

Transport

Transport for NSW submission on
the draft IPG Badgerys Creek Road
Master Plan

Re: Exhibition of the IPG Badgerys Creek Road Master Plan (WSA_MP01) 13 December 2024

Dear Ms Densmore,

Thank you for your referral to Transport for NSW (Transport), dated 15 November 2024 on the exhibition of the proposed IPG Badgerys Creek Road Master Plan.

On behalf of Transport for NSW, a submission is included in **Attachment A** to the Department of Planning, Housing & Infrastructure (DPHI). This advice relates to the proponent's responses to the conditions provided by the Technical Assurance Panel (TAP), as part of the Letter of Advice to DPHI provided on 3 May 2024.

Transport was a member of the TAP, which was set up by DPHI to oversee and advise on the preparation of the draft Master Plan and support the best outcomes for the site. The TAP process is an exemplar of multi-agency and cross government collaboration with the Proponent to develop the draft Master Plan. It has led to improved planning outcomes for the future development of the Western Sydney Aerotropolis.

The Letter of Advice advised that the Master Plan met the requirements of the TAP and is suitable for lodgement. However, the advice was subject to 48 conditions that should be met by the proponent on lodgement. Transport has reviewed the proponent's responses to the conditions and exhibited Master Plan.

Transport recognises the importance of the Western Sydney Aerotropolis to the future prosperity of Western Sydney and provides our feedback with the intent of being solutions focused and collaborative.

Sincerely,



Graham Richardson
Director Land Use, Network & Place Planning
Planning, Integration and Passenger

13/12/2024

Attachment A

The advice provided below followed a review of the proponent's response to the TAP conditions at the Test of Adequacy and exhibition stage.

TAP Condition 3

Prior to lodgement, all street cross sections within the draft master plan (Section 7.3.1-7.3.5) are to be updated to improve readability and to ensure consistency with the DCP in relation to quality and labelling.

Proponent's response

All typical street sections have been amended to improve readability and consistency with the Aerotropolis DCP. The sections have also been updated in the Public Domain and Landscape Strategy prepared by Site Image. Refer Section 7.3 of the Master Plan Report.

TfNSW advice

Appendix L DCP Compliance Table must address *Section 3.1 Local road network and design* of the DCP.

TAP Condition 18a

Include indicative pedestrian access connections/paths for workers to be able to access all adjoining roads on the Road Network Plan at Figure 38. The block sizes within the draft master plan are bigger than the Aerotropolis Precinct Plan and where allotments have frontages to more than one street, they must provide pedestrian access to all streets to ensure workers can use adjoining roads to directly access broader site facilities and amenities.

Proponent's response

The Road Network Plan in Section 7.3 of the Master Plan has been amended to include pedestrian connections and pathways for workers from the road to the ancillary office and communal areas within the lot. These connections into the lots are indicative only, as the future design of warehouses will be subject to further detailed design. In an industrial environment, access points are critical to the facility's functionality, security, and safety. However, having access points at differing boundary interfaces is generally discouraged for several reasons:

▪ Security Reasons

1. Surveillance: Centralised access points, typically near active frontages with ancillary offices, allow for better monitoring and control. These offices provide natural surveillance, enhancing the security of the premises. Multiple access points can dilute the effectiveness of security measures, making it harder to monitor all entries and exits.
2. Access Control: Managing fewer access points simplifies the implementation of security protocols such as identification checks, vehicle inspections, and gate operations. This reduces the risk of unauthorised access and improves overall security.

▪ Safety Concerns

3. Truck Movements: Industrial facilities often involve significant truck and machinery movement, particularly in loading and unloading areas. Concentrating access points helps manage and direct traffic flow, reducing the risk of accidents.
4. Pedestrian Safety: Minimizing access points limits the interaction between pedestrians and heavy vehicles. Designated paths and controlled crossings.

▪ Operational Efficiency

5. Traffic Flow Management: Centralized access points streamline the flow of vehicles, preventing congestion and bottlenecks at multiple entry points. This enhances the efficiency of goods movement and reduces delays.

6. Resource Allocation: With fewer access points, resources such as security personnel, barriers, and monitoring systems can be concentrated, optimizing their effectiveness and reducing operational costs. ■
Logistical Considerations

7. Loading and Unloading Coordination: A limited number of access points allows for better coordination of loading and unloading activities. This ensures that trucks are directed to appropriate bays without unnecessary waiting times or cross-traffic issues.

8. Emergency Response: In case of emergencies, having clearly defined and fewer access points can expedite emergency response and evacuation processes, improving overall safety.

TfNSW advice

Figure 38 shows potential future connections. However, the wording *'Lots with multiple road frontages must consider access for pedestrians to these roads to achieve greater permeability and shorter active transport trips. TfNSW must be consulted on this matter during site design phase and prior to issuing an Aerotropolis Certificate'* was not included as conditioned.

It is recommended that DPHI include a condition whereby TfNSW must be consulted during site design phases with regards to pedestrian site access points. The consultation must occur prior to any issuance of an Aerotropolis certificate. A record of consultation must be provided to the Planning Secretary (or their delegate) as part of any application for the certificate.

TAP Condition 22d

Amend the wording of Section 12.1 that requires TfNSW to respond within 21 days, to read as follows: "TfNSW will be issued the draft Travel Plan for review and comment, and endorsement will be provided by TfNSW in writing".

Proponent's response

TMAP Section 12.1 has been updated to reflect the following wording: "TfNSW will be issued the draft Travel Plan for review and comment, and endorsement will be provided by TfNSW in writing. TfNSW has a timeframe goal of 28 days to respond." This is a similar approach to other approvals under the EP&A Act.

TfNSW advice

The proposed timeframes for review, comment and endorsement are not agreed as the time frame for responses is not the subject of the Master planning process for reasons explained in the TAP.

It is recommended that DPHI include a condition whereby draft Travel Plans for individual sites must be issued to TfNSW for review and comment. Endorsement is required by TfNSW in writing prior to the issuance of an Aerotropolis certificate.

TAP Condition 36o

Include the following wording:

"In accordance with the Aerotropolis Precinct Plan, complying development applications must demonstrate that essential road infrastructure is available when required for the proposed development. To satisfy this requirement, it must be demonstrated that essential road and active transport links together with necessary network upgrades, will be in operation for the proposed development. The Transport Management and Accessibility Plan (TMAP) has established that sufficient network capacity is available to support a maximum gross floor area of 245,000m².

Further justification is required to support applications for additional development under the Master Plan as follows:

a. For complying development applications, a comprehensive addendum TMAP is to be prepared and include transport modelling as agreed with TfNSW in terms of modelling methodology. Endorsement of the updated TMAP by TfNSW is to be demonstrated prior to the application for an Aerotropolis Certificate. The updated TMAP must demonstrate that essential road infrastructure and network capacity is operational to support traffic generated by the proposed development."

Proponent's response

The control in the IPG Code (4.2.1 (5)) retains the gross floor area of 507,050sqm which has now been agreed with TfNSW.

TfNSW advice

The exhibited master plan documents have omitted "Appendix H – Complying Development Code", which was the subject of the abovementioned TAP condition and was provided at the Test of Adequacy prior to exhibition. Reference is made to this document in page 42 of Appendix N. Notwithstanding, the following advice is provided to DPHI:

It is recommended that DPHI include a condition of approval requiring the applicant to amend Section 4.2.1(5) of the IPG Complying Development Code to state:

"In accordance with the Precinct Plan, complying development applications must demonstrate that essential road infrastructure is available when required for the proposed development. To satisfy this requirement, it must be demonstrated that essential road and active transport links together with necessary network upgrades, will be in operation for the proposed development. The Transport Management and Accessibility Plan (TMAP) has established that sufficient network capacity is available to support a maximum gross floor area of 507,000m². In addition:

- The TMAP and associated modelling is to be updated within 5 years from the date of approval of the Master Plan, or when the gross floor area of the whole master plan site exceeds 407,920m² (whichever occurs first), to establish that the underlying transport assumptions supporting the gross floor area are still accurate. This updated TMAP and modelling is to be provided to TfNSW for review and endorsement prior to any development and/or complying development approval that would result in a gross floor area greater than 407,920m².
- TfNSW will continue to monitor the safety and efficiency of the Transport Network in our review of development applications and any relevant comments or required additional modelling may be identified by TfNSW as part of a development application process.

Further justification is required to support subsequent applications under the Master Plan, as follows:

a) For complying development applications, an addendum to the TMAP is required, which includes transport modelling as agreed with TfNSW in terms of model methodology. Endorsement of the updated TMAP by TfNSW is to be demonstrated prior to the application for an Aerotropolis Certificate. The updated TMAP is to demonstrate that essential road infrastructure and network capacity is operational to support traffic generated by the proposed development."

TAP Condition 41

Prior to lodgement, the draft master plan is to be updated to include an additional control in Section 12, that reads as follows: "For each complying development application, a travel plan must be prepared by the proponent and endorsed by TfNSW in writing, prior to the issue of an Aerotropolis Certificate."

Proponent's response

Section 12.3 has been updated to incorporate the wording suggested in this condition.

An additional statement has been added in relation to timing, which includes:

"TfNSW will be issued the draft Travel Plan for review and comment, and endorsement will be provided by TfNSW in writing. TfNSW has a timeframe goal of 28 days to respond."

This is a similar approach to other approvals under the EP&A Act.

Given the Master Plan is supported by the Complying Development Code and Framework (Appendix H) which purpose is to enable an efficient and streamlined approval process, hence having a step in the process that is be open ended and is not supported by a specified timeframe would defeat the purpose of the CDC.

TfNSW advice

The exhibited master plan documents have omitted “Appendix H – Complying Development Code”, which was the subject of the abovementioned TAP condition and was provided at the Test of Adequacy prior to exhibition. Reference is made to this document in page 48 of Appendix N. Notwithstanding, the following advice is provided to DPHI:

The proposed timeframes for review, comment and endorsement are not agreed as the time frame for responses is not the subject of the Master planning process for reasons explained in the TAP.

It is recommended that DPHI include a condition of approval requiring the applicant to amend Section 4.2.1(6) of the IPG Complying Development Code to remove the timeframe goal of 28 days for TfNSW to respond. The proposed change is shown below.

4.2.1(6) “For a complying development application for new buildings and additions, a Travel Plan must be prepared by the proponent and endorsed by TfNSW in writing, prior to the issue of an Aerotropolis Certificate. ~~TfNSW has a timeframe goal of 28 days to respond.~~”

TAP Condition 46d

State that the proponent is responsible for constructing the new roundabout on BCR [Badgerys Creek Road] and Road 03. The civil plans are to also show this roundabout, with a label that it is indicative and with a note that states 'subject to further detailed design and acceptance by the road authority'.

Proponent's response

IPG acknowledges that it is willing to deliver the construction of the roundabout on Badgerys Creek Road and Road 3. Due to the fact that both roads are nominated as Collector Roads in the Section 7.12 Plan, IPG would be seeking reimbursement for these works.

A Development Application will be lodged with LCC in future for the delivery of the new roundabout. Civil Plans and other related studies have been prepared and a pre-Development Application meeting with Liverpool City Council will occur in June 2024. This has been included in the IDC.

A label has been included in the civil plans for the roundabout to indicate that it is subject to further detailed design and acceptance by the road authority.

TfNSW advice

The staging and provision of the roundabout provided in the Master Plan and Infrastructure Delivery Strategy should take precedence over advice in other technical studies including the civil plans.

The label should be consistent across all reports.

Additional comments

Section 7.3.1 of the Badgerys Creek Draft Master Plan Report

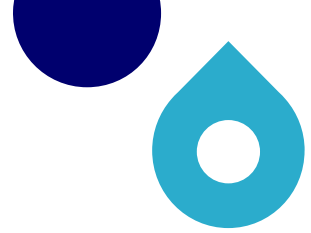
Comment: Typical street cross-sections for Eastern Ring Road and other main roads are indicative only and subject to separate detailed design and approval.

Recommendation: A note to this effect should be included in the Master Plan Report for these cross-sections. This is consistent with comments on local roads in the report.

Appendix J: Amended SEPP and Precinct Plan – Transport Corridors Map

Comment: The changes to Fifteenth Avenue and Badgerys Creek Road south of the Eastern Ring Road in the mapping under the Precinct Plan are subject to detailed design.

Recommendation: The map should include notation that these connections are subject to detailed design.



16 December 2024

Our reference: 220074, 216741, 214103

James Gibbeson

Department of Planning, Housing and Infrastructure

james.gibbeson@planning.nsw.gov.au

Sydney Water comments on WSA_MP01 IPG Badgerys Creek Rd Master Plan at 475 Badgerys Creek, Bradfield (Proposed by Ingham Property Group)

Thank you for notifying Sydney Water of WSA_MP01 IPG Badgerys Creek Rd Master Plan at 475 Badgerys Creek, Bradfield.

Being a key business hotspot for the Western Sydney International Airport, the Master Plan proposes an enterprise estate with warehouse and distribution centres, light industry and a small-scale local centre including commercial uses, as well as open space. There will be **no residential development proposed within the Master Plan site.**

The draft Master Plan will enable the delivery of:

- **more than 12,400 jobs (12,429 jobs)**
- **over 625,000 sqm of mixed-use gross floor area (506,530sqm - enterprise and light industry; 118,417sqm business and commercial; 520sqm retail amenity node)**
- a 184-hectare development hub of industry and innovation, attracting local and global companies to the Western Parkland City and the airport that serves it
- more than 45 hectares of open space and landscape areas
- mixed-use development, road networks and open areas comprising 25 lots for enterprise, commercial and retail use.

The draft Master Plan package has provided documents that proposes changes to key planning controls to facilitate the master plan, which includes amendments to the Western Parklands City SEPP, the Western Sydney Aerotropolis Precinct Plan and variations to the Western Sydney Aerotropolis Development Control Plan.

We have reviewed the documents supplied and noted below and provided the following comments below to assist in understanding the servicing needs of the proposed development. Further information on the stormwater specifics can also be found in Appendix 1.

- *Master Plan Report*
- *Appendix A – Master Plan Requirements Complain*
- *Appendix U – Asbestos Management Plan*

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Water Servicing

- The proposed development is currently located within the Cecil Park Water Supply Zone (WSZ). This WSZ does not have trunk main connectivity to support growth in this region and is proposed to be initially rezoned to the Oran Park WSZ in 2025.
- The existing local mains along the Master Plan site do not have sufficient capacity to service future developments.
- Future extensions, amplification, adjustment and/or deviation works will be required. Investigation of extension works are progressing under CN216741. This will be re-assessed in more detail in future applications proposed by the proponent.

Wastewater Servicing

- This development falls within the Badgerys Creek Wastewater trunk main and the Thompsons Creek carrier to the east of the site. Both trunk mains are anticipated to be delivered by Sydney Water in 2026/27.
- An Interim Operating Procedure (IOP) feasibility is in progress under CN214103 to provide interim servicing to the site until Sydney Water infrastructure has been completed and commissioned.

Recycled Water Servicing

- Recycled water for non-drinking water uses will be provided in the Initial Precincts. It will be sourced from Upper South Creek Advanced Water Recycling Centre (AWRC), as recommended by our Sub-Regional Planning Study. The Integrated Water Servicing Options analysis is currently in progress to determine the preferred servicing option.
- Sydney Water will confirm the requirements for recycled water mains and connections on finalisation of the preferred option and scheme plan for the Initial Precincts. The requirements will include that each lot must have a frontage to a recycled water main that is the right size and can be used for connection of the lot to the recycled water main.
- In addition to the above, the Initial Precincts recycled water reticulation network will initially be supplied by the adjacent potable water reticulation network. This arrangement will remain until the supply of treated stormwater and/or recycled wastewater from AWRC is established. Once the stormwater and recycled water supply is established, the connections between the potable water and recycled water networks will need to be **decommissioned**. The proponent must clearly show the locations of any cross connections between the potable water network and recycled water network on the design plans which need to be reviewed by Sydney Water. The proponent must also provide the finished surface levels to Sydney Water.

Stormwater Servicing

- **Sydney Water cannot endorse this application at this stage until the request for further information is provided and amendments to the proponent's supporting documents have been undertaken. Continued detailed consultation and early engagement between Sydney Water and IPG is required in coordinating suitable stormwater infrastructure assets and management to accommodate future developments within the Master Plan site.**
- Appendix 1 provides further details on what actions are required to meet these requirements.

