containing one tenancy.
- A warehouse with a total GFA of 10,800 m^2 including 9,600 m^2 of warehouse GFA and 1,200 m^2 of ancillary office GFA for six tenancies.

The site is zoned Agribusiness (AGB) and Environment and Recreation (ENZ) under the *State Environmental Planning Policy (Precincts—Western Parkland City) 2021* as part of the Aerotropolis Core Precinct. The proposed development is entirely located within the AGB zone and therefore the proposed development is permissible.

Attachment A of this letter provides detailed comments and information required for lodgement of an Environmental Impact Assessment (EIS). Council staff will provide further comments during the exhibition stage of the State Significant Development (SSD).

As this application represents one of the first SSDs within the Aerotropolis Core Mixed-Use zone in the Liverpool Local Government, it will form a precedent in relation to future applications

lodged. On this basis, it is recommended that compliance is clearly demonstrated with all aspects of the strategic planning framework for the Western Sydney Aerotropolis.

Should you require further information please contact Azmal Hussain, Acting Senior Development Assessment Planner on 1300 36 2170.

Yours sincerely,

Azmal Hussain

Acting Senior Development Assessment Planner

Development Assessment

Attachment A – Detailed comments and required information

1. Strategic Context

The Environmental Impact Statement (EIS) must include sufficient supporting information and technical reports to demonstrate compliance with the relevant Strategic framework for the site including:

a) Western Sydney Aerotropolis Plan 2020 (WSAP) – addressing all relevant heads of consideration under the plan, including how the objectives of this plan will be achieved.

b) State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (SEPP) – Provision of detailed information demonstrating how all relevant heads of consideration are satisfied with careful consideration in relation to; 4.1 Aims of the chapter, 4.12 Zone Objectives and Land Use Table, Part 4.3 Development Controls – Airport safeguards, 4.25 Preservation of trees and vegetation in Environment and Recreation Zone and Cumberland Plain; Part 4.5 Design Excellence, 4.49 Public Utility Infrastructure.

c) Western Sydney Aerotropolis Precinct Plan 2023 (WSAPP) – Demonstrating full compliance with all relevant sections of the WSAPP. The site must demonstrate WSAPP compliance road, pedestrian, active transport and public transport connection to a WSAPP compliant regional road.

d) Western Sydney Aerotropolis Development Control Plan (DCP) - While SSDA's are not required to demonstrate compliance with DCP's, it is strongly advised that this development considers the DCP as it provides detail in relation to required compliance with the WSAPP (for example road reserve designs for identified road hierarchy under the WSAPP and specific stormwater requirements relating to the Blue-Green infrastructure framework) and provides an understanding as to what the future envisioned character of the precinct will be. As such it is recommended that any future EIS demonstrates full compliance with the DCP.

e) It is also required the any future EIS reviews the above planning framework to determine what additional supporting information will be required to demonstrate compliance. A suggested list is provided for guidance in this report below.

f) The EIS must demonstrate how all relevant conditions in relation to all previous SSDA determinations are proposed to be complied with, especially in relation to site remediation works across the entirety of the site and remediation and improvement works within the watercourse, riparian area and surrounding ENZ zoned land and land identified as Cumberland vegetation.

2. Traffic and Transport

The subject site is located within the aerotropolis precinct. Hence, the transport impact assessment report is to be prepared in accordance with TfNSW(Transport for NSW) Guide to Transport Impact Assessment – Technical guidance for transport practitioners (TS 00085 V1.1), Guide to Traffic Management Part 12: Integrated Transport Assessments for Development

(Austroads, 2020), the planned road network in accordance with the Western Sydney Aerotropolis Precinct plan, and Western Sydney Aerotropolis Development Control Plan.

The TIA report is also to include the following (but not being limited):

a) Daily and peak traffic movements which are likely to be generated by the proposed development including the impact on nearby intersections and the need /associated funding for upgrading or road improvement works (if required).
b) Details of the proposed accesses and the layout of the parking associated with the proposed development including compliance with the requirements of the relevant Australian Standards (i.e. turn paths, sight distance requirements, aisle widths, etc).
c) Proposed number of car parking spaces and compliance with the appropriate parking codes.
d) Details of heavy vehicle movements and haulage routes (including vehicle type and likely arrival and departure times).
e) Assessment of adequacy of Adams Road pavement conditions and road infrastructure to cater for increasing traffic movements generated from the subject development and other planned developments within the area.
f) Intersection performance analysis is to be carried out to assess cumulative traffic impacts of the proposed development and other planned developments within the area.
g) The proposed collector road, local road or park edge street should be designed in accordance with the aerotropolis DCP. Design of a collector road, local road and park edge street should be submitted to Council for approval.
h) It is noted that TfNSW is currently upgrading Elizabeth Drive. The intersection of Elizabeth Drive/Adams Rd will be restricted to left in/left out as part of the upgrade. Consultation is required with TfNSW for interim and ultimate access to/from Elizabeth Drive.
i) Details of Elizabeth Drive upgrade can be found via the website: Elizabeth Drive upgrade | Transport for NSW.
j) Both interim and ultimate access arrangements to the subject site are required to be identified and included in the TIA report.
k) Identification of the required road, active transport, bus stop and intersection upgrades to facilitate the subject development.
l) Prepare a location-specific sustainable travel plan (eg ‘Travelsmart’ or other travel behaviour change initiative); and the provision of facilities to increase the non-car mode share for travel to and from the site. This will entail an assessment of the accessibility of the development site by public transport.
m) The provision of a construction traffic management plan for all demolition / construction activities, detailing vehicle routes, number of trucks, hours of operation, access arrangements and traffic control measures.

3. Urban Design and Public Domain

The Pre-State Significant Development Application **SSD1-14/2025** for the proposed development at **275 Adams Road,** has been assessed from an Urban Design and Public Domain perspective with consideration to nine design principles. These are; Context, Built Form and Scale, Density, Sustainability, Landscape, Amenity, Safety, Housing Diversity & Social

Interaction and Aesthetics. The comments have been categorised under these nine headings below.

1. Context

1.1. The first objective of the Precinct Plan is ‘‘*Start with Country’ by promoting access to Country and designing the Aerotropolis through a process that includes Aboriginal people*.’ Most importantly, a genuine Recognise Country Strategy should be provided, incorporating the required engagement process, a Walk on Country, and a clear commitment to embedding Country-centric thinking into the overall design, guided by the Aboriginal community. This strategy should demonstrate how Country Principles inform key aspects of the development, including site planning, cut and fill, sustainability, landscape design, public art, architectural expression, and materiality. CDPD notes the Scoping Report indicates the intent to prepare a Designing with Country Framework and an Aboriginal Cultural Heritage Assessment Report to inform the proposal.

1.2. The Aerotropolis Precinct Plan designates a Local Street and a Park Edge Street which cut through the site. The Precinct Plan also indicates a Collector Road positioned at the southern edge of the site. The proposes site plan appears to depart from the Precinct Plan proposed road network. The scoping report indicates that details of the proposed internal road network will be provided with the EIS. CDPD recommends the preparation of a concept master plan inclusive of the potential design for Stage 4 of the site, illustrating the ‘end-state’ of the site once the quarry area is redeveloped, and how the proposed road network for Stages 2 and 3 are optimised with the future development of stage 4. CDPD is particularly concerned with the development of the Park Edge Street and how the development will design the adjacency and interface with Oaky Creek. The Precinct Plan shows the intent of an active frontage which is being precluded or forgotten with the current iterative and reactive approach to the development of the site. CDPD requires the applicant to demonstrate how the development will meet the requirements of Liverpool Local Strategic Planning Statement Planning Priority 14, to celebrate, connect, protect and enhance bushland and waterways.

1.1. It is highly encouraged that the proponent references the technical study prepared for the Agribusiness Precinct Urban Design and Landscape Report, which offers a holistic approach and an overarching urban design framework for the entire precinct. The Urban Design Framework contains a significant amount of valuable information on the Key Principles, Structure and Vision of the Precinct, and it is recommended that it is referred to as part of the design process, and utilised to inform the interpretation of the planning controls under the WSAP and DCP.

1.2. The site is visible directly from the Western Sydney International Airport terminal. CDPD recommends consideration of the view lines when progressing the design and the placement of frontages and building form to be screened with adequate landscaping in consideration of this viewshed.

1.3. The interface and coordination between Stage 1 and Stage 2 is unclear when comparing the current plans for Stage 1 under construction and the proposed site plan for stage 2, which seems to indicate a 20m awning over the current access road. CDPD recommends the preparation of a concept master plan for the full site to accompany the proposal, demonstrating how the development stages will integrate, and a consistent local road network will be established within the site, preferably consistent with the requirements of the WSA Precinct Plan.

2. Built Form + Scale

2.1. The warehouses will have a large footprint which goes beyond a sensible human scale. CDPD encourages the applicant to consider the requirements of the WSA DCP for articulation and materiality of the built form to 'break down' the sense of scale of those warehouses.

3. Density

3.1. Nil at this stage

4. Sustainability

4.1. It is likely the proposed facilities will have a large roof area and site coverage. CDPD recommends allowing for solar panels for energy production to offset the running costs of the facility, and also, allow for water reuse for irrigation of landscaped areas reducing the overall requirements for maintenance of the site.

5. Landscape

5.1. CDPD requires the applicant to demonstrate how the canopy cover and deep soil targets of the DCP are being achieved by providing plans, diagrams and schedules showing the tree canopy calculations. For off-street car parking, CDPD recommends to allow for tree planting within parking areas at the ratio of 1 tree for each 5 car bays. CDPD also encourages the use of tree planting surrounding large hardstand areas to provide shade and reduce heat gains in summer.

5.2. CDPD recommends considering the placement of building services (fire hydrants, substations) within the front setback area from an early stage. Should there be requirements for these types of services within the front setback area, they should be positioned in a way which minimises visual impact from the public domain, with a preference to use landscaping to encircle the building services areas and integrate them with fencing.

5.3. Consider and provide documentation of perimeter fencing including a diagram indicating proposed fence heights and materiality. Consider how the fence can be integrated with further landscaping for screening of views. CDPD preference would be for picket fencing accompanied with planting (bushes or trees). See **Figure 1** example below for areas where a visual barrier is required. Planting species can be full height (as shown) or mid height and selected appropriately with reference to the Aerotropolis DCP Specifications.

5.4. The large footprints will require considerable retaining walls to allow for the modulation of the site earthworks. CDPD encourages the applicant to provide detailed documentation regarding the height and materiality of retaining walls, particularly those facing the public domain.

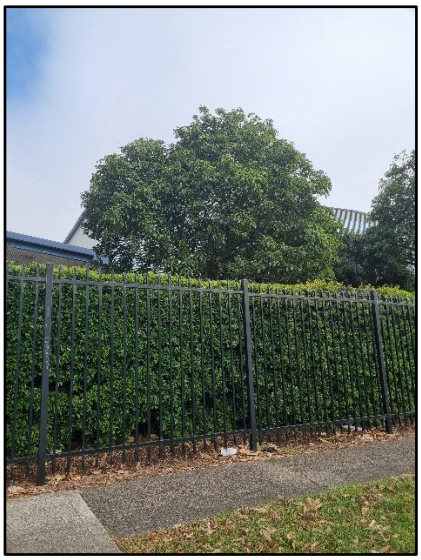

Figure 1 – CDPD guidance for configuration of front fencing (screen planting can be full height or mid height).

5.5. CDPD recognises the development is partially impacted by Bushfire Prone Land and the associated vegetation buffer for Bushfire Prone Land. The Precinct Plan and DCP canopy cover requirements are a critical aspect of the Aerotropolis landscape-led approach. Canopy cover plays a key role in the Aerotropolis being able to withstand the environmental impact of urbanisation in this area in terms of impact to waterways, urban heat island affect and the natural environment. The following should be considered:

- CDPD recommends coordination with the project team, bushfire consultant and ecologist to establish an appropriate site coverage that enables the DCP canopy cover target to be achieved.
- CDPD recommends greater investigation into bushfire mitigation including innovative strategies to respond to bushfire requirements to enable greater canopy on this site, such as considering the future development that is to occur and change the landscape and surrounding threats of the precinct, as land development occurs which represents a reduction of bushfire fuel loads, and an increase in the accessibility for bushfire response.

