

Department of Planning, Housing and Infrastructure

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# ALDI Automated Distribution Centre

State Significant Development Assessment Report (SSD-76913969)

February 2026





# Acknowledgement of Country

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# Preface

This report details the Department of Planning, Housing and Infrastructure's (the Department) assessment of the State significant development application for the ALDI Automated Distribution Centre (ADC) (the development).

The Department's assessment considers all documents submitted by ALDI Foods Pty Ltd (the Applicant), including the Environmental Impact Statement (EIS), Submissions Report and Additional Information, submissions received from the public and Liverpool City Council, advice from government authorities, and all legislation and planning instruments relevant to the site and the development.

The report includes:

- a description of the development and the surrounding environment
- an assessment of the development against government policy and statutory requirements, including mandatory considerations
- an explanation of why the development is SSD and who the consent authority is
- consideration of matters raised by the community and other stakeholders
- an assessment of the likely environmental, social and economic impacts of the development and recommendations for managing any impacts during construction and operation
- an evaluation which weighs up the likely impacts and benefits of the development, having regard to the proposed mitigation measures, community views and government advice, and provides a view on whether the impacts are, on balance, acceptable
- a recommendation to the decision-maker, along with the reasons for the recommendation, to assist them in making an informed decision about whether development consent for the development should be granted and any conditions that should be imposed.

# Executive Summary

## Introduction

ALDI Foods Pty Ltd (the Applicant) proposes to construct and operate a 24/7 large format high-bay automated warehouse and distribution centre at 475 Badgerys Creek Road, Bradfield, in the Liverpool City local government area (LGA) within the Western Sydney Aerotropolis (WSA).

The development has a capital investment value of > \$1 billion and is expected to generate up to 3,728 construction jobs and 585 operational jobs.

The development will be a landmark investment by a globally recognised business in Western Sydney, and specifically the Aerotropolis, an 11,200 hectare (ha) strategically planned area which supports economic investment and employment around the Western Sydney International (Nancy Bird Walton) Airport (WSI Airport).

## Site Context

The site is located on Dharug Country and comprises approximately 22.1 ha of ENT Enterprise zoned land in the Aerotropolis Core Precinct of the WSA under State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (Western Parkland City SEPP).

The ALDI ADC is proposed to be located within the 184-hectare Ingham Property Group (IPG) Master Plan, approved by the Minister for Planning and Public Spaces (the Minister) on 11 July 2025.

## Proposal

The development comprises a total gross floor area of 106,706 square metres (m<sup>2</sup>), including a 103,546 m<sup>2</sup> fully automated warehouse comprised of ambient, chilled and freezer zones, warehouse fitout (including racking and automated search and retrieval system), an ancillary office, gatehouse, truck wash and refuelling area, 119 loading docks, five heavy and light vehicle access driveways, on-site parking for 408 vehicles and landscaping. Heights vary across the proposed warehouse from a minimum of 22.8 m, with three high bay components up to a maximum of 42 m.

## Statutory Context

The development is classified as State significant development (SSD) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) because it involves development with an estimated development cost greater than \$30 million in the Western Sydney Aerotropolis which meets the criteria in Clause 29 of Schedule 1 in State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP). Consequently, the Minister is the consent authority for the development under section 4.5(1) of the EP&A Act.

## Engagement

The Department of Planning, Housing and Infrastructure (the Department) exhibited the development application and accompanying EIS for the development from 30 May 2025 until 26 June 2025. During the exhibition period, the Department received no public submissions from the public, a submission from Liverpool City Council (Council), advice from 14 government authorities, utility providers and State-owned corporations.

Key issues raised in Council and government authority submissions related to infrastructure delivery, water management, traffic and access, consistency with the strategic planning framework, noise, hazards and risk, and Aboriginal cultural heritage.

Following public exhibition, the Department sought detailed responses from the Applicant to address issues raised. The Applicant submitted a Submissions Report on 27 October 2025, which included updated technical assessments, revised architectural, landscape and civil plans, and further information on infrastructure staging, waterway health, statutory compliance and mitigation measures. The report was circulated to relevant authorities, several of which reiterated requests for further information, including Council, the Conservation Programs and Heritage Regulation Group of Department of Climate Change, Energy, the Environment and Water (CPHR), Department of Primary Industries and Regional Development - Agriculture, NSW Environment Protection Authority (EPA), Heritage NSW and Sydney Water, while other agencies, including the Bradfield Development Authority, DCCEEW – Water, Rural Fire Service and Transport for NSW (TfNSW), confirmed they had no remaining concerns subject to conditions.

In response to residual issues, the Department requested additional information in November 2025, facilitating further discussions between the Applicant, Sydney Water and CPHR to clarify stormwater design and interim waterway health requirements. The Department also liaised extensively with the EPA to resolve concerns regarding the assessment and management of noise impacts. Additional information was provided by the Applicant in December 2025 and February 2026, after which Sydney Water, CPHR and the EPA confirmed their concerns were resolved, subject to conditions. Council, however, continued to express concerns regarding the timely delivery of supporting infrastructure. The Department has considered all submissions and advice, the Applicant's Submissions Report, and subsequent additional information in its assessment of the proposal in **Section 1**.

## Assessment

The Department's assessment of the application has fully considered all relevant matters under section 4.15 of the EP&A Act, the objects of the EP&A Act and the principles of ecologically sustainable development. The Department has identified the key issues for assessment are:

Infrastructure delivery - IPG and ALDI have entered into a commercial agreement under which IPG, as the landowner, is responsible for delivering all enabling infrastructure and services to support the

ALDI ADC development. These enabling works are progressing under separate assessment pathways, including applications for complying development certificates and development consent under Part 4 of the EP&A Act and approvals under Part 5 (development without consent) of the EP&A Act. To ensure the orderly and economic delivery of land, as required by the objects of the EP&A Act, conditions limit construction and operational commencement subject to the delivery and operation of relevant supporting infrastructure

Traffic and access - The development would generate approximately 1,990 daily vehicle movements, including 1,068 heavy vehicles. Peak-hour traffic volumes will remain within the approved traffic volumes under the IPG Master Plan. The Applicant's assessment is conservative and robust and confirms that traffic volumes during construction and operation can be accommodated on the surrounding road network provided required new roads and upgrades are delivered prior to commencement. Conditions require evidence of completed roads and road upgrades, detailed construction traffic management planning, and appropriate driveway and on-site vehicle circulation design. These conditions ensure that traffic impacts will be acceptable and that the development can be safely and efficiently integrated into the evolving road network of the Aerotropolis.

Water management - the Applicant's stormwater strategy adopts a staged approach that manages both water quality and flow during construction and operation through erosion and sediment controls, and interim measures designed to meet the waterway health targets in the Western Sydney Aerotropolis Development Control Plan and the *Technical Guidance for achieving Wianamatta-South Creek stormwater management targets* (DPE, 2022). Following extensive consultation with CPHR and Sydney Water, both authorities confirmed they were satisfied with the Applicant's approach to managing stormwater, subject to conditions ensuring integration with future regional basins, installation of temporary sediment controls before construction, and completion of off-site detention infrastructure before operation. The Department's assessment found that the Applicant's approach appropriately manages stormwater, provided conditions are imposed to ensure delivery and integration of regional stormwater infrastructure, finalisation of detailed designs in consultation with CPHR, Sydney Water and Council, and preparation of a comprehensive Water and Stormwater Management Plan to ensure compliance with waterway health targets.

Noise - The Applicant's assessment of noise concluded that, with feasible and reasonable mitigation, operational noise from the development could meet the adopted project noise trigger levels for nearby receivers. Construction noise was predicted to exceed the relevant noise management levels at some locations but can be managed through proposed mitigation measures. The EPA maintained concerns regarding the assessment approach for existing rural residences in the rezoned ENT Enterprise land. The Department acknowledged the Applicant's approach was consistent with that approved under the IPG Master Plan but agreed with the EPA that the existing residences must be afforded a level of protection from noise impacts. Conditions therefore require a Noise Mitigation

Review and potential at-receiver treatments for these receivers if any complaint is received in the first year of operations. Operational noise limits and noise verification will ensure impacts on residents are minimised throughout construction and operation of the development.

## Conclusion

The Department's assessment concludes the impacts of the development can be mitigated and/or managed to ensure an acceptable level of environmental performance, subject to the recommended conditions of consent.

Overall, the Department's assessment has concluded the development would:

- support the development of the warehouse and logistics sector connected to the WSI Airport
- be consistent with the strategic direction for the site under the Aerotropolis Plan, Western Parkland City SEPP, WSA Precinct Plan and the IPG Master Plan
- incorporate high quality design finishes, materials, artwork, landscaping into the design of the development, developed through a Country-led design process
- contribute additional industrial floorspace to support the growth of the Aerotropolis and associated warehouse and logistics sector
- represent an investment of over \$1 billion in the Liverpool City LGA and provide up to 3,728 construction jobs and 585 operational jobs.

Consequently, the Department considers the development is in the public interest and is recommended for approval, subject to conditions.

