

# IPG Badgerys Creek Road Master Plan

Western Sydney Aerotropolis Master Plan Assessment Report (WSA\_MP01)

June 2025





# Acknowledgement of Country

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# Preface

This assessment report provides a record of the Department of Planning, Housing and Infrastructure's (the Department) assessment and evaluation of the Western Sydney Aerotropolis master plan application for the IPG Badgerys Creek Road site lodged by the Ingham Property Group (IPG) (the proponent). The report includes:

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

# Executive Summary

This report details the Department's assessment of the Western Sydney Aerotropolis master plan application for the draft IPG Badgerys Creek Road Master Plan (the master plan).

This report is provided to the Minister for Planning and Public Spaces (the Minister) for consideration when deciding whether to grant approval to the master plan.

## Master plan

Ingham Property Group (IPG) – the proponent - lodged a master plan application on 1 October 2024 seeking approval to establish a planning control framework for development of an enterprise estate, comprising employment uses, such as warehouse and distribution centres, light industry, and a small-scale local centre including commercial uses, as well as the provision of open space and riparian corridors.

The master plan site is located at 475 Badgerys Creek Road, Bradfield.

The master plan has an estimated development cost (EDC) of \$524 million and is expected to generate up to 12,429 jobs. The development of the site enabled by the master plan is projected to have the capability to deliver approximately 625,467m<sup>2</sup> of employment GFA.

The 184-ha master plan site has a relatively level topography and is bounded by two riparian corridors to the west and east and divided by a third riparian corridor traversing through the centre of the site. It is predominately zoned for enterprise use with some small areas zoned for environment and recreation use under the State Environmental Planning Policy (Precincts— Western Parkland City) 2021 (Western Parkland City SEPP).

The site is bisected by, and adjacent to, arterial and sub-arterial transport corridors including Badgerys Creek Road and the future proposed Eastern Ring Road, Bradfield Metro Link Road and Fifteenth Avenue. These characteristics will enable large footprint jobs-intensive buildings such as warehousing and distribution centres that can capitalise on the site's proximity to the Western Sydney International Airport and the Bradfield and Liverpool city centres.

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

The proponent has requested a number of supporting amendments to the statutory planning framework to reflect the master plan design. Proposed alongside the master plan are amendments to the land reservation acquisition, land zoning and transport corridors maps in the Western Parkland City SEPP, as well as insertion of site-specific exempt development provisions. Various



figures within the Western Sydney Aerotropolis Precinct Plan (precinct plan) are also proposed to be amended to reflect the master plan design. Additionally, variations are proposed to the Western Sydney Aerotropolis Development Control Plan (DCP) controls to guide future development on the site. As such, a minor, consequential amendment to the DCP will be required to advise that the master plan contains site-specific development controls for the site, in addition to the DCP.

## Technical Assurance Panel

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

## Strategic context

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

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

## Statutory context

The master plan is enabled by Chapter 4 of the Western Parkland City SEPP. Section 4.41 of the SEPP includes an optional master planning process for large or strategic sites within the Western Sydney Aerotropolis, providing landowners with the opportunity to access an alternative development approval pathway for site-specific planning controls and enabling complying development pathways for future development.

The Western Parkland City SEPP sets out that the Minister for Planning and Public Spaces is the approval authority for both the master plan and precinct plan amendment pathways.

The Department has assessed the master plan against the Aerotropolis planning framework and considers that the master plan is generally consistent with its various aims, visions, and objectives. Further detail is set out in **Section 6** and **Appendix D-F**.

## Engagement

The Department exhibited the master plan between 15 November and 13 December 2024. During the exhibition period, the Department received:

- 7 public submissions
- 1 submission from Liverpool City Council (council) providing comments, and
- 14 government agency submissions (including the Western Sydney International Airport) providing advice or comments.

Key issues raised in public submissions include property acquisition, economic and employment issues and the amount of open space

The master plan is located within the Liverpool LGA. Council requested further consideration of a range of issues including exempt and complying development, riparian corridor design, road network and access, landscaping and tree canopy cover, building heights for high-bay warehousing, design quality strategy, subdivision and retaining walls.

The proponent submitted a response to submissions (RtS) report on 17 February 2024 to address the issues raised in submissions and government agency advice. The Department requested further information to clarify issues in relation to infrastructure coordination, alignment with the planning framework, biodiversity and the design quality strategy. As a result, post-exhibition changes were made to the master plan by the proponent to address the issues raised.

## Assessment

### Key considerations

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

The Department considers the master plan has been prepared in accordance with the master plan requirements and guidelines and is satisfied that the appropriate steps have been followed in its preparation.

The Department has considered the site-specific development controls and alternative benchmark solutions proposed as part of the master plan and is satisfied that they are consistent with both the objectives and performance outcomes of the DCP.

The issues raised in the submissions from the community, interest groups, Council and government agencies have been considered by the proponent in its proposal. In its RtS, the proponent addressed the issues raised and proposed a range of refinements in relation to the planning and design details in the master plan.

The Department is satisfied that the issues raised have been adequately considered and addressed, which are reflected in the changes proposed in the amended master plan.

### Key assessment issues

The key assessment issues for the master plan are design quality, height of buildings, complying development, precinct plan amendments, variations to DCP controls and Western Parkland City SEPP amendments.

### Design quality

The Western Parkland City SEPP allows a design quality strategy under a master plan to take precedence over the design excellence provisions of the SEPP. The proponent worked with the NSW Government Architect (GANSW) to refine the exhibited design quality strategy that provides a scalable approach to achieving design quality for future development. The Department is satisfied that the proposed strategy meets the requirements of the Western Parkland City SEPP and will ensure a high standard of design quality within the site.

### Complying development

Aerotropolis master plans must include complying development provisions so as to allow for a streamlined approach for future development. The proposed master plan accordingly includes a site-specific complying development code (IPG code) that has been refined through the assessment process in response to feedback provided by the Department and other key agencies.

The IPG code will provide a streamlined planning pathway for a broad range and scale of development in the master plan area (for example, high-bay warehouses of 100,000m<sup>2</sup> GFA of a height up to 52.5m), that will potentially cater for future development in the master plan site.

The Department is satisfied that the IPG code responds to feedback and is appropriate for the site's size and intended land use, integrates with the master plan and the design quality strategy to ensure that development responds to its location, minimises impacts, and exhibits a high degree of design quality. Complying development will be consistent with the requirements of the Western Parkland City SEPP, including airport safeguarding requirements, and biodiversity protection. Prior to the issue of a complying development certificate, an aerotropolis certificate is required from the Department, verifying that the development is consistent with the master plan.

### Height of buildings

The precinct plan regulates maximum building heights across the Aerotropolis. The proponent proposes increasing the maximum height of buildings under the precinct plan in parts of the site to facilitate the delivery of high-bay warehousing. The height limits would be increased from 24m to 52.5m. The additional proposed height would only apply to high-bay warehousing development.

The Department is satisfied that the proposed height amendment aligns with the overall goals of the Western Sydney Aerotropolis Plan, the relevant objectives of the precinct plan and the airport safeguarding requirements within the Western Parkland City SEPP.

### Precinct plan amendments

The proponent proposed amendments to several of the figures in the Western Sydney Aerotropolis Precinct Plan (precinct plan), including the land use structure plan, blue-green infrastructure, total water cycle management, transport network, active transport network, street hierarchy, centres hierarchy, height of buildings, floor space ratio, and design competitions.

The proposed amendments intend to align the figures with the refinements proposed as part of the master plan. The Department's assessment concludes that the proposed amendments are consistent with the objectives and requirements of the precinct plan, would result in an improved planning outcome and recommends that the precinct plan be amended as proposed.

### Variations to DCP controls

The master plan includes controls, in addition to the DCP, to guide land use and built form (e.g. height of buildings, floor space distribution, street setbacks), airport safeguarding, earthworks, general development controls (e.g. canopy cover and deep soils, water sensitive urban design, salinity, public art), street network and design, public domain and open space design and recommendations for social and cultural infrastructure.

The proponent proposed a number of alternative solutions to DCP controls, as well as additional controls, which were the subject of TAP consideration and endorsement. The Department worked with the proponent to ensure that the final proposed alternative benchmark solutions and additional controls are consistent with relevant objectives and performance outcomes of the DCP.

### Western Parkland City SEPP amendments

#### Map amendments

The proponent proposes amending the Western Parkland City SEPP land reservation acquisition (LRA), land zoning and transport corridors maps to reflect, relevantly, the proposed locations of stormwater management infrastructure, the land use of the electrical substation and the realignments of the arterial and sub-arterial roads that traverse through and adjacent to the site, as set out in the master plan.

Public submissions raised concern about the proposed changes to the transport corridors map. The Department notes that the transport corridors map amendment is required to reflect realignment of key roads proposed as part of a Transport for NSW (TfNSW)-led safety upgrade to the intersection of Badgerys Creek Road and the future Eastern Ring Road. Any future property acquisitions will follow standard TfNSW processes and timing.



In relation to the proposed amendment to the LRA map, Sydney Water initially objected to the proposal that it acquire all riparian corridors and stormwater infrastructure locations on the site. The Department notes that Sydney Water's draft stormwater scheme for the area limits acquisition to regional stormwater basin land only. In response the proponent reduced its proposed acquisition extent, to Sydney Water's satisfaction.

The Department's assessment found that the map amendments are necessary to reflect the master plan design and State agency requirements.

### **Exempt development**

The proposal includes site-specific exempt development provisions in the Western Parkland City SEPP to facilitate low impact development relating to commercial and enterprise development on the site. They are based on existing provisions within the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP) and State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP) that do not currently apply to the site or have been amended for development specific to the IPG master plan site.

The Department's initial assessment found that in most cases the exempt development amendments were relevant for the development envisaged for the site and were suitable for inclusion in the Western Parkland City SEPP. The remaining development types were considered either more suitable for inclusion in the IPG code as complying development to ensure appropriate development controls could be applied or that an amendment was not necessary as suitable provisions already existed in the Codes SEPP.

The proposal has been amended to incorporate certain types of exempt development into the IPG code so as to be able to be appropriately facilitated as complying development in the future.

## **Conclusion**

The Department's assessment concludes the master plan is acceptable as it has demonstrated consistency with the Aerotropolis planning framework.

The Department is satisfied that the issues raised by government agencies, Council and the community have been adequately addressed by the proponent in its amended master plan and the Department's assessment report. The Department concludes that the master plan is acceptable as it will facilitate future development that would be designed to minimise impacts and mitigate risks.

The Department considers that, if approved, the master plan will enable a new employment generating enterprise estate within the Aerotropolis, that will be able to leverage its position in close proximity to the Western Sydney International Airport and its location on the proposed future major freight movement corridor of the Eastern Ring Road and will exhibit a high degree of design quality and provide well designed active and sustainable open spaces.

The design of the master plan has been informed by connecting with Country principles and ongoing Aboriginal engagement and has taken a landscape-led approach, providing over 45.66 ha of new green space that connects along Badgerys Creek and Wianamatta-South Creek to the wider Aerotropolis and protecting 5.13 hectares of high biodiversity value area (existing native vegetation) (ENV) mapped under the Western Parkland City SEPP.

The master plan is a key component in achieving the vision of the WSAP to create an accessible, innovative and connected city with great places, as it will have the capacity to:

- generate up to 12,429 jobs
- supply 625,467m<sup>2</sup> of employment GFA within its enterprise zone, and
- provide 45.66 hectares of open space.

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

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# 1 Introduction

## 1.1 IPG Badgerys Creek Road Master Plan

The Ingham Property Group (IPG) (the proponent) is seeking master plan approval, under section 4.41 of the Western Parkland City SEPP, to establish a planning control framework for development of an enterprise estate, comprising employment uses, such as warehouse and distribution centres, light industry, and a small-scale local centre including commercial uses, as well as the provision of open space and riparian corridors.

The IPG Badgerys Creek Road Master Plan (master plan) will complement the Western Sydney Aerotropolis Development Control Plan (DCP) by providing additional fine-grain planning controls for the site that will operate alongside a site-specific complying development code and design quality strategy to enable high-quality planning and design of buildings, street layouts and open space.

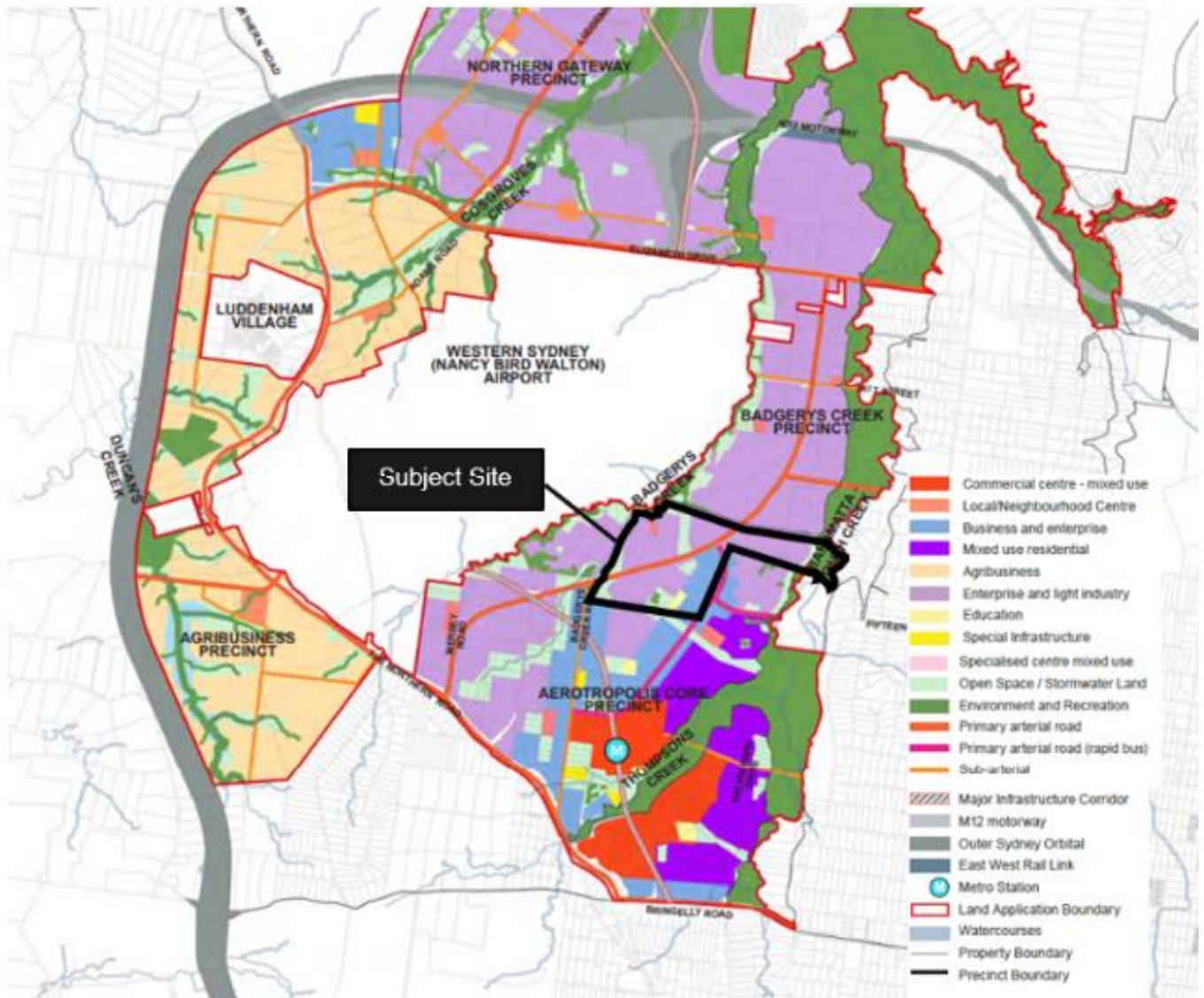
An overview of the master plan (as amended) is provided in **Section 0**. A summary of the key post-exhibition changes made to the master plan since it was initially lodged with the Department is provided in **Section 5**.

## 1.2 Location

The master plan site is situated within the Western Sydney Aerotropolis on Badgerys Creek Road, directly to the south of the Western Sydney International (Nancy-Bird Walton) Airport (WSI).

The site is a large rural lot with a panhandle running to the east along the northern edge. It covers an area of 184 hectares within the Aerotropolis Core Precinct, with road access to Badgerys Creek Road located at the south-western corner, see **Figure 1**.

The site is located at 475 Badgerys Creek Road, Bradfield (lots 99 and 100 in DP1287207) within the Liverpool local government area. The site is positioned 17 kilometres from Liverpool CBD.



