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Bradfield Development Authority

Bradfield City Centre
Master Plan Application

Response to Submissions Report

July 2024



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Acknowledgement of Country

Aboriginal people have had a continuous connection with the Country encompassed by the Western Parkland City (the Parkland City) from time immemorial. They have cared for Country and lived in deep alignment with this important landscape, sharing and practicing culture while using it as a space for movement and trade.

We Acknowledge that four groups have primary custodial care obligations for the area: Dharug/Darug, Dharawal/Tharawal, Gundungurra/Gundungara and Darkinjung. We also Acknowledge others who have passed through this Country for trade and care purposes: Coastal Sydney people, Wiradjuri and Yuin.

Western Sydney is home to the highest number of Aboriginal people in any region in Australia. Diverse, strong and connected Aboriginal communities have established their families in this area over generations, even if their connection to Country exists elsewhere. This offers an important opportunity for the future of the Parkland City.

Ensuring that Aboriginal communities, their culture and obligations for Country are considered and promoted will be vital for the future of the Parkland City. A unique opportunity exists to establish a platform for two-way knowledge sharing, to elevate Country and to learn from cultural practices that will create a truly unique and vibrant place for all.



Garungarung Murri Murri Nuru
(Beautiful Grass Country)

Artwork created by Dalmarrri artists Jason Douglas and Trevor Eastwood for the Bradfield Development Authority

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1 Introduction

This Response to Submissions Report (RtS) has been prepared by FPD Planning, on behalf of the Bradfield Development Authority (BDA) in support of the Master Plan Application for Bradfield City Centre.

The Bradfield City Centre Masterplan was exhibited from Monday 5 February 2024 to Monday 4 March 2024. A total of 82 submissions were received comprising of:

- 3 submissions from local councils
- 1 submission from The Parks Council (a regional organisation of local councils in the Western Parkland City)
- 14 Submissions from State Government Agencies
- 10 submissions from organisations and interest groups
- 54 submissions from individual community members.

The submissions received are detailed in **Table 1** below.

Table 1 Breakdown of submissions

Submission Category	Submission Group/Person	Community Interest Level	Submission Type
Government Agencies	Council – Liverpool Council		Comment
	Council – Penrith City Council		Comment
	Council – Wollondilly Shire Council		Comment
	Water NSW		Comment
	NSW Rural Fire Service		Comment
	Department of Primary Industries		Comment
	Sydney Metro		Comment
	Transport for NSW		Comment
	NSW Environmental Protection Authority		Comment
	The Parks NSW		Comment
	NSW State Emergency Service		Comment
	Department of Climate Change, Environment and Water		Comment
	Greater Sydney Parklands		Comment
	Western Sydney Airport		Comment
	Heritage NSW		Comment
	Sydney Water		Comment
Endeavour Energy		Comment	
Department of Education		Comment	
Organisation and Interest Groups	Urban Taskforce		Comment
	Action for Public Transport NSW		Comment
	Centre for Western Sydney, Western Sydney University		Comment
	Committee for Sydney		Comment
	Community Housing Industry Association		Comment
	Green Building Council of Australia		Comment
	Shelter NSW		Objection
	Urban Development Institute of Australia		Comment

Submission Category	Submission Group/Person	Community Interest Level	Submission Type
	Western Sydney University		Support
	Endeavour Energy		Comment
Public Submissions	Chris Papadopoulos, 2196	Regional (5-100km from the site)	Support
	Name withheld, 2211	Regional (5-100km from the site)	Support
	Doug McIntyre, 2583	Broader community interest (>100km from the site)	Support
	Shant Ohannessian, 2115	Regional (5-100km from the site)	Support
	Name withheld, Kemps Creek	Regional (5-100km from the site)	Support
	Name withheld, Bossley Park	Regional (5-100km from the site)	Comment
	Name withheld, Canberra	Broader community interest (>100km from the site)	Objection
	Jor Boogaart, Sydney	Regional (5-100km from the site)	Objection
	Name withheld, 2137	Regional (5-100km from the site)	Objection
	Name withheld, 4221	Broader community interest (>100km from the site)	Objection
	Name withheld, 6011	Broader community interest (>100km from the site)	Objection
	Name withheld, Bundaberg	Broader community interest (>100km from the site)	Objection
	Michelle Horsley, WA	Broader community interest (>100km from the site)	Objection
	Name withheld, Lurnea	Regional (5-100km from the site)	Objection
	Name withheld, Hillsdale	Regional (5-100km from the site)	Objection
	Louanna De Vrie, 2000	Regional (5-100km from the site)	Objection
	Name withheld, Sydney	Regional (5-100km from the site)	Objection
	Carrol Wallace, Bowen 4805	Broader community interest (>100km from the site)	Objection
	Name withheld, 2752	Regional (5-100km from the site)	Objection
	Name withheld, 2642	Broader community interest (>100km from the site)	Objection
	Alex Trezise, 2034	Regional (5-100km from the site)	Objection
	Kurt Grieve, Rouse Hill	Regional (5-100km from the site)	Support
	Jonathan Ward, West Pymble 2073	Regional (5-100km from the site)	Support
	Name withheld, 2586	Broader community interest (>100km from the site)	Objection
	Name withheld, Manly Vale 2093	Regional (5-100km from the site)	Objection
	Name withheld, 2000	Regional (5-100km from the site)	Objection
	Joanna Carroll, Woodford	Regional (5-100km from the site)	Objection
	Name withheld, Camden Park 2570	Regional (5-100km from the site)	Comment
	Brad Mock, Bradfield 2556	Local (<5km from site)	Objection
	Name withheld, 2316	Broader community interest (>100km from the site)	Objection
	Name withheld, 2560	Regional (5-100km from the site)	Objection
	Name withheld, Rosebery 7470	Broader community interest (>100km from the site)	Objection
	Name withheld, Umina 2257	Broader community interest (>100km from the site)	Objection
	Name withheld, Newcastle	Broader community interest (>100km from the site)	Objection

Submission Category	Submission Group/Person	Community Interest Level	Submission Type
	Name withheld, Porepunkah 3740	Broader community interest (>100km from the site)	Objection
	Name withheld, Moss Vale 2577	Regional (5-100km from the site)	Objection
	Name withheld, 2283	Broader community interest (>100km from the site)	Objection
	Name withheld, Lane Cove	Regional (5-100km from the site)	Objection
	Bruce George, Mogilla 2550	Broader community interest (>100km from the site)	Comment
	Name withheld, 3099	Broader community interest (>100km from the site)	Objection
	Name withheld, 2259	Broader community interest (>100km from the site)	Objection
	Name withheld, 2720	Broader community interest (>100km from the site)	Objection
	Name withheld, 2283	Broader community interest (>100km from the site)	Objection
	Bateer Hasi, Tokyo 160-0023, Japan	International	Comment
	Daniel Howard Ethos Urban co/SCG, 2000	Regional (5-100km from the site)	Objection
	Mary Brownlee, 2567	Regional (5-100km from the site)	Objection
	Name withheld, 2000	Regional (5-100km from the site)	Comment
	Name withheld, Luddenham 2745	Regional (5-100km from the site)	Comment
	Name withheld, 2000	Regional (5-100km from the site)	Objection
	Name withheld, Luddenham 2745	Regional (5-100km from the site)	Objection
	Name withheld, Luddenham 2745	Regional (5-100km from the site)	Comment
	Name withheld, Woy Woy 2256	Broader community interest (>100km from the site)	Objection
	Wayne Willmington, Luddenham 2745	Regional (5-100km from the site)	Support
	Name withheld, Bringelly	Local (<5km from site)	Support

The Department of Planning, Housing and Infrastructure (DPHI) addressed a letter to the BDA dated 15 April 2024 requesting a response to the submissions received during exhibition of the Bradfield City Centre Master Plan.

This RtS Report addresses the issues raised in the submissions received during exhibition and outlines changes to the proposal made since exhibition of the Master Plan along with additional environmental assessment undertaken in relation to biodiversity and flooding.

2 Additional assessment

2.1 Biodiversity assessment

An additional biodiversity assessment was undertaken as part of the Response to Submissions to address issues raised by Department of Climate Change, Environment and Water – Biodiversity Conservation and Science Group (BCS) including in relation to:

- Potential presence of Elderslie Banksia Scrub Forest
- Assessment of *Marsdenia viridiflora* subsp. *Viridiflora* endangered population.

Further field investigations were undertaken by Biosis on behalf of BDA on 18 April 2024 to consider these issues with the findings discussed below. Amendments have been made to the Biodiversity Strategy and Impact Assessment (BSIA) (**Appendix 2**) to reflect these findings.

Elderslie Banksia Scrub Forest

The BCS submission noted that it had recently been advised by the Greater Sydney Local Land Services (GSLLS) of the potential presence of Elderslie Banksia Scrub Forest (EBSF) within the Master Plan area. EBSF is listed as critically endangered under the *Biodiversity Conservation Act 2016* and *Environment Protection and Biodiversity Conservation Act 1999*.

BCS notes the location in question is mapped as low and moderate condition PCT 849 (Cumberland Plain Woodland), with the remaining area containing no native vegetation. BCS recommends that the area be surveyed to verify if the vegetation community is present and that if confirmed, measures should be taken to avoid and mitigate impacts in a revised BSIA.

Based on the findings of the further field investigations, Biosis advised that the vegetation meets the final determination for Cumberland Plain Woodland due to the presence of key diagnostic species across all strata and that the soil type and landscape position are consistent with the description of this Critically Endangered Ecological Community (CEEC) in the final determination (OEH, 2019).

The investigation confirmed that Elderslie Banksia Scrub Forest is not present within the site.

Marsdenia viridiflora subsp. *viridiflora*

The BCS submission noted that the exhibited BSIA is not clear on whether *Marsdenia viridiflora* subsp. *viridiflora* occurs within the Master Plan area and recommended that the presence of this endangered population be clarified in a revised BSIA report.

BCS noted that with regards to mitigating impacts for this species, the BSIA recommends 'individuals should be protected through No-Go zones' if future works in the area are required. BCS considers it should be a requirement that these individuals are protected in the long term. There should also be a requirement for their in-situ protection, and for the use of buffers to minimise potential indirect impacts. BCS recommends expanding the ENZ in this area would assist to achieve this.

Regarding the exhibited BSIA recommendation that options for the relocation of individuals be investigated, BCS advises that translocations are generally not appropriate for mitigating impacts from development as they are generally complex and historically have a high rate of failure.

Further field investigations undertaken by Biosis confirmed that the *Marsdenia viridiflora subsp. viridiflora* population is still present with several individuals physically growing on the boundary fence. Any impacts to the fence in this area (including fence removal) will impact the population. The BSIA has been updated to make this clearer.

A recommendation has been included in Table 17 (Recommendation 9) of the updated BSIA which suggests a No-Go Zone be established around this population. Alternatively, if the fence is to be removed, salvage and relocation of this population should be investigated. However, given the growth habit of these individuals, this may be difficult to undertake. The future impacts associated with works in this area will be subject to separate approval processes.

Appropriate fencing has been installed on site to minimise the risk of access to the affected area and to minimise the risk of harm to the endangered species.

2.2 Flooding assessment

Additional flood investigations were undertaken as part of the RtS Report to address issues raised by DECCEW, Department of Education and NSW SES during the exhibition period. The key issues considered included:

- Additional flood modelling to consider a range of flood events, including the probable maximum flood.
- Consideration of the risk and evacuation issues associated with any development in the flood impacted areas.

Further flood modelling and risk assessment was undertaken by Worley Consulting on behalf of BDA with an Addendum Flood Impact Risk Assessment Report prepared to detail the findings (**Appendix 3**). This built on the original modelling of the 1% Annual Exceedance Probability (AEP) storm, to assess the 1 in 500 year AEP event as well as the Probable Maximum Flood (PMF) for post development conditions). The recommendations from this addendum report are:

- A stormwater drainage network should be designed and implemented to cater for ponding and flows along the proposed roadways. It is noted that this recommendation was previously included in the 2023 FIA. It is envisaged that the inclusion of a stormwater drainage network would:
 - Capture runoff draining along the proposed road network, thereby reducing / preventing Off-site impact A, B and E (refer Figure A-117 and Figure A-118 as well as Section 4.1 and Section 4.2).
 - Reduce the quantity of overland runoff being trained along the road network, thereby reducing flood hazards in the roadway.
 - Reduce or eliminate the ponding of stormwater in low points within the road network.
- Further refinement of the post-development landform to allow greater conveyance of flows along Moore Gully and the tributary that drains the catchment to the north-west of the site. This includes the provision of a swale in a north-south alignment which conveys flows southward towards the Moore Gully opening near the western site boundary. It is noted that this recommendation was also previously included in the 2023 FIA. It is envisaged that a refined post-development landform would reduce or eliminate the localised flow velocity increase within the Moore Gully channel as denoted by Off-site Impact D.

- Floor levels in the development lots to the north of Moore Gully should be set above the PMF level to facilitate a safe Shelter-in-Place (SIP) flood emergency response strategy in that part of the Bradfield precinct. Significant works would not be required to raise future developments to above the PMF level given that PMF depths are typically less than 0.1 metres in this area.
- Entrances to basements and car parks should be set above the PMF level to avoid floodwaters from inundating underground areas.
- It is understood that the design landform for the development lots to the south of Moore Gully has not been prepared. Parts of this area are affected by high flood hazard during the PMF event, although flooding is more benign in events up to and including the 1 in 500 AEP event. In order to minimise risk to life and property in this area, consideration should be given to the following:
 - a) Educating residents on the flood risk at their property, to be alert to weather warnings and instructions from relevant authorities.
 - b) Designating a building outside of the floodplain as an evacuation shelter should residents decide on an early evacuation of the site, as well as informing residents on the available evacuation route(s) to reach flood-free land.
 - c) Avoid designating critical or sensitive land uses in lots within the PMF extent and setting the entrance to proposed basement levels above the peak PMF level.
 - d) Raising habitable floor levels to above the PMF level.
 - e) Using flood compatible building materials and designing buildings to withstand the force of floodwaters.
 - f) Avoid filling within the floodway corridor, which would likely lead to flood impacts further downstream along Thompsons Creek.

These recommendations will be implemented through future development applications associated with the staged delivery of the Master Plan.

2.3 Consideration of recommendations of technical studies

DPHI has requested further detail to explain how recommendations of the technical assessment reports have informed the Master Plan, as a detailed assessment of the likely impacts of the proposed Master Plan is not provided within Section 13 of the Planning Report.

As part of the Response to Submissions, Bradfield Development Authority (BDA) have prepared a table (**Table 2**) detailing how each technical report prepared as requested in the Master Plan Requirements have been used to inform the preparation of the Master Plan or the technical reports recommendations are being implemented through the Master Plan.

Table 2 Summary of technical reports

Technical Report	Purpose	Key Outcomes and Master Plan Response
1. Aboriginal Engagement Outcomes Report	The Aboriginal Engagement Outcomes Report provides an overview of the engagement activities undertaken for the project between November 2022 and May 2023. The report includes:	The vision and the four key values underpinning the Master Plan have been shaped primarily by the engagement and activities undertaken with Traditional Custodians and First Nations consultants, including workshops and walks on Country as part of the Master Plan development. This engagement has guided decisions about the layout, connections, views, open spaces, landscape, water systems, and character.

	<ul style="list-style-type: none"> • An overview of the engagement approach and activities • Key outcomes from engagement • Recommendations for BDA consideration and an overview of key next steps. <p>Development of the key values which informed the design of the Master Plan.</p>	<p>Traditional Custodians and consultants involved were supportive and complementary of the engagement process, Recognise Country Strategy, and the Master Plan outcome.</p> <p>BDA has a commitment to undertake ongoing engagement with Traditional Custodians, Dharug community and other government agencies.</p>
<p>2. Aboriginal Cultural and Heritage Assessment Report (ACHAR)</p>	<p>An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> guidelines to identify any Aboriginal objects or places within the proposed study area.</p>	<p>The ACHAR was prepared to assess the Aboriginal cultural heritage within the Master Plan area. The technical report identified Aboriginal objects or places within the Master Plan area and provides recommendations and mitigation strategies to ensure all considerations are appropriately identified and assessed.</p> <p>As per the recommendations in the report, the following considerations have been implemented within the Master Plan and overall delivery of the Bradfield City Centre:</p> <ul style="list-style-type: none"> • Master Plan responds to, and is consistent, with the Western Sydney Aerotropolis Recognise Country Guidelines, and the Bradfield City Centre Aboriginal Cultural Heritage Assessment Report. • Master Plan layout protects and conserves areas of mapped ENV which covers the areas of high cultural sensitivity, Cumberland Plain Woodland and Thompsons Creek. • BDA has obtained a Site Wide Aboriginal Heritage Impact Permit (AHIP) from Heritage NSW, allowing for the excavation and salvage of Aboriginal artefacts in the Master Plan site.
<p>3. Air Quality Impact Assessment</p>	<p>This air quality impact assessment investigates the potential air quality effects that may arise as a result of the Bradfield City Centre Master Plan.</p>	<p>The Master Plan incorporates a layout which is designed to reduce effects of air emissions from road traffic through positioning major transport corridors relative to sensitive uses, promotion of good air flow throughout the City Centre, and minimising the potential conflict of sensitive and polluting developments.</p> <p>The assessment finds that the Bradfield City Centre Master Plan has spatially located key</p>

		<p>components, such as main transport corridors, in a manner to mitigate the likely sources of air pollutants.</p> <p>The proposed built form provides variability in building structures which allows for cross wind flows around and between buildings to promote good air flow.</p> <p>The Western Sydney Aerotropolis DCP controls will continue to apply to the Master Plan to ensure that the report outcomes are achieved.</p>
<p>4. Arts and Culture Strategy Report</p>	<p>The Arts and Culture Strategy submitted as part of the Master Plan reflects the Authority's ambition to create a distinctive, celebrated, creative and beautiful new city centre.</p>	<p>A summary of the key outcomes of the strategy include:</p> <ul style="list-style-type: none"> • Defines an arts and culture vision statement for Bradfield City Centre • Identifies investment in arts and culture creates jobs, spurs innovation, and helps to create place identity and destination appeal. • Identifies key arts and cultural projects, which are prioritised to respond to the staging of the Bradfield City Centre (focusing on the early stages). <p>The Western Sydney Aerotropolis DCP controls will continue to apply to the Master Plan to ensure that public art is incorporated in the development of buildings with an estimated development value in excess of \$20 million or on developments of greater than 20 hectares.</p> <p>In addition, the Master Plan includes a site-specific development control to ensure that development applications (DAs) have consideration for the Arts and Culture Strategy prepared as part of the Master Plan.</p>
<p>5. Aviation Impact Assessment</p>	<p>This aviation impact assessment investigates the potential impacts of the Bradfield City Centre Master Plan against the requirements of the National Airports Safeguarding Framework Guidelines.</p>	<p>Due to the orientation of its proposed parallel runways and anticipated flightpaths, 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. The Master Plan does not propose any amendments to the Western Parkland City SEPP Obstacle Limitation Surface Map.</p> <p>A key outcome of the aviation impact assessment related to the risk of wildlife in</p>

		the vicinity of the Western Sydney International Airport. The Master Plan does not propose any changes to the Western Sydney Aerotropolis DCP existing wildlife hazard controls.
6. Biodiversity Strategy and Impact Assessment	This biodiversity strategy and impact assessment report outlines the key ecological values likely to occur within the Master Plan area, the impacts associated with the proposed future activities, and provides recommendations.	<p>The report's key outcomes included the identification of ecological impacts; however, it should be noted that all these impacts are limited to areas which have been granted biodiversity certification.</p> <p>The primary measure for any future developments within the study area is to minimise removal of native vegetation and habitat and avoid disruption to existing riparian corridors. Where clearing is unavoidable, development should be designed to retain areas of high-quality vegetation wherever possible.</p> <p>The Master Plan has been developed to avoid all ENZ land and to protect and enhance the environmental values along the Moore Gully and Thompsons Creek riparian zones.</p>
7. Bushfire Strategy and Impact Assessment	This bushfire strategy and impact assessment report considered the broader landscape and risk profile and considered the provision of the bushfire protection measures for the Master Plan.	<p>As specified in the Bushfire Strategy and Impact Assessment Study, indicative Asset Protection Zones (APZs) are achievable within the developable area or within planned managed open space areas.</p> <p>The final location and dimension of APZs are to be confirmed during the detailed design phases of the Bradfield City Centre.</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.</p> <p>The Western Sydney Aerotropolis DCP will continue to apply in relation to bushfire protection measures. The Master Plan does not propose any amendments to the existing controls.</p>
8. Circular Economy (Waste and Services) Report	The Circular Economy (Waste and Services) Report provides an overview of the circular economy approach in the global and local context to provide the strategy for Bradfield City Centre. It identifies circular economy opportunities and sets targets for waste generation	The Circular Economy (Waste and Services) Report provides recommendations on how to design out waste from the outset, use and keep resources in use to their highest value, regenerate natural systems and limit waste to landfill by embedding circular economy principles into infrastructure, land use planning, space allocation, precinct and building design.

