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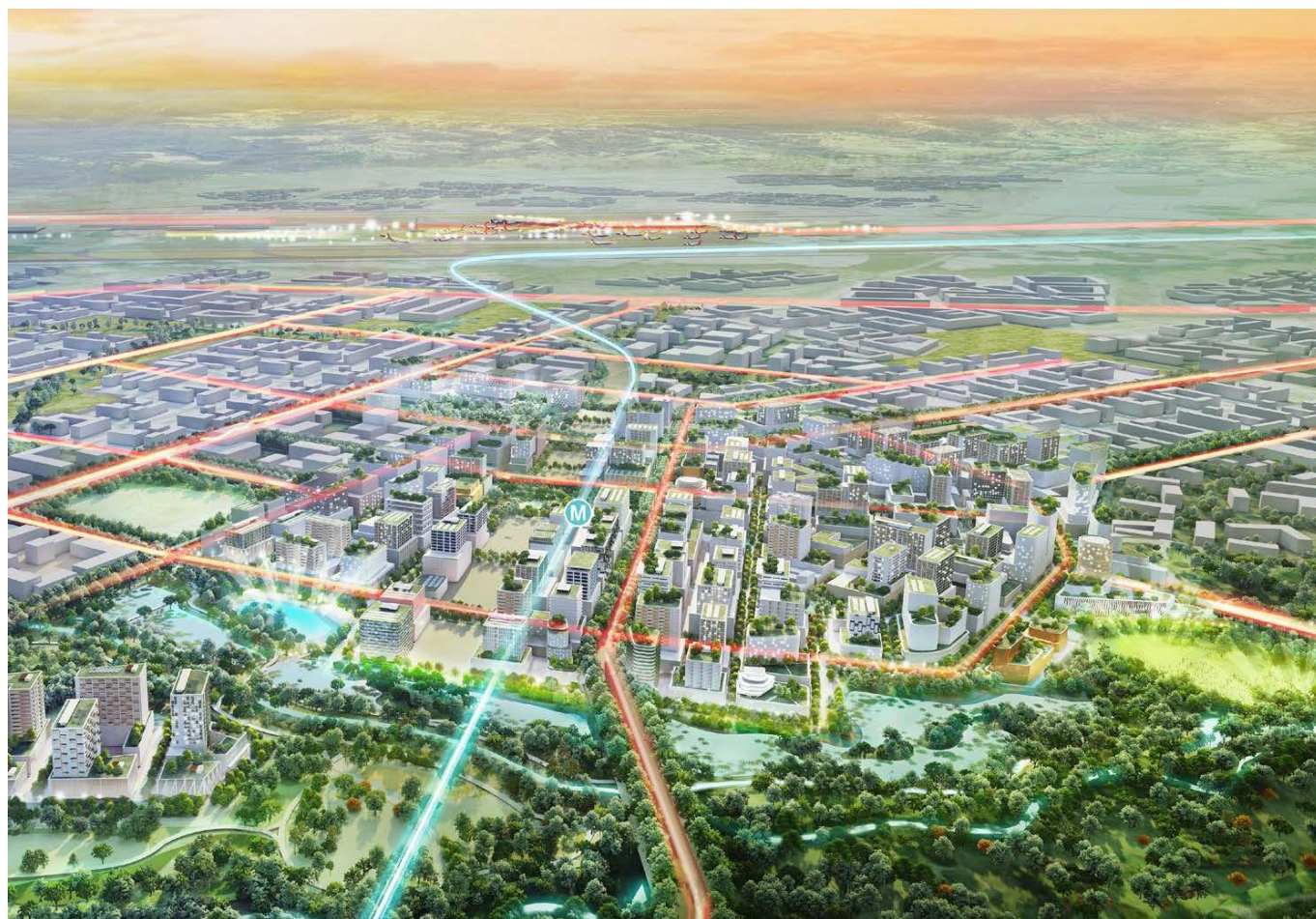
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Bradfield City Centre Master Plan

Western Sydney Aerotropolis Master Plan Assessment Report (WSA_MP02)

July 2024





Acknowledgement of Country

The Department of Planning, Housing and Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and 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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Bradfield City Centre Master Plan (WSA_MP02) Assessment Report

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Preface

This assessment report provides a record of the Department of Planning, Housing and Infrastructure's (the Department) assessment and evaluation of the Western Sydney Aerotropolis Master Plan application for the Bradfield City Centre lodged by the Bradfield Development Authority (BDA), formerly known as the Western Parkland City Authority (the proponent). The report includes:

- An explanation of why permission was granted to prepare the Master Plan and who the approval authority is
- An assessment of the Master Plan against government policy and statutory requirements
- A demonstration of how matters raised by the community and other stakeholders have been considered
- An explanation of any changes made to the Master Plan during the assessment process
- An evaluation of the Master Plan components, having regard to the matters for consideration under *State Environmental Planning Policy (Precincts - Western Parkland City) 2021* (Western Parkland City SEPP), and provides a view on whether the master plan is acceptable on balance.
- A recommendation to the decision-maker, along with the reasons for the recommendation, to assist them in making an informed decision about whether the Master Plan should be approved.

Executive Summary

This report details the Department's assessment of the Western Sydney Aerotropolis Master Plan application for the Bradfield City Centre (WSA_MP02) (the Master Plan).

This report will be provided to the Minister for Planning and Public Spaces (the Minister) for consideration when deciding whether to grant approval to the Master Plan.

Master Plan

The proponent lodged a Master Plan application seeking approval for a new mixed-use city centre, comprising a range of commercial, employment, entertainment and residential uses and open space centred around a new Sydney Metro station. The Master Plan is located at 215 Badgerys Creek Road, Bradfield, being Lot 3101 DP 1282964 within the Liverpool local government area (LGA).

The Bradfield City Centre Master Plan establishes an urban structure and framework to deliver the vision and objectives for the city centre within the Aerotropolis.

The Bradfield Master Plan comprises:

- A vision and objectives for the city centre
- Designing with Country values and built-form principles
- Design Excellence Strategy
- Complying development provisions
- Site-specific development controls to define the city structure and guide land use and built form, movement networks, public domain and open space, and social and cultural infrastructure requirements.

The Master Plan application also includes proposed amendments to the Aerotropolis planning framework to facilitate and reflect the Master Plan design, including:

- Amendments to the Land Reservation Acquisition Map within the Western Parkland City SEPP
- Amendments to the Precinct Plan, and
- Variations to the DCP controls.

The Master Plan application is supported by a range of technical documents and strategies. It adopts certain strategies by reference, including the Art and Cultural Strategy and Social Infrastructure Strategy (part of the Master Plan application documentation), as well as a Travel Demand Strategy, Public Domain Strategy, and Access and Servicing Strategy.

The Master Plan has an Estimated Development Cost (EDC) of \$11.6 billion and is expected to generate between 20,000 and 24,000 jobs by the year 2056. The Bradfield City Centre (city centre) is projected to have the capability to deliver approximately 2.3 million square metres of Gross Floor Area close to public transport services. It is envisioned that knowledge-intensive industries within the Aerotropolis will be concentrated in the city Centre and will account for approximately 36% of the total Aerotropolis workforce.

The Master Plan can provide a mix of higher-density housing types for up to 10,000 new dwellings. Within the master plan area, a range of education, community, cultural and civic spaces are planned for, including new public primary and high schools as well as over twenty hectares of open space, a swimming area, a major events space, a centrally located park fronting the new Bradfield Metro Station and connections to Moore Gully and Thompsons Creek.

No building or construction works are proposed to be undertaken as part of the Master Plan. All future development would be subject to separate planning applications.

Technical Assurance Panel

As required by the Department's Western Sydney Aerotropolis Master Plan Guidelines (the Guidelines), the Master Plan was subject to a co-design pre-lodgement process between the proponent, key State agencies, Councils and an independent urban designer. This Technical Assurance Panel (TAP) process was led by an independent chair who guided the Master Plan through a number of iterations until the final design was endorsed by the TAP as suitable for lodgement with the Department, subject to conditions.

Strategic context

The Western Sydney Aerotropolis Plan (WSAP) sets the planning framework for the Western Sydney Aerotropolis. It sets the Aerotropolis-shaping vision, structure plan, planning objectives and principles for development, aligning with the regional plan and district plan, and informing precinct plans and master plans. It envisions an Aerotropolis that accommodates high-value jobs closer to where people live, as well as an accessible, innovative 24-hour metropolitan centre, connected globally, nationally, locally, and digitally.

The Department considers the Master Plan to be consistent with the WSAP vision and its planning principles of productivity, sustainability, infrastructure and collaboration, and liveability.

Statutory context

The Master Plan is enabled by Chapter 4 of the Western Parkland City SEPP. Section 4.41 includes an optional master planning process for large or strategic sites within the Western Sydney Aerotropolis, providing landowners with the opportunity to access an alternative development

approval pathway for site-specific planning controls and unlocking complying development pathways for future development.

Part 4.7 of the Western Parkland City SEPP sets out provisions for preparing, approving and amending master plans and precinct plans. Under Sections 4.41 and 4.38, the Minister for Planning and Public Spaces is the approval authority for both the Master Plan and Precinct Plan amendment pathways.

The Department has assessed the Master Plan against the Aerotropolis planning framework, including:

- Western Sydney Aerotropolis Plan (WSAP)
- Western Parkland City SEPP
- Western Sydney Aerotropolis Precinct Plan (Precinct Plan)
- Western Sydney Aerotropolis Master Plan Guidelines (Master Plan Guidelines), and
- Western Sydney Aerotropolis Development Control Plan (DCP).

The Department considers that the master plan is generally consistent with the various aims, visions, and objectives of these documents, further detail is set out in **Section 6** and **Appendix D - F**.

Engagement

The Department exhibited the Master Plan application, including the Master Plan and supporting documents, proposed SEPP amendment and the Precinct Plan and DCP Amendment Discussion Paper, between 5 February and 4 March 2024.

During the exhibition period, the Department received:

- 63 public submissions (9 from special interest groups and 54 from individuals). Of these, 40 were objections, 9 supported the proposal and 14 were comments.
- 3 Council submissions from Liverpool City Council, Penrith City Council and Wollondilly Council as well as a submission from The Parks NSW – Sydney’s Parkland Councils providing comments.
- 15 State agency submissions providing advice or comments.

Key issues raised in public submissions include:

- Privacy concerns related to the Smart Cities vision
- Support for increased public transport
- Prioritisation of planning for Bradfield City Centre over planning for Luddenham Village
- Concerns about the lack of affordable housing targets, and
- Potential impacts on neighbouring properties.

The Master Plan is located within the Liverpool LGA. Liverpool City Council did not object to the proposal but requested further consideration of a range of issues, including the funding, design, delivery, and maintenance of infrastructure.

The proponent submitted a Response to Submissions (RtS) report to address the issues raised in submissions and agency advice. As a result, post-exhibition changes were made to the Master Plan by the proponent to address the issues raised.

The Department is satisfied that all issues raised in submissions have been considered.

Assessment

Key considerations

The Department has considered the proposed Master Plan in accordance with Section 4.41 of the Western Parkland City SEPP, which sets out provisions in relation to preparing, approving and amending master plans. The Department is satisfied that the proposed Master Plan has addressed and is consistent with the provisions of the Western Parkland City SEPP.

The proposed amendments to the existing figures in the Precinct Plan have been considered in the Department's assessment of the Master Plan. The proponent worked with the Department and key agencies to clearly articulate and justify the proposed amendments to the existing figures. The Department is satisfied that the proposed amendments to the Precinct Plan are consistent with objectives of the Precinct Plan.

The proposed Master Plan has been prepared in accordance with the Master Plan Requirements, set out in the Master Plan Guidelines. The Department considers the master Plan has been prepared in accordance with the Master Plan Guidelines and is satisfied that the appropriate steps have been followed in its preparation.

The Department has considered the proposed site-specific development controls and alternative benchmark solutions for Bradfield City Centre and is satisfied that they are consistent with both the objectives and performance outcomes of the DCP.

The issues raised in the submissions from the community, interest groups, councils and government agencies have been considered by the proponent in its proposal. In its RtS, the proponent addressed the issues raised and proposed post-exhibition changes to:

- The Master Plan layout
- Additional site-specific development controls for:
 - Affordable housing
 - Wind impact
 - Open space and public domain

- Public art
- Flood management
- Road network design and travel demand
- Removal of proposed exempt development provisions
- Improvements to the design excellence strategy, in line with feedback from the NSW Government Architect; and
- Correcting errors and omissions to the proposed Precinct Plan amendments

The Department accepted the proponent's RtS and post-exhibition changes, which has informed its assessment of key issues. The Department is satisfied that the issues raised have been adequately considered and addressed, which are reflected in the changes proposed by the proponent in the amended Master Plan.

Key assessment issues

The key assessment issues for the Master Plan are design excellence, flood management and risk, affordable housing, complying development, Precinct Plan amendments, variations to DCP controls and Western Parkland City SEPP amendments.

Design excellence

The proponent worked with the NSW Government Architect to refine the exhibited Design Excellence Strategy. The Department is satisfied that the proposed strategy meets the requirements of the Western Parkland City SEPP and will enable the assessment of design excellence within the city centre.

Flood Management and Risk

The proponent's amended Flood Impact and Risk Assessment (FIRA) submitted with the RtS found that the development lots proposed north of Moore Gully had low levels of flood risk during the Probable Maximum Flood (PMF) event which could be mitigated through the provision of a conventional pit and pipe stormwater system within the roadways of the city centre. In contrast, the FIRA found that some development lots south of Moore Gully would be subject to high-hazard riverine flows during the PMF event. The FIRA recommended mitigation measures including that emergency evacuation procedures be developed in line with SES guidance, and that the siting and design of future development lots south of Moore Gully be subject to further detailed design to reduce exposure of buildings and the community to dangerous flood impacts.

The Department raised concerns about the flood risk during a PMF event to the future community within the south of the site and, at the Department's request the proponent added a notation to the Master Plan indicating that: *'Land to the south of Moore Gully requires further investigation and*

detailed design to mitigate flood impact and risk prior to submission of any development application for that land. The proponent also amended the master plan to include a development control stating that *'no ground floor residential permitted in areas impacted by the PMF'*.

The Department's assessment concludes that the Master Plan is acceptable as future development would be designed to address flooding impact and risks. The Department is satisfied that the flooding risks associated with land south of Moore Gully can be mitigated through further investigation and design, which has been recognised in the amended Master Plan.

Affordable housing

The proponent has committed that a proportion of residential dwellings developed on the site will be affordable housing, in accordance with NSW Government Policy. Submissions requested clear targets be set for affordable housing.

In its response to submissions report, the proponent notes its approach enables flexibility to deliver a percentage of affordable housing contemporary to Government policy at the time, which may change and evolve over the period through which the City Centre is delivered. Bradfield is publicly owned land and will be strategically divested and utilised to drive Government's policy outcomes, including affordable housing. The first 'Superlot' (a 4.8ha site within the city centre) land release was put to the market by the proponent for an Expression of Interest (EOI) in April 2024 requiring a minimum 1,000 homes with 30% affordable housing.

However, the Department is concerned that the proposed approach does not provide sufficient certainty for an adequate supply of affordable housing over the life of the project. Therefore, a condition of approval is recommended that requires the Master Plan to be updated to specify residential development shall include an affordable housing rate no less than 10% or in line with the current Government policy, whichever is the greater. This will ensure the Master Plan promotes the adequate provision for affordable housing in the city centre and contributes to projected affordable housing demand in the Liverpool LGA. This approach is consistent with other planning policy initiatives to boost affordable housing in accessible areas.

Complying development

The proponent worked with the Department to refine the exhibited Complying Development Code. The Department is satisfied that the proposed complying development provisions are consistent with the requirements of the Western Parkland City SEPP and provide an additional and streamlined planning pathway for change of use development.

Precinct Plan amendments

The proponent proposed amendments to several of the figures in the Precinct Plan including:

- Street hierarchy

- Land use and structure
- Blue-Green infrastructure framework
- Total water cycle management
- Transport network
- Active transport network
- Design competitions

The proposed amendments were supported by the TAP. Refinements to the exhibited proposed amendments were made as a result of submissions and feedback from State agencies. The amendments intend to align the figures with the Master Plan's refinements to the street hierarchy, land use types, placement of stormwater infrastructure and inclusion of Central Park. As part of its RtS, the proponent revised several of its amended figures to address impacts to neighbouring lots and correct errors and omissions.

The Department's assessment concludes that the proposed amendments are consistent with the objectives and requirements of the Precinct Plan, would result in an improved planning outcome and recommends that the Precinct Plan be amended as proposed.

Variations to DCP controls

The Master Plan includes controls to guide land use and built form (e.g height of buildings, floor space distribution, street setbacks), general development controls (e.g canopy cover and deep soils, water sensitive urban design, public art), street network and design, conceptual designs for public domain and open space and recommendations for social and cultural infrastructure.

The proposed DCP alternative solutions and additional controls were supported by the TAP. In response to submissions made during the exhibition, refinements were made to proposed controls and several additional controls were proposed to strengthen requirements in relation to wind impact, affordable housing (as outlined above) and transport. The proponent proposes several alternative benchmark solutions to performance outcomes in the DCP including controls for naturalised drainage, perviousness, tree canopy and deep soil, building setbacks, solar access to open space, maximum gross footprint and road design. The Department's assessment found that the proposed variations would provide site-specific guidance appropriate for the city centre and are consistent with the relevant objectives and performance outcomes of the DCP.