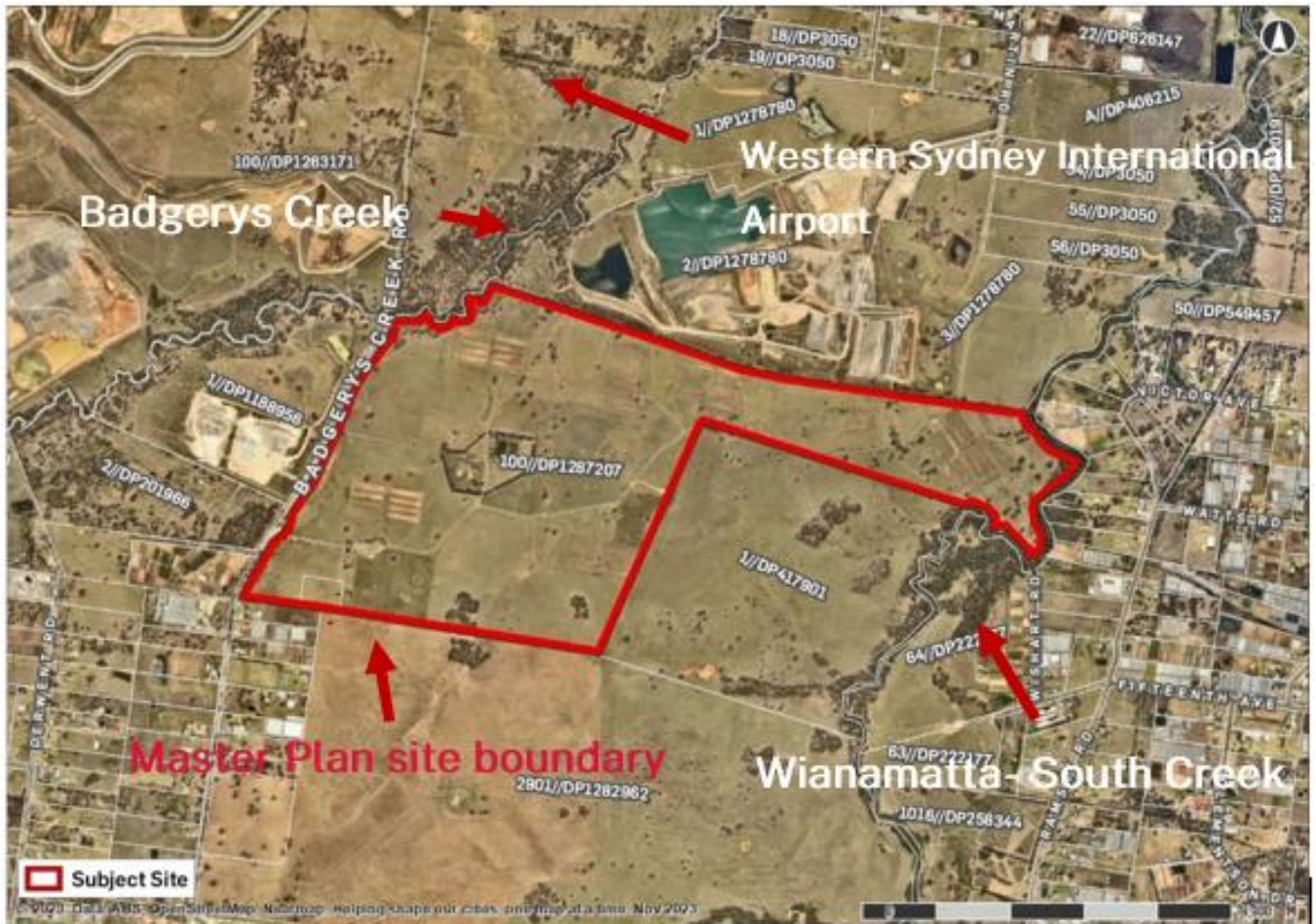
**Figure 1 |** Regional context map (Source: DPHI)

The site, historically used as a chicken farm, has now reverted to pasture for cattle grazing. It has largely been cleared of vegetation, with some established trees remaining along drainage lines. Badgerys Creek runs along the north-western boundary, with Wianamatta-South Creek running along the eastern extent of the site. Large rural landholdings surround the site, used mainly for agricultural purposes, see Figure 2.

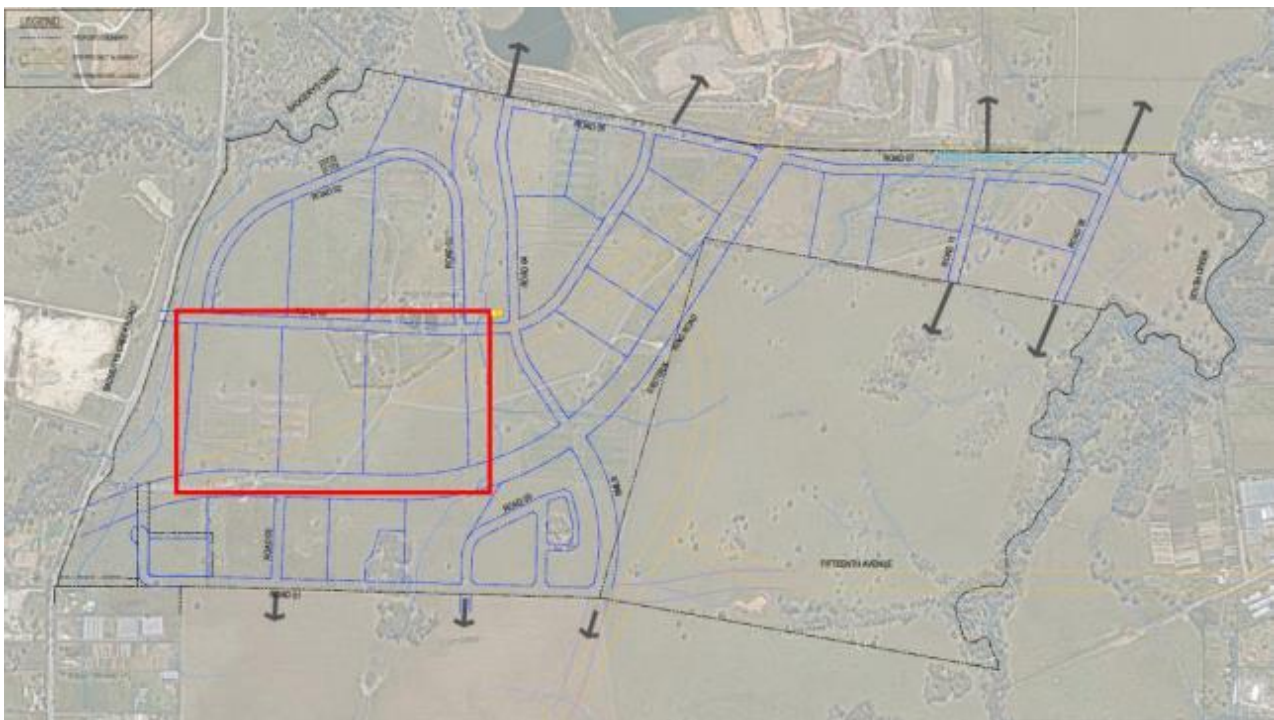
### 1.3 Related projects and works

Secretary's environmental assessment requirements (SEARs) have been issued for a State significant development (SSD) application (SSD-7691969) for an ALDI automated distribution centre within the master plan site. See Figure 3 for the approximate location of the SSD.





**Figure 2 | Master plan site and local context map (Source: Urbis)**



**Figure 3 | Location (red) of the ALDI SSD site within the IPG master plan**

## 2 Master plan

### 2.1 Aerotropolis planning framework

The master plan is required to demonstrate consistency with the Western Sydney Aerotropolis planning framework, which includes:

#### **Western Sydney Aerotropolis Plan (WSAP)**

The WSAP sets out a vision and objectives for the Aerotropolis to capitalise on the opportunities provided by the Western Sydney Airport. Its sequenced approach to planning aims to optimise planned investment in major infrastructure. Master plans are to give effect to the WSAP by ensuring consistency with its objectives and principles.

#### **Western Parkland City SEPP**

The Western Parkland City SEPP provides key development standards, controls and land zoning for development in the Aerotropolis and a framework for the creation and amendment of the precinct plan and master plans. It also provides authority for the master plan guidelines and for the implementation of a complying development pathway under master plans.

#### **Precinct plan**

The precinct plan provides place-based objectives and requirements to guide development in the Aerotropolis. The precinct plan sets out finer grain detail to support land use zoning and other provisions of the Western Parkland City SEPP.

#### **Master plan guidelines**

The master plan guidelines establish the steps in the preparation of a master plan for proponents, the community, councils, and government agencies. Under the master plan guidelines, the master planning process may propose a concurrent amendment to the Western Parkland City SEPP and the precinct plan.

#### **Master plans**

A master plan's primary purpose is to apply place-based development guidance, in addition to the DCP, to sites that are of strategic importance to the Aerotropolis due to size (100 hectares or greater) or catalytic potential and create a site-specific complying development pathway where upfront strategic assessment can suitably manage identified risks. Future development proposals within or adjacent to the master plan site will need to consider, and demonstrate consistency with, the master plan.



## DCP

The DCP provides the planning, design and environmental objectives and controls which will inform the preparation and assessment of development applications (DAs) and master plans.

The consistency of the master plan with the Aerotropolis planning framework is set out in Sections 3 and 4.

## 2.2 Master plan overview

The master plan establishes an urban structure and framework to deliver the vision and objectives for the IPG site.

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

The purpose of the master plan is to guide future development on the site by:

- identifying the vision and objectives for the site
- providing for public art, social and community infrastructure
- detailing the development staging and infrastructure delivery for the site
- establishing complying development provisions
- establishing a site-specific design quality strategy
- communicating the planning, design and environmental objectives and controls for future development
- ensuring the orderly, efficient, and environmentally sensitive development of the land, including meeting the terms of the biodiversity certification order under the Growth Centres SEPP, and
- promoting high-quality urban design and environmental outcomes.

## 2.3 Master plan application

The master plan comprises:

- a vision and principles for the integrated employment precinct
- designing with Country themes and built-form principles
- design quality strategy
- complying development provisions, and

- site-specific development controls and associated maps to define the precinct structure and guide land use, built form and building design, movement networks, public domain and open space.

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

- amendments to the land reservation acquisition map, transport corridors map and land zoning map within the Western Parkland City SEPP (Figure 4), and
- amendments to the precinct plan.

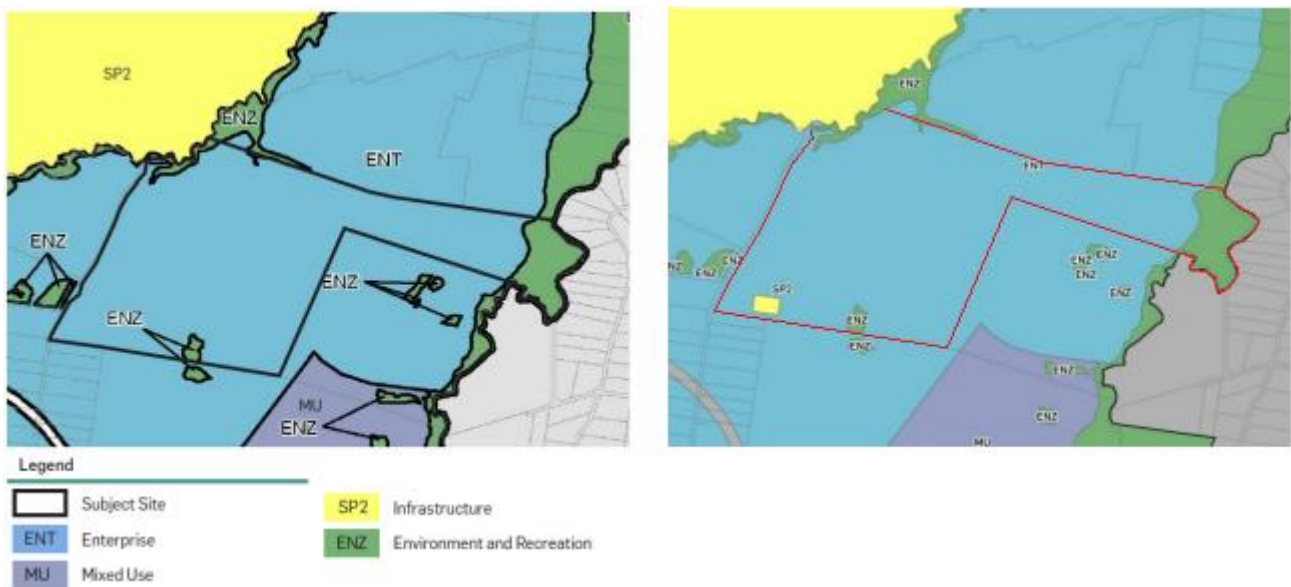
The master plan application is supported by a range of technical documents and strategies. A link to the master plan and the full list of supporting documents is provided in **Appendix A**.

Key aspects of the master plan are outlined in **Table 1**.

**Table 1 | Key aspects of the master plan**

Aspect	Description
Master plan area	<ul style="list-style-type: none"> <li>• 184 hectares</li> </ul>
Uses and activities	<ul style="list-style-type: none"> <li>• enterprise zone (ENT): light industry and employment uses including professional services, high technology, aviation, logistics, food production and processing, health, education and creative industries.</li> <li>• environment and recreation zone (ENZ): protect and restore areas of ecological and cultural value and provide recreational settings and activities.</li> <li>• proposed SP2 Infrastructure zone: to reflect electrical substation use</li> </ul>
Built form	<ul style="list-style-type: none"> <li>• employment and commercial development with indicative maximum building heights ranging from 24m to 52.5m</li> </ul>
Gross floor area (GFA)	<ul style="list-style-type: none"> <li>• enterprise and light industry: 506,530 sqm GFA</li> <li>• business and commercial: 118,417 sqm GFA</li> <li>• retail: 520 sqm GFA</li> </ul>
Open space	<ul style="list-style-type: none"> <li>• 45.66 hectares of open space and landscaped areas consisting of active and passive open space areas, including 5.13 hectares of high biodiversity value area (existing native vegetation) (ENV), across three riparian corridors and the park within the local centre.</li> </ul>
Exempt development	<ul style="list-style-type: none"> <li>• site-specific exempt development provisions for low impact works to be progressed without approval, subject to development standards.</li> </ul>
Complying development	<ul style="list-style-type: none"> <li>• site-specific complying development code for low-complexity, straight forward development to be progressed, subject to certification that relevant requirements have been met and compliance with conditions of approval.</li> </ul>

Aspect	Description
Jobs	<ul style="list-style-type: none"> <li>approximately 12,429 jobs</li> </ul>
Estimated development cost (EDC)	<ul style="list-style-type: none"> <li>\$524 million</li> </ul>
Staging and sequencing	<ul style="list-style-type: none"> <li>development is proposed to take place over 7 stages.</li> </ul>



**Figure 4 |** Existing (left) and proposed (right) land use zoning under Western Parkland City SEPP

Key chapters of the master plan are described in Table 2.

**Table 2 |** IPG Master plan chapters

Chapter	Description
1. Introduction	<ul style="list-style-type: none"> <li>outlines the purpose, application and status of the master plan, its relationship with instruments and other documents and the development contributions framework.</li> </ul>
2. Context	<ul style="list-style-type: none"> <li>locates the master plan within the Aerotropolis planning framework, geographical context for the master plan and outlines the master plan process.</li> </ul>
3. Vision and principles	<ul style="list-style-type: none"> <li>details the overarching vision for the master plan <i>'...the site will be recognised by its 'landscape-focused' design, aimed at attracting leading businesses and fostering a vibrant and sustainable employment precinct...'</i></li> <li>identifies five key themes including connecting with Country, connectivity, productivity, liveability and sustainability.</li> </ul>

Chapter	Description
4. Designing with Country	<ul style="list-style-type: none"> <li>sets out the key master plan designing with Country themes, provides a summary of the master plan response to Country and outlines the designing with Country principles.</li> </ul>
5. Land use and built form	<ul style="list-style-type: none"> <li>establishes development controls for proposed land uses, subdivision strategy, height of buildings, floor space distribution, building setbacks, building separation, street frontage, building typology, site massing and design principles.</li> </ul>
6. Movement	<ul style="list-style-type: none"> <li>identifies the proposed active transport network, public transport network and road network within the master plan.</li> </ul>
7. Blue and green infrastructure	<ul style="list-style-type: none"> <li>details the blue and green infrastructure strategy including the blue green strategy, open space objectives, riparian corridors design principles, stormwater and drainage principles and landscaping for enterprise and industrial developments with the site.</li> </ul>
8. Sub-precincts and centres	<ul style="list-style-type: none"> <li>identifies the role and intent of the sub-precincts and centres in the master plan and sets out additional controls for the local centre, local park, amenity nodes, western parcel and eastern parcel.</li> </ul>
9. Public art, social and community infrastructure	<ul style="list-style-type: none"> <li>provides indicative locations and recommendations for social and cultural infrastructure including education training spaces, community centres, day cares, medical centres, local park and multi-purpose sports court while also detailing the public art strategy.</li> </ul>
10. Staging and infrastructure delivery	<ul style="list-style-type: none"> <li>outlines the seven stages of development and the infrastructure and utility deliver plan for the site.</li> </ul>
11. Development pathway	<ul style="list-style-type: none"> <li>details future development pathways for exempt development, complying development, development applications and notes the need for concurrence and referrals and aerotropolis certificates.</li> </ul>
12. Complying development code	<ul style="list-style-type: none"> <li>provides an overview of the complying development code to inform all development that is eligible for a complying development pathway within the master plan site.</li> </ul>
13. Design quality strategy	<ul style="list-style-type: none"> <li>sets out site-specific design quality provisions that identify objectives, considerations and requirements for demonstrating design quality outcomes and details the design quality review and verification process.</li> </ul>

## 2.4 Physical layout and design

The master plan establishes the urban structure and layout to deliver the vision and objectives for the light industrial and enterprise estate. The design of the master plan has been informed by connecting with Country principles and ongoing Aboriginal engagement and has taken a landscaped approach, preserving and providing 45.66 hectares of open space and landscaped areas



consisting of active and passive open space areas across three riparian corridors and the local park within the local centre.