	<p>reduction informed by best practice.</p>	<p>The Circular Economy (Waste and Services) Report outlines the following for Bradfield City Centre:</p> <ul style="list-style-type: none"> • Targets for waste generation reduction (operational and construction). • Solutions to avoid waste generation from the outset. • Dedicated food organics management solution. • Minimising movements of waste collection vehicles. • Integration of community education through a circular economy hub. • Circular sharing initiatives. • Opportunities for last mile logistics and industrial symbiosis. <p>The long-term circular economy strategy for Bradfield City Centre will be refined and adapted as Bradfield City Centre is developed over time.</p> <p>The Western Sydney Aerotropolis DCP will continue to apply in relation to waste management and circular economy measures.</p> <p>The Master Plan does not propose any amendments to the existing controls.</p>
<p>9. Consultation Outcomes Report</p>	<p>The Consultation Outcomes Report summarises the engagement undertaken to support the lodgement of the Master Plan Application by outlining:</p> <ul style="list-style-type: none"> • the requirements for consultation • the consultation undertaken, including key meetings with stakeholders • a summary of feedback received by stakeholders, and • how feedback has been considered in the preparation of the Master Plan Application. 	<p>The consultation contributed to the development of a clear vision, values, and objectives detailed in the master plan.</p> <p>BDA will continue to engage with stakeholders and the community during the statutory exhibition of the Master Plan Application, as well as during future stages of the planning and development across Bradfield City Centre.</p> <p>Project teams will continue to work closely with Liverpool City Council, other landowners, authorities, and planning partners across the Western Parkland City</p> <p>An indicative forward plan for stakeholder and community communication and engagement is detailed in the Consultation Outcomes Report (July 2023).</p>
<p>10. Earthworks Report</p>	<p>The Earthworks Report presents the proposed design strategy for the Bradfield City Centre and</p>	<p>The earthworks strategy proposes the following approach:</p>

	<p>demonstrates an option for conformance with performance outcomes.</p>	<ul style="list-style-type: none"> • Creation of a ground profile that supports a walkable and connected urban environment. • Road design and grading in accordance with relevant legislation, guidelines, and manuals. • Interface with Sydney Metro station plaza. • Design responds to key existing constraints including retained vegetation, levels at property boundaries, and proposed creek crossings. • Site graded towards Moore Gully and Thompsons Creek. • Import/Export of material minimised as far as practicable. <p>The Master Plan supports this approach.</p> <p>The Western Sydney Aerotropolis DCP will continue to apply in relation to earthwork requirements. The Master Plan does not propose any amendments to the existing controls.</p>
<p>11. Economic Strategy and Impact Assessment</p>	<p>The Economic Strategy and Impact Assessment considers the role of the Aerotropolis Core precinct as part of this broader economic context while providing detailed technical analysis on the Bradfield City Centre Master Plan.</p>	<p>The Master Plan has adopted the report outcomes and considers the Bradfield City Centre at a more granular level to create a variety of character areas and experiences to attract diverse range of people and businesses.</p> <p>The Master Plan provides for a mix of both retail and residential that will encourage a vibrant and active community to live and work, particularly retail as it will support employment and accommodate population growth.</p>
<p>12. Flooding Impact Assessment</p>	<p>The purpose of this report is to define existing flood characteristics along the sections of Moore Gully and Thompsons Creek that run through or adjoin the Bradfield Precinct and to assess the impact of the proposed Bradfield City Centre development on those flood characteristics.</p>	<p>The Flood Impact Assessment considers the proposed earthworks strategy and master plan layout to assess the post development flooding impacts.</p> <p>Through an iterative process, the Master Plan and earthworks strategies were refined to ensure that minimal impacts offsite (and contained within identified flood impacted areas) occurred.</p> <p>The Western Sydney Aerotropolis DCP will continue to apply in relation to flood mitigation requirements. The Master Plan does not propose any amendments to the existing controls.</p>

		A Flood Impact and Risk Assessment has been prepared as an addendum post exhibition, in response to submissions.
13. Ground Conditions and Contamination Assessment	A number of ground condition and contamination assessments have been prepared in accordance with the relevant legislation to identify any ground condition or contamination constraints to development at the Bradfield City Centre site.	<p>These assessments concluded the Bradfield City Centre site is free from contamination.</p> <p>An Asbestos Management Plan to be implemented for any unexpected finds has also been prepared.</p> <p>Findings have been considered in the preparation of the Master Plan.</p>
14. Housing Strategy Statement Report	The Housing Strategy Statement Report identifies the housing targets for the Bradfield City Centre.	<p>The Master Plan has adopted the outcomes of the Housing Strategy Statement Report and identifies the capacity to accommodate 10,000 residential dwellings.</p> <p>The finalised Master Plan includes an additional development control in relation to affordable housing.</p> <p>It includes a requirement for affordable housing to be provided in future developments, in line with current NSW Government policy.</p>
15. Infrastructure Delivery Strategy	The Infrastructure Delivery Strategy outlines the contributions frameworks that apply to the site.	<p>The Infrastructure Delivery Strategy:</p> <ul style="list-style-type: none"> • Identifies the contribution items within the Bradfield City Centre. • Provides a preliminary list of proposed works in kind items. • Identifies any differences between proposed quantities and requirements. • Identifies infrastructure priorities and staging. <p>The Master Plan does not propose to change the existing contributions framework that apply to the site.</p>
16. Integrated Water Cycle Management Report	The Integrated Water Cycle Management Report presents the proposed drainage strategy for Bradfield City Centre.	<p>An Integrated Water Cycle Management Report considers the proposed drainage strategy and demonstrates how compliance with the Western Sydney Aerotropolis DCP stormwater quality and quantity requirements can be achieved.</p> <p>The Master Plan has considered the outcomes of this report and implemented perviousness targets for the land use types in order to achieve the overall perviousness requirements across the entire Bradfield City Centre site.</p>

		<p>The Master Plan is proposing site specific controls in relation to perviousness and Strahler Order 1 water courses. The remainder of the Western Sydney Aerotropolis DCP requirements will continue to apply.</p>
<p>17. Noise and Vibration Impact Assessment</p>	<p>The Noise and Vibration Impact Assessment provides a high-level assessment of the potential noise and vibration impacts for the Master Plan.</p>	<p>A summary of the findings are:</p> <ul style="list-style-type: none"> • Noise associated with the airport poses no impacts to master planning. • Buildings still need to be designed to meet applicable Australian Standards and Guidelines in relation to noise abatement. • Transport infrastructure (roads, vehicles) may cause noise and vibration impacts to buildings depending on their location near transport corridors. • Future development will be designed to facilitate the masking of unwanted urban noise, ensuring like for like land use cases are grouped together, and that the design of buildings be attuned to reduce or minimise noise and vibration impacts between buildings, infrastructure, and human activity. <p>The Western Sydney Aerotropolis DCP will continue to apply in relation to noise and vibration requirements. The Master Plan does not propose any amendments to the existing controls.</p>
<p>18. Smart Cities Implementation Plan</p>	<p>The Smart Cities Implementation Plan was prepared to articulate the smart cities vision for Bradfield City Centre.</p>	<p>The Smart Cities Implementation Plan:</p> <ul style="list-style-type: none"> • Provides an approach that facilitates compliance with DCP Performance Outcomes over the Master Plan’s lifetime. • Outlines that: <ul style="list-style-type: none"> ○ backbone infrastructure to services both precinct wide and local solutions. ○ telecommunications facilities are to be provided to enable a multitude of providers to have access to infrastructure. ○ road reserves have been designed to house all the expected servicing infrastructure. ○ opportunities for shared existing trenching will be considered to improve spatial efficiency.

		<p>The Western Sydney Aerotropolis DCP will continue to apply in relation to smart cities requirements.</p> <p>The Master Plan does not propose any amendments to the existing controls.</p>
<p>19. Social Infrastructure Strategy</p>	<p>This Social Infrastructure Strategy report has been prepared to understand the future community and the needs of different users including residents, workers and visitors, within the Bradfield City Centre Master Plan site in order to inform social infrastructure provision recommendations and considerations to enhance social sustainability.</p>	<p>Needs have been informed by the outcomes of consultations with the relevant NSW Government agencies, councils, and various service providers that informed the <i>Draft Western Sydney Aerotropolis Social Infrastructure Strategy - Report 2: Social Infrastructure Needs Assessment</i>.</p> <p>Meetings were also held with NSW Government agencies and Liverpool City Council to confirm the relevant criteria for the planning and provision of social infrastructure to confirm buy-in to the recommendations made.</p> <p>The strategy proposes facilities that will enable Bradfield to become a self-sufficient city with all relevant services available to its residents and workers.</p> <p>Most Precinct Plan recommendations have been adopted and provision of aged and disability care facilities exceeded.</p> <p>The Master Plan includes an indicative plan illustrating the potential locations for social infrastructure, subject to detailed design and funding arrangements.</p> <p>It proposes a site-specific control to require future DAs to have consideration of the Social Infrastructure Strategy.</p>
<p>20. Statement of Heritage Impact Report</p>	<p>This Statement of Heritage Impact report addresses the impacts of the Bradfield City Centre on non-Aboriginal heritage on or surrounding the site.</p>	<p>The Statement of Heritage Impact (SOHI) Report determined that the study area does not include any identified heritage items on any statutory or non-statutory registers.</p> <p>The SOHI identified that the adjoining site includes the Kelvin Grove State Heritage Item and includes recommendations to minimise impact. These recommendations are consistent with existing heritage controls in the Western Sydney Aerotropolis DCP.</p> <p>The Master Plan has adopted these recommendations and aligned the road and pedestrian movement networks in a manner to retain significant view lines to this item.</p>

		The Master Plan does not propose any site-specific heritage controls.
21. Sustainability Report	The Sustainability Report presents a master plan-level Sustainability Framework for Bradfield City Centre (the City Centre). The report establishes the Framework to ensure sustainability outcomes are implemented in accordance with the Bradfield City Centre Master Plan (the Master Plan), through future design and delivery streams for the construction of infrastructure, the public domain, and buildings.	<p>Six key sustainability commitments have been established for Bradfield City Centre to both meet the needs of the development and its users well into the future and align with NSW government policy and planning objectives.</p> <ol style="list-style-type: none"> 1. Achieve net-zero carbon emissions by 2030. 2. Provide an unrestricted supply of water that is resilient to drought and enable unrestricted use to activate blue/green connections and reduce reliance on potable supplies. 3. Minimise waste to landfill and promote circular economy initiatives that creates a symbiotic relationship between the residential and advanced manufacturing industries within Bradfield. 4. Create a healthy environment for people and the natural ecology. 5. Be resilient to climate impacts and mitigate the urban heat island effect. 6. Generate sustainable social outcomes through placemaking and community building. <p>The Western Sydney Aerotropolis DCP will continue to apply in relation to sustainability requirements.</p> <p>The Master Plan does not propose any amendments to the existing controls.</p>
22. Traffic Management Accessibility Plan Report	The Traffic Management Accessibility Plan (TMAP) report for Bradfield City Centre is a technical document covering transport, traffic, parking, and connectivity.	<p>The Master Plan has been prepared with consideration of the various recommendations include in the TMAP.</p> <p>The street layout and road cross sections contained in the Master Plan were subject to extensive consultation and consideration by Transport for NSW, Liverpool City Council and BDA during the Master Plan preparation.</p> <p>The Master Plan proposes site specific controls to require future DAs to prepare a green travel plan and have consideration of the Access and Servicing Plan (currently being prepared by Transport for NSW) and the Travel Demand Management Strategy (currently being prepared by BDA).</p>
23. Utility Infrastructure and Servicing Strategy	The Utility Infrastructure and Servicing Strategy is a	The Master Plan has considered the outcomes of this report, which identifies

	<p>technical document outlining the estimated requirements for the utility services for the Bradfield City Centre Master Plan.</p>	<p>expected demand and potential utility amplifications required to service the site.</p> <p>A summary of the findings are:</p> <ul style="list-style-type: none"> • Potable Water, Recycled Water, and Wastewater services are to be provided in accordance with Sydney Water’s standards and guidelines. • Electrical supply arrangements are to be implemented via Endeavour Energy. • Telecommunications facilities are to be provided to enable a multitude of telecommunication providers to have access to communications infrastructure. <p>The Master Plan has implemented the outcomes of this report through ensuring that road reserves have been designed to accommodate all the expected servicing infrastructure.</p> <p>Opportunities for shared existing trenching will be considered to improve spatial efficiency.</p> <p>The Western Sydney Aerotropolis DCP will continue to apply in relation to utility servicing requirements.</p> <p>The Master Plan does not propose any amendments to the existing controls.</p>
<p>24. Pedestrian Wind Environment Assessment</p>	<p>The Pedestrian Wind Impact Assessment report presents an assessment of the likely wind conditions for consideration in the Master Plan.</p>	<p>The Pedestrian Wind Environment Review provides an assessment of the indicative built form for Bradfield City Centre against the principal wind directions.</p> <p>The report confirms that the wind effects can be mitigated, and local wind conditions further enhanced in these areas with the consideration of the mitigation measures and recommendations within the Pedestrian Wind Environment Review.</p> <p>The final Master Plan proposes site specific controls to require future DAs to prepare a wind study report for specific development types and wind tunnel testing for buildings greater than 40 metres in height.</p>
<p>25. 24 Hour Economy Strategy</p>	<p>BDA has a vision for the establishment of a 24-Hour economy in Bradfield City Centre, as it matures into a city at scale.</p>	<p>A summary of the findings are:</p> <ul style="list-style-type: none"> • Optimising growth in the metro corridor servicing Bradfield City Centre could expand the catchment for a nighttime economy.

- Car parking capacity to cater for potential customers from outside the Bradfield City Centre where access via the metro/bus will likely not be a reasonable or preferred option requires consideration.

The Western Sydney Aerotropolis DCP will continue to apply in relation to nighttime economy uses.

The Master Plan does not propose any amendments to the existing controls.

3 Post exhibition changes

The proposed changes made to the Master Plan since public exhibition in response to submissions received are outlined below.

Additional detailed information of the changes to the design are located in **Appendices 1 to 6** of this Report.

3.1 Precinct Plan Amendments

The exhibited Master Plan documents included proposed changes to the Street Hierarchy Plan in the Western Sydney Aerotropolis Precinct Plan (March 2022). These were proposed to refine the road network to rationalise the grid pattern and enhance sight lines to the State heritage-listed Kelvin Park.

This resulted in changes to the road network adjacent to and within adjoining land at the northeast corner of the site. It included removal of a proposed local road outside the site along the northern boundary and a collector road within the Master Plan site along the eastern boundary.

Figure 1 Exhibited Precinct Plan Amendments (by the Master Plan)



Concerns were raised in submissions made by adjoining landowners at 40 The Retreat to the east of the site and 225-245 Badgerys Creek Road to the north of the site to these proposed changes as detailed below.

40 The Retreat (to the east of the site)

- *The proposed amendment to the Street Alignment Plan in the draft revisions to the Western Sydney Aerotropolis Precinct Plan results in a diminish ability for the orderly development of 40 The Retreat.*
- *The proposed realignment of a collector road in the current Western Sydney Aerotropolis Precinct Plan removes access which has long been intended to be delivered along the eastern boundary of Bradfield.*
- *Sufficient justification of this design amendment has not been provided given the significant impact this realignment has on accessibility.*
- *The proposed road alignment adjacent to 40 The Retreat does not consider the existing property boundaries and will result in an illogical road layout creating lot severance issues whereby three individual roads converge on each other at the western boundary of the masterplan area where it adjoins 40 The Retreat, Bradfield.*
- *The proposed street intersections that will result from the road alignment adjacent to 40 The Retreat will result in multiple lots of a shape and size that cannot be developed in isolation and would require land amalgamations with adjoining landowners.*
- *In contrast, the road pattern in the current Western Sydney Aerotropolis Precinct Plan aligns with existing Lot boundaries adjacent to 40 The Retreat, avoiding the need to undertake land amalgamations in order to be able to develop.*

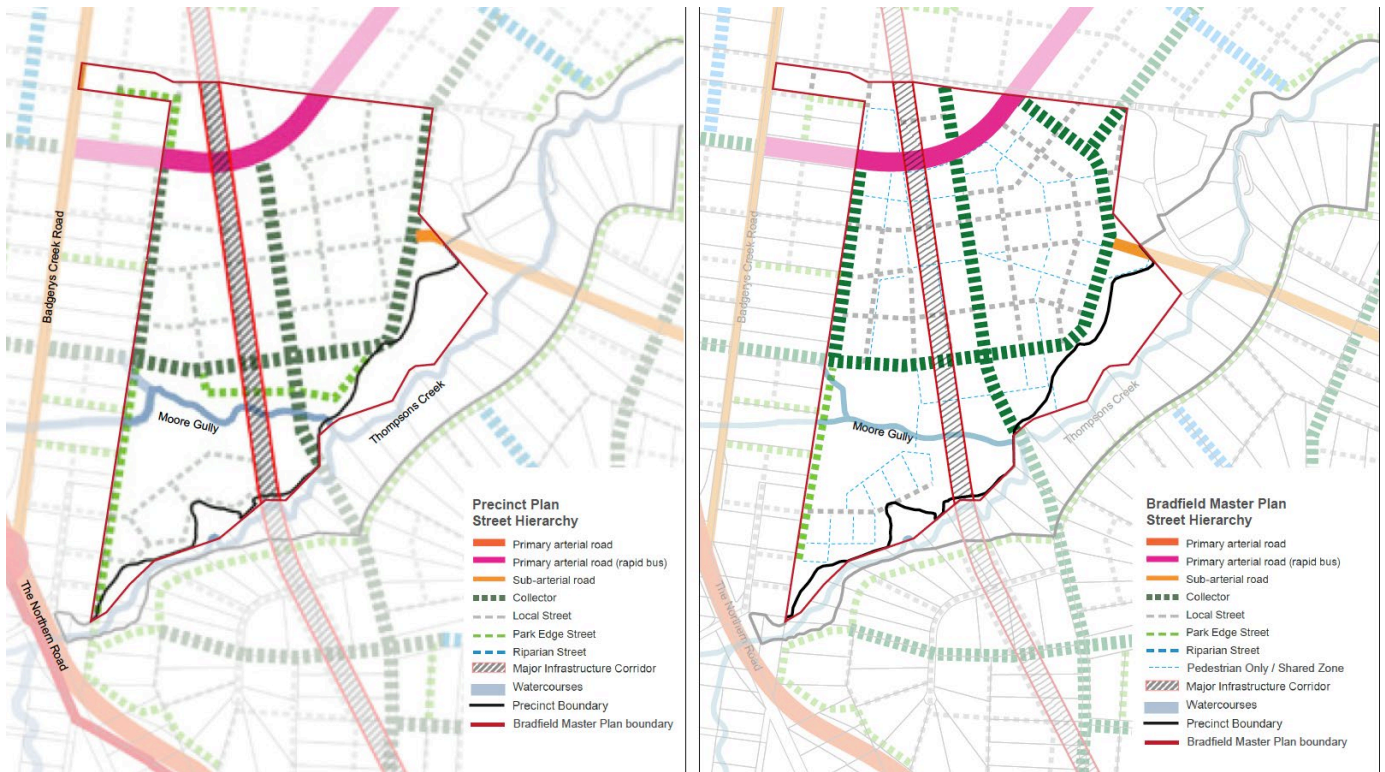
225-245 Badgerys Creek Road (to the north of the site)

- *Without the separating road (which is owned by a third party), this diminishes the ability to appropriately manage the development of irregular shaped blocks.*
- *Rather, it creates a situation where the development outcome across the three sites is reliant on a shared development outcome and creates issues with the timing of the delivery of development across the three sites, as well as the potential for the built form outcomes to conflict and create an undesirable urban outcome.*
- *Further design consideration is required to ensure the interface between the City Centre and the surrounding landholdings is appropriately thought out and addressed. Three sites to the north are reliant on a shared development outcome.*

To respond to the issues, the draft Master Plan has been amended to re-instate the local street along the north eastern boundary of Bradfield City Centre, consistent with the Western Sydney Aerotropolis Precinct Plan (March 2022). It has also been amended to remove any changes to the local streets outside the Bradfield City Centre boundary. Local streets are illustrated in grey as per the Street Hierarchy Plan legend.

Figure 2 below illustrates the amendments to the interface between the Western Sydney Aerotropolis Precinct Plan and the revised Master Plan:

Figure 2 Post Exhibition Precinct Plan Amendments (by the Master Plan)



A minor change has been made to the exhibited Total Water Cycle Management and Blue – Green Infrastructure Framework plans in response to issues raised by DECCEW. The location of stormwater infrastructure in the south is being shown as removed on the exhibited plans which is inconsistent with the stormwater location in the Integrated Water Cycle Management Plan.

Both plans have been amended and reinstate the stormwater infrastructure to its original location as shown in the Precinct Plan.

Figures 3 – 6 below show the exhibited and amended plans.