Western Parkland City SEPP amendment

The proponent has proposed amending the Western Parkland City SEPP Land Reservation Acquisition Map to reflect the proposed locations of open space and stormwater management infrastructure and regional park as set out in the Master Plan.

Following exhibition and advice from the Department, the proponent decided not to pursue proposed Western Parkland City SEPP amendments to exempt development provisions. A map only amendment to the Land Reservation Acquisition Map is now proposed to reflect the Master Plan design and layout of the City Centre.

The Department's assessment found that the amendment to the Land Reservation Acquisition Map is necessary to implement the Master Plan, reflects an improved layout for stormwater infrastructure and increases the Ridge Park open space.

Conclusion

Overall, the Department's assessment concludes the Bradfield City Centre Master Plan is acceptable as it has demonstrated consistency with the Aerotropolis planning framework, including the:

- Western Sydney Aerotropolis Plan
- Western Parkland City SEPP
- Precinct Plan
- Master Plan Guidelines and Requirements, and
- DCP

The Department is satisfied that the issues raised by State agencies, Councils and the community have been adequately addressed by the proponent in the RtS, the Department's assessment report and the amended Master Plan, subject to the recommended condition.

The Department considers the Master Plan to be consistent with the Aerotropolis planning framework, has satisfied that statutory requirements for approval have been satisfied, community and agency views have been considered, key assessment issues have been resolved and the Master Plan establishes a superior planning outcome for the city centre.

The Department concludes that the Master Plan is acceptable as future development would be designed to minimise impacts and mitigate risks. The Department considers that, if approved, the Master Plan will enable a new city centre for the Aerotropolis, largely within 400m of the Bradfield Metro station, that will exhibit design excellence, ensure the adequate provision of affordable housing and provide active and sustainable city spaces.

The design of the Master Plan has been informed by Connecting with Country principles and ongoing Aboriginal engagement and has taken a landscape-led approach, providing over 30 ha of new green space that connects along Thompsons Creek to the wider Aerotropolis.

The Bradfield City Centre Master Plan is a key component in achieving the vision of the Western Sydney Aerotropolis Plan to create an accessible, innovative and connected city with great places as it will have the capacity to:

- Deliver up to 10,000 residential apartments
- Generate up to 24,000 jobs by 2056
- Supply 2,316,000 sqm GFA within its Mixed Use Zone, and
- Provide 38.5 hectares of open space

As such, the Department considers that the project is in the public interest and is recommended for approval.

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1 Introduction

1.1. Master Plan

The Bradfield Development Authority (BDA) (the proponent) is seeking master plan approval for a mixed-use city centre, comprising commercial, light industrial, open space and residential uses for its 114.6-hectare site at Bradfield, centred around a new Sydney Metro station.

Section 4.41 of the Western Parkland City SEPP includes an optional master planning process for large or strategic sites within the Western Sydney Aerotropolis, providing landowners with the opportunity to access an alternative approval pathway for site-specific planning controls and unlocking complying development pathways for future development.

The draft Bradfield City Centre Master Plan (Master Plan) will complement the Western Sydney Aerotropolis Development Control Plan (DCP) by providing additional fine-grain planning controls for the city centre that will facilitate future planning and design of key buildings, street layouts and open space. The Master Plan will also allow change of use within approved buildings to be carried out as complying development, enabling uses to adapt as the City Centre grows.

An overview of the Master Plan (as amended) is provided in **Section 2**.

A summary of the key post-exhibition changes made to the Master Plan since it was initially lodged with the Department is provided in **Section 5**.

1.2. Location

The Master Plan site is situated within the Western Sydney Aerotropolis, to the south of the Western Sydney International (Nancy-Bird Walton) Airport at the intersection of Badgerys Creek Road and The Northern Road.

The site is irregular in shape and covers an area of 114.6 hectares, spanning across the Aerotropolis Core and Wianamatta-South Creek Precincts, with road access to Badgerys Creek Road located at the north-western corner.

The site is located at 215 Badgerys Creek Road, Bradfield (Lot 3101 DP 1282964) within the Liverpool Local Government Area. The site is positioned 22 kilometres from Liverpool CBD, 28.5 kilometres from Penrith CBD and 25 kilometres from Campbelltown CBD.

The site will be serviced by the Sydney Metro Western Sydney Airport line, which runs from the key centre of St Marys to the Bradfield City Centre. The Metro line traverses through Orchard Hills, Luddenham, the Airport Business Park and Airport Terminal as shown in **Figure 1**.

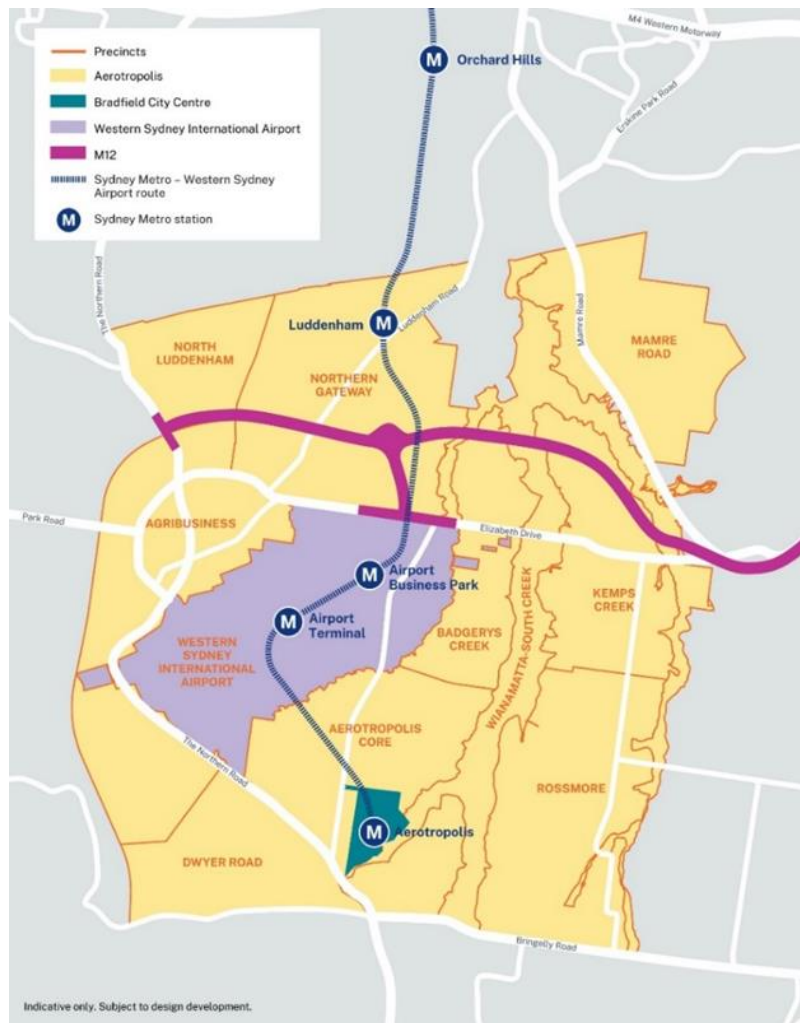


Figure 1 | Regional context map (Source: Western Parkland City Authority, 2023)

The site consists entirely of rural land that has been largely cleared of vegetation. Parts of the site still contain established trees, low lying shrubs and native vegetation. The site was previously used by the Royal Australian Air Force as a radio receiving station with several structures relating to this historical use still present.

The site is adjoined by Thompsons Creek which traverses along the south-eastern boundary of the site. Moore Gully traverses through the site from the western boundary and connects with Thompsons Creek to the east. The site slopes gently from the highest point in the north-west down to Moore Gully and Thompsons Creek in the south with a total fall of 25m creating approximately a 1:40 gradient (see Figure 2).

Large rural residential lots predominantly surround the site with the most prominent being 'Kelvin', a colonial Georgian single-storey cottage located approximately 100 metres to the north-eastern boundary of the site.

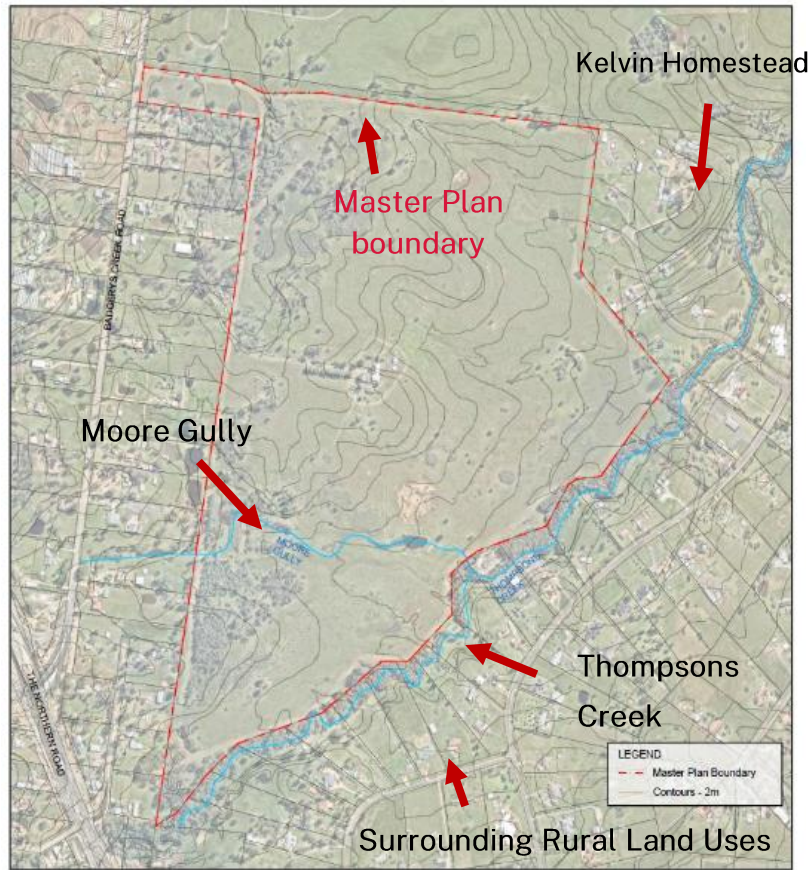


Figure 2 | Master Plan site and Local context map (Base Source: Western Parkland City Authority, 2023)

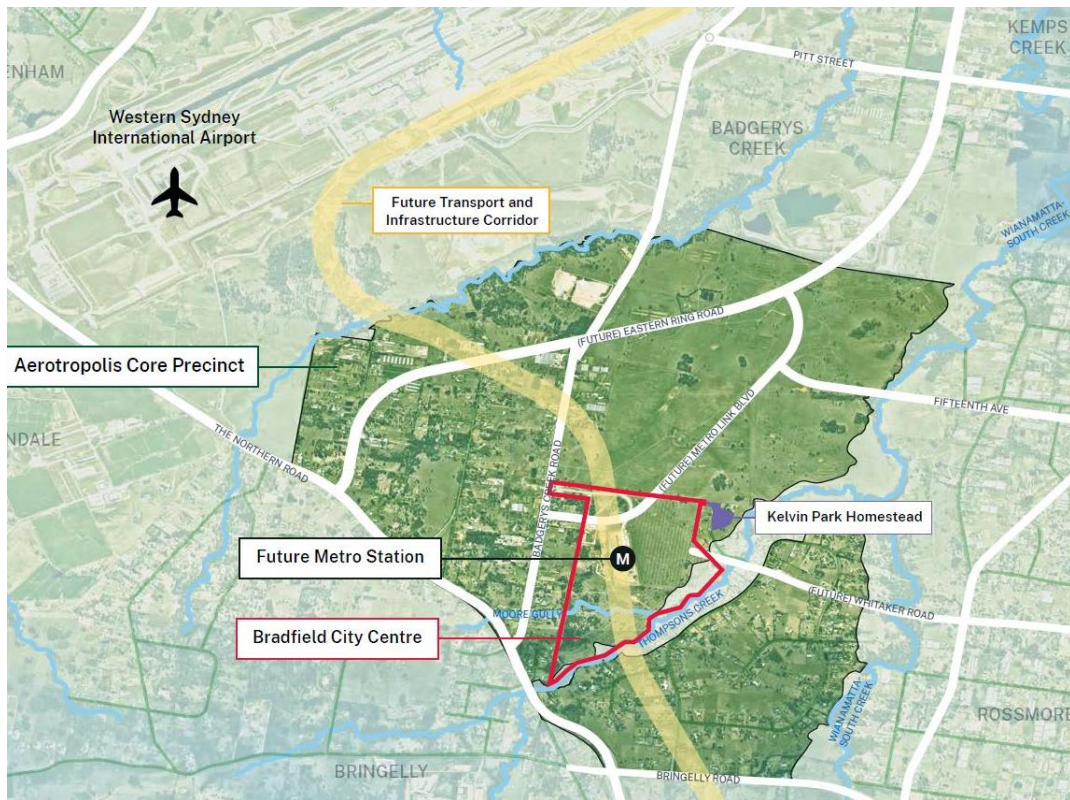


Figure 3 | Bradfield City Centre Regional Context (Source: Western Parkland City Authority, 2023)

1.3. Related projects and works

A number of development approvals have been issued or are in the process of being sought across the Bradfield City Centre site (Figure 4) including:

- The First Building (SSD-25452459), an advanced manufacturing and research facility was approved on 9 September 2022 and is currently under construction.
- Bradfield City Centre Stage 2A Enabling Works, includes bulk earthworks, civil road works, grading and levels for the site, public utilities, open space to enable fully serviced ‘super lots’ to be developed by WPCA or through private sector partners that will contribute to and support the early activation and placemaking for the Bradfield City Centre. An REF has recently been exhibited for these works.
- Building 2 Advanced Manufacturing Research Facility (SSD-58591961), an advanced manufacturing research facility. An EIS has recently been exhibited for this proposal.
- Central Park, Bradfield City Centre (SSD-65490715), a park adjacent to the Metro station in Bradfield City Centre. An EIS has recently been exhibited for this proposal.



Figure 4 | Proposed Master Plan Layout Showing Key Development Features
(Source: Western Parkland City Authority, 2024)

2 Master Plan

2.1 Master Plan overview

The Bradfield City Centre Master Plan establishes an urban structure and framework to deliver the vision and objectives for the City Centre.

It provides site-specific and fine grain considerations to guide future development. It seeks to deliver extensive open space and green space, provide a high level of connectivity and legibility, retain views and enhance Connections with Country.

The purpose of the Master Plan is to guide future development in the City Centre by:

- Identifying the vision, objectives, urban structure, and key outcomes for development
- Refining the Precinct Plan for the City Centre
- Supplementing the Aerotropolis DCP with site-specific development controls
- Establishing a site-specific Design Excellence Strategy for the City Centre
- Establishing Complying Development provisions for the City Centre
- Communicating the planning, design and environmental objectives and controls for future development applications
- Ensuring the orderly, efficient, and environmentally sensitive development of the land
- Promoting high-quality urban design and environmental outcomes.

2.2 Relationship to the Aerotropolis planning framework

The Master Plan refines and supplements the Precinct Plan and forms part of the DCP. It provides site-specific and place-based development controls to guide the future development of the City Centre and contain alternative benchmark solutions and additional development controls. In the event of any inconsistency between the Master Plan and the Aerotropolis DCP, the Master Plan will prevail. Future development proposals within or adjacent to the Master Plan area will need to consider, and demonstrate consistency with, the Master Plan.

2.3 Master Plan application

The Bradfield City Centre Master Plan comprises:

- A vision and objectives for the city centre
- Designing with Country values and built-form principles

- Design Excellence Strategy
- Complying development provisions
- Site-specific development controls and associated maps to define the city structure and guide land use, built form and building design, movement networks, public domain and open space.

The Master Plan application also includes proposed amendments to the Aerotropolis planning framework to facilitate and reflect the Master Plan, including:

- Amendments to the Land Reservation Acquisition Map within the Western Parkland City SEPP
- Amendments to the Precinct Plan, and
- Variations to the DCP controls.

The Master Plan application is supported by a range of technical documents and strategies. It adopts certain strategies by reference, including the Art and Cultural Strategy and Social Infrastructure Strategy (part of the Master Plan application documentation), as well as a Travel Demand Strategy, Public Domain Strategy, and Access and Servicing Strategy.

A link to the Master Plan and full list of supporting documents is provided at **Appendix A**.

Key aspects of the Master Plan are outlined in **Error! Reference source not found.**

Table 1 | Key aspects of the Master Plan

Aspect	Description
Master Plan area	114.6 hectares
Uses and activities	<p>The Master Plan area comprises a range of land-use zones (see Figure 5), including:</p> <ul style="list-style-type: none"> • Mixed Use zone: commercial, civic, tourism, entertainment, education, high technology industry and residential uses. • Enterprise zone: commercial, office, professional services, logistics, education and high technology industry. • Environment and Recreation zone: protect and restore areas of ecological and cultural value and provide recreational settings and activities. • SP2 Infrastructure zone (Transport and Infrastructure SEPP): infrastructure and related uses.
Built form	Indicative maximum building heights ranging from 17m to 60m (see Figure 7 for Height of Buildings).