Infrastructure Contributions

For information, please also note the following:

- Proponents will be required to pay infrastructure contributions towards Sydney Water's stormwater and recycled water servicing. Sydney Water is preparing a Development Servicing Plan (DSP) for the recycled water and trunk drainage in the Aerotropolis Initial Precincts. This DSP will determine the amount of the stormwater and recycled water Infrastructure Contributions to be paid to Sydney Water for the development.
- Proponents should also be aware that infrastructure contributions for drinking water and wastewater will also be payable for all developments that require a Section 73 Compliance Certificated from 1 July 2024 onwards.
- More information on reintroduction of drinking water and wastewater contributions can be found at [Infrastructure contributions | Sydney Water Talk](#) and the Sydney Water Development Application Information Sheet (for proponent) enclosed.

Next Steps

- IPG is strongly advised to continue early engagement with Sydney Water, noting their proposed committed works/plans. The stormwater comments and clarifications requested in Appendix 1 must be addressed as soon as possible. For stormwater discussions and concerns IPG should contact westernsydney@sydneywater.com.au.

This development servicing advice provided is not formal approval of our servicing requirements and is based on the best available information at the time of referral. Detailed requirements for water, wastewater, recycled water, and stormwater, including any potential extensions or amplifications, will be provided once developments are referred to Sydney Water for a Section 73 application. The provision of stormwater service to future development and the granting of a Section 73 Certificate will also be conditional upon the delivery of the infrastructure by Sydney Water and other developers.

It is important to note that this information can evolve over time in tandem with the progression of other development projects in the catchment, changes within the local systems and receiving works. This is particularly important in systems with limited capacity. Furthermore, Sydney Water does not reserve or hold capacity for proposed developments,

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regardless of whether the area has been rezoned or not. To ensure accuracy and alignment with current conditions, it is best to approach Sydney Water for an updated capacity assessment particularly if a referral response letter is more than 12 months old.

Sydney Water looks forward to continuing engagement with IPG and the Department in the delivery of the Badgerys Creek Master Plan. If the proponent has any questions, they should contact their Sydney Water Account Manager Ebony Evans at ebony.evans@sydneywater.com.au. Should the Department require any further information, please contact the Growth Planning Team via urbangrowth@sydneywater.com.au.

Yours sincerely,



Kristine Leitch

Manager, Growth Planning
Growth and Development
Water and Environment Services
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Enclosed:

- [Appendix 1 – Detailed Sydney Water Stormwater comments](#)

Appendix 1 – Detailed stormwater servicing comments

Document	Subject	Comment type	Comment
General Comment	Stormwater	Recommendation and amendment request	<p>The Masterplan must be amended to align with the following principles before Sydney Water is able to provide endorsement:</p> <p>1) Sydney Water will only acquire the land for regional stormwater basins, including bioretention, wetlands, storage ponds and any associated land required for batters and maintenance of these basins.</p> <p>2) Sydney Water will not acquire additional surrounding lands that are not required for stormwater management.</p> <p>3) Sydney Water will not acquire land for Riparian Streets, naturalised trunk drainage channels, streams or creeks that have a trunk drainage function or existing water bodies as per 2.3.3 PO1 & PO2 of the Development Control Plan.</p> <p>Rather, access is to be provided to Sydney Water through gifted easements for the ongoing operations and maintenance of the system. The maximum area of land to be designated for access is the vegetated riparian zone or the 1% AEP flood extent, whichever is greater, for all waterways. All costs associated with the value of land and easement creation are to be borne by the developer.</p>
General Comment	Stormwater	Recommendation	Sydney Water has continued to refine its approach and standard designs in order to minimise infrastructure footprint and scheme costs. Collaboration between IPG and Sydney Water should continue to ensure these design refinements are built into the stormwater infrastructure proposed for the masterplan site.
General Comment	Stormwater	Recommendation	IPG will need to work with Sydney Water to develop a stormwater staging plan to determine when and how regional stormwater assets will be delivered. This can then advise if each development within the masterplan area will require on lot interim stormwater servicing or can simply connect to the regional stormwater scheme.

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General Comment	Stormwater	Amendment request	Amend the Civil Infrastructure report Appendix C Sydney Water letter to include more recent Feasibility advice (dated August 30 2024) that includes stormwater and recycled water advice/requirements.
Master Plan Report	Stormwater	Amendment request	The proposed land acquisition layer is currently not acceptable to Sydney Water. Consultation is required between IPG and Sydney Water to ensure the Masterplan reflects suitable and agreed stormwater infrastructure (e.g. basin sizes, configurations and locations.) The stormwater basin layouts need to be finalised/agreed with Sydney Water before we can support the Masterplan. Main issues are around the Endeavour Energy substation and easement as well as the planned realignment of Badgerys Creek Road (basins M01, M02 and M03) as well as M12A, M12B and M13. These issues have been previously raised and are yet to be resolved.
Master Plan Report	Stormwater	Amendment request	The land reservation mapping (and proposed changes to the Aerotropolis SEPP mapping) must be updated to reflect the regional stormwater infrastructure footprints that will need to be refined and agreed between Sydney Water and IPG.
Appendix A - Master Plan Requirements Compliance Table	Complying Development	Recommendation	Sydney Water will need to endorse the Complying Development Code/Guidelines before it can be implemented for stormwater. Each development will need to be able to demonstrate compliance with the waterway health targets either by connection to the regional stormwater scheme (when available) or through interim on lot measures. Sydney Water will need to advise each development if and how they are able to connect to the regional scheme.
Appendix U - Asbestos Management Plan	Stormwater Infrastructure	Recommendation	The report identifies several sites where remediation and validation for asbestos has been undertaken (see Figure 1). A number of these sites correspond to sites where stormwater infrastructure will be constructed. Generally, this infrastructure will be constructed as part of the development within the Master Plan. As such, any future discoveries of asbestos contamination are to be covered by the current land holder and will not be covered by Sydney Water. Compensation will not be paid for the delivery of infrastructure impacted by potential future contamination discoveries.

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Figure 1: Site layout indicating locations of Farms 1-7 where asbestos remediation has been undertaken



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Mr Andrew Watson
DA Coordinator
Department of Planning, Housing and Infrastructure

By email: andrew.watson@planning.nsw.gov.au

10 January 2025

**EPA Response – Exhibition – Master Plan
475 Badgerys Creek Road, Bradfield**

Dear Mr Watson

Thank you for providing the NSW Environment Protection Authority (EPA) with the opportunity to comment on the proposed Ingham Property Group (IPG) Badgerys Creek Road Master Plan located at 475 Badgerys Creek Road, Bradfield NSW 2556 (Ingham Site).

The EPA reviewed:

- *Ingham Property Group Planning Report – IPG Badgerys Creek Road, Master Plan 01*, September 2024, Urbis Pty Ltd (Planning Report)
- *IPG Draft Badgerys Creek Road Master Plan - 475 Badgerys Creek Road*, 23 September 2024, Urbis Pty Ltd (Master Plan)
- *Discussion Paper – IPG Badgerys Creek Road Master Plan – Amendments to Western Sydney Aerotropolis Precinct Plan and Development Control Plan*, September 2024, Urbis Pty Ltd
- *Noise Planning Assessment - 475 Badgerys Creek Road, Bradfield NSW*, June 2024, EMM Consulting Pty Ltd
- *475 Badgerys Creek Road - Masterplan Air Quality Assessment*, 18 June 2024, SLR Consulting Australia Pty Ltd
- *Badgerys Creek Environmental Report - 475 Badgerys Creek Road, Badgerys Creek NSW*, 17 June 2024, Senversa Pty Ltd
- *Asbestos Management Plan – 475 Badgerys Creek Road, Badgerys Creek NSW*, 9 November 2023, Senversa Pty Ltd
- *Waste Management Plan – 475 Badgerys Creek Road, Bradfield*, June 2024, SLR Consulting Australia Pty Ltd (Waste Management Plan)
- *Framework Construction Environmental Management Plan, Badgerys Creek Road, Bradfield*, 6 June 2024, SLR Consulting Australia Pty Ltd (CEMP)

Based on our review of these reports, we provide the following:

Contaminated land

The Environment Report about contamination provided with the Master Plan states the Ingham Site is suitable for the proposed commercial/industrial use and recommended that an asbestos management plan with an unexpected finds protocol be prepared to address any remaining residual asbestos. An asbestos management plan with an unexpected finds protocol was included

with the planning proposal and it provides a procedure to manage asbestos if encountered during development works at the Ingham Site.

However, from our review of the Planning Report, Master Plan, Waste Management Plan and CEMP, the status of contamination at the Ingham Site was referred to as “free of contamination”, “not impacted by contamination” and “no problems should be encountered in excavating the near surface material on site” (refer to section 13.2 of the Planning Report). Section 18.2.8 of the Master Plan describes actions upon the discovery of contamination, however, does not reference the protocol for managing unexpected finds of asbestos.

To improve clarity about the status of contamination at the Ingham Site and ensure asbestos is considered and managed appropriately if encountered during development works, the EPA recommends:

- the asbestos management plan with the unexpected finds protocol be enforced by a statutory instrument such as the Master Plan or Development Control Plan.
- the status of contamination should be referred to within planning proposal documents for the Ingham Site as assessed, remediated, and validated and found to be suitable for the proposed commercial/industrial use. An asbestos management plan that includes an unexpected finds protocol has been prepared to address any remaining residual asbestos encountered at the site.
- planning proposal documents for the Ingham Site that discuss earth or excavation work should mention the possibility of encountering asbestos and refer to the asbestos management plan for its management.

Air

From our review of the air quality assessment, we note the extractive and waste recovery facility managed by Elford Group Pty Ltd directly west of the Ingham Site and licensed by the EPA (EPL 20498) was not included in the air quality assessment as a potential source of air emissions. This facility recovers waste generated from major infrastructure projects such as Western Sydney Airport and the Sydney Metro and has the potential to generate dust.

In our email response dated 30 June 2023 to Tranche 1 Technical Studies, EPA recommended the following about dust impacts (please refer to Enclosure 1):

- undertaking real time dust monitoring at the Ingham Site, as this will assist with regulating dust generating facilities and earthwork projects that will be occurring concurrently within the Badgerys Creek area.
- IPG engage with PGH Bricks & Pavers Pty Limited about reusing water from their large-scale pit. PGH is a facility regulated by the EPA (EPL 684) and is located directly north of the Ingham Site.

We note, dust impacts have been addressed at Appendix E of the Master Plan by requiring developments within the Ingham Site to prepare a site-specific CEMP. These CEMPs must consider implementing appropriate air quality control measures and monitoring.

Noise

We have reviewed the most recent noise assessment and can confirm it is representative of discussions held between the EPA, Department of Planning, Housing and Infrastructure and IPG about noise. We recommend any future noise assessments for individual developments within the Ingham Site must reference the noise limits within this noise assessment and prove compliance at the nearest receivers within the noise catchment (receiver) areas.

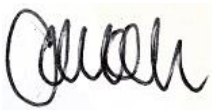
Waste

The Waste Management Plan provided with the planning proposal refers to clean fill and suggests it can be re-used at the Ingham Site without ensuring it is fit-for-purpose and will not impact human health and the environment.

Considering the potential to encounter asbestos at the Ingham Site, we recommend any material generated from the Ingham Site and re-used on-site meets the requirements of an [existing or specific resource recovery order and exemption](#) before it is land applied.

If you have any further questions about this submission, please contact Kim Stuart in the Strategic Planning Unit at environmentprotection.planning@epa.nsw.gov.au.

Kind regards

A handwritten signature in black ink, appearing to read 'Chris Marsh', is placed on a small, light-colored rectangular background.

Chris Marsh
A/Unit Head – Environment Protection Planning
NSW Environment Protection Authority

Enclosure: EPA comments Tranche 1 Technical Studies – 30 June 2023



6 January 2025

Andrew Watson
DA Coordinator
Key Sites and Regional Assessments
Department of Planning, Housing and Infrastructure

By Email: Andrew.Watson@planning.nsw.gov.au

Dear Andrew,

**Inghams Property Group Master Plan WSA_MP01
475 Badgerys Creek Road, Bradfield**

Thank you for the opportunity to provide comments in response to the public exhibition of the Inghams Property Group Master Plan (WSA_MP01) at 475 Badgerys Creek Road, Bradfield (the site).

It is noted and appreciated that both the Department of Planning, Housing and Infrastructure (DPHI) and the proponent and their aviation consultants have separately consulted with WSA in relation to the preparation of this Master Plan given the proximity of the site to the airport and the future parallel runway. There are multiple airport safeguarding provisions that apply to this site and continued engagement on any activity on this site is essential.

Our feedback is provided in the interest of safeguarding the future safety and operation of WSI for both runways.

Thank you again for the opportunity to provide comments on this application. If you would like to discuss any of the feedback or require further clarification, please contact me on nwilliams@wsaco.com.au

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Natasha Williams'.

Natasha Williams
Planning Manager

WSI Assessment and Comments of Inghams Property Group Master Plan

WSA_MP01

475 Badgerys Creek Road, Bradfield

1. The Master Plan

The Master Plan is to guide development on the subject site and provide site specific objectives and development outcomes that aligns with the Western Sydney Aerotropolis Plan (WSAP). The Master Plan proposes amendments to the WSAP, the SEPP (Precincts -Western Parkland City) and Aerotropolis DCP.

The Master Plan consists of:

- 25 Lots including 23 Enterprise Lots and 2 Commercial Lots supporting warehouse and distribution, logistics, light industry and business and commercial uses
- 456,000sqm of open space and landscaped areas across three riparian corridors and the local park within the local centre
- Built form accommodating maximum GFA of 625,467sqm
- Maximum height provisions 24m to 52.5m that support high-bay warehousing
- Design Quality Strategy and Design Verification Checklist
- Specific Complying Development Controls with the final position in determining the future development across the site is the planning minister in the form of an Aerotropolis Certificate. Where the Complying Development parameters are not met then a usual DA or SSDA would be required.

The Aerotropolis Precinct Plan is proposed be refined as follows:

- Increased floor space to support employment growth
- Creek continuity and connectivity
- Realignment of the Eastern Ring Road and the Bradfield Metro Link Road
- Small Scale Local Centre
- Flexibility of the Building Height Controls to accommodate High-Bay Warehousing

Development outcomes are shown in **Figure 1** and **Figure 2** shows the lot layout.



**Western
Sydney
Airport**

OFFICIAL



Figure 1 – The Master Plan

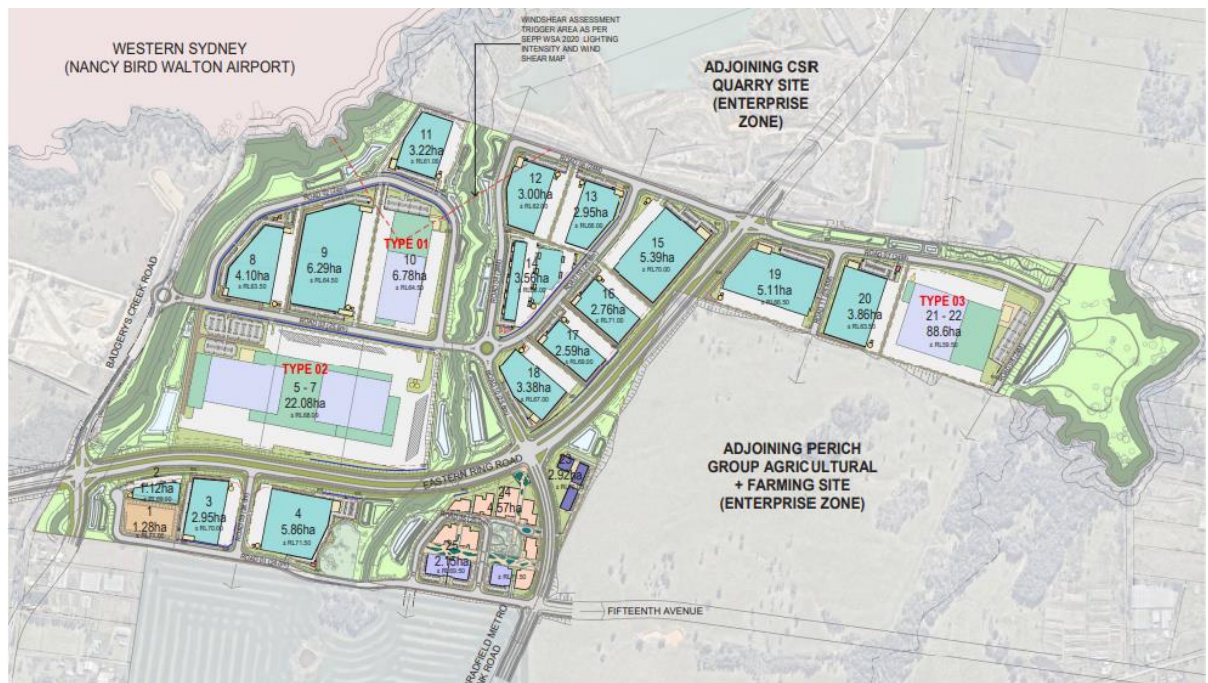


Figure 2 – Lot Layout

Comment:

The Master Plan sets out the principles in Master Plan Report (page 37 and page 94). Part of the determination and outcomes of the Master Plan is based on supporting the success of the airport and in this regard an additional principle should include airport safeguarding.