6. Amenity

6.1. CDPD encourages the applicant to consider the needs of the employees, depending on their number, for communal areas, break areas, and integrate those with the landscape design.

6.2. CDPD encourages the applicant to allow for shading of external walls to minimise heat gains in summer, and reduce the requirements for mechanical cooling systems. CDPD recommends the inclusion of wide roof eaves for shading of external walls.

7. Safety

7.1. Nil at this stage.

8. Housing Diversity and Social Inclusion

8.1. Nil at this stage.

9. Aesthetics

9.1. Nil at this stage.

4. Environmental Health

Environmental Impact Statement

The Environmental Impact Statement shall be prepared in accordance with all relevant requirements of the *Environmental Planning and Assessment Regulation 2021.*

Appropriate Regulatory Authority

Schedule 1 of the *Protection of the Environment Operations (POEO) Act 1997* declares premises-based activities regulated by the NSW Environment Protection Authority (EPA). The Applicant shall confirm whether the proposed development includes any scheduled activities that will require an Environment Protection Licence from the NSW EPA (Integrated Development). In these circumstances, approval must be obtained from the NSW EPA before consent can be granted. The consent authority must refer the development application to the relevant public authority and incorporate the public authority's general terms of approval.

State Environmental Planning Policy (Resilience and Hazards) 2021

In accordance with Clause 4.6(1) of *State Environmental Planning Policy (Resilience and Hazards) 2021*, the consent authority is required to consider contamination and the need for remediation when determining an Application. If the land requires remediation, it must be satisfied that the land will be remediated before the land is used for that purpose. Furthermore, Clause 4.6(2) of *State Environmental Planning Policy (Resilience and Hazards) 2021* requires the consent authority to consider a report specifying the findings of a preliminary investigation of land if the proposed development involves a change of use on any land specified in subclause 4. It is the responsibility of the consent authority to consider the requirements of Clause 4.6 of *State Environmental Planning Policy (Resilience and Hazards) 2021.*

The Application involves a change of use on land previously used for a potentially contaminating activity in Table 1 of the contaminated land planning guidelines. A precautionary approach to the assessment of this proposal is warranted. Consequently, additional advice is required from a suitably qualified environmental consultant to determine the suitability of the land for the proposed development.

In this regard, the applicant shall engage the services of a suitably qualified environmental consultant to prepare or review and certify a Stage 1- Preliminary Site Investigation for the Land. The Preliminary Site Investigation shall comply with applicable guidelines made or approved by the NSW EPA under the *Contaminated Land Management Act 1997* and identify all past and present potentially contaminating activities; identify potential contamination types; discuss the site condition; provide a preliminary assessment of site contamination; and assess the need for further investigations.

Where contaminating activities are suspected or known to have occurred, or if site history is incomplete, it may be necessary for the suitably qualified environmental consultant to prepare or review and certify a Stage 2- Detailed Site Investigation. This investigation shall give regard to the potential effects of any contaminants on public health, the environment and building structures and shall meet the sampling density outlined in the NSW EPA 'Sampling Design Guidelines for contaminated land (2022).

If the Stage 2-Detailed Site Investigation indicates that the site poses unacceptable risks to human health or the environment, a Remedial Action Plan (RAP) shall be prepared or reviewed and certified by a suitably qualified environmental consultant in accordance with applicable guidelines made or approved by the NSW EPA under the *Contaminated Land Management Act 1997*. In these circumstances, the Remedial Action Plan shall be referred to the consent authority for review.

It is recommended that the Application is supported by a Section B site audit statement and site audit report prepared by a NSW EPA accredited site auditor.

Contaminated site reports shall be prepared or reviewed and certified by a suitably qualified environmental consultant who is certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.

State Environmental Planning Policy (Transport and Infrastructure) 2021

Clauses 2.100 and 2.120 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* are not applicable as the proposed development is not for residential accommodation, a place of public worship, a hospital, educational establishment or centre-based childcare facility that are likely to be adversely affected by rail or road noise. However, the Department must consider whether the proposed development may be a traffic generating development as defined in Column 1 of the Table to Schedule 3 of *State Environmental Planning Policy (Transport and Infrastructure) 2021.*

Acoustic Assessment

The proposed development may be a source of offensive noise and potentially impact upon human health and amenity. An acoustic report shall be prepared or reviewed and certified by a suitably qualified acoustic consultant and include a quantitative assessment of all noise and vibration generating sources during site preparation, construction and operation in accordance with the NSW Environment Protection Authority's 'Noise Policy for Industry' (2017) and Department of Environment and Conservation's 'Assessing Vibration: A Technical Guideline dated February 2006. The cumulative effect of noise must be considered when assessing the impact upon receivers.

Where necessary, the report shall also assess potential road traffic noise impacts in accordance with the 'NSW Road Noise Policy' prepared by the Department of Environment, Climate Change and Water NSW (DECCW NSW) dated March 2011. The project noise trigger levels for the proposed development shall be selected according to the most stringent intrusive or amenity criteria. If required, recommendations and noise control measures shall be specified to achieve compliance with the assessment criteria. The assessment shall be representative of all noise generating activities on-site including but not limited to mechanical plant, deliveries and motor vehicle movements.

When assessing noise levels at commercial or industrial premises, the noise level shall be determined at the most affected point on or within the property boundary. Alternatively, when gauging noise levels at residences, the noise level shall be assessed at the most affected point on or within the residential property boundary. Where necessary, sound levels shall be adjusted in accordance with NSW Environment Protection Authority's guidelines for tonality, frequency weighting, impulsive characteristics, fluctuations and temporal content.

Detailed specifications of any equipment, machinery or public address system are required to determine noise impacts associated with the proposed development's operation. Construction noise shall also be assessed in accordance with the 'Interim Construction Noise Guideline' published by the Department of Environment and Climate Change NSW dated July 2009.

The acoustic report shall be prepared or reviewed and certified by a suitably qualified acoustic consultant who is a member of the Australian Acoustical Society or employed by an Association of Australasian Acoustical Consultants (AAAC) member firm. The report's cover or title page must confirm the consultant's membership with the Australian Acoustical Society or employment by an Association of Australasian Acoustical Consultants (AAAC)

Noise Management Plan

Noise Management Plans are required for potentially noise generating activities at the premises. The Noise Management Plans must identify and implement strategies to minimise noise from the proposed development and incorporate: approaches for promoting noise awareness by staff; training procedures; a complaint lodgement procedure to ensure that members of the public and nearby occupiers are able to report noise issues; an ongoing review process and a plan for responding to noise complaints. The Noise Management Plans shall clearly specify the responsibilities of site personnel in managing noise and include a detailed list of steps taken to manage potential noise impacts and be prepared under the supervision of a suitably qualified acoustic consultant who is a member of the Australian Acoustical Society or employed by an Association of Australasian Acoustical Consultants (AAAC) member firm.

Air & Water Quality Management

Consideration must be given to the proposed design, construction and layout of the premises to ensure that the facility is able to be operated in an environmentally satisfactory manner. This would include the incorporation of appropriate safeguards in the design and construction of the facility to prevent the generation of wind-blown dust and contamination of overland flow and surface waters.

State Environmental Planning Policy (Resilience and Hazards) 2021

The Applicant shall confirm whether dangerous goods will be stored at the premises and if the requirements of Part 3, *State Environmental Planning Policy (Resilience and Hazards) 2021* apply to the development. To address the requirements of Part 3, *State Environmental Planning Policy (Resilience and Hazards) 2021*, the Proponent may be required to prepare a preliminary screening procedure and/or Preliminary Hazard Analysis for the proposal.

Chemical Storage

Detailed plans of the facility and chemical storage areas shall identify bunding, spill kit locations and drainage infrastructure. All work and storage areas where spillage may occur shall be bunded. The capacity of the bunded area shall be calculated as being equal to 110% of the largest storage or process vessel/container in the area or 25% of the total volume of vessels/containers accommodated in the area, whichever is greater. The canopy covering the chemical storage areas shall have an overhang by 10° to prevent rainwater intrusion.

Plans may also be required to demonstrate compliance with Australian Standard (AS) 1940–2017: The storage and handling of flammable and combustible liquids; AS/NZS 3833:2007 The storage and handling of mixed classes of dangerous goods, in packages and intermediate bulk containers;

and if applicable, Australian Standard (AS) 1692-2006 Steel tanks for flammable and combustible liquids.

Site Plans

Detailed site plans for the proposed facility shall be submitted with the Application and include:

- Environmental safeguards such as trafficable bunds installed at the entry and exits of chemical and waste storage areas to prevent contamination of the surrounding environment;
- Sealed trafficable areas to prevent dust emissions and tracking of sediment and other material from the site;
- An enclosed building for the complete storage of chemicals and waste;
- The roof covering all storage areas, garbage bin bays and chemical storage areas shall contain an overhang of at least 10º to prevent rainwater intrusion. Uncontaminated rainwater shall be directed from the canopy and other roofed areas into stormwater drains;
- The location of spill kits, stormwater pits and stormwater drainage infrastructure. A detailed drainage diagram shall be submitted with the Application to clearly identify the proposed location of surface drains, sewerage and stormwater infrastructure; and
- Manufacturer's specifications and the location of any pre-treatment devices to be installed at the subject premises.

All containment measures including trafficable bunds shall be designed, installed and constructed in a manner which: permits the safe passage of personnel and vehicles, maintains effective containment capacity and minimises intrusive/offensive noise impacts arising from vehicle operation.

Regulated Systems

The installation, operation and maintenance of cooling water systems and warm water systems are regulated under the *Public Health Act 2010.* The Applicant must confirm whether regulated systems such as cooling water systems will be installed at the premises in accordance with the *Public Health Act 2010*, *Public Health Regulation 2022* and AS 3666.

Food Safety

If the premises will be used to store food for sale, the Application shall be supported by detailed floor and section plans demonstrating compliance with the Food Act 2003, Australia New Zealand Food Standards Code and Australian Standard (AS) 4674-2004 Design, Construction and Fit-Out of Food Premises.

Sewage Management

Development proposed to rely on any form of on-site sewage management, and/or on properties not currently connected to Sydney Water's reticulated sewerage service, shall incorporate the provisions of Council's On-site Sewage Management Standard.

Waste Management

The Application shall specify how refuse and waste will be managed during site preparation, construction and operation. Suitable waste storage facilities are to be provided as part of the proposal. The garbage/waste storage areas shall be clearly identified on the site plans. The designated garbage/waste storage areas shall comply with the following requirements:

a) The rooms shall be fully enclosed and provided with a concrete floor, and with concrete or cement rendered walls coved to the floor;

b) Provided with a hose cock for hosing the garbage bin bay and a sewered drainage point in or adjacent to the bin storage area. The drainage point should have a fine grade drain cover sufficient to prevent coarse pollutants from entering the sewer. If the hose cock is located inside the bin storage bay, it is not to protrude into the space indicated for the placement of bins;

c) The room shall have a floor waste which is to consist of a removable basket within a fixed basket arrestor and is to comply with Sydney Water requirements; and

d) The room must include a tight-fitting, self-closing door and mechanical ventilation.

5. Floodplain Management

The Environmental Impact Statement (EIS) must include a Flood Assessment Report and Stormwater Management Report with the following details:

- A Flood Assessment Report, including both hydrologic and hydraulic analysis shall be submitted to demonstrate that the proposed development will not cause any adverse impact on adjoining properties.
- The Stormwater Management Report shall include both interim and ultimate stormwater management measures and must demonstrate compliance with the objectives and targets outlined in the Western Sydney Airport (WSA) DCP (2022) and the "Technical Guidance for Achieving Wianamatta-South Creek Stormwater Management Targets" (DPE 2022).