The master plan site is predominately zoned for enterprise use with some small areas zoned for environment and recreation use under the Western Parkland City SEPP. The site contains three riparian corridors located along the western boundary and Badgerys Creek Road, eastern boundary panhandle and Wianamatta-South Creek and centrally through the site from the north to south boundary. A zone substation is located to the south-west of the site within the proposed SP2 Infrastructure zone. Located within the south-east of the site is the proposed centralised local centre. For zoning applicable to the site see **Figure 4**.

Badgerys Creek Road is the main existing transport connection from the site. Future transport connections include:

- the Eastern Ring Road, a primary arterial road traversing the site from the northern boundary to the south-western boundary which will link Elizabeth Drive to the Northern Road
- Bradfield Metro Link Road which will link the Eastern Ring Road at the east of the site to Bradfield City Centre, and
- Fifteenth Avenue which will connect Liverpool to the Bradfield Metro Link Road.

The Eastern Ring Road, Bradfield Metro Link Road, Fifteenth Avenue and Badgerys Creek Road are all proposed to be re-aligned under the master plan.



**Figure 5 | IPG Badgerys Creek Road Master Plan – Structure plan (Source: Urbis)**

## 2.5 Land uses and built form

Consistent with the precinct plan, the master plan comprises a range of land uses, including enterprise and industry, a local centre, open space and a zone substation (see [Figure 5](#)).

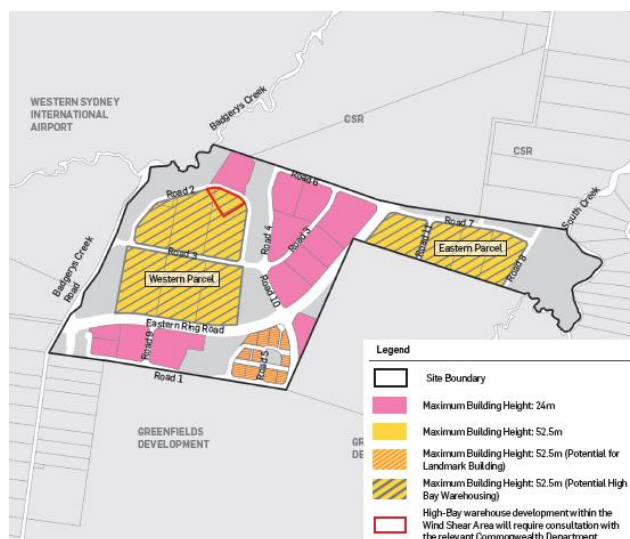
Although the proposed land uses largely conform to the precinct plan, the master plan proposes adjustments to lot layouts and road configurations, which consequently modify the land use structure outlined in the precinct plan.

Most of the developable area on the site has an enterprise and industry land use, which allows a wide range of commercial and light industrial uses, predominantly warehouse and logistic uses with offices, parking and amenities incorporated on the site. The local centre primarily provides commercial, and office uses with ground level retail to support the site and the surrounding context. Recreational areas on the site consist of open space, playing areas and the major riparian corridors with integrated stormwater basins and active transport pathways.

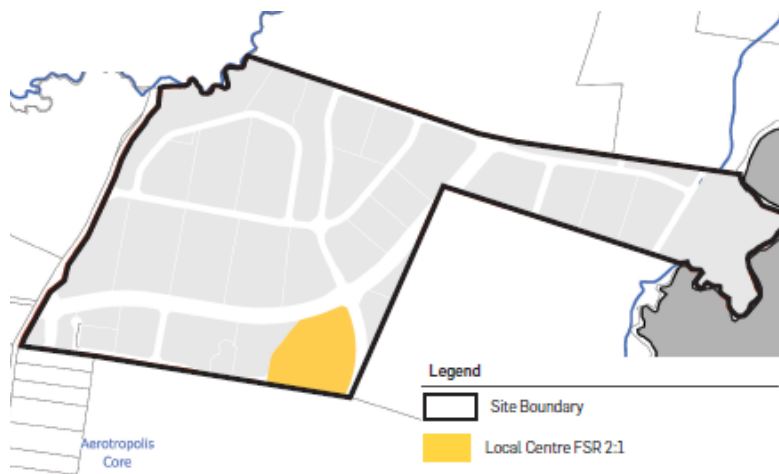
The master plan guides the appropriate height and scale of buildings across the site centre by setting the maximum building heights, ranging between 24m and 52.5m (see [Figure 6](#) [6Figure 7](#)[Error! Reference source not found.](#)), amending the height controls in the precinct plan in certain

areas. The 52.5m height limit applies specifically to high-bay warehousing in the western and eastern parcels and commercial buildings within the local centre.

It also provides a floor space distribution map to ensure permissible floor space is appropriately distributed to align with the scale of built form envisaged under the master plan (see Figure 7Error! Reference source not found.). A FSR of 2:1 is set out for the local centre, with no FSR set out for the remainder of the site. However, the master plan includes a total of 625,467 sqm of indicative gross floor area (GFA), with a cap placed on GFA for commercial and retail floor space in the local centre.



**Figure 6 |** Height of buildings (Source: Urbis)



**Figure 7 |** Floor space distribution (Source: Urbis)

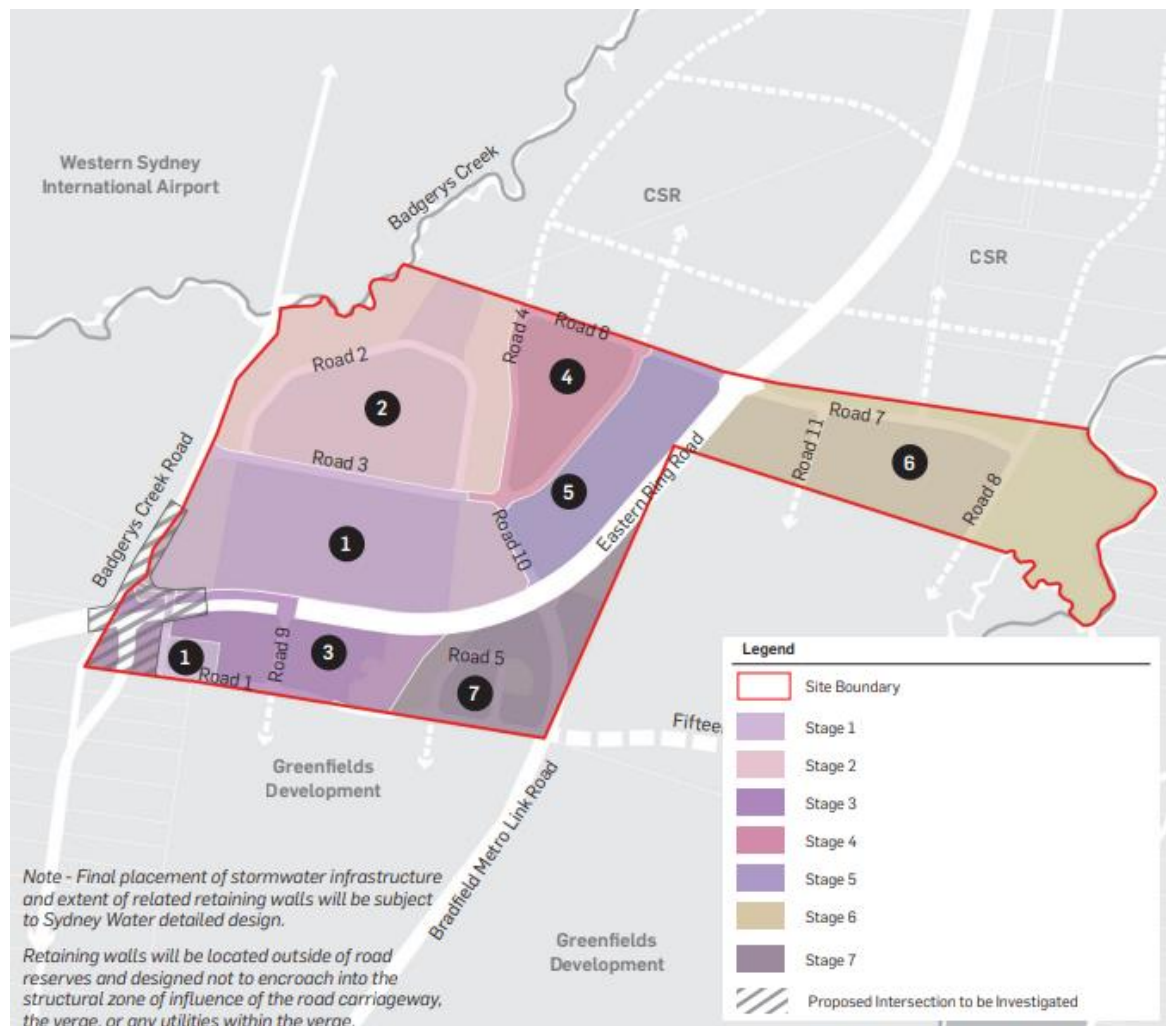
The master plan establishes a design quality strategy and framework for the assessment of design quality for the site. A design quality review hierarchy ensures an appropriate review of design quality for future development involving new buildings depending on the scale and location of the building.

## 2.6 Staging and sequencing

The master plan will be developed in seven stages (see Figure 8). The staging of the master plan is based on the planned delivery of road infrastructure within the site, with roll-out subject to market demand. Development of stages 1-6 will progress from the west to the east, independent of the construction of the Eastern Ring Road, the Bradfield Metro Link Road, and the intersection of Badgerys Creek Road with the Eastern Ring Road.

Land to the east of Road 8, designated for stormwater infrastructure and open space, will remain in private ownership until Stage 6 of the master plan. Land acquisition for open space and stormwater infrastructure in this area will be negotiated with relevant acquisition authorities prior to development of stage 6. Development of stage 7, which is framed by the future Eastern Ring Road

and Bradfield Metro Link Road, will be dependent on the timing of delivery of these key roads construction of which, according to the Infrastructure NSW (INSW) Aerotropolis Sector Plan, is not projected to occur until 2040.



**Figure 8 | Master plan staging plan (Source: Urbis)**

## 3 Strategic context

### 3.1 Key strategic plans

The master plan is consistent with the strategies, plans and policies outlined in **Table 3** below, and therefore the Department considers it appropriate for the site.

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

Strategy, plan or policy	Consistency	Comments
Greater Sydney Region Plan	Consistent	The plan outlines how Greater Sydney will manage growth and change and guide infrastructure delivery. It sets the vision and strategy for Greater Sydney to be implemented at a local level through district plans. The IPG master plan site is located directly adjacent to the WSI and within the Aerotropolis core. The site is part of the western economic corridor, which the Greater Sydney Region Plan identifies as a strategic hub for globally significant defence and aerospace activities. The master plan aligns with the plan by locating jobs close to transport infrastructure and open space.
Western City District Plan	Consistent	The plan outlines how over the next 20 years the Western Parkland City will transform, drawing on the strength of the WSI and the Aerotropolis. The site is situated within the western city district, where the district plan outlines priorities and actions to enhance residents' quality of life. By 2036, the district is projected to accommodate 464,450 new residents, 370,200 jobs, and 184,500 dwellings. To support this growth, the plan emphasises economic corridors, growth areas, and infrastructure connections between strategic and metropolitan centres. The site is primarily designated for enterprise and industry, accommodating light industrial businesses and local centres to support future employment growth. Additionally, around 25% of the site has been dedicated to riparian corridors, passive open spaces, and water management facilities ensuring sustainable development aligned with the district plan's priorities.
Western Sydney Aerotropolis Plan (WSAP) 2020	Consistent	The WSAP sets out a vision for the Aerotropolis of an accessible, innovative, connected city framed by the extensive blue and green corridors of the region and with the city's structure and buildings shaped through a landscape-led approach, with all work guided by the overarching objective to recognise Country. It sets out a sequenced approach to precinct planning to optimise planned investment in major infrastructure that responds to the opportunities provided by the 24/7 operations of the WSI and create the impetus for early activation of the Aerotropolis.



Strategy, plan or policy	Consistency	Comments
		<p>The master plan is consistent with the planning principles set out in the WSAP, which apply to all planning for the Aerotropolis, as it:</p> <ul style="list-style-type: none"> <li>• has been designed from a landscape led approach that includes retaining and revitalising riparian corridors, providing integrated water sensitive urban design (WSUD) strategies to manage water, preserving and providing open space and landscaping to support environmental and cultural values</li> <li>• contributes to the Aerotropolis becoming a regionally and internationally significant employment area by providing for future commercial and employment land uses consistent with the land use zonings of the Western Parkland City SEPP</li> <li>• has been designed by considering the location, alignment and arrangement of the existing major infrastructure corridors and planned transport linkages to ensure the efficiency of the future transport network within, and to, the site</li> <li>• delivers pedestrian, cycling and public transport networks integrated within the Aerotropolis transport network to facilitate active movement</li> <li>• has been prepared in response to social infrastructure needs study, that provides a breakdown of relevant facility requirements for the site including health, education, arts, and creativity</li> <li>• followed a designing with Country framework, acknowledging cultural values and integrating cultural principles into landscape design and local spaces</li> <li>• has been prepared in consideration of special infrastructure contributions and local infrastructure contributions.</li> </ul>
Aerotropolis Sector Plan	Consistent	<p>The Aerotropolis sector plan, prepared by Infrastructure NSW (INSW), while not part of the Aerotropolis planning framework, is a key document that provides an understanding of how and when infrastructure delivery priorities will service land.</p> <p>The sector plan notes that the two current private sector-led master plans (IPG and GDC), in addition to the approved Bradfield City Centre master plan, represent an investment of more than \$15.2 billion.</p> <p>The IPG master plan site sits within the Aerotropolis core precinct. While the sector plan noted that key constraints to development in the Aerotropolis core are Badgerys Creek Road and the Eastern Ring Road, traffic modelling undertaken for the IPG master plan, and verified by Transport for NSW, demonstrates that the current road network can support the full development of warehouse and industrial development on the site and is not constrained by the need for new road infrastructure.</p>

Strategy, plan or policy	Consistency	Comments
		<p>The Aerotropolis core will be served by a regional stormwater system that includes wetlands, basins and open naturalised channels. IPG will likely deliver regional basins on behalf of Sydney Water through works in kind arrangements.</p> <p>The sector plan analyses and prioritises transport and water-related projects in the Aerotropolis core precinct that will enable development across 3-time horizons. These horizons align with development stages and WSI Airport operations. In relation to the IPG site:</p> <ul style="list-style-type: none"> <li>• 2027 - early operations and surrounding development <ul style="list-style-type: none"> <li>○ safety and interim upgrade works along Badgerys Creek Road will cater for increasing truck movements and new bus services</li> <li>○ water and wastewater services will be available</li> </ul> </li> <li>• 2030 - investments to support further growth <ul style="list-style-type: none"> <li>○ construction of a major upgrade and new roadway sections for Fifteenth Avenue (Liverpool to Airport Transit Corridor) will improve accessibility to the site for workers.</li> </ul> </li> <li>• 2040 - future priorities <ul style="list-style-type: none"> <li>○ Eastern Ring Road and a major upgrade to Badgerys Creek Road South is a key priority and will enable development of the local centre, the final stage (Stage 7) of the site.</li> </ul> </li> </ul>

## 4 Statutory context

### 4.1 Approval authority and planning pathways

Details of the legal pathway under which approval is sought for the master plan, along with the permissibility and planning pathways for future development proposals, are provided in Table 4.

**Table 4** | Approval authority and planning pathways

Consideration	Description
<b>Approval authority</b>	<ul style="list-style-type: none"><li>Minister for Planning and Public Spaces under Sections 4.41 and 4.38 of Part 4.7 of the Western Parkland City SEPP</li></ul>
<b>Land use permissibility</b>	<ul style="list-style-type: none"><li>the master plan site is land identified as enterprise zone, and environment and recreation zone under the Western Parkland City SEPP.</li><li>the commercial and employment uses envisaged in the enterprise zone are permissible with consent.</li><li>conservation and recreation uses are permissible within the environment and recreation zone, consistent with desired master plan outcomes for these areas of the site.</li><li>the transport corridors map shows a primary arterial road (the future Eastern Ring Road), Fifteenth Avenue and an arterial road (Badgerys Creek Road) as affecting the site. An amendment to the Western Parkland City SEPP is proposed to ensure permissibility by realigning these roads with the master plan design.</li><li>an SP2 Infrastructure zone is proposed to ensure that the electrical substation use on lot 99, DP1287207 is permissible.</li></ul>
<b>Future development pathways</b>	<ul style="list-style-type: none"><li>the master plan does not seek approval for any development or works. Any future development will be subject to separate planning pathways and approvals, as required.</li><li>under Section 4.42 of the Western Parkland City SEPP, the consent authority for development must consider the master plan before granting consent for development on the master plan site or adjacent land.</li></ul>

## 4.2 Master plan requirements

The master plan guidelines set out the requirements for preparing, issuing and addressing master plan requirements (MPRs). The Department is satisfied that the master plan addresses the matters set out in the MPRs issued on 17 October 2022 and is sufficient to enable an adequate consideration and assessment of the master plan for determination purposes. The Department's consideration of the proponent's response to the MPR's is at **Appendix D, Table 6**.