Aspect	Description
Gross Floor Area (GFA)	Maximum permissible floorspace: <ul style="list-style-type: none"> Mixed Use zone: 2,316,000 sqm GFA Transport Infrastructure Corridor: Subject to future planning
Open Space	35.8 ha of open space including Central Park, Ridge Park, Regional Parkland along the Moore Gully and Thompsons Creek riparian corridor and local parks
Complying development	Change of use development provisions
Jobs	Between 20,000 and 24,000 jobs by the year 2056
Housing	Capacity for up to 10,000 residential apartments Affordable housing will be developed in line with government policy.
Estimated Development Cost	\$11.6 Billion
Timing and sequencing	Development to take place over 4 stages (see Figure 11 Staging Plan). The city centre is projected to take 50 years to reach its GFA capacity.



Figure 5 | Land Use Zoning under Western Parkland City SEPP
(Source: Western Parkland City Authority, 2024)

Key Chapters of the Master Plan are described in Table 2.

Table 2 | Bradfield City Centre Master Plan Chapters

Chapter	Description
1. Context	Sets the policy and geographical context for the Master Plan and outlines the Master Plan process.
2. Introduction	Outlines the purpose, application and status of the Master Plan, its relationship with instruments and other documents and the development contributions framework.
3. Vision and Principles	<p>Envisages a 24/7 ecosystem of culture, creativity and innovation in a living landscape of inspiration and experience.</p> <p>Provides 10 key objectives including Connected Country, innovation ecosystem, climate-resilient, 24/7 vibrancy, world-class parklands, central park, global connection, streets for all people, fine grain places, design excellence.</p> <p>Provides four key designing with Country values and built-form principles:</p> <ul style="list-style-type: none"> • Green: a parkland city experience • Connect: connected global and local • Travel: a global destination • Dream: innovation and growth
4. Master Plan	The Master Plan establishes an urban structure to deliver the vision and objectives (see Figure 6).
5. Design excellence Strategy	Proposes site-specific design excellence provisions that identify objectives, considerations and requirements for demonstrating design excellence. It identifies the location of Landmark and Gateway Building sites (see Figure 10) and sets criteria for development subject to a competitive design process, consideration by the State Design Review Panel or consideration by the local design review panel.
6. Complying Development Code	Establishes ‘change of use’ complying development provisions.
7. Land use and built form	Sets out alternative and additional benchmark solutions and performance outcomes for land use character (see Figure 9), height of buildings (see Figure 7), floor space distribution (see Figure 8), street setbacks, activation, street wall heights, building footprints, solar access, building materiality and affordable housing.

Chapter	Description
8. General Controls	Sets out alternative and additional benchmark solutions and performance outcomes for canopy cover and deep soil, water-sensitive urban design, public art, urban heat island effect, passive heating and cooling and wind impacts.
9. Movement	Sets out the proposed street network including pedestrian network, cycling network, public transport network and street types and hierarchy.
10. Public Domain and open space	Provides conceptual design considerations for a series of key city spaces, including Central Park, Ridge Park, City Walk East, Green Loop, Local Parks, City Parklands West, City Parklands East, Waterfront Promenade and the Moore Gully and Thompsons Creek parklands.
11. Social and Cultural Infrastructure	Provides indicative locations and recommendations for social and cultural infrastructure including educational, health centres, emergency services, community facilities, childcare centres, cultural facilities, aged care, civic spaces parks, open spaces, recreation and sporting facilities.
12. Staging and infrastructure delivery	The Master Plan will be developed over 4 stages spanning 50 years of development to deliver its full capacity (see Figure 11). Stage 1 of the city centre will be developed over a decade, focussed near the Metro Station, and includes the first building, key anchor tenants, transport infrastructure, civic and cultural facilities and key public domain.
Appendix A Variations to DCP controls	The Master Plan forms part of the DCP and provides a place-based vision, objectives, performance outcomes and benchmark solutions to guide future development in the Bradfield City Centre. The Appendix includes a schedule detailing where the DCP benchmark solutions have been varied or replaced by the proposed alternative and additional benchmark solutions.

2.4 Physical layout and design

The Master Plan establishes the urban structure and layout to deliver the vision and objectives for the city centre. The design of the Master Plan has been informed by Connecting with Country principles and ongoing Aboriginal engagement and has taken a landscape-led approach, providing over 30 ha of new green space that connects along Thompsons Creek to the wider Aerotropolis.

Within the Master Plan, a Green Loop circles the city centre connecting Ridge Park and the Enterprise Zone area in the North of the site with Central Park and local parks in the Mixed Use city centre and the Regional Parkland along the Moore Gully and Thompsons Creek corridor in the South of the site.

A major infrastructure corridor bisects the site, shown in yellow in Figure 6. The Master Plan does not propose permanent development in the existing 60m wide Special Purposes 2 (SP2) Infrastructure Zone corridor. A decision regarding future rail infrastructure in the corridor is the subject of ongoing review by Government.

Road transport connections from the site include the Bradfield Metro Link Road connecting to Badgerys Creek Road and the Northern Road to the south of the site and the future Eastern Ring Road in the north.

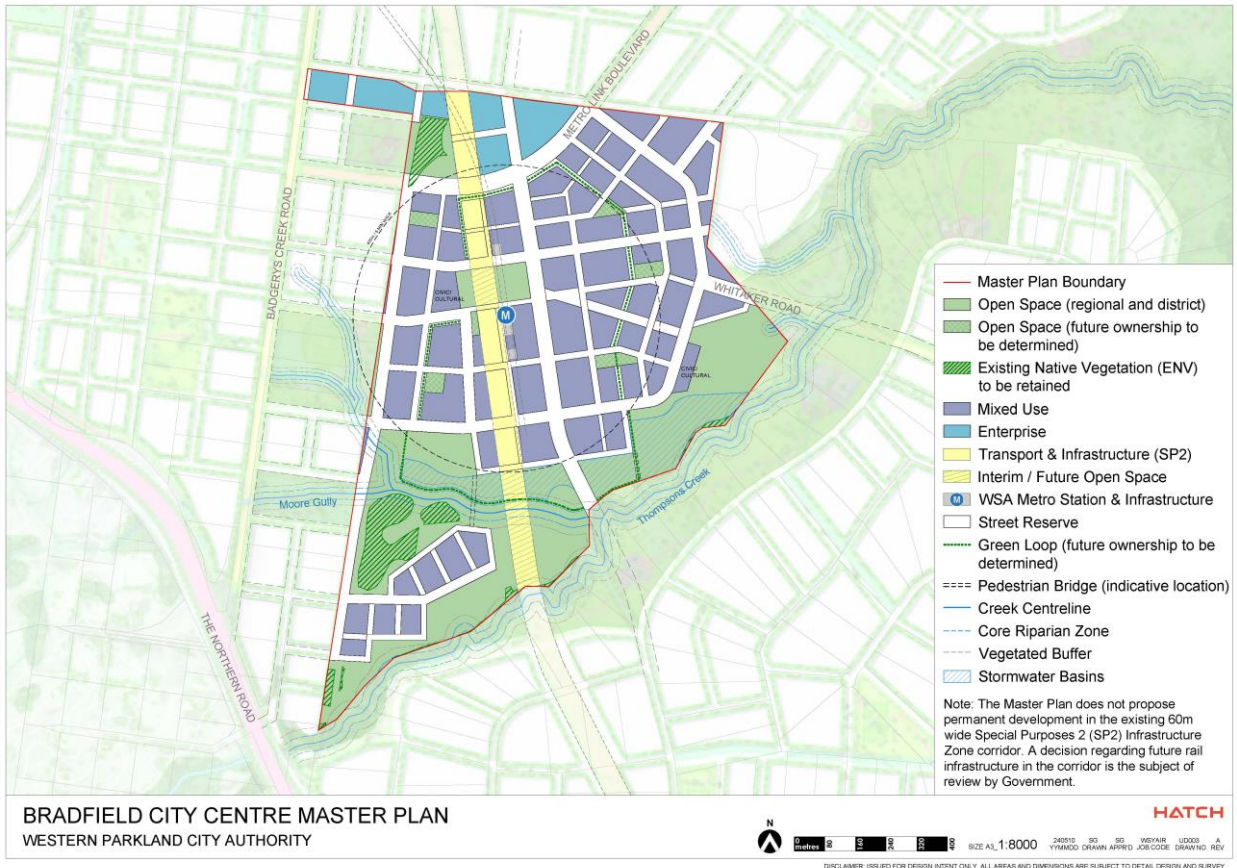


Figure 6 | Bradfield City Centre Master Plan (Source: Bradfield Development Authority 2024)

2.5 Land uses and built form

The Master Plan area comprises a range of land-use zones identified in the Western Sydney Parkland SEPP, including a Mixed-Use Zone, Enterprise Zone, Environment and Recreation Zone and SP2 Infrastructure Zone (see Figure 5).

Most of the developable area in Bradfield City Centre is zoned Mixed-Use which allows a wide range of commercial, entertainment, tourist, civic and residential uses. The Master Plan identifies different character areas within the Mixed-Use Zone responding to the amenity, attraction, access and value of each area. These character areas will guide land use and development decisions (see Figure 9).

An Enterprise Zone to the north of Metro Link Boulevard allows for commercial and light industrial uses. This is part of a larger Enterprise zone around the Aerotropolis intended to safeguard the strategic employment and industry development aspirations for the region.

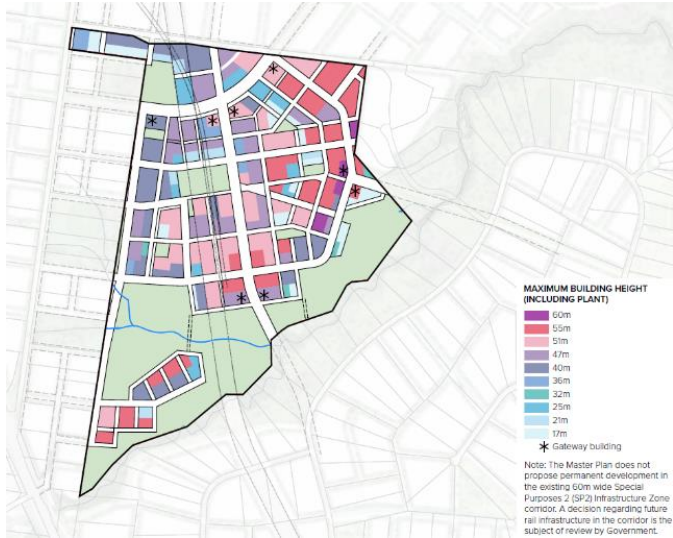


Figure 7 | Height of Buildings (Source: Bradfield Development Authority 2024)

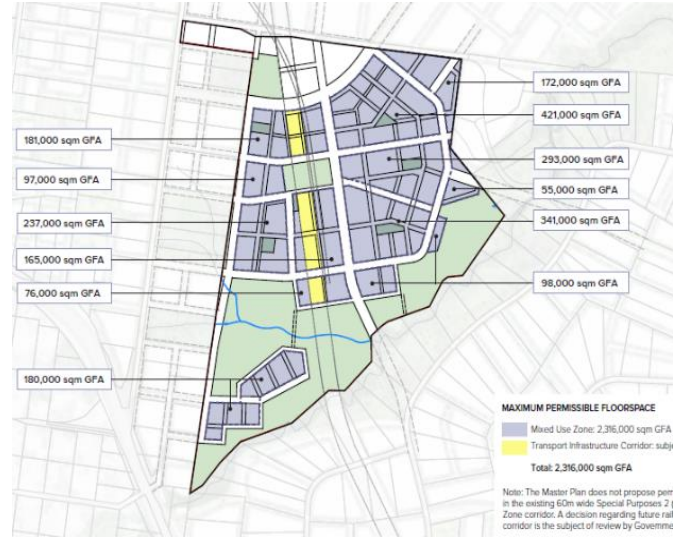


Figure 8 | Floor Space Distribution (Source: Bradfield Development Authority 2024)

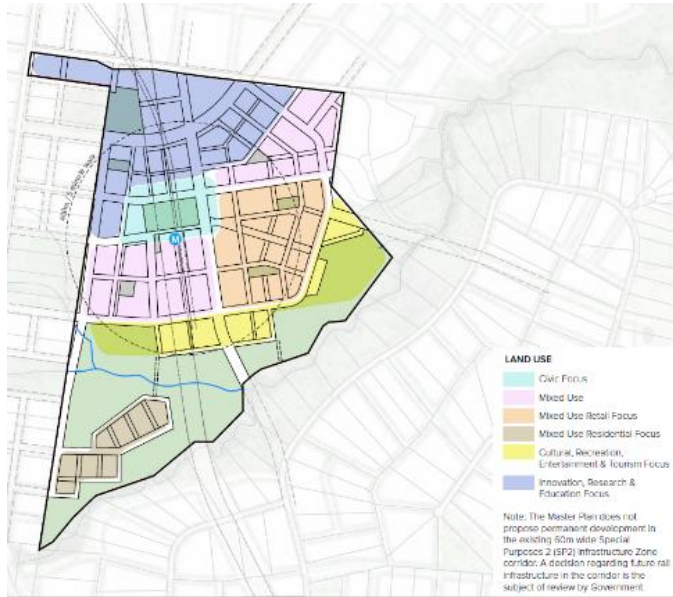


Figure 9 | Land-use Character Areas (Source: Bradfield Development Authority 2024)

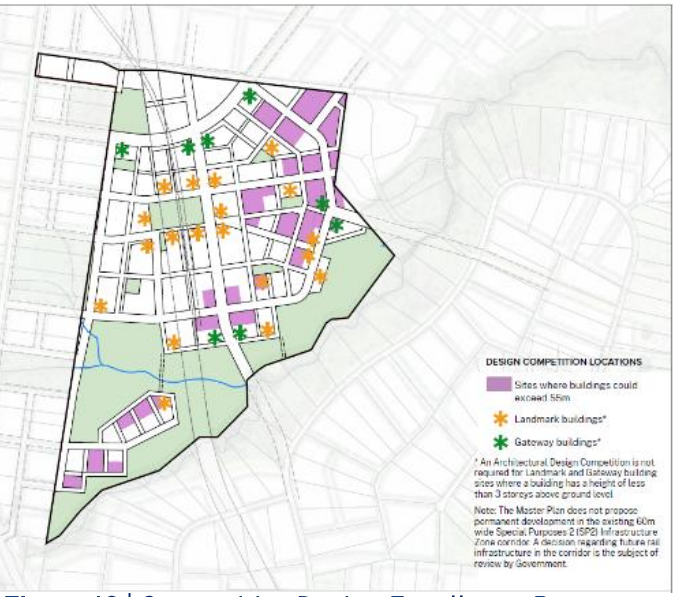


Figure 10 | Competitive Design Excellence Process (Source: Bradfield Development Authority 2024)

The Master Plan guides the appropriate height and scale of buildings across the city centre by setting the maximum building heights, ranging between 17m and 60m (see Figure 7Error! Reference source not found.). It also provides a floor space distribution map to ensure permissible

floor space is appropriately distributed to align with the scale of built form envisaged under the Master Plan (see Error! Reference source not found.).

The Master Plan's indicative yield of 10, 000 dwellings is based on dwellings within apartment buildings. Error! Reference source not found. The exact uses within each 'Superlot' (large lots for further subdivision into city blocks) will be provided in future detailed design applications based on market analysis and demand. Future buildings within the city blocks will exhibit design excellence. The Master Plan identifies the location and extent of design excellence considerations, including setting a competitive design excellence process for public buildings, buildings 55m or above and development on Landmark building and Gateway building sites (see Figure 10 Error! Reference source not found.).

2.6 Timing and sequencing

The Master Plan will be developed in stages. It is expected to take 50 years for the city centre to develop to be fully realised.

Stage 1 comprises approximately 20ha of land located in the central and north-western quadrant of the Master Plan area and will be the focus of development activity for the first 10 years. It includes the 2ha Central Park, 1.8ha of Ridge Park and major transport infrastructure including, the Metro Station, transit boulevard, rapid bus station, bus layover and charging facility, temporary commuter carpark, activation uses, and key access roads to the mixed-use and enterprise development parcels (see Figures 4 and 11).

Stage 2 incorporates the riparian parklands and adjacent development sites, which will be developed early to provide recreation opportunities and natural amenity for the new city centre. The timing and sequencing of Stages 3 and 4 are yet to be determined and development within the transport infrastructure corridor is subject to decisions by the NSW Government.