2. Building Heights

One of the key departures from the Precinct Plan is the height controls. The proposal seeks to increase the height in two locations across the site to enable flexibility to deliver high bay warehousing.

Current height limits under the Precinct Plan are 24m across the site except for the southeastern corner which is a 52.5m height limit. The proposal is to enable the height to increase from 24m to 52.5m in two other key locations as shown in **Figure 3** and identified as Western and Eastern Precinct. The additional height is sought on the basis that it will accommodate high bay warehousing and emerging industries.

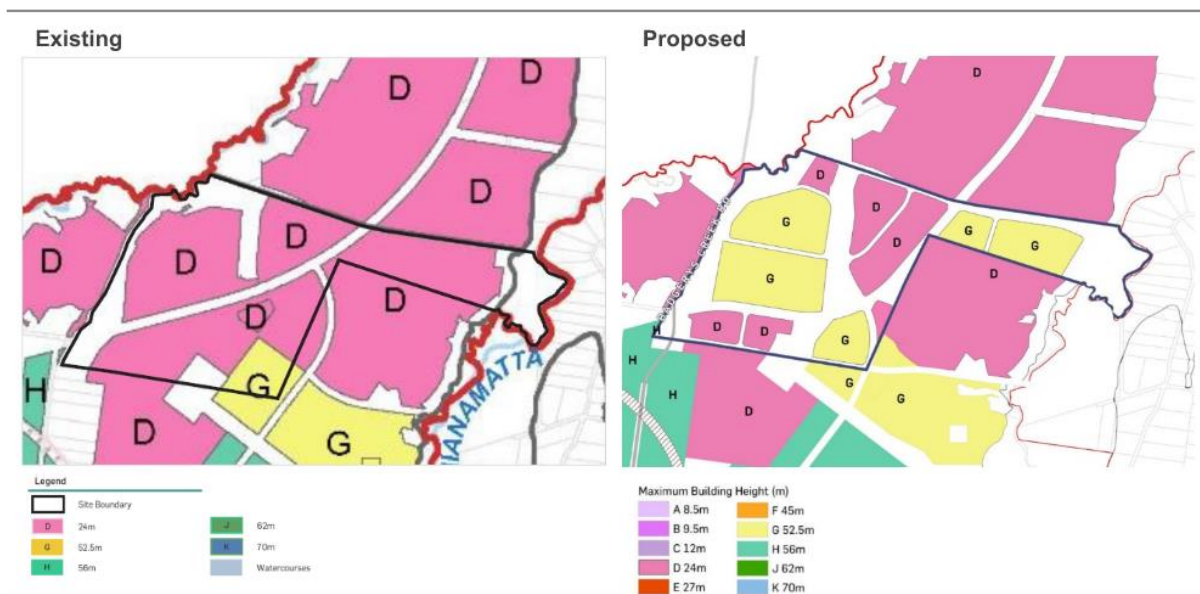


Figure 3 – Current Precinct Plan Heights vs Proposed Master Plan Heights

Comments:

The Aeronautical Impact Assessment provides the following analysis of building heights

Lot Numbers	Building Height as per Figure 1	Highest Ground Level in Lots (AHD)	Highest Building Point (m) AHD	Highest Building Point incl. Plant (m) AHD
1 – 4 inclusive	24m (pink shading)	72.5m	96.5m	97.5m
5 – 10 inclusive	52.5m (yellow hatched shading)	70.5m	123.0	124.0m
11	24m (pink shading)	61.0m	85.0m	86.0m
12 – 18 inclusive, and 23	24m (pink shading)	71.5m	95.5m	96.5m
19 – 22 inclusive	52.5m (yellow hatched shading)	68.0m	120.5m	121.5m
24 – 25 inclusive	52.5m (yellow shading)	71.0m	123.5m	124.5m

Table 1: Height Inputs & Assumptions

Based on the above analysis by the proponent, the proposed building height will not penetrate the Obstacle Limitation Surface (OLS) which is 126m (AHD). However, the assumption that building plant will be no more than 1m higher than the building (presumably roof) is likely underestimating the height of roof top building plant.

To construct 52m high bay warehouses it is assumed that cranes would be required to be used. Given the proposed heights, tower cranes would penetrate the OLS. Development that impacts protected airspace requires a controlled activity approved under the Airports (Protection of Airspace) Regulation 1996. A Controlled Activity application must be submitted to WSI for assessment and consultation with relevant Commonwealth Agencies. WSI as the Airport Lessee Company (ALC) will assess the application and refer it the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for determination.

Protected airspace also includes the PANS-OPS as well as other surfaces. It should be noted that the PANS-OPS surface is currently being prepared. Long term intrusion into the PANS-OPS (i.e. greater than 3 months) are prohibited.

Additionally, it should be noted that under SEPP (Precincts-Western Parkland City) 2021 Clause 4.22, development consent must not be granted to development unless the relevant Commonwealth body (e.g. WSI) supports it.

3. Complying Development

The intention of the Master Plan is to enable amendments to the Precinct Plan and statutory instruments and guiding documents that implement the Precinct Plan such as the SEPP and the Aerotropolis DCP.

It is also seeking an exempt and complying development pathway to facilitate certain development within the site. The range of land uses proposed as complying development and include:

- First use of a premises
- New buildings and additions



- Awnings and canopies
- Subdivision and bulk earthworks
- Retaining walls
- Public domain and landscaping
- Public art
- Local roads and road infrastructure
- Lighting
- Stormwater works
- Other Subdivision Code
- Tree removal

From an airport safeguarding perspective, the relevant uses are for the construction of new buildings and additions, public domain and landscaping and lighting.

Accompanying the Master Plan is the Complying Development Code (CDC) that sets out the proposed requirements for Complying Development. WSI notes that if the proposal does not fall within these requirements, then a development application or State Significant Development Application will be required to be submitted.

Development that would ordinarily require authority referrals under environmental planning instruments must obtain the relevant referral prior to lodging an application for an Aerotropolis Certificate.

The Complying Development Justification report indicates that where the SEPP (Precincts – Western Parkland City) requires “evidence” from the relevant ‘Commonwealth Body’ (in this case WSI), this “evidence” is to be provided ahead of an Aerotropolis Certificate being issued for that development. The “evidence” from the Commonwealth Body that would need to be provided in relation to safeguarding includes:

- Controlled activities – no objection
- Windshear trigger assessment area - has agreed to the development
- Lighting – has been consulted

Comments:

- Section 2.2. of the draft CDC details the general requirements for Complying Development. Clause 6 of the CDC code should be clearer in relation to the airport safeguarding matters that should be required, specifically Clause 6(c) of the draft CDC should be amended to read:
 “an application for an Aerotropolis Certificate under Part 4.7 Division 3 of State Environmental Planning Policy (Precincts—Western Parkland City) 2021 is to be accompanied by a written response from the relevant Commonwealth body ***stating that it does not object to the proposed development.***”
- The complying development code requires evidence from the Commonwealth Body in certain circumstances ahead of an Aerotropolis Certificate being issued. What is the



form of evidence required and what documentation is to be used to clearly satisfy this requirement?

- Under the SEPP Clause 4.22 Airspace Operations, the Commonwealth Body needs to advise if it objects to the development or not if development intrudes into prescribed airspace, including construction methodology (i.e. cranes). Although the building heights proposed are below the OLS, there is potential for the intrusion into the OLS with crane usage during construction. The type of crane usage and duration is unknown and the impacts will require assessment from multiple Commonwealth agencies and therefore reference to this needs to be made in the Complying Development Code and this type of development considered a DA/SSDA rather than a CDC.
- In relation to proposed condition 4.6. Temporary Construction Cranes of the Complying Development Code, crane operations can impact on airport operations. As crane impacts are unknown at this time and crane intrusions into protected airspace require consultation with multiple agencies and impact assessment, sub clause (ii) should be removed which would be consistent with the above comment.

4. Airport Safeguarding

Given the location of the site in proximity to the airport and sharing a boundary with the airport site to the north, there are some key aviation safeguarding matters to consider. The closest site boundary to the 23L end of second runway is approximately 900m and to the 23R end of the single runway is approximately 2.8km.

Future planning around the southern portion of the airport where the second runway is proposed needs to continue to be safeguarded to ensure that future operations of the airport and protection of the airspace is carried out.

Aircraft Noise

The majority of the site is subject to the 20-25 ANEC Contours, with the northwestern part of the site subject to the 25-30 ANEC contour.

Under AS2021:2015 for acceptable noise standards for development, the development of warehousing/light industrial is acceptable in the 30-40 ANEF with conditions.

Windshear and Turbulence

A small area of the site in the north west corner is within the windshear assessment trigger area. This area is identified for the second runway and although not constructed, the control is in place and operational to ensure future safeguarding of the airport. The impacted lots under the Master Plan are proposed lots 9,10 and 11.

Under the complying development provisions, it states on pg18 of the Exempt and Complying Framework Justification Report:

To be complying development for the purposes of this Policy, any proposed building or structure within the windshear assessment area as identified on the Wind Shear Restrictions Map must not breach the 1:35 surface specified in Section 4.18 of the WPC SEPP, unless a letter of support is provided with the complying development application that the relevant Commonwealth Aviation Body has agreed to the development, as indicated in 3.7.1 above.



Comments:

- Given the technical requirements of assessing the windshear impacts on buildings outside of the 1:35 Surface and the cumulative impact of surrounding development at the time of the application, a development application should be required. Therefore, it is recommended the provision be amended to exclude development that extends into the 1:35 surface from complying development as proposed below:

To be complying development for the purposes of this Policy, any proposed building or structure within the windshear assessment area as identified on the Wind Shear Restrictions Map must not breach the 1:35 surface specified in Section 4.18 of the WPC SEPP.

- Development proposals are to show building envelopes/heights in 3D against the 1:35 plane to enable assessment.
- Any development that intrudes into the building height plane will need to be accompanied by a windshear assessment in accordance with the requirements of NASF Guideline B. This may include the requirement for CFD Modelling to assess windshear impacts.

Wildlife Risk

The site is located wholly within the 0-3km Wildlife Buffer Area.

WSA notes that the landscape species proposed to be used across the site is predominately consistent with the Aerotropolis DCP Species List and where it is not consistent (i.e. in the Parkland Priority Areas) an ecologist report has been prepared.

Comments:

- The monitoring and mitigation measures detailed in Table 8 of the Wildlife Hazard Assessment Report, Revision 4, dated 21 June 2042 prepared by Eco Logical, be undertaken during construction and operation as detailed in the report and included in the site-specific section of the Aerotropolis DCP.
- The wildlife survey reports be provided to WSI within 28 days of wildlife monitoring completion, this can be included in the site-specific section of the Aerotropolis DCP.

Protected Airspace

The site is subject to the OLS Inner Horizontal Surface level of 126m AHD. As WSI's airspace design is not finalised there is no PANS-OPS surface available, however once finalised, the PANS-OPS surface will form part of WSI's protected airspace..

As the end user is unknown for future stages, the potential for plume rise from the warehouses is unknown. Future applications will be required to consider plume rise in accordance with CASA Advisory Circular AC139.E-02v1.0 Plume Rise Assessments.

Comments:

- Development that impacts protected airspace requires a controlled activity approved under the Airports (Protection of Airspace) Regulation 1996. A Controlled Activity application must be submitted to WSI for assessment and consultation with relevant Commonwealth



Agencies. WSI as the Airport Lessee Company (ALC) will assess the application and refer it to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for determination.

- Protected airspace includes the OLS and PANS-OPS as well as other surfaces. It should be noted that the PANS-OPS surface is currently being prepared). Long term intrusion into the PANS-OPS (i.e. greater than 3 months) is prohibited. This will need to be taken into consideration for the future development, in particular the constructability of future development.
- It should be noted that under SEPP (Precincts-Western Parkland City) 2021 Clause 4.22, development consent must not be granted to development unless the relevant Commonwealth body (e.g. WSI) supports it.
- It should be noted that under SEPP (Precincts-Western Parkland City) 2021 Clause 4.22, Future applications will be required to consider plume rise in accordance with *CASA Advisory Circular AC139.E-02v1.0 Plume Rise Assessments*. This should be included as conditions of consent for the complying development of first use applications where relevant and the proposed use has the potential to generate plume rise.

Communication, Navigation and Surveillance Facilities

A small portion northwestern end of the site within the Localizer 23L Building Restricted Area for the parallel runway.

WSI has referred the proposal to Airservices Australia in relation to impacts of the proposal on the future and assumed CNS facilities. Airservices have advised this could take up to six weeks, so comments will be forwarded to DPHI when received.

Comments:

- A determination of the application should not be undertaken by the consent authority until feedback is received from Airservices Australia.

Aeronautical report – general comments:

It should be noted that on Figure 4 page 12, the Aerodrome Reference Point (ARP) used in the Aviation Impact Assessment Report is incorrect and the correct level is 81m. The report should be updated to ensure that the correct ARP is used that the assessments in the report are amended as required.

5. Traffic Impact Assessment

Given the proximity of the site to the airport and the shared use of the transport network, the traffic and transport impact of the proposed future development will have a significant and potentially adverse impact on the road network.

Background traffic growth used in the assessment has been derived from TfNSW's SDTA model. WSI is of the view this model does not fully capture proposed developments in the surrounding WSI and therefore underestimates future traffic volumes, particularly along The Northern Road and Elizabeth Drive. As such, the surrounding pre-development network could be more congested than modelled, particularly along The Northern Rd and Elizabeth Drive.

Greater clarification on the development staging before the Eastern Ring Road is constructed is required. The traffic assessment also do not appear to assess how the development traffic would access Elizabeth Drive in the northbound direction without Eastern Ring Road, if Badgerys Creek Road with the airport is closed or access restricted.

The Badgerys Creek Road/Elizabeth Drive intersection is now a signalized intersection and the assessment is out-of-date as the baseline intersection operation was for a roundabout configuration. The baseline assessment should be reviewed, particularly the stated Level of Service of the intersection. It is considered that the traffic impact to this intersection has been adequately assessed.

In relation to the traffic modelling that has been undertaken, WSI provides the following comments:

- The traffic generation rate assessment has utilised profiles to identify an overall peak hour. Has there been any consideration of the impacts if the individual land use profile peaks were more closely aligned? i.e. closer timing of industrial and commercial peaks.
- While it is noted that the traffic generation rates for industrial development were derived from 2019 surveys, these trip rates are on the lower end compared to the 2013 RMS surveys and Guide to Traffic Impact Assessment (TfNSW, 2024).
- The development has a significant impact on intersections along Badgerys Creek Road south, The Northern Road and Eastern Ring Road. This is particularly pronounced in the PM peak period. Mitigations are required in both 2036 and 2041 modelling years to improve intersection performance, but only to a Level of Service D.
- Trip generation rates applied to the business park and local centre commercial development adopted the very ambitious Precinct Plan mode share targets. There should also be an assessment the considers the impact on the wider road network if these targets were not achieved. The adoption of the aspirational Aerotropolis mode share targets has the potential to under estimate vehicle trip generated by the proposed development.
- A range of mitigation measures were assessed with full development case. However, the assessment did not indicate whether those mitigations would be delivered either by the proponent or TfNSW. It is noted that even with the proposed mitigations, the network would still operate with high delay. Such congestion would significantly impact access to WSI given passengers, staff and air cargo would also utilise the Eastern Ring Road and The Northern Road.
- The approach to trip distribution to the wider network and the relative proportions assumed have not been documented in the reports. Further information should be provided in relation to the trip distribution.
- Section 7.2 of the TMAP report does not provide any trip generation estimates for 2030 which should be documented as it is likely there will not major upgrades to the road network (e.g Elizabeth Drive, Eastern Ring Road etc) and therefore the trips generated by the development will likely have an adverse impact on the road network.