6. Developer Contributions

A contributions plan (CP) is in place for the subject site or the larger Aerotropolis area and s7.12 Contributions apply.

7. Land Development Engineering

The following must be addressed as part of the EIS:

- Details Civil Plan including all internal roads and access roads to be submitted. The plan should demonstrate internal access road connected to public collector road is sufficient to carry heavy vehicles. Pavement design is to be approved by Council's pavement Engineer prior to issue a construction certificate.
- Details stormwater concept plan prepared by a qualified hydraulic Engineer shall be accompanied by a supporting report and calculations. DRAINS.drn model to be submitted in accordance with proposed concept plan.
- The development is within the Western Sydney Aerotropolis (WSA) Precinct. Therefore, it must meet the stormwater, water-sensitive urban design, integrated water, and flood management objectives and targets outlined in Sections 2.3 and 2.5.1 of the WSA Phase 2 Development Control Plan (DCP) 2022.
- The proposed Industrial development must incorporate a permanent on-site detention (OSD) basin to ensure that post-development stormwater flows do not exceed pre-development levels. If direct discharge of stormwater to the creek is proposed without OSD, hydraulic

modelling must be provided to demonstrate that there are no adverse impacts during the 20%, 10%, 5%, and 1% AEP storm events.

- Sydney Water is the designated Regional Stormwater Authority for the Western Sydney Aerotropolis Precinct and is responsible for establishing a regional basin network within the area. Until this network is in place, interim measures will be required to manage both the quantity and quality of stormwater on-site. It is recommended that proponents consult with Sydney Water regarding these interim requirements prior to lodging any development application.
- Water quality treatment facilities must be provided to ensure that stormwater runoff from the site complies with the standards set out in the WSA DCP (2022) and the Technical Guidance for Achieving Wianamatta–South Creek Stormwater Management Targets (DPE, 2022). These facilities must be designed using the MUSIC Modelling Toolkit – Wianamatta. An electronic copy of the calibrated MUSIC model, updated to reflect the proposed development, along with the accompanying results analysis spreadsheet, must be submitted for review.
- If this development requires an easement to drain water over downstream properties, the easement to drain water must be registered prior to the issue of an operational consent. The acquisition of drainage easements over downstream properties will be required where direct access to Council's drainage system, discharge of stormwater to a creek, or to the street network is not possible e.g. street kerb and gutter, piped system, open channel or watercourse (subject to demonstrating no adverse impacts).

Earthworks

- No retaining walls or filling is permitted for this development which will impede, divert or concentrate stormwater runoff passing through the site.
- Earthworks and retaining walls must comply with Council's Development Control Plan.
- The application is to be supported by a geotechnical report prepared by a suitably qualified person to address (salinity / acid sulphate) soils.
- Proposed fill material must comply with Council's Development Control Plan.

8. City Economy

An Economic Assessment Report is required and shall include the following:

- Estimated number of jobs at construction and ongoing
- Types of jobs expected

9. City Design and Public Art

Council notes that public art for the site is planned, developed, designed and integrated in line with consideration of the;

- Western Sydney Aerotropolis Precinct Plan September 2024
- Western Sydney Aerotropolis Development Control Plan 2022 November 2022
- Recognise Country Guidelines for development in the Aerotropolis (RCG); and
- Western Sydney Aerotropolis Plan September 2020 WSAP.

Council notes a requirement for public art that is endemic and reflects local place-based voices for sites within the Aerotropolis in line with planning documents Vision, Objectives, and Requirements.

Council recommends the integration of public art identify future audiences, both transient and static associated with the site (staff visitors) and those affiliated with;

- High biodiversity value area/s
- Active transport networks
- Street Hierarchy
- Transport Corridors

10. Other Requirements for Submission

Appendix D of the Aerotropolis DCP contains a list of Supporting Documents for Development Applications. These requirements are to be considered as part of the SEARs and EIS, and any reports not proposed to be prepared from this list are to be justified.

Supporting Information	Reason
Aboriginal and Historical Archaeological Assessment	Required.
Arboricultural Impact Assessment	Detailed and comprehensive report that reflects the potential impacts of development on trees within and adjacent to a proposed development site. The report should follow and incorporate the data from the Arborist Report.
Architectural Plans	Required. The applicant must provide a set of Architectural Plans complying with Section D.2 Architectural Plans of the Appendix D: Supporting Documentation for Development Application of the Aerotropolis DCP 2022. In addition, the application must include: • All plans must show adjacent street layout and design (despite of those streets not being built). • Precinct plan: Including access, private and public open space, fencing and detailed landscaping within each of the proposed buildings and staging if proposed. • Public vs private open spaces within the site must be identified and must demonstrate the purpose and function of the proposed public spaces and connections with the street network and surrounding public open space including active transport, walking, and cycling. • Solar access analysis. • Detailed schedule of materials and finishes
Architectural renders/ Photomontages	Illustrating how the development sits within the streetscape and include surrounding context, neighbouring properties and how proposed landscaping ties in with the public domain. Views from the blue-green corridor/creek.

Supporting Information	Reason
Access Report	The proposal must demonstrate how the proposal is to satisfy the relevant requirement of the Disability Discrimination Act.
Acid Sulphate Soils Assessment	Required for every development application in accordance with Section 2.5.4 of the WSA DCP 2022.
Acoustic Report	Required.
Air Quality and Odour Assessment	Required
Arborist Report (prepared by a registered Arborist with a minimum AQF Level 5 qualification)	Required to identify significant trees within the site capable of retention.
Aviation Safeguarding Assessment	Must consider all relevant heads of consideration under the "Aviation Safeguarding Guidelines – Western Sydney Aerotropolis and Surrounding Areas
BASIX Certificate	Required.
Biodiversity Development Assessment Report	Required for State Significant Development.
Boarding House Plan of Management	N/A
Building Code of Australia Compliance Report	Required.
Bushfire Report	Required.
Chemical inventory checklist	Dependent on proposed commercial uses.
Contamination Assessment	Required as per comments above.
Connection to Country Statement	Required. The applicant must provide a Connection to Country Statement and Aboriginal Cultural Heritage Assessment Report complying with Section D.1 Aboriginal and Historical Archaeological Assessment and section D.14 Connection to Country Statement of the Appendix D: Supporting Documentation for Development Application of the Aerotropolis DCP 2022. In addition, the application must: • Address development impact on the Song Lines to Thompson Creek and its visual impact in the surrounding Aboriginal culturally sensitive land (high & moderate sensitivity). • Design with Country must inform the building, landscape, public domain design and public art strategy, and delivery and maintenance of the proposed development.
Crime Prevention Through Environmental Design (CPTED) Report	Required.

Supporting Information	**Reason**
Construction Environmental Management Plan (CEMP)	Required.
Dam De-Watering Plan	N/A
Design Verification Statement and ADG Assessment	Required.
Dilapidation Report	Required in relation to any works proposed that will impact on adjoining land or adjoining Council infrastructure.
Earthworks Plan	Required. Detailing the proposed cut and fill strategy, how the design minimises cut and/or fill, and justification for the proposed changes to the landform.
Ecologically Sustainable Development Report	Required.
Economic Assessment Report	Required and must include: • Estimated number of jobs at construction and ongoing • Types of jobs expected
Erosion and Sediment Control Plan	Required.
Flood Impact and Risk Assessment	Required.
Flora and Fauna Assessment	Required under D.23 of the DCP.
Geotechnical Report	Required under D.24 of the DCP.
Heritage Impact Statement	N/A
Interim Travel Demand Management Plan	Development within a 5km catchment of planned transport services must prepare an Interim Travel Demand Management Plan. This plan is to outline how the development will provide interim transport services connecting to existing mass transit services.
Landscape Plans	Required. Must be prepared by a suitably qualified AILA registered landscape architect and include the following: • Landscape analysis • Proposed vegetation positioning • Spacing • Quantity • Pot size • Species • Clear trunk height (1.8m unobstructed – where required) • Canopy coverage (demonstrate consistency with the WSA DCP) • Mature height and spread. • Planting schedule identifying the native, endemic, or exotic status of each species

Supporting Information	Reason
	• Consideration of the Liverpool City Council Draft Tree Management Framework for tree management. • Plan, cross section and details of proposed materiality, height, configuration and extent of proposed fencing (fencing plan) • Plan, cross section and details of proposed materiality, height, configuration and extent of proposed retaining walls (retaining walls plan)
Noise and Vibration Report	Required under D.28 of Appendix D of the DCP.
On-site Sewage Management / Wastewater Report	N/A
Operational Environmental Management Plan	Not required at this stage.
Quantity Surveyors Report	Required for any development with a capital investment value of over $3 million.
Plan of Management	Required.
Plan of Management for Tourist and Visitor Accommodation	N/A.
Pre-clearance native fauna survey (Translocation may require a licence from NSW Environment, Energy and Science under the Translocation Operational Policy)	May be required subject to consideration of detailed plans.
Preliminary Hazard Analysis	Not required at this stage.
Public Art Report and Plan - development greater than 20 hectares or with a capital investment value exceeding $20 million.	Required. All Public Art works must be developed in consultation with Council's Public Art Officer. It is recommended that the public art plan address; • Connecting with Country Framework • NSW Government Creative Communities Strategy • The Ochre Plan • Heritage & Cultural Landscapes; • Remnant Plant Communities listed as critically endangered or endangered; • Contemporary industries;
Public Domain Plan	Public Domain Plan is provided as part of the SSDA submission demonstrating how the development interfaces with the public domain, and the works to be delivered as part of this project. Drawings and annotations should include:

Supporting Information	Reason
	• Clarity as to what is being delivered as part of this project, and what is being delivered by others, what is existing and what is being upgraded • Existing and proposed pedestrian footpath upgrades and embellishment to Council specifications • Proposed street trees at 200L pot size and pit details • Driveway and laybacks including proposed finishes and gradients • Detailed treatments for the safe intersection of footpaths & driveways • Connection paths, linking all pedestrian access points to the public footpath (where applicable) • Existing / proposed kerb and gutter embellishment • Removed existing driveway layback and crossovers no longer used • Landscaping and turf • Existing and proposed road safety barriers • All of the above to Council Specifications • Consistency with the WSA Precinct Plan road network and WSA DCP street sections.
Rail Noise Assessment	N/A
Salinity and or sodicity hazard assessment	Required.
Salinity Management Plan / Detailed Salinity Analysis	Required.
Social Impact Assessment	Required
Statement of Environmental Effects/Environmental Impact Statement	Required
Streetscape elevations	Elevations of the streetscape including neighbouring existing developments and future potential developments demonstrating how the development ties in with its surrounding context
Stormwater Management Strategy	Required
Survey Plan	Required
Transport Impact Statement	A comprehensive transport impact assessment must be provided.
Transport Freight Management Plan	N/A
Travel Plan	A Travel Plan must be submitted for any commercial or industrial development with more than 50 employees. A Travel Plan must include:

Supporting Information	**Reason**
	a. Targets – including reductions in single occupancy car trips and increased mode share for sustainable transport b. Travel data – baseline travel demand and mode share estimates derived from experience with comparable developments. c. Action plan – which outlines the measures to be implemented as part of the travel plan, associated promotional, information and education initiatives, and management mechanisms to be introduced as part of the Green Travel Plan; and d. Commitment – to the on-going maintenance and adaptation of the action plan to ensure its long-term success. Asset managers / strata corporations are to notify any tenants of the Travel Plan.
Tree Protection Plan	N/A
Urban Design Report	• Detailed context analysis of both existing and proposed context. • Site Strategy: Connectivity, access, movement, and activation, including private, public, and active transport. • Design principles • Relation to blue-green infrastructure (relation to Thompsons Creek) • Design with Country • Heritage (Aboriginal and European) • Built form • Public domain: Relation of the development with the collector and local streets, lighting design, pavement design and street furniture. These elements must be designed in accordance with the WS Aerotropolis DCP 2022, WSP Street Design Guidelines and CPTED principles) • Scenic values and vistas • Sustainability
Utilities Plan and Report	Development plans must show, where applicable, the siting of utilities in relation to proposed works and include a risk mitigation strategy for the construction phase and identification of how ongoing access for maintenance will be retained.