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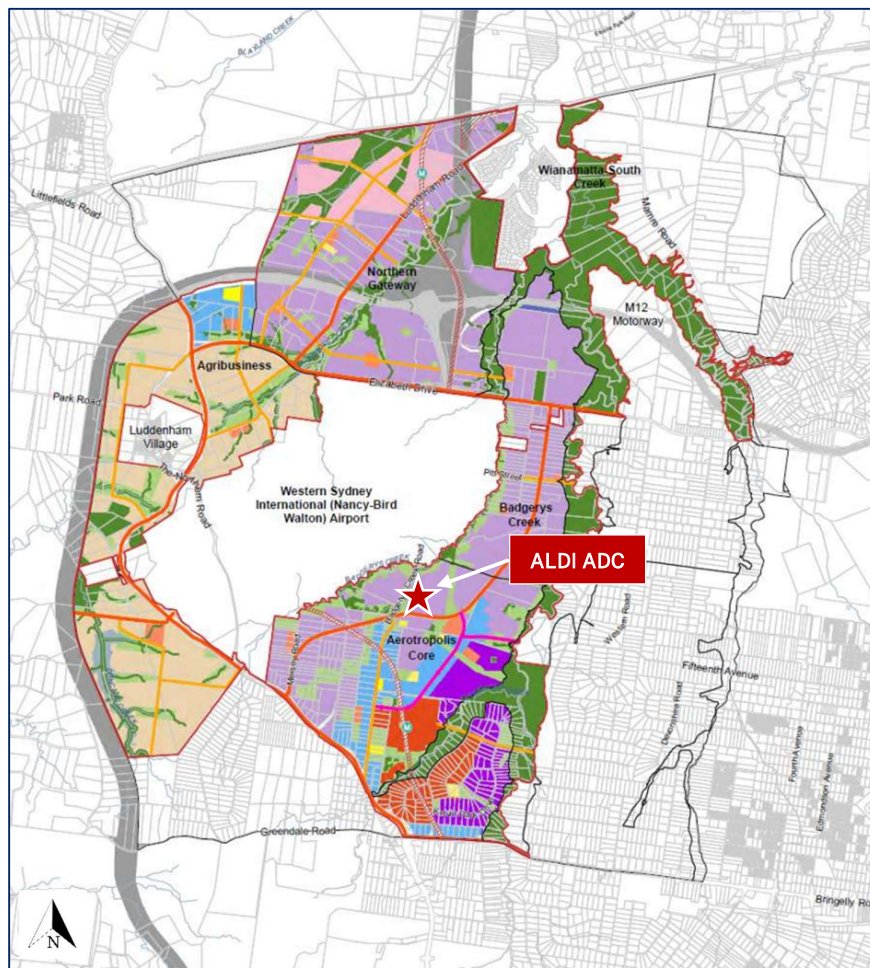
# 1 Introduction

## 1.1 Development Background

ALDI Foods Pty Ltd (the Applicant) is seeking development consent for the construction and operation of a 24/7 large-format warehouse and automated distribution centre (the development).

ALDI is an international discount supermarket chain with almost 600 stores across NSW. The ADC will provide daily goods to more than 200 ALDI stores across NSW and is also intended to facilitate the ongoing expansion of ALDI's store network throughout the State.

The development is at 475 Badgerys Creek Road, Badgerys Creek in the Aerotropolis Core Precinct of the 11,200 hectare (ha) Western Sydney Aerotropolis (Aerotropolis) in the Liverpool City local government area (LGA). The Aerotropolis is a strategically planned area surrounding the new Western Sydney International (Nancy-Bird Walton) Airport (WSI Airport) (refer **Figure 1**). The Aerotropolis Core is a dense urban precinct planned around the Aerotropolis Metro station and the Wianamatta-South Creek corridor system. It is defined by a new regional park along Thompsons Creek and a focus on the new metropolitan centre – Bradfield City Centre.

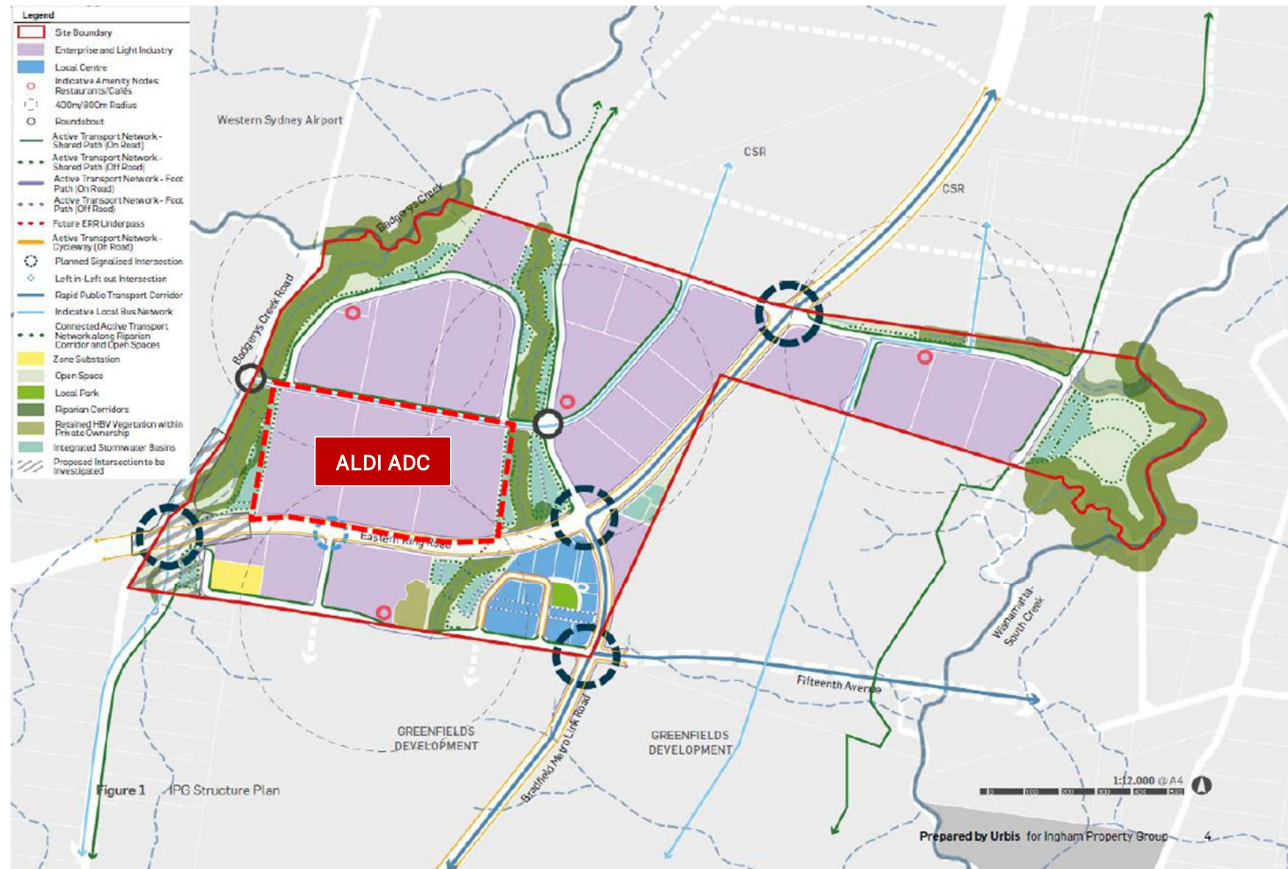


**Figure 1 | Regional Context – Western Sydney Aerotropolis**

The site is within a first priority area for the delivery of supporting infrastructure, in accordance with the Western Sydney Aerotropolis Precinct Plan (WSAPP).

The ADC is proposed to be located across three development lots within the 184-hectare Ingham Property Group (IPG) Master Plan, approved by the Minister for Planning and Public Spaces (the Minister) on 11 July 2025 (refer **Figure 2**). The Master Plan established a framework for site-specific planning controls and complying development certificate (CDC) pathways for future development (an assessment based on meeting development standards, not merit).

The IPG Master Plan relates to a staged mixed-use development, primarily industrial in nature, with additional commercial, business park and retail uses. The ALDI proposal forms part of the first stage of development to be delivered in the Master Plan area. As the landowner, IPG is responsible for delivering all supporting infrastructure (roads, stormwater, sewer, services) for the construction and operation of the ALDI development. The ALDI ADC application relies on several of the technical impact assessments carried out to support the approved Master Plan.



**Figure 2 | Location of ALDI ADC in Ingham Property Group Master Plan**

## 1.2 Site Description

The site comprises approximately 22.1 ha of ENT Enterprise zoned land (see **Figure 2**) under State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (Western Parkland City SEPP) and is legally described as Lot 100 in DP 1287207. Access to the site is off Badgerys Creek Road (BCR).



### 1.3 Surrounding Land Uses

The WSI Airport is approximately two kilometres to the northwest of the site and is currently in the final stages of construction. Airport operations are expected to commence by the end of 2026. To the north, the site is bound by a large CSR-owned landholding and the Greenfields Development Company (GDC) site list to the south, the latter currently subject to a separate concurrent Master Planning process, currently under assessment.

The closest residential receivers are located approximately 400 m south and southwest of the site, in Bradfield. These receptors are on land zoned ENT Enterprise, also within the Aerotropolis Core Precinct. It is therefore expected that this area will transform over time as land uses transition to that envisaged for the Aerotropolis. In the future, it is anticipated that the land surrounding the site will be characterised by other commercial and industrial uses, as identified in the WSAPP and Western Parkland City SEPP.

Other existing residential properties lie approximately two kilometres to the east, at Rossmore and Kemps Creek, outside the rezoned Aerotropolis land. This land is earmarked for intensification of residential land use to medium density residential, as noted in the Western Sydney Aerotropolis Plan (WSA Plan).