## 4.3 Matters for consideration

### 4.3.1 Objects of the EP&A Act

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

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

### 4.3.2 EP&A Regulation

The requirements under the *Environmental Planning and Assessment Regulation 2021* (Regulation) relate to future development on the site. The master plan is not a form of development consent.

#### Requirements for development applications

The Regulation requires that development applications for land in the Aerotropolis are accompanied by an assessment of the consistency of the development with the WSAP and the precinct plan.

#### Requirements for complying development – Aerotropolis certificates

Applications for complying development certificates in the Aerotropolis are required to be accompanied by an Aerotropolis certificate. Provisions for the application and determination of Aerotropolis certificates are set out in Chapter 4 of the Western Parkland City SEPP. An Aerotropolis certificate cannot be issued unless the Planning Secretary is satisfied that the development is consistent with the master plan.

### 4.3.3 Aerotropolis Planning Framework

The Department has assessed the master plan against the Aerotropolis planning framework, including:

- WSAP
- Western Parkland City SEPP
- Precinct plan
- Master plan guidelines, and
- DCP.

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

#### 4.3.4 Matters required by Western Parkland City SEPP

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

##### Master plan considerations

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

**Table 5 | Matters for consideration under Section 4.41**

Matters	Consideration
(1) The Minister may approve a master plan that applies to specified land to which this Chapter applies.	The master plan is located within the Western Sydney Aerotropolis to which the chapter applies.
(1A) A master plan may only apply to land to which a precinct plan applies	The precinct plan applies to the master plan site.
(2) A master plan must-	-
(a) (repealed)	-
(b) specify the particular development that may be carried out as complying development on the land to which the master plan applies, and	The master plan includes a range of specified development that may be carried out as complying development.
(c) contain development controls for the complying development, and	The master plan contains development controls for the specified complying development.



Matters	Consideration
(d) contain the matters required by the master plan guidelines	The preparation of the master plan has been undertaken in accordance with the master plan guidelines. In this regard, the master plan requirements were addressed. Further consideration of consistency with the master plan requirements can be found at <b>Appendix D Table 5</b> .
(3) The Minister may approve a master plan only-	
(a) With the consent of the owner of land to which the master plan applies, and	The proponent owns the site and has provided its consent.
(b) If satisfied that the master plan is consistent with the master plan guidelines, and	As required by the master plan guidelines the proponent developed the draft master plan in accordance with the master plan requirements and engaged in the TAP process. The master plan received endorsement from the TAP on 3 May 2024 to lodge the master plan with the Department for assessment. Further consideration of consistency with the master plan guidelines can be found at <b>Appendix D Table 5</b> .
(c) If the Minister has considered whether the master plan is consistent with the DCP, and	The proponent has demonstrated that the master plan is consistent with the relevant objectives and performance outcomes of the DCP and has adequately justified proposed variations to DCP controls. Further consideration of the consistency of the master Plan with the DCP can be found at <b>Appendix D</b> . Further assessment of the proposed variations to the DCP can be found in <b>Section 6</b> and <b>Appendix F</b> .
(d) If satisfied that <ul style="list-style-type: none"> <li>i) the master plan is consistent with the Precinct Plan or</li> <li>ii) the inconsistency is appropriate, taking into account the master plan guidelines.</li> </ul>	The proponent has demonstrated that the master plan is consistent with the relevant objectives and requirements of the precinct plan. Further consideration of the consistency of the master plan with the precinct plan can be found at <b>Appendix D</b> .
(4) A draft master plan is to be published on the NSW planning portal for at least 28 days before it is approved by the Minister.	The draft master plan was exhibited on the NSW planning portal for 28 days.

Matters	Consideration
(5) A master plan approved by the Minister must be published on the NSW planning portal and takes effect on the day it is so published.	If approved, the master plan will be published on the NSW planning portal and take effect from that date.
(6) A master plan has effect for 5 years from the date it is approved by the Minister or a longer period approved by the Minister.	The master plan is proposed to have effect for 40 years from approval.

### Precinct plan amendment considerations

The master plan seeks to amend the precinct plan to reflect the street layout, riparian corridors, land uses and infrastructure set out by the master plan.

Under the Western Parkland City SEPP, development consent cannot be granted unless the consent authority is satisfied that the development is consistent with the precinct plan. Additionally, development consent cannot be granted unless the consent authority has considered any master plan applying to the site. To ensure alignment between a master plan and the precinct plan, the master plan guidelines state that the precinct plan may be amended where a superior planning outcome and consistency with the Aerotropolis planning framework can be achieved.

Section 4.38 of the Western Parkland City SEPP outlines the matters that the Minister must take into consideration when determining precinct plan amendments. These matters are summarised in Table 6. The Department considers that the proponent has adequately justified proposed amendments to the precinct plan to reflect the master plan design. Further assessment of the proposed precinct plan amendments can be found in Section 6 and Appendix E.

**Table 6 | Matters for consideration under Section 4.38**

Matters	Consideration
(1) A precinct plan is to be prepared by the Planning Secretary and must be approved by the Minister.	The amended precinct plan has been prepared by the Secretary and will be considered by the Minister for approval.
(2) A precinct plan is to apply to specified land (a precinct) to which this Chapter applies.	The precinct plan and chapter apply.

Matters	Consideration
<p>(3) A precinct plan must contain the following—</p> <ul style="list-style-type: none"> <li>(a) the strategic vision and general objectives for the precinct,</li> <li>(b) a map showing proposed land uses for land in the precinct,</li> <li>(c) the performance criteria for development on land in the precinct,</li> <li>(d) proposals for public utility infrastructure, roads and transport on land in the precinct,</li> <li>(e) proposals for total water cycle management for the precinct.</li> </ul>	<p>The amended precinct plan contains the required matters.</p>
<p>(3A) A precinct plan may contain other matters the Planning Secretary considers appropriate.</p>	<p>No other matters are considered appropriate.</p>
<p>(4) A precinct plan must be consistent with this Chapter.</p>	<p>The amended precinct plan is consistent with this Chapter.</p>
<p>(5) A draft precinct plan is to be published on the NSW planning portal for at least 28 days before it is approved by the Minister.</p>	<p>The draft precinct plan amendments were exhibited on the NSW planning portal for 28 days.</p>
<p>(5A) Before approving a precinct plan, the Minister must consult the Western Parkland City Authority about the following matters—</p> <ul style="list-style-type: none"> <li>(a) whether the plan appropriately provides for creating active, vibrant and sustainable communities and locations that support— <ul style="list-style-type: none"> <li>(i) national and global business, and</li> <li>(ii) the Airport,</li> </ul> </li> <li>(b) whether the plan appropriately supports the economic growth and development of the Western Sydney Aerotropolis by— <ul style="list-style-type: none"> <li>(i) encouraging investment, and</li> <li>(ii) providing for land uses that generate employment opportunities,</li> </ul> </li> <li>(c) whether the infrastructure proposed by the plan is likely to be developed in an efficient and timely way.</li> </ul>	<p>The Western Parkland City Authority, (known as the Bradfield Development Authority) was consulted and provided a response that endorsed the amended precinct plan.</p>
<p>(6) A precinct plan approved by the Minister must be published on the NSW planning portal and takes effect on the day it is so published.</p>	<p>If approved, the amended precinct plan will be published on the NSW planning portal and take effect from that date.</p>

Matters	Consideration
(7) A precinct plan may be amended, and this section applies to the amendment of the precinct plan in the same way as it applies to a precinct plan.	The proposal is an amendment to the precinct plan. This chapter applies and has been considered.

# 5 Engagement

## 5.1 Preparation of master plan requirements

During the preparation of the master plan requirements for the proposal, the Department consulted with relevant government agencies and local councils in accordance with the master plan guidelines.

## 5.2 Technical Assurance Panel process

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

On 10 October 2022, the TAP for the draft IPG Badgerys Creek Road Master Plan was established and held its first meeting with the proponent. The TAP membership comprised representatives from Council and government agencies listed in **Appendix D**.

The TAP co-design process spanned 20 months and involved 8 meetings and 9 technical workshops. It sought to identify and resolve key planning issues for the master plan early in the planning process, including:

- exempt and complying development strategy
- design quality and designing with Country
- land use and open space
- stormwater infrastructure and water cycle management
- street network, hierarchy and ownership
- staging, funding and infrastructure delivery
- noise impacts
- biodiversity, hazards, and conservation
- landscaping
- structure of the explanation of intended effects (EIE)
- proposed amendments to the precinct plan, and
- proposed variations to the DCP.

On 3 May 2024, the Independent Chair issued a Letter of Advice (**Appendix G**) for the draft IPG Badgerys Creek Road Master Plan to the Secretary of the Department, recommending that the



master plan was suitable for lodgement, subject to a number of recommendations. The recommendations included:

- working with GANSW, in respect to the design excellence strategy to ensure all future development will exhibit design excellence, including future complying development and development applications
- working with Council and the Department to finalise the public art strategy
- engaging with Council and Sydney Water to confirm acquisition responsibilities for stormwater infrastructure, local open space and drainage, and
- submitting the draft complying development code for a further review by the Department.

## 5.3 Exhibition of the master plan

### 5.3.1 Public exhibition of the master plan

After accepting lodgement of the master plan on 1 October 2024, the Department:

- publicly exhibited the master plan from 15 November 2024 until 13 December 2024 on the NSW planning portal, including:
  - the master plan
  - an EIE for proposed Western Parkland City SEPP amendments
  - proposed precinct plan amendments
  - proposed DCP variations, and
  - supporting technical documents
- notified occupiers and landowners in the vicinity of the site about the public exhibition, and
- notified and invited comment from relevant government agencies and Council.

Exhibited documents can be accessed on the planning portal at:

<https://pp.planningportal.nsw.gov.au/draftplans/under-consideration/draft-ipg-badgerys-creek-road-master-plan>

### 5.3.2 Summary of advice received from government agencies

The Department received advice from 14 government agencies on the master plan.

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

**Table 7 | Summary of agency advice**

Agency	Advice summary
<b>Bradfield Development Authority (BDA)</b>	<p>BDA provided the following comments:</p> <ul style="list-style-type: none"> <li>• Aerotropolis framework should be updated to reflect changes proposed in the draft master plan, such as the realignment of Eastern Ring Road and impacts on surrounding properties, infrastructure, and land acquisition.</li> <li>• the BDA supports the proposed amendments to the precinct plan.</li> </ul>
<b>Sydney Water</b>	<p>Sydney Water provided the following comments:</p> <ul style="list-style-type: none"> <li>• water and wastewater servicing be available to service the development.</li> <li>• the site will connect to the Upper South Creek Advanced Water Recycling Centre.</li> <li>• further details and amendments required before stormwater servicing is endorsed.</li> <li>• infrastructure contributions for servicing will be required.</li> <li>• land reservation mapping must be updated to reflect the regional stormwater infrastructure footprints.</li> <li>• complying development will need to be able to demonstrate compliance with the waterway health targets either by connection to the regional stormwater scheme (when available) or through interim on lot measures.</li> </ul>
<b>NSW Rural Fire Service (RFS)</b>	<p>The RFS provided the following comments relating to future developments:</p> <ul style="list-style-type: none"> <li>• the master plan generally aligns with the aim and objectives of Planning for Bush Fire Protection (PBP) 2019 and future developments will need to comply with the relevant sections of PBP 2019.</li> <li>• the Vegetation Management Plan must be implemented to minimize bushfire risk, with plans of management required for council or government lands without guaranteed future management.</li> <li>• special fire protection purpose (SFPP) development such as education are permissible in the Enterprise zone and must be located away from bushfire hazards and comply with PBP 2019.</li> <li>• reticulated water supply, hydrants, and utilities must be provided throughout the development to support firefighting operations.</li> <li>• the Bushfire assessment report confirms that all proposed lots meet the minimum BAL-29 construction standard, provided asset protection zones are established.</li> </ul>
<b>Department of Primary Industries (DPI) - Fisheries</b>	<p>DPI Fisheries made the following comments and recommendations:</p> <ul style="list-style-type: none"> <li>• implement buffer zones around the creeks as per DPIRD Fisheries policy, recommending a 50-meter buffer for class 2-3 waterways, measured from the top of the bank.</li> <li>• ensure lateral connectivity between aquatic and riparian habitats, minimizing infrastructure within the buffer zones such as terraces, retaining walls, and pathways.</li> <li>• enhance in-stream fish habitats, including native vegetation and snags.</li> </ul>

Agency	Advice summary
	<ul style="list-style-type: none"> <li>artificial habitats like WSUD ponds must provide connectivity with upstream natural habitats, ensuring continuous fish passage.</li> </ul>
<b>Transport for NSW (TfNSW)</b>	<p>TfNSW provided the following comments and recommendations:</p> <ul style="list-style-type: none"> <li>a condition should be added requiring TfNSW consultation during the site design phase on pedestrian access points, prior to issuing an Aerotropolis Certificate. A record of consultation must be submitted to the Planning Secretary.</li> <li>draft travel plans for individual sites should be submitted to TfNSW for review before issuing an Aerotropolis certificate, with TfNSW endorsement required in writing.</li> <li>the proponent should amend the complying development code to ensure that essential road infrastructure is available when needed, and that transport network capacity is sufficient for a gross floor area of 507,000m<sup>2</sup>. An updated Transport Management and Accessibility Plan (TMAP) must be submitted for review before development approval and updated within 5 years or when the floor area exceeds 407,920m<sup>2</sup>. A TMAP addendum, including transport modelling approved by TfNSW, is required for complying development applications.</li> <li>the complying development code should be amended to remove the 28-day response timeframe goal for TfNSW's endorsement of Travel Plans.</li> </ul>
<b>NSW Environmental Protection Agency (EPA)</b>	<p>EPA provided the following comments and recommendations:</p> <ul style="list-style-type: none"> <li>the asbestos management plan should be enforced through a statutory instrument, like the master plan or development control plan.</li> <li>additional air quality assessment and dust management measures should be provided.</li> <li>the noise assessment is in line with discussions between the EPA, DPHI and IPG.</li> <li>future noise assessments for developments should: <ul style="list-style-type: none"> <li>reference the noise limits in the current assessment.</li> <li>demonstrate compliance at the nearest receivers within the noise catchment.</li> </ul> </li> <li>the Waste Management Plan requires amendment to ensure that proper testing and verification before reusing any fill.</li> </ul>
<b>NSW State Emergency Service (SES)</b>	<p>The SES provided the following comments:</p> <ul style="list-style-type: none"> <li>the development should comply with the NSW Flood Prone Land Policy and Flood Risk Management Manual 2023.</li> <li>design features to improve safety must be considered, like flood-free access/egress and positioning of basement openings above the probable maximum flood (PMF) level, and flood awareness for all site users, including through site inductions and signage.</li> </ul>
<b>Western Sydney International (WSI)</b>	<p>WSI provided the following comments and recommendations:</p> <ul style="list-style-type: none"> <li>airport safeguarding measures require the relevant Commonwealth body's approval, particularly regarding construction activities like cranes.</li> <li>the site is located near an airport, necessitating safeguarding against impacts like aircraft noise, windshear, and turbulence.</li> </ul>

Agency	Advice summary
	<ul style="list-style-type: none"> <li>parts of the site are within the wildlife buffer area and subject to regulations for wildlife and airspace.</li> <li>the proposed development will affect road networks, particularly The Northern Road, Elizabeth Drive, and Eastern Ring Road, potentially causing congestion. The traffic impact is based on outdated models, and there's concern over the accuracy of traffic generation rates and the adoption of unrealistic mode share targets.</li> </ul>
<b>Endeavour Energy</b>	<ul style="list-style-type: none"> <li>Endeavour Energy recommended continued engagement to ensure a suitable electricity supply is available as the project progresses.</li> </ul>
<b>Civil Aviation Safety Authority</b>	<ul style="list-style-type: none"> <li>CASA confirmed that the <i>Airports (Protection of Airspace) Regulations 1996</i> will be enforced if concerns about the development's impact on aircraft operations arise from WSI.</li> </ul>
<b>Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Heritage NSW</b>	<p>Heritage NSW provided the following comments and recommendations:</p> <ul style="list-style-type: none"> <li>although not specified in the Master Plan Requirements a heritage interpretation strategy should have been required and should reference the "Connecting to Country Framework Report" by Yerrabingin (June 2024).</li> <li>the assessment identifies that no Aboriginal objects will be impacted by Stage 1 (substation works), but several stone artefact sites will be affected by Stage 2 (enterprise and light industry works) requiring an Aboriginal heritage impact permit (AHIP) process to be undertaken prior to works.</li> <li>Badgerys Creek and South Creek, and the Aboriginal objects along these creeks, are recognized for their high cultural significance. Heritage NSW supports preserving the riparian corridors along these waterways, as reflected in the master plan.</li> <li>the report should clarify the assessment and mapping of potential culturally modified trees, as Heritage NSW does not support any impacts to these trees.</li> <li>future planning should include strategies for managing Aboriginal cultural heritage and minimizing impacts on sites within the riparian corridors.</li> <li>the master plan does not impact items listed on the State Heritage Register or historical archaeology based on Heritage NSW's review.</li> </ul>
<b>DCCEEW– Conservation Programs, Heritage and Regulation (CPHR)</b>	<p>CPHR provided the following comments and recommendations:</p> <ul style="list-style-type: none"> <li>the IPG code may allow development that could significantly alter flood behaviour in flood-prone areas.</li> <li>further flood modelling, assessment and event mapping is required.</li> </ul>

### 5.3.3 Summary of Council's submission

The master plan is located in the Liverpool LGA. Council was represented on the TAP for the master plan.