Figure 3 Exhibited Total Water Cycle Management Plan

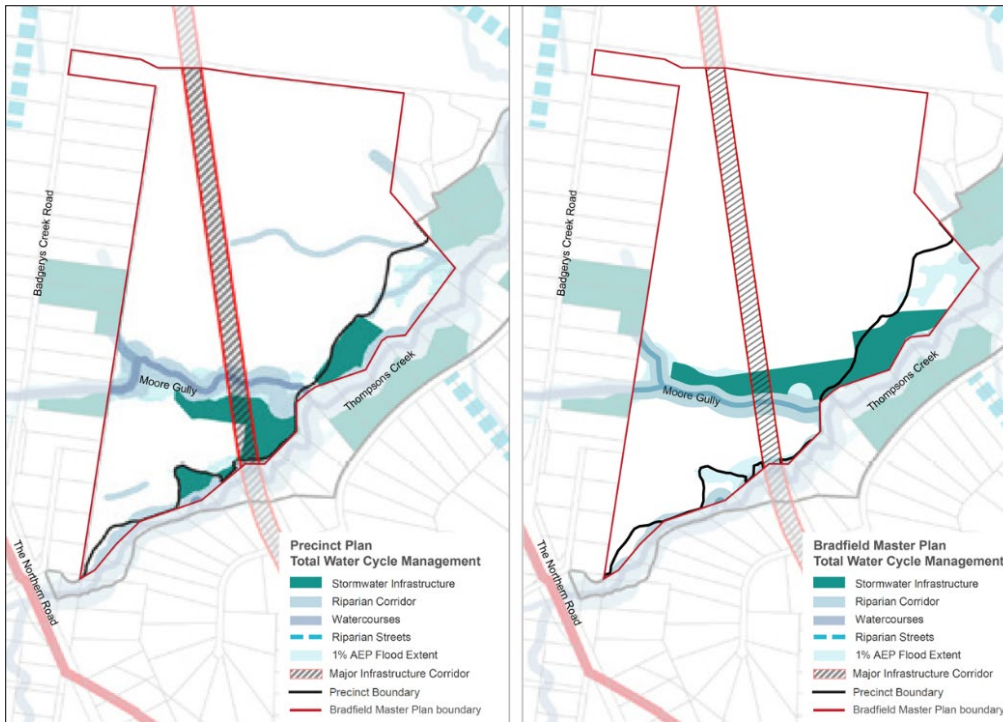


Figure 4 Post Exhibition Amendments - Total Water Cycle Management Plan

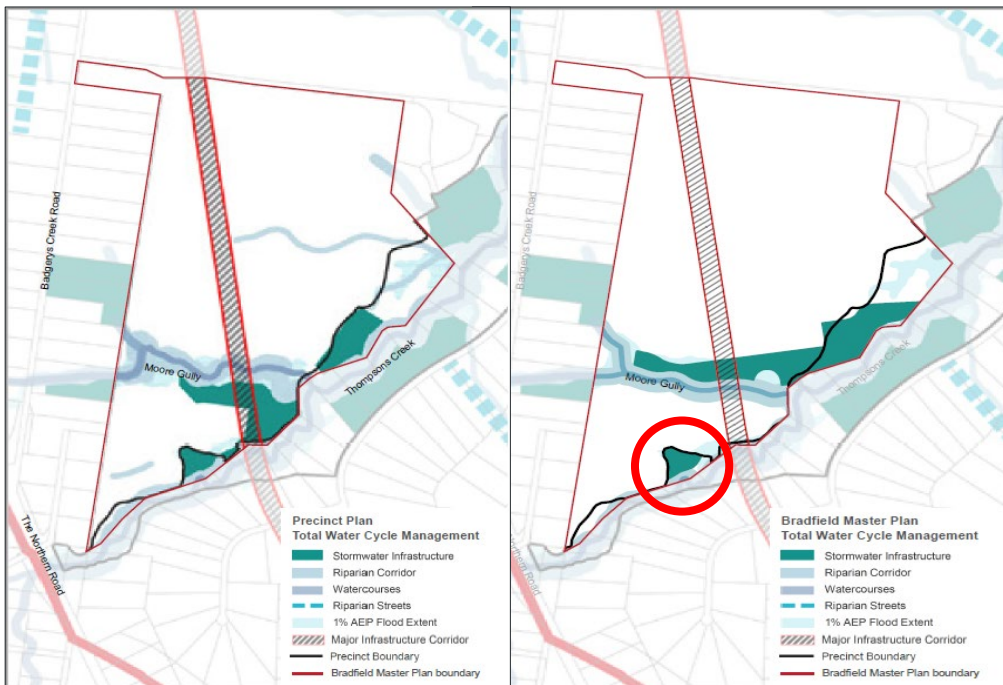


Figure 5 Exhibited Blue - Green Infrastructure Framework

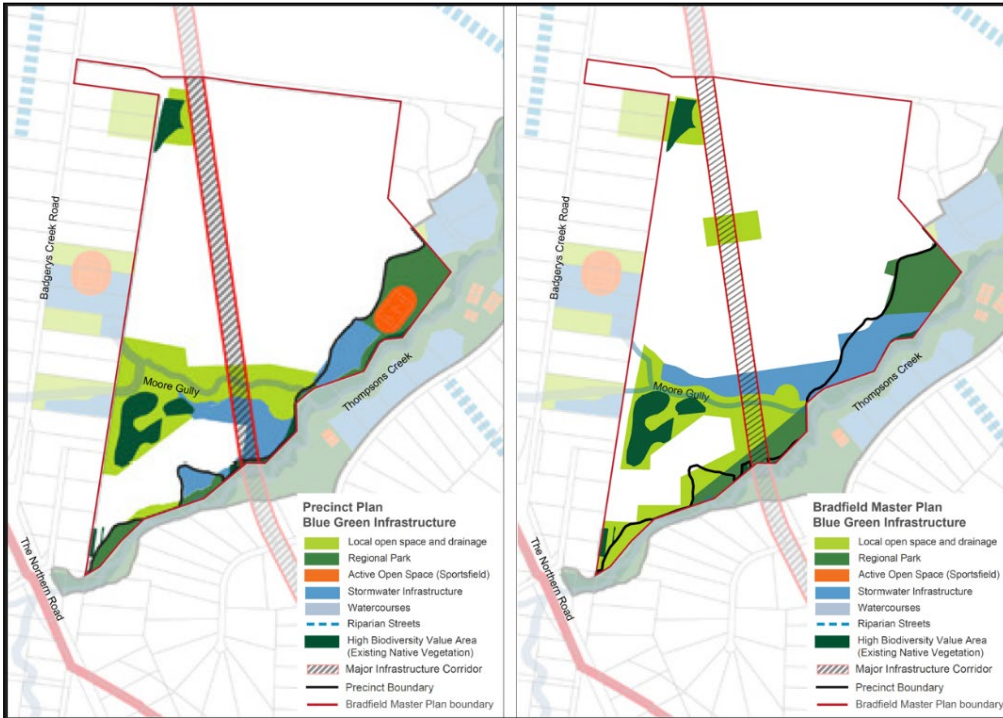
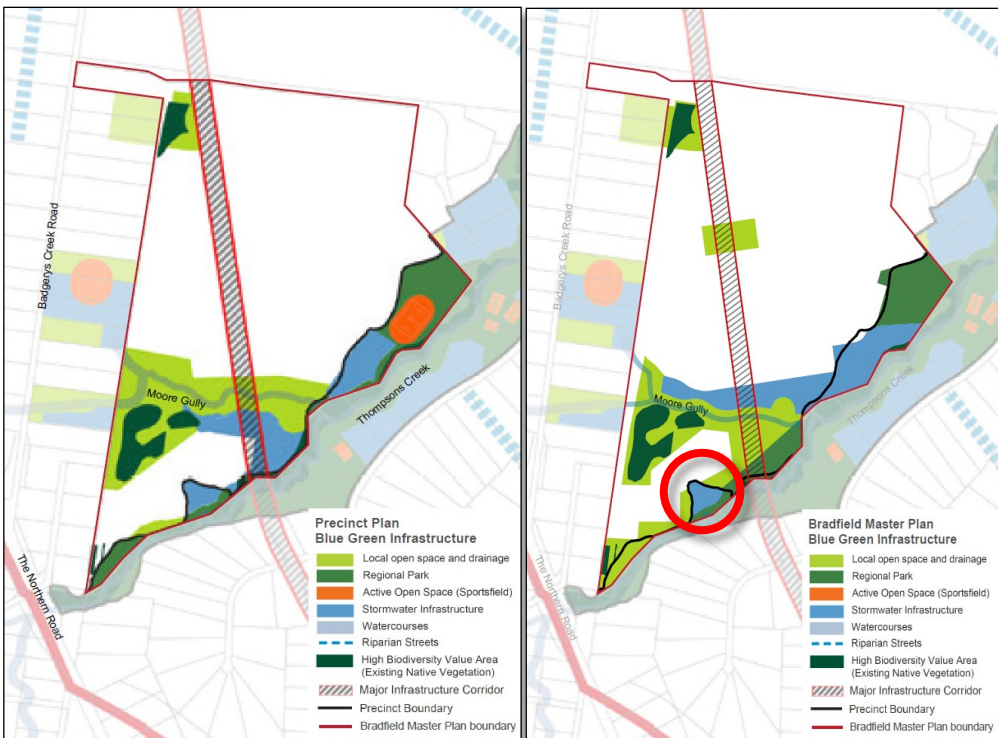
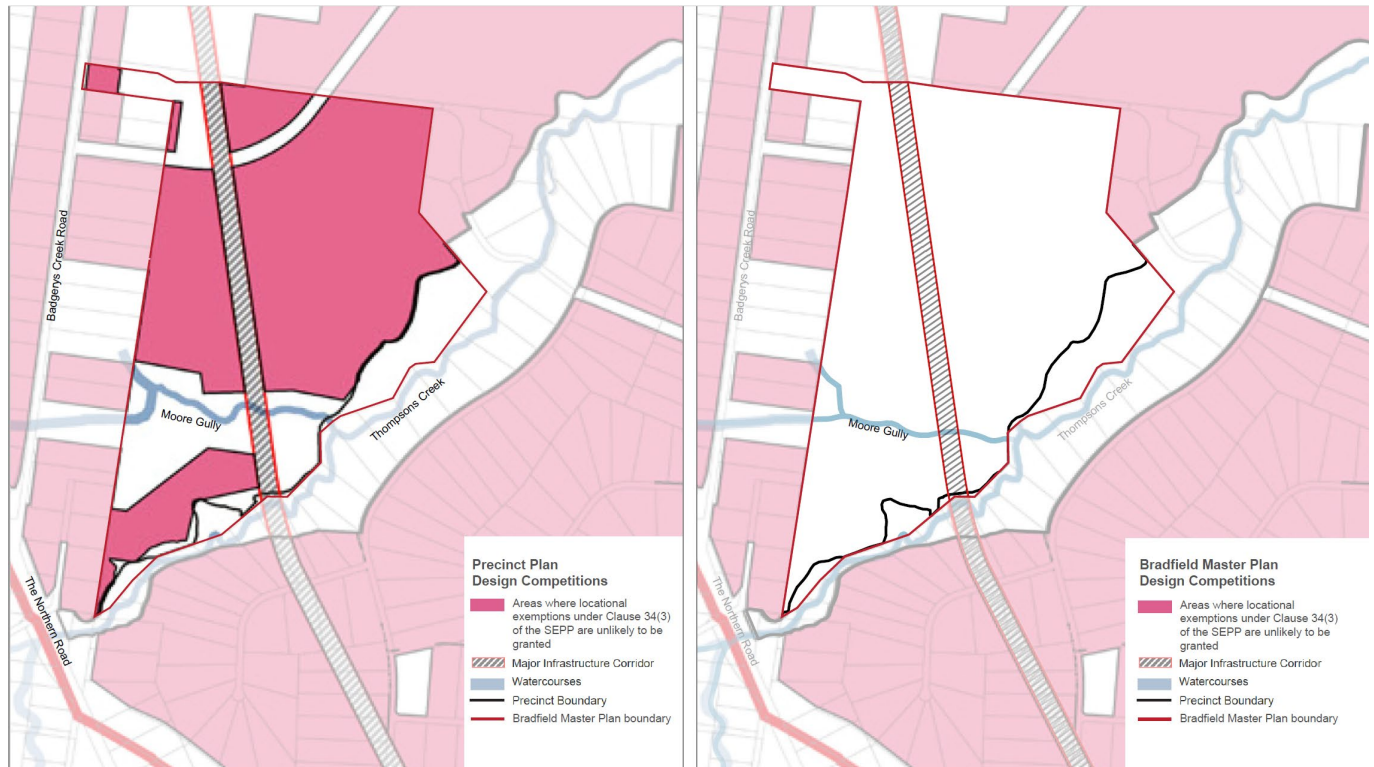


Figure 6 Post Exhibition Amendments Blue - Green Infrastructure Framework



A minor change is proposed to Figure 14 Design Competitions in Section 5.6 Design Excellence, the proposed change is shown in **Figure 7** below. The change relates to removing the Bradfield City Centre site from the “Areas where locational exemptions under Clause 34(3) of the SEPP are unlikely to be granted” shading in the figure. This change is required because the Master Plan includes a site-specific design excellence strategy, which details the requirements for design competitions (including identifying specific locations within the site). As a result, highlighting the Bradfield City Centre in Figure 14 upon the approval of the Master Plan is not necessary.

Figure 7 Proposed Changes to Design Competitions Map



3.2 Master Plan Amendments

3.2.1 General changes

A number of changes have been made to the structure and layout of the Master Plan document (**Appendix 1**) in response to issues raised by DPHI. This includes changes to the Master Plan to more clearly define the overarching vision, objectives, development controls and alternative benchmark solutions.

3.2.2 Changes to the Master Plan layout

Minor changes have been made to the Master Plan layout to align with the amended Precinct Plan as discussed in **Section 3.1**. The Master Plan as exhibited is shown in **Figure 8** below, the amended Master Plan with changes to the roads layout as it interfaces with neighbouring sites is shown in **Figure 9** below. All figures in the Master Plan document have been updated to be consistent with this new layout.

Figure 8 Exhibited Master Plan Layout

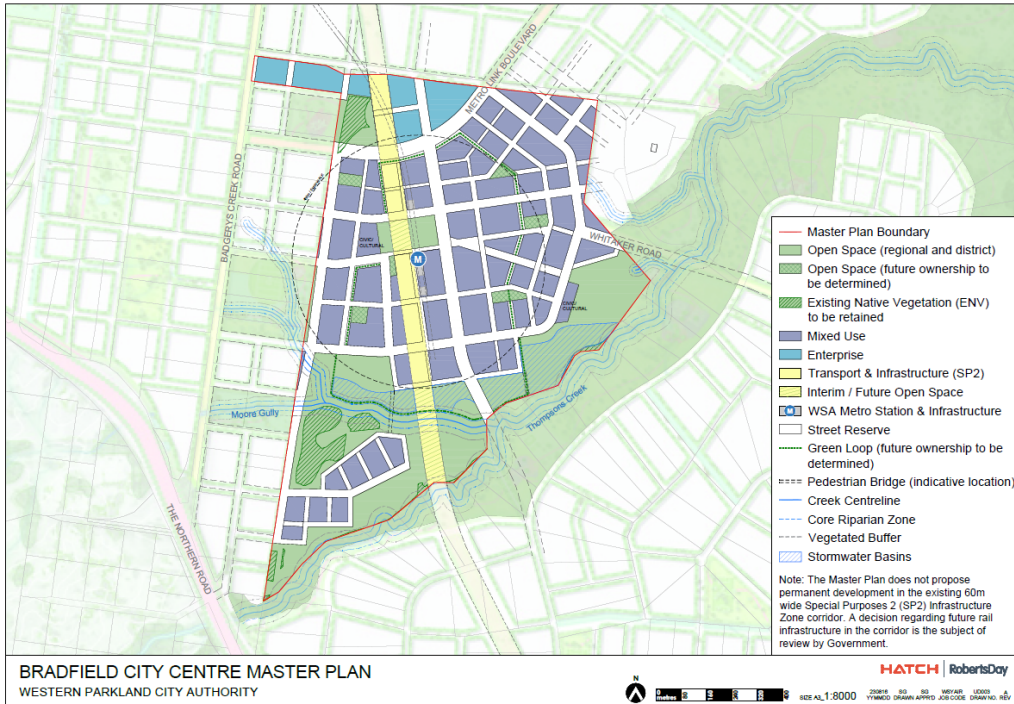
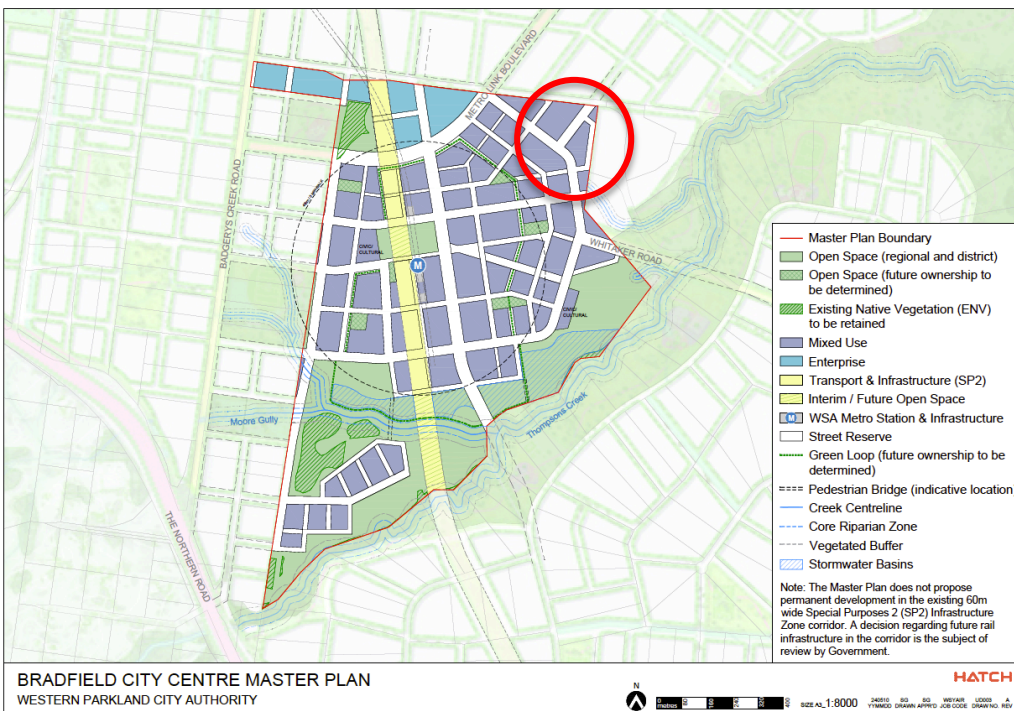


Figure 9 Revised Master Plan Layout



3.2.3 Affordable housing

A number of Government and community submissions highlighted the need to nominate an affordable housing target within the Master Plan.

To respond to this, an additional control has been included in the Master Plan, which includes a requirement for affordable housing to be provided in future developments, in line with current NSW Government policy.

The Bradfield City Centre is being developed on publicly owned land. To promote and ensure the adequate provision of affordable housing in the Bradfield City Centre, the first land release of 4.8 hectares put to the market for Expression of Interest in April 2024 requires a minimum 1,000 homes with 30% affordable housing.

3.2.4 Wind impact criteria

The Master Plan has been amended to include specific criteria for wind impacts rather than heads of consideration. The criteria identified are generally consistent with criteria included for Parramatta City Centre in the Parramatta Development Control Plan 2023 and for specific sites in the Sydney Development Control Plan 2012.

The criteria are detailed below and will ensure that wind impacts of future development are appropriately management across Bradfield City Centre.

- To ensure comfort in and around new buildings, the wind speeds below must be exceeded for less than 5% of the time around new buildings for both hourly mean and gust equivalent mean wind speeds:
 - < 4 m/s: Sitting (such as cafe style dining), or scheduled outdoor events
 - < 6 m/s: Standing, generally supports outdoor planting
 - < 8 m/s: Walking in retail areas / active street frontages
 - < 10 m/s: Walking / non-active street frontages (objective walking from A to B or for cycling)
- To ensure comfort in public open space, the wind speeds below must be exceeded for less than 5% of the time around new buildings for both hourly mean and gust equivalent mean wind speeds:
 - < 4 m/s: for all other open space
 - < 8 m/s: for active open space.
- To ensure public safety, a 3 second moving average gust wind speed of 23 metres/second must be exceeded for less than 0.1% of time.
- A wind study report must be submitted with the DA for all buildings greater than 20 metres in height.
- For buildings greater than 40 metres in height, or sites with more than one building greater than 20 metres in height, the quantitative results from a wind tunnel test are to be included in the wind study report.

3.2.5 Public domain strategy

A number of submissions raised concerns about the lack of detail in the Master Plan on the treatment of the public domain and the need for consistent requirements across Bradfield.

BDA is preparing a Bradfield City Centre Public Domain Strategy which will detail such matters as pavement treatments, landscaping, and street furniture. The Master Plan has been amended to include a requirement for future DAs to demonstrate consistency with this strategy.

3.2.6 Road network design and travel demand

A number of submissions raised concerns about the lack of detail in the Master Plan about the road network including the need for intersection design, traffic calming measures and pedestrian / cycle crossings. The need for Green Travel Plans to be prepared for future development was also raised.

Transport for NSW is preparing an Access and Servicing Strategy in consultation with Liverpool City Council and BDA which will provide further detail on the road network to address the above concerns. Further, BDA has already commenced preparation of a Travel Demand Strategy in consultation with Liverpool City Council and Transport for NSW.

The Master Plan has been amended to include the following controls which will apply to future development:

- Future DA's are to consider the Bradfield City Centre Access and Servicing Plan and
- Future DA's are to consider the Bradfield City Centre Travel Demand Strategy.
- Future DA's are required to prepare a Green Travel Plan.

3.2.7 Exempt and Complying Development

To responds to issues raised in submissions, and by DPHI, changes have been made to the strategy for applying additional exempt and complying development provisions for Bradfield City Centre. This includes the following changes:

- All additional exempt development provisions have been removed from the Master Plan.
- The Complying Development provisions relating to change of use of already approved commercial and industrial buildings which form an appendix to the Master Plan have been amended to include all relevant provisions from the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* (Codes SEPP).

3.2.8 Design Excellence

Through the master planning process BDA conducted an analysis of the likely effect of the existing Design Excellence provisions contained in Clause 4.32 of the SEPP. The current provisions contained in the SEPP require Design Excellence competitions for buildings greater than 40 m or 12 storeys in height, which would generate approximately over 100 Architectural Design Competitions across the entire site.

As part of the Master Plan a Design Excellence Strategy was prepared and sets out an alternative approach that is consistent with Parramatta CBD and the Sydney CBD. The alternative strategy would reduce the number of competitions to be more manageable, whilst identifying important landmark and gateway sites which would be subject to a competition.

WCPA has worked with Government Architect NSW (GANSW) to refine the Design Excellence Strategy and related aspects of the Master Plan. The amended Design Excellence Strategy has been included as a chapter in the Master Plan document.