Supporting Information	Reason
	A Utilities Infrastructure Assessment is to be provided that identifies existing utilities infrastructure for retention, the availability of assets to accommodate the proposed development and any services augmentation required.
Visual/View Impact Assessment	Required. It must comply with Section D.44 Visual/View Impact Assessment of the Appendix D: Supporting Documentation for Development Application of the Aerotropolis DCP 2022. In addition, the application must include: • Illustrating how the development sits within the streetscape and include surrounding context, neighbouring properties and how proposed landscaping ties in with the public domain. • Views from the blue-green corridor/creek.
Vegetation Management Plan (Required for all sites with riparian areas or where overland flow paths are required to be retained and naturalised	N/A
Warragamba Pipeline Guideline – Consistency Statement	N/A
Waste Management Plan	Required.
Water Management Plan Eradication and Management Plan	Required as per D.47 Appendix D of the DCP.
Weed Eradication and Management Plan (May be included as part of the Vegetation Management Plan)	N/A

Department of Climate Change, Energy, the Environment and Water

Your ref: SSD-99320494
Our ref: DOC25/973200

David Schwebel
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

27 November 2025

Subject: Request for Secretary's Environmental Assessment Requirements (SEARs) for Ferndale Industrial Precinct – Stages 2 and 3 (SSD-99320494) (Liverpool City)

Dear David,

Thank you for your email received on 13 November 2025, requesting input on SEARs for the above State significant development (SSD) from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water.

CPHR has reviewed the *Scoping Report* (Colliers Urban Planning, 17 October 2025) and recommends the proponent address the requirements below and at Attachment A.

Biodiversity

The site contains land subject to the *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (SEPP) and Cumberland Plain Conservation Plan (CPCP). CPHR requires the EIS to clearly map areas of 'certified – urban capable,' 'excluded,' 'avoided' and 'strategic conservation' lands as defined by the CPCP and address the relevant biodiversity requirements.

In accordance with Section 8.4 of the *Biodiversity Conservation Act 2016* (BC Act), an assessment of the likely biodiversity impacts of the development on biodiversity certified land is not required for the purposes of Part 4 of the *Environmental Planning and Assessment Act 1979*.

For all 'avoided' and 'excluded' land under the SEPP and CPCP, a biodiversity assessment must be prepared in accordance with Section 7.9 of the BC Act.

Flooding

CPHR advise the site is not impacted by flooding, therefore no flooding clause is required for the SEARs.

Please contact Greater Sydney Planning team at rog.gsrplanning@environment.nsw.gov.au should you have any queries regarding this advice.

Yours sincerely

Louisa Clark
Director, Greater Sydney Branch
Regional Delivery
Conservation Programs, Heritage and Regulation Group

Attachment A

CPHR Environmental Assessment Requirements – Ferndale Industrial Precinct – Stages 2 and 3 (SSD-99320494) (Liverpool City)

Biodiversity
1. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the *Biodiversity Conservation Act 2016* (BC Act), the Biodiversity Assessment Method 2020 (BAM) and documented in a biodiversity development assessment report (BDAR). The BDAR must include information in the form detailed in the BC Act (s.6.12), *Biodiversity Conservation Regulation 2017* (s.6.8) and the BAM, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations). 2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM. 3. The BDAR must include details of the measures proposed to address the offset obligation as follows: • The total number and classes of biodiversity credits required to be retired for the development/project. • The number and classes of like-for-like biodiversity credits proposed to be retired. • Any proposal to fund a biodiversity conservation action. • Any proposal to make a payment to the Biodiversity Conservation Fund. 4. The BDAR must be submitted with all spatial data associated with the survey and assessment as per the BAM. 5. The BDAR must be prepared by a person accredited in accordance with the *Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017* under s.6.10 of the BC Act.
Cumberland Plain Conservation Plan 6. The EIS must clearly map areas of 'certified – urban capable,' 'excluded,' 'avoided' and 'strategic conservation' lands as defined by the Cumberland Plain Conservation Plan (CPCP) and address the relevant biodiversity requirements.
Waterway Health
7. The EIS must address sections 2.3 Stormwater, Water Sensitive Urban Design (WSUD) and Integrated Water Management and 2.5.5 Erosion and Sediment Control of the *Western Sydney Aerotropolis Development Control Plan*. 8. The EIS, in accordance with the Technical guidance for achieving Wianamatta-South Creek stormwater management targets (DPE, 2022) (Tech Guide), must include a proposed Erosion and Sediment Control plan for construction phase (Chapter 2 in Tech Guide) and a Water and Stormwater Management plan for operational phase (Table 7 of Tech Guide) demonstrating the approach and timing for meeting stormwater quality and quantity targets. 9. To demonstrate the construction phase stormwater quality targets are met, a detailed ESCP should: • be developed and certified by a Certified Professional in Erosion and Sediment Control (CPESC) or a qualified and experienced civil engineer with at least 5 years' experience in the development of site-specific soil and water management plans • illustrate appropriate controls, that when implemented will achieve the construction phase stormwater quality targets in Table 2 of the Tech Guide • be prepared in accordance with the Blue Book (NSW Government, 2004)

- be prepared in accordance with the WSUD design considerations set out in Chapter 3 of the Tech Guide (especially WSUD measures)
- provide conceptual designs that include the site, catchment and key features of the ESCP on scaled drawings.

10. As the site area is larger than 2,500m^2, the Tech Guide provides best practice initiatives strengthening the elements in the Blue Book. This involves designing and implementing sediment controls that treat at least 80% of the average annual runoff volume (i.e. 80% hydrological effectiveness) to 50 mg/L TSS or less, and pH in the range 6.5–8.5. To achieve these construction phase targets, the design of the basins generally needs to:
    - be sized and operated in accordance with either a Type-A or Type-B sediment basin as documented in Best Practice Erosion and Sediment Control (International Erosion Control Association (IECA),2008)
    - be provided with an automated system of flocculant dosing and a suitable supply of flocculant/coagulant, with the type of flocculant/coagulant determined based on the IECA chemical coagulants and flocculants fact sheet (IECA 2018)
    - have markers within each basin to show the maximum sediment storage level and any additional water storage capacity for water reuse
    - limit discharge from the primary outlet system to 50 mg/L TSS, with a pH within the range of 6.5–8.5
    - be operational before any disturbance occurs in the catchment upslope of the basin.
11. Include MUSIC modelling file/s of the stormwater management design (Chapter 2 and Appendix A of Tech guide) (see also Wianamatta MUSIC modelling toolkit).
12. Include detailed drawings (interim and final) of the stormwater treatment train and proposed WSUD approach for achieving the stormwater targets
13. The EIS provides an assessment of any impacts on salinity and sodic soils.

Water and soils

14. The EIS must map the following features relevant to water and soils including:
    - Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
    - Rivers, streams, wetlands, estuaries (as described in s.4.2 of the BAM).
    - Wetlands as described in s.4.2 of the BAM.
    - Groundwater.
    - Groundwater dependent ecosystems.
    - Proposed intake and discharge locations.
15. The EIS must describe background conditions for any water resource likely to be affected by the development, including existing surface and groundwater.
16. The EIS must assess the impact of the development on hydrology, including:
    - Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
    - Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.

End of Submission

Transport for NSW

24 November 2025

TfNSW Reference: SYD25-00751/02
DPHI Reference: SSD-99320494

Ms. Kiersten Fishburn
Secretary
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2150

Attention: David Schwebel

REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)
STAGES 2 & 3 INDUSTRIAL DEVELOPMENT - (WESTERN SECTION OF AEROTROPOLIS)
275 ADAMS ROAD, LUDDENHAM

Dear Ms Fishburn,

Thank you for providing Transport for NSW (**TfNSW**) an opportunity to provide input to the Secretary's Environment Assessment Requirements (**SEARS**) for the proposed development at 275 Adams Road, Luddenham.

TfNSW has reviewed the Scoping Report (prepared by Ethos Urban on 17 October 2025 and provides assessment requirements and comments in **TAB A** for the consideration of the Department of Planning, Housing and Infrastructure (**DPHI**).

Should you have any questions regarding the above matter, please contact Nav Prasad, Land Use Planner, via email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

Brendan Pegg
Senior Manager Land Use Assessment Central and Western
Transport Planning Branch
Planning, Integration and Passenger Division

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
PO Box 973 Parramatta CBD NSW 2124
W transport.nsw.gov.au

TAB A – TfNSW Assessment Requirements and Comments

1. *Transport Impact Assessment (**TIA**)*: A TIA shall be prepared in accordance with the *Guide to Transport Impact Assessment* (**GTIA**). GTIA replaces the Guide to Traffic Generating Developments and can be found at this link. The TIA will enable TfNSW to understand the impacts the development may have on the transport network, as well as the impacts to the state classified road network resulting from increased vehicular, bus and pedestrian/active transport movements. The TIA must include, but not be limited to, the following:

    - Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development; and
    - Measures to integrate the development with the existing/future public transport network.
    - A review of the crash data along the identified transport route/s and key nearby intersections for the most recent 5-year reporting period and an assessment of the safety implications of the proposed development and required mitigation measures.
    - Details of the site access and pedestrian network and parking provision associated with the proposed development, in accordance with the relevant Australian Standards, Austroads Guide and Council's Development Control Plan (**DCP**).
    - An assessment of the predicted impacts of development traffic on road safety and the capacity of the road network, including consideration of cumulative impacts of nearby approved developments at the intersection of Adams Road and Elizabeth Drive, and Adams Road and The Northern Road using SIDRA or similar traffic model (further details at point 2 below).
    - Identification of the necessary road network infrastructure upgrades (e.g. signage, pedestrian facilities, intersection upgrades, etc.) at the above-mentioned intersections that are required to mitigate the development impact on the classified road network, in terms of safety and efficiency for both vehicles and pedestrians. Any proposed intersection upgrades on at the above-mentioned intersections should consider the broader growth planned for the precinct. Any required/proposed road network infrastructure upgrades/mitigation measures along Elizabeth Drive and The Northern Road should be developed in consultation with TfNSW.
    - Plans demonstrating how all vehicles likely to be generated during construction can be accommodated on the site to avoid impacts to the transport network. A preliminary Construction Transport Management Plan (**CTMP**) should be prepared as part of the TIA to mitigate any such impacts.
    - TfNSW encourages the proposal to minimise the reliance on car usage through providing minimal parking spaces and the implementation of Travel Demand Management (**TDM**) measures.
    - Details of TDM measures to be utilised to minimise the development impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and/or specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site.

2. *Traffic Modelling:* Detailed traffic modelling (e.g. SIDRA) will be required to document the impact of the proposed development on the existing and proposed road network with an existing base and a +10-year background traffic growth scenarios, with and without the proposed development, for weekday AM, PM and weekend peak periods.

    At a minimum, the traffic modelling should include the following intersections:
    - Adams Road and Elizabeth Drive, and
    - Adams Road and The Northern Road

    Modelling undertaken must include, but not be limited to, the following:
    - Be based on current traffic counts;
    - Ensure the base model is calibrated with on-site observations (e.g. queue lengths, delays). Details on the calibration undertaken must be provided;
    - Details of any default settings that have been changed, along with supporting justification for each change; and
    - Ensure the electronic copies of all modelling files are provided to TfNSW for review.

    SCATS data for signalised intersections can be requested via SCATS.Traffic.Signal.Data@transport.nsw.gov.au.

3. Any proposed works at the traffic signals at the intersection of The Northern Road / Adams Road would require approval from TfNSW under section 87 of the *Roads Act 1993*. As part of the application for signal works approval (if applicable) , traffic modelling and a concept design of the proposed intersection works shall be submitted to TfNSW for review and endorsement, to demonstrate that the proposed works can be accommodated (and designed) without adverse impacts to the operation of the state classified road network. The concept design shall be prepared in accordance with the TfNSW Strategic Design Requirements fact sheet, which can be found at this link.