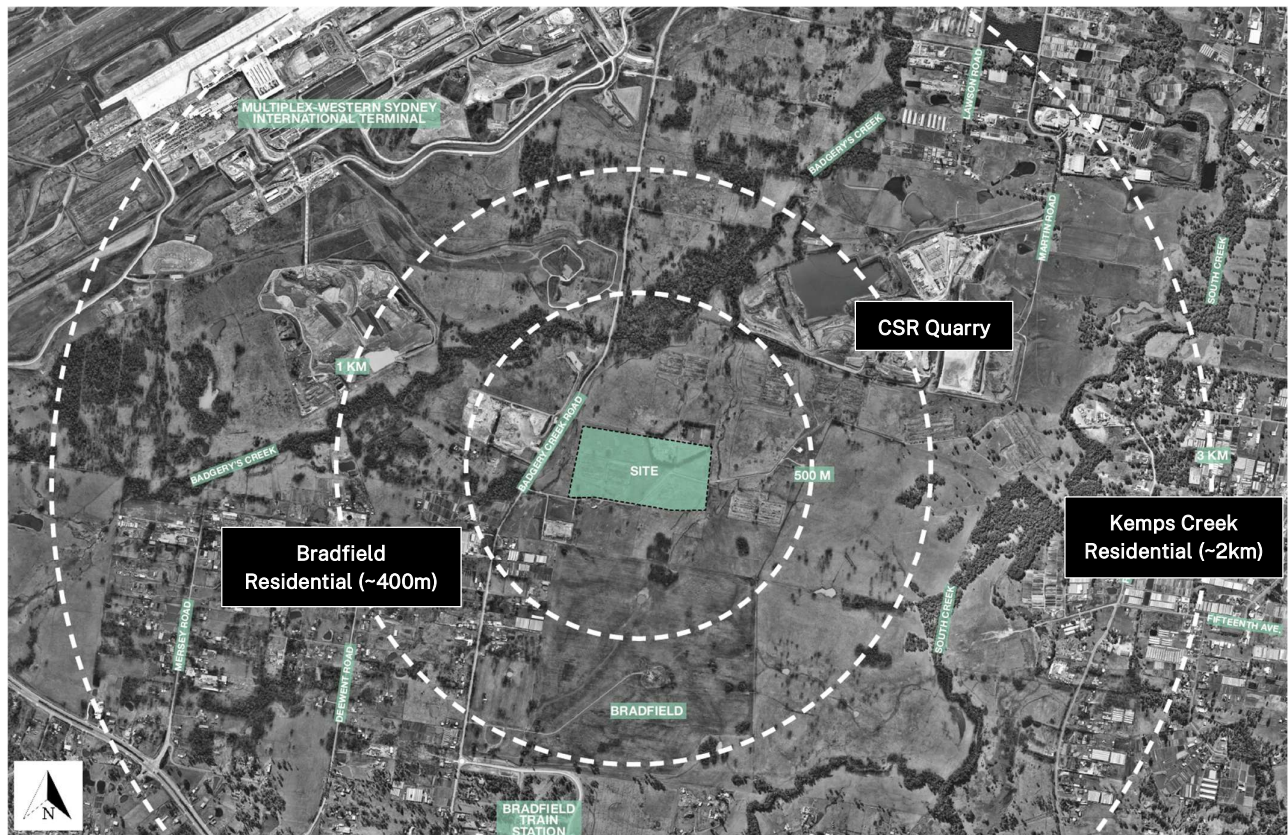


Figure 5 | Surrounding Land Uses

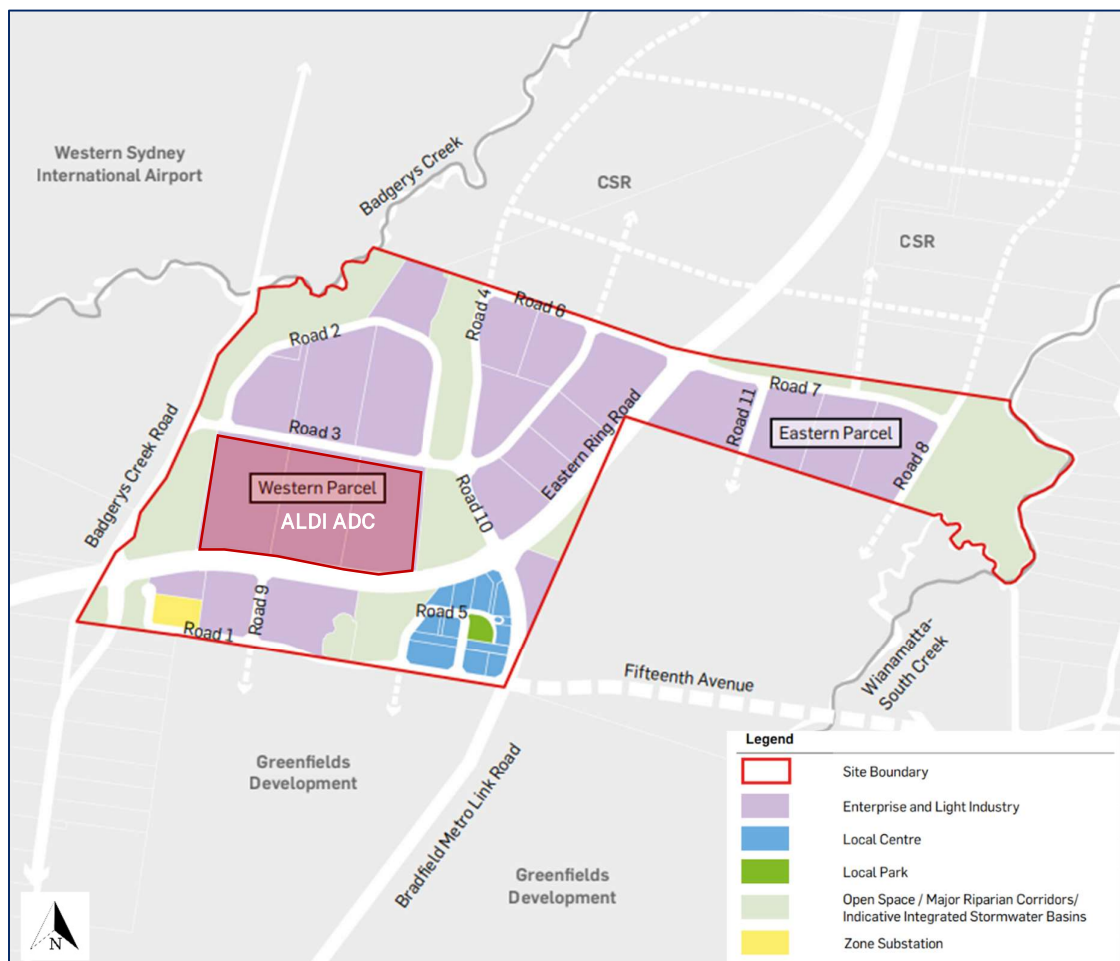
## 1.4 Other Development Approvals

The IPG Master Plan, approved by the Minister on 11 July 2025, includes an enterprise estate with warehouse and distribution centres, light industry, and a small-scale local centre with commercial uses, as well as open space. The Master Plan included several amendments to the statutory planning framework to reflect the Master Plan design. This included changes to planning controls in the Western Parkland City SEPP, the WSAPP and the Western Sydney Aerotropolis Development Control Plan (WSA DCP), realignment of key transport corridors and land reservation acquisition, a suite of site-specific development controls (in addition to the DCP).

A key outcome of the Master Plan was the establishment of a bespoke exempt and complying development code for most development to be carried out within the Master Plan area, including built form, roads and open space. This allows for a streamlined approach for future development.

No physical building or construction works can be undertaken as part of the Master Plan. All future development within the Master Plan area is subject to separate planning applications.

The proposed ADC site is located within the Western Parcel of the proposed IPG Master Plan area and is bounded by IPG Estate Road 3 (Road 3) to the north and the Eastern Ring Road to the south. The ADC is in Stage 1 of the IPG Master Plan (refer **Figure 6**).



**Figure 6 | IPG Master Plan Land Use Plan**

## 2 Development

### 2.1 Description of the Development

The major aspects of the development are summarised in **Table 1** and shown in **Figure 7** to **Figure 11**, and described in full in the Environmental Impact Statement (EIS), Submissions Report and Additional Information included in **Appendix A**.