Key changes include to the Design Excellence Strategy include:

- Simplification of the design excellence strategy to set out the criteria and process for assessing design excellence.
- Inclusion of relevant provisions of Part 4.5 of the Western Parkland City SEPP relating to consideration of design excellence into the Master Plan, given the Part 4.5 will no longer apply.
- Inclusion of a requirement that landscape design is to be undertaken concurrently with building design and a preliminary landscaping strategy is to be submitted as part of each competitive process.
- Removal of provisions in the Master Plan allowing for additional building height to be considered subject to the airport limitation.
- Amendments to the Design Competition Location Plan as shown in **Figure 10** below based on comments received from the GANSW.
- The revised Design Competition Location Plan has removed mapped open space requiring a design competition. This is on the basis that the majority of Ridge Park is identified as ENV, and the majority of Thompsons Creek is identified for future stormwater infrastructure and therefore a design competition process is not appropriate. Central Park has already undergone a design competition.
- Further, the revised plan shows sites where buildings could exceed 55m and includes an exclusion clause that states a design competition is not required for Landmark buildings and Gateway buildings if a building has a height of less than 3 storeys above ground level. The exclusion clause is consistent with the objectives of Clause 5.5 of the Precinct Plan which encourages the flexibility for development and land uses to evolve as the site matures overtime. Specifically for Bradfield City Centre it will enable development in the form of temporary uses on constrained sites in the short term without the need for a Design Competition.
- Inclusion of a State Design Review Panel map as shown in **Figure 11** below as requested by the GANSW. The State Design Review Panel Map indicates that open space identified as 'Moore Gully/Thompsons Creek Regional Park' be subject to a design review by the State Design Review Panel.

Figure 10 Revised Design Competition Location Plan

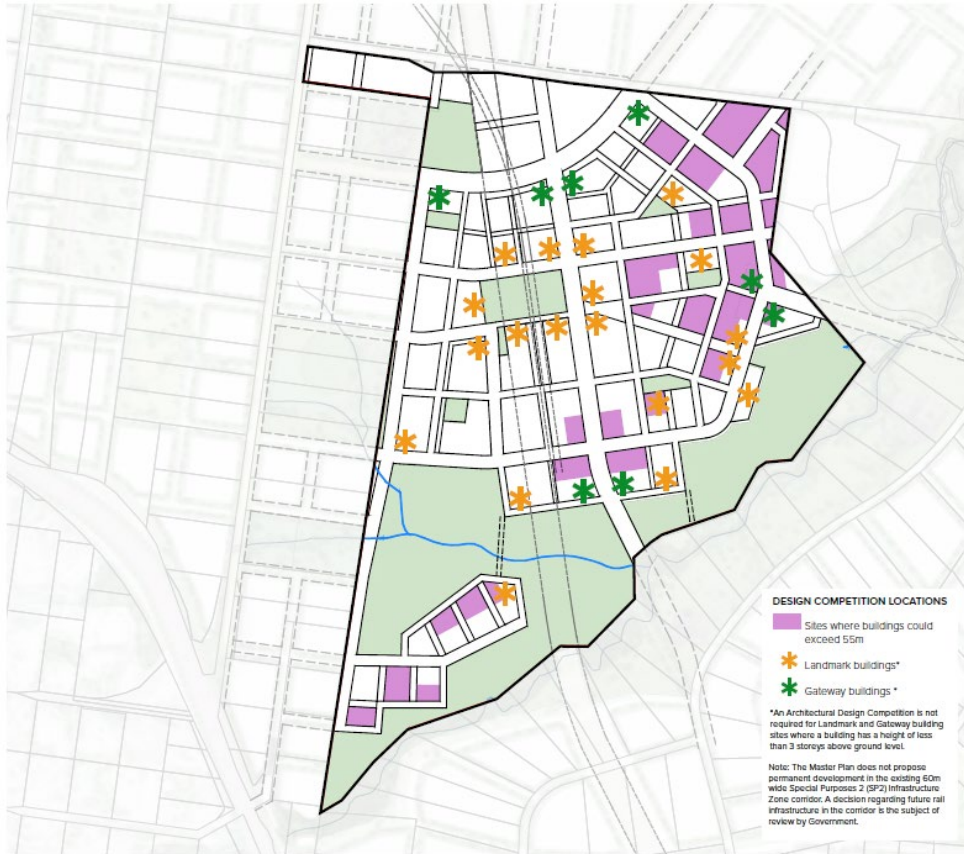
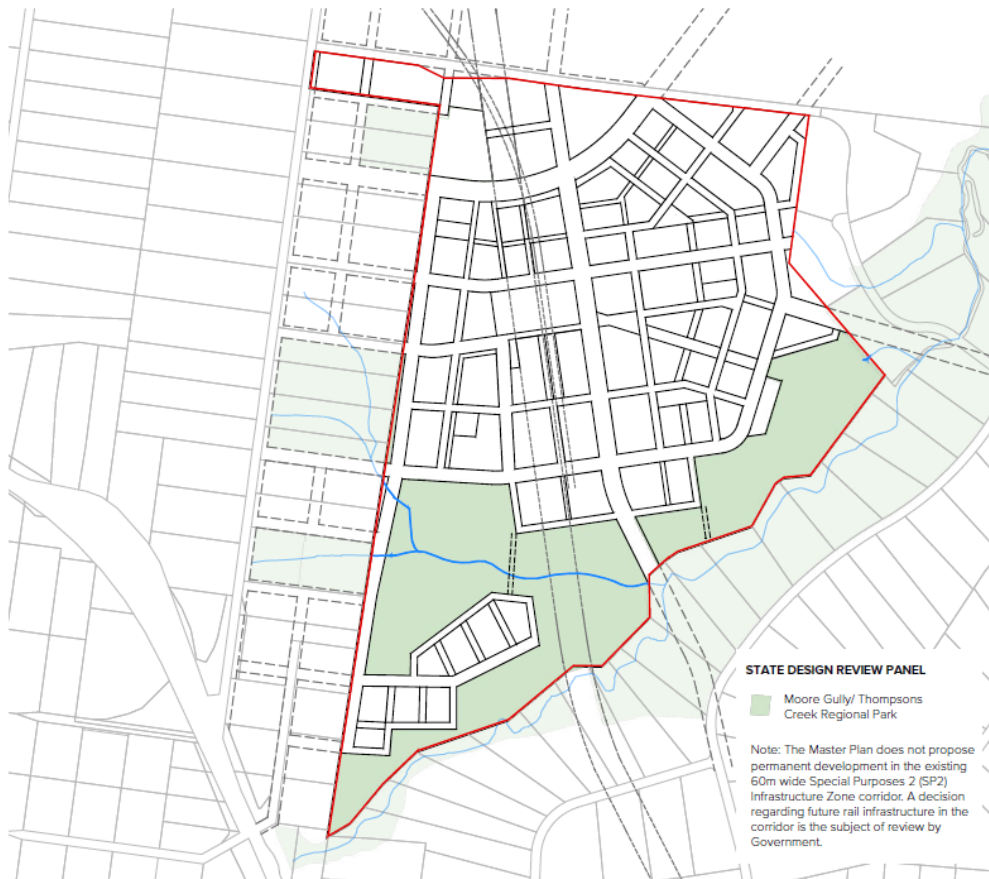


Figure 11 State Design Review Panel Location Map



The key changes to the Design Excellence Strategy have been undertaken in consultation with the GANSW.

The GANSW has provided its endorsement of the strategy.

3.2.9 Public art

The submission from Liverpool City Council raised concerns about the Arts and Culture Strategy including:

- The need to be consistent with and built on the provisions of the Aerotropolis Precinct Plan.
- The need for clarity on how identified deliverables will be made and who will be responsible for implementation and completion, with an emphasis on requirements under the Aerotropolis DCP.
- Request for a series of amendments to the wording and terminology within the Art Strategy including in relation to First Nations.
- Recommendation for clear commitment to ensuring public art and culture are embedded into the fabric of the City.

The submission from the Urban Taskforce also recommended that prescriptive elements be removed from Public Art Strategy such as involving artists in planning.

The Western Sydney Aerotropolis Precinct Plan does not include provisions relating to public art, however the Western Sydney Aerotropolis DCP requires public art to be provided for all developments on sites over 20 hectares or with an estimated development cost exceeding \$20 million. No changes are proposed to the public art provisions under the Western Sydney Aerotropolis DCP, and the Master Plan has been amended to clarify this.

The Arts and Culture Strategy builds on the provisions of the Western Sydney Aerotropolis DCP by identifying cultural facilities and locations for public art within the public domain and Government led developments. The implementation of the Arts and Culture Strategy is subject to decisions on funding allocation. The Master Plan has been updated to require that future DAs have consideration for the Bradfield City Centre Arts and Culture Strategy.

Amendments have been made to the Arts and Cultural Strategy (**Appendix 4**) to reflect address Councils comments.

3.2.10 Flooding

Additional flood investigations were undertaken as part of the RtS Report to address issues raised by DECCEW, Department of Education and NSW SES during the exhibition period. As a result of these additional flood investigations the Master Plan has been updated to include an additional control that prohibits ground floor residential in areas impacted by the PMF.

4 Response to Submissions

This section provides a summary of the BDA's response to the issues raised in submissions.

4.1 Response to Government Agencies and Councils

The following section provides response to 18 submissions received from Government Agencies during or closely after closure of exhibition. There were no opposition to the Master Plan in the responses with only comments provided.

4.1.1 Council – Liverpool City Council

Table 3 below outlines the comments and issues raised by Liverpool City Council and the associated responses by the BDA.

Table 3 Liverpool Council Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Connections to Neighbouring sites	It is requested that the Master Plan provides further analysis of the adjoining sites to ensure a consistent provision of necessary infrastructure. Identification of new key access links to the east, linking Bradfield to the remainder of the Aerotropolis Core (and further east to Kemps Creek and Austral) should be identified with road corridor designs that provide continuity and amenity in line with the Western Sydney Street Design Guidelines.	Linkages to the wider Aerotropolis and road cross-sections are detailed in the Western Sydney Aerotropolis Precinct Plan to achieve consistency.

Key Theme/ Issue	Comment/ Recommendation	Response
Infrastructure Funding	The Master Plan must include sufficient detail in relation to development contribution considerations noting that at this time a contributions plan has not been finalised for the Western Sydney Aerotropolis.	<p>BDA is currently preparing a Planning Agreement (PA) which will identify all infrastructure to be delivered as part of Phase 1 of the Master Plan delivery program.</p> <p>The BDA will be responsible for providing local and state infrastructure within Stage 1 consistent with its obligations under the relevant contribution plans.</p> <p>BDA have instigated discussions with DPHI, as the approval authority for SSDAs, in relation to State Contribution and Local Contribution requirements in the absence of an approved Section 7.12 Plan. It is anticipated that this agreement will be concluded within a 12 month period.</p>
Site Specific DCP	<p>Any DCP applying to the site is to include:</p> <ul style="list-style-type: none"> Road classification and administrative responsibilities for various types of roads including Badgerys Creek Road, Metro Link, sub-arterial road, transit boulevard, collector street, local street and pedestrian/active links including ownership, delivery mechanism and maintenance responsibility. 	<p>The Master Plan includes cross sections for each road type.</p> <p>All roads within Stage 1 will be delivered by BDA with the exception of two location roads which are within Superlots and will be delivered by the BDA's development partners.</p> <p>Delivery of roads beyond Stage 1 will be subject to further investigation, funding and demand drivers.</p> <p>All roads within the Bradfield City Centre are intended to be dedicated to Council for ongoing management subject to their agreement.</p> <p>BDA is currently preparing a PA which will identify all infrastructure to be delivered as part of Phase 1 of the Master Plan delivery program.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<ul style="list-style-type: none"> The proposed public transport and active transport network, intersection treatment, street pavement treatments, street furniture design and pedestrian/cyclist links traffic calming devices and pedestrian crossings. 	<p>The Master Plan includes diagrams setting out the public transport and active transport networks.</p> <p>BDA is also preparing a Public Domain Strategy which will detail pavement treatments, landscaping and street furniture. This has been referenced in the Master Plan.</p> <p>TfNSW is currently developing a Bradfield City Centre Access and Servicing Plan in consultation with Liverpool City Council, and this is reflected in the Master Plan.</p> <p>This will detail intersection treatments, pedestrian/cyclist links traffic calming devices and pedestrian crossings.</p> <p>Future DAs will be required to demonstrate compliance with this document through a Master Plan site-specific development control.</p>
	<ul style="list-style-type: none"> An overarching parking management strategy which clarifies the overall parking provision measures for all users within the Bradfield City Centre including car shared service, shared car park and loading facility, EV charging stations and other micro-mobility parking facilities. 	<p>Car parking requirements are set out in the Western Sydney Aerotropolis DCP. This includes for loading, car share and EV spaces.</p> <p>The Travel Demand Strategy being prepared will consider parking management across the Master Plan.</p>
	<ul style="list-style-type: none"> An outline of traffic impact assessment requirements for staged development. 	<p>Traffic impact assessment will be required for all DAs.</p>
	<ul style="list-style-type: none"> Specific controls for any proposed waste and loading facilities. 	<p>Waste management and loading for future developments will need to be in accordance with the Western Sydney Aerotropolis DCP.</p>
	<ul style="list-style-type: none"> Green travel plan requirements, including realistic mode share targets over the next 30 years and associated travel demand management measures. 	<p>Future DAs will need to be in accordance with the site-specific development control that has been included in the Master Plan.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<ul style="list-style-type: none"> A requirement and the relevant guide/framework for government, business, school, and other developments to develop and prepare a green travel plan as well as an overall evaluation process for the implementation of green travel plans to review public transport and active transport usages. Possibly a link to an online green travel plan lodgement platform to monitor transport usage within the Bradfield City Centre. 	<p>Future DAs will need to be in accordance with the site-specific development control that has been included in the Master Plan.</p> <p>This is outside the scope of the Master Plan.</p>
Affordable Housing	The Master Plan should set a benchmark for delivery of affordable housing, and it is recommended that clear targets are set.	The Master Plan has been amended to set out that affordable housing will be provided in accordance with relevant Government policy.
Future School Sites	<p>The Social Infrastructure Strategy recommends provision of a public primary and high school to accommodate the demographic needs of the Aerotropolis Core precinct.</p> <p>However, the Master Plan seeks to amend the Precinct Plan to delete sites reserved for 'education' and 'special infrastructure.</p> <p>It is recommended that the Master Plan retain the future school sites.</p>	<p>While the BDA proposes to remove the spatial location of sites identified as 'Special Infrastructure' and 'Education' in the Western Sydney Aerotropolis Precinct Plan from the Master Plan, the Master Plan commits to providing social infrastructure and a future primary and high school, with locations to be determined.</p> <p>The area shown in the Precinct Plan as 'Education' is in a future stormwater catchment area for development within the Master Plan, and not considered appropriate for a school site. The future location of the school site/s will be subject to due diligence and consultation with Schools Infrastructure NSW as service needs are better understood.</p> <p>The BDA will continue to work with Schools Infrastructure NSW to determine and finalise an appropriate location for a future primary and high school prior to the next Master Plan review in 5 years' time.</p>
Community Health Centre	The Master Plan identifies an opportunity to provide one Community health centre/IHUB in the Aerotropolis Core after the year 2031.	Health Infrastructure have advised BDA that funding has been obtained to work on a business case to establish a

Key Theme/ Issue	Comment/ Recommendation	Response
	The Indicative Layout Plan should reserve land for health facilities.	<p>health facility of some form within the Western Sydney Aerotropolis Precinct.</p> <p>The first stage of the process involves the two Local Health Districts – South Western Sydney and Nepean Blue Mountains carrying out a service needs analysis to determine the service needs of the area.</p> <p>The BDA will continue to work with Health Infrastructure NSW to determine if Bradfield City Centre is an appropriate location for a future health facility prior to the next Master Plan review in 5 years' time.</p>
Retention of Social Infrastructure	<p>The Indicative Layout Plan does not identify and reserve land for key social infrastructure.</p> <p>It is recommended that school sites, recreation precincts and key social infrastructure are retained within the Master Plan.</p>	<p>The BDA will continue to work with Council and the relevant agencies regarding social infrastructure.</p> <p>Land will not be reserved for these purposes until proper site due diligence to determine whether the site is appropriate has been carried out.</p>
Aquatic Centre	<p>The Master Plan Social Infrastructure Strategy recommends one indoor aquatic/swimming facility to accommodate the requirements of both master plan site and Aerotropolis Core precinct demographic needs (pg. 7).</p> <p>The artist's impression and ILP in the Master Plan report (pgs. 135 & 149) signify that the proposed Moore Gully Swimming Pool will not be an aquatic centre.</p> <p>It appears that it will be a recreational swimming hole/swimming zone or a tourism venue rather than traditional aquatic centre that provides learning to swim programs, hydrotherapy, and gymnastic facilities.</p> <p>Clarification is required as to whether the Moore Gully Swimming Pool will be an aquatic centre.</p>	<p>The swimming area proposed for Moore Gully is an outdoor recreation area leveraging features of the natural waterway and not planned as an indoor aquatic centre at this stage.</p> <p>A separate indoor leisure centre (3,000m²) is proposed within the broader Aerotropolis Core Precinct in Council's contribution plan, with a location yet to be determined.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
Environmental Health	The Air Quality Impact Assessment did not evaluate the potential impact of aircraft emissions on future occupants of the Bradfield City Centre.	This will be subject to future DAs.
Public Art	<p>Council recommends that the Arts and Cultural Strategy is updated to identify or address all the key items in section 4.6.3 of the Western Sydney Aerotropolis Plan (2020). The Strategy should also be brought into line with the Master Plan Requirements by:</p> <ul style="list-style-type: none"> • Demonstrating consistency with the Western Sydney Aerotropolis Development Control Plan (DCP) and Recognise Country. • Ensuring that where it does not align with the Aerotropolis Precinct Plan that it provides for a superior planning outcome by meeting the criteria specified in the Guidelines. • Ensuring Technical Assurance Panel (TAP) recommendations are implemented. • Demonstrating consistency with other submitted Master Plans for Bradfield. • Acknowledging and reflecting the Aboriginal Cultural Heritage Assessment Report. • Providing insight into consultation undertaken with Liverpool City Council and communities within the Liverpool local government area (LGA) in relation to the development of this Plan. <p>Council requires clarification regarding:</p>	<p>Section 4.6.3 of the Western Sydney Aerotropolis Plan 2020 states that: <i>Public art, public spaces such as art galleries, museums and libraries and the new cultural infrastructure will support the ambition for the Aerotropolis to be a home for science and education. Co-locating artistic and creative organisations in science and education precincts will encourage collaboration, drive enterprise and innovation, and support the development of creative industries.</i></p> <p>This is addressed for Bradfield City Centre through the Arts and Cultural Strategy.</p> <p>The Western Sydney Aerotropolis Precinct Plan does not include provisions relating to public art, however the Western Sydney Aerotropolis DCP requires public art to be provided for all developments on sites over 20 hectares or with an estimated development cost exceeding \$20 million.</p> <p>No changes are proposed to the public art provisions under the Aerotropolis DCP, and the Master Plan has been amended to clarify this.</p> <p>The Master Plan includes a site-specific control to ensure that in addition to the Western Sydney Aerotropolis DCP, future DAs will be required to have consideration of the Art and Culture Strategy Report.</p> <p>The Art and Culture Strategy Report has been amended to refer to BDA rather than ‘the Authority’.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<ul style="list-style-type: none"> Whom the 'Authority' is in relation to this Strategy and to be provided the 'arts and culture strategy' to ensure alignment, implementation, and management of public art within Bradfield. In relation to Early Engagement and Embedding Artists Council requires clarity on how identified deliverables will be made and who will be responsible for implementation and completion, with an emphasis on requirements under the Aerotropolis DCP. Council request clarification on how the Strategy will deliver Artists Residencies across the site. Will this be incorporated for private as well as Federal, State or Local developments? Who has been identified as responsible for this outcome? Clarity is sought on how this will be implemented and maintained. Strategy does not reference the Bradfield City Centre Master Plan Application Aboriginal Engagement Outcomes Report. Council request further information on how the Guiding Artistic Narratives were identified and if these were developed through community engagement or consultation. 	<p>The Arts and Culture Strategy builds on the provisions of the Western Sydney Aerotropolis DCP by identifying cultural facilities as well as additional locations for public art within the public domain and Government led developments.</p> <p>The implementation of the Arts and Culture Strategy is subject to decisions on funding allocation. The Master Plan has been updated to require that future DAs are to consider the Bradfield City Centre Arts and Culture Strategy.</p> <p>The Art and Culture Strategy Report confirms that it is important to prioritise First Nation artists from the region where possible.</p> <p>Work was undertaken by consultant Artificer Projects and BDA to inform the Art and Culture Strategy Report.</p> <p>The background studies consulted with extensive with representatives across both Western Sydney and Eastern Harbour City, including LCC, urban planners, interpretative, landscaping and architectural work streams.</p> <p>Additionally, refer to the Aboriginal Outcomes report regarding consultation on the Bradfield City Centre Master Plan.</p>
	<p>The Art Strategy does not reference, propose consistency with or exceed relevant provisions within the Aerotropolis Development Control Plan.</p>	<p>The provisions of the Western Sydney Aerotropolis DCP in relation to public art would continue to apply.</p> <p>The Arts and Cultural Strategy builds on the provisions of the Western Sydney Aerotropolis DCP.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	As such it appears that the Art Strategy does not achieve what is required as outlined in the DCP 2.1 Recognise Culture, 2.19 Public art, 6.1 Social and Cultural Infrastructure Controls.	
	Council requested a series of amendments to the wording and terminology within the Art Strategy including in relation to First Nations.	The Arts and Cultural Strategy has been reviewed and updated as appropriate. Refer to Appendix 4 for the amended Arts and Cultural Strategy.
	Commitments: <ul style="list-style-type: none"> • Council recommends a clear commitment to ensuring public art and culture are embedded into the fabric of the City. • The Strategy identifies that “There is a clear need of purpose-built cultural infrastructure in Western Sydney with a staged approach to the infrastructure plan to adjust”. This should rather be listed as a commitment within the Strategy. 	The Public Art requirements of the Western Sydney Aerotropolis DCP will continue to apply. The Master Plan has been updated to require that future DAs are to have consideration for the Bradfield City Centre Arts and Culture Strategy.
	Blue and Green Grid: <ul style="list-style-type: none"> • Council recommends that the Art Strategy address opportunities to promote and activate the Green and Blue Grid through the incorporation of public art. The strategy currently does not identify the Grid, in doing the strategy will support and encourage healthy active living for residents, workers and visitors • The Strategy should address opportunities to promote and activate the Green and Blue Grid through the incorporation of public art. This will support and encourage healthy active living for residents, workers and visitors. 	The Arts and Culture Strategy identifies opportunities for public art within the public domain at Bradfield City Centre which are aligned with the blue and green grid.
	Consultation: <ul style="list-style-type: none"> • Council recommends that consulting with Local Government is acknowledged and that the relationship to the site within the broader context of the geographical area, including the Liverpool LGA is identified. This will ensure that the Art Strategy is relevant 	Between July and August 2020 stakeholder consultation was undertaken with 55 key stakeholders with representatives from government, business, and the arts sector.