The sequencing/staging of the development is unclear. The sequence of development staging, particularly the quantum of development forecast for 2026 and 2036 should be clarified.



Louise Densmore
A/Director Regional Assessments
Department of Planning, Housing and Infrastructure
12 Darcy Street
PARRAMATTA NSW 2150

28 January 2025

Exhibition of IPG Badgerys Creek Road Master Plan (WSA_MP01) – Complying Development and Flooding Advice

I refer to your letter to the Biodiversity Conservation and Science Group (BCS), regarding the exhibition of the proposed IPG Badgerys Creek Road Master Plan. Please note that as 20 January 2025, BCS became the Conservation Programs, Heritage and Regulation Group (CHPR).

I apologise for delay in responding. Please find at Attachment A CPHR's complying development and flooding advice. Advice on waterway health and consistency with the *Order to confer biodiversity certification on the State Environmental Planning Policy (Sydney Region Growth Centres) 2006* will follow shortly.

If you have any further questions about this issue, please contact Greater Sydney Planning Team at rog.gsrplanning@environment.nsw.gov.au.

Yours sincerely

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

**CPHR Advice - Exhibition of IPG Badgerys Creek Road Master Plan (WSA_MP01) –
Complying Development and Flooding**

Complying Development

BCS provided comments on complying development in Section 3.11 in March 2024. The Response to BCS's comments on complying development states, "The controls around flood prone land are nominated in Section 2.3.1 of the IPG Code. This provides a very limited range of works that can be undertaken on this land, none of which would be habitable buildings.....".

CPHR does not agree with the above response as Section 2.3.1 of the IPG Code does not provide a very limited range of works. Instead, it identifies a range of works including:

- water and stormwater management such as flooding and stormwater works, including on-site detention
- structures, swales, water sensitive urban design structures, gross pollutant traps and trunk drainage
- pipes
- environmental facilities.
- public park or reserve
- environmental protection works
- local roads and road infrastructure.

These proposed works would modify the landform and have the potential to significantly alter flood behaviour, particularly as most of the works would be located within the flood function constraints areas being floodways and flood storage areas. It should be noted that, considering flooding in development is not limited to urban development or habitable buildings, rather it includes any works on the floodplains as they have the potential to alter flood behaviour and associated impacts.

Flooding

In March 2024, BCS provided two recommendations on Flooding in Section 3.14.

Recommendation 1:

- A review of the modelling to include changes to land outside the urban development footprint including within the floodways and flood storage areas is required. The post development modelling for hydrology and hydraulics should include any proposed use of land, including but not limited to, urban development, earthworks, drainage infrastructure, proposed detention basin network and any propose vegetation and use of land within the green/blue corridor and open space areas (as described in the Riparian Assessment Report).

The IWCM Report (idc, June 2024) Section 3.6 and Section 5.3 shows that the post-development model includes proposed water quality basins, paths, maintenance tracks that are located within the floodways and flood storage areas.

However, the three proposed regional detention basins along Badgerys Creek tributaries have been represented using outflow weirs without inclusion in the post development model. This approach may be acceptable for this stage of the Master Plan due to a lack of information on the concept design of these basins.

CPHR highlights that the regional detention basins should be included in the model when information from Sydney Water becomes available at a later stage of the development of the Master Plan, prior to the approval of these detention structures.

The incorporation of these regional detention basins in the detailed modelling is essential to ensure that the arrival of attenuated flow from Badgerys Creek at the confluence with South Creek does not coincide with South Creek peak flow. The Wianamatta South Creek catchment Flood Study – Cumulative Impact Assessment (Advisian, January 2023) includes the following recommendation:

“No large scale stormwater detention for the purpose of attenuating flood flows of the magnitude of the 5% AEP event or rarer is required in the Thompsons Creek and Badgerys Creek (except at the Western Sydney Airport) catchments. The only caveat on this is where detention is afforded as part of measures proposed for the primary purpose of controlling surface water runoff.”

Recommendation 2:

- Based on this revised modelling, update the flood assessment and address the Aerotropolis DCP requirements/provisions for the whole Master Plan area which includes the three categories of the floodplains identified by the DCP.

The Revised IWCM (idc, June 2024) has addressed this recommendation with the current available information. However, as mentioned above about the lack of information on regional detention basins, the approval of these basins should address the relevant provisions of the DCP based on an amended FIRA.

It should be noted that the IWCM has not addressed BCS comments on Reporting including:

- The reporting for the hydrology in Section 3 was limited to the results of the peak flow at the critical nodes. It is prudent to report on the shape of the flood hydrograph at critical downstream nodes including but not limited to, nodes 5.01, 5.02 and 1.13 to ensure it is generally maintained in the post development condition for events up to and including the 1% AEP flood event.
- The maps must be provided for the extent of the hydraulic model, not trimmed to the site as currently presented.
- The maps for existing and post development conditions should include flood extent, depth, level, velocity, flood function and hazard for the full range of events, including 5% AEP, 1% AEP, PMF and 0.5% AEP or 0.2% AEP.
- Impact maps should include changes to flood extent, depth, level, velocity, flood function and hazard.

End Of Submission

Our ref: HMS ID 7942

Your ref: IPG Badgerys Creek Road Master Plan

James Gibbeson

Department of Planning, Housing and Infrastructure
PO BOX 404, PARRAMATTA NSW 2124

Attention: james.gibbeson@planning.nsw.gov.au

Subject: Badgerys Creek Road Master Plan - 475 Badgerys Creek Road, Bradfield

Dear Mr Gibbeson,

Thank you for the opportunity to provide advice on the draft Master Plan for the site at 475 Badgerys Creek Road Bradfield under State Environmental Planning Policy (SEPP) (Precincts - Western Parkland City) 2021. We note that the Master Planning process is specifically enabled under guidelines supporting this SEPP, which establish the Master Planning process for land within the Western Sydney Aerotropolis area.

We understand that this Master Plan will facilitate a total developable area of 102.3 hectares, divided as follows:

- 25 lots comprising 23 enterprise lots and 2 commercial lots
- Maximum height provisions of 24-52.5m to enable high bay loading warehousing
- 456,600sqm open space and landscaped areas
- Site specific Development Control Plan
- Design quality strategy and Design Verification checklist.

It is noted that on 3 May 2023, the Technical Assurance Panel (TAP) provided their formal endorsement of the Master Plan. The TAP also provided conditions to be addressed prior to public exhibition. The Master Plan documentation states that it addresses the TAP Conditions as recommended. As noted by the TAP, a Heritage Interpretation Strategy does not appear to have been prepared. We support the development of this strategy to inform future planning and development of this land, with reference to the Connecting to Country Framework Report prepared by Yerrabingin (June 2024).

We have reviewed the draft Master Plan and supporting documentation and prepared the following advice :

Aboriginal cultural heritage considerations under the National Parks and Wildlife Act 1974

An Aboriginal Cultural Heritage Assessment Report was prepared by EcoLogical Australia in 2022, and archaeological test excavations were conducted in 2023 for Stage 1 and Stage 2 of the Master Plan. This report has identified impacts on Aboriginal cultural heritage as protected under the National Parks and Wildlife Act 1974, including:

- that no Aboriginal objects will be harmed by the proposed Stage 1 (substation) works.
- that direct and indirect impacts will occur to several stone artefact sites through the proposed Stage 2 (enterprise and light industry works).

The Aboriginal cultural heritage assessment report (Ecological Australia 2022) identifies Badgerys Creek and South Creek, and the Aboriginal objects along those creek lines, as having high Aboriginal cultural significance. We support the conservation of the riparian corridors along these creek lines and note that this is reflected in the Master Plan. The Aboriginal community consultation process outlined in the Aboriginal cultural heritage assessment report (Ecological Australia 2022) did not raise objections to the proposal.

We recommend that the Aboriginal cultural heritage assessment report (Ecological Australia 2022) clarifies the assessment and mapping of potential culturally modified trees. Heritage NSW does not support any impacts to culturally modified trees.

Heritage NSW recommends that future planning instruments for this proposal include provisions to:

- implement appropriate management strategies to protect Aboriginal objects and archaeological deposits within proposed open space areas.
- limit impacts to those sites within the riparian corridors along Badgerys Creek and South Creek, noting the high Aboriginal cultural significance of these waterways.

The Aboriginal Cultural Heritage Assessment Report needs to be updated to support the anticipated future integrated development applications and Aboriginal heritage impact permit applications. The Aboriginal Cultural Heritage Assessment Report needs to be prepared in accordance with Heritage NSW's [Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales](#) and include:

- a detailed impact assessment that describes specific site works and provides detailed mapping of site boundaries and impact areas.
- a procedure for ongoing consultation with the registered Aboriginal parties. The Aboriginal Cultural Heritage Assessment Report needs to demonstrate continuous consultation with the registered Aboriginal parties. Breaks in contact of over six months are unlikely to constitute continuous consultation and may mean that the consultation process needs to be restarted.
- Clarify why test excavation was conducted at site 45-5-5370, which the Aboriginal Cultural Heritage Assessment Report states that this site will not be harmed by the proposed works.

State heritage and historical archaeological considerations under the Heritage Act 1977

Based on the information provided, we have reviewed the draft Master Plan proposal against our records and do not believe that there are any identified impacts on items listed on the State Heritage Register, nor are there any identified impacts on historical archaeology.

General advice

Heritage NSW offers a pre-lodgement service to help proponents understand assessment requirements or provide general advice on:

- Aboriginal cultural heritage under the National Parks and Wildlife Act 1974
- State Heritage Register items and historical archaeology under the Heritage Act 1977
- Maritime heritage under the Heritage Act 1977 and the Commonwealth Underwater Cultural Heritage Act 2018.

If you have any questions about the above, please contact Nancy Sample, Senior Planning Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au.

Yours sincerely

Michael Ellis.

Michael Ellis

Manager Planning Referrals and Advice

Heritage NSW

As delegate of the Heritage Council of NSW and for Heritage NSW

12 December 2024

Louise Densmore
A/Director, Regional Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square
PARRAMATTA NSW 2150

CC: Stuart Withington <stuart.withington@planning.nsw.gov.au>

Dear Ms Densmore

Re: Draft IPG Badgerys Creek Road Master Plan

Thank you for consulting the Bradfield Development Authority (the Authority) on the draft IPG Badgerys Creek Road Master Plan for 475 Badgerys Creek Road, Bradfield (Lots 99 & 100, DP 1287207) and the proposed consequential amendments to State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (Precincts SEPP).

The Authority was a member of the Technical Assurance Panel (TAP), which endorsed the draft Master Plan in May 2024. The Authority supports the finalisation and approval of the draft Master Plan, as it delivers the vision of the Aerotropolis Core Precinct and the Western Sydney Aerotropolis. The Authority makes the following comments for the Department's consideration:

- The Western Sydney Aerotropolis planning framework should be updated to reflect all changes proposed by the draft Master Plan to ensure surrounding development remains co-ordinated. This includes the realignment of Eastern Ring Road and the consequential impacts on adjoining properties which will require adjustment of infrastructure and amendments to land acquisition mapping.
- The draft Master Plan proposes that buildings constructed as part of the development would exceed the current maximum building height controls in the SEPP. The Authority notes and endorses the proposed SEPP amendment to enable the proposed heights. The Authority recommends that the Department considers reviewing the current maximum building heights across the Western Sydney Aerotropolis holistically to potentially enable a wider range of development opportunities, rather than considering variations on a site by site basis.

The Authority has reviewed the proposed amendments to the Aerotropolis Precinct Plan in the context of section 4.38(5A) of the Precincts SEPP and supports these as the proposal:

- Provides opportunities for the creation of active, vibrant, and sustainable communities through the provision of a local centre and public open spaces with pedestrian and cycling networks;
- Delivers a range of employment generating uses that will support the Western Sydney International Airport; and
- Outlines a plan to deliver transport and stormwater infrastructure in line with the Aerotropolis Precinct Plan.

It is acknowledged that as part of the assessment process, the Department is undertaking a detailed assessment and consulting with various stakeholders, including Liverpool City Council,

Bradfield Development Authority



Transport for NSW, Sydney Water, and landowners on the satisfaction of the proposal. If you require additional information or wish to discuss this Letter please contact Gina Metcalfe, Director, Aerotropolis Strategy and Coordination at gina.metcalfe@bda.nsw.gov.au or 0436 655 821.

Yours sincerely

A handwritten signature in black ink, appearing to be "GB", followed by a horizontal line.

Gavin Boswarva
Executive Director Infrastructure and Delivery
12 December 2024

Department of Planning, Housing and Infrastructure
Attn: Andrew Watson
4 Parramatta Square, 12 Darcy Street,
Parramatta NSW 2150

Re: Consultation – DPIRD Fisheries Feedback on the Draft IPG Badgerys Creek Masterplan – 475
Badgerys Creek Road, Bradfield NSW 2556

Dear Andrew,

Thank you for your referral via email on 15 November 2024 seeking comment on the Draft IPG Badgerys Creek Masterplan from Fisheries, a division of NSW Department of Primary Industries and Regional Development (DPIRD) on the proposed works stated above.

DPIRD Fisheries is responsible for ensuring that fish stocks are conserved and that there is no net loss of key fish habitats upon which they depend. To achieve this, DPIRD Fisheries ensures that developments comply with the requirements of the *Fisheries Management Act 1994* (FM Act) namely the aquatic habitat protection and threatened species conservation provisions in Parts 7 and 7A of the Act, respectively, and the associated *Policy and Guidelines for Fish Habitat Conservation and Management (2013)*. DPIRD Fisheries is also responsible for ensuring the sustainable management of commercial, recreational and Aboriginal cultural fishing, aquaculture, marine parks and aquatic reserves in NSW.

Wianamatta South Creek and Badgerys Creeks are classified as key fish habitat (KFH). These creeks are most likely a Class 2 or 3 waterway and are adjacent to the site in the east and the west. Best practice development of this site should ensure the maintenance and improvement of key fish habitat by:

- protection and improvement of riparian habitat values;
- protection of aquatic habitat; and
- protection or improvement of water quality through water sensitive urban design, adequate stormwater treatment and best practice erosion and sediment control measures during construction.

DPIRD Fisheries has reviewed the masterplan and relevant appendices and has the following recommendations:

1. DPIRD Fisheries recommends that riparian buffer zone widths be implemented as outlined in DPIRD Fisheries Policy & Guidelines s.3.2.4.2(2). Riparian buffer zones should be measured from the top of the bank. As a guide, a buffer zone of 50m is recommended for Class 2-3 waterways.
2. The design of the riparian buffer zone is consistent with DPIRD Fisheries Policy & Guidelines s.3.2.4.2(3) that the design of riparian buffer zones incorporates the maintenance of lateral connectivity between aquatic and riparian habitat. The masterplan avoids or minimises the installation of infrastructure, terraces, retaining walls, cycle ways, pathways and grass verges within the riparian buffer zone as recommended.
3. Section 8.1 Blue Green Strategy of the Masterplan should aim to include enhancement of in stream key fish habitat features, including native in-stream vegetation and snags.
4. DPIRD Fisheries treats artificial habitats (such as connected WSUD ponds) that are linked to natural habitats upstream as 'on-line systems' and requires that the created ponds provide for connectivity between habitats including continuous fish passage.

If you require any further information, please contact me on jess.hyland@dpi.nsw.gov.au.