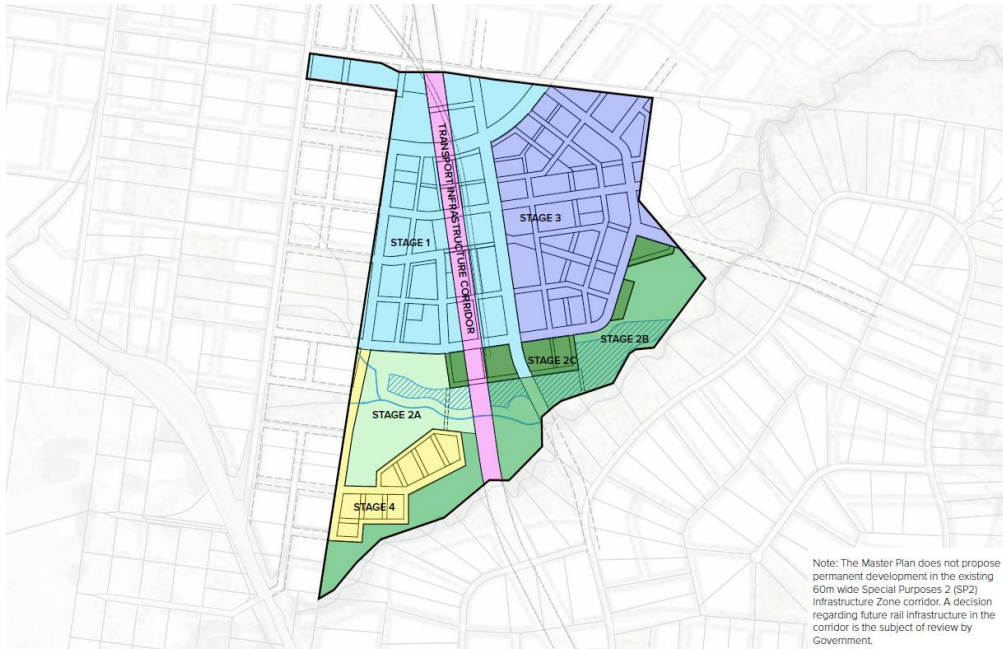


Figure 5 | Master Plan Staging Plan (Source: Bradfield Development Authority 2024)

3 Strategic context

3.1 Key strategic plans

The Master Plan is consistent with the strategies, plans and policies outlined in **Table** below, and therefore the Department considers it appropriate for the site.

Table 3 | Summary of government strategies, plans and policies.

Strategy, plan or policy	Consistency	Comments
Greater Sydney Region Plan	Consistent	<p>The Plan outlines how Greater Sydney will manage growth and change and guide infrastructure delivery. It sets the vision and strategy for Greater Sydney, to be implemented at a local level through District Plans.</p> <p>The Master Plan aligns with the Plan by locating housing and jobs close to transport infrastructure and open space.</p>
Western City District Plan	Consistent	<p>The Plan outlines how over the next 20 years the Western Parkland City will transform, drawing on the strength of the Western Sydney Airport and the Aerotropolis.</p>

Strategy, plan or policy	Consistency	Comments
		<p>Bradfield is located within the Western City District. The Master Plan will assist to achieve the 30-minute city vision by providing residents with quicker and easier access to jobs, housing and green spaces.</p>
<p>Western Sydney Aerotropolis Plan (WSAP) 2020</p>	<p>Consistent</p>	<p>The WSAP sets out a vision for the Aerotropolis of an accessible, innovative, connected city framed by the extensive blue and green corridors of the region and with the city’s structure and buildings shaped through a landscape led approach, with all work guided by the overarching objective to Recognise Country. It sets out a sequenced approach to precinct planning in order to optimise planned investment in major infrastructure that responds to the opportunities provided by the 24/7 operations of the WSI and create the impetus for early activation of the Aerotropolis.</p> <p>The Master Plan is consistent with the Planning Principles of the WSAP as it:</p> <ul style="list-style-type: none"> • Has been designed from a landscape led approach that includes retaining water elements, preserving and providing green spaces within walking distances from the key city blocks, civic spaces, and transport corridors. • Contributes to the Aerotropolis becoming a regionally and internationally significant employment area by providing for future commercial and employment land uses consistent with the land use zonings of the Western Parkland City SEPP. • Provides transport networks, including walking and cycling, across Bradfield City Centre. The Master Plan has been designed by considering the location, alignment and arrangement of the existing major infrastructure corridors and planned transport linkages to ensure the efficiency of the future transport network within, and to, the site. • Has been prepared in response to social infrastructure needs study, that provides a breakdown of relevant facility requirements for the site including health, education, arts, and creativity. • Has been prepared in consideration of existing and draft Special Infrastructure Contributions and Local Infrastructure Contributions.

4 Statutory context

4.1 Approval authority and planning pathways

Details of the legal pathway under which approval is sought for the Master Plan, along with the permissibility and planning pathways for future development proposals within the City Centre, are provided in Table 4.

Table 4| Approval authority and planning pathways

Consideration	Description
Approval Authority	Minister for Planning and Public Spaces under Sections 4.41 and 4.38 of Part 4.7 of the Western Parkland City SEPP.
Land use Permissibility	<ul style="list-style-type: none"> • The Master Plan site is land identified as Mixed Use Zone, Enterprise Zone and Environment and Recreation Zone under the Western Parkland City SEPP, as well as the Transport Infrastructure Corridor. • The commercial and employment uses envisaged in the Enterprise Zone are permissible with consent, as are the business, office, residential retail, entertainment and tourist uses envisaged in the Mixed Use Zone. • Conservation and recreation uses are permissible within the Environment and Recreation Zone, consistent with desired Master Plan outcomes for these areas of the site. • Future land uses within the Transport Infrastructure Corridor will be subject to future planning decisions.
Future Development Pathways	The Master Plan does not seek approval for any development or works. Any future development will be subject to a separate planning pathway. Under Section 4.42 of the Western Parkland City SEPP the consent authority for development must consider the Master Plan before granting consent for development on the Master Plan site or on adjacent land.

4.2 Master Plan Requirements

The Master Plan Guidelines set out the requirements for preparing, issuing and addressing Master Plan Requirements (MPRs). The Department is satisfied that the Master Plan addresses the matters set out in the MPRs issued on 17 October 2022 and is sufficient to enable an adequate consideration

and assessment of the Master Plan for determination purposes. The Department's consideration of the proponent's response to the MPR's is at Appendix D Table 6.

4.3 Matters for consideration

4.3.1 Objects of the EP&A Act

In determining the Master Plan, the Minister for Planning and Public Spaces should consider whether the project is consistent with the relevant objects of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (s 1.3) including the principles of ecologically sustainable development. The Department's consideration of those factors is described in Appendix D Table 2.

As a result of the analyses in Appendix D, the Department is satisfied that the Master Plan is consistent with the objectives of the EP&A Act and the principles of ecologically sustainable development (ESD).

4.3.2 EP&A Regulation

The Regulation requires the proponent to assess the consistency of the development with the relevant plan, in this case Chapter 4 of the Western Parkland City SEPP.

The Department is satisfied that the proponent has assessed the consistency of the Master Plan against Chapter 4 of the Western Parkland City SEPP.

The Department has undertaken its own assessment and is satisfied that the Master Plan is consistent with relevant provisions of the Western Parkland City SEPP. The Department's consideration is set out in Appendix D.

4.3.3 Aerotropolis Planning Framework

The Department has assessed the Master Plan against the Aerotropolis planning framework, including:

- Western Sydney Aerotropolis Plan (WSAP)
- Western Parkland City SEPP
- Western Sydney Aerotropolis Precinct Plan (Precinct Plan)
- Western Sydney Aerotropolis Master Plan Guidelines (Master Plan Guidelines), and
- Western Sydney Aerotropolis Development Control Plan (DCP).

The Department considers that the master plan is consistent with the various aims, visions, and objectives of these documents. Further detailed assessment is set out in Sections 3, 4, 6 and Appendix D.

4.3.4 Matters required by Western Parkland City SEPP

Part 4.7 of the Western Parkland City SEPP sets out matters to be considered by the Minister for Planning and Public Spaces when determining a Master Plan and amendments to the Precinct Plan. The Department’s full assessment of the Master Plan against the provisions of the SEPP is at Appendix D.

Master Plan considerations

Section 4.41 of the Western Parkland City SEPP outlines the matters that the Minister must take into consideration when determining master plans, the Department’s consideration of these matters is shown in Table 5.

Table 5 | Matters for consideration under Section 4.41

Matters	Consideration
(1) The Minister may approve a master plan that applies to specified land to which this Chapter applies.	This Chapter applies.
(1A) A master plan may only apply to land to which a precinct plan applies	The Precinct Plan applies to the Master Plan site.
(2) A Master Plan must-	-
(a) (repealed)	-
(b) specify the particular development that may be carried out as complying development on the land to which the master plan applies, and	Complying development for change of use development is specified in the Master Plan.
(c) contain development controls for the complying development, and	The Master Plan contains development controls for change of use complying development.
(d) contain the matters required by the master plan guidelines	The preparation of the Master Plan has been undertaken in accordance with the Master Plan Guidelines. In this regard, the Master Plan Requirements were addressed. Further consideration of consistency with the Master Plan Requirements can be found at Appendix D Table 5.
(3) The Minister may approve a master plan only-	
(a) With the consent of the owner of land to which the master plan applies, and	The proponent owns the site and has provided owners consent.

Matters	Consideration
<p>(b) If satisfied that the master plan is consistent with the Master Plan Guidelines, and</p>	<p>As required by the Master Plan Guidelines the proponent engaged in the Technical Assurance Panel (TAP) process, and the Master Plan received endorsement from the TAP on 17 August 2023 to lodge the Master Plan with the Department for assessment. Further consideration of consistency with the Master Plan Guidelines can be found at Appendix D Table 5.</p>
<p>(c) If the Minister has considered whether the master plan is consistent with the DCP, and</p>	<p>The proponent has demonstrated that the Master Plan is consistent with the relevant objectives and performance outcomes of the DCP and has adequately justified proposed variations to DCP controls. Further consideration of the consistency of the Master Plan with the DCP can be found at Appendix D. Further assessment of the proposed variations to the DCP can be found in Section 6 and Appendix F.</p>
<p>(d) If satisfied that</p> <ul style="list-style-type: none"> i) the master plan is consistent with the Precinct Plan or ii) the inconsistency is appropriate, taking into account the Master Plan Guidelines. 	<p>The proponent has demonstrated that the Master Plan is consistent with the relevant objectives and requirements of the Precinct Plan. Further consideration of the consistency of the Master Plan with the Precinct Plan can be found at Appendix D.</p>
<p>(4) A draft master plan is to be published on the NSW planning portal for at least 28 days before it is approved by the Minister.</p>	<p>The draft Master Plan was exhibited on the NSW planning portal for 28 days.</p>
<p>(5) A master plan approved by the Minister must be published on the NSW planning portal and takes effect on the day it is so published.</p>	<p>If approved, the Master Plan will be published on the NSW planning portal and take effect from that date.</p>
<p>(6) A master plan has effect for 5 years from the date it is approved by the Minister or a longer period approved by the Minister.</p>	<p>The Master Plan is proposed to have effect for 20 years from approval.</p>

Precinct Plan amendment considerations

The Master Plan seeks to amend the Precinct Plan to reflect the fine-grained design of the Master Plan's street layout, land uses and stormwater infrastructure.

Under the Western Parkland City SEPP development applications must demonstrate consistency with the Precinct Plan. Development consent cannot be granted unless the consent authority has considered any master plan applying to the site. To ensure alignment between a master plan and the Precinct Plan the Master Plan Guidelines state that the Precinct Plan may be amended where a superior planning outcome and consistency with the Aerotropolis planning framework can be achieved. Section 4.38 of the Western Parkland City SEPP outlines the matters that the Minister must take into consideration when determining Precinct Plan amendments. These matters are summarised in Table 6. The Department considers that the proponent has adequately justified proposed amendments to the Precinct Plan to reflect the Master Plan design. Further assessment of the proposed Precinct Plan amendments can be found in **Section 6** and **Appendix E**.

Table 6 | Matters for consideration under Section 4.38

Matters	Consideration
(1) A precinct plan is to be prepared by the Planning Secretary and must be approved by the Minister.	The amended Precinct Plan has been prepared by the Secretary and will be considered by the Minister for approval.
(2) A precinct plan is to apply to specified land (a precinct) to which this Chapter applies.	The Precinct Plan and Chapter apply.
(3) A precinct plan must contain the following— (a) the strategic vision and general objectives for the precinct, (b) a map showing proposed land uses for land in the precinct, (c) the performance criteria for development on land in the precinct, (d) proposals for public utility infrastructure, roads and transport on land in the precinct, (e) proposals for total water cycle management for the precinct.	The amended Precinct Plan contains the required matters.
(3A) A precinct plan may contain other matters the Planning Secretary considers appropriate.	No other matters are considered appropriate.
(4) A precinct plan must be consistent with this Chapter.	The amended Precinct Plan is consistent with this Chapter.
(5) A draft precinct plan is to be published on the NSW planning portal for at least 28 days before it is approved by the Minister.	The draft Precinct Plan amendments were exhibited on the NSW planning portal for 28 days.
(5A) Before approving a precinct plan, the Minister must consult the Western Parkland City Authority about the following matters— (a) whether the plan appropriately provides for creating active, vibrant and sustainable communities and locations that support— (i) national and global business, and (ii) the Airport, (b) whether the plan appropriately supports the economic growth and development of the Western Sydney Aerotropolis by— (i) encouraging investment, and (ii) providing for land uses that generate employment opportunities, (c) whether the infrastructure proposed by the plan is likely to be developed in an efficient and timely way.	The BDA (formerly Western Parkland City Authority) was consulted and provided a response that endorsed the amended Precinct Plan, noting that it was also the proponent.
(6) A precinct plan approved by the Minister must be published on the NSW planning portal and takes effect on the day it is so published.	If approved, the amended Precinct Plan will be published on the NSW planning portal and take effect from that date.
(7) A precinct plan may be amended and this section applies to the amendment of the precinct plan in the same way as it applies to a precinct plan.	The proposal is an amendment to the Precinct Plan. This Chapter applies and has been considered.

5 Engagement

5.1 Preparation of Master Plan Requirements

During the preparation of the Master Plan Requirements for the proposal, the Department consulted with relevant state government agencies and local councils in accordance with the Master Plan Guidelines.

5.2 Technical Assurance Panel Process

The Master Plan Guidelines specify that a Technical Assurance Panel (TAP) is required to be formed to oversee the preparation of a Master Plan through a collaborative and iterative co-design process. The TAP process seeks to ensure the master plan aligns with the vision and intended outcomes for development in the Aerotropolis.

On 8 November 2022, the TAP for the draft Bradfield City Centre Master Plan was established and held its first meeting with the proponent. The TAP membership comprised representatives from council and government agencies listed in **Appendix D Table 7**.

The TAP co-design process spanned 9 months and involved 7 meetings and 5 technical workshops. It sought to identify and resolve key planning issues for the Master Plan early in the planning process, including:

- Structure of the Explanation of Intended Effects (EIE)
- Proposed amendments to the Western Sydney Aerotropolis Precinct Plan
- Proposed amendments to the Western Sydney Aerotropolis DCP
- Exempt and complying development strategy
- Design excellence and Designing with Country
- Land use and open space
- Stormwater infrastructure and water cycle management
- Street network, hierarchy and ownership
- Staging, funding and infrastructure delivery

On 17 August 2023, the Independent Chair issued a Letter of Advice (**Appendix G**) for the draft Bradfield City Centre Master Plan to the Secretary of the Department recommending the Master Plan was suitable for lodgement, subject to a number of recommendations. The recommendations included edits to various paragraphs and sections of the Master Plan, amendments to the EIE and a

separate discussion paper to be prepared on the proposed amendments to the Precinct Plan and DCP. The TAP recommendation noted that the proponent was still working with GANSW to finalise its Design Excellence Strategy.

5.3 Exhibition of the Master Plan

5.3.1 Public exhibition of the Master Plan

After accepting lodgement of the Master Plan Package the Department:

- publicly exhibited the Master Plan from 5 February 2024 until 4 March 2024 on the NSW Planning Portal, including:
 - The Master Plan
 - An Explanation of the Intended Effect for proposed SEPP amendments
 - Proposed Precinct Plan amendments, and
 - Proposed DCP variations
- notified occupiers and landowners in the vicinity of the site about the public exhibition and
- notified and invited comment from relevant government agencies and Liverpool City Council.

Exhibited documents can be accessed on the planning portal at:

<https://www.planningportal.nsw.gov.au/draftplans/under-consideration/bradfield-city-centre-master-plan>

5.3.2 Summary of advice received from government agencies

The Department received advice from 15 government agencies on the Master Plan.

A summary of the agency advice is provided in Table 7. A link to the full copy of the advice is provided in Appendix B.

Table 7 | Summary of agency advice

Agency	Advice summary
Heritage NSW (HNSW)	<ul style="list-style-type: none"> • The Master Plan may impact the character of the nearby State Heritage Register listed ‘Kelvin’ homestead by changing its setting from rural to townscape and potentially impact long-range views to and from Kelvin. • Supports the mitigation measures and recommendations of the Proponent’s Statement of Heritage Impact. • Agrees with the Aboriginal Cultural Heritage Assessment Report (ACHAR) that an Aboriginal Heritage Impact Permit would be required to authorise harm to Aboriginal sites identified in the ACHAR.