    The traffic modelling should include, but not be limited to, the assessment of the following scenarios for the proposed intersection configuration:

    - Pre- Development – Existing base case AM and PM peak hour models

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- Post development – Existing + development AM and PM peak hour models

TfNSW recommends that the traffic modelling and concept design be submitted to TfNSW for review during the early stages of the project development. TfNSW is willing to meet with the Applicant to discuss the appropriate access strategy and intersection design for the proposed development.

4. *Active Transport*: The development should ensure its design is reflective of the Connecting Strategy and the NSW Active Transport Strategy, including, but not limited to:

   - Delivering integrated land use and transport planning, connecting people to their local metro centre and strategic centres within 30 minutes by public transport;
   - Enable 15-minute neighbourhoods;
   - Deliver connected and continuous cycling networks; and
   - Promote safer and better precincts and main streets.

5. *Car Parking*: As the site will be well serviced by rail, and bus and will benefit from the proximity to the public transport network, consideration should be given to ensuring that car parking provisions are consistent with the requirements identified in GTIA.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
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W transport.nsw.gov.au

Department of Climate Change, Energy, the Environment and Water

Our ref: HMS ID 12543

David Schwebel
Department of Planning, Housing and Infrastructure
david.schwebel@planning.nsw.gov.au

Letter uploaded to the Major Projects Planning Portal

Input to SEARs – State Significant Development

Proposal: Ferndale Industrial Precinct - Stages 2 and 3

Major Project reference: SSD-99320494

Received: 13 November 2025

Dear Mr Schwebel,

Thank you for your referral seeking input to the Secretary's Environmental Assessment Requirements for the above State Significant Development proposal. In preparing this advice Heritage NSW has reviewed the provided scoping report. Heritage NSW recommends that the following Secretary's Environmental Assessment Requirements be included with respect to Aboriginal cultural heritage in relation to the proposed Ferndale Industrial Precinct - Stages 2 and 3 (SSD-99320494)

- The Environmental Impact Statement should be informed by an Aboriginal Cultural Heritage Assessment Report, prepared in accordance with relevant policy and guidelines to identify, describe and assess any impacts to Aboriginal cultural heritage sites or values associated with the project. The Aboriginal Cultural Heritage Assessment Report must be prepared in accordance with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* https://www.environment.nsw.gov.au/publications/guide-investigating-assessing-and-reporting-aboriginal-cultural-heritage-new-south-wales and the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* https://www.environment.nsw.gov.au/publications/code-practice-archaeological-investigation-aboriginal-objects-nsw , including results of archaeological survey and test excavations (where required) undertaken in accordance with the relevant standards and requirements;
- Include evidence of adequate and continuous consultation with Aboriginal parties in relation to determining and assessing impacts, identifying and selecting options for avoidance of Aboriginal cultural heritage and identifying appropriate mitigation measures (including the final proposed

measures) in substantial compliance with the consultation process outlined in the *Aboriginal cultural heritage consultation requirements for proponents* https://www.environment.nsw.gov.au/publications/aboriginal-cultural-heritage-consultation-requirements-proponents

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact Alison Lamond at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Alison Lamond

Alison Lamond
Manager
Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*

25 November 2025

Western Sydney International Airport

27th November 2025

Dear David,

Thank you for the opportunity to comment on the SEARs (SSD-993204094) for the development of two (2) warehouses at 275 Adams Road, Luddenham. This application is within Stages 2 and 3 of the Ferndale Industrial Precinct and seeks approval for the following works:

- Construction and operation of two (2) warehouses (including offices) with 24/7 operations
- Supporting infrastructure including a collector road
- Landscaping
- Signage

It is noted that this referral is for the Scoping report and that WSI will have further opportunity to comment on the EIS when on public exhibition.

WSI requests that the following matters be considered in the preparation of the Environmental Impact Statement (EIS):

Matters to be Addressed	Comment
Planning Controls	The SSD application needs to address Chapter 4 of the *State Environmental Planning Policy (Precincts – Western Parkland City) 2021,* the Aerotropolis Development Control Plan (DCP) and Aviation Safeguarding Guidelines.
Airport Safeguarding	Given the site's location and the airport safeguarding layers applied to the site, it is recommended that an Aviation Impact Assessment (AIA) be undertaken. The AIA is to address specifically the following: • Aircraft Noise • Wildlife Hazards • Lighting • Reflectivity • Airspace Protection • Navigational Aids
Aircraft Noise	The development area is in the 25-30 ANEC. Buildings will need to be designed to comply with Australian Standard 2021: 2015, including indoor sound levels.
Wildlife Hazards	The site is within the 0-3km wildlife buffer area. An assessment of wildlife attraction and bird strike risk should be undertaken. In preparation of the application consideration must be given to:

Western Sydney International Airport

	• the landscape design and species selected, to ensure that wildlife attraction risk is adequately addressed and mitigated in accordance with the DCP. • waste management measures should be detailed, including measures to mitigate wildlife attraction (e.g. storage of waste indoors, etc.). • Riparian zone operation and management.
Lighting	The site includes areas located within Lighting Intensity Zones C and D. An assessment of lighting needs to be included in the Aviation Impact Assessment/SSD, to demonstrate that proposed lighting at the site is acceptable and does not distract pilots. It should be noted that this assessment would also need to be undertaken in regard to construction lighting and lighting uses on the proposed collector road.
Reflectivity	Should the proposal include solar panels or use materials that would be reflective, a Glint and Glare Study would be required.
Airspace Protection	The EIS should clearly detail the ground level RLs as well as the maximum building heights (including any rooftop plant and equipment) proposed to enable an assessment of the potential impacts to protected airspace. Should the proposal have the potential to impact the prescribed airspace the proposal will need to assess the development's potential impacts on the OLS, during construction and operation. It should be noted that the *Airports Act 1996* covers any intrusions into prescribed airspace, which could include: a. constructing permanent structures, such as buildings, into the protected airspace; b. temporary structures such as cranes protruding into the protected airspace; or c. activities causing non-structural intrusions into the protected airspace such as air turbulence from stacks or vents, smoke, dust, steam or other gases or particulate matter. Note: Emissions from mechanical ventilation systems may impact on protected airspace if the velocity of emissions is greater than 4.3m/s at point of emission or protected surface. If it is likely that any of the above components would result in an impact on protected airspace, then approval will need to be obtained in accordance with the *Airports Act 1996* and the *Airports (Protection of Airspace) Regulations 1996*.

Western Sydney International Airport

Crane use impact on prescribed airspace	Construction cranes may be required to operate at a height significantly higher than that of the proposed development causing intrusion into prescribed airspace and consequently, may not be approved under the Airports (Protection of Airspace) Regulations. Approval to operate construction equipment (i.e. mobile and tower cranes) in the prescribed airspace should be obtained prior to any commitment to construct. Controlled Activity enquiries and applications should be directed to airspaceprotection@wsiairport.com.au
Navigational Aids	The site is located within the Localiser Building Restricted Area. An assessment of whether the proposal will impact on this navigational aid is to be undertaken. WSI will refer the EIS to Airservices Australia when it goes on public exhibition.
PANS-OPS	The PANS-OPS is not finalised and Airservices Australia will need to assess the development against the PANS-OPS. It should be noted that under the Airports (Protection of Airspace) Regulations permanent intrusions are prohibited and temporary intrusions are limited to three (3) months. WSI will refer the EIS to Airservices Australia when it goes on public exhibition.
Waste Management	A Waste Management Plan prepared by a suitably qualified consultant must be provided that addresses the following: • The design and management of waste storage areas/receptacles during construction and operational phases. • Handling and storage of putrescible waste, particularly in external areas. • Any compost areas for food waste. • Monitoring and management of any wildlife. • Foreign Object Debris not leaving the site
Development Staging	Timeframes should be detailed for subsequent stages of operations. Noting that the Airport will become operational in 2026, confirmation is required of the timeframes for subsequent stages of development at the site.
Traffic	Construction and Operation A Traffic Impact Assessment should be included in the EIS and should address the full development of the site. The assessment should include: • Traffic modelling, including forecast traffic volumes • Analysis of the performance of key intersections

Western Sydney International Airport

	The assessment should take into account the current and future traffic conditions (including future airport growth).
Flooding	Given the activity on the site and the ground level changes, the proposal is to address whether there would be any impact on flooding behaviour around or on airport land.

Should you have any further question or clarifications regarding the above please contact planning@wsiairport.com.au.

Australian Government
Civil Aviation Safety Authority

AIR NAVIGATION, AIRSPACE AND AERODROMES BRANCH

CASA Ref: F24/42421-39

Your Ref: SSD-99320494 Email Thu 13/11/2025 3:49 PM

David Schwebel david.schwebel@planning.nsw.gov.au
DPHI
NSW Submit on Major Projects Portal

Major Projects - Industrial Development at Ferndale near Western Sydney Airport
CASA Comments on SEARs

CASA has reviewed the 17 October 2025 Scoping Report for the Ferndale Industrial Development by Colliers Urban Planning. The Scoping Report indicates Building Height 14.6m (not including rooftop plant and equipment). It is assumed to be 14.6m 'Above Ground Level'.

For developments near Airports, CASA recommends assessment using the NASF Guidelines (or a NSW Planning equivalent). Although NASF Guidelines D, H and I will not be applicable and some other guidelines will be covered off very simply. If there is Resource Recovery, Guideline C could be important. It is noted that 'No assessment of operational air quality is warranted as the proposed warehouse uses do not involve any activities that involve combustion or the handling of dust-generating materials.'

A detailed Aviation Impact Assessment is not required for this standard low-rise development. However, CASA suggests input to SEARs along the lines: The EIS should cover WSI Airport Operations in line with the NASF Guidelines (or equivalent NSW Planning Policy).

Yours sincerely

David Alder

David Alder

Aerodrome Engineer

20 November 2025

2 December 2025 **Our reference**: 229280

David Schwebel
Senior Planning Officer
Department of Planning, Housing and Infrastructure
david.schwebel@planning.nsw.gov.au

RE: Sydney Water input to SEARs for SSD-99320494 275 Adams Road, Luddenham

Ferndale Industrial Precinct Stages 2 and 3 (Coombes Property Group)

Thank you for seeking Sydney Water's input on the Secretary's Environmental Assessment Requirements for the SSD-99320494 at 275 Adams Road, Luddenham, within the Agribusiness Precinct of the Western Sydney Aerotropolis. The development comprises Stages 2 and 3 of the Ferndale Industrial Precinct and will seek consent for the following:

- Site preparation and infrastructure works, including stormwater management and site servicing infrastructure
- Construction and operation of two warehouse and distribution centres comprising:
  - A warehouse on the northern portion of the site comprising a total GFA of 6,580m^2, containing one tenancy
  - A warehouse on the southern portion of the site comprising a total GFA of 10,800m^2, across up to six different tenancies
- Construction of a 25.6m wide Public Collector Road and a Private Access Road
- Hardstand areas and on-lot parking for 122 car parking spaces
- Landscaping and pylon and façade signage.

The proposed warehouses will be located along the western boundary of the broader quarry site, an area currently inactive and not associated with the site's existing operations as a shale quarry or resource recovery facility (Stage 1 of the Ferndale Industrial Precinct).

Sydney Water requests that the Department of Planning, Housing and Infrastructure (the Department) include the following Secretary's Environmental Assessment Requirements relating to the provision of water-related services for the subject site:

Water-related Infrastructure Requirements

1. The proponent of the development should determine service demands following servicing investigations and demonstrate that satisfactory arrangements for drinking water, wastewater, and recycled water (where required) services have been made.
2. The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed development does not adversely impact on any existing water, wastewater or stormwater main, or other Sydney Water asset, including any easement or property. To do this, **the proponent should register a direct Feasibility** enquiry with Sydney Water as soon as possible via an approved Water Servicing Coordinator (WSC) to ascertain servicing needs and to ensure the proposed development is considered in any potential planning, land requirements, existing or future easements that we might be undertaking or investigating.