Sincerely,



Jess Hyland

Fisheries Manager, Coastal Systems



RFS



Department of Planning, Housing & Infrastructure (Parramatta)
Locked Bag 5022,
PARRAMATTA NSW 2124
Australia

Your reference: WSA-MP01
Our reference: SPI20241127000250

ATTENTION: James Gibbeson

Date: Tuesday 4 February 2025

Dear Sir/Madam,

**Strategic Planning Instrument
Other – Exhibition**

Proposed changes to current planning controls to facilitate IPG Badgerys Creek Road Master Plan including amendments to the Western Parklands City SEPP for 475 Badgerys Creek Road Bradfield

I refer to your correspondence dated 15/11/2024 inviting the NSW Rural Fire Service (NSW RFS) to comment on the above Strategic Planning document.

The NSW RFS has considered the information submitted and provides the following comments.

Based on a review of the documentation provided in relation to amending the current planning controls including amendments to the *State Environmental Planning Policy (Precincts—Western Parkland City) 2021* to facilitate the IPG Badgerys Creek Road Master Plan located at 475 Badgerys Creek Road Bradfield (Lots 99 and 100 in DP1287207), it is advised that the planning proposal and the indicative layout plan (ILP) generally aligns with the aim and objectives of *Planning for Bush fire Protection (PBP) 2019* and future developments will need to comply with the relevant sections of *PBP 2019*.

The following points must be considered for parcels of land affected by bush fire prone vegetation in future:

- The riparian corridors will need to be managed in accordance with the Vegetation Management Plan (Project Number 23SYD 5218, Version Number 4, dated 21 June 2024, prepared by Eco Logical Australia) in order to avoid increasing the bush fire risk within the proposed development. Plans of Management (PoM) must be considered for lands belonging to council or government where there is no guaranteed commitment to future management.
- It is understood that most of the lots will be utilised for warehouses, however, it must be noted that the objectives of Enterprise zone encourage education and creative industries which may fall under special fire protection purpose (SFPP) developments identified under the *Rural Fires Act 1997*. It is advised that such developments must be located away from the bush fire hazard and must comply with the provisions of Chapter 6 of *PBP 2019*.

Postal address

NSW Rural Fire Service
Locked Bag 17
GRANVILLE NSW 2142

Street address

NSW Rural Fire Service
4 Murray Rose Ave
SYDNEY OLYMPIC PARK NSW 2127

T (02) 8741 5555
F (02) 8741 5550
www.rfs.nsw.gov.au



RFS



- Reticulated water supply, hydrant systems, and other utilities including electricity and gas services will need to be provided throughout the development in accordance with *PBP 2019* to facilitate fire fighting operations.

Based on the recommendations provided in the Bushfire Assessment Report (version 3.0, dated 17 June 2024, prepared by Blackash Bushfire Consulting), all the proposed lots are capable of meeting a minimum standard of BAL-29 construction for the indicated building envelopes on each proposed lot, and as such, the proposed changes to planning controls to facilitate the master plan, including amendments to the Western Parklands City SEPP, the Western Sydney Aerotropolis Precinct Plan shall be undertaken to include all development lots. This is subject to provision of asset protection zones as shown in Figures 19 and 20 of the Bush fire Assessment Report.

For any queries regarding this correspondence, please contact Rohini Belapurkar on 1300 NSW RFS.

Yours sincerely,

Adam Small
Supervisor Development Assessment & Plan
Built & Natural Environment

Our Ref: ID 2796
Your Ref: EF24/7101

12 December 2024

Andrew Watson
Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Via email

email: andrew.watson@planning.nsw.gov.au
CC: shelly.stingmore@one.ses.nsw.gov.au

Dear Andrew,

Draft Ingham Property Group (IPG) Badgerys Creek Road Master Plan

Thank you for the opportunity to provide comment on the Draft IPG Badgerys Creek Road Master Plan, 475 Badgerys Creek Road, Bradfield. It is understood that the Master Plan consists of:

- A total of 25 lots which include 23 enterprise lots and 2 commercial lots.
- An enterprise precinct supporting warehouse and distribution, logistics and light industrial uses.
- A local centre supporting business and commercial uses, complemented by retail amenity.
- The delivery of 456,600m² of open space including passive and active space across three riparian corridors and the local park.
- Site-specific complying development controls.

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunamis in NSW. This role includes, planning for, responding to and coordinating the initial recovery from floods. As such, the NSW SES has an interest in the public safety aspects of the development of flood prone land, particularly the potential for changes to land use to either exacerbate existing flood risk or create new flood risk for communities in NSW.

The consent authority will need to ensure that the planning proposal is considered against the relevant Section 9.1 Ministerial Directions, including 4.1 – Flooding and is consistent with the NSW Flood Prone Land Policy as set out in the Flood Risk Management Manual 2023 (the Manual) and supporting guidelines, including the Support for Emergency Management Planning. Key considerations relating to emergency management are outlined in Attachment A.

In summary, we recommend:

- Any future development considers design features to improve safety for site users and the wider community, such as providing flood free access/egress and locating all basement openings (ramps, vents, etc.) above the Probable Maximum Flood (PMF) level.
- Pursuing site design and stormwater management that reduces the impact of flooding and minimises any risk to the community. Any improvements that can be made to reduce flood risk will benefit the community.
- Ensuring users of the development, including workers during the construction phase are made aware of their flood risk, for example through site inductions, signage and other flood information tools.
- Ensuring that the proposed green space around the three riparian corridors are sized to ensure the footprint of business and commercial development does not enter areas of significant flood risk.
- Any green space located on flood prone land is appropriately sign posted to ensure site users are aware of the risk.

You may also find the following Guidelines, originally developed for the Hawkesbury Nepean Valley and available on the NSW SES website useful:

- [Reducing Vulnerability of Buildings to Flood Damage](#)
- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

Please feel free to contact Kate Dawes via email at rra@ses.nsw.gov.au should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Cinque'.

Peter Cinque
Senior Manager Emergency Risk Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline¹

Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.

Any proposed Emergency Management strategy for an area should be compatible with the evacuation strategies identified in the relevant local or state flood plan or by the NSW SES. As per the NSW State Flood Plan² and the Liverpool City Flood Emergency Sub Plan, evacuation is the primary emergency management strategy for people impacted by flooding.³

Principle 2 Decisions should be informed by understanding the full range of risks to the community.

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed.

Further, risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF) and not focus only on the 1% Annual Exceedance Probability (AEP) flood. Climate change considerations should also be included, in line with NSW Government Guidelines.

The site is bound by South Creek to the east Badgerys Creek to the north-west and contains two modified drainage channel waterways.⁴ Parts of the site are affected by flooding as frequently as the 5% AEP event in the areas surrounding the existing creeks and drainage channels⁵. During the PMF event flooding reaches depths of up to 4 metres in the proposed scenario in the areas of the existing creeks and proposed detention basins.⁶

It is noted that while the development master plan shows flooding up to the PMF is largely contained within the proposed riparian corridors and green spaces with *“Minor encroachment of floodwaters exists in some isolated lots in the PMF event”*⁷, roads within the precinct and access/egress roads may become cut by flooding during the 1% AEP, and larger flood events.⁸ We recommend pursuing site design and stormwater management which reduces the impacts

¹ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

² NSW Government. 2021. NSW State Flood Plan. Section 1.6 – Key Principles. 1.6.2, page 5.

³ NSW SES, Liverpool City Flood Emergency Sub Plan, Endorsed April 2023, Section 5.8

⁴ IDC, 2024, Integrated Water Cycle Management Strategy, Section 1.1 The Site, Page 7

⁵ IDC, 2024, Integrated Water Cycle Management Strategy,

⁶ IDC, 2024, Integrated Water Cycle Management Strategy, Figure PMFP-1, Page 116

⁷ IDC, 2024, Integrated Water Cycle Management Strategy, Section 5.7 Summary and Recommendations, Page 66

⁸ IDC, 2024, Integrated Water Cycle Management Strategy, Figure 35 – DCP Flood Zones, Page 65

of flooding and considering design features which improves the safety of the site, such as providing flood free access/egress.

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development.

Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes. Evacuation must not require people to drive or walk through flood water.

Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.

The Integrated Water Cycle Management Strategy states *“Basement car parks can be provided however access ramps need to be constructed above the flood planning level and the basement roof should be constructed below the existing surface level”*.⁹ Basement car parks have inherent risks to life and property¹⁰ and can often restrict safe evacuation of the occupants. This can be managed through building design, such as crest levels above a certain level (e.g. the PMF) to prevent water ingress and flooding.

Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.

Managing flood risks requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

- Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

⁹ IDC, 2024, Integrated Water Cycle Management Strategy, Section 5.3.7 Summary of Results, Page 61

¹⁰ Collier, L. Phillips, B., and Griffin, M. 2017. Basement Development in the Floodplain. Floodplain Management Australia Conference. Newcastle, 2017

Principle 5 Risks faced by the itinerant population need to be managed.

Any Emergency Management strategy needs to consider people visiting the area or using a development.

Principle 6 Recognise the need for effective flood warning and associated limitations.

As the site is subject to flash flooding, there is limited opportunity for the community to respond to a flood threat in an appropriate and timely manner.

Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.

Development in a floodplain will increase the need for NSW SES to undertake continuous community awareness, preparedness, and response operations.

The flood risk at the site and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) during and after the construction phase. However, it is important to note that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.

27 November 2024

Contact: Stuart Little
Telephone: 0436 948 347
Our ref: D2024/131780

Ms Louise Densmore
A/Director, Regional Assessments
NSW Planning
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

RE: Exhibition of IPG Badgerys Creek Road Master Plan (WSA_MP01)

Dear Ms Densmore,

Thank you for your letter of 15 November 2024 advising WaterNSW about the public exhibition of the proposed IPG Badgerys Creek Road Master Plan for development at 475 Badgerys Creek Road, Bradfield (Lots 99 and 100 DP 1287207).

We have examined the Draft Master Plan and associated Discussion Paper and Explanation of Intended Effect (EIE) documents.

We have no land or assets in the immediate area. The site is located approximately 5 km west of the Upper Canal and 7 km south of the Warragamba Pipelines Corridor which WaterNSW owns and operates. As such, we have no comment to make on the Master Plan and associated documents.

Please note that for later developments proposed on the site which are not State Significant Development (SSD), water supply work approvals may be required from WaterNSW such as for temporary dewatering purposes.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alison Kniha", with a long horizontal stroke extending to the right.

ALISON KNIHA
Environmental Planning Assessments & Approvals Manager



File Ref. No: FRN25/381 BFS25/456 8000040452
TRIM Doc. No: D25/6914
Contact: Inspector Lynden Moyes

22 January 2025

Louise Densmore
Acting Director, Regional Assessments
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Louise,

Re: Exhibition of IPG Badgerys Creek Road Master Plan (WSA_MP01)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 15 November 2024, requesting commentary on the proposed IPG Badgerys Creek Road Master Plan (WSA_MP01).

FRNSW have reviewed the documentation with particular focus to Appendix GG Fire Safety Strategy and Appendix I Exempt and Complying Development Justification Report. FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.

For further information please contact the Operational Liaison and Special Hazards Unit, referencing FRNSW file number BFS25/456. Please ensure that all correspondence in relation to this matter is submitted electronically to FireSafety@fire.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "James O'Carroll".

Superintendent James O'Carroll
Manager
Operational and Liaison and Special Hazards Unit

Cc: James.gibbeson@planning.nsw.gov.au

From: [Airspace Protection](#)
To: [Andrew Watson](#)
Cc: [James Gibbeson](#); [Airspace Protection](#)
Subject: CM Record: F20/2574-5 CASA response - Notice of Exhibition - IPG Badgerys Creek Road Master Plan (WSA_MP01) [SEC=OFFICIAL]
Date: Tuesday, 3 December 2024 1:54:11 PM
Attachments: [image003.png](#)

OFFICIAL

Good afternoon

I refer to your advice regarding the exhibition of the Master Plan for the proposed development at 475 Badgerys Creek Road, Bradfield.

CASA has discussed this matter with Mr James Gibbeson from NSW DHPI.

CASA is satisfied that the Airports (Protection of Airspace) Regulations 1996 will be applied by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) in the event that the operator of Western Sydney International (WSI) Airport raises concerns about the potential impact on aircraft operations from the proposed development.

Thank you for providing CASA the opportunity to comment.

Regards,

Dilip Mathew
Principal Aerodrome Specialist
Air Navigation, Airspace and Aerodromes
CASA\ Air Navigation, Transformation and Risk Division
P: 131 757

From: Andrew Watson <Andrew.Watson@planning.nsw.gov.au>
Sent: Friday, November 15, 2024 2:28 PM
To: Airspace Protection <Airspace.Protection@casa.gov.au>
Cc: James Gibbeson <james.gibbeson@planning.nsw.gov.au>
Subject: RMS: Notice of Exhibition - IPG Badgerys Creek Road Master Plan (WSA_MP01)

Attn: Civil Aviation Safety Authority
Airspace Protection Team

To whom it may concern,

The Department of Planning, Housing and Infrastructure will be exhibiting the proposed IPG Badgerys Creek Road Master Plan.

The Master Plan will be on public exhibition from **Friday 15 November 2024** until **Friday 13 December 2024**.

The Master Plan and accompanying documents can be viewed on the NSW Planning portal at <https://www.planningportal.nsw.gov.au/ipg-master-plan>.

The Department invites your Agency to provide comments on the Master Plan by **Friday 13 December 2024**.

If you have any enquiries, please contact James Gibbeson on (02) 8289 6963 or via email at james.gibbeson@planning.nsw.gov.au.

Kind regards,

Andrew Watson

DA Coordinator

Key Sites and Regional Assessments

Department of Planning, Housing and Infrastructure

T 02 8275 1645 | E Andrew.Watson@planning.nsw.gov.au

dphi.nsw.gov.au

4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150



Our Vision: Together, we create thriving environments, communities and economies.

The Department of Planning, Housing and Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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Development Application and Planning Proposal Review NSW Planning Portal Concurrence and Referral



Authority	Authority's Reference	Agency Concurrence and Referral	Authority Contact	Authority Notification	Submission Due	Submission Made
NSW Dept. of Planning, Housing & Infrastructure	WSA_MP01		James Gibbeson	15/11/2024	13/12/2024	12/12/2024

Address	Land Title
475 Badgerys Creek Road, Bradfield	Lot 100 DP 1287207

Scope of Development Application or Planning Proposal

Draft Ingham Property Group (IPG) Badgerys Creek Road Master Plan.

Endeavour Energy's G/Net master facility model indicates:

Within or adjacent to the property the electrical network used in the distribution / supply of electricity are:

Electricity Infrastructure / Apparatus	Statutory allocation (road verge / roadway*)	Easement (or other form of property tenure**)	Protected works***	Freehold (adjoining or nearby)
Overhead Power Lines				
<input checked="" type="checkbox"/> Low voltage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> High voltage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Transmission voltage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> Pole / tower	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Underground Cables				
<input type="checkbox"/> Low voltage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> High voltage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Transmission voltage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Streetlight / pillar	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Substation				
<input type="checkbox"/> Pole mounted	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Padmount	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Indoor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/> Zone	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/> Transmission	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Low voltage extra low voltage up to 1,000 volts alternating current (a.c.).

High voltage above 1,000 volts a.c and less than 33,000 volts a.c. [33 kilovolts (kV)].

Transmission voltage 33 kV up to 132,000 volts a.c. (132 kV).

*Rights provided in a public road or reserve. The allocation depends on the classification and date of roadway dedication.

** Other form of property tenure includes but is not limited to restriction, covenant, lease, licence etc.

***Protected works under Section 53 'Protection of certain electricity works' of the *Electricity Supply Act 1995* (NSW).

Other: provide detail of electricity infrastructure / apparatus.

Relevant / applicable clause numbers from Endeavour Energy's standard conditions for Development Application and Planning Proposal Review indicated by ☒ .