A summary of the issues raised by Council is provided in **Table 8** and a link to all submissions in full is provided in **Appendix B**.

**Table 8 | Summary of issues raised by Council**

Council	Submission summary
<b>Liverpool City Council</b>	<p><b>Road and riparian area design</b></p> <ul style="list-style-type: none"> <li>retaining walls near riparian areas, future local road reserves and public land should be replaced with natural transitions such as landscaped batters.</li> </ul> <p><b>Transport and accessibility</b></p> <ul style="list-style-type: none"> <li>road network upgrades are essential, particularly Badgerys Creek Road, to meet compliance with the precinct plan with safe multimodal access provide before any development approvals.</li> </ul> <p><b>Utility and infrastructure availability</b></p> <ul style="list-style-type: none"> <li>complying development should not proceed until essential infrastructure such as road networks, pedestrian access, public transport, and sewer services are in place.</li> <li>negotiation of a voluntary planning agreement is required.</li> </ul> <p><b>Compliance with planning guidelines</b></p> <ul style="list-style-type: none"> <li>proposed variations to precinct plan, DCP and design and infrastructure benchmarks should be reconsidered.</li> </ul> <p><b>Environmental and stormwater management</b></p> <ul style="list-style-type: none"> <li>stormwater basins appear over-engineered and naturalised watercourses should be considered instead of retaining walls.</li> <li>the Wianamatta-South Creek corridor should remain in private ownership until Stage 6, at which point land acquisition for stormwater infrastructure should be negotiated with Sydney Water.</li> <li>on-site stormwater detention is preferred.</li> </ul> <p><b>Traffic and transport considerations</b></p> <ul style="list-style-type: none"> <li>the master plan does not fully address public transport, pedestrian safety, and traffic impacts from industrial and commercial developments.</li> <li>the safety of designs for road reserve widths, active transport links, and heavy vehicle movements should be reconsidered.</li> </ul> <p><b>Landscaping and tree canopy targets</b></p> <ul style="list-style-type: none"> <li>the 50%-52% tree canopy target, tree species selection and landscape setbacks must be clarified and enforced to ensure compliance with environmental guidelines.</li> </ul> <p><b>Height and massing of buildings</b></p> <ul style="list-style-type: none"> <li>further justification is required for the proposed high bay warehouse heights (up to 52.5 meters).</li> <li>better integration is required of landscape setbacks to manage density impacts.</li> </ul> <p><b>Design and development quality</b></p> <ul style="list-style-type: none"> <li>the design quality strategy is overly qualitative and lacks tangible controls for assessment.</li> </ul>



Council	Submission summary
	<ul style="list-style-type: none"> <li>The design review process requires further clarification.</li> </ul> <p><b>Public art</b></p> <ul style="list-style-type: none"> <li>public art must be managed through a concept development application to ensure appropriate scale and integration.</li> </ul> <p><b>Noise, air quality, and traffic assessments</b></p> <ul style="list-style-type: none"> <li>further assessments are requested to address noise, vibration, and air quality impacts.</li> <li>trip generation rate assumptions have been underestimated.</li> </ul> <p><b>Subdivision and retaining walls</b></p> <ul style="list-style-type: none"> <li>consideration should be given to implementing a community title subdivision to manage safety and liability of retaining walls near regional basins.</li> </ul> <p><b>Exempt development</b></p> <ul style="list-style-type: none"> <li>provisions from the Codes SEPP, rather than the Transport and Infrastructure SEPP, are more appropriate to regulate private development in terms of exempt development.</li> <li>should be prohibited within local road reserves.</li> <li>first use and change of use should be complying development to ensure that acoustic amenity is maintained.</li> <li>demolition should be complying development under the Codes SEPP.</li> <li>fences and gates should not be exempt development for crime prevention through environmental design and street activation reasons.</li> <li>exempt development should be subject to a requirement not to reduce landscaping or deep soil provisions.</li> </ul> <p><b>SEPP mapping amendments</b></p> <ul style="list-style-type: none"> <li>the land reservation acquisition map should incorporate sufficient area for the provision of regional basins to ensure that these are established through the use of appropriate batters.</li> </ul>

### 5.3.4 Summary of public submissions

The Department received 7 submissions during the public exhibition period of the master plan (2 submissions from organisations and special interest groups and 5 submissions from individuals). 4 submissions objected to the project, 1 submission supported the project and 2 provided comment. A link to all submissions in full is provided in **Appendix B**.

The key issues raised by the public relate to property acquisition, economic and employment issues and open space and are set out in **Table 9**Error! Reference source not found..

**Table 99 | Key issues raised in public submissions on the master plan**

Issue		% of Submissions
Property acquisition	Concerns relating to impacts of road realignment and increased property acquisitions.	57.14% (4)

Issue		% of Submissions
Economic and employment issues	Issues raised relating to the impact of fees and taxes on business, calculation of employment figures, positive economic benefits of the proposal.	57.14% (4)
Open space	Concerns raised about insufficient open space.	14.29% (1)

## 5.4 Response to submissions

Following the public exhibition period, the Department requested the proponent respond to the issues raised in submissions and the advice received from government agencies. The Department also requested that the proponent provide additional information on infrastructure coordination, heritage, flooding, protection of aquatic habitat and riparian zones, hazardous development, as well as various components of the complying development code and proposed exempt development amendments to the Western Parkland City SEPP.

The proponent's response to submissions (RtS) provided additional information and clarification in response to the issues raised in submissions and requested by the Department. An amended master plan package was provided, which included updates to the master plan and the accompanying technical reports.

The Department sought further review of the updated master plan package from government agencies where key issues had been previously raised. A request for further information was subsequently issued to the proponent, with its final response addressing outstanding issues.

## 5.5 Key post-exhibition changes

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

The key elements that were revised are set out in Table 10.

**Table 10** | Key post-exhibition changes to the master plan and precinct plan amendments

Element	Description
<b><u>Master plan</u></b>	
<b>General amendments</b>	Edits and clarifications and additional controls.
<b>Basin reconfigurations</b>	Consolidation of basins along the Wianamatta-South Creek corridor

Element	Description
<b>Road reclassification</b>	Reclassification of Road 07 from a local road to a collector road.
<b>Retaining walls</b>	Amendments to retaining walls and removal of retaining walls fronting basins and road 07.
<b>Earthworks</b>	Amendment to bulk earthworks across the site to create a balanced outcome and reduce cut.
<b>Deep soil requirements</b>	Reconfiguration of deep soil provisions to meet the DCP minimum deep soil and tree canopy cover targets.
<b>Complying development</b>	Streamlining the complying development framework to provide greater integration with the master plan controls and design quality strategy.
<b>Exempt development</b>	Removal of a number of proposed exempt development types that are already available under the Codes SEPP or are better suited for inclusion into the IPG code.
<b>Public art strategy</b>	Update of the Public Art Strategy to ensure the proposed artwork locations are to be lodged as part of a concept development application.
<b>Existing native vegetation (ENV)</b>	Clarifications and additional protections added to the master plan to ensure that development on the site meets the requirements of the biodiversity certification order under the Growth Centres SEPP.
<b>Design quality strategy</b>	Changes made to improve design quality considerations and design review requirements.

#### **Precinct plan amendments**

<b>Update to Figures</b>	Changes made to reflect a minor change made to the street hierarchy, total water cycle management plan, blue green infrastructure framework, amendment to design competition figure and final locations of regional stormwater infrastructure.
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Following the Department's assessment of the application and consideration of the proponent's response to submissions and response to the Department's request for further information, the Department is satisfied that key assessment issues have been satisfactorily resolved; these are discussed in Section 6 of this report.

# 6 Assessment

The Department has considered the master plan, the issues raised in submissions, as well as the proponent's RtS and additional information in its assessment of the master plan. The Department considers the key issues associated with the master plan to be:

- design quality
- height of buildings
- complying development
- precinct plan amendments
- DCP variations, and
- Western Parkland City SEPP amendments:
  - exempt development
  - land reservation acquisition map
  - transport corridors map
  - land zoning map.

## 6.1 Design quality

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

The master plan proposes site-specific design quality provisions within the design quality strategy (DQS) that identify objectives and principles to be met for different design elements in demonstrating design quality. It is proposed that the DQS would satisfy section 4.30(2) of the SEPP in that it adequately provides for the assessment of design quality on the site. The DQS is to be considered for all development within the IPG site. Complying development applications for new buildings will require verification from a registered architect that the design of the development complies with the DQS.

### Submissions

Council commented that the DQS was complex to navigate from an assessment perspective, given the lack of numerical controls and relationship between the strategy, the master plan and the DCP. Comments were also provided relating to inconsistencies in the review process, concerns with the

selection process for the design review panels and limitations of the design verification checklist for complying development certificates.

The Government Architect NSW (GANSW) provided advice to the proponent on the need for clarity around the DQS considerations and ensuring that the design review process for each development pathway (DA or complying development) was clear and unambiguous for future users and consent authorities.

### **Response to Submissions**

In response, the proponent made changes to its DQS including clarifying and further detailing the design review process and development pathways. The design review hierarchy was refined in collaboration with the GANSW as follows:

#### Industrial development less than 10,000m<sup>2</sup>

A registered architect must design the building in accordance with the DQS and complete the design verification checklist.

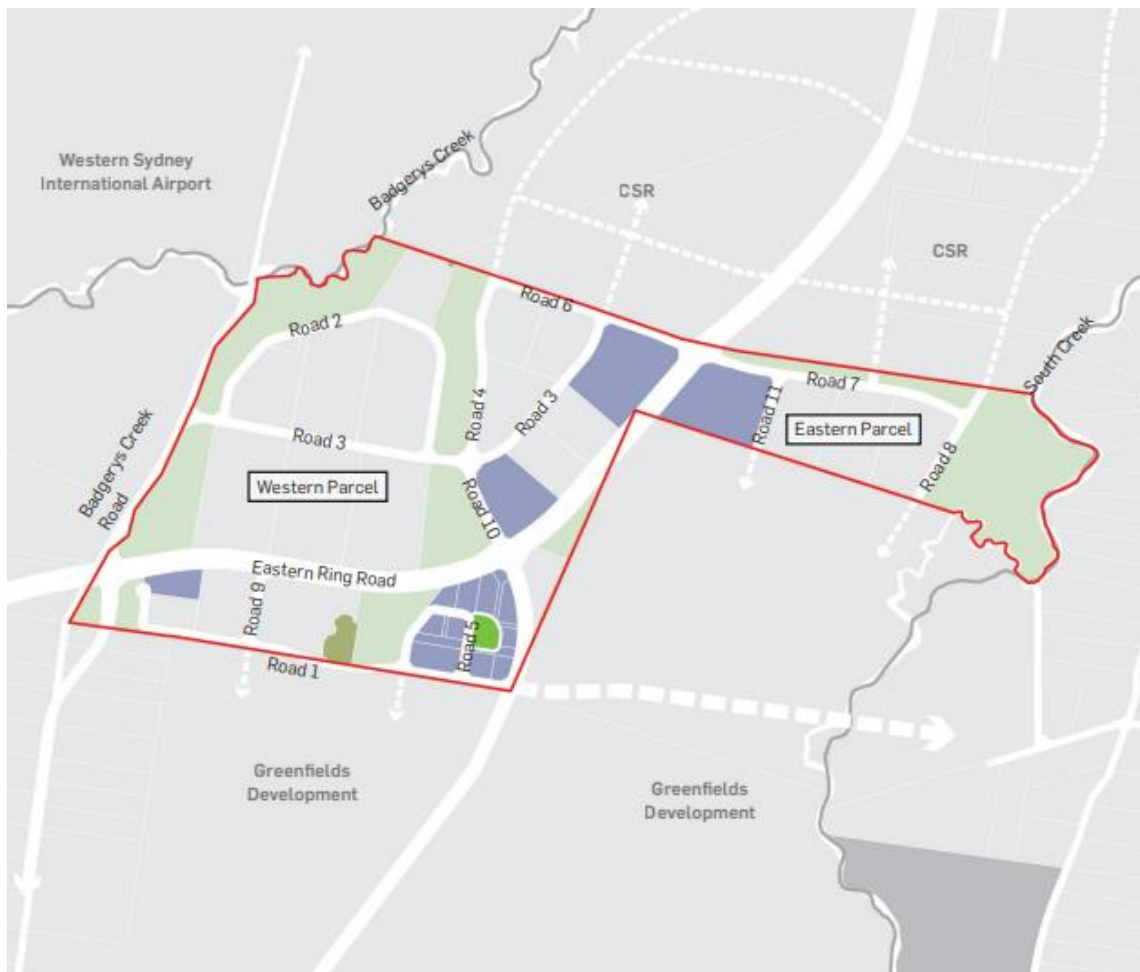
#### Industrial development over 10,000m<sup>2</sup>

A registered architect must design the building in accordance with the DQS and complete the design verification checklist, with a different and independent registered architect to peer review the design and verify that the building satisfies the DQS.

#### Landmark Sites

Landmark sites are mapped in the master plan and include all commercial buildings within the local centre and specific, prominent enterprise sites (Figure 9 | Landmark sites (shaded in blue) (Source: Urbis)Figure 9).

A registered architect must design the building in accordance with the DQS and complete the design verification checklist, with IPG's independent design review panel to verify that the building satisfies the DQS. The design review panel is to include a landscape architect.



**Figure 9 |** Landmark sites (shaded in blue) (Source: Urbis)

### Department's consideration

The Department considers that the proposed DQS, as amended, provides a rational approach for consideration of design quality and sets out clear criteria for buildings subject to a review.

The Department worked with the proponent to ensure that the DQS incorporated the recommendations of GANSW where reasonable and notes that GANSW supported the final design quality review structure. The Department is satisfied that the DQS provides clear and unambiguous approach for registered architects to follow in designing buildings for the site and that the design quality strategy adequately integrates with the IPG code, and the site-specific controls set out in the master plan, including designing with Country principles.

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

In addition to the DQS, the master plan contains development controls for built form and building design, the street network, the public domain and public open space ensuring an integrated design approach.



## 6.2 Height of buildings

The precinct plan currently sets a 24m maximum height limit for enterprise and light industry land uses and a 52.5m maximum height limit for business and enterprise uses. Notwithstanding these controls, the Western Parkland City SEPP obstacle limitation surface (OLS) map establishes limits within which all buildings and structures must be contained.

To accommodate potential high-bay warehousing, the master plan proposes to introduce flexible building height provisions with a maximum height of 52.5m across two areas mapped for enterprise and light industry on the site. These areas include the western parcel in the west and central area and the eastern parcel along the site's panhandle (areas denoted in yellow in Figure 6 above).

High-bay warehouses are storage facilities designed to maximise vertical space through tall racking systems. As the proposal would be inconsistent with the precinct plan, an amendment to the precinct plan's height of buildings figure is proposed, Refer to **Appendix E** for detailed assessment.

### Submissions

Western Sydney Airport (WSI) noted that while the proposed heights remain below the OLS, rooftop equipment and construction cranes may exceed maximum limits, requiring a Controlled Activity application and Commonwealth approval. Compliance with future PANS-OPS restrictions would also be necessary, and any development consent would require support from WSI, under the Western Parkland City SEPP.

The Bradfield Development Authority (BDA) supported the proposed amendment to the maximum building height limit.

Council requested justification for the 52.5m high-bay warehouse height limit, as it exceeds typical examples and lacked clear planning rationale. It also noted height measurements must be from natural ground level, and inconsistencies in designated high-bay areas should be addressed or justified with technical studies. Additionally, it recommended landscape setbacks to enhance site amenity and mitigate density impacts.

The Department requested the proponent to provide additional examples of high-bay warehousing and references in the master plan be amended to accurately show parcels of land that are relevant to the height control.

### Response to submissions

The proponent noted the comments provided by WSI and has incorporated into the IPG code (see Section 6.3) the requirement to refer any future applications for buildings and use of cranes likely to breach the OLS. Additional planning justification and confirmation that the building heights are to be measured from natural ground level was also provided.