Agency	Advice summary
Sydney Water	<ul style="list-style-type: none"> • A detailed annual breakdown of indicative dwelling numbers for the Bradfield City Centre Master Plan should be provided. • Relevant feasibility or application cases are to be lodged with Sydney Water through the Proponents Sydney Water Account Manager. • Future complying development would likely require a Sydney Water Section 73 certificate depending on the proposed change of use. • A range of stormwater infrastructure asset requirements were needed for Bradfield City Centre and needed to be designed in consultation with Sydney Water.
NSW Rural Fire Service (RFS)	<ul style="list-style-type: none"> • Future development(s) within the proposed master plan must comply with the requirements of relevant sections of Planning Bush Fire Protection (PBP) 2019.
Department of Primary Industries (DPI) - Fisheries	<ul style="list-style-type: none"> • Moore Gully and Thompsons Creek are both considered key fish habitat and should be improved and maintained. • The recommendations outlined in the Biodiversity Strategy and Impact Assessment are supported. Riparian buffer zones are to be established in accordance with DPI guidelines and a rehabilitation strategy developed.
Sydney Metro	<ul style="list-style-type: none"> • Two rail corridors apply to the site. • Any development above or near the Metro substratum will be required to comply with Sydney Metro Corridor Protection Technical Guidelines and demonstrate nil adverse impact on Sydney Metro infrastructure. • That controls for noise and vibration mitigation to sensitive receivers be provided as part of the Master Plan.
NSW Environmental Protection Agency (EPA)	<ul style="list-style-type: none"> • The site audit statement concludes that the site can be made suitable for the range of uses envisaged by the Master Plan subject to management under the Asbestos Management Plan. • There is a risk of land use conflict in the future as the presence of residential development may result in any future adjacent commercial and industrial development being limited in terms of scope or operation. • The Master Plan noted the need for land for waste infrastructure but did not identify land for this purpose. • The Circular Economy Waste Strategy could also have more fully addressed the sustainability aims of the Master Plan.
NSW State Emergency Service (SES)	<ul style="list-style-type: none"> • Recommends that additional flood modelling, considering the full range of flood risk to the site, be undertaken. • Consideration be given to the impact of flooding on the transport infrastructure and people using it, up to and including the PMF. • Recommends pursuing site design and stormwater management that reduces the impact of flooding and minimises any risk to the community and ensures all proposed sensitive uses (including schools, childcare facilities, Emergency Services and Medical Facilities) are located above the PMF extent.

Agency	Advice summary
Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Sustainable Government team	<ul style="list-style-type: none"> • The Sustainability Report is comprehensive and sets a level of ambition which positions the government to lead by example. • Opportunities to improve the report include: <ul style="list-style-type: none"> ○ aligning with UN Sustainable Development Goals ○ the Greenhouse Gas Protocol ○ Sustainable Cities and Regions 10-year strategy ○ NatHERs and NABERS ratings and ○ Global Liveability Ranking.
Endeavour Energy	<ul style="list-style-type: none"> • Endeavour Energy noted the importance of the proponent continuing to engage/liaise with Endeavour Energy’s Customer Networks Solutions Branch to ensure a suitable electricity supply is available as the projects progress.
Greater Sydney Parklands (GSP)	<ul style="list-style-type: none"> • A design excellence process for open space is supported. • Sustainable funding for ongoing operational, maintenance and asset renewal requirements needs consideration. • Supportive of exempt development proposal for temporary major events. • Recommends that lighting noise and access impacts from the proposed temporary events spaces on adjacent land uses and built form i be considered. • Options should be explored to ensure larger more contiguous areas of open space are delivered in the south-east corner of the site.
Western Sydney International (WSI)	<ul style="list-style-type: none"> • The Obstacle Limitation Surface (OLS) map, as well as Procedures for Air Navigation Services – Aircraft Operations (PANS OPS), need to be considered when assessing building height that exceeds that determined as appropriate in the Precinct Plan. • Given the Master Plan enables variations to the maximum height limits, the site-specific planning controls should be amended to require early consultation with WSI. • Any development that proposes to impact protected airspace, or the safe operation of the airport, requires a detailed aviation impact assessment for such development. • The Master Plan should note that long-term intrusions into the PANS-OPS cannot be approved under the Commonwealth legislation. • The City Centre sits within the Parkland Priority Areas identified within the DCP, however given its proximity to the Airport, further consultation is requested to discuss measures to mitigate or manage wildlife attraction, particularly during the design process for future open space, landscape design, green roofs, basin design and major event spaces. • There is an opportunity for active transport links to provide connections between the airport and Bradfield. • Recommends that the proposed frequency of services be reviewed to enable travel behaviours that maximise the use of public transport.

Agency	Advice summary
Department of Climate Change, Energy, the Environment and Water (DCCEEW) - Biodiversity, Conservation and Science Group (BCS)	<p><u>Biodiversity and riparian corridors</u></p> <ul style="list-style-type: none"> The Biodiversity Strategy and Impact Assessment (BSIA) report notes that virtually all of the site is biodiversity-certified under the <i>Biodiversity Conservation Act 2016</i> and that no clearing of existing native vegetation is proposed within the non-certified area. A revised biodiversity assessment should be prepared to consider any future development proposal for realignment of Moore Gully. Further surveys should be undertaken for the potential presence of the critically endangered Elderslie Banksia Scrub Forest. Clarification be provided of the location of the <i>Marsdenia viridiflora subsp. viridiflora</i> - endangered population. To achieve a better biodiversity outcome, exclude stormwater and other infrastructure from vegetated areas north and south of Moore Gully. Development proposed as part of Stage 4 in the southwest corner of the site should be reconsidered due to likely indirect impacts on the existing native vegetation. <p><u>Flooding</u></p> <ul style="list-style-type: none"> The exhibited Flood Impact Assessment does not address the full range of flood events and is inconsistent with the NSW Flood Prone Land Policy and the Manual, the Flood Risk Management Guidelines, the Western Sydney Aerotropolis Development Control Plan 2022 (DCP) and the Ministerial Direction 4.1 A revised Flood Impact and Risk Assessment should be prepared. <p><u>Stormwater</u></p> <ul style="list-style-type: none"> The location of all existing streams within the Master Plan area should be reviewed, together with the existing catchment area for each stream, to ensure all streams required to be retained by the DCP are retained. Parts of the proposed stormwater management arrangements will have impacts and implications beyond the Master Plan site boundary. No preliminary civil engineering plans or functional design drawings are provided for the stormwater systems and the staging plan in the Infrastructure Delivery Strategy does not include any stormwater management infrastructure in Stage 1. It is Recommended that these plans be prepared. figures intended to replace those in the Precinct Plan be revised to show the correct placement of stormwater treatment systems as shown in the Integrated Water Cycle Management Plan.
Department of Education (DoE) - School Infrastructure NSW (SINSW)	<ul style="list-style-type: none"> The proposed growth of the Bradfield City Centre and wider Aerotropolis Core Precinct will result in a requirement for one future additional primary school and a high school. The timing of delivery and location of these school sites will be subject to consultation between relevant government agencies. Any future school sites would need to align with the requirements of the DoE School Site Selection Guidelines (2023). Future school sites must sit above the Probable Maximum Flood Level. The exhibited Flood Impact Assessment be revised to assess the full range of flood scenarios, including the PMF event.

Agency	Advice summary
Water NSW	<ul style="list-style-type: none"> It has no land or assets in the vicinity of the Master Plan area. For future local and regional developments (i.e. non SSD proposals), water supply works approvals may be required (e.g. for temporary dewatering purposes).
Transport for NSW (TfNSW)	<ul style="list-style-type: none"> It was a member agency of the TAP and has previously reviewed and provided feedback during the co-design process, which concluded in August 2023. Further feedback relevant to transport planning, road design and servicing requirements will be addressed in the Access and Servicing Plan, an undertaking within the Master Plan.

5.3.3 Summary of council submissions

Liverpool City Council, Penrith City Council, Wollondilly Shire Council and The Parks NSW - Sydney's Parkland Councils (including: Blue Mountains City Council, Camden Council, Campbelltown City Council, Fairfield City Council, Hawkesbury City Council, Liverpool City Council, Penrith City Council and Wollondilly Shire Council) provided comments on the project.

The Master Plan is located in the Liverpool LGA. Both Liverpool City Council and Penrith City Council were represented on the TAP for the Master Plan.

A summary of the issues raised by Western Parkland City Councils is provided in [Table 8](#) and a link to all submissions in full is provided in [Appendix B](#).

Table 8 | Summary of issues raised by council

Council	Submission summary
Liverpool City Council	<p><u>Impacts on existing centres</u></p> <ul style="list-style-type: none"> It is requested that the Master Plan appropriately considers the hierarchy of existing strategic centres in Penrith and Liverpool and seeks to complement rather than compete. <p><u>Infrastructure design, funding and delivery</u></p> <ul style="list-style-type: none"> There is a need for an all of government coordination of the design, delivery and maintenance of infrastructure. The Final Master Plan must include sufficient detail in relation to development contribution considerations, noting that the Contributions Plan has not been finalised for the Western Sydney Aerotropolis. It is recommended that any sites specified for schools, recreation and key social infrastructure are retained in the Master Plan. Concerns are raised regarding the impact of the Major Infrastructure Corridor on the precinct's connectivity. Particularly on the proposed active transport network. Consideration is required on how the provision of the Fifteenth Avenue Smart Corridor is factored into the development of Bradfield and onto the Western Sydney Airport in accordance with the Western Sydney City Deal. An indoor aquatic centre is required. It is unclear if the 'Moore Gully Swimming Pool' will be an aquatic centre.

Council	Submission summary
	<ul style="list-style-type: none"> • Raised intersection crossings that prioritise pedestrian movement and pavement painting for bike lane turns is highly advised. • Variation to the solar access requirements to local parks is not supported. A greenfield site with no existing built environment should maintain the minimal 70% solar access requirement to open spaces. <p><u>Connectivity</u></p> <ul style="list-style-type: none"> • Further analysis of potential connectivity to surrounding sites and major corridors such as Fifteenth Avenue, Bringelly Road and The Northern Road is required. <p><u>Development controls</u></p> <ul style="list-style-type: none"> • Any DCP applying to the site shall include development controls for: <ul style="list-style-type: none"> ○ road infrastructure. ○ public and active transport network ○ parking ○ traffic impact assessment requirements for staged developments ○ waste and loading facilities ○ green travel plan requirements <p><u>Affordable housing</u></p> <ul style="list-style-type: none"> • It is recommended that clear targets are set for affordable housing with planned incentives for achieving this goal. <p><u>Public art</u></p> <ul style="list-style-type: none"> • The Art Strategy should be revised to achieve consistency with the Western Sydney Aerotropolis Plan, the DCP and Recognise Country and acknowledge the migrant and transnational heritage of the Liverpool area. The Strategy should identify who will deliver public art within Bradfield. <p><u>Stormwater management</u></p> <ul style="list-style-type: none"> • Stormwater management system shall demonstrate that the combined catchment contributing overland flow to each street drainage system is no more than 15Ha to avoid requirement of trunk drainage system. <p><u>Biodiversity</u></p> <ul style="list-style-type: none"> • The proposed realignment of Moore Gully and the extent of impacts on native vegetation and Environment and Recreation zoned land should be further addressed in the Biodiversity Strategy and Impact Assessment. • Variation of the in-lot tree canopy target percentage is not supported, especially given that permeability has been reduced in all areas. <p><u>Design Excellence</u></p> <ul style="list-style-type: none"> • The design excellence strategy should include objectives and controls for the public domain to ensure the project delivers an integrated approach to streetscape, landscape and building design.
Penrith City Council	<p><u>Master Plan process</u></p> <ul style="list-style-type: none"> • Council should be consulted before any future Master Plan request is submitted in the Penrith LGA. • Clarity around the master plan process is sought. <p><u>Infrastructure funding and delivery</u></p>

Council	Submission summary
	<ul style="list-style-type: none"> • Penrith and Liverpool Councils have collaborated to prepare draft development contribution plans to ensure the collection of development contributions for local infrastructure within the Aerotropolis. • Notes the Master Plan proposes any public works outside of a State or local contribution plan are proposed to be secured in a Voluntary Planning Agreement (VPA). • Concern is raised over potential cost shifting for certain stormwater infrastructure from Sydney Water to Council. Such matters require resolution at the master planning stage and should not be deferred to a VPA. • Concern is raised about the funding and delivery of community facilities. <p><u>Impact on existing centres</u></p> <ul style="list-style-type: none"> • In the Master Plan, it is not clear how Bradfield will interrelate and build on the cohesion of the existing centres within the Metropolitan Cluster.
Wollondilly Shire Council	<p><u>Connectivity</u></p> <ul style="list-style-type: none"> • Strongly recommends a range of regional road and rail upgrades for public transport and freight to better connect the Western Sydney International Airport with Wollondilly and the South Western Sydney and Illawarra Regions.
The Parks NSW – Sydney’s Parkland Councils	<p><u>Community Consultation</u></p> <ul style="list-style-type: none"> • An extension to the exhibition period of an additional 60 days should be granted to enable all stakeholders the opportunity to comment on the draft Master Plan and detailed documentation provided. It is also recommended that further detailed technical briefings are held to work through the various elements of the draft Master Plan with The Parks’ Councils. <p><u>Connectivity</u></p> <ul style="list-style-type: none"> • That the Bradfield City Centre vision and objectives be expanded to better recognise the fundamental importance of connectivity with the surrounding areas and wider Western Parkland City. The relationships between Bradfield and Western Parkland City in the context of a polycentric city structure requires further exploration including demonstration of how the City Centre will be complementary to and contribute to the growth and development of other metropolitan centres. • Stronger focus in the draft Master Plan on how the City Centre will connect to its immediate and wider context via road improvement works and public transport is required to address mobility, access to employment and traffic congestion impacts off-site. <p><u>Growth and Employment</u></p> <ul style="list-style-type: none"> • The draft Master Plan includes provisions to protect the jobs capacity of the City Centre, ensuring that there will be protection mechanisms long-term for a capacity of at least 700,000 square metres of employment floor space to allow for 20,000 to 24,000 jobs. • That the evidence base relied on for the growth and staging of the City Centre be reviewed and updated to include current assumptions regarding forecast growth, to be used to prepare a realistic staging plan to inform infrastructure investment coordination and optimisation. • That retail gravity modelling be undertaken to understand the economic impact of the proposed City Centre on other metropolitan and strategic centres in the

Council	Submission summary
	<p>Western Parkland City, and appropriate provisions included in the draft Master Plan that consider the implications of this impact.</p> <ul style="list-style-type: none"> The draft Master Plan include provisions to ensure that the transitioning of land use can be achieved as the city centre matures, particularly relating to how the Mixed Use Zone will be regulated to achieve this transition. <p><u>Infrastructure funding and delivery</u></p> <ul style="list-style-type: none"> Locations and funding commitments, including early acquisition of land for key infrastructure must be secured, including schools and the community health centre. <p><u>Solar access and Amenity</u></p> <ul style="list-style-type: none"> A review of building heights adjacent to public open spaces is required to ensure that minimal overshadowing of public spaces occurs, and that amenity is maintained. <p><u>Affordable housing</u></p> <ul style="list-style-type: none"> Clear provisions are written into the Master Plan development controls and legislative framework setting out the 30% requirements for affordable housing, provided in perpetuity.

5.3.4 Summary of public submissions

The Department received 63 submissions during the public exhibition period of the Master Plan (9 submissions from organisations and special interest groups and 54 submissions from individuals). 40 submissions objected to the project, 9 submissions supported the project and 14 provided comment. Further detail is provided in Table 9 and a link to all submissions in full is provided in Appendix B.

Table 9 | Submissions on the Master Plan

Submitter	Number of submissions	Position
Organisation/Special interest groups		
Western Sydney University (WSU)	2	Comment
Urban Development Institute of Australia (UDIA)	1	Comment
Urban Taskforce	1	Comment
Shelter NSW	1	Object
Community Housing Industry Association NSW (CHIA NSW)	1	Comment
Committee for Sydney	1	Comment
Action for Public Transport (NSW) Inc. (APT NSW)	1	Support

Submitter	Number of submissions	Position
Green Building Council Australia (GBC)	1	Comment
Submissions from community members		
	9	Support
	37	Object
	8	Comment
TOTAL	63	

The key issues raised by the public relate to privacy concerns, public transport, planning for Luddenham Village, affordable housing and neighbour impacts are set out in Table 10.

Table 10 | Key issues raised in public submissions on the Master Plan

Issue		% of Submissions
Privacy concerns	Privacy concerns related to the Smart Cities vision	43.5% (27)
Public transport	Support for additional public transport	9.7% (6)
Luddenham Village	Concerns raised that planning for Bradfield City Centre is being prioritised over Luddenham Village	8.1% (5)
Affordable Housing	Concerns raised over the lack of an affordable housing target in the Master Plan	6.4% (4)
Neighbour impacts	Concerns raised about the impacts of the Master Plan on neighbouring properties	6.4% (4)

5.4 Response to submissions

Following the public exhibition period, the Department placed copies of all submissions received on its website. Subsequently, the Department requested the proponent to respond to the issues raised in the submissions and the advice received from government agencies. In addition, the Department requested the proponent provide additional information on flood management, impacts on biodiversity and proposed precinct plan amendments, as well as further consideration of the objectives and performance outcomes of the DCP.

The proponent's RtS provided additional information and clarification, in response to the issues raised in submissions and requested by the Department, and amended reports including:

- the Master Plan

- Biodiversity Strategy and Impact Assessment
- Flood Impact Risk Assessment
- Art and Culture Strategy Report
- Social Infrastructure Strategy Report
- Integrated Water Cycle Management Plan

The Department sought further review of the updated FIRA by DCCEEW and SES to ensure that the additional flood modelling undertaken addressed the issues raised regarding flood management.