3. When determining landscaping options, the proponent should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes and therefore should be avoided.
4. The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.
5. Strict requirements for the protection of Sydney Water's stormwater assets may apply to this site. The proponent should ensure that satisfactory steps/measures been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets.
6. Development in Aerotropolis areas must consider stormwater and integrated water cycle management in accordance with the Sydney Water Regional Stormwater Scheme. Additional infrastructure requirements will apply. See the Stormwater and Integrated Water Cycle Management section below for detailed information.

Stormwater and Integrated Water Cycle Management

Sydney Water is the Regional Stormwater Authority for the Aerotropolis Precincts. Sydney Water has undertaken integrated water cycle management (**IWCM**) planning for this precinct which details the infrastructure necessary to support the delivery of a regional stormwater management system, integrated with the recycled water network (**Regional Integrated Stormwater Scheme**). Regional stormwater infrastructure for this Scheme comprises natural creek lines, naturalised trunk drainage channels, consolidated treatment and stormwater harvesting basins, final polishing, and recycled water distribution system. Connection to the Integrated Stormwater Scheme is required and will enable development in the precinct to meet the NSW Government stormwater quality and flow targets, as well as the NSW Government parkland city objectives.

Aerotropolis Draft Integrated Stormwater Scheme Plans for Wianamatta-Badgerys catchments, Cosgroves catchment and Duncans-Mulgoa catchments were released for public exhibition earlier this year and are in the process of finalisation. More information about the scheme can be found here.

The proponent should outline the development's projected potable and non-potable water demands and any sustainability initiatives that will minimise/reduce the demand for drinking water. This will allow Sydney Water to determine the impact of the proposed development on our existing services and required system capacity to service the development.

Sydney Water encourages high non-potable water demands within the Aerotropolis and Mamre Road Precincts which must be met through the development's connection to the Regional Stormwater Scheme recycled water network.

To demonstrate compliance with the regional integrated stormwater servicing approach, the development must:

- demonstrate the integration of any planned regional stormwater infrastructure on the development site as per the Cosgroves Scheme Plan
- ensure it complies with the relevant DCP requirements for:
    - pervious area/percentage,
    - provide gross pollutant traps to service the development,

    - provide passively irrigated street trees on all public roads,
- demonstrate a commitment to connect to the regional stormwater scheme,
- respond to the relevant stormwater requirements in the Draft Scheme Infrastructure Design Guideline (Sydney Water, 2024),
- demonstrate compliance with the Technical guidance for achieving Wianamatta - South Creek stormwater management targets (DPE, 2022) for both construction and operational phases **(including for interim periods before the Regional Stormwater Scheme is available).**
- Provide appropriate access to all trunk drainage corridor land on the development site (including waterways and riparian corridors as mapped in the Mamre Road Precinct Stormwater Scheme Plan) under section 88A and/or restriction or public positive covenant under section 88E of the Conveyancing Act 1919.

The proponent must provide documentary evidence that the proposal has been through a Feasibility assessment with Sydney Water to secure endorsement of the proposed stormwater management strategy, including the delivery of any regional stormwater infrastructure. The evidence should include details of:

- Allocation, design and layout of stormwater assets including trunk drainage channels and wetlands/basins where relevant,
- Consistency with the relevant stormwater Scheme Plan or endorse of any proposed variations to the Scheme Plan,
- Delivery of any regional stormwater assets and proposed reimbursement by Sydney Water for the delivery of these assets.

Should satisfactory evidence not be provided with the application, the application may not proceed to exhibition.

From the review of the information provided, Sydney Water notes that the site has a dedicated catchment area that treats its stormwater in basin Ag_CC09 located within the site itself. The catchment boundary is highlighted in red in the map below.

It is also noted that Ag_CC09 is located on Cumberland Plain Conservation Plan (CPCP) avoided land. The proponent must submit a request to Sydney Water for a Part 5 approval pathway for the construction of Ag_CC09 on CPCP avoided land. A Sydney Water fact sheet on planning approval pathways for regional stormwater infrastructure is enclosed.

The construction of Ag_CC09 will require the dewatering of a dam that is located on both Combes Property and Federal Airport land. Sydney Water can facilitate the communication with Western Sydney Airport to support the dewatering of the dam.

It is advised that the proponent submits a **Feasibility application** to Sydney Water, which will enable detailed review of the proposal.

Growth information

Sydney Water supports government-backed growth initiatives within our area of operations, striving to provide timely and cost-effective water and wastewater infrastructure without undue impacts. To offer robust servicing advice and investigate staged servicing possibilities, we require **anticipated ultimate and annual growth data** for this development as outlined in the enclosed Growth Data Form.

A **Feasibility application** will enable a comprehensive servicing review ensuring the proposed development is considered in any potential planning that we might be undertaking. Failure to provide this information may impede proper planning requirements for the proposed development and for the broader area. The completed growth form should be submitted by the proponent to Sydney Water as part of the Feasibility application via a Water Servicing Coordinator (WSC), citing this referral response and our reference number.

Next steps

- Due to the scale and complexity of the proposed development, further investigations will be required to determine the servicing requirements for this site. It is recommended that a Water Servicing Coordinator is engaged as soon as possible, and a **Feasibility** application is submitted with Sydney Water prior to the preparation of the EIS.
- The proponent should complete and return the enclosed Growth Data Form as part of their Feasibility application submission. The Growth Data Form should be updated promptly with Sydney Water in case of changes.
- The Department is advised to forward the enclosed *Sydney Water Development Application Information Sheet (for proponent)* to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides information on Infrastructure Contributions.

If the proponent has any questions, they should contact their Sydney Water case manager once a Feasibility is lodged. Should the Department require further information, please contact Fiona Feng from the Growth Analytics Team at urbangrowth@sydneywater.com.au.

Yours sincerely,

Kristine Leitch
Manager, Growth Analytics and Strategic Partnerships
Growth and Development
Water and Environment Services
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Enclosed:

- Sydney Water Fact Sheet – Regional Stormwater Planning Approvals
- Sydney Water Development Application Information Sheet (for proponent)
- Sydney Water Growth Data Form

Sydney Water Development Application Information Sheet for Proponent

Sydney Water has provided advice to the Department/Council on your proposed development. Further steps are required before Sydney Water connections and final approvals can be granted. Without relevant Sydney Water approval, your Subdivision Certificate, Occupation Certificate or Construction Certificate, may not be issued. Please read the information below to assist with your development. Further information can also be found on our website (sydneywater.com.au).

Building Plan Approval

Why have I been advised a Building Plan Approval is required?

Demolition, excavation, construction or modification to existing buildings and structures all have the potential to damage or limit access to our water, wastewater or stormwater services. That's why we need to review and approve your building plans before you start any work. In many cases, you need a Building Plan Approval before council can allow you to start demolishing or constructing.

How do I apply for a Building Plan Approval?

The approved plans must be submitted to the Sydney Water Tap in® online service to determine whether the development will affect any Sydney Water wastewater, water, stormwater mains and/or easement, and if further requirements need to be met.

Sydney Water recommends you apply for Building Plan approval early as in some instances a detailed engineering assessment would be required when building over or near our critical assets. This can be a lengthy process and may also impact development designs.

You will be required to pay Sydney Water for the costs associated with any detailed review.

Section 73 Compliance Certificate

Why have I been advised a Section 73 application is required?

If you are developing or subdividing land and needing water or wastewater, you may need to apply for a Section 73 Compliance Certificate before council can issue an Occupation or Subdivision Certificate.

If we have noted a requirement for a Section 73 Compliance Certificate in our advice to Council, one must be obtained from Sydney Water under the *Sydney Water Act 1994*. These include secondary homes or granny flats in an area with Priority Sewerage Scheme or with a GFA greater than 60 m^2.

How do I apply for a Section 73 Compliance Certificate?

You can choose to use a water servicing coordinator for works of any size. If you only have minor works, you can apply directly through Sydney Water Developer Direct.

We suggest you lodge an early application for the certificate, as there may be additional connections or pipes to be built or additional steps to protect our existing assets. This can also impact other services, buildings, driveways, or landscape designs.

Feasibility

Why have I been advised to carry out a Feasibility enquiry?

If the development presents potentially large water servicing demands on drinking water, wastewater, recycled water and stormwater where applicable or asset impacts are anticipated, further investigation may be required to determine the servicing requirements for the site.

It is recommended that a Water Servicing Coordinator is engaged to also ensure early discussion on your proposed development so it is considered in any potential planning that we might be undertaking. We advise you do this as soon as possible to prevent potential delays to your development approvals or servicing.

How do I apply for a Feasibility?

To apply for a Feasibility, you will need to contact a Water Servicing Coordinator. Tell them you have been advised to lodge a Feasibility as part of your development application.

Growth Data Form

Why do I need to complete a Growth Data Form as part of the Feasibility application?

If you have been requested to provide growth data, it is likely your planning proposal may lead to development with significant servicing needs, especially or in areas not previously identified for substantial growth.

To ensure thorough servicing advice and explore staged servicing options, we need anticipated growth data and **indicative** development staging, including yield per stage, as specified in the Growth Data Form in Appendix 1 of this information sheet.

Infrastructure Contributions

What are infrastructure contributions?

Infrastructure contributions are a payment towards the cost of infrastructure needed to provide water-related services.

How do infrastructure contributions impact me?

Infrastructure contributions are payable for all properties that connect or upgrade a connection to our systems. The contributions are being gradually reintroduced such that they were capped at 25 percent in 2024-25 and 50 percent in 2025-26, with full contributions payable from 1 July 2026 onwards, in line with a transition plan approved by the NSW Government.

You can find more information on infrastructure contributions at Land development.

I am building in the Western Sydney Aerotropolis Precincts. How does this impact me?

The NSW Government has appointed Sydney Water as the Regional Stormwater Authority in the initial Western Sydney Aerotropolis precincts, including the Mamre Road Precinct.

If you are building in the Aerotropolis Initial Precincts, you will be required to pay infrastructure contributions towards Sydney Water's stormwater and recycled water servicing. The estimated amount of contributions for stormwater and recycled water servicing will be provided at the Notice of Requirements issued during the Section 73 application.

You can find more information on Mamre Road and Aerotropolis Infrastructure Contributions at Mamre Road and Aerotropolis development.

Water Servicing Coordinator

What is a Water Servicing Coordinator?
Water Servicing Coordinators are accredited providers who can manage your Sydney Water applications for you.

They can design new pipes, manage applications for Section 73 Compliance Certificates and Feasibilities, applications for approval to move or extend our pipes, design and construction of new pipes, and applications for approval to build over or next to assets.

All Water Servicing Coordinators have designer accreditation and can provide design services.

How do I find a Water Servicing Coordinator?
Please follow this link to find a list of Water Servicing Coordinators: Water servicing coordinators

Trade wastewater for business customers

I am a business customer and my development may generate commercial or industrial trade wastewater. What do I do?

If your development is going to generate trade wastewater, you must have written approval to connect your business to our network, and properly install and maintain appropriate treatment equipment before any business activities can commence. It is illegal to discharge trade wastewater into the Sydney Water sewerage system without permission.

How to apply for approval to discharge?

Complete an application for connection to discharge trade wastewater at Sydney Water Tap in® or contact businesscustomers@sydneywater.com.au for further information.

Data Centres

What is a Data Centre?

According to the *Local Environmental Plan Standard Instrument*, data centre means a building or place the principal purpose of which is to collect, distribute, process or store electronic data using information technology.

Refer to Appendix 2 for Sydney Water's requirements for Data Centre applications regardless of the approval pathway undertaken.

Capacity

Water service availability may change with development and demand. Sydney Water does not reserve capacity in advance, so proponents should apply for a Section 73 Compliance Certificate as early as possible.