Condition	Advice	Clause No.	Issue	Detail
<input checked="" type="checkbox"/>	<input type="checkbox"/>	1	Adjoining Sites	Adjoining or nearby development / use should be compatible with the use of Endeavour Energy's sites.
<input type="checkbox"/>	<input type="checkbox"/>	2	Asbestos	Area identified or suspected of having asbestos or asbestos containing materials (ACM) present in the electricity network.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	3	Asset Planning	Applicants should not assume adequate supply is immediately available to facilitate their proposed development.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	4	Asset Relocation	Application must be made for an asset relocation / removal to determine possible solutions to the developer's requirements.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	5	Before You Dig	Before commencing any underground activity the applicant must obtain advice from the Before You Dig service.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	6	Bush Fire	Risk needs to be managed to maintain the safety of customers and the communities served by the network.
<input type="checkbox"/>	<input type="checkbox"/>	7	Construction Management	Integrity of electricity infrastructure must be maintained and not impacted by vehicle / plant operation, excessive loads, vibration, dust or moisture penetration.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	8	Contamination	Remediation may be required of soils or surfaces impacted by various forms of electricity infrastructure.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	9	Demolition	All electricity infrastructure shall be regarded as live and care must be taken to not interfere with any part of the electricity network.
<input type="checkbox"/>	<input type="checkbox"/>	10	Dispensation	If a proposal is not compliant with Endeavour Energy's engineering documents or standards, the applicant must request a dispensation.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	11	Driveways	For public / road safety and to reduce the risk of vehicle impact, the distance of driveways from electricity infrastructure should be maximised.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	12	Earthing	The construction of any building or structure connected to or in close proximity to the electrical network must be properly earthed.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	13	Easement Management	Preference is for no activities to occur in easements and they must adhere to minimum safety requirements.
<input type="checkbox"/>	<input type="checkbox"/>	14	Easement Release	No easement is redundant or obsolete until it is released having regard to risks to its network, commercial and community interests.
<input type="checkbox"/>	<input type="checkbox"/>	15	Easement Subdivision	The incorporation of easements into to multiple / privately owned lots is generally not supported.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	16	Emergency Contact	Endeavour Energy's emergency contact number 131 003 should be included in any relevant risk and safety management plan.
<input type="checkbox"/>	<input type="checkbox"/>	17	Excavation	The integrity of the nearby electricity infrastructure shall not be placed at risk by the carrying out of excavation work.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	18	Flooding	Electricity infrastructure should not be subject to flood inundation or stormwater runoff.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	19	Hazardous Environment	Electricity infrastructure can be susceptible to hazard sources or in some situations be regarded as a hazardous source.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	20	Look up and Live	Before commencing any activity near overhead power lines the applicant must obtain advice from the Look Up and Live service.
<input type="checkbox"/>	<input type="checkbox"/>	21	Modifications	Amendments can impact on electricity load and the contestable works required to facilitate the proposed development.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	22	Network Access	Access to the electricity infrastructure may be required at any time particularly in the event of an emergency.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	23	Network Asset Design	Design electricity infrastructure for safety and environmental compliance consistent with safe design lifecycle principles.

Condition	Advice	Clause No.	Issue	Detail
<input checked="" type="checkbox"/>	<input type="checkbox"/>	24	Network Connection	Applicants will need to submit an appropriate application based on the maximum demand for electricity for connection of load.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	25	Protected Works	Electricity infrastructure without an easement is deemed to be lawful for all purposes under Section 53 'Protection of certain electricity works' of the <i>Electricity Supply Act 1995</i> (NSW).
<input type="checkbox"/>	<input checked="" type="checkbox"/>	26	Prudent Avoidance	Development should avert the possible risk to health from exposure to emissions from electricity infrastructure such as electric and magnetic fields (EMF) and noise.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	27	Public Safety	Public safety training resources are available to help general public / workers understand the risk and how to work safely near electricity infrastructure.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	28	Removal of Electricity	Permission is required to remove service / metering and must be performed by an Accredited Service Provider.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	29	Safety Clearances	Any building or structure must comply with the minimum safe distances / clearances for the applicable voltage/s of the overhead power lines.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	30	Security / Climb Points	Minimum buffers appropriate to the electricity infrastructure being protected need to be provided to avoid the creation of climb points.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	31	Service Conductors	Low voltage service conductors and customer connection points must comply with the 'Service and Installation Rules of NSW'.
<input type="checkbox"/>	<input type="checkbox"/>	32	Solar / Generation	The performance of the generation system and its effects on the network and other connected customers needs to be assessed.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	33	Streetlighting	Streetlighting should be reviewed and if necessary upgraded to suit any increase in both vehicular and pedestrian traffic.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	34	Sustainability	Reducing greenhouse gas emissions and helping customers save on their energy consumption and costs through new initiatives and projects to adopt sustainable energy technologies.
<input type="checkbox"/>	<input type="checkbox"/>	35	Swimming Pools	Whenever water and electricity are in close proximity, extra care and awareness is required.
<input type="checkbox"/>	<input type="checkbox"/>	36	Telecommunications	Address the risks associated with poor communications services to support the vital electricity supply network infrastructure.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	37	Vegetation Management	Landscaping that interferes with electricity infrastructure is a potential safety risk and may result in the interruption of supply.
Decision				Approve (with conditions)

Environmental Services Team

P 133 718

E Property.Development@endeavourenergy.com.au

Level 40-42, 8 Parramatta Square, 10 Darcy Street
Parramatta NSW 2150.

Dharug/Wiradjuri/Dharawal/Gundungurra/Yuin Country

endeavourenergy.com.au |    



**Endeavour
Energy**

**POWER
together**



Endeavour Energy respectfully acknowledges the Traditional Custodians on whose lands we live, work, and operate and their Elders past and present.

Reason(s) for Conditions or Objection (If applicable)

- As an adjoining or nearby owners and occupiers, Endeavour Energy's Bradfield North Zone Substation (Lot 99 DP 1287207) being a non-habitable building / site is comparatively less impacted by the surrounding proposed development.

The site has a right of access from Badgerys Creek Road and there are associated easements for underground cables currently do not have any 'Inservice' electricity distribution. There is an easement for batters to the northern and eastern boundaries over the adjoining property. These are detailed in the below extract of DP 1287207.


However if there are any works or activities that are likely to impact Endeavour Energy's Bradfield North Zone Substation, the applicant / developer must make reasonable prior contact with Endeavour Energy's Strategic Property Manager, Simon Lawton on mobile 0418 554 414 or alternatively by email simon.lawton@endeavourenergy.com.au.

- Electricity distribution infrastructure on private property over which there is no easement are regarded as protected works under Section 53 'Protection of certain electricity works' of the *Electricity Supply Act 1995* (NSW) and may be managed as if an easement is in place.

Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure', Table 1 'Minimum easement widths' requires a minimum easement width of 9 metres for low voltage up to 22,000 volt / 22 kilovolt (kV) high voltage overhead power lines ie. 4.5 metres to both sides of the centreline of the poles / conductors.

- All encroachments, activities and / or works (including subdivision and even if not part of the Development Application) whether temporary or permanent within or affecting an easement, restriction, right of access or protected works (other than those approved / certified by Endeavour Energy's Customer Network Solutions Branch as part of an enquiry / application for load or asset relocation project) need to be referred to Endeavour Energy's Easements Officers for assessment and possible approval if they meet the minimum safety requirements and controls. However please note that this does not constitute or imply the granting of approval by Endeavour Energy to any or all of the proposed encroachments and / or activities.

For further information please refer to the attached copies of Endeavour Energy's:

- General Restrictions for Overhead Power Lines.
 - General Restrictions for Underground Cables.
 - Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights' which deals with activities / encroachments within easements.
- The Site Plan from Endeavour Energy's G/Net Master Facility Model shows part of the existing 11 kV high voltage overhead power lines on the site as 'Proposed removed' as indicated by the colouring . It is likely that as the proposed development progresses that all the existing electricity distribution infrastructure on the site will become redundant network assets.
- The following advice has been provided regarding whether the available electricity services are adequate for the proposed development facilitated by the Master Plan.
 - Civil Infrastructure Report

8.6. Electrical

8.6.1. Existing Services

BYD and a recent site inspection indicates that there is a high voltage overhead power line (11kV) in Badgerys Creek Road. There are no underground services in Badgerys Creek Road.

Investigations by Estate Power Design (EPD) also identified an existing overhead power line network (11kV) and abandoned underground electrical assets within the site. These will be removed as part of the proposed development.

8.6.2. Proposed Services

It is anticipated that future electrical supply for the proposed development will be serviced by Endeavour Energy's North Bradfield Zone Substation which is currently under construction at the southeast corner of the site.

Endeavour Energy is expected to bring in 2x132kV transmission feeders and distribute 22kV supply throughout the estate from the new zone substation. HV and LV electrical conduits will be reticulated underground throughout the site in anticipation of the zone sub's completion in 2025.

- Draft Infrastructure Delivery Strategy

9 Critical Infrastructure Delivery

There are a number of infrastructure items that are critical to support development of the site. Table 11 identifies this infrastructure and what items will be delivered by the developer/proponent.

Table 11 - Critical Infrastructure

Infrastructure Item	Relevant Contributions Plan	Delivery by the Developer/Proponent	Delivery Timing
Electrical Zone Substation	N/A	No	2025
High-Voltage Electrical Feeders	N/A	Yes	Staged rollout, refer Section 12 for details

- Endeavour Energy's Capacity Planning Branch has provided the following advice.

We have engaged with IPG and their Level 3 Accredited Service Provider (ASP) regarding electricity supply to the proposed Inghams Badgerys Creek Master Plan (IBCMP) with three specific applications to date, one to remove existing overhead assets within the site, one to alter the existing network impacted by the proposed new entrance from Badgerys Creek Road (BCR) and one to supply Stage 1 and Stage 2 with up to 25 megavolt-amperes (MVA) capacity.

In response to the latter application, we have expressed our concerns regarding the limited cable egress opportunity from Endeavour Energy (EE) North Bradfield Zone Substation (ZS) which currently is the easement benefitting EE to BCR then along BCR to the proposed new roundabout entry to Stage 1 & Stage 2.

This concerns EE as the non-establishment of the Eastern Ring Road (ERR) as part of the IBCMP by Inghams is likened to the non-establishment of the Southern Link Road (SLR) as part of the Oakdale South Precinct by Goodmans, where it wasn't built but formed the essential corridor for all the Mamre Road Employment Precinct developer feeders (16 cables in total) and two 132 kilvolt (kV) transmission feeders egressing from South Erskine Park ZS which have been installed and are likely to require partial relocation by TfNSW.

The same is expected to occur here as well particularly for the BCR & ERR intersection realignment directly in front of the North Bradfield ZS. We would like to see this not be repeated or at minimum that the ERR corridor is defined and benched (by IPG) so that electricity infrastructure can be installed ahead of road construction and not need future relocation (by TfNSW).

We look forward to IPG accelerating construction of Road 1, Road 9 and Road 10 and the Metro Link Boulevard in order to provide a more direct easterly egress route for future 22 kV feeders to supply the IBCMP from North Bradfield ZS.

We acknowledge as part of our engagement to date we have advised IPG of the following.

- 1. 132kV North Bradfield ZS is planned to be commissioned and 22 kV switchboard available by 03/2026.*
- 2. 2 x 22kV feeders will be required to the Stage 1 consolidated lots 105,106 and107 for a single large power-use customer with 16 MVA.*
- 3. 2 x 22kV feeders will be required into Stage 2 lots 208, 209, 210 and 211 with 9MVA which would then be extended into further stage.*
- 4. Extension of the EE shared network feeder in BCR will be required into Stage 2 to meet EE's distribution supply security standards.*

5. *Distribution network interconnection from the IBCMP to Victor Avenue is to be re-established and maintained to meet EE's distribution supply security standards.*

We advise that future capacity requirements for the IBCMP will be assessed as each future stage is presented to EE's Customer Network Solutions (CNS) and an appropriate method of supply (MOS) advised. This will include the establishment of additional 22 kV feeders from North Bradfield ZS and a number of cross-feeder ties to meet EE's distribution supply security standards

We have not been furnished with an updated calculated maximum demand load forecast for the IBCMP however based on previous analysis by EE, we expected a total master plan diversified load of 50 MVA excluding any large power-use customer. We would therefore welcome a revised assessment from IPG to assist with EE's forecast planning particularly if more high power-use customers are expected to be drawn into this development.

As a final note we advise that Road 1, Road 9 and Metro Link Boulevard be constructed to suit EE's heavy-load articulated vehicle for delivery of power transformers and other heavy substation equipment to North Bradfield ZS. In the absence of these roads or until they are established, EE requires the equivalent via an alternate access road from BCR or via Stage 1 & Stage 2 which would require Road 1, Road 3, Road 10 and Metro Link Boulevard.

We welcome any further request for information or clarification associated with the electricity supply to the IBCMP.

- To ensure an adequate connection, the applicant will need to engage an Accredited Service Provider (ASP) of an appropriate level and class of accreditation to assess the electricity load and the proposed method of supply for the development.
- An extension or augmentation of the existing electricity distribution network will be required. Whilst there are distribution substations in the area which are likely to have some spare capacity, it is not unlimited and will not be sufficient to provide for the additional load from the proposed development.

Other factors such as the size and rating / load on the conductors and voltage drop (which can affect the quality of supply particularly with long conductor runs) etc. need to be assessed. However the extent of any works required will not be determined until the final load assessment is completed.

- The required padmount substation/s will need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling not located within a public road / reserve) with an appropriate form of property tenure as detailed in the attached copy of Endeavour Energy's 'Land Interest Guidelines for Network Connection'.

Generally it is the Level 3 Accredited Service Provider's (ASP) responsibility (engaged by the developer) to make sure substation location and design complies with Endeavour Energy's standards the suitability of access, safety clearances, fire ratings, flooding etc. If the substation does not comply with Endeavour Energy's standards, the applicant must request a dispensation.

For further information please also refer to the attached copies of Endeavour Energy's:

- Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'.
- Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations.
- Endeavour Energy's network asset design policy is generally to progressively underground all new urban developments. All new cabling / reticulation infrastructure must be of an underground construction type. Where existing overhead construction is present on or in proximity of the site, it may require undergrounding as the development proceeds.
- The minimum required safety clearances and controls for buildings and structures (whether temporary or permanent) and working near overhead power lines must be maintained at all times. If there is any doubt whatsoever regarding the safety clearances to the overhead power lines, the applicant will need to have the safety clearances assessed by a suitably qualified electrical engineer / Accredited Service Provider (ASP).

Even if there is no issue with the safety clearances to the building or structure, consideration must be given to WorkCover (now SafeWork NSW) 'Work Near Overhead Power Lines Code of Practice 2006' eg. ordinary persons must maintain a minimum safe approach distance of 3.0 metres to all voltages up to and including 132,000 volts / 132 kilovolt (kV). It also includes the following requirements for work near low voltage overhead power / service lines.

TABLE 4

Approach distances for work near low voltage overhead service lines

Ordinary Persons (m)				
Hand held tools	Operation of crane or mobile plant	Handling of metal materials (Scaffolding, roofing, guttering, pipes, etc)	Handling of non-conductive materials (Timber, plywood, PVC pipes and guttering, etc)	Driving or operating vehicle
0.5	3.0	4.0	1.5	0.6

- The planting of large / deep rooted trees near electricity infrastructure is opposed by Endeavour Energy. Existing trees which are of low ecological significance in proximity of electricity infrastructure should be removed and if necessary replaced by an alternative smaller planting. The landscape designer will need to ensure any planting near electricity infrastructure achieves Endeavour Energy's vegetation management requirements.

No planting of trees is allowed in the easement for a padmount substation. Screening vegetation around a padmount substation should be planted a minimum distance of 800mm plus half of the mature canopy width from the substation easement and have shallow / non-invasive roots. This is to avoid trees growing over the easement as falling branches may damage the cubicle and tree roots the underground cables. All vegetation is to be maintained in such a manner that it will allow unrestricted access by electrical workers to the substation easement all times.

Endeavour Energy's G/Net master facility model.

The advice provided regarding the extent of the electricity infrastructure on or near the site is based on a desk top review of Endeavour Energy's G/Net master facility model. This is a computer based geographic information system which holds the data on and is used to map the electricity network. The location, extent and type of any electricity infrastructure, boundaries etc. shown on the plan is indicative only. In addition it must be recognised that the electricity network is constantly extended, augmented and modified and there is a delay from the completion and commissioning of these works until their capture in the model. It only shows the Endeavour Energy electricity network and does not show electricity infrastructure belonging to other authorities or customers owned electrical equipment beyond the customer connection point / point of supply to the property.

Easement (or other form of property tenure).

Title searches will confirm the current owners of a property and shows any registered interests affecting the property such as an easement. Not all interests eg. short term leases and licences are registered on the title. Not all easements for electricity infrastructure will necessarily benefit Endeavour Energy eg. there may be interallotment / easements appurtenant to the land particularly for low voltage service conductors / customer connections. For further advice please refer to Endeavour Energy's:

- Land Interest Guidelines for Network Connection Works.
- Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'.