5.5 Key post-exhibition changes

In responding to submissions, and the Department’s request for information, the proponent revised key elements of its Master Plan package. The Department considers that the post exhibition changes made do not trigger the need for re-exhibition.

The key elements which were revised are set out in Table 11.

Table 11 | Key post-exhibition changes to the Master Plan and Precinct Plan amendments

Element	Description
Master Plan	
General amendments	Improvements to the structure and layout and descriptions of controls.
Street layout	Changes made to the in the north-eastern corner of the site to respond to submissions about the potential for significant impacts on neighbouring site access.
Affordable housing	Additional control requiring future developments to provide affordable housing in line with current NSW Government policy.
Wind impacts	Additional control to ensure wind impacts of future development are appropriately managed to ensure public safety and comfort around new buildings and open space.
Flood management	Additional control to prohibit ground floor residential in areas impacted by the PMF. Notation added to plans stating: <i>Land to the south of Moore Gully requires further investigation and detailed design to mitigate flood impact and risk prior to submission of any development application for that land.</i>

Element	Description
Key City Spaces	Additional control requiring future development applications to be consistent with the Public Domain Strategy which sets out requirements for pavements, landscaping and street furniture.
Road Network Design and Travel Demand	Additional controls in relation to the need for intersection designs, traffic calming measures, pedestrian and cycle crossings and sustainable travel. The controls will require future development applications to consider the Bradfield City Centre Access and Servicing Plan, Bradfield City Centre Travel Demand Strategy and provide a Green Travel Plan.
Public Art	Amendments made to the Arts and Cultural Strategy to address Liverpool City Council comments and an additional control to require future development applications to have consideration for the Bradfield City Centre Arts and Culture Strategy.
Exempt and complying development	Removal of proposed exempt development provisions Refinements to complying development provisions for change of use to include all relevant provisions from the <i>State Environmental Planning Policy (Exempt and Complying Development Codes) 2008</i> .
Design excellence strategy	Changes made to design excellence considerations and design competition requirements.
<u>Precinct Plan</u>	
Street Hierarchy figure	Changes made to reflect the change made to the Master Plan street layout.
Total Water Cycle figure	Change made to reinstate stormwater infrastructure in the south of the site which was removed in error.
Design Competition figure	An additional amendment to the Precinct Plan is proposed to reflect that the Master Plan is not subject to Section 4.32 Architectural design competition of the Western Parkland City SEPP.

Following the Department's assessment of the application and consideration of the Proponent's response to submissions, additional changes have been recommended and these are discussed in Section 6 of this report.

6 Assessment

The Department has considered the Master Plan, the issues raised in submissions and the proponent's RtS and additional information in its assessment of the Master Plan. The Department considers the key issues associated with the Master Plan are:

- Design excellence
- Flood management and risk
- Affordable housing
- Complying development
- Precinct Plan amendments
- DCP variations, and
- SEPP amendment.

6.1 Design excellence

The Western Parkland City SEPP provides design excellence provisions for development within the Aerotropolis. Section 4.30(2) states that the Design Excellence provisions of the SEPP do not apply to land subject to a master plan if the consent authority is satisfied the master plan adequately provides for assessment of the design quality of the development.

The Master Plan proposes site-specific design excellence provisions (the Design Excellence Strategy) that identify objectives, considerations and requirements in demonstrating design excellence. It also sets criteria for development subject to a competitive design process, consideration by the State Design Review Panel or consideration by the local design review panel.

Submissions

Greater Sydney Parklands commented that design excellence should be applied to Open Space.

Liverpool City Council commented that the Design Excellence Strategy needs to include objectives and controls for the public domain ensuring an integrated approach to streetscape, landscape and building design where people's safe movement is a priority.

The WSI raised concern that the Design Excellence provisions within the Master Plan enabled variations to the maximum height limits that may conflict with requirements to protect airspace operations in proximity to the airport.

The TAP Letter of Advice to the Secretary of the Department, dated 17 August 2023, noted that the Proponent was still working with GANSW to finalise its Design Excellence Strategy.

The Government Architect NSW (GANSW) supported the general approach for setting triggers for Design Excellence mechanisms coupled with a place-based approach to competitions and design review. It provided advice to the proponent to simplify parts of the Design Excellence Strategy and improve consideration of design excellence.

Response to Submissions

In response the proponent made changes to its Design Excellence Strategy including:

- Rationalising the design competition provisions of the Western Parkland City SEPP which applies to development over 40m (i.e. 12 storeys), and would otherwise generate numerous design competitions in the City Centre, by taking a tiered and more manageable approach, where design competitions would only apply where buildings are over 55m (note: the maximum height of buildings in the City Centre is 60m), or Landmark and Gateway buildings or public buildings, consistent with the approach in other City Centres including Parramatta LGA.
- Adopting the design excellence provisions from Section 4.33 of the Western Parkland City SEPP.
- Clarifying provisions to address WSI concerns.
- Requiring Moore Gully/Thompsons Creek open space to be subject to review by the State Design Review Panel

The proponent noted that it is preparing a Public Domain Strategy to detail such matters as pavement treatments, landscaping, and street furniture to ensure a consistent approach across the City Centre.

Department's consideration

The Department considers that the proposed Design Excellence Strategy, as amended, provides a rational approach for consideration of design excellence and sets out clear criteria for buildings subject to a competitive design process.

The Department is also satisfied that all submissions have been adequately addressed through the RtS. The Design Excellence Strategy has incorporated all of the recommendations of GANSW where possible, with the final text agreed on by GANSW.

The Department considers that the Design Excellence Strategy meets the requirements of section 4.30(2) of the Western Parkland City SEPP.

In addition to the Design Excellence Strategy the Master Plan contains development controls for built form and building design, the street network, the public domain and public open space ensuring an integrated design approach for the city centre.

6.2 Flood management and risk

The Moore Gully and Thompsons Creek riparian corridors are located within the south of the site. These waterways connect to the broader Wianamatta South Creek catchment. The Flood Impact Assessment (FIA) exhibited with the Master Plan provided an assessment of the flood characteristics of these two waterways under existing and proposed developed conditions during a 1% Annual Exceedance Probability (AEP) event.

The FIA concluded that limited off-site flood impacts would occur as a result of the proposed development and any impacts would be contained within land reserved for open space and drainage.

Submissions

The SES, DCCEEW and SINSW commented that the FIA did not consider the full range of flooding scenarios. It was recommended that the FIA be updated to a Flood Impact and Risk Assessment (FIRA) to identify and address risks to existing and future development including post-development flood behaviour risks.

SINSW commented that future school sites must sit above the Probable Maximum Flood Level.

Response to submissions

In response the proponent provided an updated FIRA, consistent with the Flood Risk Management Guide LU01, that assessed flooding and risks during the 1% AEP storm, the 1 in 500 AEP storm and the Probable Maximum Flood (PMF).

The FIRA found that under post-development conditions:

- There is minimal warning time for flood events for the city centre, with flood peaks expected to be reached within 2 hours of the onset of rainfall.
- Development areas to the north of Moore Gully are not predicted to be inundated by flooding from Moore Gully or Thompsons Creek in events up to and including the PMF. Flooding from stormwater will generally be confined to roadways with higher hazard areas able to be mitigated through the stormwater drainage network and ensuring ground floor levels and basement entries are set above the PMF extent.
- For development areas to the south of Moore Gully, flooding during the 1 in 500 AEP event will only cause shallow inundation. However during the PMF some parts of this area are predicted to experience hazardous (H5) flood conditions caused by flood depths exceeding 1.5 metres and flow velocities exceeding 2.0 m/s, see **Figure 12** for the post-development Flood Hazard Map During the PMF.
- The risk to life and property can be effectively mitigated through the adoption of suitable flood emergency response and evacuation strategies and the implementation of appropriate landform

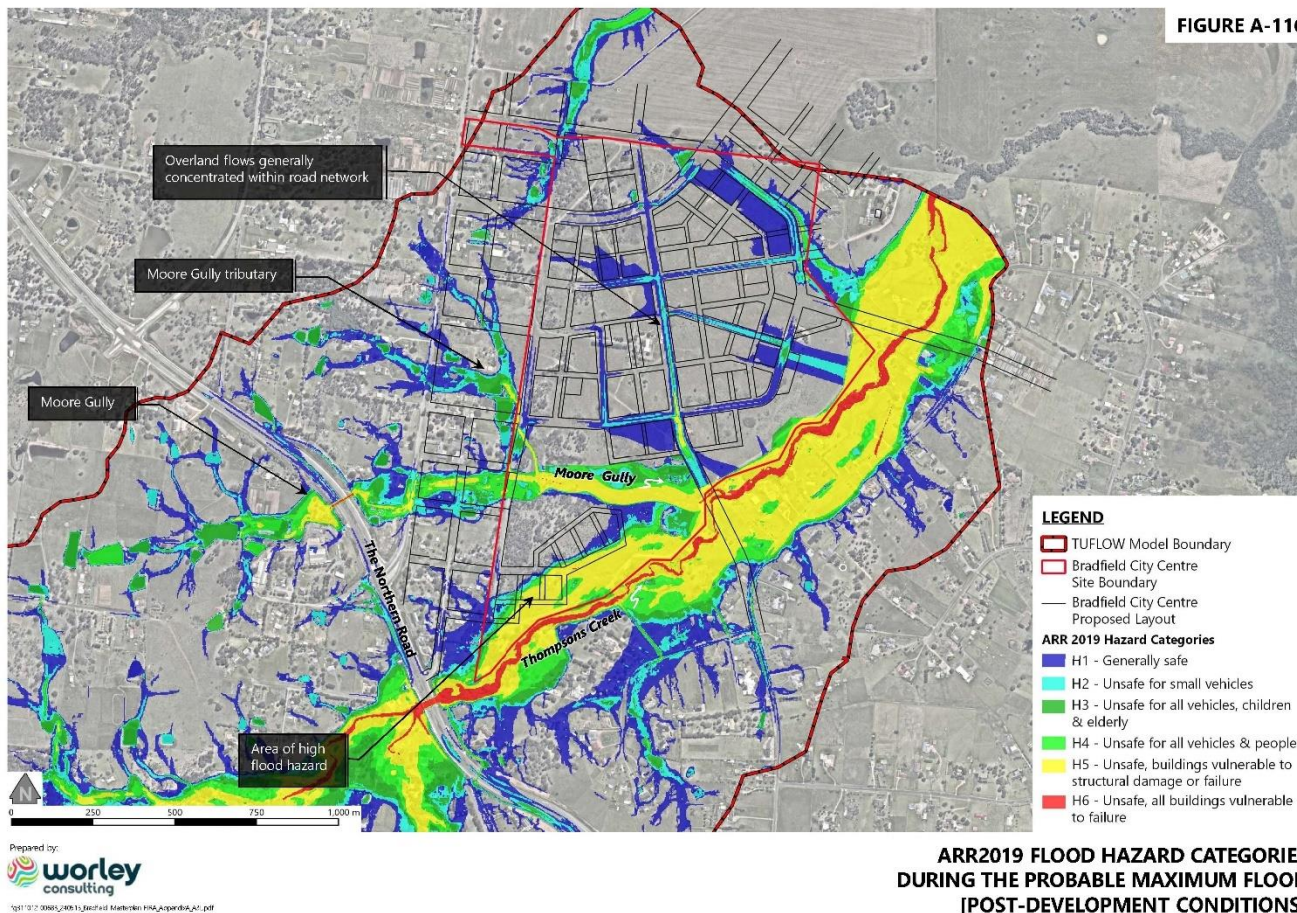
and building design. It was noted that any land forming earthworks should be designed to avoid increasing flood levels and flow velocities in off-site areas.

On review of the updated FIRA, the SES recommended that any future development should take a constraints-based approach, supported by an updated FIRA and rising road access out of flooding be provided for development that is inundated during the PMF event.

DCCEEW highlighted that the emergency response and evacuation strategies proposed in the FIRA for future development south of Moore Gully were not practical or feasible due to the flash flooding nature of the catchment. DCCEEW saw it as a priority to implement the recommendation in the FIRA to improve water flow through Moore Gully, in order to reduce the future flood hazard.

In responding to the recommendations of the FIRA the proponent stated that:

- It had reduced the flood risk by proposing a smaller developable area in the floodplain south of Moore Gully than that indicated in the Precinct Plan and removed Special Infrastructure and Education land uses nominated in the Precinct Plan from areas with the potential to be impacted by flooding
- An additional control prohibiting ground floor residential in areas impacted by the PMF has been inserted into the revised Master Plan
- Future detailed landform design will mitigate flood impact and risk.
- Evacuation routes can be readily provided and shelter in place strategies can be incorporated into future developments and assessed as part of a future application.



ARR2019 FLOOD HAZARD CATEGORIES DURING THE PROBABLE MAXIMUM FLOOD [POST-DEVELOPMENT CONDITIONS]

Figure 6 | Flood Hazard Map During the PMF (Post-development conditions)

Department’s consideration

The Department has carefully considered the findings of the FIRA, the advice provided by the DCCEEW, SES and SINSW and the proponent’s Response to Submissions, including an updated statutory assessment against the requirements of the DCP.

The Department is generally satisfied that the development of the city centre will not lead to significant off-site flood impacts. It is also satisfied that within the city centre north of Moore Gully flood impacts up to and including the PMF can be effectively mitigated by adopting the recommendations of the FIRA.

The Department raised concerns with the proponent about the flood risk during a PMF event to the future community within the Stage 4 development area to the south of Moore Gully, and requested that the proponent provide annotation on the Master Plan stating:

Land to the south of Moore Gully requires further investigation and detailed design to mitigate flood impact and risk prior to submission of any development application for that land.

The Department further considers that modelling to determine an appropriate landform and development extent for this part of the site should be undertaken prior to the first five yearly review of the Master Plan, and before submission of any development application for that land, so that the need for the annotation or the urban structure can be reconsidered.

On this basis, the Department concludes that the Master Plan is acceptable as future development would be designed to address flooding impact and mitigate risks. The Department is satisfied that the flooding risks associated with land south of Moore Gully can be mitigated through further investigation and design, which has been recognised in the amended Master Plan.

6.3 Affordable housing

The Master Plan's Housing Strategy acknowledges that a proportion of residential dwellings developed on the site will be affordable housing in accordance with NSW Government policy. However, it does not set a clear target for affordable housing.

Submissions

Liverpool City Council recommended that a clear target be set for affordable housing. The Parks NSW recommended that a 30% affordable housing target be provided within the Master Plan. Four public submissions raised concerns about the lack of an affordable housing strategy and targets and mechanisms to secure minimum social or affordable housing provision.

Response to submissions

In its RtS and updated Master Plan, the proponent included an additional control which requires affordable housing to be provided in future residential developments in accordance with current NSW Government policies and targets.

The proponent notes its approach enables flexibility to deliver a percentage of affordable housing contemporary to Government policy at the time, which may change and evolve over the period through which the City Centre is delivered. Bradfield is publicly owned land and will be strategically divested and utilised to drive Government's policy outcomes, including affordable housing.

The proponent has also noted BDA's commitment to the provision of affordable housing in the Bradfield City Centre is demonstrated through the first land release of 4.8 hectares, in which the Expression of Interest (EOI) put to the market in April 2024 requires a minimum 1,000 homes with 30% affordable housing.

Department's consideration

Increasing the supply of social and affordable housing for low-income households and essential workers is a key priority for the NSW Government. Liverpool City Council's Local Housing Strategy

has estimated that by 2036 there will be a demand for approximately 23,000 social and affordable housing dwellings in the Liverpool LGA.

Dwellings in the City Centre will have good access to public transport and nearby employment and recreational facilities. The Department considers it important that a certain level of affordable housing be provided within the City Centre so that households on very low to moderate incomes can also have access to these opportunities.

The Department acknowledges that the Aerotropolis planning framework does not specify a level of affordable housing. The Department also notes that the proponent's recent EOI for its first Superlot divestment demonstrates preparedness to incorporate affordable housing requirements. However, the Department is concerned that the proposed approach does not provide sufficient certainty for an adequate minimum supply of affordable housing over the life of the project.

The Department considers that the Master Plan should promote and ensure the adequate provision of affordable housing in the city centre and give greater certainty by specifying a minimum level. In this regard, a minimum control of 10% is considered reasonable noting it:

- Ensures the development of the City Centre contributes to meeting projected affordable housing demand in the Liverpool LGA over the life of the project.
- Is consistent with the minimum affordable housing levels applied to other planning policy initiatives to boost affordable housing in accessible areas (such as the recent Housing SEPP reforms).

Therefore, to provide certainty that an adequate minimum level of affordable housing will be provided, the Department recommends that a condition be placed on the Master Plan approval to amend the affordable housing control to ensure that future residential development includes affordable housing at a rate no less than 10% or in line with current NSW Government policy, whichever is the greater. The Master Plan control will guide future development proposals and form a matter for consideration by a consent authority under s4.42 of WPC SEPP in the assessment of development applications.

6.4 Complying development

Under the Western Parkland City SEPP master plans must contain complying development provisions. The exhibited Master Plan proposed to allow change of use for specified purposes, permitted in the respective zone, in relation to an existing approved building on land in the Mixed Use Zone or the Enterprise Zone in Bradfield City Centre as complying development subject to the development standards set out in the Master Plan.