**Table 1 | Main Aspects of the Development**

Aspect	Description
Development Summary	<b>Construction and operation of a 24/7 large-format warehouse and automated distribution centre, including fit-out, ancillary office space, loading areas, parking, landscaping and associated site facilities.</b>
Physical layout and design	Total gross floor area of 106,706 square metres (m <sup>2</sup> ), including: <ul style="list-style-type: none"> <li>• 103,546 m<sup>2</sup> warehouse comprised of ambient, chilled and freezer zones</li> <li>• 2,813.4 m<sup>2</sup> ancillary office</li> <li>• 78 m<sup>2</sup> gatehouse</li> <li>• 268.8 m<sup>2</sup> truck wash</li> </ul> The development also includes warehouse fitout (including racking and automation), 119 loading docks, truck refuelling area, heavy and light vehicle access driveways, on-site parking for 408 vehicles and landscaping
Signage	Tenant and directional signage, including: <ul style="list-style-type: none"> <li>• x3 illuminated tenant pylon sign (10m x 2m)</li> <li>• x1 illuminated tenant office pylon sign (1.8m x 1.2 m)</li> <li>• x1 illuminated tenant sign fixed to office (2.4m x 2.0 m)</li> <li>• x8 illuminated tenant sign fixed to warehouse (7.2 m x 6.0 m)</li> <li>• x1 illuminated directional pylon sign (1.8 m x 1.4 m)</li> </ul>
Maximum height	Heights vary across the proposed building from 22.8 m, with three high bay components up to a maximum of 42 m: <ul style="list-style-type: none"> <li>• ambient high bay - 41.8 m</li> <li>• freezer high bay - 38.0 m</li> <li>• chiller high bay - 36.7 m</li> </ul>
Site area	22.1 hectares
Earthworks, civil works and services extensions	Detailed earthworks, retaining walls and batters are proposed to establish the proposed building pads

Aspect	Description
Stormwater infrastructure	<p>Stormwater infrastructure is limited to lot-level drainage works that are designed to integrate with regional stormwater infrastructure to be delivered by IPG and Sydney Water.</p> <p>Relies on interim and ultimate arrangements for stormwater being delivered by IPG, including:</p> <ul style="list-style-type: none"> <li>• construction – discharge to four oversized erosion and sediment control basins adjacent to the site</li> <li>• interim operation – discharge to four permanent regional basins adjacent to the site</li> <li>• ultimate operation – discharge to four permanent regional basins adjacent to the site, including connection to regional recycled water scheme</li> </ul>
Timing and Sequencing	<p>Construction anticipated to take 24 months, including site establishment, civil works, warehouse construction, and fit-out</p> <p>Automation commissioning and testing anticipated to take 12 months</p>
Traffic	Total of 1,990 vehicles per day (1,068 heavy vehicles, 922 light vehicles)
Access	<p>Five access driveways are proposed from Road 3, including inbound truck entry, inbound truck exit, outbound truck entry, outbound truck exit and a car park entry and exit driveway.</p> <p>Operational access:</p> <ul style="list-style-type: none"> <li>• Interim operational access via Road 3 and BCR</li> <li>• Ultimate operational access via Road 3 and BCR or via Road 10 of the IPG Master Plan to the Eastern Ring Road</li> </ul>
Landscaping	<p>35,322 m<sup>2</sup> of landscaping across the site, including feature entry planting, front setback planting, carpark planting, boundary planting and turf</p> <p>15% deep soil planting (33,209 m<sup>2</sup>)</p> <p>15.07% tree canopy (33,280 m<sup>2</sup>)</p>
Hours of operation	24 hours, 7 days
Estimated Development Cost	\$1,149,680,000
Employment	3,728 construction jobs and up to 585 full-time equivalent operational jobs