Condition or Advice

With Endeavour Energy's Development Application and Planning Proposal Review process / system the intent of the 'Standard Conditions' being indicated as either a 'Condition' or 'Advice' essentially depends on the risk associated with the matter. If the matter is one that is likely or very likely to be an issue / needed to be addressed by the applicant and may require corrective action, then it is marked as a 'Condition'. If the matter is less likely and the consequences of the applicant not addressing it are lower or can be readily rectified, then it is marked as 'Advice'. If the matter is considered to be not applicable / relevant then it is not marked as either.

For example, the obtaining advice from the Before You Dig service in accordance with the requirements of the *Electricity Supply Act 1995* (NSW) and associated Regulations is a standard / regulatory requirement and will be generally indicated as 'Condition'. If the Site Plan from Endeavour Energy's G/Net Master Facility Model indicates there is no underground electricity infrastructure it will be indicated as 'Advice' as a precaution and in regard to any other underground utilities.

Not all of the matters may be directly or immediately relevant or significant to the Development Application or Planning Proposal. However, Endeavour Energy's preference is to alert proponents / applicants of the potential matters that may arise should development within closer proximity of the existing and/or required electricity infrastructure needed to facilitate the proposed development on or in the vicinity of the site occur. Even if a matter is not indicated a 'Condition' or 'Advice', applicants are encouraged to review all of the 'Standard Conditions' as some matters may not have been evident from the information provided with the Development Application and of which the applicant may have additional knowledge.

Decision

In the NSW Planning Portal for the 'Agency response', as Endeavour Energy is not a concurring authority under the provision of the *Environmental Planning and Assessment Act 1979* (NSW), it does not 'Approve' or 'Refuse' a Development Application in the Portal. It will 'Approve (with conditions)' (which may 'Object' in the submission and detail the matters requiring resolution), or if all the matters in the submission are marked as for 'Advice', the outcome of the assessment will also be 'Advice'.

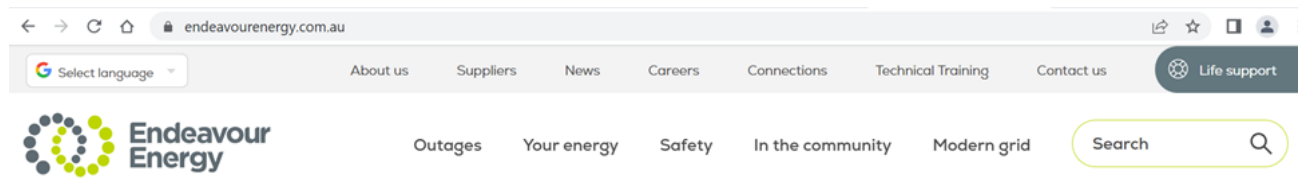
Objection

Endeavour Energy may object to a Development Application if the conditions may substantially impact the proposed development or regarded as a significant risk to the electricity distribution network. Although Council may be able to appropriately condition these matters, Endeavour Energy's recommendation is to address the matters prior to Council granting any consent. This can assist in avoiding the need to later seek modification of an approved Development Application.

Please note Endeavour Energy can only assess the Development Application based on the information provided by the applicant and Council. Due to time and resource constraints it is not possible to refer all development application notifications to the relevant internal stakeholders for review and advice or to request additional information from the applicant or Council. Applicants should be providing proper detailed plans of the electricity infrastructure / easements on or near the site and address the potential impacts of the proposed development thereon in the Statement of Environmental Effects. The provision of inadequate detail may result in Endeavour Energy objecting to the Development Application.

Further Advice

The 'Standard Conditions' include additional advice and contact details and further information is also available on Endeavour Energy's website at <https://www.endeavourenergy.com.au/> .



To resolve any objection or to seek further advice the following are the main contacts and can be reached by calling Endeavour Energy via Head Office enquiries on business days from 9am - 4:30pm on telephone: 133 718. For other matters the contact details are included in Endeavour Energy's standard conditions for Development Application and Planning Proposal Review. Whilst the Environmental Services Team are able to provide general advice, the resolution / approval of any matter/s rests with the relevant contact related to the matter/s.

Branch / Section	Matters	Email
Customer Network Solutions	Electricity supply or asset relocation who are responsible for managing the conditions of supply with the applicant and their Accredited Service Provider (ASP).	CWAdmin@endeavourenergy.com.au
Easements Officers	Easement management or protected works / assets.	Easements@endeavourenergy.com.au
Property	Property tenure eg. the creation or release of easements.	network_property@endeavourenergy.com.au
Field Operations (to the relevant Field Service Centre).	Safety advice for building or working near electrical assets in public areas (including zone and transmission substations).	Construction.Works@endeavourenergy.com.au

Please note Endeavour Energy's above contacts do not have access to the NSW Planning Portal. To resolve any matters direct contact should be made with the responsible contact. This will avoid double handling and possible delays in responding to the applicant / Council.

Accredited Service Providers

The Accredited Service Provider (ASP) scheme accredits organisations to perform contestable work on the NSW electricity distribution network. Contestable works are works that are required for the electricity distribution network provider to supply the load in the power lines where a new or altered connection is being requested.

Endeavour Energy is urging applicants / customers to engage with an ASP prior to finalising plans to in order to assess and incorporate any required electricity infrastructure as well as addressing safety issues such as safety clearances. In so doing the consideration can also be given to its impact on the other aspects of the proposed development. This can assist in avoiding the making of amendments to the plan or possibly the need to later seek modification of an approved development application.

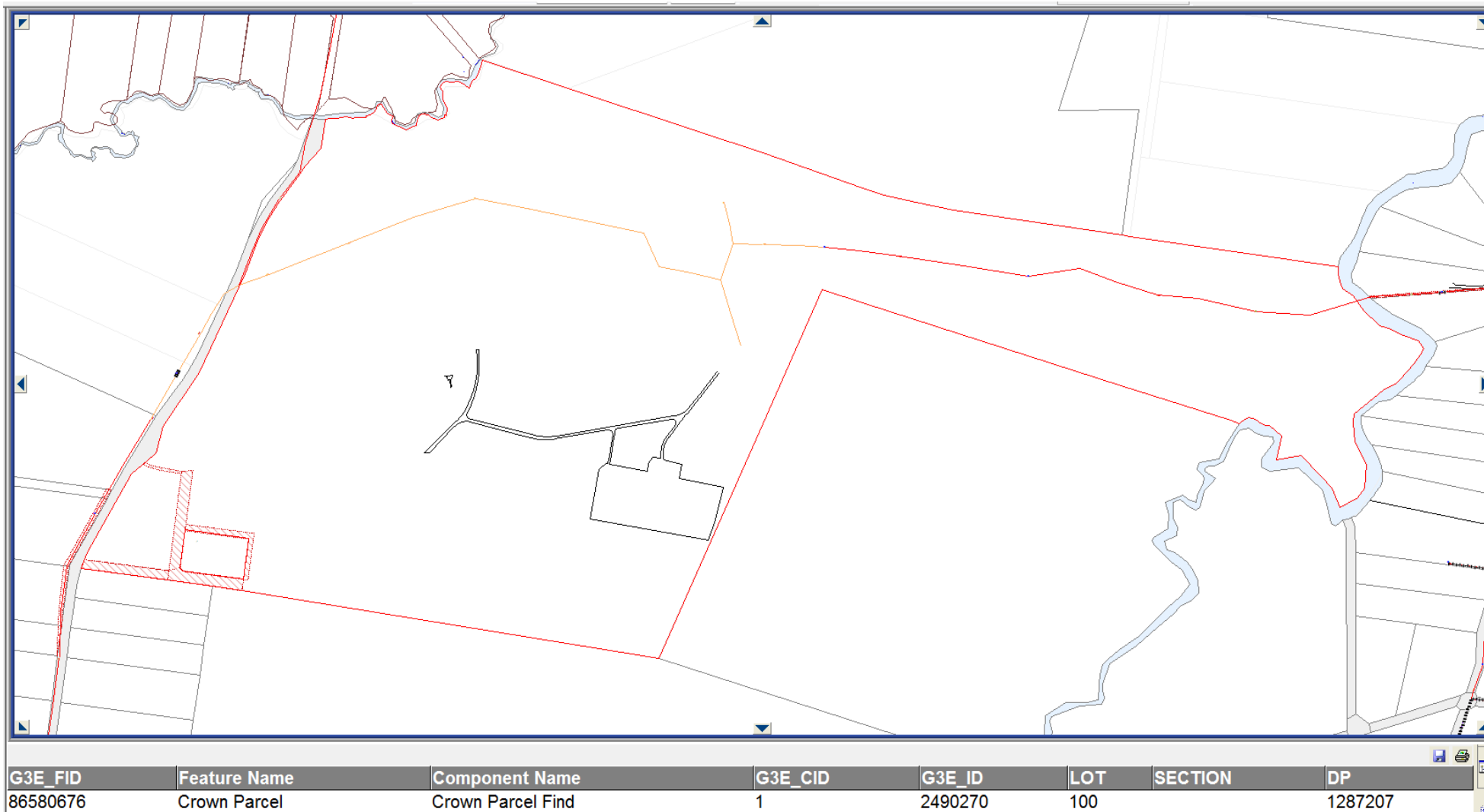
Details of the ASP Scheme which accredits organisations to perform contestable work on the NSW electricity distribution network are available via the following link to the Energy NSW website at <https://www.energysaver.nsw.gov.au/get-energy-smart/dealing-energy-providers/installing-or-altering-your-electricity-service> .

Duty of Care

All individuals have a duty of care they must observe when working in the vicinity of electricity infrastructure. Before you do anything:

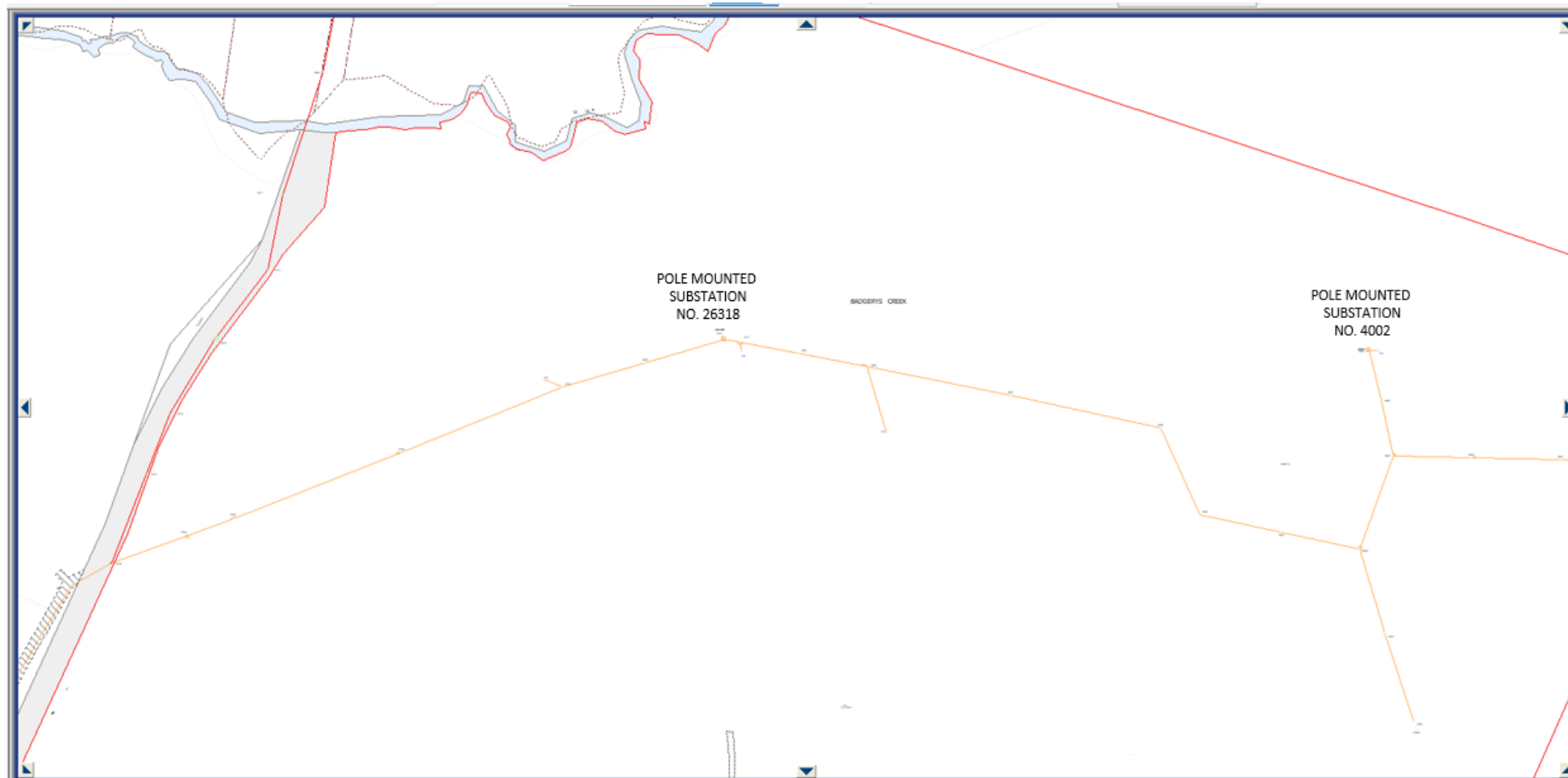
- 1) Contact Before You Dig and Look Up and Live to obtain the details of the electricity infrastructure on or near the site noting they are a guide only to what might be in the area and may not be entirely accurate.
- 2) Comply with the conditions and consider the advice provided above.
- 3) If needed contact Endeavour Energy on 133 718 or the contacts provided above for assistance.
- 4) **DO NOT** attempt any work near electricity infrastructure until all required approvals and safety measures are in place.
- 5) Proceed only if you have satisfied yourself it is safe.
- 6) Always remember, even the briefest contact with electricity at any voltage can have serious consequences to a person's health and safety and can be fatal.