The Department reviewed the proposed change of use complying development provisions and recommended amendments to improve legibility and ensure appropriate requirements, definitions, standards and conditions were included.

Submissions

No concerns were raised during exhibition on the proposed complying development provisions. Sydney Water advised that future complying development would likely require a Sydney Water Section 73 certificate depending on the proposed change of use.

Response to Submissions

As part of the Proponent's Response to Submissions, the proposed complying development provisions have been refined. Complying development provisions relating to a change of use to already approved commercial and industrial buildings in the Master Plan have been amended to clarify that the provisions do not include external or internal additions or alterations and to include all relevant provisions from the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* (Codes SEPP).

In addressing Sydney Water's comment, a note was included to the conditions schedule of the Bradfield City Centre Complying Development Code stating that: *In addition to the requirements specified for complying development under this Master Plan, adjoining owners' property rights, applicable common law and other legislative requirements for approvals, licences, permits and authorities still apply.*

Department's consideration

The Master Plan proposes complying development provisions limited to development involving the change of use of an existing approved building for a specified purpose on land in the Mixed Use or Enterprise Zone (but not any associated external or internal additions or alterations). These provisions are in addition to complying development provisions of the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* which apply generally to the Western Sydney Aerotropolis as set out in Part 4.6 of the Western Parkland City SEPP.

The Department considers the complying development provisions will provide an additional and streamlined planning pathway for change of use development within approved buildings, enabling uses to adapt as the city grows. The Department is satisfied the proposed complying development provisions within the Master Plan are consistent with Section 4.41 of the Western Parkland City SEPP, in that they specify the development that may be carried out as complying development within the Mixed Use and Enterprise Zones, they contain development controls for the complying development, and they have been prepared in accordance with the Master Plan Requirements.

6.5 Precinct Plan amendments

The Master Plan Guidelines state that master plans provide a mechanism to amend the Precinct Plan to achieve a superior planning outcome while remaining generally consistent with the principles of the Aerotropolis planning framework.

The Master Plan proposes amendments to several of the figures in the Precinct Plan to reflect the design of the Master Plan. It also proposes a limited number of mapping changes outside the site boundary to reduce acquisition requirements and enable more efficient transport outcomes.

The figures proposed to be amended include:

- Street Hierarchy
- Land Use and Structure Plan
- Blue-Green Infrastructure Framework
- Total Water Cycle Management
- Transport Network
- Active Transport Network
- Design Competitions

The proposed amendments were the subject of TAP consideration. The TAP letter of advice noted that the changes to the Precinct Plan will allow for an enhanced parkland city identity, increase diversity in land use for housing and jobs resulting in greater vibrancy, improved opportunity for stormwater quality and management, improved modal split, and transport network.

Department's consideration

In its assessment of the proposed amendments, the Department has considered all public, state agency and council submissions, the proponent's RtS and the relevant objectives and requirements of the Precinct Plan. Overall, the Department concludes that the proposed amendments have planning merit and meet the relevant objectives of the Precinct Plan. Detailed assessment of the amendments is provided in **Appendix E**.

6.6 Variations to DCP controls

The Western Sydney Aerotropolis DCP applies to development within the Bradfield City Centre. The Master Plan proposes:

- Alternative benchmark solutions to those set out in the DCP, and
- Additional development controls specifically designed for the city centre.

The DCP takes a performance-based approach, by providing objectives, performance outcomes and benchmark solutions. Where the Master Plan has proposed alternative benchmark solutions, these have been assessed for consistency against the objectives and performance outcomes listed in the DCP. Additional controls, specific to the Master Plan, have been assessed for consistency with the vision and objectives of the Master Plan and if relevant, objectives of the DCP.

The Master Plan includes controls to guide land use and built form (e.g height of buildings, floor space distribution, street setbacks), general development controls (e.g canopy cover and deep soils, water sensitive urban design, public art), street network and design, conceptual designs for public domain and open space and recommendations for social and cultural infrastructure.

The proposed DCP alternative solutions and additional controls were the subject of TAP consideration. The TAP letter of advice noted the changes to the DCP are required to assist the planning and urban design outcomes required for a 21st century city.

Department's consideration

In its assessment of the proposed amendments, the Department has considered all submissions, the proponent's RtS and the relevant objectives and performance outcomes of the DCP. Overall, the Department is satisfied that the proposed alternative benchmark solutions and additional controls are appropriate to guide development within a new city centre and are generally consistent with the relevant objectives and performance outcomes of the DCP. Detailed assessment of the alternative solutions is provided in **Appendix F**.

6.7 Western Parkland City SEPP amendment

6.7.1 Exempt development

The exhibited proposal included amending the Western Parkland City SEPP to include site-specific exempt development provisions to treat temporary major event uses in the Regional Parklands on the site in a similar way as major events held at Darling Harbour or The Rocks.

Submissions

Greater Sydney Parklands supported the proposal, while raising the need to address amenity impacts of major events.

The WSI commented that appropriate mitigation measures to minimise wildlife attraction would need to be considered for the future major events to be held in public open spaces.

The Department reviewed the provisions and raised a number of aspects requiring clarification and additional justification.

Response to submissions

In its RtS, the proponent advised that it is no longer pursuing the amendment to the Western Parkland City SEPP to include site-specific exempt development provisions.

Department's consideration

The Department notes the withdrawal of this aspect of the proposal. The proponent advised the Department it would be some years before development of the events space occurs and it would revisit the exempt development proposition after it had further considered how best to address the issues raised in submissions and advice from the Department.

6.7.2 Land Reservation Acquisition Map

The proposal amends the Western Parkland City SEPP Land Reservation Acquisition Map to reflect the proposed locations of open space and stormwater management infrastructure and regional park as set out in the Master Plan. The proposed redistributions are shown in **Figure 13**.

Submissions

Greater Sydney Parklands (GSP) provided a comment in relation to exploring options to ensure larger more contiguous areas of open space are delivered in the south-east corner of the site.

No objections to the proposed amendment to the Land Reservation Acquisition Map were received from either Sydney Water or Liverpool City Council as relevant acquisition authorities.

Response to submissions

The proponent responded to GSP's comments by stating that the Master Plan is not proposing to modify the regional park boundaries on the Western Parkland City SEPP - Land Reservation Acquisition Map.

Department's consideration

The Department notes that the EIE states that there will be a slight decrease in land reserved for regional park however, overall there will be no net loss across the 35.8 ha of land reserved for public purposes. The Department supports the amendment to the Land Reservation Acquisition Map as it reflects an improved layout for stormwater infrastructure, provides greater protection and connectivity for the Environment and Recreation zoned land in Ridge Park and provides increased open space and amenity for future residential development in the south of the site. It is noted that the proponent is working with the GSP on a management framework for the regional park along Thompsons Creek.

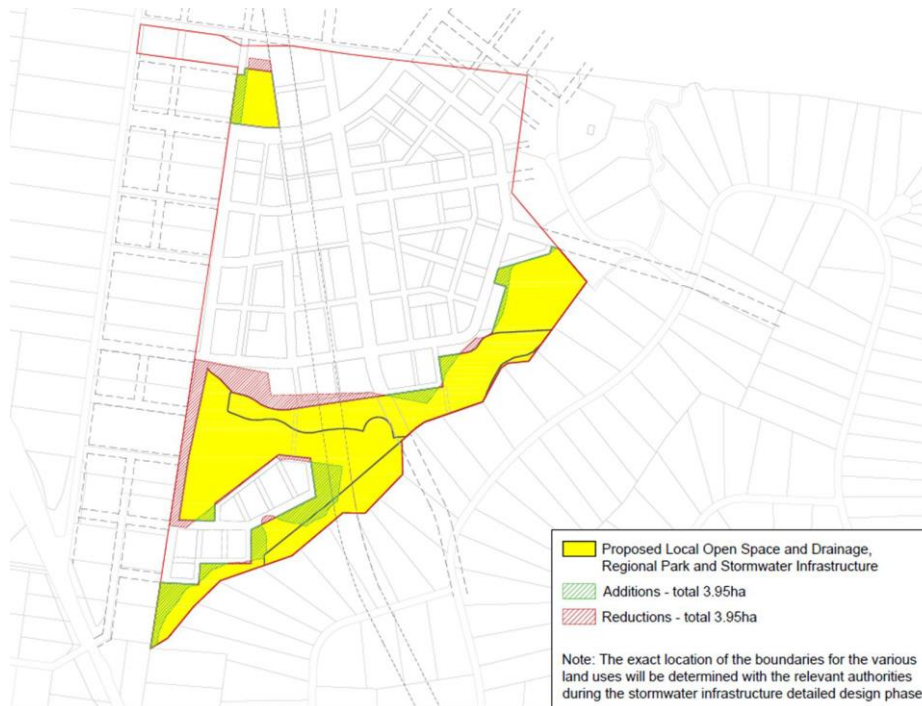


Figure 13 | Proposed changes to the Western Parkland City SEPP Land Reservation and Acquisition Map.

6.8 Other issues

The Department’s consideration of other issues raised in submissions is summarised in Table 12.

Table 12 | Assessment of other issues

Issue	Findings and conclusions
<p>Neighbour access and streets</p>	<p>The Master Plan proposes a different street and block structure to that set out in the Precinct Plan.</p> <p>Two public submissions raised concern that changes to road alignments and connections along the northern and north-eastern boundary of the site would impact development potential of their sites.</p> <p>In its RtS the proponent revised its street layout along the affected neighbouring interfaces by reinstating the indicative local roads as shown in the Precinct Plan.</p> <p>The Department supports this revision and considers it an improved planning outcome and that it adequately resolves the issues raised.</p>
<p>Biodiversity</p>	<p>The Master Plan proposes development within areas of the site that contain trees and native vegetation and also proposes realigning and restoring parts of Moore Gully.</p>

Issue	Findings and conclusions
	<p>The Master Plan was accompanied and informed by a Biodiversity Strategy and Impact Assessment (BSIA) report which identifies the ecological values within the Master Plan area, impacts associated with the Master Plan and recommendations to avoid, mitigate and offset impacts to biodiversity. It identified that all impacts on native vegetation and threatened flora and fauna are restricted to areas which have been granted biodiversity certification.</p> <p>Liverpool City Council’s submission commented on the insufficient details on impacts to ENZ zoned areas and the realignment of Moore Gully.</p> <p>DCCEEW requested additional information and assessment regarding potential direct and indirect impacts to existing biodiversity, riparian corridors and ENZ Zones including confirmation on whether the endangered Elderslie Banksia Scrub Forest ecological community (EBSF) is present within the Master Plan site and details on the location of the endangered population of <i>Marsdenia viridiflora subsp. Viridiflora</i> (Marsdenia).</p> <p>Additional field investigations confirmed EBSF is not present. Approximately 12 individuals of Marsdenia were recorded within the site. This area is categorised as open space and is not expected to be impacted. The proponent advised potential impacts to biodiversity, the riparian corridor of Moore Gully, key fish habitat and ENZ Zoned land would be addressed in future development applications. The proponent noted the site is within a bio-certified area.</p> <p>In response to the RtS DCCEEW maintained its concern that the 6.19 ha of Existing Native Vegetation (ENV) proposed to be conserved under the Master Plan may be compromised by numerous encroachments.</p> <p>The Department is satisfied the issues raised have been adequately addressed in the proponent’s RtS and amended BSIA. Detailed assessment of indirect impacts to ENZ Zoned land and ENV will need to be considered during a future approval process. Impacts in relation to the proposed Moore Gully realignment will also need to be addressed during a future approval process.</p> <p>The development footprint of the Master Plan is confined to areas mapped as certified under the Growth Centres Biodiversity Certification Order. As such further assessment of impacts to threatened entities is not required. Future development proposals will need to demonstrate how ENV will be conserved in line with the proponent’s commitment under the Master Plan.</p>
<p>Infrastructure delivery and Public Benefits</p>	<p>Liverpool City Council, Penrith City Council and The Parks NSW – Sydney’s Parkland Councils raised concerns regarding the lack of detail on timing, delivery</p>

Issue	Findings and conclusions
	<p>and funding of proposed infrastructure, investment coordination and optimisation, infrastructure locations and funding commitments for the Bradfield City Centre.</p> <p>UDIA and the adjoining landowner at 40 The Retreat requested clarity on the delivery and construction phase and recommends the proponent provide a clearer scope of the development sequencing and timing.</p> <p>The delivery of infrastructure and the intended staging for the delivery of the Bradfield City Centre has been considered in the Infrastructure Delivery Strategy accompanying the Master Plan. In its RtS the proponent has committed to preparing a Planning Agreement with the Minister for Planning and Public Spaces which will identify the infrastructure to be delivered in Stage 1 of the Master Plan delivery program. It noted that it will continue to work with relevant State agencies and council to determine the appropriate location and timing of delivery of social, community, health and school infrastructure.</p> <p>The Department acknowledges that locations for infrastructure, timing and delivery are subject to further discussion and dependent on many factors such as funding, divestment, and market conditions.. The Department is satisfied that the principles for planning social infrastructure have been met and the proponent’s commitment to ongoing consultation with the relevant authorities will ensure that appropriate infrastructure is delivered to meet the community’s needs.</p>
Smart Cities	<p>The Master Plan was accompanied by a Smart Cities Implementation Plan and Assessment Report which articulates the smart cities vision for Bradfield City Centre.</p> <p>The Liverpool City Council submission noted the lack of detail to support the Smart City goals within Bradfield City Centre.</p> <p>The proponent stated that smart cities details are beyond the scope of the Master Plan.</p> <p>The Department is satisfied that future development within Bradfield City Centre will need to address the DCP requirement to consider the NSW Smart Places Strategy and Smart Western City Program.</p>
Privacy concerns	<p>Submissions from the community raised concerns that the proposal for a Smart City/30-minute city would compromise people’s freedom and privacy.</p> <p>In its response to submissions the proponent noted the concerns raised by the community and has modified language in the Master Plan to recognise this issue.</p> <p>The Department notes that privacy protection requirements will need to be addressed as part of future development within Bradfield City Centre when</p>

Issue	Findings and conclusions
	<p>addressing the DCP requirement to consider the NSW Smart Places Strategy and Smart Western City Program.</p>
<p>Stormwater quality and quantity impacts</p>	<p>Public and agency submissions commented on the Master Plan’s stormwater impacts and mitigation measures and the lack of functional design drawings and need to minimise wildlife attraction.</p> <p>The proponent notes stormwater catchments within the Bradfield City Centre have been designed to drain into the Regional Stormwater Basins for detention and treatment prior to being discharged into Moore Gully and Thompsons Creek. Detailed design is subject to discussion with Sydney Water and WSIA. The Master Plan can achieve Stormwater, Water Sensitive Urban Design, and Integrated Water Management objectives and requirements contained within the Western Sydney Aerotropolis DCP. Two stormwater precincts will drain into adjoining land, which has been identified as land to be acquired for drainage purposes under the SEPP.</p> <p>In its response to the RtS DCCEEW reiterated its request for further information to address its concerns about removal of Strahler Order 1 watercourses, the functionality of the bioretention system and impacts outside the site.</p> <p>The Department is satisfied that with further detailed design the Master Plan site will be able to meet Sydney Water, WSIA and DCP requirements for stormwater management and waterway health and wildlife attraction mitigation. Further assessment on proposed DCP variations can be found in Appendix F.</p>
<p>Height and Density</p>	<p>Submissions from both the UDIA and Urban Taskforce recommended that maximum permissible heights and FSR be increased within the city centre. The UDIA noted that greater employment, residential and investment capacity will allow access to skilled jobs and opportunities within close proximity to homes.</p> <p>The proponent noted that height and FSR controls for the city centre are set by the Precinct Plan and amendments to these controls are not proposed. The Master Plan provides for heights in accordance with the maximum HOB and Obstacle Limitation Surface Map stipulated under the Western Parkland City SEPP and Precinct Plan.</p> <p>The Department considers that the current height and FSR controls are appropriate for the city centre and respond to the airspace operations protection requirements under the Western Parkland City SEPP.</p>

Issue	Findings and conclusions
<p>Public Transport and Connectivity</p>	<p>Submissions received from the community and special interest groups recommended that the frequency of public transport services be increased and transport connectivity to the wider Western Parkland City be prioritised.</p> <p>The proponent noted that the Transport Infrastructure Corridor will be retained and preserved for future transport links and that transport connections beyond the site are not within scope for the Master Plan.</p> <p>The Department considers that the Bradfield City Centre Master Plan Transport Management Accessibility Plan (TMAP) addresses planning for transport, traffic, parking, and connectivity to Bradfield City Centre from other parts of Western Parkland City and Greater Sydney.</p>
<p>Heritage - 'Kelvin' State Heritage Item</p>	<p>Heritage NSW considered Master Plan proposal will cause impacts associated with a change of character of the locality from rural to townscape and potentially long-range views to and from the listed State Heritage item 'Kelvin', located approximately 100 metres to the north-east of the Master Plan site.</p> <p>The proponent noted that future DAs will need to consider heritage requirements within the DCP.</p> <p>The Department considers that the Aerotropolis planning framework, particularly the Western Sydney Aerotropolis Plan, already provides a strategic vision for the Aerotropolis core and the City Centre. The character of the area is expected to transform into a dense urban City Centre. Future development in the vicinity of Kelvin will need to consider heritage impacts and appropriate mitigation measures in accordance with the Western Parklands City SEPP.</p>
<p>Noise and vibration</p>	<p>Submissions received from the public and government authorities noted that noise from adjoining industrial and transport (air, rail, road) land uses may impact on future residents.</p> <p>The proponent noted that future development applications will need to address the controls in the Infrastructure SEPP relating to rail corridor noise and the Development Near Rail Corridors and Busy Roads – Interim Guidelines.</p> <p>The Department notes that the site is located outside the Airport ANEC 20 contour, meaning it is suitable for all types of development, that the DCP will continue to apply in relation to noise and vibration requirements, as will the Interim Guidelines.</p> <p>The Department is satisfied that the recommendations of the Noise and Vibration Impact Assessment Report have appropriately been incorporated into the Master</p>