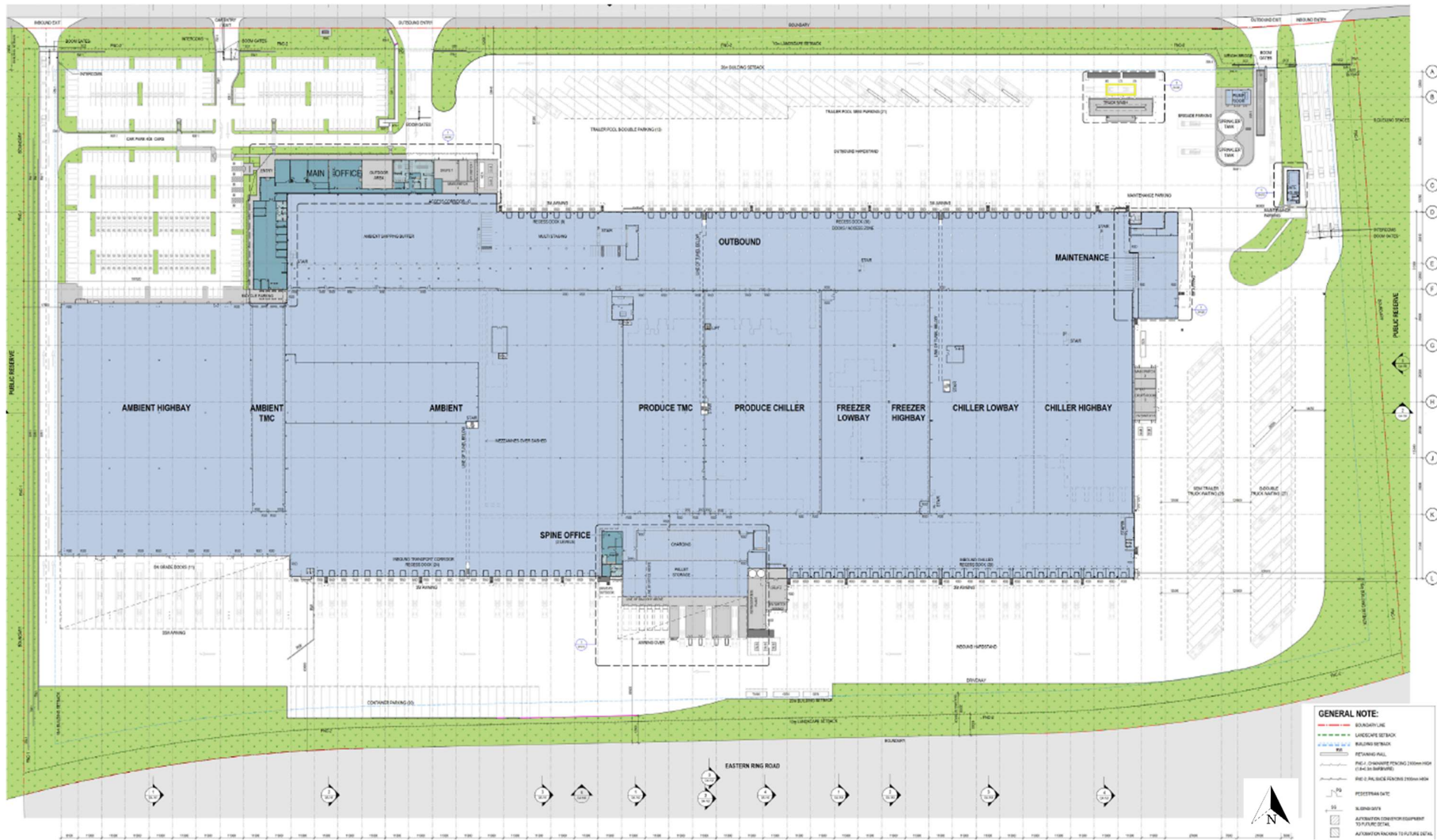


Figure 7 | Site Layout



**Figure 8 | Northern Perspective**



**Figure 9 | Ancillary Office – Northwest Perspective**



**Figure 10** | Ancillary Office and Warehouse– Northern Perspective

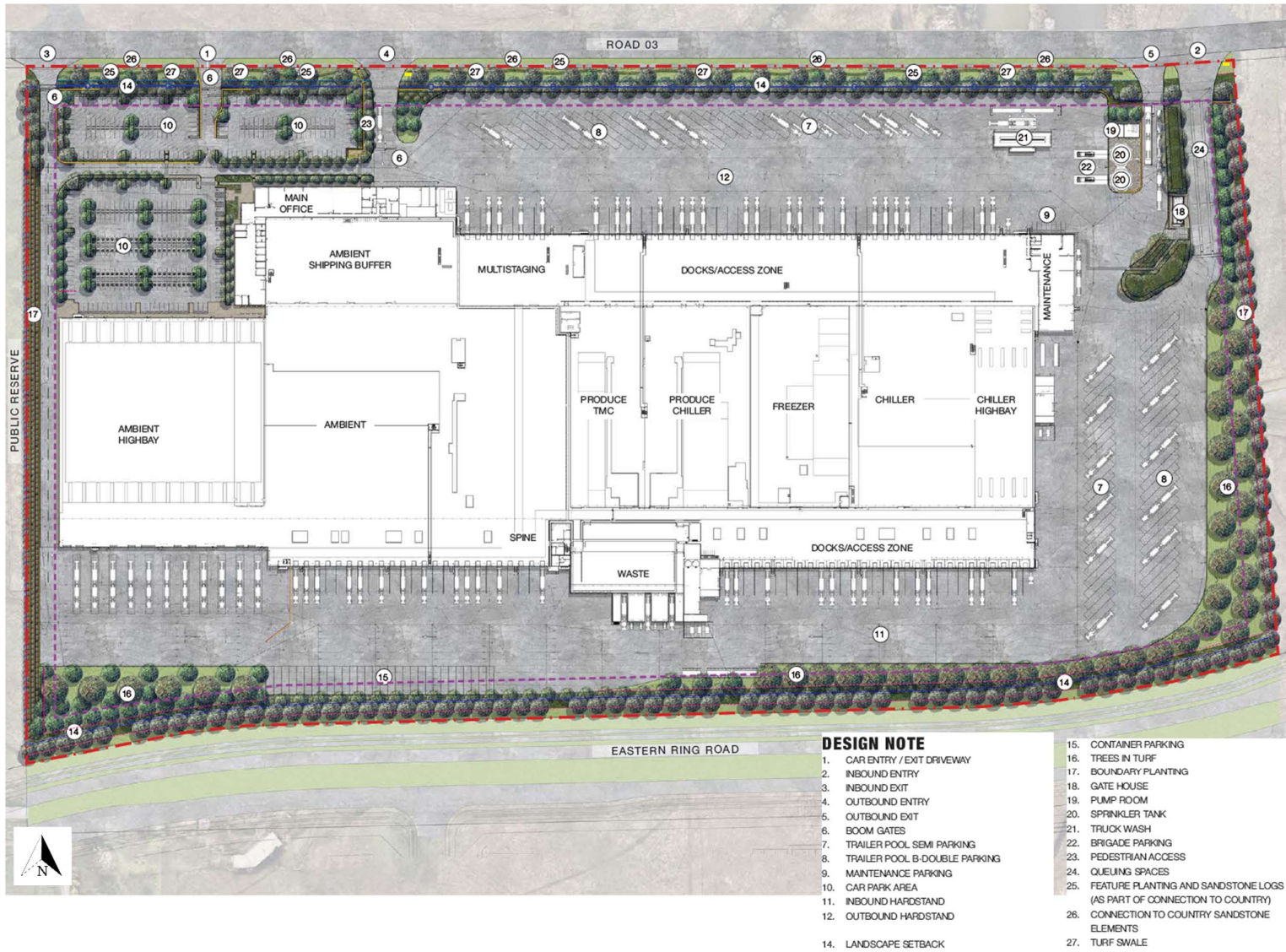


Figure 11 | Landscape Strategy

## 2.2 Warehouse Design

The design of the development has been tailored to support the highly automated distribution of goods. To enable the safe storage and distribution of goods, the warehouse will include a combination of temperature zones, including ambient, chilled and freezer zones. The facility will be highly automated with approximately 80% of the internal processes being performed unmanned.

The warehouse will incorporate three 'high bay' components to facilitate the storage and handling of goods, including an ambient high bay (41.8 m), freezer high bay (38 m) and chiller high bay (36.7 m). The bulk and scale of the development is broken up through lower rise warehouse components, building awnings, horizontal and vertical façade treatments and an ancillary office at the front of the building, adjacent to the car park.

The colour palette consists of lighter tones to minimise heat retention and enhance energy efficiency.

## 2.3 Site Access Design

Four site access driveways will be provided to enable entry and exit of heavy vehicles. The geometry of site access driveways, internal roads and loading dock have been designed to accommodate up to a 36.5 m A-double vehicle to 'future proof' the site. The maximum vehicle size expected to access the site at the commencement of operations is a 26 m B-double.

## 2.4 Stormwater Design

To facilitate construction of the development, IPG will construct four temporary sediment basins to manage stormwater discharges during construction. These have been approved under a CDC issued to IPG. These basins have been intentionally oversized so they can be retained as an interim operational stormwater management solution for the development (refer **Figure 12**). Ultimately these basins will form part of the Sydney Water regional stormwater management scheme, therefore, the ultimate design is to be approved by Sydney Water under Part 5 of the EP&A Act and will be established and operational prior to the commencement of operation of the development.

Stormwater detention will rely on the broader IPG Master Plan Estate detention strategy, which comprises two on-line detention basins along the central blue/green open space corridor (**Figure 13**).

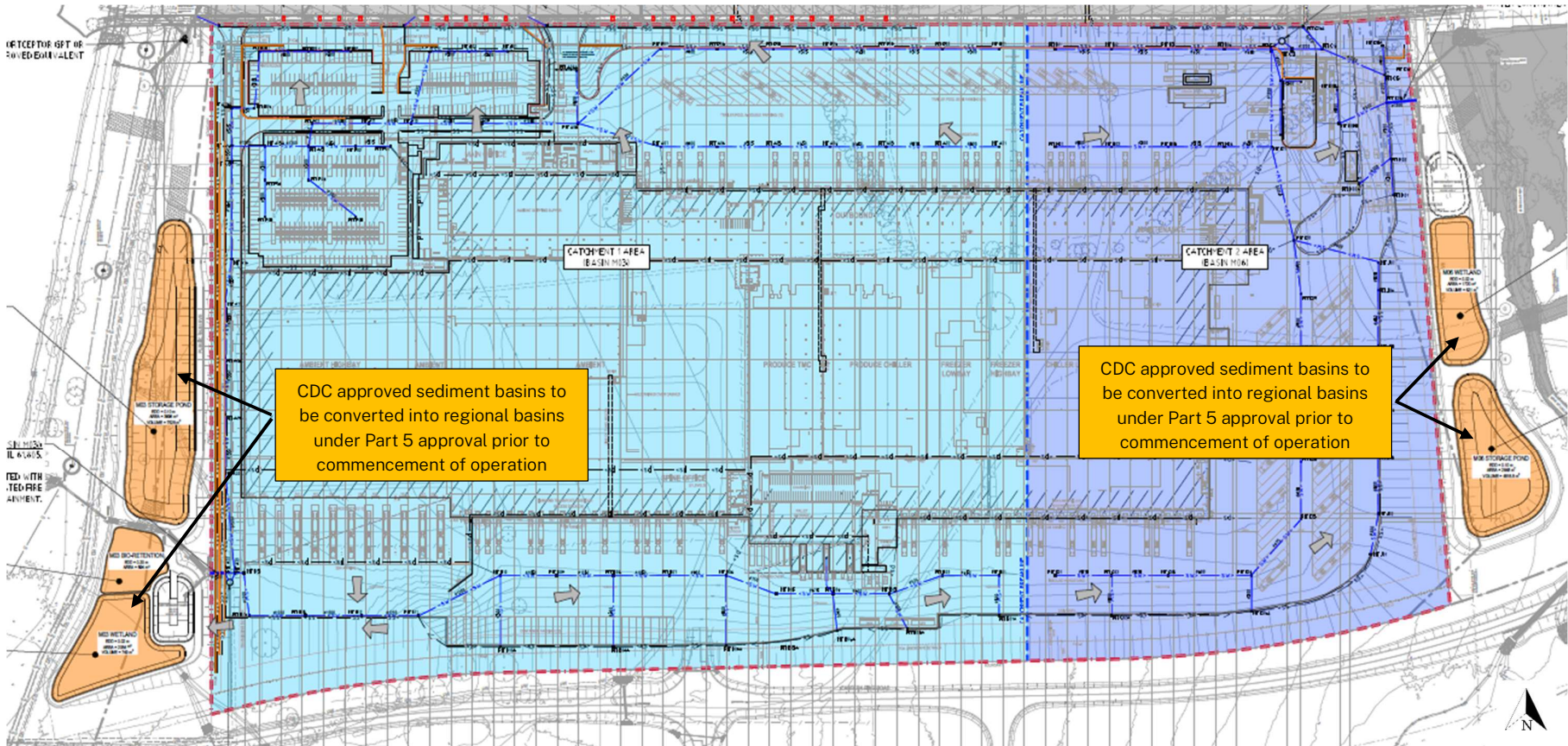
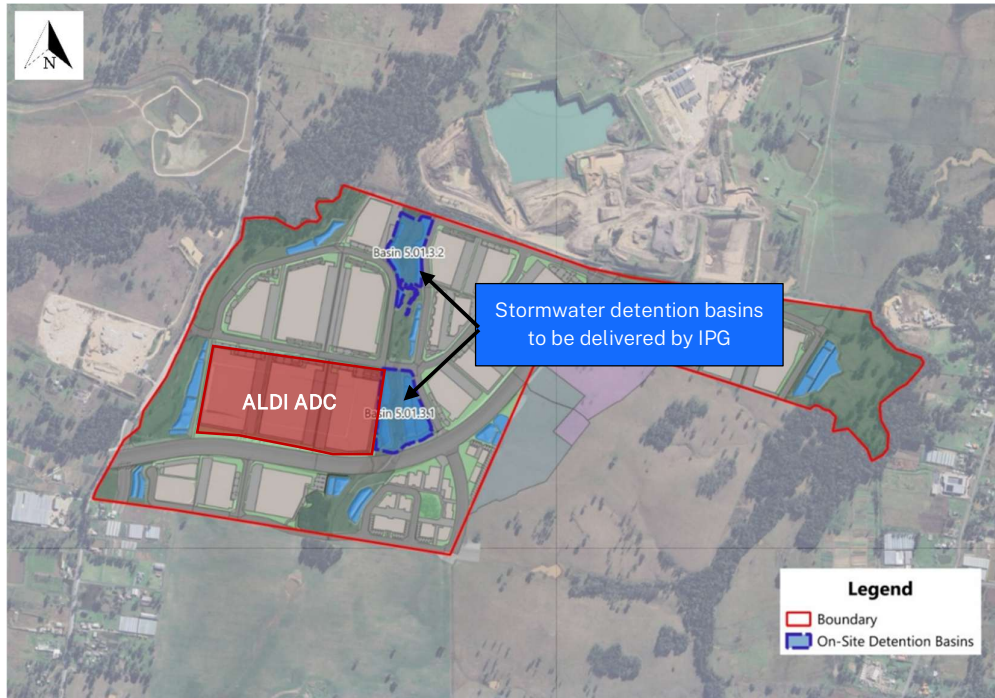