Site Plan from Endeavour Energy's G/Net Master Facility Model

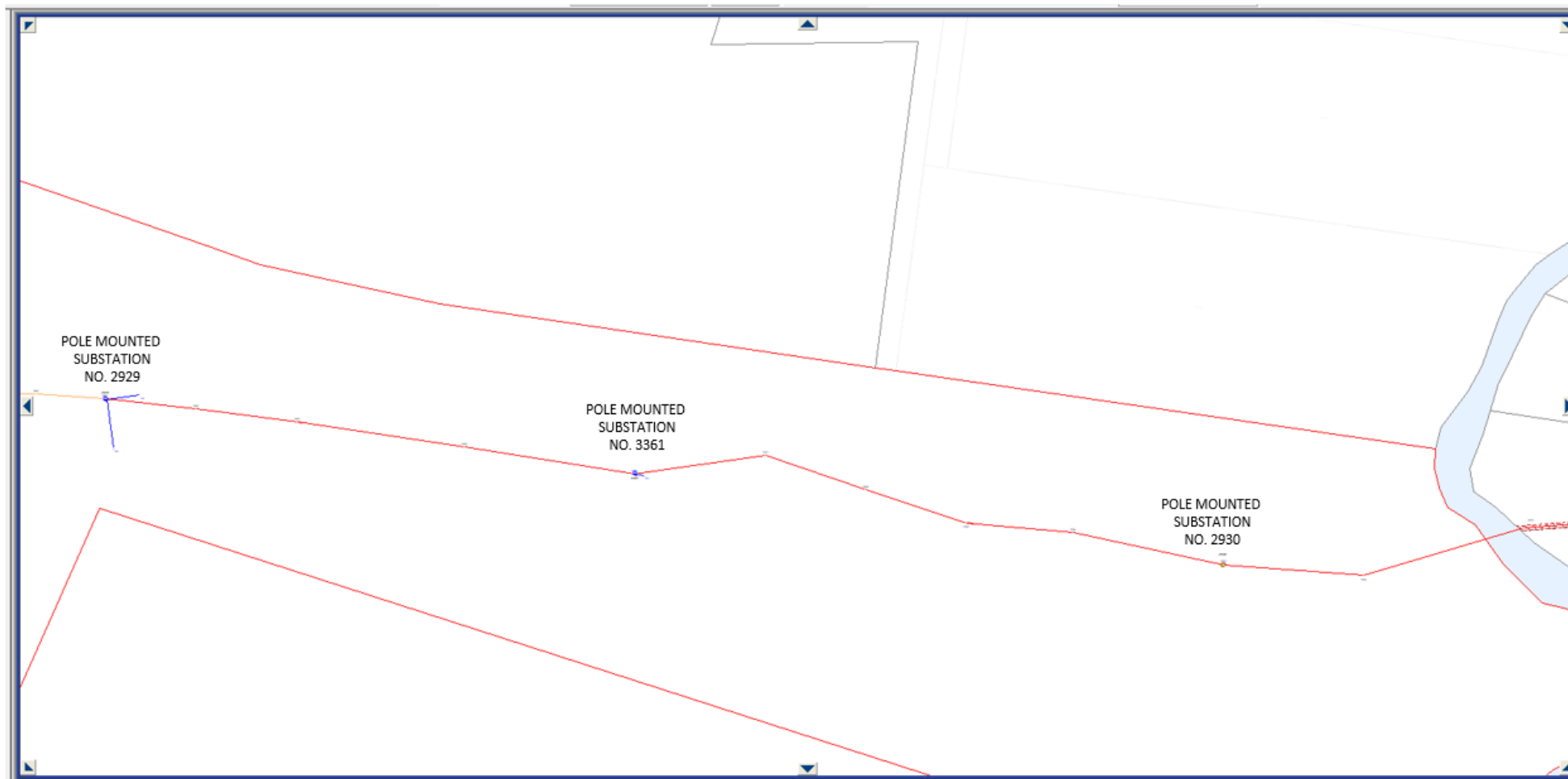


Please note the location, extent and type of any electricity infrastructure, boundaries etc. shown on the plan is indicative only. In addition it must be recognised that the electricity network is constantly extended, augmented and modified and there is a delay from the completion and commissioning of these works until their capture in the model. Easements benefitting Endeavour Energy are indicated by red hatching. Generally (depending on the scale and/or features selected), low voltage (normally not exceeding 1,000 volts) is indicated by blue lines and high voltage (normally exceeding 1,000 volts but for Endeavour Energy's network not exceeding 132,000 volts / 132 kV) by red lines (these lines can appear as solid or dashed and where there are multiple lines / cables only the higher voltage may be shown). This plan only shows the Endeavour Energy network and does not show electricity infrastructure belonging to other authorities or customers owned electrical equipment beyond the customer connection point / point of supply to the property. This plan does not constitute the provision of information on underground electricity power lines by network operators under Part 5E 'Protection of underground electricity power lines' of the *Electricity Supply Act 1995* (NSW).

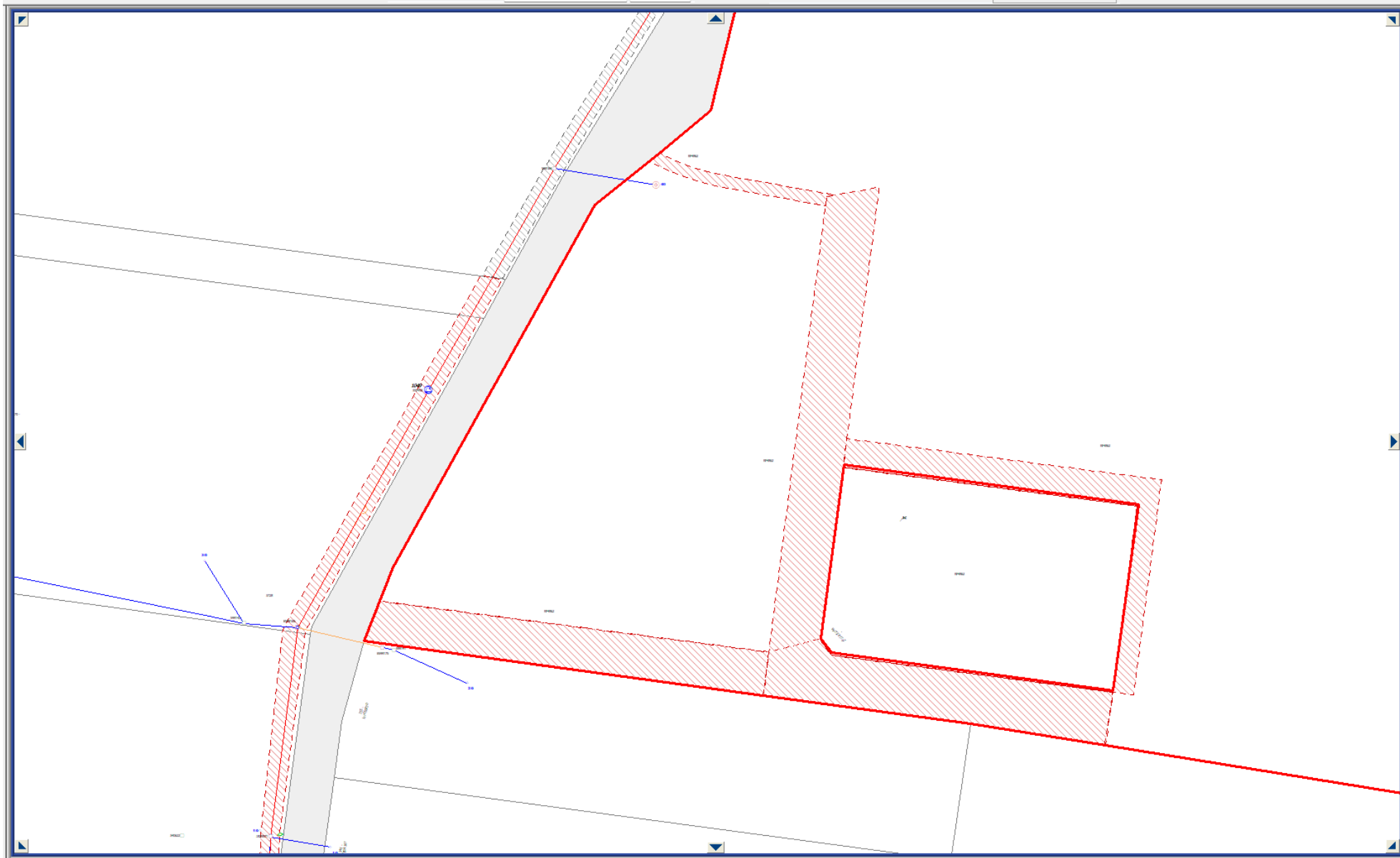
Site Plan from Endeavour Energy's G/Net Master Facility Model




























Site Plan from Endeavour Energy's G/Net Master Facility Model



Site Plan from Endeavour Energy's G/Net Master Facility Model



LEGEND	
	Padmount substation
	Indoor substation
	Ground substation
	Kiosk substation
	Cottage substation
	Pole mounted substation
	High voltage customer substation
	Metering unit
	Switch station
	Indoor switch station
	Voltage regulator
	Customer connection point
	Low voltage pillar
	Streetlight column
	Life support customer
	Tower
	Pole
	Pole with streetlight
	Customer owned / private pole
	Cable pit
	Load break switch
	Recloser
	Proposed removed
	Easement
	Subject site

Extract of Deposited Plan DP 1287207

PLAN FORM 2 (A2)

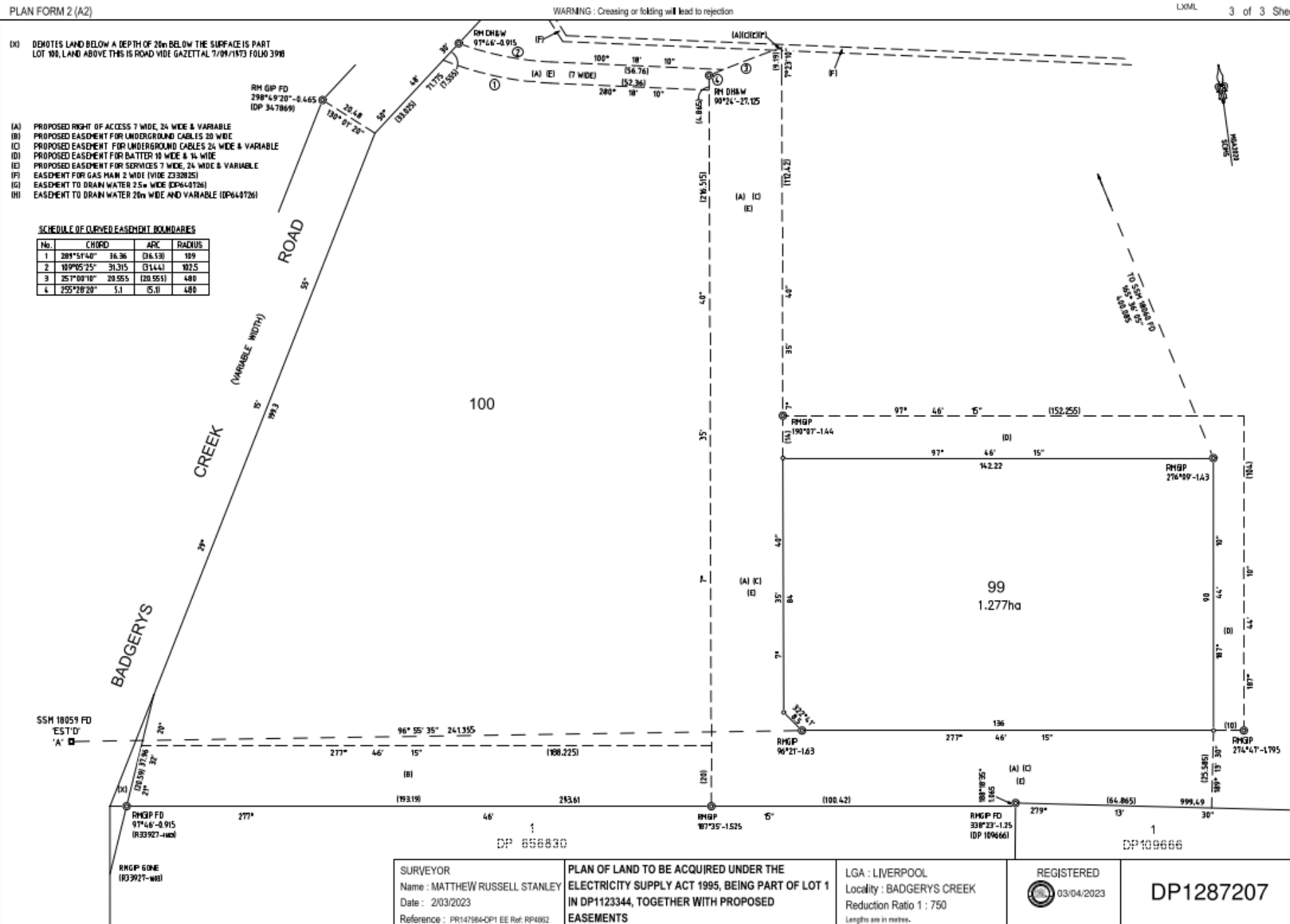
LXML 3 of 3 Sheets

(IX) DENOTES LAND BELOW A DEPTH OF 20m BELOW THE SURFACE IS PART LOT 100, LAND ABOVE THIS IS ROAD VIDE GAZETAL 7/09/1973 FOLIO 398

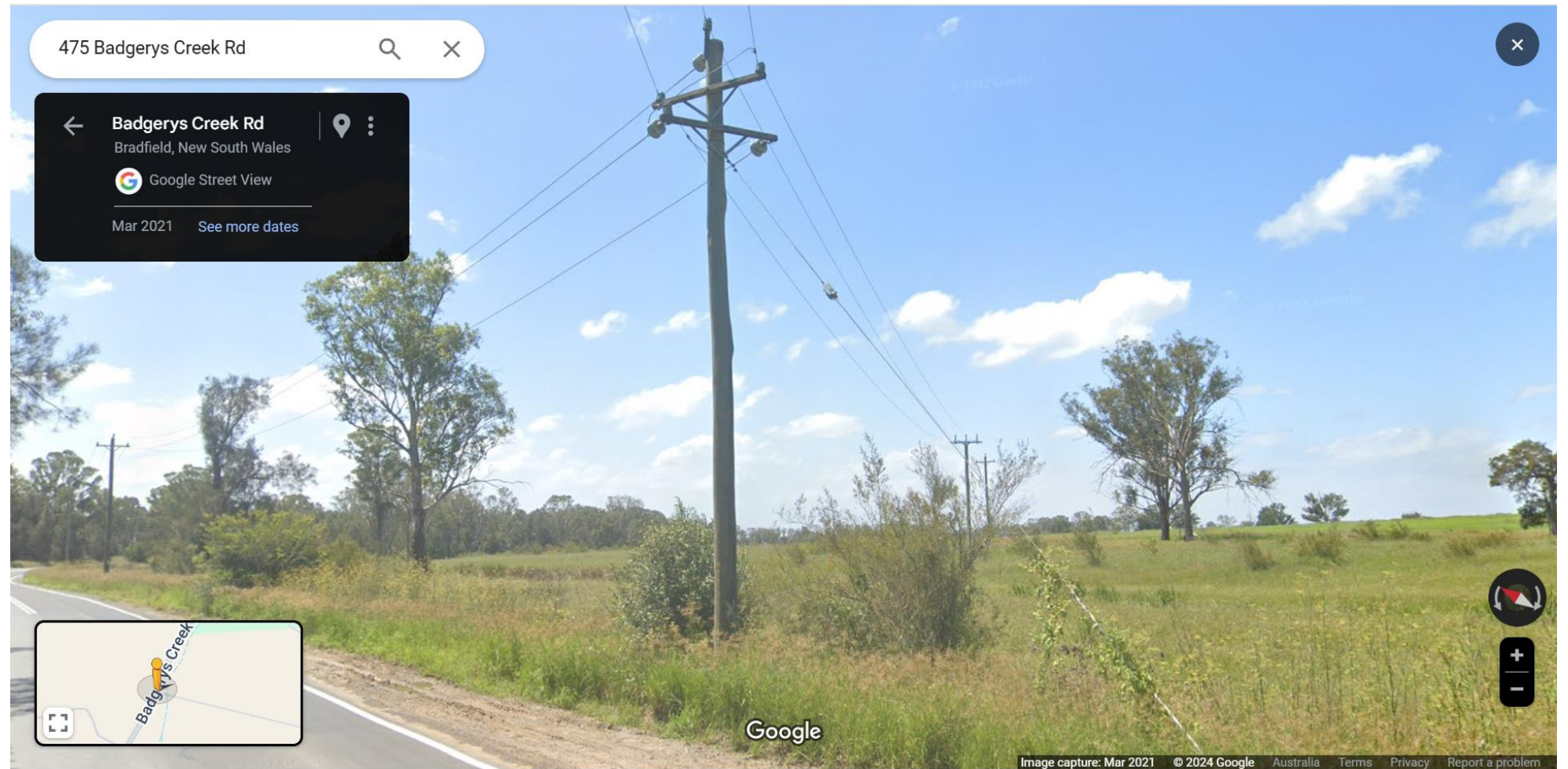
- (A) PROPOSED RIGHT OF ACCESS 7 WIDE, 24 WIDE & VARIABLE
- (B) PROPOSED EASEMENT FOR UNDERGROUND CABLES 20 WIDE
- (C) PROPOSED EASEMENT FOR UNDERGROUND CABLES 24 WIDE & VARIABLE
- (D) PROPOSED EASEMENT FOR BATTER 10 WIDE & 14 WIDE
- (E) PROPOSED EASEMENT FOR SERVICES 7 WIDE & 14 WIDE
- (F) EASEMENT FOR GAS MAIN 2 WIDE (VIDE 2330825)
- (G) EASEMENT TO DRAIN WATER 25m WIDE (DP640726)
- (H) EASEMENT TO DRAIN WATER 20m WIDE AND VARIABLE (DP640726)

SCHEDULE OF CURVED EASEMENT BOUNDARIES

No.	CHORD	ARC	RADIUS
1	289°51'40"	36.36	(36.13)
2	109°05'25"	31.315	(31.44)
3	257°00'10"	20.555	(20.55)
4	255°28'20"	5.1	(5.1)



Google Maps Street View



Google Maps Street View