Key Theme/ Issue	Comment/ Recommendation	Response
	<p>beyond the City Centre footprint and acknowledges it's historical, social, cultural and economic contexts.</p> <ul style="list-style-type: none"> • In line with the Bradfield City Centre Masterplan Application; Aboriginal Engagement Outcomes Report (AEOR) identification of opportunities for Dharug artists are prioritised in line with priorities undertaken through consultation. • Council recommends the Art Strategy commits to meaningful and ongoing consultation with existing communities and prioritises communities within the LGA. • Council recommends that the Art Strategy commits to narratives that are meaningful and endemic of the area and that artworks foster these unique stories for all artwork delivery. 	<p>The findings from this consultation contributed to the development of the Arts and Culture Strategy and support the Master Planning of Bradfield City Centre. Three local government Councils, Campbelltown, Camden, and Liverpool were included in the consultation and involved in the development of the Art Strategy.</p> <p>The Arts and Culture Strategy recommends establishing an Arts and Culture Advisory Panel (Panel) to assist BDA in the implementation of the art strategy.</p> <p>In June 2023, the Panel was established with five Panel members and one Chairperson. The Panel representatives have been strategically engaged to provide subject matter expertise in a range of art and culture practices and who are embedded in the Western Sydney creative sector.</p> <p>The Panels role includes:</p> <ul style="list-style-type: none"> • Provision of high quality, expert advice to the Authority on the approach to the development and delivery of public art, cultural, civic and community programs, including the development of concepts and ideas for cultural infrastructure, public art, and cultural programs. • Advising the Authority on the integration of high-quality art and cultural, civic and community experiences into the site.
	Site Specific Development Controls (SSDC)	The Western Sydney Aerotropolis DCP includes provisions that where public art is required, it is to be

Key Theme/ Issue	Comment/ Recommendation	Response
	<ul style="list-style-type: none"> • Council recommends that in line with the Bradfield City Centre Master Plan, that the SSDC of the Strategy identifies Ground Level Active Frontages as a public art opportunity. • Council recommends that in line with the SSDC the Strategy identifies the Central Park public artwork relationship with WSA Metro Station. 	<p>provided within the publicly available and accessible spaces of the development such as:</p> <ul style="list-style-type: none"> • Any frontage to the public domain • Building entrances • Arcades and through site links. <p>These provisions will ensure that public art is aligned with active frontages. Public art in Central Park will be located in the North-east corner of Central Park, which is on the opposite side of the Park from the Metro entrance.</p> <p>Sydney Metro confirmed the location of their commissioned artwork would be situated on the plaza level, between the North and South entrance to the Metro.</p> <p>There is no direct connection between the BDA commissioned artworks and the Sydney Metro artwork.</p> <p>This has been discussed and agreed with Sydney Metro.</p>
	<p>Local Artists</p> <ul style="list-style-type: none"> • The Strategy should focus on the promotion and prioritisation of local artists with direct connections to the Liverpool LGA (i.e., lead artist, paid collaborations to provide legacy building). This is critical to support local economic, social and cultural opportunities for building and supporting creative industries. 	<p>The Strategy will provide opportunities for Western Sydney artists/creatives to assist in shaping the cultural landscape of Bradfield City Centre.</p> <p>The BDA’s Arts and Cultural Panel engaged are assisting BDA in developing these opportunities and providing access to Western Sydney networks.</p>
	<p>Delivery</p> <ul style="list-style-type: none"> • The Strategy should identify who will deliver public art within Bradfield (i.e., Sydney Metro, WSPA, private developers). This will assist in aligning the document with clear deliverables. 	<p>BDA currently has enabling works and early building funding for Stage 1 Master Plan delivery and is incorporating public art into a number of its projects.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
		<p>It will work with its development partners to support the delivery of public art provision and programming that contribute to early activation at Bradfield City Centre.</p> <p>Sydney Metro will deliver artworks associated with works on their station frontage.</p>
<p>Flood plain engineering</p>	<p>Integrated Water Cycle Management</p> <p>Stormwater drainage network/underground pits and pipes were designed for individual sub-catchments. These pits and pipes accommodate flows only for minor events i.e., 20% AEP event. In case of storm events larger than 20% AEP, the catchment contributing flow at some of the streets will be more than 15Ha.</p> <p>This triggers a requirement for trunk drainage system along streets. Based on the pit and pipe network, the following are possible locations where the combined contributing catchment contribution overland flow to street would be more than 15Ha:</p> <ul style="list-style-type: none"> • Eastern side of P2 where flow will be contributed from catchment P1 and P2. The catchment contributing overland flow over the street would be the combination of P1 and P2. • Street at Catchment P4 could potentially receive overland flow from P1, P2 and P3. • Street at P6 could potentially receive overland flow from P1 to P5. • Street at P8 potentially receive overland flow from P5. • 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>Bradfield City Centre has been designed as a parkland city and incorporates extensive stormwater basins along Moore Gully and Thompsons Creek to achieve the blue-green loop vision set out in the Western Sydney Aerotropolis Precinct Plan.</p> <p>The preliminary stormwater catchment strategy submitted in support of the Master Plan currently indicates that there are no catchments >15ha and demonstrates that the runoff up to the 1% AEP can be conveyed between the kerbs along streets in accordance with the standard requirements of the Australian Rainfall and Runoff Guidelines.</p> <p>As such, the Master Plan is in accordance with the Western Sydney Aerotropolis DCP requirements.</p> <p>The use of naturalised drainage channels in a high density, urban area such as the Bradfield City Centre is not appropriate due to the volume of pedestrian and active transport movements across the City Centre and the likely number of access/egress points from buildings.</p> <p>Overall, the stormwater drainage network proposed as part of the Master Plan is appropriate given the nature of the site and still achieve Stormwater, Water Sensitive Urban Design, and Integrated Water Management</p>

Key Theme/ Issue	Comment/ Recommendation	Response
Natural Environment	<p>Moore Gully and the extent of impacts should be further addressed due to the proposed realignment of this waterway. It seems the only proposed change for stage 2 is the consideration of water basin parameters. Impacts to biodiversity are not restricted to water basin parameters and would therefore still be pertinent and not addressed.</p> <p>Impacts to Environment and Recreation (ENZ) zoned land within Moore Gully and various infrastructure and recreational facilities that are being proposed have not yet been properly addressed as per the previous comments. Impacts within the Environmental Zones and the Biodiversity Values zones should be further addressed.</p> <p>There are insufficient details included in the updated Biodiversity Strategy and Impact Assessment (BSIA) on both the impacts and the extent of impacts within the ENZ zoned areas. Particularly, surrounding the impacts associated with realignment of Moore Gully.</p> <p>Impacts within Moore Gully and within the vicinity of Ridge Park are still going to occur, further information should be provided demonstrating how impacts on existing native vegetation will be avoided.</p>	<p>objectives and requirements contained within the Western Sydney Aerotropolis DCP.</p> <p>Relocation of Moore Gully was supported through TAP Workshop 1 and in principle agreement through the TAP Endorsement.</p> <p>The proposed realignment of Moore Gully is not within the scope of this Master Plan and will be assessed under a separate approval process.</p>
	<p>The Planning Report (pg. 59) indicates that future DAs seeking clearing of native vegetation under Clause 4.25A of the <i>State Environmental Planning Policy (Precincts – Western Parkland City) 2021</i> could be subject to merit assessment. However, Clause 4.25A does not permit the clearing of native vegetation, rather it states that “Development consent must not be granted to development on the land unless the consent authority is satisfied that the development will not result in clearing of native vegetation”. Clearing of native vegetation can only be undertaken by a public authority (or person acting on behalf of a public authority) in limited circumstances.</p>	<p>Noted. The Master Plan does not propose any changes to these provisions.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<p>The Earthworks Plan (pg. 29) states that “Thompsons Creek – considered to be a key fish habitat and is likely to have a key fish habitat buffer of 50m. Liaison with DPI Fisheries and the NSW Natural Resources Access Regulator (NRAR) is required if works are to be undertaken within the inner 50% of the 40m riparian buffer on both sides of the watercourse.” It is advised that relevant agencies should be consulted, regardless of whether the inner 50% is impacted.</p>	<p>Consultation with the appropriate approval authority will be carried out at development application stage in accordance with the provisions of the <i>Water Management Act 2000</i>.</p>
SP2 Zone Impacts	<p>The Master Plan does not propose permanent development in the existing 60m wide Special Purposes 2 (SP2) Infrastructure Zone corridor. However, the transport infrastructure corridor splits the Aerotropolis core into two and concerns are raised regarding the SP2 zone's impact on the precincts' connectivity. Particularly, it is unclear as to how the rail corridor impacts on the proposed active transport network, as the corridor cuts several pedestrian priority lanes (shared zone or car-free lanes) and safe cycling streets.</p>	<p>Chapter 4 of the <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> is in the process of being amended.</p> <p>It will include additional provisions to allow the temporary use of corridor land.</p> <p>The amendment will facilitate economic, urban design and place making outcomes on corridor land prior to infrastructure delivery.</p> <p>The Master Plan does not propose permanent development in the Transport Infrastructure Corridor.</p> <p>The design of the rail corridor is outside the scope of the Master Plan.</p> <p>A decision regarding future rail infrastructure in the corridor is the subject of review by the NSW Government.</p>
Design Excellence	<p>The Design Excellence Strategy (pg. 12) does not include any objectives or controls for development within the vicinity of the public domain.</p> <p>It is recommended that the design excellence strategy includes objectives and controls for the public domain to ensure the project delivers an integrated approach to streetscape, landscape and building</p>	<p>The Design Excellence Strategy has been amended to specifically require that future development includes consideration of the adjoining public domain.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	design so that there is a cohesive environment where people's safe movement is a priority. The new objectives and controls must be addressed in part 5-Design Excellence of the Bradfield City Centre Draft Master Plan Site Specific Development Controls Documents.	<p>Furthermore, existing GANSW guidelines require that concept and stage 1 DAs are completed for large sites that include built form and public domain elements.</p> <p>A Bradfield City Centre Public Domain Strategy is currently being prepared by the BDA in consultation with Liverpool City Council.</p> <p>The strategy will contain clear objectives regarding public domain treatments within Bradfield City Centre.</p> <p>It will be referenced in the site-specific development controls contained in the Master Plan.</p>
Intersection Treatments	The urban design report does not include intersection treatments. New controls for intersection treatments must be included in the Master Plan.	<p>Chapter 9 movement within the Master Plan Report contains typical plan and section for the different street types within the Master Plan.</p> <p>TfNSW is currently developing an Access and Servicing Plan for Bradfield City Centre in consultation with Liverpool City Council and the BDA.</p> <p>This is reflected in the Master Plan document. It will detail intersection treatments.</p>
Tree Canopy Target	Whilst the Master Plan complies with the overall 40% tree canopy target set on the Aerotropolis Precinct Plan, a significant reduction of the in-lot tree canopy target percentage from 25-35% to 15% is not supported. Revised targets must be addressed in the Master Plan.	<p>The Master Plan for Bradfield City Centre provides a different composition of lots, streets, and open space to the urban typologies outlined within the Western Sydney Aerotropolis DCP.</p> <p>The Master Plan sets out alternative benchmark solutions to the current tree canopy controls that apply to the site and establishes specific controls for individual lots, street types and open space areas.</p> <p>The alternative controls proposed can achieve an</p>

Key Theme/ Issue	Comment/ Recommendation	Response
		<p>average canopy cover of 42% across the entirety of the site which exceeds the 40% target under the Aerotropolis Precinct Plan.</p> <p>The proposed controls are appropriate given the nature of the site and still achieve the objectives of Clause 2.4.1 which is to provide sufficient space for sustainable tree growth to increase the canopy cover across the Aerotropolis precinct.</p>
	<p>The Bradfield City Centre Master Plan does not achieve the Precinct Plan solar access requirements to Local Parks and proposes a minimum of 3hrs of solar access between 9 am and 3 pm on the 21st of June for 50% of the open space consistent with the Liverpool DCP requirements (pg. 315).</p> <p>Yet, in a greenfield site with no existing built environment, the minimal 70% solar access requirement should be maintained to ensure the open spaces thrive.</p>	<p>The Western Sydney Aerotropolis DCP requires a minimum of 3 hours' solar access between 9am and 3pm on the 21st of June to a minimum 70% area of open space.</p> <p>The shadow analysis shows that this requirement will be met for District and Regional Parks. This includes all parks identified in the Precinct Plan, as well as Central Park.</p> <p>The Master Plan identifies additional Local Parks. For Local Parks to achieve this metric it would significantly restrict density and built form objectives.</p> <p>For these smaller urban spaces, an alternative target is proposed of 3 hours' solar access between 9am and 3pm on the 21st June to a moving 50% area of open space. This is consistent with the Liverpool City Council DCP requirement for new parks in the Liverpool City Centre.</p>
Deep Soil	A minimum size or area of deep soil in metrics has not been provided. It is recommended that minimum areas be specified in more than just a percentage to ensure the minimum dimensions adequately support the growth of mature trees and landscaping.	The Master Plan proposes that all individual development sites are to provide deep soil of at least 10% of the site area.

Key Theme/ Issue	Comment/ Recommendation	Response
Waste Management	Council is supportive of the various Parks and Open Spaces proposed but would like to ensure that the servicing requirements for the litter bins that those parks and open spaces have been considered.	This is higher than the deep soil percentage proposed within the ADG. A minimum area is not required to be specified. This is beyond the scope of the Master Plan and will be subject to consideration in future DAs.
Impact on Liverpool City Centre	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>The Western Sydney Aerotropolis Plan identifies three main centres.</p> <p>Bradfield City Centre is positioned to be the major centre within the Aerotropolis Core Precinct and as part of the wider Western Sydney Aerotropolis. The Bradfield City Centre is zoned for mixed use development under the Western Parkland City SEPP.</p> <p>The Master Plan does not propose to change the zoning or the development potential from that established in the Western Sydney Aerotropolis Precinct Plan.</p> <p>The intended uses for the City Centre include a mixture of commercial, research and development, community, retail and education land uses.</p> <p>This diversity of employment in the City Centre supports the objectives of the Western Sydney Aerotropolis Plan for the Aerotropolis Core as a key employment centre in Western Sydney, aligned with the Western City District Plan and Precinct Plan.</p> <p>The Bradfield City Centre contributes approximately half of the jobs targeted for the Aerotropolis Core precinct with a focus on knowledge intensive jobs.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
		<p>A mix of both retail and residential within the Western Sydney Aerotropolis will encourage a vibrant and active community to live and work, particularly retail as it will support employment and accommodate population growth.</p> <p>The development of the city centre will consider the context for the broader development of Western Sydney and look to leverage its advantages in proximity to Western Sydney International Airport and the access provided by Sydney Metro – Aerotropolis Station. Whilst Bradfield City Centre is likely to attract businesses associated with the establishment industries in the Western Sydney Aerotropolis – particularly related to advanced manufacturing, Liverpool and Penrith are the major regional centres for retail, community and civic functions and are likely to retain these advantages over Bradfield.</p>
Smart Cities Approach	The Smart Cities Report identifies aspirational goals to support a Smart City. However, there is very little detail surrounding funding, future locations, and ongoing maintenance of such assets. It is recommended that these aspects be explored in more detail.	<p>Detailed smart cities infrastructure and operations is beyond the scope of the Master Plan.</p> <p>This will be subject to future DAs and handover arrangements.</p>
Heritage Impact	A heritage interpretation strategy has not been submitted as part of the Master Plan. It is recommended that the application should not be approved until the interpretation strategy has been drafted.	<p>The preparation of a Heritage Interpretation Strategy was not a Master Plan requirement.</p> <p>The Aboriginal Cultural Heritage Assessment Report has recommended that a Heritage Interpretation Strategy be prepared in consultation with the relevant stakeholders.</p>

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4.1.2 Council – Penrith City Council

Table 4 below outlines the comments and issues raised by Penrith City Council and the associated responses by the BDA.

Table 4 Penrith City Council Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Master Planning Process	<p>Council highlighted that it has no significant concerns regarding the draft master plan or supporting technical studies but seeks to provide feedback on high-level matters regarding master-planning processes.</p> <p>General comments regarding the Master Planning Process.</p> <ul style="list-style-type: none"> - Requested that DPHI consult with Council before any future master plan request is submitted in the Penrith LGA and that Council is included in all pre-lodgement discussions. - Council sought clarity regarding the statutory status of any approved master plan, including who is responsible for administering and ensuring compliance with the master plan, the process for varying a master plan, including if this can be done via a future development application, and who has the authority to vary a master plan. Requested consideration of the benefits of the master-planning pathway against cost, time and resource commitments from key stakeholders and noted that an alternative pathway may be more suitable in some circumstances. 	<p>These matters relate to master planning more generally as matters for DPHI and fall outside the scope of the Bradfield Master Plan.</p>
Infrastructure and Contributions	<p>Finalisation of the contribution's framework is a priority for Council and master plans should not be finalised until the contribution's framework is in place.</p>	<p>The Draft Liverpool City Council s7.12 Aerotropolis Contribution Plan 2023 has been issued to the Department for assessment and Ministerial approval.</p> <p>There is no requirement in legislation that specifies that a Master Plan is not to be approved until the contribution's framework is in place.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<p>Under the draft Bradfield Master Plan, any public works outside of a State or local contribution plan are proposed to be secured in a Voluntary Planning Agreement (VPA).</p> <p>It is not clear who the VPA would be with, it is assumed that it would be an agreement between Liverpool Council and the State government as landowner.</p> <p>Concerns are raised regarding the mechanism for the delivery of infrastructure in the Aerotropolis. Concern is raised that the master plan will raise community expectations for these facilities to be delivered, however, there is still no certainty of funding and delivery timeframes.</p>	<p>Under BDA's proposed Planning Agreement there would be no requirement for infrastructure to be provided by Liverpool City Council in Phase 1 of the Bradfield City Centre.</p> <p>Concerns regarding the mechanism for the delivery of infrastructure in the wider Aerotropolis is a matter for DPHI and local councils.</p>
	<p>Specific concern is raised regarding the proposed shifting of costs for certain stormwater infrastructure from Sydney Water to Council. All identified infrastructure to be linked to a specific funding source and ownership/maintenance should be agreed upon before the draft master plan is finalised.</p>	<p>The proposed stormwater catchments in the Master Plan are in accordance with the Western Sydney Aerotropolis DCP, therefore BDA does not believe that there is any stormwater infrastructure being shifted from Sydney Water to local councils.</p> <p>The Western Sydney Aerotropolis regional stormwater network will be managed and maintained by Sydney Water. This will be subject of a separate agreement with Sydney Water.</p>
<p>Housing and Productivity Contribution (HPC)</p>	<p>It is understood the Special Infrastructure Contribution (SIC) for the Western Sydney Aerotropolis will be transitioned to the Housing and Productivity Contribution (HPC) in 2026.</p> <p>Further clarity is needed to understand what funding will be available for state and regional infrastructure in the Aerotropolis Precinct once this area is transitioned to the HPC.</p>	<p>This is beyond the scope of the Bradfield City Centre Master Plan.</p>
<p>Provision of infrastructure</p>	<p>While Council appreciates that the master plan process only applies to certain land, the timely and orderly provision of facilitating infrastructure is critical for the success of the Aerotropolis. The cost of</p>	<p>This is beyond the scope of the Bradfield City Centre Master Plan.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<p>the majority of infrastructure within the SIC will not be covered entirely by the SIC. This does not provide certainty in respect to the deliverability of this infrastructure, nor explain how master planned sites will be connected to the broader network.</p> <p>We seek to further work with State and Federal government to ensure that all infrastructure required to deliver the Aerotropolis can be funded, and the delivery mechanism and responsible authority identified to ensure delivery in a timely manner. This will also assist in the preparation of future master plans as funding certainty will enable the progression of development in a timely manner.</p>	<p>This is beyond the scope of the Bradfield City Centre Master Plan.</p>
<p>Strategic Context</p>	<p>It is not clear how Bradfield will interrelate and build on the cohesion of the existing centres within the Metropolitan Cluster.</p> <p>We seek further clarification in the Master Plan the role Bradfield will play as part of the Metropolitan Cluster.</p>	<p>The Western Sydney Aerotropolis Plan identifies three main centres.</p> <p>Bradfield City Centre is positioned to be the major centre within the Aerotropolis Core Precinct and as part of the wider Western Sydney Aerotropolis.</p> <p>The Bradfield City Centre is zoned for mixed use development under the Western Parkland City SEPP. The Master Plan does not propose to change the zoning or the development potential from that established in the Western Sydney Aerotropolis Precinct Plan.</p> <p>The intended uses for the City Centre include a mixture of commercial, research and development, community, retail and education land uses. This diversity of employment in the City Centre supports the objectives of the Western Sydney Aerotropolis Plan for the Aerotropolis Core as a key employment centre in Western Sydney, aligned with the Western City District Plan and Precinct Plan.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
		<p>The Bradfield City Centre contributes approximately half of the jobs targeted for the Aerotropolis Core precinct with a focus on knowledge intensive jobs. A mix of both retail and residential within the Western Sydney Aerotropolis will encourage a vibrant and active community to live and work, particularly retail as it will support employment and accommodate population growth.</p> <p>The development of the City Centre will consider the context for the broader development of Western Sydney and look to leverage its advantages in proximity to Western Sydney International Airport and the access provided by Sydney Metro – Aerotropolis Station.</p> <p>Whilst Bradfield is likely to attract businesses associated with the establishment of industries in the Western Sydney Aerotropolis – particularly related to advanced manufacturing, Liverpool and Penrith are still considered to be major regional centres for retail, community and civic functions and are likely to retain these advantages over Bradfield.</p>

4.1.3 Council – Wollondilly Council

Table 5 below outlines the comments and issues raised by Wollondilly Council and the associated responses by the BDA.