Figure 12 | Stormwater Management Strategy



**Figure 13 | IPG Stormwater Detention Strategy**

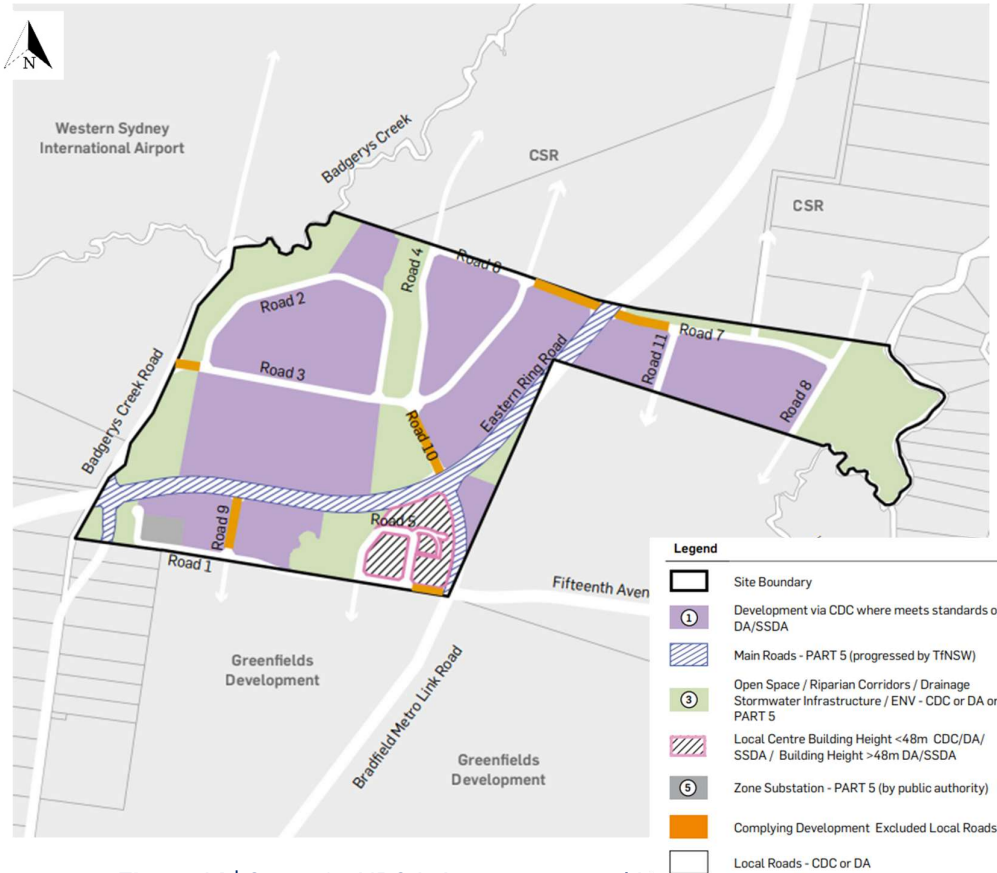
## 2.5 Related Development

### 2.5.1 IPG Master Plan

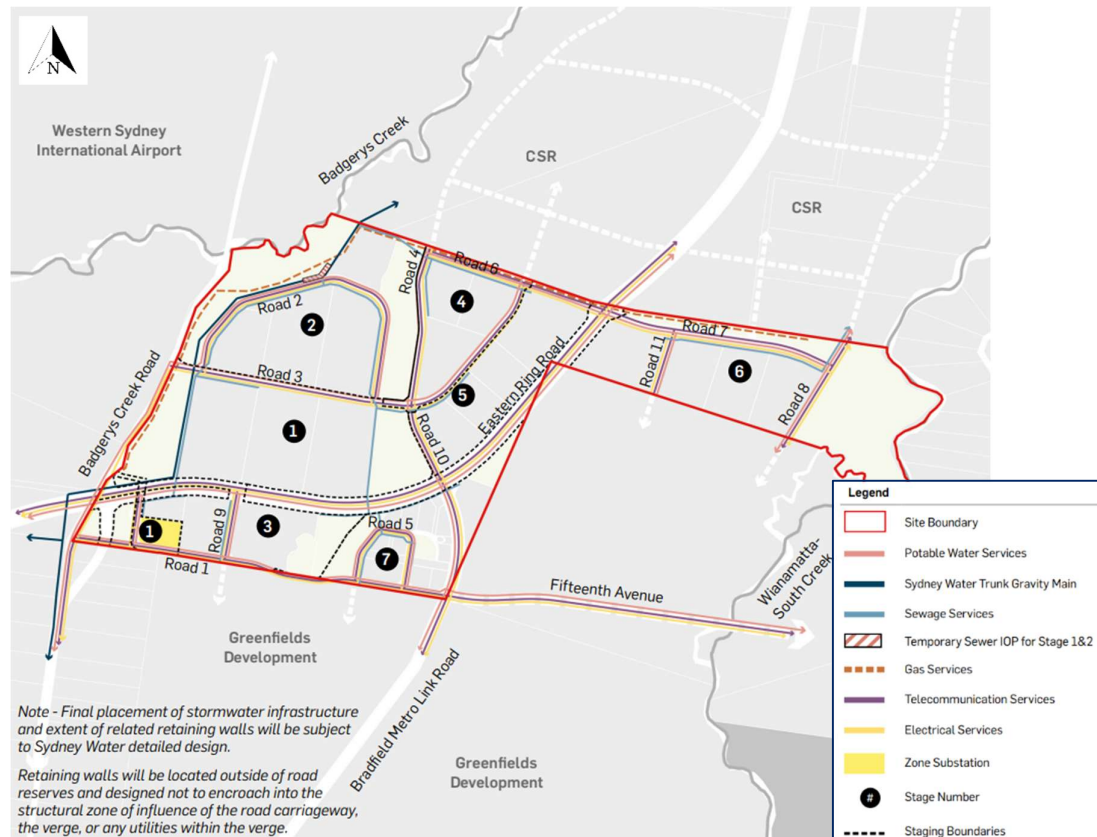
IPG and ALDI have entered into a commercial agreement under which IPG, as the landowner, is responsible for delivering all enabling infrastructure and services to support the ALDI ADC development. These enabling works are progressing under separate assessment pathways, including applications for complying development certificates (CDCs) and development consent under Part 4 and approvals under Part 5 (development without consent) of the EP&A Act (refer **Figure 14**).

The IPG Master Plan assessed the design and environmental impacts at a granular level of the proposed estate to enable the majority of development within the Master Plan to be carried out as complying development, negating the need for further environmental assessment. This includes warehouses with up to 100,000 sqm of GFA, stormwater infrastructure, open space, and retail and commercial buildings.

Therefore, all applications and associated works for road, water, sewer and services for the ALDI ADC are being carried out by IPG concurrently with the ALDI ADC DA assessment. The key components of IPG's scope include site preparation and bulk earthworks, access roads, utilities and essential services and erosion and sediment control measures. This key supporting infrastructure is illustrated in **Figure 15** and **Figure 16** below. The status of the supporting infrastructure as it relates to the ALDI ADC development (which forms part of Stage 1 of the IPG Infrastructure and Utilities Plan) at the writing of this assessment report is outlined below in **Table 2**. The anticipated timeframes for delivery of this infrastructure are outlined in **Table 3** below.



**Figure 14 | Stage 1 of IPG Infrastructure and Utilities Delivery Plan**



**Figure 15 | IPG Infrastructure and Utilities Plan**



**Figure 16 | Stage 1 of IPG Infrastructure and Utilities Delivery Plan**

## 2.6 Applicant's Justification for the Development

The Applicant considers the development is aligned with the overall strategic context, including the IPG Master Plan and the broader strategic planning framework. Furthermore, the Applicant is of the view the development is appropriate as it has demonstrated that all supporting infrastructure for the development will be delivered by IPG as part of the broader IPG estate in a timely manner.

Cumulative impacts of the development have been considered in the context of the broader IPG Master Plan and the broader locality, including in relation to the capacity of the surrounding road network and noise impacts. Additionally, the development will benefit from the regional water management infrastructure, which will appropriate management of hydrology and waterway health, including protection of ecological and cultural values.

The Applicant also states that feasible alternatives have been considered, and this analysis has concluded that the proposal is compatible with the surrounding development and the local context and will have minimal environmental impacts, subject to the implementation of appropriate mitigation measures. In conclusion, the Applicant is of the view the project aligns with relevant State and local strategic planning policies, as it will contribute additional industrial floorspace to support the growth of the Aerotropolis and associated freight and logistics network.

**Table 2 | Assessment Pathways and Status of Supporting Infrastructure**

Item	Scope of Works	Pathway	Application Reference	Determining Authority	Current Status
Access roads and permanent connections	Roundabout intersection of BCR and Road 3	DA	DA-424/2024	Council	Under assessment (recommendation made 11/6/25)
Subdivision	Procedural subdivision creating six lots, including subdivision of ALDI lot	CDC	CDC#1 (CD-1197/2025)	Private certifier	Approved
Bulk earthworks / erosion and sediment controls	Stage 1 bulk earthworks providing benched development pad, stormwater infrastructure and temporary sediment basins	CDC	CDC#2 (CD-1266/2025)	Private certifier	Approved
Construction access & temporary utilities	Construction access road and temporary power and water supply	CDC	CDC #3	Private certifier	Under assessment
Access roads and permanent connections / stormwater / sewer	Road 3, sewer interim operating procedure (IOP) and Sydney Water basins	CDC	CDC #4	Council	Under assessment
Stormwater	Regional stormwater basins	Part 5	Case No.216527	Sydney Water	Under assessment

**Table 3 | Infrastructure Delivery Timeframe Summary**

Item	Delivery Responsibility	Anticipated Delivery Timeframe
Electrical zone substation	Endeavour Energy	Completed December 2025
Road 3	IPG	December 2026
Roundabout at BCR and Road 3 intersection	IPG	December 2026
Stormwater basins and water management land	IPG	December 2026
Local open space	IPG	December 2026
Active transport linkages through open space and riparian corridor	IPG	December 2026
High voltage electrical feeder from electrical zone substation	IPG	December 2026
Sewer IOP	IPG	December 2026
Sewer main to lot boundary	IPG	December 2026
Upgraded water main along BCR	Sydney Water	December 2026
Trunk sewer mains	Sydney Water	December 2027

## 3 Strategic Context

### 3.1 Key Strategic Issues

The consistency of the development with key relevant strategies, plans and policies relevant to the assessment of the development are outlined in **Table 4** below.