Quick Links

- Building plan approvals
- Section 73 Compliance Certificates
- Steps for first time developers
- Water servicing coordinators
- Land development
- Managing trade wastewater
- Growth Servicing Plan
- Mamre Road and Aerotropolis development

Appendix 1. Example of growth data form

The following is an example of the level of intel that we require to assess the potential staging and phasing of asset upgrades. We acknowledge that this information is an indication only and is provided as a guide to assist Sydney Water to provide more nuanced feasibility or servicing advice. We note that timescales are often subject to developer intent/demand and approval timescales. Sydney Water uses the information at its own risk.

Anticipated growth timescales													
Project name:	*Address:*		*Sydney Water Ref. Number and DA Ref Number:*										
Development Type	Ultimate growth (additional)	Total # stages	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Continue as required
Example (dwelling multi)	*2050*	*5*	*0*	*0*	*350*	*350*	*500*	*500*	*350*	*0*	*0*	*0*	
Example (job number)	*1600*	*6*	*0*	*200*	*200*	*300*	*300*	*300*	*300*	*0*	*0*	*0*	
Dwellings (single)													
Dwellings (multi)													
Jobs (number)													
Jobs (GFA)													

Appendix 2. Data Centres

What is required by Sydney Water when developing a Data Centre?

Due to the significant water consumption used by data centres, Sydney Water requires the following information to be submitted to progress all data centre applications regardless of the approval pathways undertaken.

Required information	Details
Water service demands	1. Water service demands following servicing investigations and demonstrate that satisfactory arrangements for drinking water, wastewater, and recycled water or non-potable water services have been made. This should be progressed via a Sydney Water Feasibility application. a. The following information is required: i. Staging of developments showing yearly 1. Average Day Demand 2. Maximum hour demand (to understand impact on the network during peak hour) 3. High demand days (e.g. 95th percentile or those high demand 5 to 10 days per year) 4. Maximum daily demand (Peak day - 1 in 10 year) ii. One of the following (for ultimate development as a minimum) 1. Expected daily usage over a year 2. Expected monthly average daily usage over a year iii. Daily diurnal usage based on a high demand day. The preferred usage pattern should reflect the draw from Sydney Water's mains and not the internal usage. However, understanding the internal water usage can provide insight to Sydney Water on potential draws from the system and demonstrate that the applicants have leveraged water efficiency opportunities and recycling within their operation as appropriate.

Regional Stormwater Planning Approvals

Planning approval pathways for regional stormwater infrastructure in the Aerotropolis and Mamre Road Precincts

Purpose of this fact sheet

This fact sheet provides guidance on planning approval pathways for the delivery of regional stormwater infrastructure (RSI) on behalf of Sydney Water. RSI includes Sydney Water basins, wetlands and storage ponds, we well as trunk drainage channels as mapped in relevant Stormwater Scheme Plans.

This fact sheet applies to land within the declared stormwater catchments of the Aerotropolis and Mamre Road Precincts.

Context

Sydney Water is the Regional Stormwater Authority in the Aerotropolis initial precincts and the Mamre Road Precinct. This means that Sydney Water is responsible for delivering, operating and maintaining the integrated regional stormwater network in these areas, along with drinking water and wastewater.

Sydney Water recognises that developers are often best placed to deliver this RSI on our behalf and that significant efficiencies can be gained through combining RSI with other development.

The aim is to allow for developer delivered regional stormwater infrastructure to be assessed and approved in the most efficient way.

Planning Pathways

There are two possible pathways for RSI to be assessed and approved in the Aerotropolis and Mamre Road Precincts.

Part 4 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act)

RSI can be assessed as development with consent under Part 4 of the EP&A Act 1979 either through a local development application to the relevant Council, or as part of a state significant development application (SSDA) to the NSW Department of Planning, Housing and Infrastructure (DPHI).

Part 5 of the NSW Environmental Planning and Assessment Act 1979

RSI can also be assessed as an 'activity' under Part 5 of the EP&A Act. State Environmental Planning Policy (Transport and Infrastructure) 2021 (TI SEPP) allows for RSI to be delivered as 'development without consent' in some circumstances. This requires the infrastructure to meet the definition of a 'stormwater management system' under the TI SEPP and for the infrastructure to be delivered by or on behalf of Sydney Water. This pathway requires the preparation of a Review of Environmental Factors (REF) which is assessed and determined by Sydney Water. The REF may be prepared by Sydney Water or by the developer, on behalf of Sydney Water.

Which pathway is appropriate?

Consistent with Sydney Water's existing approach to water and wastewater infrastructure, in many cases the most efficient planning approval pathway is through the integration of RSI into a development application or SSDA (Part 4 of the EP&A Act). This is because combining it with a development allows opportunities to balance earthworks (cut and fill) across a site, avoids duplication of specialist studies, licences and permits and allows contractors to work under a single Construction Environmental Management Plan (CEMP). It also allows for the RSI to be approved and commenced at the same time as the development, avoiding potential delays to construction timeframes. This is important as in many cases, RSI will need to be in place before development of the site can commence to ensure compliance with relevant environmental stormwater targets.

However, there are some circumstances where assessment under Part 5 of the EP&A Act is appropriate and necessary to facilitate the efficient delivery of infrastructure.

If the proposed RSI cannot feasibly be assessed and approved under Part 4 of the EP&A Act, the developer must submit a written request through their Water Servicing Coordinator (WSC) asking for the infrastructure to be assessed under Division 5.1 of the EP&A Act and addressing the following key criteria in relation to the proposal (Note: the project does not have to meet every one of the criteria for it to proceed through a Part 5 process):

- The proposed RSI is isolated/distant from the development site.
- The proposed RSI is on land which is not owned by the developer and landowner's consent is not readily obtainable.
- The Minister for Planning (via DPHI) has determined that the proposed RSI cannot proceed as part of an SSDA.
- The proposed RSI would have potential impacts on Cumberland Plain Conservation Plan (CPCP) avoided land (including potential for construction impacts) and a local development application is not a viable planning pathway.
- The proposed RSI would require modification to two or more existing development consents and/or require consent from more than one consent authority.
- The proposed RSI comprises a strategic network/ cluster of basins which is required to facilitate timely development.
- In some cases, where an Aerotropolis Master Plan has been approved and development is proceeding through a complying development pathway.

In addition to addressing the above criteria the letter must demonstrate that:

- The proposed RSI fits the definition of a 'stormwater management system' under the TI SEPP and is deemed to be permissible without consent.
- Consultation has taken place with Sydney Water's regional stormwater team in relation to the proposed RSI and it has been agreed that the proposed RSI will be delivered by the developer on behalf of Sydney Water.

Once Sydney Water has reviewed the written request, confirmation will be provided in writing on the agreed planning pathway. In making the decision, Sydney Water will consider a combination of the above criteria, noting that a single criteria alone may not be mean that a Part 5 approval pathway is the most appropriate.

It should be noted that any RSI proceeding through a Part 5 pathway would require rigorous environmental assessment in accordance with Sydney Water standards and specifications. Developers would be required to engage a suitably qualified consultant to prepare all documentation, using Sydney Water templates and guidelines.

In all cases it is recommended that developers seek independent statutory planning advice to guide the approach to their planning approvals.

What is the process with Sydney Water?

The flow charts provided on pages 3-5 are a summary of the engagement and assessment process with Sydney Water when seeking to deliver RSI. The flow charts show the alignment with external planning processes where these apply.

Further questions?

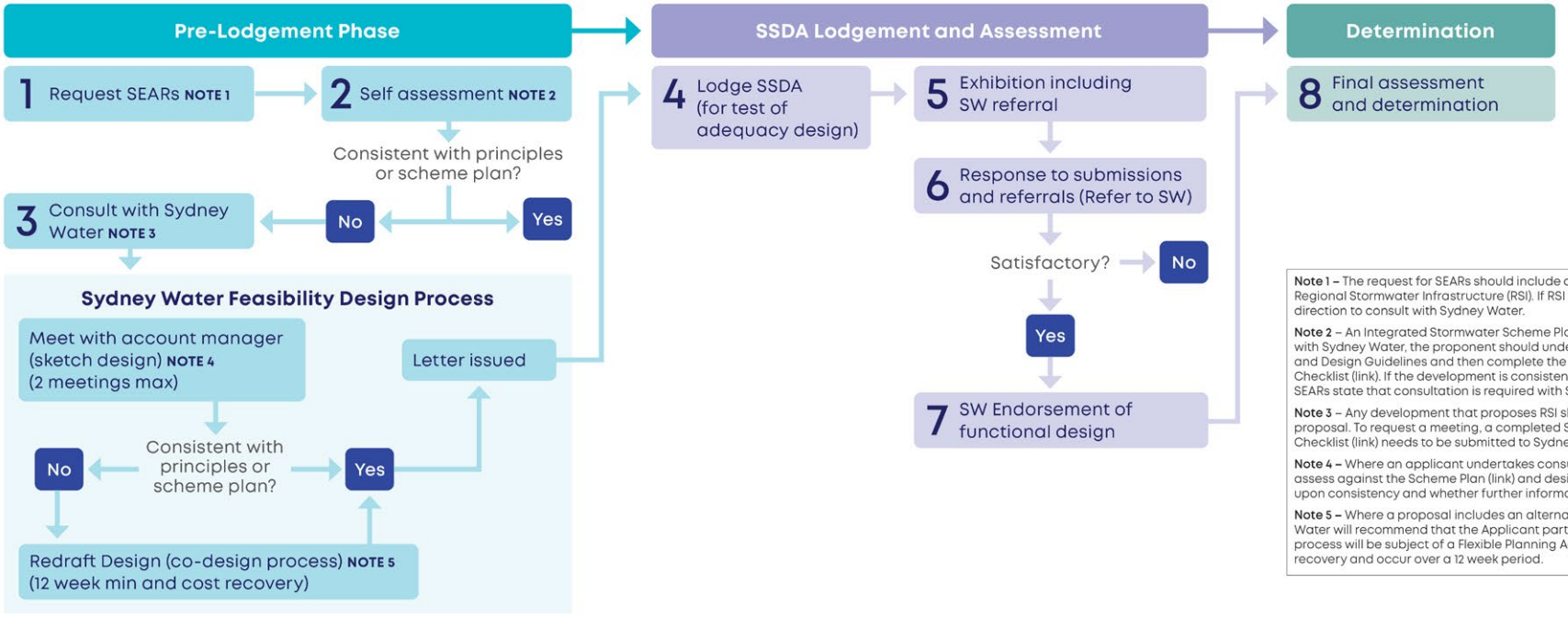
Further questions should be directed to aerostormwater@sydneywater.com.au or your Sydney Water Account Manager.

Additional information on the integrated regional stormwater network, including Sydney Water's Developer Works Policy which documents the reimbursement process for regional stormwater infrastructure, can be found at: https://www.sydneywater.com.au/content/dam/sydneywater/documents/stormwater-developer-works-funding-policy.pdf

Part 4 Sydney Water Regional Stormwater Infrastructure Approvals

Referral Process – State Significant Development Applications

SSDA	Request DGRs/SEARs	Lodge SSDA	Exhibit	Determination	
Sketch (5%)	**Strategic Design (10%)**	**Functional Design (50-75%)**			**Detailed Design (90%)**
Pre-feasibility	**Feasibility**	**SSDA Process**		**Section 73 Certificate**	**Procurement Package**
Pre-Feasibility • High level of awareness of proposal • Sketch plan provided to Sydney Water • 12D and GIS models of scheme assets available on web	**Feasibility** • WSC engaged • Strategic Plan/Design • Possible rejection or flexible planning agreement if not consistent with Stormwater Scheme	**SSDA Process** • Advice Letter to Consent Authority • Review processes commence • Survey and investigations • Functional Design		**S73 Application lodged** Functional Design Complete	**Design Package** • Detailed Design • Design Checklist • Design Certificate **Procurement Package detailed** • Cost estimate from Quantity Surveyor • Job spec letter • Inspection and Test plan



Note 1 – The request for SEARs should include a sketch plan and details of any proposed Regional Stormwater Infrastructure (RSI). If RSI is proposed, it is likely that the SEARs will include a direction to consult with Sydney Water.