Table 5 Wollondilly Council Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Transport Connections	Advocacy for district level transport infrastructure including significant public transport investment and both state and regional road network expansion to connect the City Centre with the surrounding area.	Transport Infrastructure Corridor zoned SP2 will be retained and preserved for future transport links. Transport connections beyond the site are not within the scope of the Master Plan.

4.1.4 Western Sydney Airport

Table 6 below outlines a summary of the key comments and issues raised by Western Sydney Airport and the associated responses by the BDA.

Table 6 Western Sydney Airport Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Protected Airspace	Any proposal for long term intrusions into protected airspace will need to be separately assessed and determined under Commonwealth legislation in accordance with the Airports Act 1996 and the Airports Report (Protection of Airspace) Regulations 1996.	Noted. This is a standard legislative requirement which is also reflected in the Western Parkland City SEPP.
	Given the Master Plan enables variations to the maximum height limits, the site-specific planning controls in Aerotropolis Development Control Plan (DCP) should be amended to require early consultation with Western Sydney Airport.	Prescribed Airspace is the airspace above either an Obstacle Limitation Surface (OLS) or Procedures for Air Navigational Services – Aircraft Operations (PANS-OPS) surface.
	For any development that proposes to impact on protected airspace or the safe operation of the airport, a detailed aviation impact assessment for such development would be required.	Under Section 182 of the Airports Act 1996, activities that result in intrusions into an Airport’s Prescribed Airspace are called ‘controlled activities’ and cannot be carried out

Key Theme/ Issue	Comment/ Recommendation	Response
	The Master Plan (or DCP) should also note that long term intrusions into the PANS-OPS cannot be approved under the Commonwealth legislation.	<p>without approval. These provisions are also referenced in the Western Parkland City SEPP.</p> <p>Due to the airspace restrictions of Western Sydney International Airport, the site has an OLS height limit of RL125.5 AHD. The PANS-OPS has not been released.</p> <p>The Western Sydney Aerotropolis Precinct Plan has adopted maximum height limits which are within the OLS.</p>
Wildlife Management	Given the proximity of the Bradfield City Centre to the Airport, Western Sydney Airport requests the opportunity for further consultation to discuss measures to mitigate or manage wildlife attraction.	<p>The Western Parkland City SEPP requires consideration of risk of wildlife to the operations of the airport including in consultation with the relevant Commonwealth body for development within the 13m buffer zone which includes the Bradfield City Centre.</p> <p>The Western Sydney Aerotropolis DCP also includes controls relating to minimising wildlife hazards.</p>
	Western Sydney Airport would also like the opportunity to consider the future major events to be held in public open spaces to ensure there are appropriate mitigation measures in place to minimise wildlife attraction.	The Master Plan has been amended to remove any changes to the exempt development provisions for major events.
Regional Stormwater Network	It is noted that Bradfield City Centre will connect to the Aerotropolis regional stormwater network that will be managed and maintained by Sydney Water. Western Sydney Airport have previously engaged with Sydney Water, particularly on the stormwater basin design and minimising wildlife attraction. Western Sydney Airport would welcome further engagement with the Bradfield Development Authority regarding future applications for Bradfield and the design of these basins.	<p>The regional stormwater basins are subject to a separate detailed design and approval process.</p> <p>Consultation with Western Sydney Airport will be undertaken as appropriate at a relevant time.</p> <p>The detailed design of the stormwater basins will be in accordance with Sydney Water standards as Sydney Water will own the asset.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
Transport and Connectivity	<p>Western Sydney Airport also noted that some of the network modelled, and bus routes detailed in the Transport Management Accessibility Report show the use of the northern section of Badgerys Creek Road into the long term.</p> <p>The use of Badgerys Creek Road (BCR) within the airport site as part of the long-term street hierarchy and traffic network should not be relied upon as from around 2028, WSI will target closing BCR (north of Badgerys Creek to private vehicles.</p> <p>Western Sydney Airport will consult with the Australian and NSW governments and Liverpool Council in relation to a closure date for the road. Further consultation will be required in relation to alternative access routes, particularly regarding the timing of the construction and opening of the proposed Eastern Ring Road.</p>	<p>The Traffic Management Accessibility Report was prepared by BDA in conjunction with Transport for NSW and local councils.</p> <p>This report was prepared using the WSAGA model outputs (Figure 54) and Western Sydney Rapid Bus Project Modelling Report outputs (Figures 40-42).</p> <p>These outputs were provided by TfNSW to inform the operational modelling exercise to determine the impacts on the surrounding road network.</p> <p>These models do not propose the long-term use of Badgerys Creek Road within the airport site.</p>

4.1.5 Sydney Metro

Table 7 below outlines a summary of the comments and issues raised by Sydney Metro and the associated responses by the BDA.

Table 7 Sydney Metro Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Corridor Protection	<p>There are two rail corridors applicable to the site:</p> <ol style="list-style-type: none"> 1. The mapped future transport corridor which Section 4.9 of the State Environmental Planning Policy (Transport and Infrastructure SEPP) 2021 (T&I SEPP) refers to; and 2. The Sydney Metro – Western Sydney Airport project which has received Critical State Significant Infrastructure approval is defined as a “rail corridor” pursuant to provisions of the T&I SEPP. 	<p>Under the Western Parkland City SEPP, concurrence of TfNSW is required for:</p> <ul style="list-style-type: none"> • Development on transport corridor land with an estimated development cost of more than \$200,000, or • Development that involves the penetration of ground to a depth of at least 2 metres below ground level (existing) on land within 25 metres

Key Theme/ Issue	Comment/ Recommendation	Response
	<p>The Master Plan report on pages 50- 51 indicates tall buildings directly above or in close proximity to the Metro tunnels. As per comments provided to the proponent earlier, these tunnels have been designed for a maximum 2m excavation from existing ground level and a load capacity of 20kPa which will be consumed by bulk earthworks activities proposed by the Masterplan.</p> <p>Future developments above or in close proximity to the Metro substratum including basements, will be required to comply with Sydney Metro Corridor Protection Technical Guidelines and demonstrate nil adverse impact to Sydney Metro infrastructure.</p> <p>Future DAs will need to consider the relevant triggers and demonstrate acceptable impacts on existing and future rail infrastructure facilities. This should be included as a development standard for consideration.</p>	<p>(measured horizontally) of transport corridor land.</p> <p>Accordingly, no further development standards are needed.</p>
Activation with the Metro Precinct	<p>The Art and Cultural Strategy lists the Metro precinct as a location for public art and activation initiatives.</p>	<p>Noted.</p> <p>Further consultation with Sydney Metro is required to discuss the proposed timeline, delivery strategy, maintenance and integrate with Sydney Metro’s Art and Cultural Strategy.</p> <p>This consultation will occur separate to the Master Plan process.</p>
Noise and Vibration Impact	<p>Sydney Metro notes that the Noise and Vibration Impact Assessment does not provide prescriptive controls for noise and vibration mitigation to sensitive receivers such as residential users. It is recommended that noise impact mitigation measures for these sensitive uses are included as additional controls in Site Specific DCP.</p>	<p>Further development 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>
Connect with Country	<p>The Acknowledgement to Country in the Master Plan report and Aboriginal and Cultural Heritage Assessment Report reference the Darkinjung clan which is incorrect as this clan is from the North side of</p>	<p>The BDA’s area of operation spans across the eight councils that constitute the Western Parkland City: Blue</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	Hawkesbury River and does not belong to the Cumberland Plains. This should be amended.	<p>Mountains, Wollondilly, Penrith, Fairfield, Hawkesbury, Campbelltown, Camden, and Liverpool.</p> <p>All land within this area falls under the custodianship of the Dharug/Darug, Dharawal/Tharawal, Gundungurra/Gundungara, and Darkinjung peoples.</p> <p>References to the Darkinjung clan are appropriate and must be retained in all relevant reports and documentation.</p> <p>They are an integral part of the traditional clans that cover the Western Parkland City, and the BDA acknowledges their role as one of the traditional custodians of the lands in which we operate in.</p>

4.1.6 Transport for NSW

Table 8 below outlines a summary of the comments and issues raised by Transport for NSW (TfNSW) and the associated responses by the BDA.

Table 8 Transport for NSW Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Noise and Vibration Impact	TfNSW recommends that the following wording be added to Section 6 of the technical report <i>“Any development adjacent to the future transport corridors must comply with Development Near Rail Corridors and Busy Roads – Interim Guidelines. There may be greater attenuation required for sensitive or residential development”.</i>	Further development 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.

Key Theme/ Issue	Comment/ Recommendation	Response
Design Excellence Strategy	<p>TfNSW recommends that the following wording be added to the Design Excellence Strategy</p> <p><i>“Development within 25m of the SP2 zoned Infrastructure Corridor or within 25m of the Sydney Metro – Western Sydney Airport “rail corridor” must first consult with Transport for NSW and Sydney Metro and consider Rail Requirements”.</i></p>	<p>This is already a requirement of Clause 4.27 of the Western Parkland City SEPP, and this does not need to be reflected in the Master Plan.</p>
Master Plan	<p>Page 44</p> <ul style="list-style-type: none"> • Show SEPP Transport corridor as a land use. • Retitle Character Area map to “Land Use and Character Areas”. <p>Page 84 and 85</p> <ul style="list-style-type: none"> • Show pedestrian and cyclist crossings on Pedestrian and Cycling Network maps. 	<p>The Master Plan images shows the rail corridors as a special use zone.</p> <p>The land use and built form diagrams show potential for future over station development but notes that: <i>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 review by Government</i></p> <p>This map has been retitled as ‘Land Use and Character Areas’.</p> <p>TfNSW is currently developing an Access and Servicing Plan for Bradfield City Centre in consultation with Liverpool City Council and the BDA. This is reflected in the Master Plan document.</p> <p>This will detail intersection treatments, pedestrian/cyclist links traffic calming devices and pedestrian crossings.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
Road Cross Sections	<p>TfNSW recommends that the following disclaimer is provided on all road cross sections.</p> <p><i>“The overall form and road space allocation shown will be subject to detailed design. The intersection design and bus stops will be developed in consultation with TfNSW and are subject to future approvals. Tree Planting will not preclude the operation of double decker buses on bus-capable roads”.</i></p>	<p>The road cross sections have been through extensive consultation throughout the preparation of the TMAP and through the TAP assurance process.</p> <p>The Master Plan has increased road corridor widths compared to the Western Sydney Aerotropolis DCP.</p>

4.1.7 Sydney Water

Table 9 below outlines a summary of the comments and issues raised by Sydney Water and the associated responses by the BDA.

Table 9 Sydney Water Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Growth Data	BDA to provide a detailed annual breakdown of indicative dwelling numbers for the Bradfield City Centre Master Plan.	<p>An indicative annual breakdown of dwelling numbers has been provided to DPHIs Land use and Forecasting Team.</p> <p>The dwelling numbers provided have been incorporated in the latest approved NSW common planning assumptions data available to Sydney Water.</p>
Water and Wastewater Servicing	BDA and future developers are encouraged to continue early engagement directly with Sydney Water via cases raised through Water Servicing Coordinators. This early engagement will assist with the delivery of prudent and timely services.	Noted – This is an action for future DAs.
	As part of future development, the proponent will need to design and deliver multifunctional stormwater infrastructure including trunk	Noted – This is an action for future DAs.

Key Theme/ Issue	Comment/ Recommendation	Response
Stormwater – Future Development	drainage channels, bioretention systems, treatment wetlands and stormwater harvesting ponds to the satisfaction of Sydney Water.	
	The stormwater management system for the master plan must be designed such that future development will have the ability to meet NSW Government waterway health objectives through a combination of on-lot and on-street measures and connection to the Regional Stormwater Scheme.	Noted – This is an action for future DAs.
	Prior to the regional integrated stormwater scheme being operational the masterplan area will likely be required to implement interim stormwater servicing arrangements. These should be designed in consultation with Sydney Water.	Noted – This is an action for future DAs.

4.1.8 Department of Primary Industries

Table 10 below outlines a summary of the comments and issues raised by the Department of Primary Industries (DPI) and the associated responses by the BDA.

Table 10 Department of Primary Industries Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Additional recommendations	<p>DPI Fisheries are supportive of the recommendations in Table 17 of the Biodiversity Strategy and Impact Assessment and made additional recommendations to protect key fish habitat values at the site including:</p> <ul style="list-style-type: none"> • Implementation and protection of riparian buffer widths • A Rehabilitation Strategy should be developed to guide the establishment and rehabilitation of the riparian zone. • Consultation with DPI Fisheries during the design of transit corridors in the vicinity of fish habitats and consistency with DPI Fisheries Fish Passage Requirements for Waterway Crossings. • A dewatering management plan for dewatering of farm dams. • Ongoing maintenance of water sensitive urban design measures. • Staging of works to minimise erosion and sedimentation impacts and implementation of best practice erosion and sedimentation controls. 	<p>These recommendations will guide future DAs.</p> <p>Works relating to the Moore Gully re-alignment and stormwater infrastructure will be subject to a separate approval process.</p>

4.1.9 Department of Climate Change, Environment and Water – Biodiversity, Conservation and Science Group

Table 11 below outlines a summary of the comments and issues raised by the Department of Climate Change, Environment and Water – Biodiversity Conservation and Science Group (BCS) and the associated responses by the BDA.

Table 11 Department of Climate Change, Environment and Water – Biodiversity Conservation and Science Group Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Development footprint and assessment of biodiversity impacts	BCS supports intention to retain and enhance native vegetation within Ridge Park and the riparian zone associated with Moore Gully by excising it from the development footprint.	First Building works were the subject of a separate approval and therefore, are outside the scope of the Master Plan.
	It is noted, however, that the development footprint in the Biodiversity Strategy and Impact Assessment (BSIA) does not include stormwater/integrated management structures proposed in the Master Plan (Master Plan, p.35, p.144-5).	Future works for the design and development of Ridge Park will be subject to a separate approval process and are outside the scope of the Master Plan.
	In addition, BCS notes areas of ENV intended for protection have already been impacted by temporary access roads and will be further impacted by the provision of 'recreation infrastructure' such as pathways, barbeque areas and a swimming hole (Master Plan, p. 128-9, p.148-9). While the BSIA acknowledges 'minor impacts' to native vegetation will occur within proposed open space areas, BCS questions the assertions that this vegetation 'is being primarily retained or enhanced' and will 'retain much of their existing characteristics and functionality' (BSIA, p. 53).	
	BCS also questions whether the impacts on biodiversity values from clearing native vegetation and realigning Moore Gully to enable the proposed stormwater and other infrastructure has been adequately assessed. This include areas of 'minor encroachment into vegetated buffer' and 'offset of encroachment into vegetated buffer' which are noted in the	Impacts associated with the realignment of Moore Gully will be assessed under a separate approval process and are outside the scope of the Master Plan. The following paragraph has been inserted into the amended BSIA:

Key Theme/ Issue	Comment/ Recommendation	Response
	<p>Master Plan but not discussed in the BSIA or Master Plan (Master Plan, p. 144). It also includes potential impacts to large areas of Key Fish Habitat (KFH) which the BSIA recommends should be avoided noting that any impacts within the 50m KFH buffer would require liaison the Department of Primary Industries and the Natural Resources Access Regulator (BSIA, p.89).</p> <p>BCS recommends these matters be addressed in a revised biodiversity assessment prior to finalising the Master Plan.</p>	<p><i>"Impacts associated with the realignment of Moore Gully and any required stormwater infrastructure are being assessed as part of a separate approval and are not in scope for this BSIA."</i></p>
<p>Location and Status of Moore Gully</p>	<p>The location of Moore Gully differs between the Master Plan and BSIA.</p> <p>BCS concludes the BSIA has considered the current location of Moore Gully and not the realignment location proposed in the Master Plan.</p> <p>BCS also notes discrepancies between the BSIA and Master Plan in relation to the status of Moore Gully.</p> <p>The BSIA advises: 'Vegetation is supported along the length of Moore Gully due to the presence of shallow water and soil moisture held within the channel zone even within discontinuous sections. The waterway is interrupted by two large man-made dams, likely constructed around existing ponds. While the channel form is discontinuous in sections, the concept of a bed and bank (forming a channel or channel zone) is still applicable. The bed and banks of Moore Gully falls within the low point of the landscape and contains a wetted area that is evidenced by the presence of shallow surface water, aquatic and wetland vegetation. The centreline of this wetted area aligns well with the Hydroline mapping for the study area, with the</p>	<p>Biosis has included the existing publicly available Hydroline and HydroAreas in the mapping.</p> <p>These represent the approximate location of Moore Gully as it currently exists in the environment. Maps within the BSIA have been amended to show the proposed relocated Moore Gully as a dashed line.</p> <p>The realignment of Moore Gully will be assessed under a separate approval process and is not within the scope of this Master Plan.</p> <p>Wording in the Master Plan has been amended as follows:</p> <p><i>'Moore Gully, which has an unconfined, discontinuous channel with poorly defined bank, is proposed to be realigned slightly to the south to provide adequate space for stormwater basins (multi-use wetlands) and usable recreation areas'.</i></p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<p>Hydroline representing the centreline of the channel zone (Figure 6)' (BSIA, p.41).</p> <p>The Master Plan, however, advises, 'Moore Gully, which has no defined channel or bank is proposed to be realigned slightly to the south to provide adequate space for stormwater basins (multi-use wetlands) and usable recreation areas' (Master Plan, p. 120).</p> <p>BCS recommends the location and status of Moore Gully be clarified prior to finalising the Master Plan. A revised biodiversity assessment should be prepared to consider any proposed realignment of Moore Gully (in addition to any other changes proposed in a revised Master Plan).</p>	<p>Impacts associated with the realignment of Moore Gully will be assessed under a separate approval process and are not within the scope of this Master Plan.</p> <p>The following paragraph has been inserted into the amended BSIA:</p> <p><i>"Impacts associated with the realignment of Moore Gully and any required stormwater infrastructure are being assessed as part of a separate approval and are not in scope for this BSIA."</i></p>
<p>Potential presence of Elderslie Banksia Scrub Forest</p>	<p>The Greater Sydney Local Land Services (GSLLS) recently advised BCS of the potential presence of Elderslie Banksia Scrub Forest (EBSF) within the Master Plan area. EBSF is a listed as critically endangered under the BC Act and Environment Protection and Biodiversity Conservation Act 1999.</p> <p>BCS recommends that the area be surveyed to verify if the vegetation community is present. If EBSF is confirmed, measures should be taken to avoid and mitigate impacts in a revised BSIA.</p>	<p>On 18 April 2024, a field investigation to confirm the potential presence of Elderslie Banksia Scrub Forest within the Master Plan area was undertaken by expert consultants.</p> <p>The field investigation confirmed that Elderslie Banksia Scrub Forest is not present within the site.</p>
<p>Assessment of Marsdenia viridiflora subsp. viridiflora - endangered population</p>	<p>The BSIA is not clear on whether Marsdenia viridiflora subsp. viridiflora occurs within the Master Plan area and it is recommended that the presence of this endangered population be clarified in a revised BSIA report.</p>	<p>A field visit undertaken on 18 April 2024 confirmed that the Marsdenia viridiflora subsp. viridiflora population is still present with several individuals physically growing on the boundary fence.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<p>With regards to mitigating impacts for this species, the BSIA recommends 'individuals should be protected through No-Go zones' if future works in the area are required.</p> <p>BCS considers it should be a requirement that these individuals are protected in the long term. There should also be a requirement for their in-situ protection, and for the use of buffers to minimise potential indirect impacts. Expanding the ENZ in this area would assist to achieve this.</p> <p>Regarding the BSIA recommendation that options for the relocation of individuals be investigated, BCS advises that translocations are generally not appropriate for mitigating impacts from development as they are generally complex and historically have a high rate of failure.</p>	<p>Any impacts to the fence in this area (including fence removal) will impact the population. The BSIA has been updated to make this clearer.</p> <p>A recommendation has been included in Table 17 (Recommendation 9) that a No-Go Zone be established around this population.</p> <p>Alternatively, if the fence is to be removed, salvage and relocation of this population should be investigated.</p> <p>Given the growth habit of these individuals, this may be difficult to undertake. The future impacts associated with works in this area, and appropriate mitigations, will be subject to separate approval processes.</p> <p>Fencing has been installed on site to minimise the risk of access to the area with this species and to minimise the risk of harm to the endangered species.</p>
<p>Improving Master Plan biodiversity outcomes</p>	<p>BCS recommends that a reconfigured Master Plan that excludes stormwater and other infrastructure from the vegetated areas north and south of Moore Gully would achieve a better biodiversity outcome for the site.</p> <p>It is noted that patches of coastal freshwater lagoon (PCT 781) and coastal freshwater wetlands (PCT 1071) are present on site.</p> <p>BCS also recommends the proposed mixed land use area in the southwestern corner of the Master Plan area be reconsidered due to the likely indirect impacts from subsequent development on the directly adjoining areas of ENV proposed for retention.</p>	<p>The Master Plan including the stormwater basins are all included within the bio-certified area.</p> <p>The future location of stormwater infrastructure is in accordance with land identified as stormwater and drainage on the SEPP acquisition map.</p> <p>The Master Plan is not proposing any rezoning of land uses.</p> <p>Any future development will be subject to a separate application process and impact assessment.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
Flood Risk Assessment	<p>BCS has reviewed the Flood Impact Assessment (FIA) and has advised that it does not adequately address the flood planning Master Plan Requirements (MPR14) 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.</p> <p>BCS recommends that additional flood modelling be undertaken to consider the full range of flood risk to the site, including modelling up to the Probable Maximum Flood (PMF) level</p>	An addendum Flood Impact Risk Assessment (FIRA) has been prepared to include assessing the impact of the 1 in 500 year AEP event as well as the Probable Maximum Flood (PMF) for post development conditions
Stormwater Management and Waterway health	No functional design drawings for the water sensitive urban design (WSUD) systems appear to have been submitted with the Masterplan.	This is subject to detailed design and discussion with Sydney Water in relation to the stormwater requirements.
Waterway Corridors and Trunk Drainage	<p>BCS recommends the location of all existing streams within the Master Plan area be reviewed together with the existing catchment area for each stream. The review should then consider the streams shown in the Master Plan which may need to be amended to ensure:</p> <ul style="list-style-type: none"> • All streams required to be retained by the DCP are retained. • The location and size of waterway corridors and trunk drainage conceptually accords with the DCP requirements. 	<p>The Western Sydney Aerotropolis DCP allows the piping of Strahler Order 1 watercourses.</p> <p>The Master Plan is generally consistent with the Western Sydney Precinct Plan layout and stormwater catchment sizes are in accordance with the DCP.</p> <p>The IWCMP demonstrates catchment sizes of less than 15 ha across the Bradfield City Centre Master Plan area.</p>
Music Model	<p>It is recommended that further information, including diagrams, be provided to explain the use of flow diversions/secondary drainage links within the MUSIC model and other rationale for the modelling choices.</p> <p>In addition, the MUSIC model and strategy should be revised to ensure consistency with the Toolkit and Sydney Water Study.</p>	Music Model and Toolkit Excel files were provided to BCS on 19 February 2024.
Impact on Land outside the Master Plan Area	It is recommended that additional information be provided detailing how the system associated with Precincts 8 and 9 can be delivered in conjunction with the Master Plan, since it sits outside the Master Plan area.	Precincts 8 and 9 will drain into adjoining land which has been identified as land to be acquired for drainage purposes under the SEPP.