**Table 4 | Summary of Key Government Strategies, Plans and Policies**

Strategy, Plan or Policy	Comments
<p><b>The Greater Sydney Region Plan – A Metropolis of Three Cities (Region Plan)</b></p>	<p>The Region Plan is built on a vision of three cities, the Western Parkland City, the Central River City and the Eastern Harbour City. The development is located within the Western Parkland City and would assist in achieving the objectives of the Region Plan by utilising industrial zoned land for industrial uses (Objective 16) and providing employment opportunities in Western Sydney (Objective 23).</p>
<p><b>Western City District Plan (District Plan)</b></p>	<p>The District Plan is a 20-year plan to manage growth in Western Sydney in the context of economic, social and environmental matters. The development would assist in achieving the following Planning Priorities in the District Plan:</p> <ul style="list-style-type: none"> <li>• maximising freight and logistics opportunities and planning and managing industrial and urban services land (W10)</li> <li>• growing investment, business opportunities and jobs in strategic centres (W11).</li> </ul>
<p><b>Western Sydney Aerotropolis Plan 2020 (WSAP)</b></p>	<p>The WSAP outlines the vision for the Aerotropolis describing a landscape-led approach, creating a global gateway, designing a cool, green new city, connecting with Country and providing employment opportunities.</p> <p>The development would assist in meeting the objectives of the WSAP by facilitating employment opportunities and providing development that is compatible with airport operations.</p>
<p><b>Western Sydney Aerotropolis Precinct Plan 2024 (WSAPP)</b></p>	<p>The WSAPP sets a vision for development of the Aerotropolis including land use, built form, blue/green corridors, Recognising Country and infrastructure delivery.</p> <p>The development aligns with the vision for the Aerotropolis Core Precinct, as it would provide employment focused development on land with good connections to major infrastructure including Elizabeth Drive and the M12 Motorway.</p>

Strategy, Plan or Policy	Comments
<p><b>Western Sydney Aerotropolis Development Control Plan 2022 (DCP)</b></p>	<p>The DCP establishes planning objectives and detailed controls for the Aerotropolis and its specific zones, including the Enterprise and Environment and Recreation zones.</p> <p>The Department has considered the development against the detailed controls in the DCP, and concludes the development is consistent with these controls.</p>
<p><b>IPG Master Plan</b></p>	<p>Section 4.42 of the Western Parkland City SEPP requires a consent authority to consider the IPG Master Plan prior to granting consent.</p> <p>The Department has considered the development against the IPG Master Plan and concludes the development is consistent with the relevant provisions of this document.</p>

# 4 Statutory Context

## 4.1 Permissibility and Assessment Pathway

Details of the permissibility of the development and the assessment pathway under which consent is sought are provided in **Table 5** below.

**Table 5** | Permissibility and Assessment pathway

Consideration	Description
<p><b>Permissibility</b></p>	<p><b>Permissible with consent</b></p> <ul style="list-style-type: none"> <li>• Under the Western Parkland City SEPP, the site is zoned Enterprise (ENT).</li> <li>• Industries and warehouse and distribution centres are permissible with consent in the ENT zone.</li> </ul>
<p><b>Assessment pathway</b></p>	<p><b>State significant development</b></p> <ul style="list-style-type: none"> <li>• The development is SSD under section 4.36 of the EP&amp;A Act as it satisfies the criteria under section 2.6(1) of the Planning Systems SEPP:               <ul style="list-style-type: none"> <li>– the development on the land concerned is not permissible without development consent, and</li> <li>– the development is specified in clause 12 of Schedule 1 of the Planning Systems SEPP.</li> </ul> </li> </ul>
<p><b>Consent authority</b></p>	<p><b>Minister for Planning and Public Spaces (Minister)</b></p> <ul style="list-style-type: none"> <li>• The Minister is the consent authority under section 4.5(a) of the EP&amp;A Act.</li> </ul>
<p><b>Decision-maker</b></p>	<p><b>Director</b></p> <ul style="list-style-type: none"> <li>• On 9 March 2022, the Minister delegated the functions to determine SSD applications to the Director, Industry Assessments where:               <ul style="list-style-type: none"> <li>– the relevant local council has not made an objection and</li> <li>– there are less than 15 unique public submissions in the nature of objections and</li> <li>– a political disclosure statement has not been made by the Applicant.</li> </ul> </li> </ul> <p>In total, the Department received no submissions from members of the community, one submission from the local council. Council did not object to the development. No reportable political donations were made by the Applicant in the last two years.</p> <p>Accordingly, the application can be determined by the A/Director, Industry Assessments, under delegation.</p>

## 4.2 Other Approvals and Authorisations

Should development consent be granted, other approvals may be required in order to carry out the development. Section 4.42 of the EP&A Act lists the approvals that cannot be refused if required to carry out the development and must be approved in a manner that is consistent with any SSD consent granted under the EP&A Act.

The development will require consent under the *Roads Act 1993* issued by Council for works carried out within the road reserve of Road 3, should this road be dedicated to Council prior to construction of the development.

The Environment Protection Authority (EPA) has also advised that an environment protection licence (EPL) is likely to be required under section 42 of the *Protection of the Environment Operations Act 1997* (POEO Act) as the volume of general chemicals storage at the development is likely to exceed the threshold of 2,000 tonnes.

The Department has consulted with and considered the advice of Council and the EPA in its assessment of the development (see **Section 5** and **Section 1**) and has incorporated Council and EPA's recommended conditions in the consent (see **Appendix D**).

## 4.3 Mandatory Matters for Consideration

Section 4.15 of the EP&A Act sets out matters to be considered by a consent authority when determining a development application (DA). The Department's consideration of these matters is shown in **Appendix C**.

## 4.4 Public Exhibition and Notification

In accordance with section 2.22 and Schedule 1 to the EP&A Act, the DA and any accompanying information of an SSD application are required to be publicly exhibited for at least 28 days. The application was on public exhibition from 30 May 2025 to 26 June 2025 (28 days). Details of the exhibition process and notifications are provided in **Section 5**.

## 4.5 Objects of the EP&A Act

In determining the application, the consent authority should consider whether the development is consistent with the relevant objects of the EP&A Act (section 1.3), including the principles of ecologically sustainable development (ESD). The Department has fully considered these matters in **Appendix C**. The Department is satisfied that the development is consistent with the objects of the EP&A Act and the principles of ESD.

## 4.6 Biodiversity Development Assessment Report

The entire development site is on land that is biodiversity certified under section 8.2 of the Biodiversity Conservation Act 2016 (BC Act). The biodiversity certification was established in 2010 under the former State Environmental Planning Policy (Sydney Region Growths Centres) 2006 (SRGC SEPP).

Therefore, in accordance with section 8.4(2) of the BC Act, a Biodiversity Development Assessment Report is not required.

Notwithstanding the biodiversity certification, a BDAR was undertaken as part of the IPG Master Plan assessment process and a Biodiversity Management Plan (BMP) was prepared. The Applicant has confirmed it would adopt relevant construction management and mitigation measures in the IPG BMP to ensure any potential off-site impacts on biodiversity are minimised during construction.

The SSD application was referred to the Conservation Programs and Heritage Regulation (CPHR) group of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) for comment. CPHR did not raise any concerns regarding the potential impacts of the development on biodiversity. The Department's consideration of the potential impact of the development on biodiversity values at the site is provided in **Section 1** of this report.

#### 4.7 Matters of National Environmental Significance

Under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), assessment and approval are required from the Australian Government if a development is likely to impact on a Matter of National Environmental Significance (MNES), as it is considered to be a 'controlled action'.

The EIS for the development confirmed that, on 28 February 2012, the Australian Government Minister for the Environment announced that the program of development activities within the Growth Centres was approved under the EPBC Act Strategic Assessment process. Specifically, all actions associated with the development of the Western Sydney Growth Centres as described in the Sydney Growth Centres Strategic Assessment Program Report (November 2010) have been assessed at the strategic level and approved in regard to their impact on MNES.

The Applicant concluded these decisions indicate that the Australian Government is satisfied that the conservation and development outcomes that will be achieved through the Western Sydney Growth Centres Program will satisfy their requirements for environmental protection under the EPBC Act. As such, the Applicant determined a referral to the Australian Government Department of Climate Change, Energy, the Environment and Water was not required.

# 5 Engagement

As required by the Planning Secretary's Environmental Assessment Requirements (SEARs), the Applicant undertook consultation with relevant local and State authorities as well as the community and affected landowners prior to lodgement of the EIS. The Department undertook further consultation with these stakeholders during the exhibition of the EIS and throughout the assessment of the application. These consultation activities are described in detail in the following sections.