### Department's consideration

The Department considers the proposed height amendments will provide the necessary flexibility to cater to emerging industries while remaining within the broader planning framework. The amendments align with the overall goals of the Western Sydney Aerotropolis Plan, the relevant objectives of the precinct plan and the airport safeguarding requirements within the Western Parkland City SEPP.

The Department is satisfied that Council's concerns have been adequately addressed, and the proponent has demonstrated a clear planning rationale through the provision of additional information. The Department concludes that the amendments to the building height figure in the precinct plan are acceptable, constitute an improved planning outcome and are reflective of the site-specific controls set out in the master plan and the IPG code.

### 6.3 Complying development

The exhibited master plan proposes a number of complying development types subject to development standards set out in the site-specific complying development code (IPG code). The IPG code is generally based on the complying development provisions set out in the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP) and the State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP).

However, its scope extends further than the range and scale of complying development under the Codes SEPP and covers most development envisaged for the site including buildings up to 100,000m<sup>2</sup> GFA, industrial lot subdivision, local roads and stormwater infrastructure and public domain and landscaping development.

The IPG code also relies on verifications from suitably qualified professionals to satisfy the certifier that certain development standards can be met, such as design quality, or the achievement of requirements for minor works on bushfire or flood prone land.

Through the TAP process, the scope of the IPG code was discussed and refined and was found to be generally suitable for lodgement, subject to satisfaction of a number of conditions and review and assessment by the Department.

Under the Western Parkland City SEPP applications for complying development certificates must include an Aerotropolis certificate from the Department which verifies that the development is consistent with the master plan.

#### Submissions

Sydney Water advised that each complying development must be able to demonstrate compliance with the waterway health targets either by connection to the regional stormwater scheme (when available) or through interim on lot measures.

TfNSW advised that the proponent should amend the IPG code to ensure that essential road infrastructure is available when needed and, although transport network capacity is sufficient for a gross floor area of 507,000m<sup>2</sup>, an updated TMAP must be submitted for review before development exceeds 407,920m<sup>2</sup>.

Council requested a number of amendments to the IPG code to improve legibility, provide consistency with the Aerotropolis planning framework, ensure development standards are measurable, improve integration with the master plan and the DQS, ensure consistency with the Codes SEPP and provide public art in accordance with the public art concept development application lodged with Council. Recommendations were also made to improve the IPG code conditions and ensure bonds were calculated in accordance with Council's fees and charges.

CPHR raised concerns that technical studies did not provide an adequate level of assessment to support the proposed complying development. CPHR required further information to demonstrate that land mapped as high biodiversity value existing native vegetation (ENV) would be adequately protected and managed, that water quality standards could be met, and that flood hazard had been appropriately documented and addressed.

The Department recommended amendments to improve legibility and ensure appropriate requirements, definitions, standards and conditions were included. It also requested amendments to provide clarity around the interaction between the DQS and the IPG code and to improve controls in relation to bushfire protection, storage of dangerous goods, availability of public utility infrastructure and compliance with the Noise Policy for Industry. It also requested that a number of development types, originally proposed as exempt development, be incorporated into the IPG code instead.

## **Response to Submissions**

The proposed IPG code has been amended to address government agency, Council and the Department's issues, including improved development standards and conditions, inclusion of public art requirements, updated flood data in the Integrated Water Cycle Management Plan and more effective integration with the DQS and master plan to deliver a cohesive and legible document.

The proponent has addressed concerns raised by CPHR by providing additional information, clarifications and amendments to the master plan. The response to each matter is set out below:

### Biodiversity

The master plan has been amended to show that areas of mapped ENV will be contained within open space lots rather than development lots and subject to protection under a vegetation management plan. The IPG code excludes development from areas of mapped ENV.

### Flooding

The proponent has provided additional flood assessment to demonstrate that no built form or building works are proposed within flood-prone land. Minor works proposed to be permitted as complying development within flood prone land, including walking paths, local roads, local stormwater works and landscape and public domain works will be subject to updated modelling to reflect the detailed design associated with each proposal and a summary report and statement from a professional engineer will be provided to the certifier, verifying that the proposal is consistent with the approved master plan and is compliant with the performance outcomes in the DCP.

### Water quality

Throughout the TAP process and assessment stage the proponent has been working with Sydney Water to refine the stormwater management for the site to ensure it meets all targets for water quality and quantity. Prior to the issue of a complying development certificate for stormwater works under the IPG code verification from a Sydney Water-approved engineer will be required stating that works have been designed in accordance with the development standards set out in the IPG code which reference the stormwater controls in the DCP and Technical Guidance for Achieving Wianamatta-South Creek Stormwater Management Targets.

The final IPG code is proposed to apply to:

- first use and change of use of premises
- new buildings and additions
- awnings and canopies
- subdivision and bulk earthworks
- retaining walls
- public domain and landscaping
- artwork and sculptures
- local roads and road infrastructure
- lighting
- local stormwater works
- subdivision and amalgamation
- tree and vegetation management
- temporary public roads, construction and haul roads and ancillary works, and
- signage.

### **Department's consideration**

The master plan proposes complying development provisions for a range of development types to enable development to proceed in a streamlined manner from bulk earthworks, road creation and subdivision stages to building design, construction and operation stages. Change of use, building alterations and additions provisions will enable development on the site to adapt over time.

These provisions are in addition to complying development provisions of the Codes SEPP, which apply generally to the Western Sydney Aerotropolis. In relation to CPHR concerns:

#### Biodiversity:

The Department is satisfied that the updated master plan and IPG code provides sufficient protections to ensure that mapped ENV land will be adequately protected and managed. Further assessment of biodiversity issues is provided in **Table 11**.

#### Flooding

The Department is satisfied that the minor works complying development proposed in flood-prone land are of limited extent, will not impact the flooding regime or increase flood hazard and will be in accordance with exhibited flood modelling.

#### Water Quality

The Department is satisfied that stormwater works will be designed in accordance with relevant technical water quality guidelines.

#### Conclusion

The Department has given consideration to strategic level assessment of the site and is satisfied that the scope and scale of the IPG code is appropriate for the site's size, location and intended land use, that airport safety will be maintained, design quality for new buildings will be verified, at a minimum, by a registered architect, no significant biodiversity, water quality, flooding, contamination or heritage impacts will result and that conditions included in the IPG code will manage residual impacts.

The Department considers the IPG code will provide an important and effective streamlined planning pathway for development of the site. The Department is satisfied the IPG code is consistent with Section 4.41 of the Western Parkland City SEPP, in that it specifies the development that may be carried out as complying development within the enterprise zone, it contains development controls for the complying development, and it has been prepared in accordance with the master plan requirements.

Additionally, the IPG code is consistent with the requirements for complying development under a master plan set out in Section 4.43 of the Western Parkland City SEPP as the complying development:

- is specified in the master plan

- will be consistent with the master plan
- is required to meet the Building Code of Australia
- cannot be carried out on land with heritage items or Aboriginal objects, heritage conservation areas or places of Aboriginal heritage significance, and
- will not be for the purpose of remediation work.

## 6.4 Precinct plan amendments

The master plan guidelines state that master plans provide a mechanism to amend the precinct plan to achieve a superior planning outcome while remaining generally consistent with the principles of the Aerotropolis planning framework.

The master plan proposes amendments to figures in the precinct plan to reflect the design of the master plan. It also proposes a limited number of mapping changes outside the site boundary to enable safer and more efficient transport outcomes.

The figures proposed to be amended include:

- Figure 3 – Land use and structure plan
- Figure 5 – Blue-green infrastructure framework
- Figure 6 – Total water cycle management
- Figure 8 – Transport network
- Figure 9 – Active transport network
- Figure 10 – Street hierarchy
- Figure 11 – Centres hierarchy
- Figure 12 – Height of buildings
- Figure 13 – Floor space ratio, and
- Figure 14 – Design competitions.

The proposed amendments were the subject of TAP consideration. The TAP letter of advice noted that the changes to the precinct plan will allow for an enhanced traffic network and lot layout for employment land uses, and improved opportunity for stormwater quality and management. These changes were designed in collaboration with adjoining landowners GDC and CSR, where relevant, and endorsed by the TAP in November 2023.



### Department's consideration

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

## 6.5 Variations to DCP controls

The Western Sydney Aerotropolis DCP applies to development within the IPG site. The master plan proposes:

- alternative benchmark solutions to those set out in the DCP, and
- additional development controls specifically designed for the IPG site.

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

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

The proposed DCP alternative solutions and additional controls were the subject of TAP consideration. The TAP letter of advice noted the variations to the DCP are required to assist the land use outcomes for the delivery of employment lands on the site.

### Department's consideration

In its assessment of the proposed amendments, the Department has considered all submissions, the proponent's RtS and the relevant objectives and performance outcomes of the DCP. Overall, the Department is satisfied that the proposed alternative benchmark solutions and additional controls are appropriate to guide development and are generally consistent with the relevant objectives and performance outcomes of the DCP. Detailed assessment of the alternative solutions and issues raised in submissions is provided in **Appendix F** and **Table 11**.

## 6.6 Western Parkland City SEPP amendments

The master plan guidelines state that master plans may propose a concurrent amendment to Western Parkland City SEPP.

### 6.6.1 Exempt development

The exhibited proposal included amending Chapter 4 of the Western Parkland City SEPP to include site-specific exempt development provisions to facilitate low-impact development relating to commercial and enterprise development on the site.

The Western Parkland City SEPP currently excludes the operation of some exempt development in the Aerotropolis. The proposed exempt provisions are based on existing provisions within the Codes SEPP and T&I SEPP that do not currently apply to the site or have been amended for development specific to the master plan site.

#### Submissions

Council requested a number of amendments to the exempt development, including the removal of T&I SEPP provisions. In addition, it was requested that the change of use provisions be subject to the IPG Code (as complying development) rather than exempt development so that development can be subject to air quality and noise controls.

Further amendments requested included excluding demolition, gates and fences over 5m in height and any structures or paving that decreases deep soil and landscape areas on site.

CPHR raised the same concerns in relation to exempt development as it raised in relation to complying development including that inadequate information had been provided in relation to biodiversity, water quality and flooding to demonstrate that exempt development would have a low impact.

#### Response to submissions

In its RtS, the proponent advised that the change of use and first use provisions have been removed from the exempt development provisions and moved to the IPG code. In addition, the master plan was also updated to provide deep soil provisions, guiding landscaping and perviousness targets for development. Further technical detail was provided to address concerns raised by CPHR on water quality and flooding and additional protections were provided to high biodiversity value areas, as set out above in the complying development section.

The final exempt development types include:

- emergency works
- flagpoles

- geotechnical investigations
- maintenance and repair
- pedestrian ramps, paths and mechanical and non-mechanical stairways
- preloading works
- scaffolding
- security and monitoring cameras and other devices
- switch rooms and security booths
- minor vegetation management
- wash bays, and
- above ground water tanks.

### Department's consideration

The Department reviewed the Codes and T&I SEPPs and assessed whether the proposed exempt provisions were relevant for the development envisaged for the site and would result in very low impacts.

The Department's analysis is that, in most instances, the proposed provisions, with some minor amendments, are suitable for the site.

The Department recommended to the proponent that:

- a number of the proposed provisions would be more suitable for inclusion in the IPG code to ensure appropriate development controls could be applied, such as signage, gates and fences and movable plant and equipment
- amendment was not necessary in some instances as suitable provisions already applied to the site under the Codes SEPP, such as demolition, and
- certain proposed exempt development types be restricted from landscaped areas, such as wash bays and above ground water tanks, to ensure that deep soil areas are not compromised over time.

The proponent accepted the recommendations, and the provisions were amended accordingly. The Department is satisfied that the amendments and further information provided has addressed the comments from Council and CPHR.

The Department is satisfied the proposed exempt development provisions and amendments to Chapter 4 of the Western Parkland City SEPP are appropriate in establishing site-specific streamlined planning pathway for low-scale, low-impact development necessary to facilitate the future uses within the master plan site and that exempt development will be subject to standard

general requirements to ensure it is low impact, including excluding exempt development from environmentally sensitive areas, areas of heritage significance and requiring compliance with the BCA. See Appendix D and Table 11 for a detailed assessment of the proposed exempt development and issues raised.

## 6.6.2 Land reservation acquisition map

The proposal includes changes to the location and extent of land for stormwater infrastructure under the master plan. Amendments to the land reservation acquisition (LRA) map are accordingly being sought to reflect those changes. The proponent proposed that Sydney Water acquire most riparian corridor land on the site, as it served a drainage and water quality function, see Figure 10.

### Submissions

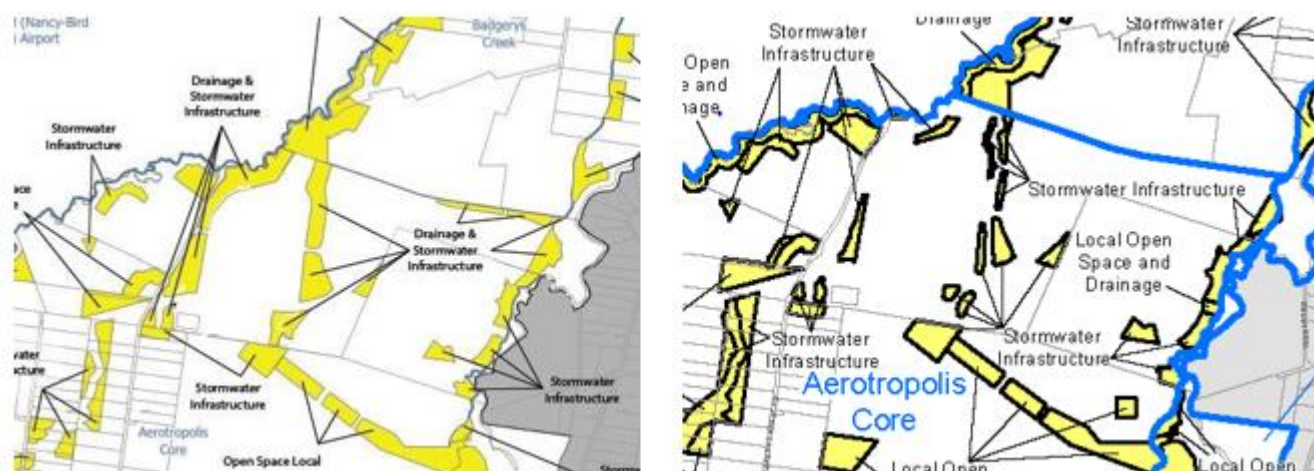
Sydney Water, as the acquisition authority, advised that it did not agree to the scope of land proposed to be reserved for acquisition, noting it would only acquire the land necessary for its stormwater basins and not any additional riparian corridor land.

Council did not object to changes to the LRA map but requested that regional basin design include sufficient area for batters, rather than retaining walls and if retaining walls were required, ensure they did not intrude into future proposed local road reserves. It also noted that it would not acquire any land on the site for open space or drainage, consistent with the current LRA map.

### Response to submissions

The proponent responded that it designed the basins in accordance with Sydney Water guidelines and that discussions with Sydney Water to minimise the need for retaining walls are ongoing.

The proponent clarified that no retaining walls were proposed within local road reserves and agreed to annotate the master plan in this respect, satisfying Council's concerns.



**Figure 10 | IPG proposed LRA map amendment (left), and Sydney Water proposed (right) Source: Urbis and DPHI**

## Department's consideration

The Department discussed the required amendments to the LRA map with the proponent and Sydney Water. Sydney Water reiterated its advice that it will only acquire land for the footprint of its basins. It is noted that Sydney Water is currently exhibiting its proposed stormwater scheme for the Badgerys Creek area, which sets out this approach. In response the proponent reduced its proposed acquisition extent, to Sydney Water's satisfaction.

The Department recommends that the LRA map be amended to reflect the master plan design and the location of regional stormwater basins as sought by Sydney Water.

In making this recommendation, the Department notes that there are ongoing negotiations between IPG and relevant state agencies and Council in relation to long-term ownership and management of land within the riparian corridors, not reserved for regional stormwater basins.

### 6.6.3 Transport corridors map

Key roads affecting the site are proposed to be re-aligned in order to more closely align with property boundaries and enable better place, design and road safety outcomes. The replacement map shown in **Figure 11** reflects the updated alignments of those roads.

The key amendments include:

- realign the future Primary Arterial (Eastern Ring Road) and Fifteenth Avenue (Fifteenth Avenue and Bradfield Metro Link Road (BMLR)), to reflect the master plan design. This proposal has been undertaken in conjunction with CSR to the north and GDC to the south, and
- realign the intersection of Badgerys Creek Road and the Eastern Ring Road to improve intersection safety. This proposal has been led by Transport for NSW (TfNSW).

## Submissions

Council did not object but requested that Badgerys Creek Road be upgraded to the standards required under the precinct plan and DCP. It further noted that land owners affected by the corridor alignments should be notified.

Three public submissions raised concerns with the impact of the proposed re-alignments on adjoining properties and a perceived lack of consultation with adjoining land owners.

## Response to submissions

The proponent responded to the submissions by noting that engagement was completed to inform all surrounding land owners affected by the proposal, also that the re-alignment of the intersection of Badgerys Creek Road and the Eastern Ring Road was a TfNSW-led road safety initiative.