Key Theme/ Issue	Comment/ Recommendation	Response
	It is noted that as the system shown in Figure 11 of the IWCMP is in a different location to that envisioned by the Sydney Water Study – acceptance of this will be required from the affected landowner.	This is in accordance with Sydney Water Drainage Strategy for the area. The Integrated Water Cycle Management Plan has been amended to clarify in Appendix 6 .
Staging	It is recommended that a revised staging plan which includes the stormwater infrastructure required to support the delivery of stage 1 be prepared.	The Staging Plan has been amended to show the location of future stormwater infrastructure. The scope of works associated with the future stormwater infrastructure will be assessed under a separate approval process and is not within the scope of this Master Plan.
Strategy Concept Designs	No preliminary civil engineering plans or functional design drawings are provided for the stormwater systems.	This will be subject to future detailed design and is beyond the Master Plan scope.
Precinct Plan Amendments	Several the figures in the Planning Report do not properly reflect the stormwater treatment systems proposed in the IWCMP for the North-West and South of the site. BCS recommends the relevant figures in be revised to ensure consistency with the proposed stormwater infrastructure shown in Figure 11 of the IWCMP.	The stormwater treatment system proposed in the IWCMP for the north-west of the site is temporary and will drain into the trunk drainage network located on the adjoining site as shown in the Precinct Plan. The Integrated Water Cycle Management Plan (Appendix 6) has been amended to correct inconsistencies with the Planning Report. As discussed in Section 3.1 of this report, the exhibited Total Water Cycle Management and Blue – Green Infrastructure Framework plan within the Planning Report has been amended and shows the stormwater infrastructure proposed in the south reinstated to its original location as per the Precinct Plan.

4.1.10 Department of Climate Change, Environment and Water – Sustainability Team

Table 12 below outlines the comments and issues raised by the Department of Climate Change, Environment and Water – Sustainability Team and the associated responses by the BDA.

Table 12 Department of Climate Change, Environment and Water – Sustainability Team Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Opportunities to consider	<p>The submission acknowledged that the Sustainability Report submitted as part of the Master Plan is comprehensive and sets a level of ambition which positions government to lead by example.</p> <p>They have provided a list of additional sustainability opportunities for consideration:</p> <ul style="list-style-type: none"> • Alignment with UN Sustainable Development Goals (to showcase the world leading sustainability and benchmark the city globally). • It is likely the IPCC 1.5°C target will not be met (based on current trajectory and CoPs) so scenarios should be identified and considered in climate risk assessment. • Alignment with the Greenhouse Gas Protocol is needed to ensure requirements are embedded in asset lifecycle and operations of the city (to identify and address Scopes 1, 2 and 3 emissions in preparation for future reporting and disclosure). • Alignment with the Sustainable Cities and Regions 10-year strategy for urban systems transformation could be considered (refer to futureearth.org.au / Aus Academy of Sciences). • NatHERs and NABERS ratings should be considered if not already targeted (common for other cities in Australia). • Role of NSW and Australian Regional Climate Modelling (Narcis) to inform planning and design. • Using the Smart City Infrastructure for climate change risk management (early warnings of extreme heat, floods, bushfires and air quality issues). 	<p>Noted.</p> <p>Future developments will need to be consistent with the requirements of the Sustainable Buildings SEPP.</p> <p>Further, the Western Sydney Aerotropolis DCP includes sustainability requirements, including a requirement to demonstrate developments can achieve net zero by 2030.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<ul style="list-style-type: none"> • Adding objectives for Smart City's contribution to an integrated urban and regional knowledge platform (for data analysis and exchange, new capability and knowledge sharing). • Including Walk Score rating (to quantify and compare the city to others like Canberra who feature it in their city strategy). • Alignment with Global Liveability Ranking (to promote the city as an international exemplar and gateway to Australia). • A landmark building or site that showcases sustainability and draws visitors (as appropriate for an international gateway city). • An Asset Management Framework and Policy identified in the master planning suite to direct coordinated activity of the city in realising lifecycle value from its assets (aligned with the sustainability framework). 	

4.1.11 NSW Environmental Protection Authority

Table 13 below outlines the comments and issues raised by the NSW Environmental Protection Authority (EPA) and the associated responses by the BDA.

Table 13 NSW Environmental Protection Authority Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Contamination	EPA sets out that where remediation works are required, a Site Audit Statement and Site Validation Report to be prepared prior to the commencement of use.	Noted – This is an action for future DAs.
Land use conflict	<p>EPA noted that the presence of residential development may result in any future adjacent commercial and industrial development being limited in terms of scope or operation.</p> <p>In particular, it noted that mitigation of noise impacts on residential receivers would be a key consideration of future noise assessments for adjacent development.</p>	Noted – This is an action for future DAs.
Circular economy	<p>The Master Plan and associated documentation note that a specific waste precinct is needed. However, specific identification of land for waste infrastructure, and preserving and protecting existing infrastructure land against future development or rezoning, should be prioritised. Doing this would provide certainty to councils, industry and investors on the location they should consider building new waste infrastructure.</p> <p>The Circular Economy Waste Strategy developed by WSP is high level and defers back to final implementation during design in the DA for many of the waste outcomes. Practical examples and implementation /responsibility in delivery are encouraged for how waste and circular economy priorities will be achieved.</p> <p>The strategy could also more fully address some of the sustainability aims of the Master Plan. The detailing of quantity and type of waste</p>	<p>The Circular Economy Strategy investigates:</p> <ul style="list-style-type: none"> • Targets for waste generation reduction (operational and construction). • Solutions to avoid waste generation from the outset. • Dedicated food organics management solution. • Minimising the movements of waste collection vehicles. • Integration of community education through a circular economy hub. • Circular sharing initiatives. • Opportunities for last mile logistics and industrial symbiosis. <p>The long-term circular economy strategy for the Master Plan site will be refined and adapted as the site is developed over time.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	generated and how they will be managed, reused and recycled are still to be analysed.	The BDA will work with relevant stakeholders to identify land for circular economy infrastructure and seek to determine an appropriate location prior to the next Master Plan review in 5 years' time.

4.1.12 Heritage NSW

Table 14 below outlines the comments and issues raised by Heritage NSW and the associated responses by the BDA.

Table 14 Heritage NSW Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Future Development Requirements	<p>Any new development should consider the State Heritage Register (SHR) listed 'Kelvin' (SHR 00046).</p> <p>Consideration should be given to the height, bulk, scale and material of new buildings.</p> <p>It is recommended that future development includes a transitional area between the heritage item to ensure development is of a scale and character suitable to the heritage significance of Kelvin.</p>	<p>Chapter 2.2 of the Western Sydney Aerotropolis DCP sets out controls relating to heritage which will continue to apply to the subject site.</p> <p>This includes requirements to consider the impact of development adjacent to or within the vicinity of a heritage item.</p> <p>Future DAs will need to demonstrate compliance with the existing controls in the Western Sydney Aerotropolis DCP.</p>
Photographic Archival Recording	It is recommended that a Photographic Archival Recording be undertaken for the site prior to any changes being made to record the existing site.	Noted – This is a recommendation in all the Heritage Reports submitted as part of the Master Plan.
Heritage Interpretation Strategy	Heritage NSW notes that there is an opportunity to develop a Heritage Interpretation Strategy. A HIS will ensure significant heritage values of the site are appropriately interpreted and implemented.	The Aboriginal Cultural Heritage Assessment Report has recommended that a Heritage Interpretation Strategy be prepared for the study area in consultation with the relevant stakeholders.

Key Theme/ Issue	Comment/ Recommendation	Response
Unexpected Finds Procedure	In regard to the management of historical archaeological remains, an Unexpected Finds Procedure should be in place prior to the commencement of ground works.	Noted – recommendation in the Heritage Report that an Unexpected Find Procedure should be in place prior to the commencement of ground works. This will be a condition of future approvals.
Aboriginal Heritage Impact Permit	Heritage NSW agree with the ACHAR conclusions that an Aboriginal Heritage Impact Permit (AHIP) is required to authorise harm to the Aboriginal sites identified in the ACHAR.	Aboriginal Heritage Impact Permit 5244 that applies to the entire site was approved on 28 March 2024.

4.1.13 Water NSW

Table 15 below outlines the comments and issues raised by Water NSW and the associated response by the BDA.

Table 15 Water NSW Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Standard Development Requirements	For later development proposed on the site that is not State Significant Development (SSD), water supply works approvals may be required from WaterNSW such as for temporary dewatering purposes.	Noted – An action for future development.

4.1.14 NSW Rural Fire Service

Table 16 below outlines the comments and issues raised by NSW Rural Fire Service (RFS) and the associated responses by the BDA.

Table 16 NSW Rural Fire Service Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Standard Development Requirements	Future development(s) must comply with the requirements of relevant sections of Planning Bush Fire Protection (PBP) 2019.	Noted – Future applications will be required to comply with the requirements of the relevant sections of Planning Bush Fire Protection (PBP) 2019.
Open Space	Where open space(s) are considered as managed land for the purpose of hazard assessment, it must be supplemented by a suitable Vegetation Management Plan (VMP) or a Plan of Management (PoM) which guarantees commitment to future management demonstrating a regime is in place to ensure ongoing compliance with APZ requirements.	<p>As specified in the Bushfire Strategy and Impact Assessment Study, indicative Asset Protection Zones (APZs) are achievable within the developable area or within planned managed open space areas.</p> <p>The final location and dimension of APZs is to be confirmed once the hazard extent is finalised, pending detailed design of riparian corridors and vegetation retention and management plans.</p> <p>Future DAs will require a Bushfire Assessment in accordance with PBP. This will detail specific APZ requirements including ongoing management arrangements for APZs.</p> <p>Where APZs are located on public land any ongoing management would need to be agreed with the relevant agency.</p>
Special Fire Protection	It should also be noted that the proposal indicates development of certain Special Fire Protection Purpose (SFPP) development(s) which are	Special Fire Protection Purpose (SFPP) provisions will be applicable to future uses such as childcare centres,

Key Theme/ Issue	Comment/ Recommendation	Response
<p>Purpose (SFPP) development(s)</p>	<p>also required to meet the requirements of Appendix B of the addendum to PBP in addition to the requirements of Chapter 6 of PBP 2019.</p>	<p>tourist accommodation, education facilities, hospitals, seniors living, and any other development specified as SFPP under s.100B (6) of the Rural Fires Act or Section 46 of the Rural Fires Regulation.</p> <p>These developments would need to meet the criteria outlined in Section 6 of PBP including:</p> <ul style="list-style-type: none"> • Increased APZ setbacks (as per Table 8 in the Bushfire Strategy and Impact Assessment Study. • Provision of a Bush Fire Emergency Management and Evacuation Plan; and • Provision of suitable access and utilities according to Tables 6.8a-c of PBP. <p>These provisions, particularly the APZ requirements, will guide future consideration of suitable locations for these types of uses. The SFPP provisions of PBP will be addressed at the DA stage.</p>

4.1.15 NSW State Emergency Service

Table 17 below outlines the comments and issues raised by the NSW State Emergency Service (SES) and the associated responses by the BDA.

Table 17 NSW State Emergency Service Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Additional Flood Modelling	NSW SES recommends that additional flood modelling be undertaken to consider the full range of flood risk to the site, including modelling up to the Probable Maximum Flood (PMF) level, as well as considerations for climate change scenarios in respect to onsite flooding. It also recommends that consideration should be given to the impacts of flooding on future transport infrastructure up to and including the PMF.	An addendum Flood Risk Impact Assessment Report has been prepared to include assess the impact of the 1 in 500 year AEP event as well as the Probable Maximum Flood (PMF) for post development conditions. This addendum report indicates that there is no impact to major transport infrastructure.
Sensitive Uses	Sensitive uses, including schools, childcare facilities, Emergency Services and Medical Facilities are to be located above the PMF extent.	The majority of the developable area footprint is located above the PMF extent. The future location of sensitive uses will be subject to site due diligence and future DAs.
Future Users of development	Ensure users of the development, including workers during the construction phase and future residents are made aware of their flood risk, for example through site inductions, signage, and other flood information tools.	This is an operational requirement that will be addressed in a future development application.
Site Design and Stormwater Management	Pursuing site design and stormwater management that reduces the impact of flooding and minimises any risk to the community.	An addendum Flood Risk Impact Assessment Report has been prepared to include assess the impact of the 1 in 500 year AEP event as well as the Probable Maximum Flood (PMF) for post development conditions. The site design and stormwater management infrastructure are subject to detailed design and discussion with Sydney Water.
Future Provision NSW SES Facility	Including the provisions for a NSW SES facility within the Aerotropolis due to the proposed increase in population and associated increase in flood and storm risks, in consultation with NSW SES.	The BDA will continue to work with the SES to determine if Bradfield City Centre is an appropriate location for an SES facility.

4.1.16 Greater Sydney Parklands

Table 18 below outlines the comments and issues raised by Greater Sydney Parklands and the associated responses by the BDA.

Table 18 Greater Sydney Parklands Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Design Excellence of Parklands	GSP supports a design excellence process for future open space areas and notes that an important part of design excellence is ensuring that the park meets community requirements.	Noted.
Funding for open space and infrastructure delivery	GSP notes that sustainable funding for ongoing operational, maintenance and asset renewal requirements needs to be considered to ensure any future manager or landowner of the open space can ensure the continued high quality of the parklands.	Sustainable funding for the ongoing operation, maintenance and asset renewal of open space will be determined once the infrastructure is delivered.
Major Events Space	The Master Plan should consider the impact of lighting, noise and access into the regional park associated with the events space on the adjacent uses and built form.	Impacts associated with a major event space will be subject to a separate development application.
Amendments to Land Reservation Acquisition Map	<p>The proposed regional park boundaries on the Land Reservation Acquisition Map are not clear in the south-east corner of the site.</p> <p>As currently proposed, it appears the regional park boundary results in small areas northwest of Thompsons Creek that could be inefficient to manage for the future landowner or manager.</p> <p>Furthermore, it is proposed to remove open space for the purposes of a north south road which will split the local open space. Connected areas of open space provide a better outcome for the community and the future manager. Other options should be explored to ensure larger more contiguous areas of open space are delivered.</p>	<p>The Master Plan is not proposing to modify the regional park boundaries on the Western Parkland City SEPP - Land Reservation Acquisition Map.</p> <p>The north south road is identified as a Collector Road on the Street Hierarchy Plan in the Precinct Plan.</p> <p>No change is proposed to this road as part of the Master Plan.</p>

4.1.17 The Parks NSW

Table 19 below outlines the comments and issues raised by The Parks NSW (an alliance of the eight local governments that have partnered on the Western Sydney City Deal) and the associated responses by the BDA.

Table 19 The Parks NSW Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Vision, objectives, and relationship to the Western Parkland City	<p>It is recommended 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.</p> <p>A new or revised objective should be included to recognise the role of the City Centre in transformational employment generation, in particular in providing knowledge intensive employment opportunities for existing communities as well as for future growth.</p>	<p>Linkages to the wider Western Sydney Aerotropolis are detailed in the Western Sydney Aerotropolis Precinct Plan.</p>
Economic strategy and impact	<ul style="list-style-type: none"> It is recommended that 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. It is also recommended that the evidence base relied on for the growth and staging of the City Centre be reviewed to ensure The Parks' Councils' feedback on the PIC has been considered and be updated to include current assumptions regarding forecast growth, to be used to prepare a realistic staging plan that reflects that the timing for meeting the employment targeted will not be achieved by 2056 (as per the studies supporting the draft Master Plan). This realistic staging will be important to inform infrastructure investment coordination and optimisation. It is recommended that retail gravity modelling be undertaken to understand the economic impact of the proposed City Centre on 	<p>Noted.</p> <p>The divestment strategy of future superlots will consider the suitable land use mix to protect jobs capacity and supply of appropriately retail services.</p> <p>The growth and staging of the City Centre will be reviewed with each 5-yearly Master Plan review, utilising latest assumptions at the time.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	other metropolitan and strategic centres in the Western Parkland City.	
Transport infrastructure and connectivity	<p>A 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.</p> <p>It is recommended that the draft Master Plan approval links addressing off-site connectivity issues to development of the site over the long term and expand its attention to external impact from such a major new City Centre development.</p>	Linkages to the wider Western Sydney Aerotropolis are detailed in the Western Sydney Aerotropolis Precinct Plan and related SEPP.
Infrastructure delivery	It is recommended that ongoing discussions are held with key Government Agencies to ensure key infrastructure is provided within the site.	<p>Noted - The BDA has already commenced discussions with key Government Agencies to ensure key infrastructure is provided within the site in line with demand.</p> <p>BDA is currently preparing a Planning Agreement which will identify all infrastructure to be delivered as part of Phase 1 of the Master Plan delivery program.</p>
Solar Access	It is recommended that 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>A performance-based envelope model based on the solar access requirements for public open space was developed throughout the Master Plan process.</p> <p>Building envelopes and building heights have been designed with the intent to achieve amenity outcomes including solar access and cross ventilation and to maximise solar amenity through the siting and design of built form to protect communal and public open space.</p> <p>The Master Plan includes development controls to ensure an appropriate level of solar access is maintained to open spaces.</p>
Affordable Housing	It is recommended that clear provisions are written into the Master Plan development controls setting out the 30% requirements for affordable housing.	The Master Plan has been updated to require that affordable housing is provided in accordance with current Government policy.

4.1.18 Endeavour Energy

Table 20 below outlines the comments and issues raised by Endeavour Energy and the associated response by the BDA.

Table 20 Endeavour Energy Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Standard conditions and guidelines	Endeavour Energy provided a series of standard conditions and guidelines for future development in Bradfield City Centre and noted that it is important that the proponent / applicants continue to engage / liaise with Endeavour Energy to ensure a suitable electricity supply is available as the projects progress.	Noted – An action for future DAs.

4.1.19 Department of Education

Table 21 below outlines a summary of the comments and issues raised by the Department of Education and the associated responses by the BDA.

Table 21 Department of Education Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Service Need Demand	<p>The proposed growth within the site and wider area will result in a requirement for one additional local primary school (up to 1000 students' capacity) and one future high school (between 1000-1500 students).</p> <p>Delivery of this infrastructure will be subject to additional consultation between DoE, DPHI and BDA. The future secondary school site will accommodate demand generated by the Bradfield City Centre and surrounding areas.</p>	<p>Noted – The timing and delivery of future school infrastructure will be subject to additional consultation between DoE, DPHI and BDA.</p>
Indicative School Locations	<p>The Department of Education (DoE) requests that all mapping which identifies locations for future school sites within BCC be amended to state “investigation areas for potential future school sites” to manage community expectations.</p>	<p>The Master Plan does not identify or nominate school sites. This will be the subject of future consultation with the DoE. The Master Plan notes that:</p> <p><i>The Bradfield City Centre will be supported by appropriately sited education facilities including the provision of a new public school and a new high school in accordance with School Infrastructure NSW's 'School Site Selection and Development Guidelines' (which outline the site-based requirements for any new school site) and ongoing consultation with SINSW.</i></p> <p><i>The locations and timing of educational facilities are under investigation and subject to further review by School Infrastructure NSW.</i></p>
Potential Future School Locations	<p>The DoE and the BDA have commenced investigations into a potential future school site location. Whilst it is preferred that future schools be accommodated on stand-alone sites, the future built form of BCC and the wider Aerotropolis Core Precinct is high density, and flexibility must</p>	<p>The BDA will continue to work with Schools Infrastructure NSW to determine and finalise an appropriate location for a future primary and high school prior to the next Master Plan review in 5 years' time.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
	<p>be assured in the case that a school is to be delivered via the alternative model (e.g., floor space within a mixed-use development).</p> <p>As noted previously, any future school sites within the BCC would need to align with the requirements of the DoE School Site Selection Guidelines (2023).</p>	
Social Infrastructure Strategy	DoE requested amendments to Table 8 - NSW State Government Planning Documents of the Social Infrastructure Strategy Report.	<p>The Social Infrastructure Strategy has been reviewed and updated to remove references to Planning New Schools/Safety Guidelines as requested by DoE.</p> <p>Refer to Appendix 5 for the amended Social Infrastructure Strategy Report.</p>
Environmental Assessment	<p>Schools should be considered as a sensitive receptor for the purposes of these assessments, particularly the study of traffic, flooding, access, noise and vibration and air quality impacts within the BCC.</p> <p>Schools are also required to be located outside the ANEF 20 contour and be able to meet the relevant APZ requirements of Planning for Bushfire Protection.</p>	The BDA will continue to work with Schools Infrastructure NSW to determine and finalise an appropriate location for a future primary and high school taking into consideration these matters.
Additional Flood Modelling	DoE have indicated that future school sites must site above the Probable Maximum Flood Level and have requested that the Flood Impact Assessment Report be amended to consider the full range of flood scenarios for the Precinct, including the Probable Maximum Flood Event (PMF).	<p>An addendum Flood Risk Impact Assessment Report has been prepared to include assess the impact of the 1 in 500 year AEP event as well as the Probable Maximum Flood (PMF) for post development conditions.</p> <p>The BDA will continue to work with Schools Infrastructure NSW to determine and finalise an appropriate location for a future primary and high school that is outside of the PMF.</p>

4.2 Response to Organisation and Interest Groups

The following section provides response to ten (10) submissions received from organisations and interest groups during or closely after closure of exhibition. There was one objection to the projection and the remaining submission highlighted comments.