Note 2 – An Integrated Stormwater Scheme Plan applies to the Aerotropolis. Before consulting with Sydney Water, the proponent should undertake an assessment against the Scheme Plan and Design Guidelines and then complete the Sydney Water SSDA Information Requirements Checklist (link). If the development is consistent with the principles or scheme plan and the SEARs state that consultation is required with Sydney Water, then Note 3 applies.

Note 3 – Any development that proposes RSI should meet with Sydney Water to discuss the proposal. To request a meeting, a completed Sydney Water SSDA Information Requirements Checklist (link) needs to be submitted to Sydney Water.

Note 4 – Where an applicant undertakes consultation with Sydney Water, Sydney Water will assess against the Scheme Plan (link) and design guidelines (link) and issue a letter commenting upon consistency and whether further information or a co-design process is required.

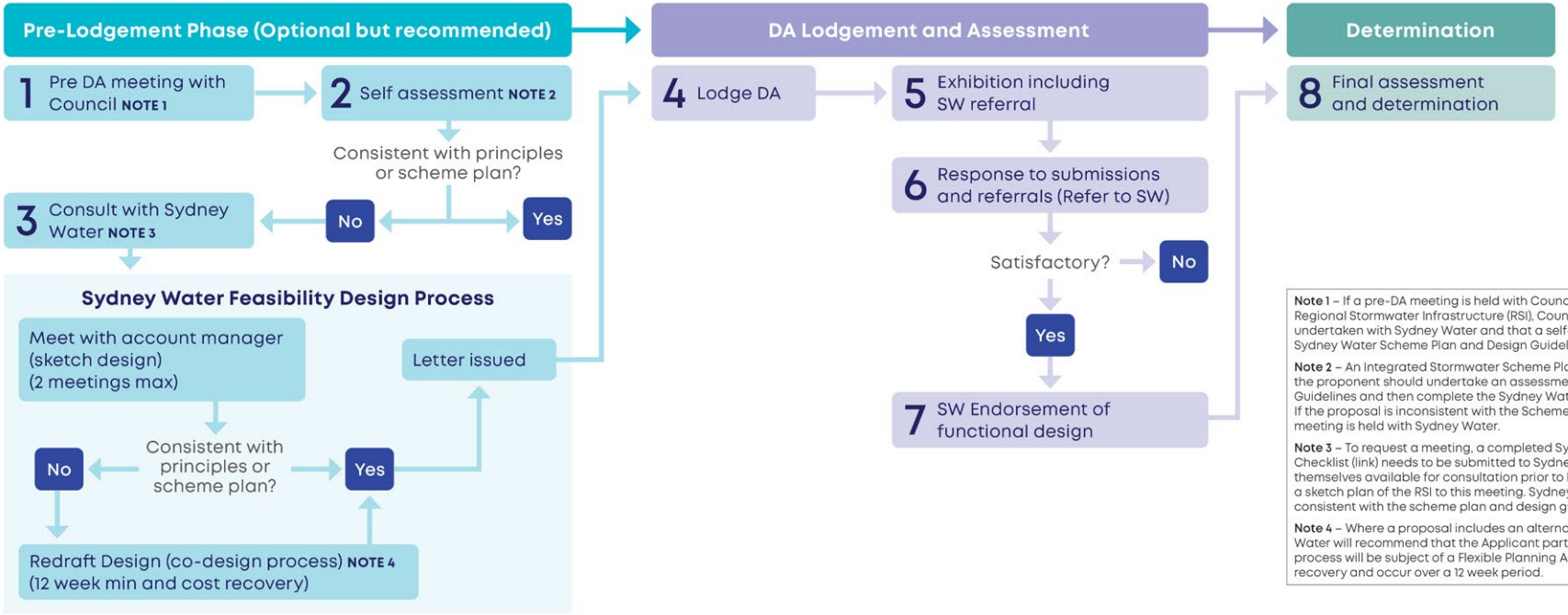
Note 5 – Where a proposal includes an alternate design to that in the Scheme Plan (link), Sydney Water will recommend that the Applicant participate in a Co-Design process. The Co-Design process will be subject of a Flexible Planning Agreement (need definition) to enable cost recovery and occur over a 12 week period.

This flow chart is available as an accessible text document from this link.

Part 4 Sydney Water Regional Stormwater Infrastructure Approvals

Referral Process – Development Applications

Local DA	Pre-lodged meeting	Lodge DA	Exhibit	Determination	
Sketch (5%)	**Strategic Design (10%)**	**Functional Design (50-75%)**			**Detailed Design (90%)**
Pre-feasibility	**Feasibility**	**DA Process**		**Section 73 Certificate**	**Procurement Package**
Pre-Feasibility • High level of awareness of proposal • Sketch plan provided to Sydney Water • 12D and GIS models of scheme assets available on web	**Feasibility** • WSC engaged • Strategic Plan/Design • Possible rejection or flexible planning agreement if not consistent with Stormwater Scheme	**DA Process** • Advice Letter to Consent Authority • Review processes commence • Survey and investigations • Functional Design		**S73 Application lodged** • Functional Design Complete	**Design Package** • Detailed Design • Design Checklist • Design Certificate **Procurement Package detailed** • Cost estimate from Quantity Surveyor • Job spec letter • Inspection and Test plan



Note 1 – If a pre-DA meeting is held with Council and the development proposal includes Regional Stormwater Infrastructure (RSI), Council will recommend that consultation is undertaken with Sydney Water and that a self-assessment of the development against the Sydney Water Scheme Plan and Design Guidelines is undertaken.

Note 2 – An Integrated Stormwater Scheme Plan applies to the Aerotropolis. If a RSI is proposed, the proponent should undertake an assessment against the Scheme Plan and Design Guidelines and then complete the Sydney Water DA Information Requirements Checklist (link). If the proposal is inconsistent with the Scheme Plan or principles, it is recommended that a meeting is held with Sydney Water.

Note 3 – To request a meeting, a completed Sydney Water DA Information Requirements Checklist (link) needs to be submitted to Sydney Water. Sydney Water representatives will make themselves available for consultation prior to lodgement of a DA. Applicants should bring a sketch plan of the RSI to this meeting. Sydney Water will determine whether the sketch is consistent with the scheme plan and design guidelines and if further consultation is required.

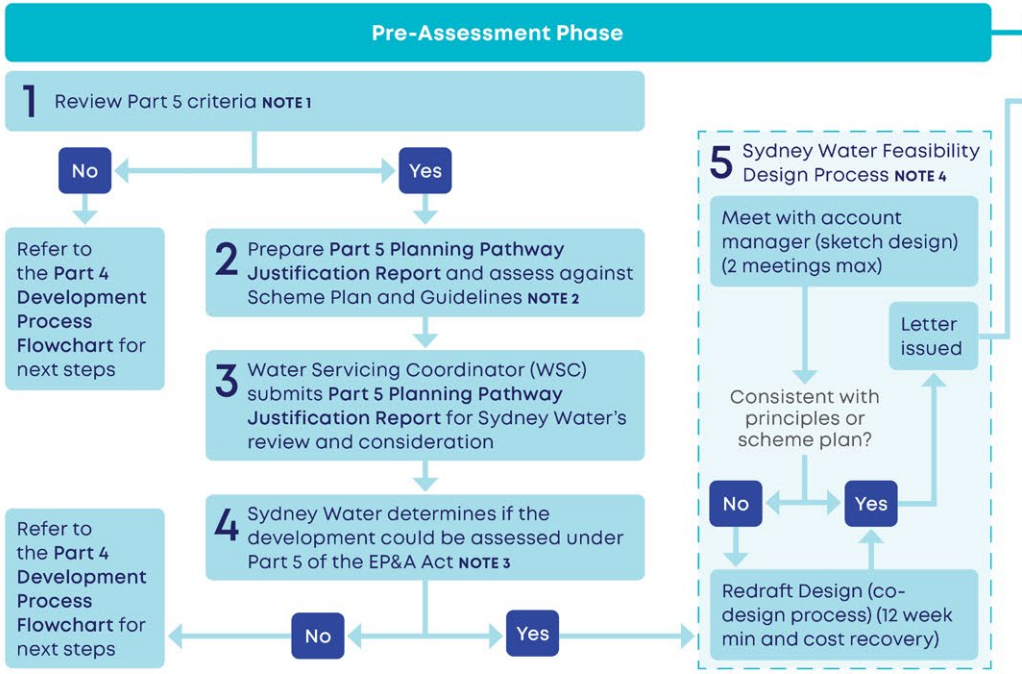
Note 4 – Where a proposal includes an alternate design to that in the Scheme Plan (link), Sydney Water will recommend that the Applicant participate in a Co-Design process. The Co-Design process will be subject of a Flexible Planning Agreement (need definition) to enable cost recovery and occur over a 12 week period.

This flow chart is available as an accessible text document from this link.

Part 5 Sydney Water Regional Stormwater Infrastructure Approvals

Planning Pathway Process

Planning Pathway Review	Pre-lodged meeting	Assessment	Determination	
Sketch (5%)	**Strategic Design (10%)**	**Functional Design (50-75%)**		**Detailed Design (90%)**
Pre-feasibility	**Feasibility**	**REF Process**		**Procurement Package**
Pre-Feasibility • High level of awareness of proposal • Sketch plan provided to Sydney Water • 12D and GIS models of scheme assets available on web	**Feasibility** • WSC engaged • Strategic Plan/Design • Possible rejection or flexible planning agreement if not consistent with Stormwater Scheme	**REF Process** • Survey and investigations • Functional Design		**Design Package** • Detailed Design • Design Checklist • Design Certificate **Procurement Package detailed** • Cost estimate from Quantity Surveyor • Job spec letter • Inspection and Test plan



Note 1 – Review Sydney Water's Part 5 Planning Pathway criteria to determine if a Part 5 assessment could be undertaken for the proposed Regional Stormwater Infrastructure (RSI) works. If the criteria is met, prepare Part 5 Justification Report.

Note 2 – Proponent prepares a sketch design and a brief report which outlines the proposed development; the reasons why the RSI should be assessed under Part 5 of the EP&A Act, considering Sydney Water's Part 5 Planning Pathway criteria; and the proposed infrastructure's consistency with Sydney Water's Scheme Plan and Design Guidelines. Notwithstanding that DCP guidelines do not apply to activities under Part 5 of the EP&A Act, all applications need to be accompanied with a completed Sydney Water DA Information Requirements Checklist (link).

Note 3 – As part of determining the planning pathway for the proposed works, Sydney Water may request further information and/ or a meeting with the WSC, planning consultant and proponent. Advice may also be given regarding the proposed RSI's consistency with the principles of the Scheme Plan and the need to go through Sydney Water's Feasibility Design Process.

Note 4 – Where an applicant undertakes consultation with Sydney Water, Sydney Water will assess against the Scheme Plan (link) and design guidelines (link) and issue a letter commenting upon consistency and whether further information or a co-design process is required.

Note 5 – Sydney Water meets with the WSC, planning consultant and proponent to discuss the REF requirements and scope of works. Sydney Water may request that their standard REF template is used. Should additional determining authorities be identified in this process or during the preparation of the REF, this will need to be discussed with Sydney Water.

Note 6 – Sydney Water may undertake multiple reviews and the REF before it is satisfied that the REF can be determined. Should the REF process identify that the proposed works triggers the need to prepare an Environmental Impact Statement (EIS), the proponent is to advise Sydney Water of this finding. Sydney Water is not able to determine an application that triggers the need for an EIS.

Note 7 – Sydney Water is a determining authority for the purposes of the EP&A Act. However, other public authorities may also be a determining authority for the proposed RSI. Under clause 171(4) of the EP&A Regulation, certain activities will require publication.

This flow chart is available as an accessible text document from this link.