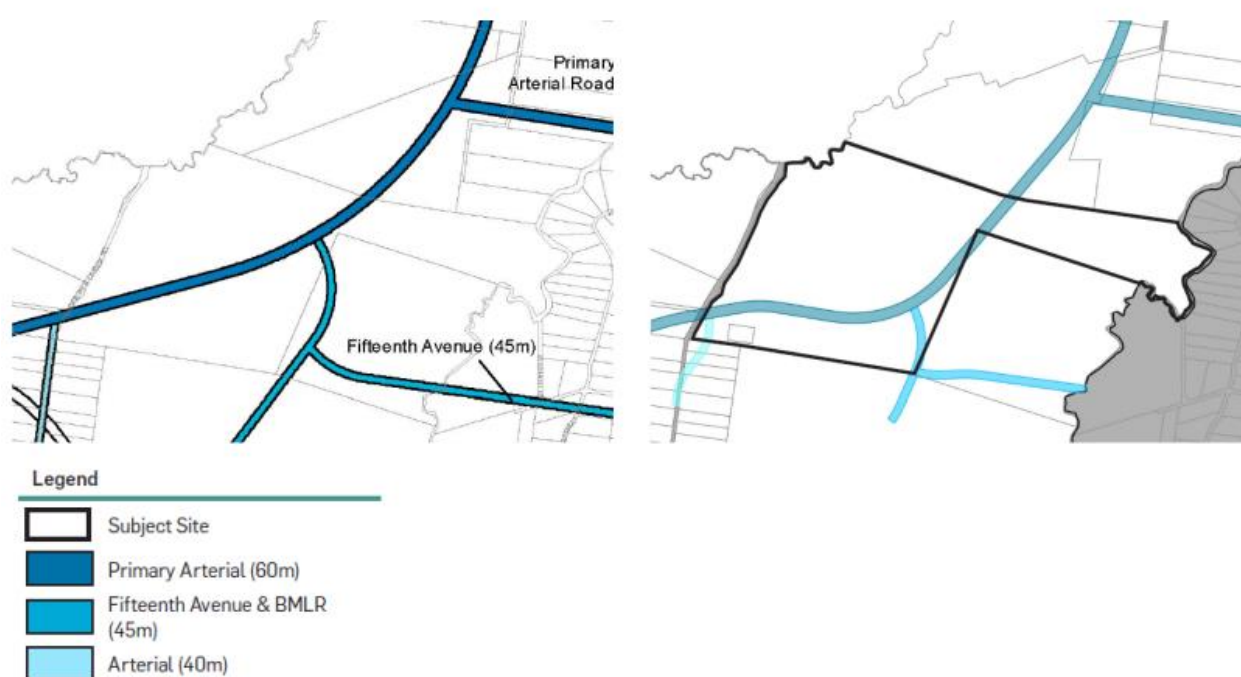
## Department's consideration

The Department is satisfied that the proposed realignment of the Eastern Ring Road, developed in collaboration with adjoining landowners CSR and GDC, ensures more efficient road connections and lot configurations and maximises land use across the site by increasing employment floorspace in a strategic location, consistent with the Western Sydney Aerotropolis Plan. Additionally, the TfNSW-led re-alignment to the intersection of Badgerys Creek Road and the planned Eastern Ring Road will improve road safety.

The master plan was exhibited by the Department for 28 days between 15 November to 13 December 2024. Notifications were provided to adjoining landowners, with those likely to be affected by any future road realignments provided with a TfNSW fact sheet outlining the proposal and how to give feedback.

The master plan package was accompanied by an EIE which provided details and mapping of the proposed amendments to the Western Parkland City SEPP transport corridors map.

The Department is satisfied that reasonable consultation was undertaken, with the master plan exhibited in accordance with the Western Parkland City SEPP and the EIE exhibited in accordance with the *Environmental Planning and Assessment Act 1979*.



**Figure 11** | Existing transport corridors map (left) and proposed transport corridors map (right) Source: Urbis and DPHI

The Department notes that the 3 properties in question along Badgerys Creek Road were already subject to partial acquisition by TfNSW for future widening of Badgerys Creek Road. The current proposal would increase the extent of acquisition necessary for these properties, subject to detailed



planning. The Department acknowledges that TfNSW will be undertaking further engagement with landowners over the coming months to advance its planning and design. Required property acquisitions will follow standard TfNSW processes and timing.

#### 6.6.4 Land zoning map

A substation has been approved on lot 99 DP1287207 within the IPG site. A minor adjustment to the land zoning map is proposed to designate this use as SP2 Infrastructure in this location.

The existing and proposed land zoning map are shown in Figure 4. No objections were raised for amendment to the land zoning map.

The minor amendment reflects the approved use of the land, will facilitate the orderly development of the area and is supported by Endeavour Energy.

### 6.7 Other issues

The Department's consideration of other issues raised in submissions is summarised in Table 11.

**Table 11** | Assessment of other issues

Issue	Findings and conclusions
Bushfire protection	<p>A bushfire assessment report accompanied and informed the master plan. The report considered the suitability of the master plan with respect to bushfire risk and the requirements of Planning for Bush Fire Protection 2019 (PBP).</p> <p>NSW Rural Fire Service advised future development within the master plan must comply with the requirements of PBP. It noted that the enterprise zoning allows education and creative industries which may fall under special fire protection purpose (SFPP) developments identified under the <i>Rural Fires Act 1997</i>.</p> <p>The bushfire assessment report indicates that all proposed lots are capable of meeting a minimum standard of BAL-29 construction and asset protection zones (APZs) are achievable within the master plan's developable area or within planned managed open space areas.</p> <p>The Department required SFPP development be excluded from the IPG code.</p> <p>The Department is satisfied that the bushfire assessment report has adequately considered the potential bushfire impacts and that future development will be able to demonstrate compliance with PBP whether a DA or complying development pathway is followed.</p>
Tree canopy cover targets and deep soil	<p>The master plan seeks to adopt alternative benchmark solutions in relation to tree canopy and deep soil targets specified in the DCP.</p>

Issue	Findings and conclusions
	<p>Council did not support the proposed alternative benchmark solution allowing development with less than 15% deep soil zone for the site able to use permeable pavers to make up for the shortfall to achieve the minimum required pervious area. Council also did not support the alternative benchmark solution which specifies that 'Tree species selection within the Badgerys Creek Road Master Plan must ensure tree heights are no greater than the permissible height of buildings and must be guided by wildlife risk mitigation measures.</p> <p>Clarification was requested on how a 50%-52% tree canopy target would be achieved for the riparian corridor, and concerns were raised regarding tree species selection.</p> <p>The Department requested deep soil zones be provided at least in accordance with the existing DCP and that the overall tree canopy cover target for the entire master plan area be specified. In its RtS the proponent noted that the master plan layout and indicative building footprints have been revised to enable achievement of DCP deep soil targets of 15% for industrial lots, 50% for streetscapes and road corridors, and 30% for on-lot development within the local centre.</p> <p>The requirement to ensure tree heights remain below maximum building height limits has been removed. The master plan was amended to show that total tree canopy coverage achievable across the entire master plan is 29.49%.</p> <p>The Department is satisfied that the master plan provides for appropriate levels of deep soil across the site and that the total tree canopy coverage is satisfactory when the need to balance tree canopy with wildlife hazard/airport safety considerations are taken into account.</p>
Biodiversity	<p>The master plan was accompanied by a biodiversity assessment report (BAR) and biodiversity management plan. The BAR includes a biodiversity consistency report that assessed the proposal's consistency against the requirements of the biodiversity certification order under the Growth Centres SEPP.</p> <p>While the site is largely cleared and has been historically used for agricultural production there remain small areas of native vegetation on the site. The majority of the site is biodiversity certified, with a small area of non-certified land at the eastern extent of the panhandle adjacent to the Wianamatta South Creek Corridor.</p> <p>There are three areas within the site zoned environment and recreation (ENZ) (Figure 4), one along the northern boundary of the site, one on the southern boundary and another on the eastern edge of the panhandle. These areas are mapped under the Western Parkland City SEPP as High Biodiversity Value Area (existing native vegetation) (ENV) (labelled as HBV under the master plan) and are subject to the requirements of the biodiversity certification order under the Growth Centres SEPP.</p>

Issue	Findings and conclusions
	<p>CPHR noted that the Western Parkland City SEPP identifies 5.13 ha of mapped ENV/HBV on the site however, the master plan only proposed protecting 4.71 ha. CPHR also noted several development encroachments into mapped ENV/HBV. It provided recommendations that ENV/HBV areas:</p> <ul style="list-style-type: none"> <li>• should not be subdivided as proposed</li> <li>• be protected from direct and in-direct development impacts</li> <li>• be enhanced with re-vegetation where required</li> </ul> <p>The proponent responded by amending the master plan to the full 5.13-ha extent of ENV/HBV land by:</p> <ul style="list-style-type: none"> <li>• removing mapped ENV/HBV from developable lots and incorporating into open space lots</li> <li>• ensuring that exempt and complying development cannot occur in mapped ENV/HBV</li> <li>• clarifying that mapped ENV/HBV will be protected from impacts and managed under a vegetation management plan by IPG until a public authority is identified to acquire the land.</li> </ul> <p>The Department concludes that the master plan makes appropriate provision for the ongoing protection of the 5.13 ha of mapped ENV/HBV on the site consistent with the requirements of the biodiversity certification order under the Growth Centres SEPP.</p>
Riparian zones and fish habitat	<p>The master plan was accompanied by a riparian assessment report, biodiversity management plan and riparian corridor landscape drawings to address the three major watercourses adjacent to and within the site. The three major watercourses include Wianamatta South Creek to the east, Badgerys Creek to the west and the central riparian corridor which traverses the middle of the site. Wianamatta South Creek and Badgerys Creek are classified as key fish habitats.</p> <p>DPI Fisheries recommended that riparian buffer zone widths be implemented in accordance with DPIRD Fisheries Policy &amp; Guidelines and the Blue Green Strategy of the master plan should aim to include enhancement of in stream key fish habitat features, including native in-stream vegetation and snags. It noted the western most watercourse is a Class 3 fish habitat passage. Under the DPIRD Fisheries Policy &amp; Guidelines, this would require a buffer zone of 10m to 50m.</p> <p>The proponent noted that the master plan provides for a 30m vegetated buffer to satisfy the DCCEE Guidelines for Riparian Corridors on Waterfront Land and that this is adequate to protect the values of the fish habitat on site. The buffer zone will be restored in accordance with a Vegetation Management Plan which will lead to improved fish habitat protection over time. Additional controls were included in the master plan to ensure the enhancement of in-stream key habitat features and connectivity between ponds to promote continuous fish passage. CPHR supports the proposed revegetation along waterways as it will add to the precinct's positive biodiversity outcomes. CPHR also supports the recommendations in the vegetation management plan that revegetation is undertaken using species that would naturally occur within the riparian zone.</p>

Issue	Findings and conclusions
	<p>The Department is satisfied that appropriate consideration has been provided to rehabilitation of riparian corridors and enhancement of aquatic habitat and fish passage.</p>
Flooding	<p>the master plan was accompanied by an integrated water cycle management Plan (IWCMP) and flood modelling to provide a comprehensive flood assessment of the site. The IWCMP noted that all development lots are above both the 1%AEP +0.5m freeboard and 0.2%AEP flood levels, minor encroachment of floodwaters may occur in some isolated lots in the PMF event and there are negligible adverse impacts to upstream or downstream flood levels and properties due to the proposed development.</p> <p>CPHR requested the IWCMP Report be updated to include proposed changes to land use outside the urban development footprint, including detention basins and revegetation of the riparian corridor and to include updated flood impact and risk assessment in line with the DCP. It also raised concern that inadequate assessment has been undertaken of the proposal to allow complying development within flood prone land.</p> <p>The NSW SES provided recommendations relating to flooding and requested the proponent to address the principles outlined in the Support for Emergency Management Planning Guideline, Section 9.1 Ministerial Directions 4.1 – Flooding and consistency with the NSW Flood Prone Land Policy.</p> <p>The proponent in the response to submissions addressed the principles outlined in section 9.1 Ministerial Directions 4.1 - Flooding and consistency with the NSW Flood Prone Land Policy. The proponent noted that the master plan incorporates flood risk management by ensuring all development lots and roadways are elevated above peak PMF water levels. Driveway and basement access has been strategically planned to allow flood-free access to the local road network. Evacuation is the primary flood response, directing users west via Road 03 and the Eastern Ring Road towards elevated flood-free locations. While some roadways experience minor inundation during extreme storms, the hazard level remains low (H1 classification), with manageable flood depths.</p> <p>The proponent provided additional flood assessment to demonstrate that no built form or building works are proposed within flood prone land. Minor works proposed to be permitted as complying development within flood prone land include walking paths, local roads, local stormwater works, and landscape and public domain works which will be subject to engineer verification that the development is compatible with the flood hazard of the land and not likely to cause adverse off-site flood impacts. The Department is satisfied that these works under the IPG Code are of limited extent, will not impact the flooding regime and will be in accordance with exhibited flood modelling.</p> <p>The Department is satisfied that all development lots are above both the 1%AEP +0.5m freeboard and 0.2%AEP flood levels and that only minor encroachment of</p>

Issue	Findings and conclusions
	<p>floodwaters in some isolated lots may occur in the PMF event. The Department notes that any complying development certificate would be subject to updated modelling to reflect the detailed design associated with each proposal, a summary report and statement from a professional engineer that the proposal is consistent with the approved master plan and is compliant with the performance outcomes in the DCP.</p>
<b>Contamination</b>	<p>The master plan is supported by an environmental report and an asbestos management plan. the environmental report included a detailed site investigation (DSI) to assess the site for the presence of soil and/or groundwater contamination. The assessment concluded that the IPG site is suitable for the uses envisaged by the master plan, subject to implementation of the asbestos management plan.</p> <p>The EPA noted that the status of contamination at the IPG site was referred to as ‘contamination free’ and requested clarification to ensure asbestos is considered appropriately during future development works. As a result, the proponent amended the master plan to provide an additional control for the reuse, recycling and disposal of waste and management of contaminated and hazardous waste.</p> <p>The Department is satisfied that the site is, or can be made suitable for the land uses proposed within the master plan and notes that future development will be subject to separate approval processes which will further consider site suitability and ground conditions for specific developments and proposed land uses. For the purposes of complying development, the IPG code prevents complying development being carried out on significantly contaminated land or being for the purpose of remediation work. The IPG code includes a condition that should contamination unexpectedly be discovered the certifying authority is to stop works and notify Council and the EPA.</p>
<b>Air quality</b>	<p>The master plan was informed by an air quality impact assessment (AQIA) which considered the potential air quality impacts that may arise from development of the Ingham site. Recommendations from the AQIA were incorporated into the master plan, including a control requiring separation distances for certain development types to ensure there are no air quality impacts to existing sensitive receptors from development on the site.</p> <p>The EPA recommended that dust monitoring be undertaken at the site and that construction environmental management plans (CEMP) for future development consider implementing appropriate air quality control measures and monitoring. The proponent noted that the IPG code contains a specific condition that relates to providing a CEMP which can deal with air quality monitoring and management during that stage of development.</p> <p>The Department is satisfied that the air quality impact assessment has considered the likely air quality impacts of future development and suitable mitigation measures, and assessment requirements have been incorporated into the master plan.</p>

Issue	Findings and conclusions
Noise	<p>A noise planning assessment accompanied and informed the master plan. the report considered the suitability of the master plan with respect to potential noise impacts and provided relevant assessment procedures and design considerations to address noise issues that may impact surrounding residential receivers including road traffic and operational noise.</p> <p>The EPA provided recommendation that any future noise assessment for individual developments within the site must reference the noise limits within the Noise Assessment and prove compliance at the nearest receivers within the noise catchment areas.</p> <p>The master plan provides a control detailing noise assessment criteria that must be complied with for development applications and complying development applications. The control specifies design measures, noise modelling and assessment requirements for noise reports to be submitted with relevant applications.</p> <p>The Department is satisfied that the master plan has incorporated the recommendations of the noise planning assessment and the EPA, and that future development on the site will need to demonstrate compliance with the master plan noise control and the Noise Policy for Industry.</p>
Waste	<p>The master plan was accompanied by a sustainability strategy and ESD Report to detail the sustainability strategy for the management of waste materials on the site.</p> <p>The EPA provided recommendations regarding the re-use of fill on the site. The proponent provided a waste management plan and detailed site investigation confirming that the proposed material qualifies as virgin excavated natural material (VENM) and should be treated as such in future earthworks. A waste management control was added to the master plan for the reuse, recycling and disposal of waste and the management of contaminated and hazardous waste. The EPA provided recommendations to improve the proposed control, which the proponent accepted.</p> <p>The Department is satisfied that the master plan incorporates appropriate waste management measures including for the re-use of fill.</p>
Airport safeguarding	<p>The master plan was accompanied, and informed, by an aeronautical impact assessment which considers the technical and policy context for effective protection and safeguarding of airport operations and lists the key implications and recommendations for the master plan. The assessment informed the proposed increase in height provisions to 52.5m within the eastern and western parcels of the master plan to accommodate high-bay warehousing and included a review of the wind shear area in the western parcel, requiring consultation with the relevant Commonwealth department.</p>