4.2.1 Urban Development Institute of Australia

Table 22 below outlines the comments and issues raised by the Urban Development Institute of Australia (UDIA) and the associated responses by the BDA.

Table 22 Urban Development Institute of Australia Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Increase Planning Controls	Strongly encourages the Department of Planning and BDA to review Heights of Buildings and FSRS to insure there is opportunity for greater height and density within the Bradfield City Centre and wider precinct.	Height and FSR controls for Bradfield City Centre were set by DPHI through the Western Sydney Aerotropolis Precinct Plan, and changes are beyond the scope of the Master Plan. The BDA and DPHI will monitor the take up of development in the Master Plan area and may consider in investigating increases in height and density in future.
Transport Connectivity	Adequate provision is made for the build and completion of the Southwest Rail Link Extension by 2031 and the full North-South Rail link by 2035.	Construction is progressing for Stage 1 of Sydney Metro - Western Sydney Airport to the Western Sydney Aerotropolis. The transport infrastructure corridor zoned SP2 will be retained and preserved for future transport links to the south and southeast, enabling future project delivery.
Staging and sequencing	UDIA recommends the Master Plan provide greater clarity regarding the delivery and construction phase and recommends BDA provide a clearer scope of the development sequencing and timing.	The development sequencing and timing of Master Plan delivery will be subject to more detailed consideration and ongoing review of the market conditions.

Key Theme/ Issue	Comment/ Recommendation	Response
Contributions, Fees and Charges	UDIA strongly encourages the BDA to focus funds towards local road and transport infrastructure.	The BDA will be responsible for providing local and state infrastructure within Stage 1 of the Bradfield City Centre, to support growth. BDA is currently preparing a Planning Agreement which will identify infrastructure to be delivered as part of Phase 1 of the Master Plan delivery program.
Design Excellence Requirements	UDIA urges the BDA to carefully consider the thresholds, locations and identified structures requiring design competitions and that all reasonable steps are taken to mitigate extensive and costly design processes.	As part of the Master Plan a Design Excellence Strategy has been prepared. It sets out an approach to achieving design excellence which amends the thresholds under the Western Parkland City SEPP and rationalises the number of design competitions required.

4.2.2 Urban Taskforce

Table 23 below outlines the comments and issues raised by Urban Taskforce and the associated responses by the BDA.

Table 23 Urban Task Force Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Increase Planning Controls	Recommended that BDA review the Heights of Building and FSRs to ensure there is opportunity for greater height and density within the Bradfield City Centre, with the airport limitations being the only restriction.	Height and FSR controls for Bradfield City Centre were set by DPHI through the Western Sydney Aerotropolis Precinct Plan, and changes are beyond the scope of the Master Plan. The BDA and DPHI will monitor the take up of development in the Master Plan area and may consider in investigating increases in height and density in future.
Infrastructure Delivery	That DPHI/BDA review critical elements of the Master Plan in terms of infrastructure delivery and timing and a separate 5-year document be	Noted – this is a matter for DPHI to progress.

Key Theme/ Issue	Comment/ Recommendation	Response
	prepared by DPHI for the precinct and surrounding lands as a matter of urgency.	
Infrastructure contributions	<ul style="list-style-type: none"> • That the Government confirm the Section 7.12 local infrastructure contributions applicable to Bradfield City. The levy should take into account the high burden of SICs proposed for Bradfield City. • That government update the Master Plan to include an estimate of all revenue to be raised by each of the sources for local and State infrastructure to assist industry complete feasibility analyses for their involvement in delivering the vision detailed in this Bradfield City Master Plan • That DPHI/BDA update the Master Plan to include an estimated cost of the Works in Kind/Infrastructure Contributions Plan with Liverpool City Council. 	<p>Noted – the finalisation of the local infrastructure contributions plan is for DPHI to progress.</p> <p>The BDA will assess its contributions liabilities and credits and undertake feasibility analysis as part of its Phase 1 Master Plan delivery program.</p>
Infrastructure Sequencing	Establish closer working relationships with industry partners to prioritise infrastructure outside Bradfield critical to maximising jobs and housing opportunities needed to service and benefit from the opening of the new airport.	Noted – the BDA supports working with industry partners across the Aerotropolis to leverage the benefits of the new airport.
Public Art	Recommend that prescriptive elements be removed from Public Art Strategy, such as involving artists in planning.	The Arts and Culture Strategy builds on the provisions of the Western Sydney Aerotropolis DCP.

4.2.3 Committee for Sydney

Table 24 below outlines the comments and issues raised by the Committee for Sydney and the associated responses by the BDA.

Table 24 Committee for Sydney Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Affordable Housing	The Committee for Sydney recommends including in the Master Plan and Planning report a specific commitment regarding the delivery of a minimum of 30% affordable, social, and universal housing in the Bradfield City centre.	The Master Plan has been amended to require affordable housing to be delivered in accordance with current Government policy.
Evolutionary nature of City Centre development and reserve highest and best land use	The Committee for Sydney recommends a horizons-based approach to the sequencing of land parcel development and land use to retain long term adaptability, with a focus on commercial and industrial in earlier stages and residential as a longer-term land use.	Noted – this is consistent with BDA’s approach of prioritising advanced manufacturing and related sectors within a mixed use centre in Stage 1 Master Plan delivery.
Role of other Western Sydney centres and precincts	The Master Plan is silent on the role that Bradfield plays in a broader network of Strategic and Metropolitan Centres across Western Sydney	<p>The intended uses for the City Centre include a mixture of commercial, research and development, community, retail and education land uses.</p> <p>This diversity of employment in the City Centre supports the objectives of the Western Sydney Aerotropolis Plan for the Aerotropolis Core as a key employment centre in Western Sydney, aligned with the Western City District Plan and Precinct Plan.</p> <p>Whilst the City Centre is likely to attract businesses associated with the established industries in the Western Sydney Aerotropolis – particularly related to advanced manufacturing, Liverpool and Penrith are still considered to be major regional centres for retail, community and civic functions and are likely to retain these advantages over Bradfield City Centre for the foreseeable future.</p>

Key Theme/ Issue	Comment/ Recommendation	Response
Infrastructure funding strategy	It is recommended that BDA ensure that there is sufficient funding allocated through infrastructure contributions for the sustainable ongoing operations of proposed social and cultural infrastructure.	Noted – contributions fund capital works only with operational funds required from other local and state sources.

4.2.4 Green Building Council of Australia

Table 25 below outlines the comments and issues raised by the Green Building Council of Australia (GBCA) and the associated responses by the BDA.

Table 25 Green Building Council of Australia Comments

Key Theme/ Issue	Comment/ Recommendation	Response
General Comments	GBCA commends the commitment to create a city of healthy, resilient, and sustainable buildings and the use of the Green Star rating and certification system as an assessment tool for demonstrating compliance against the objectives and standards established in the Master Plan.	Noted.

4.2.5 Community Housing Industry Association

Table 26 below outlines the comments and issues raised by the Community Housing Industry Association (CHIA) and the associated responses by the BDA.

Table 26 Community Housing Industry Association Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Affordable Housing	<p>CHIA NSW is supportive of the vision to create a thriving mixed-use precinct at Bradfield City Centre. However, it is disappointed that the draft master plan does not include any provisions to secure social and affordable homes.</p> <p>It is recommended that the Master Plan includes a minimum 5% affordable housing requirement for future residential, mixed-use and employment generating development.</p>	The Master Plan has been amended to require affordable housing to be delivered in accordance with current Government policy.

4.2.6 Shelter NSW

Table 27 below outlines the comments and issues raised by Shelter NSW and the associated response by the BDA.

Table 27 Shelter NSW Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Affordable Housing	<p>The Bradfield City Centre Master Plan as exhibited is incapable of creating a regulatory framework and any pre-requisite conditions to embed delivery of social and affordable housing within the Bradfield City Centre.</p> <p>The exhibited Master Plan is fundamentally flawed without a coherent statutory planning framework to realise a vision to compel government to act to address social and affordable housing needs and cannot be viewed as promoting the public interest.</p>	The Master Plan has been amended to require affordable housing to be delivered in accordance with current Government policy.

Key Theme/ Issue	Comment/ Recommendation	Response
	Shelter advocates for a recommendation for refusal of the exhibited Master Plan in direct response to the lack of evidence to make explicit provisions to provide for, maintain and regulate matters relating to social and affordable housing.	

4.2.7 Western Sydney University

Table 28 below outlines the comments and issues raised by Western Sydney University and the associated response by the BDA.

Table 28 Western Sydney University Comments

Key Theme/ Issue	Comment/ Recommendation	Response
General Comment	WSU is seeking to establish a presence within the Bradfield City Centre, specifically a primary tenancy within the Advanced Manufacturing Research Facility (AMRF). Collaboration between universities, industry, and research through the AMRF, AIH and other initiatives will greatly benefit from strong employment targets, and the subsequent benefits which this provides.	Noted.

4.2.8 Centre for Western Sydney University

Table 29 below outlines the comments and issues raised by Centre for Western Sydney University and the associated responses by the BDA.

Table 29 Centre for Western Sydney University Comments

Key Theme/ Issue	Comment/ Recommendation	Response
General Comment	The Centre for Western Sydney University are supportive of the Bradfield City Centre Masterplan and provide 11 recommendations for consideration by the BDA as detailed below.	Noted.
	Actively attract investment and new industries to strategically co-locate near universities, research institutions, and start-up incubators at Bradfield to commercialise and scale up new ideas.	Noted – this is consistent with BDA’s approach of prioritising advanced manufacturing and related sectors in Stage 1 Master Plan delivery.
	Continue to focus on establishing Bradfield as Australia’s leading centre of advanced manufacturing excellence.	Noted.
	Promote Bradfield as the international tourism gateway to destination Western Sydney.	Noted – the Master Plan provides for tourism uses in a high quality built and natural environment.
	Adopt the planned education partnership model between universities, TAFE, and industry across the nation to provide greater access to new in-demand skills and lifelong learning.	Noted – this is intended to be supported through Stage 1 Master Plan delivery.
	Continue engagement with Indigenous residents and stakeholders in a meaningful way, both during the development and delivery of Bradfield.	Noted – ongoing engagement with Indigenous stakeholders has been a key focus and will continue through Stage 1 Master Plan delivery
	Constantly assess future population growth models in Bradfield to avoid catch-up services and vital infrastructure.	Noted – BDA, DPHI and Liverpool City Council will monitor the take up of development in the Master Plan area to inform service and infrastructure delivery.
	Health, education, and innovation precincts such as those proposed for Bradfield and near the Aerotropolis must incorporate affordable housing development for key workers to ensure the retention of frontline and essential workers such as nurses, police, and teachers.	The Master Plan has been amended to require affordable housing to be provided in accordance with current Government policy.
	Encourage other jurisdictions to adopt best practice liveability initiatives planned for Bradfield so all Australians have high-quality amenities and quality of life.	Noted.

Key Theme/ Issue	Comment/ Recommendation	Response
	Move from Rapid Buses to rail routes as quickly as practicable to join up growth centres in Western Sydney with Bradfield, the Western Sydney International Airport, and the Aerotropolis.	Noted.
	Encourage other jurisdictions to look to Bradfield's initiatives on net zero energy and water systems to adopt them in new developments.	Noted.
	Adopt the State of the Arts recommendation for a commitment to minimum per-capita funding for arts and culture based on population distribution across three tiers of government and undertake a feasibility study for developing cultural precincts and creative industry clusters in Bradfield.	Noted – the Master Plan provisions for a future Civic/Cultural use opposite Central Park for delivery once funding is made available.

4.2.9 Action for Public Transport NSW

Table 30 below outlines the comments and issues raised by Action for Public Transport and the associated response by the BDA.

Table 30 Action for Public Transport Comments

Key Theme/ Issue	Comment/ Recommendation	Response
Transport Connections	Advocacy for district level transport infrastructure including significant public transport investment and both state and regional road network expansion to connect the City Centre with the surrounding area.	<p>Construction is progressing for Stage 1 of Sydney Metro - Western Sydney Airport to the Western Sydney Aerotropolis.</p> <p>The transport infrastructure corridor zoned SP2 will be retained and preserved for future transport links to the south and southeast, enabling future project delivery.</p>

4.3 Response to Public Submissions

Table 31 below outlines the comments and issues raised by the general public and the associated responses by the BDA.

Table 31 General Public Submissions

Key Theme/ Issue	Comment/ Recommendation	Response
<p>40 The Retreat, Bradfield</p>	<p>A submission was received from an adjoining neighbour 40 The Retreat, Bringelly located to the east of the site.</p> <p>It raised concerns about the proposed realignment of a collector road and indicative local streets in the Aerotropolis Precinct Plan, along with the staging, timing, and delivery of transport infrastructure.</p> <p>The submission recommended that:</p> <ul style="list-style-type: none"> • A proposed amendment to the Street Hierarchy Map (Figure 10) of the Aerotropolis Precinct Plan is reconsidered and that a road alignment that would have fewer impacts on adjacent landowners is adopted. An alternative and preferred concept scheme with an adjusted road alignment is presented and discussed the submission. • That the Masterplan Staging Plan is amended to deliver the necessary roads and infrastructure to support the development of adjacent land in the “First Priority Area” under the Aerotropolis Precinct Plan. This will deliver new housing stock sooner, which is a significant positive for the State given current shortages. • We recommend that the proposed road realignment is reconsidered in terms of its impacts on adjacent landowners, rather than being considered in isolation for the masterplan area. • That the proposed staging for the delivery of housing, as well as the housing targets for the Bradfield City Centre, are reconsidered 	<p>The minor design amendments suggested to the indicative local streets have been accommodated in the final Master Plan.</p> <p>The eastern edge of Bradfield City Centre is intended to be delivered in later stages, as it beyond the Stage 1 Master Plan delivery.</p> <p>Landowner coordination across adjoining boundaries to construct local roads is undertaken on a voluntary basis in the Aerotropolis.</p> <p>The proponent will need to access their site via the existing road (The Retreat) if they wish to develop prior to adjoining landowners.</p>

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	to better address the current housing shortages within the Western Parkland City.	
North Bringelly Interface	<p>A submission was received from an adjoining neighbour located to the north of the site.</p> <p>The submission raised concerns about the interface between North Bringelly and Bradfield City Centre. Specifically, how the City Centre integrates with the surrounding landholdings, both in terms of movement, connections and built form outcomes.</p> <p>The submission raised concerns about changes to the Precinct Plan which previously identified an east west road between the Bradfield City Centre site and the North Bringelly site.</p> <p>The submission noted that without the separating road (which is owned by a third party), this diminishes the ability to appropriately manage the development of irregular shaped blocks. Rather, it creates a situation where the development outcome across the three sites is reliant on a shared development outcome and creates issues with the timing of the delivery of development across the three sites, as well as the potential for the built form outcomes to conflict and create an undesirable urban outcome.</p> <p>The submission noted that further design consideration is required to ensure the interface between the City Centre and the surrounding landholdings is appropriately thought out and addressed.</p>	<p>Three sites to the north are reliant on a shared development outcome.</p> <p>The draft Master Plan has been amended to re-instate the local road along the northern boundary of Bradfield City Centre, consistent with the Western Sydney Aerotropolis Precinct Plan.</p> <p>Indicative built form modelling has been amended accordingly for a suitable interface.</p>
Freedom and Privacy Concerns	15 submissions were campaign-style objections, raising concerns about freedoms and privacy associated with smart city technologies and 15/30-minute neighbourhoods.	<p>Freedom and privacy concerns raised by the community are noted.</p> <p>BDA has modified language in the Master Plan to recognise this issue and will consider in future DAs.</p>

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Sustainability and innovation	The Master Plan should aim for more innovative approach to sustainability including passive solar designed buildings, responsiveness to country and to the environment, provide for enhanced building orientation and solar access and rainwater reuse.	Future development will need to be consistent with the requirements of the Sustainable Buildings SEPP. Further, the Western Sydney Aerotropolis DCP includes sustainability requirements including a requirement to demonstrate developments can achieve net zero by 2030.
Built form	The height limitation was questioned, and it was recommended that the height should be limited only by the OLS of 125m.	Height and FSR controls for Bradfield City Centre were set by DPHI through the Western Sydney Aerotropolis Precinct Plan, and changes are beyond the scope of the Master Plan.
Luddenham Village Plan	4 submissions were received regarding progression of the Luddenham Village Plan.	Noted – this is a matter for DPHI.
Affordable Housing	No affordable or social housing provided.	The Master Plan has been amended to require affordable housing to be provided in accordance with current Government policy.
Amendments to Special Infrastructure Zone	One objection was received from an adjoining neighbour at 75 Badgerys Creek Road. The objected to the BDA amending the Aerotropolis Precinct Plan in the Master Plan to change land from ‘Special Infrastructure’ and ‘Education’ use to ‘Commercial Centre - Mixed Use’. The landowner has also previously sought to have the ‘Special Infrastructure’ designation removed from their site but has been unsuccessful.	The adjoining site has been identified as a future location for ‘Special Infrastructure’ for social infrastructure purposes in Liverpool City Council’s Draft 7.12 Contribution Plan. While the BDA proposes to remove the spatial location of sites identified as ‘Special Infrastructure’ and ‘Education’ in the Western Sydney Aerotropolis Precinct Plan from the draft Master Plan, the draft Master Plan commits to providing social infrastructure and a future primary and high school, with locations to be determined. The Master Plan’s Response to Country Report prepared in consultation with Traditional Custodians identified the area shown in the Precinct Plan as ‘Special Infrastructure’ as a potential future First Nations Cultural Space.

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		<p>The area shown in the Western Sydney Aerotropolis Precinct Plan as 'Education' is in a future stormwater catchment area for development within the draft Master Plan, and not considered appropriate for a school site.</p> <p>The future location of the school site/s will be subject to due diligence and consultation with Schools Infrastructure NSW as service needs are better understood.</p> <p>The BDA will continue to work with Schools Infrastructure NSW to determine and finalise an appropriate location for a future primary and high school prior to the next Master Plan review in 5 years' time.</p>
Stormwater Impacts	Submission raised concerns about the downstream impacts/ pollution from increased water runoff into adjoining lots as a result of future development.	<p>All catchments within the Bradfield City Centre will be draining into the Regional Stormwater Basins (managed by Sydney Water) for treatment and detention prior to discharging into Moore Gully and Thompsons Creek.</p> <p>As a result, the quantity and quality of the stormwater discharging into the waterways will be managed in order to meet the relevant Western Sydney Aerotropolis DCP requirements for waterway health.</p>
Mapping	The Map on page 7 is incorrect. Elizabeth Drive does not cut through Western Sydney International Airport (WSA). The two maps on the previous page (page 6) are correct. It is disappointing that this Master Plan Map is wrong, as it should have shown the proposed Bradfield City Centre in the context of WSA nearby. Elizabeth Drive does not curve around and bisect WSA, as this shows. Elizabeth Drive should be shown on the northern boundary of WSA.	The Context Map on Page 7 of the Master Plan has been amended and shows Pitt Street in the correct location. Elizabeth Drive is no longer shown on the map as it is outside the area.

5 Conclusion

This Response to Submissions Report outlines changes made since exhibition of the Master Plan along with additional environmental assessment undertaken.

It has also sought to address all issues raised in submissions received during exhibition.

The Report is supported in **Appendices 1-6** by:

- An updated Master Plan document.
- Updated Biodiversity Strategy and Impact to consider presence of Elderslie Banksia Scrub Forest and assessment of *Marsdenia viridiflora* subsp. *viridiflora* endangered population.
- An addendum Flood Impact Risk Assessment report following modelling of the probable maximum flood (PMF) and 1 in 500-year AEP flood levels and completion of a flood risk assessment.
- Amended Arts and Culture Strategy to address comments raised by Liverpool City Council.
- Amended Social Infrastructure Strategy Report to address comments raised by Department of Education.
- Amended Integrated Water Cycle Management Plan address comments raised by DCCEEW.

It is considered that all issues raised in submission have been satisfactorily addressed and that the Master Plan can now be finalised.

Appendix 1 – Updated Master Plan

Appendix 2 – Updated Biodiversity Strategy and Impact Assessment

Appendix 3 – Addendum Flood Impact Risk Assessment

Appendix 4 – Amended Arts and Cultural Strategy

Appendix 5 – Amended Social Infrastructure Strategy Report

Appendix 6 – Amended Integrated Water Cycle Management Plan

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