Issue	Findings and conclusions
	<p>Plan. The Department notes that future developments within the Master Plan area will be the subject of separate planning applications which will assess the noise and vibration impacts to residential receivers and future residents and apply suitable mitigation measures.</p>
<p>Luddenham Village Plan</p>	<p>The Department received four submissions from the community regarding the progress and status of the Luddenham Village Plan.</p> <p>The Department acknowledges concerns in relation to planning for Luddenham Village however, this is not a relevant consideration for the assessment of the proposed Master Plan.</p>
<p>Sustainability</p>	<p>The Master Plan was accompanied and informed by a Sustainability Infrastructure report which presents a masterplan-level sustainability framework for the Bradfield City Centre to ensure sustainability outcomes are implemented. The framework focuses on establishing best practice targets for net zero emissions, water, waste and heat reduction, and promotion of a circular economy.</p> <p>Submissions received from DCCEE (Sustainability), Green Building Council of Australia and the community commended the comprehensive Sustainability Report for the Master Plan and provided recommendations for additional sustainability opportunities to align with additional global rankings and targets. The EPA suggested the Circular Economy Waste Strategy could include details on the quantity, type of and the management of waste generated.</p> <p>In its response to submissions report, the proponent noted that future development will need to be consistent with the requirements of the statutory framework for sustainability and demonstrate net zero by 2030 can be achieved. The proponent also noted that the long-term circular economy strategy for the Master Plan will be refined as the site develops over time.</p> <p>The Department is satisfied that the proponent has addressed the sustainability aims of the Master Plan and considers that appropriate mechanisms to achieve sustainability targets are in place for the Bradfield City Centre.</p>
<p>Aviation Impacts</p>	<p>The Master Plan was accompanied and informed by an Aviation Impact Assessment which considers technical and policy context for effective protection and safeguarding of airport operations and lists the key implications and recommendations for the Master Plan.</p> <p>The exhibited Design Excellence Strategy in the Master Plan noted: ‘as part of the design excellence process additional height may be justified (subject to</p>

Issue	Findings and conclusions
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compliance with Procedures for Air Navigation Services – Aircraft Operations (PANS OPS)’.
 WSI advised that any proposed long-term intrusions into protected airspace will need to be separately assessed under Commonwealth legislation. Any potential impacts to protected airspace or proposed variations to heights that may intrude on protected airspace must be supported by an Aviation Impact Assessment as well as early consultation with Western Sydney Airport.
 The proponent has acknowledged the requirement for early consultation with WSI on future developments, where necessary. The note in the Design Excellence Strategy relating to additional height has been removed.
 The Bradfield City Centre is not directly impacted by aircraft noise, potential for windshear/turbulence issues, or lighting distraction to pilots, and does not pose significant restrictions on building heights due to the orientation of its proposed parallel runways and anticipated flightpaths. Under the Precinct Plan, the maximum height of buildings is 62m. The Master Plan has been designed to adopt the height limits within the Precinct Plan and the Limitation Surface Map stipulated under the Western Parkland City SEPP. The Master Plan does not propose any amendments to the Western Parkland City SEPP Obstacle Limitation Surface (OLS) Map. Rather, the Master Plan provides further guidance on the appropriate height of buildings across the city centre in finer-grained detail to ensure adequate solar access to the public domain and diversity of building heights. The Department notes that references to additional height of buildings have been removed from the Design Excellence Strategy. The Department is satisfied that the Master Plan is not in conflict with the airport operations safeguard requirements in the Western Parkland City SEPP.

<p>Solar Access and Amenity</p>	<p>Liverpool City Council raised concerns regarding the Master Plan not achieving the Precinct Plan’s 70% solar access requirements, which would have an impact on the amenity of Local Parks. The Parks NSW recommended that building heights adjacent to public open spaces be reviewed to ensure that minimal overshadowing occurs. The proposed building heights have been designed to ensure solar access is achieved and maximise solar amenity to communal and public open spaces. The Master Plan includes development controls to ensure an appropriate level of solar access is maintained to open spaces. The Master Plan proposes an alternative target of 3 hours’ solar access between 9am and 3pm on 21 June to 50% area of</p>
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Issue	Findings and conclusions
	<p>the Local Park. This is consistent with the Liverpool City Council DCP requirements for new parks in the Liverpool City Centre.</p> <p>The Department acknowledges that achieving 70% solar access at Local Parks on 21 June could significantly restrict the built form and density. The alternative target proposed of 3 hours' solar access between 9am and 3pm on 21 June to 50% area of the Local Park is considered acceptable and would maintain adequate solar access to the Local Parks, while remaining consistent with local policy and without materially impacting development potential. This control was subject to TAP consideration and endorsed by the TAP prior to lodgement. Additionally, the Master Plan provides fine-grain guidance on the appropriate height of buildings across the city centre to ensure adequate solar access to the public domain.</p>
<p>Environmental Health</p>	<p>Liverpool City Council raised concerns regarding air quality and the potential impacts from aircraft emissions on the future residential population of the Bradfield City Centre.</p> <p>The Master Plan was informed by an Air Quality Impact Assessment which considered the potential air quality impacts that may arise in the Bradfield City Centre. The key source of air emissions identified and expected as the site develops is road traffic emissions. The proponent has considered the issue raised and notes that detailed assessment of potential impacts from aircraft emissions will be undertaken at the relevant development application stage.</p> <p>The Department acknowledges the Air Quality Impact Assessment has considered the likely air quality impacts from road traffic emissions. The issues raised regarding the potential impacts from aircraft emissions are noted however, this is a matter for the operation of WSI and its measures to mitigate aircraft emissions on surrounding land uses. The Department is satisfied that the Master Plan will not have any adverse impacts to environmental health.</p>
<p>Public Art</p>	<p>The Master Plan was accompanied and informed by an Arts and Culture Strategy to enhance the quality of public spaces, celebrate local character, create a sense of place identity through art and cultural programs, identify priority projects and recommend a structure for ongoing implementation.</p> <p>Liverpool City Council provided a number of recommendations to require the Arts and Culture Strategy included as part of the Master Plan to comply with the Aerotropolis DCP.</p> <p>The proponent has advised that the Arts and Culture Strategy has been prepared in accordance with the public arts requirements in the Aerotropolis DCP. This</p>

Issue	Findings and conclusions
	<p>includes prioritising First Nations artists in the region and ensuring public art is provided for all developments on sites over 20 hectares or with an estimated development cost over \$20 million. The proponent has updated the Arts and Culture Strategy to include a provision to ensure the Public Art requirements in the Aerotropolis DCP continue to apply to all future development applications.</p> <p>The Department acknowledges the matters raised have been adequately addressed in the Arts and Culture Strategy and the response to submissions report. The Master Plan includes a site-specific development control to ensure that development applications have consideration for this strategy. The Department is satisfied that the Proponent’s Arts and Culture Strategy will ensure public art is delivered in accordance with the requirements in the DCP.</p>
Transport Corridor	<p>Transport for NSW (TfNSW) and Sydney Metro provided comments on future development above or within close proximity to the transport corridor to ensure future development does not impact the transport corridor.</p> <p>The Western Parkland City SEPP includes provisions which require concurrence of TfNSW for development on transport corridor land to ensure its protection. Future development will also need to address the controls in the Infrastructure SEPP and Development Near Rail Corridors and Busy Roads guidelines to ensure that impacts are mitigated.</p> <p>The Department is satisfied that the Master Plan has adequately considered the transport corridor in its design and protection. Future developments on top of or in proximity to the corridor will need to address the relevant legislative requirements prior to any development is undertaken.</p>
Bushfire Protection	<p>A Bushfire Strategy and Impact Assessment accompanied and informed the Master Plan. The report considered the broader landscape risks and the provision of the bushfire protection measures for the Master Plan following the requirements of <i>Planning for Bush Fire Protection</i> (PBP).</p> <p>NSW Rural Fire Services provided comments and recommendations for future development within the Master Plan must comply with the requirements of relevant sections of PBP.</p> <p>The Master Plan has been prepared to respond to bushfire hazards to protect life, property, the community and minimise impacts on the environment. A Bushfire Strategy and Impact Assessment has informed the Master Plan and addressed bushfire protection across the Bradfield City Centre. Future development</p>

Issue	Findings and conclusions
	<p>applications will require a bushfire assessment in accordance with PBP and the Rural Fires Act.</p> <p>The proponent's reports indicate that Asset Protection Zones (APZs) are achievable within the Master Plan's developable area or within planned managed open space areas. The Department notes that the final location and dimension of APZs will be determined during the detailed design and development application phases.</p> <p>The Department is satisfied that the Bushfire Strategy and Impact Assessment has adequately considered the potential bushfire impacts in Bradfield and that future development applications will need to comply with the relevant requirements to ensure any potential bushfire risk is mitigated.</p>
<p>Economic Impacts</p>	<p>The Parks NSW recommended that the Master Plan reserve floor space for employment purposes and growth forecasts be reviewed to ensure employment targets are met.</p> <p>The Master Plan was accompanied by an Economic Strategy and Impact Assessment which has informed the proposed land use projections and floorspace allocations for employment land. The proponent has committed to preparing a divestment strategy which will consider and allocate suitable land uses for employment purposes. The strategy will identify the jobs capacity and supply of retail services appropriately. The Proponent has committed to reviewing the growth staging of the city centre with each 5 -yearly master plan review.</p> <p>The Department acknowledges the Proponent's commitment develop a divestment strategy to further refine floorspace required for employment purposes. The Department is satisfied that the divestment strategy will consider and deliver suitable land use mix for jobs in the Bradfield City Centre and the staging of the Master Plan will be reviewed and refined at the 5-yearly review period.</p>
<p>Circular economy</p>	<p>The EPA recommended that specific land should be identified for waste infrastructure, and preserving and protecting existing infrastructure land against future development or rezoning and the Circular Economy Waste Strategy is high-level and should address the sustainability outcomes of the Master Plan.</p> <p>The Circular Economy Waste Strategy has informed the Master Plan and includes measures to reduce waste production and collection, food organics management, community education and circular sharing initiatives for the Bradfield City Centre.</p>

Issue	Findings and conclusions
	<p>The long-term Circular Economy Strategy will adapt to site as it evolves and will be updated accordingly.</p> <p>The Proponent has committed to working with relevant stakeholders to identify land and determine an appropriate location for circular economy infrastructure. The Proponent has committed to doing this prior to the next Master Plan review in 5 years, which is acceptable. The Department is satisfied that the Circular Economy Strategy has identified potential waste streams and strategies to reduce those across the Bradfield City Centre.</p>
<p>Contamination</p>	<p>The Master Plan is supported by a number of ground condition and contamination assessments, including a detailed site investigations report. These assessments concluded the Bradfield City Centre site is and can be made suitable for the Master Plan uses. It recommended that an asbestos management plan be implemented prior to the commencement of construction works and a validation report be prepared before site occupation.</p> <p>The EPA provided general comments and noted that the site audit statement concludes the site can be made suitable for the proposed uses. The EPA also noted that where remediation works are required, a validation report must be prepared before the commencement of use.</p> <p>The Department is satisfied that the site is or can be made suitable for the land uses proposed within the Master Plan and notes that no development works are proposed. Future development will be subject to separate planning applications which will further consider site suitability and ground conditions for specific developments and proposed land uses.</p>

7 Evaluation

The Department's assessment has considered the relevant matters and objects of the EP&A Act, including the principles of ecologically sustainable development (Sections 4 & 0), advice from government agencies, local councils and public submissions (Section 5), and strategic government policies and plans (Section 4).

This includes consideration of the Master Plan (as amended), the Planning Report and technical appendices, RtS, RRFI and assessed the merits of the proposal, taking into consideration advice from public authorities and comments from Councils. Issues raised in the public submissions have also been considered and all environmental issues associated with the proposal have been thoroughly assessed.

Overall, the Department's assessment concludes the Bradfield City Centre Master Plan is acceptable as it has demonstrated consistency with the Aerotropolis planning framework, including the:

- Western Sydney Aerotropolis Plan
- Western Parkland City SEPP
- Precinct Plan
- Master Plan Guidelines and Requirements, and
- DCP

The Department considers the Master Plan to be consistent with the Aerotropolis planning framework, that statutory requirements for approval have been satisfied, community and agency views have been considered, key assessment issues have been resolved and the Master Plan establishes a superior planning outcome for the city centre.

The Department is satisfied that the issues raised by State agencies, Councils and the community have been adequately addressed by the proponent in the RtS, the Department's assessment report and the amended Master Plan, subject to a recommended condition that promotes and ensures the adequate provision of affordable housing over the life of the project.

If approved, it is expected the Master Plan will enable a new city centre for the Aerotropolis largely within 400m of the Bradfield Metro station, that will positively contribute to the wider Western Parkland City in accordance with the strategic vision set by the Western Sydney Aerotropolis Plan. Consistent with the advice from the TAP and Government Architect NSW, the Master Plan will provide key planning controls ensuring future built form and the public domain will exhibit design excellence and provide active and sustainable city spaces.

The design of the Master Plan has been informed by Connecting with Country principles and ongoing Aboriginal engagement. The Master Plan has taken a landscape led approach, providing a blue-green infrastructure framework for the site, including over 30 ha of new green space that connects along Thompsons Creek to the wider Aerotropolis.

The Bradfield City Centre Master Plan is a key component in achieving the vision of the Western Sydney Aerotropolis Plan to create an accessible, innovative and connected city with great places as it will have the capacity to:

- Deliver up to 10,000 residential apartments
- Generate up to 24,000 jobs by 2056
- Supply 2,316,000 sqm GFA within its Mixed Use Zone, and
- Provide 38.5 hectares of open space

As such, the Department considers that the project is in the public interest and is recommended for approval.

8 Recommendation

It is recommended that the Minister for Planning and Public Spaces:

- **considers** the findings and recommendations of this report
- **accepts and adopts** the findings and recommendations in this report as the reasons for making the decision to grant conditional approval to the master plan application
- **grants approval** to the Bradfield City Centre Master Plan (WSA_MP02) under section 4.41 of the Western Parkland City SEPP and publishing on the NSW planning portal.
- **grants approval** to the amended Western Sydney Aerotropolis Precinct Plan, prepared by the Department to reflect the Master Plan, under section 4.38 of the Western Parkland City SEPP and publishing on the NSW planning portal
- **note** that an amendment to Western Sydney Aerotropolis DCP to incorporate the master plan will be determined under delegation from the Secretary
- **note** that the amendment to the Western Parkland City SEPP Land Reservation Acquisition Map will be determined under delegation
- **signs** the attached instruments of approval (Error! Reference source not found.).

Recommended by:

Fadi Shakir
Senior Planning Officer
Regional Assessments

Recommended by:

Stuart Withington
Team Leader
Regional Assessments

Recommended by:

Louise Densmore
Acting Director
Regional Assessments

Recommended by:

Ben Lusher
Acting Executive Director
Housing and Key Sites Assessments

Glossary

Abbreviation	Definition
AHD	Australian height datum
DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
BDA	Bradfield Development Authority, formerly known as Western Parkland City Authority (WPCA)
Council	Liverpool City Council
DCP	Western Sydney Aerotropolis Development Control Plan 2022
Department	Department of Planning, Housing and Infrastructure
EDC	Estimated Development Cost
EPA	NSW Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental planning instrument
ESD	Ecologically sustainable development
Heritage	Heritage NSW, within the NSW Department of Climate Change, Energy, the Environment and Water
LEP	Local environmental plan
Master Plan	Bradfield City Centre Master Plan
Minister	Minister for Planning and Public Spaces
Precinct Plan	Western Sydney Aerotropolis Precinct Plan

Abbreviation	Definition
Proponent	Bradfield Development Authority, formerly known as Western Parkland City Authority (WPCA)
Secretary	Secretary of the Department of Planning, Housing and Infrastructure
SEPP	State environmental planning policy
TfNSW	Transport for NSW
Western Parkland City SEPP	State Environmental Planning Policy (Precincts—Western Parkland City) 2021

Appendices

Appendix A List of referenced documents

Appendix B Submissions and government agency advice

Appendix C Strategic considerations

Appendix D Statutory considerations

Appendix E Amendments to Precinct Plan

Appendix F Variations to DCP controls

Appendix G TAP Letter of Advice to Secretary

Appendix H Master Plan Requirements

Appendix I Instruments of Approval