Issue	Findings and conclusions
	<p>WSI provided detailed advice around airport safeguarding, particularly relating to windshear and turbulence, wildlife hazards, controlled activities and protected airspace and communication, navigation and surveillance facilities.</p> <p>The proponent noted that the design of the master plan and IPG code complied with all relevant airport safeguarding requirements under the Western Parkland City SEPP addressing controlled activities, building wind shear, lighting and wildlife hazards, noting in particular, that prior to any complying development certificate being issued any necessary Commonwealth approvals would first have to be issued.</p> <p>WSI provided a response to the Department on the proponent's RtS, stating it was satisfied that the master plan and IPG code met the airport safeguarding requirements set out under the Western Parkland City SEPP.</p> <p>The Department has considered the master plan, the proponent's RtS and the WSI's response and is satisfied that the master plan has adequately addressed Part 4.3 Development controls - airport safeguards of the Western Parkland City SEPP.</p>
Traffic impact assessment	<p>The master plan is supported by a TMAP and modelling assessment in consultation with TfNSW and the TAP. The TMAP notes that traffic modelling indicates that the road network can support the first 6 of the 7 stages of the site, which incorporates the full enterprise and light industry (warehousing and distribution centres) component of the master plan (507,050m<sup>2</sup> GFA) while demonstrating satisfactory intersection performance.</p> <p>TfNSW requires the TMAP be updated within 5 years of master plan approval, or when GFA exceeds 407,920m<sup>2</sup> to provide assurance that the underlying transport assumptions supporting the full enterprise and light industry GFA are still accurate. It also required a control to ensure that traffic modelling, in accordance with TfNSW guidelines, is undertaken for new development in the local centre (stage 7).</p> <p>The master plan provides that traffic impact of stage 7, the local centre, will be reassessed when the future Eastern Ring Road is completed, and the trip rates may be refined in collaboration with TfNSW and Council.</p> <p>The INSW Sector Plan currently projects that major new road infrastructure and upgrades affecting the site, including the Eastern Ring Road may not be undertaken until at least 2040.</p> <p>In its submission WSI raised a number of concerns relating to the adequacy of the traffic impact assessment, modelling and development staging and due to these factors, the traffic impact of the development may be more severe than estimated.</p>

Issue	Findings and conclusions
	<p>Council raised a number of concerns with the TMAP, particularly relating to trip generation, access arrangements, road network, planning agreements, construction traffic management plan (CTMP) framework, green travel plan framework, referral mechanisms and street lighting. it recommended that the proposed roundabout at the site entrance with Badgerys Creek Road should be in place before occupancy.</p> <p>The proponent provided a response noting that the background growth data that was included in the modelling was provided by TfNSW, which was reviewed to ascertain the traffic volume growth associated with the background developments within the Aerotropolis. The TMAP and modelling has also been previously considered by TfNSW and the TAP. The master plan and IPG code were amended to address Council's CTMP, green travel plan, referral and lighting concerns.</p> <p>The Department is satisfied that the traffic modelling and staging in the master plan aligns with TfNSW requirements and has received TfNSW endorsement through the TAP process. The Department notes that enabling road upgrades have already occurred at the intersection of Elizabeth Drive and Badgerys Creek Road. Additionally, the roundabout at the intersection of IPG site access and Badgerys Creek Road is undergoing an approval process with Council currently and TfNSW is expected to complete a safety upgrade of Badgerys Creek Road in 2025.</p> <p>The Department notes the current road network can support all enterprise development stages for the site, with the master plan requiring future modelling to demonstrate the future road network can support the final stage ahead of is development (circa 2040). The master plan sets out the traffic modelling requirements for this stage of development, whether through a complying development or DA pathway.</p>
Public utility infrastructure	<p>The master plan was accompanied by an Integrated water cycle management plan (IWCMP) and Infrastructure delivery strategy to provide detail on the delivery and timing of public utility infrastructure for the site.</p> <p>Sydney Water provided advice relating to the water, wastewater, recycled water and stormwater servicing for the site, noting that:</p> <ul style="list-style-type: none"> <li>the area will be rezoned to the Oran Park Water Supply Zone by 2025</li> <li>wastewater infrastructure is anticipated to be in place by 2026/27, with interim solutions under development, and</li> <li>recycled water system will be sourced from the Upper South Creek Advanced Water Recycling Centre, with plans for future connections and adjustments.</li> </ul> <p>Endeavour Energy provided its requirements to provide electricity to the site and for protection of its substation located on the site.</p>

Issue	Findings and conclusions
	<p>The proponent advised it is working with Sydney Water and Endeavour Energy to ensure water and sewerage, and power is in place and will be available when required.</p> <p>The Department notes that the proponent is working with Sydney Water on the design and development of an Interim Operating Procedure for sewage and that Endeavour Energy has a zone substation located within the site. The INSW sector plan also notes that adequate road and water infrastructure will be available to service the site. The Department is satisfied that the master plan addresses the public utility infrastructure provisions under the Western Parkland City SEPP for both development application and complying development pathways and that the site will be able to be serviced by water, sewerage and power when required.</p>
<b>Permeability and pedestrian access</b>	<p>The master plan includes a pedestrian and active transport network throughout the site, with the majority of the links traversing open space within the riparian corridors.</p> <p>Council raised concerns around safety risks for pedestrians and cyclists attempting travel to the site along Badgerys Creek Road from Bradfield City Centre until active transport links, to the standard set out in the precinct plan, are delivered.</p> <p>TfNSW recommended the road network plan include pedestrian access connections to all adjoining roads to ensure workers can easily access broader site facilities and that TfNSW be consulted during the site design phase to ensure that larger blocks with multiple street frontages provide pedestrian access to all streets for improved permeability.</p> <p>The proponent amended relevant master plan controls in line with the request from TfNSW, noting that the design and delivery of the upgrade of Badgerys Creek Road, and the integrated active transport pathways through to Bradfield City Centre, are subject to TfNSW funding, design and timing. The proponent agreed that it intended to provide safe pedestrian access through the site and to future bus stops on Badgerys Creek Road in line with master plan staging plan.</p> <p>The Department is satisfied that the master plan provides for appropriate active transport networks throughout site and to bus stops on Badgerys Creek Road and includes a requirement that TfNSW consultation is undertaken during detailed design phase to ensure site security and pedestrian safety is considered.</p>
<b>Travel plans</b>	<p>The master plan initially proposed that each development require approval of a Travel Plan by TfNSW and that TfNSW must approve the travel plan within 28 days.</p> <p>TfNSW objected to this requirement and suggested that an overarching travel demand management strategy (TDMS) be provided for its endorsement, whereby instead of all future individual travel plans requiring TfNSW approval the travel plans would only need the certifier to be satisfied that the travel plans were developed in accordance with the TDMS.</p>

Issue	Findings and conclusions
	<p>The proponent agreed to TfNSW's proposal and amended the master plan control accordingly.</p> <p>The Department is satisfied that this approach will assist in meeting State government goals of minimising reliance on private vehicle travel and promotion of sustainable transport options.</p>
Aboriginal cultural heritage	<p>The master plan was accompanied by an aboriginal cultural heritage assessment report (ACHAR) and archaeological test excavations. No impacts on items listed under the <i>Heritage Act 1977</i> or historical archaeology were identified. It noted that an AHIP will be required prior to future development impacting on several low significance objects within Stage 2.</p> <p>Council requested that a heritage interpretation strategy be prepared and submitted with the master plan.</p> <p>Heritage NSW supported the development of a heritage interpretation strategy and provided recommendations to update the ACHAR to clarify the assessment of culturally modified trees which should not be impacted, implementing strategies to protect Aboriginal objects within open spaces and riparian corridors and include detailed impact assessment to support future AHIP applications, continuous consultation with registered Aboriginal parties, and justification for certain test excavations.</p> <p>The proponent provided an updated ACHAR in response to Heritage NSW recommendations and provided confirmation by the proponent's arborist and ecologist that there are no culturally modified trees on the site. An additional control has been included in the master plan to require opportunities for heritage interpretation to be considered. The control includes provisions relating to engagement of Aboriginal artists, paving, murals, name conventions, native plant species and informative Aboriginal history of the site.</p> <p>The Department acknowledges the findings of the ACHAR and archaeological test excavations and is satisfied with the results of the investigation into the culturally modified trees. The Department is satisfied that the additional control for heritage interpretation is appropriate. Although a number of low significance Aboriginal objects may need to be removed as part of the development through a consent process, the Department is satisfied that the recommendations of the ACHAR ensure suitable salvage and storage requirements be determined in consultation with traditional owners through the AHIP process.</p>
Economic impacts	<p>An economic assessment report (EAR) was submitted with the master plan and supported by the TAP. The EAR provides retail market depth and demand analysis, retail impact assessment, commercial office impact assessments and economic benefits assessment. The EAR also provided an assessment of the proposed amalgamation of the two neighbourhood centres planned for the site under the precinct plan into one centralised local centre and the economic</p>

Issue	Findings and conclusions
	<p>impacts to planned local centres on neighbouring sites and the Bradfield City Centre.</p> <p>The EAR found that the master plan would support 12,429 ongoing jobs, including 7,144 direct jobs on-site in industries such as logistics, manufacturing, wholesale trade, office, and retail, and 5,285 indirect jobs in sectors like professional services, telecommunications, and manufacturing. It also concluded that the proposed consolidation of local centres is unlikely to undermine the commercial viability of other planned centres as no additional retail (beyond what is planned) is proposed for the site.</p> <p>Public submissions received during the exhibition period of the master plan raised issue with the claimed potential economic benefits of development of the master plan site. Concerns related to accuracy of employment figures, impacts on existing agricultural uses and general concerns of the effect of fees and taxes on private sector investment. The proponent noted that employment figures were calculated based on relevant Department guidelines. It also noted that the master plan seeks to deliver critical employment floorspace in a strategic location zoned for industrial land uses.</p> <p>The Department supports the findings of the EAR including the proposal to amalgamate the two planned neighbourhood centres into one local centre. The Department concludes that the master plan aligns with the vision for the Western Sydney Aerotropolis by providing significant employment floorspace to facilitate industrial operations in Western Sydney.</p>
Open space	<p>The master plan aims to provide essential employment floorspace in a strategically zoned industrial area, complemented by open spaces and riparian corridors to establish a connected blue and green network across the site linking with the wider Aerotropolis Precinct. The master plan proposes 45.6 hectares of open space and landscaped areas including extensive pedestrian and bicycle pathways, active and passive open space areas and land to be protected and managed for its biodiversity values across three riparian corridors and a park within the Local Centre.</p> <p>A public submission raised issue with the lack of open space provided by the master plan.</p> <p>An assessment of the master plan has been undertaken against the current planning framework which provides extensive controls and targets for landscaping, tree canopy cover, blue-green infrastructure, public and open spaces and protection of land mapped under the Western Parkland City SEPP as ENV land.</p> <p>The Department is satisfied that the master plan site provides adequate open space throughout the site in accordance with the Western Parkland City SEPP, precinct plan and DCP provisions and meets the vision set out in the Western Sydney Aerotropolis Plan and the requirements of the biodiversity certification</p>

Issue	Findings and conclusions
	<p>order. As no dedication of land to a public authority has been agreed and no acquisition authority identified for the open space on the site it will be subject to management and maintenance arrangements by IPG under the master plan until arrangements to dedicate the land to a public authority are made.</p>



## 7 Evaluation

The Department's assessment has considered the relevant matters and objects of the EP&A Act, including the principles of ecologically sustainable development (Sections 4 & 0), the relevant requirements of the Western Parkland City SEPP, particularly in relation to precinct plans, master plans and complying development, advice from government agencies, Council and public submissions (Section 5), and strategic government policies and plans (Section 4).

This includes consideration of the master plan (as amended), the planning report and technical appendices, RtS, response to request for further information (RRFI) and assessed the merits of the proposal, taking into consideration advice from public authorities and comments from Council. Issues raised in the public submissions have also been considered and all environmental issues associated with the proposal have been thoroughly assessed.

Overall, the Department's assessment concludes the IPG Badgerys Creek Road Master Plan is acceptable as it has demonstrated consistency with the Aerotropolis planning framework, including the:

- Western Sydney Aerotropolis Plan
- Western Parkland City SEPP
- Precinct plan
- Master plan guidelines and requirements, and
- DCP.

The Department considers the master plan to be consistent with the Aerotropolis planning framework, that statutory requirements for approval under Section 4.41 of the Western Parkland City SEPP have been satisfied, community and agency views have been considered, key assessment issues have been resolved, and the master plan establishes a superior planning outcome for the IPG site.

The Department is satisfied that the issues raised by government agencies, Council and the community have been adequately addressed by the proponent in the RtS, response to request for information, the Department's assessment report and the amended master plan.

If approved, it is expected the master plan will enable a new employment precinct for the Aerotropolis within close proximity to the Western Sydney Airport and Bradfield City Centre, that will positively contribute to the wider Western Parkland City in accordance with the strategic vision set by the WSA. Consistent with the advice from the TAP and Government Architect NSW, the master plan will provide key planning and complying development controls ensuring future built

form and the public domain can be delivered efficiently, will exhibit a high degree of design quality and provide active and sustainable spaces.

The design of the master plan has been informed by connecting with Country principles and ongoing Aboriginal engagement. The master plan has considered the Recognise Country: Guidelines for development in the Aerotropolis and is satisfied that the master plan has been designed with appropriate consideration of aboriginal cultural values. The master plan has taken a landscape led approach, providing a blue-green infrastructure framework for the site, preserving and providing 45.6 hectares of open space and landscaped areas consisting of active and passive open space areas and high biodiversity value existing native vegetation across three riparian corridors and the local park within the local centre.

The IPG Badgerys Creek Road is a key component in achieving the vision of the WSAP to create an accessible, innovative employment precinct with great places as it will have the capacity to:

- generate up to 12,429 jobs within the enterprise estate
- supply 506,530 m<sup>2</sup> of enterprise and light industry GFA, 118,417 m<sup>2</sup> of business and commercial GFA and 520m<sup>2</sup> of retail GFA, and
- provide 45.66 hectares of open space.

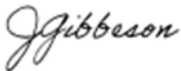
As such, the Department considers that the master plan is in the public interest and is recommended for approval.

## 8 Recommendation

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

- considers the findings and recommendations of this report
- **accepts and adopts** the findings and recommendations in this report as the reasons for making the decision to grant approval to the master plan application
- **grants approval** to the IPG Badgerys Creek Road Master Plan (WSA\_MP01) under section 4.41 of the Western Parkland City SEPP and its publishing on the NSW planning portal
- notes that the Minister's approval is sought separately for the supporting:
  - amended Western Sydney Aerotropolis Precinct Plan, prepared by the Department to reflect the master plan, and
  - amendments to the Western Parkland City SEPP exempt development provisions and land reservation acquisition map, land zoning map and transport corridors map.

Recommended by:



**James Gibbeson**  
Senior Planning Officer  
Regional Assessments

Recommended by:



**Stuart Withington**  
Team Leader  
Regional Assessments

Recommended by:



**Louise Densmore**  
Director  
Regional Assessments

Recommended by:



**Ben Lusher**  
Executive Director  
Housing and Key Sites Assessments

# Glossary

Abbreviation	Definition
<b>AHD</b>	Australian height datum
<b>DCCEEW</b>	NSW Department of Climate Change, Energy, the Environment and Water
<b>BDA</b>	Bradfield Development Authority, the trading name of the Western Parkland City Authority
<b>Council</b>	Liverpool City Council
<b>DCP</b>	Western Sydney Aerotropolis Development Control Plan 2022
<b>Department</b>	Department of Planning, Housing and Infrastructure
<b>EDC</b>	Estimated Development Cost
<b>EPA</b>	NSW Environment Protection Authority
<b>EP&amp;A Act</b>	<i>Environmental Planning and Assessment Act 1979</i>
<b>EP&amp;A Regulation</b>	Environmental Planning and Assessment Regulation 2021
<b>EPBC Act</b>	<i>Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)</i>
<b>EPI</b>	Environmental planning instrument
<b>ESD</b>	Ecologically sustainable development
<b>Heritage</b>	Heritage NSW, within the NSW Department of Climate Change, Energy, the Environment and Water
<b>LEP</b>	Local environmental plan
<b>Master plan</b>	IPG Badgerys Creek Road Master Plan
<b>Minister</b>	Minister for Planning and Public Spaces
<b>Precinct plan</b>	Western Sydney Aerotropolis Precinct Plan
<b>Proponent</b>	Ingham Property Group (IPG)
<b>Secretary</b>	Secretary of the Department of Planning, Housing and Infrastructure

Abbreviation	Definition
<b>SEPP</b>	State environmental planning policy
<b>TfNSW</b>	Transport for NSW
<b>Western Parkland City SEPP</b>	State Environmental Planning Policy (Precincts—Western Parkland City) 2021

## Appendices

Appendix A	List of referenced documents
Appendix B	Submissions and government agency advice
Appendix C	Strategic considerations
Appendix D	Statutory considerations
Appendix E	Amendments to precinct plan
Appendix F	Variations to DCP controls
Appendix G	TAP Letter of advice to Secretary
Appendix H	Master plan requirements