## 5.1 Consultation by the Applicant

The Applicant undertook a range of consultation activities throughout the preparation of the EIS including letterbox drops of a project newsletter to 678 members of the surrounding community, emails to relevant government and community stakeholders, establishment of a project phone number and email address and invitation to enquire about the development.

Aboriginal stakeholders, including the Dharug Traditional Custodians and eleven Registered Aboriginal Parties (RAPs), were consulted as part of the engagement activities associated with the IPG Master Plan. This included a Walk on Country and Design Jam with the RAPs in 2022, a Community Session with the RAPs in 2023 and Community Endorsement Session with the RAPs in 2024.

The Applicant also consulted key government agencies including Sydney Water, to refine stormwater design aspects of the development.

## 5.2 Consultation by the Department

### 5.2.1 Public Exhibition of the EIS

After accepting the DA and EIS, the Department:

- publicly exhibited the DA and EIS from 30 May 2025 until 26 June 2025 on the NSW planning portal
- notified occupiers and landowners in the vicinity of the site about the public exhibition
- notified and invited comment from relevant government authorities and Council.

The Department undertook a site visit on 8 July 2025.

## 5.3 Submissions and Advice

During the public exhibition period, the Department received no public submissions, a submission from Liverpool City Council and advice from 14 government authorities, utility providers and State-owned corporations.

A summary of the submissions and government advice is provided below. A link to the full copy of the submissions and advice is provided in **Appendix B**.

### 5.3.1 Government Authority Advice

A summary of the State and Commonwealth government authority advice is provided in **Table 6** and **Table 7** below.

**Table 6** | Summary of Government Authority Advice

Agency	Advice summary
Bradfield Development Authority (BDA)	<p>Noted the development is dependent on the final assessment and approval of the IPG Master Plan and requested the Applicant identify and resolve the relationship of the development with the timing of the delivery of the IPG Master Plan.</p> <p>Advise the development must remain in line with the objectives of the WSA DCP and requirements of Sydney Water to provide integrated stormwater management for the Aerotropolis Core Precinct.</p>
Water Group of the Department of Climate Change, Energy, the Environment and Water (DCCEEW-Water)	<p>Requested the Applicant:</p> <ul style="list-style-type: none"> <li>- quantify the maximum construction water demands and clarify access to a viable and appropriately licensed water source</li> <li>- clarify the potential for groundwater interception, and should this be required, quantify the maximum annual volume of water take due to aquifer interference activities</li> <li>- demonstrate the ability to acquire sufficient water entitlement to account for water take, unless an exemption applies, or demonstrate aquifer interference will not occur.</li> </ul>
Conservation Programs and Heritage Regulation Group of DCCEEW (CPHR)	<p>Noted the IPG Master Plan had not been approved and requested the Applicant provide additional information:</p> <ul style="list-style-type: none"> <li>- to demonstrate compliance with the Wianamatta–South Creek waterway health targets in accordance with the <i>Technical guidance for achieving Wianamatta–South Creek stormwater management targets (2022)</i></li> <li>- to assess flood risks, including a flood impact risk assessment (FIRA).</li> </ul>
DCCEEW – Heritage NSW	<p>Noted the Aboriginal Cultural Heritage Assessment Report (ACHAR) submitted with the EIS was prepared for the broader IPG Master Plan application, and requested the following additional information to determine if the ACHAR provides sufficient information to support the ALDI DA:</p> <ul style="list-style-type: none"> <li>- updated mapping of survey results to confirm the efficacy of the survey coverage</li> <li>- mapping that confirms the location of the Aboriginal Heritage Information Management System (AHIMS) site 45-5-2674 is outside the ALDI development footprint</li> <li>- evidence and documentation relating to the Aboriginal community consultation process</li> </ul>

Agency	Advice summary
	<ul style="list-style-type: none"> <li>- a short summary of how the ACHAR has considered and meets the <i>Recognise Country Guidelines for development of the Aerotropolis</i>.</li> </ul>
Department of Primary Industries and Regional Development – Agriculture (DPIRD – Ag)	<p>Advised the potential for land use conflicts with agricultural uses exists and requested a Land Use Conflict Risk Assessment be carried out, including direct consultation with nearby agricultural businesses, particularly local horticultural operations.</p> <p>Noted the landscaping proposed but recommended a suite of general design principles be implemented in the landscaping design to improve the effectiveness of the vegetated buffers as riparian buffers, for dust and odour suppression and visual amenity.</p>
Environment Protection Authority (EPA)	<p>Advised an environment protection licence (EPL) would be required for the development as the volume of dangerous goods (DGs) stored and handled at the site would exceed the threshold of 2,000 tonnes for chemical storage under the <i>Protection of the Environment Operations Act 1997 (POEO Act)</i>.</p> <p>Requested additional information on:</p> <ul style="list-style-type: none"> <li>- chemical storage and handling arrangements, including total storage volumes, and the ventilation and refrigeration systems</li> <li>- the assessment of operational noise impacts on residential receivers and the implementation of the <i>Noise Policy for Industry (EPA, 2017) (NPfI)</i>.</li> </ul> <p>Recommended conditions regarding waste management, DGs, surface water management, air quality, fire and emergency response, bunding and fuel storage.</p>
Fire and Rescue NSW (FRNSW)	<p>Recommended conditions requiring the preparation of a Fire Safety Study, Emergency Plan and Emergency Services Information Package, compliance with the <i>FRNSW Fire safety guideline – Access for fire brigade vehicles</i>, provision of a suitable water supply for fire-fighting purposes and implementation of Australian Standards for the installation of fire hydrants.</p>
Rural Fire Service (RFS)	<p>Noted the Bush Fire Assessment Report prepared for the IPG Master Plan and requested a project-specific bush fire report for the development that outlines the bush fire protection measures required for the ALDI warehouse building.</p>
Transport for NSW (TfNSW)	<p>Requested the Applicant:</p> <ul style="list-style-type: none"> <li>- discuss the design of the Eastern Ring Road (ERR) with TfNSW prior to lodgement of its Submissions Report to ensure the design of the ERR aligns with the development, and recommended the development not have any structures within 20 metre setbacks from the road boundary as shown in the WSA DCP</li> </ul>

Agency	Advice summary
	<ul style="list-style-type: none"> <li>- provide a Traffic Warrants Assessment, concept design, swept paths, SIDRA modelling and demonstrate alignment with the TfNSW future network alignment for any proposed traffic control signals, and consult with TfNSW prior to lodgement of the Submissions Report</li> <li>- carry out a traffic impact assessment for the interim (base case with development) operational scenario (noted the IPG Master Plan Transport Management and Accessibility Plan (TMAP) only assessed the development with the network peak periods for the 2041 modelling year)</li> <li>- provide further justification for the estimated hourly traffic generation.</li> </ul>

The following agencies raised no concerns or provided no comment:

- Safework NSW.

**Table 7 | Summary of Commonwealth Government Authority Advice**

Agency	Advice summary
AirServices Australia	Advised the development would not impact AirServices operations or facilities at the Western Sydney International (WSI) airport.
Civil Aviation Safety Authority (CASA)	Advised the development will not be a hazard to aircraft operations, however, cranes used during construction will infringe the prescribed airspace for the WSI airport and will require approval from the Australian Government Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCA).
Western Sydney International Airport (WSI Airport)	<p>Noted the development was an acceptable use between the 20 and 25 Australian Noise Exposure Forecast (ANEF) contours of the WSI Airport, was in the six km lighting intensity radius, and below the Obstacle Limitation Surface (OLS).</p> <p>Recommended the Applicant obtain approval under the <i>Airports Act 1996</i> and the <i>Airports (Protection of Airspace) Regulations 1996</i> Regulations if any construction equipment would result in an impact on the prescribed airspace.</p>

### 5.3.2 State Owned Corporation Advice

**Sydney Water** advised it could not support the development on the basis of matters relating to stormwater and requested additional information for assessment, including:

- insufficient certainty and resolution of the design of regional stormwater basins
- demonstration, including design details, of how the development would connect to the regional recycled water scheme when available

- resolution of inconsistencies between the ALDI ADC and IPG Master Plan civil drawings to ensure integration and functionality of on-site drainage and off-site drainage infrastructure, including surface levels, drainage pipe details and Sydney Water access basin access designs
- insufficient information to demonstrate Wianamatta-South Creek waterway health targets can be met during the interim phase, prior to operation of the regional stormwater scheme
- insufficient information regarding on-site detention infrastructure, including the timing of the delivery of any off-site detention infrastructure within the IPG Master Plan Estate
- insufficient information to demonstrate minimum pervious area targets have been met
- incorrect references to Sydney Water acquisition obligations.

### 5.3.3 Utility Providers

**Endeavour Energy** did not raise any concerns and provided a copy of its *Standard Conditions for Development Applications and Planning Proposals (2025)* for consideration.

### 5.3.4 Key Issues – Council(s)

**Council** did not object to the development but noted the lodgement of the ALDI DA prior to finalisation and approval of the IPG Master Plan creates a significant level of uncertainty in relation to the assessment. Council recommended the DA be assessed in accordance with the existing strategic and statutory planning framework in lieu of the IPG Master Plan being approved.

Council requested the Applicant demonstrate how the proposal will provide a logical and safe regional connection to the broader road, pedestrian and active transport network, and provide additional information that demonstrates how the proposal complies with the blue-green infrastructure framework and what interim arrangements will be provided prior to delivery of the broader regional basin network. Additional information was also requested regarding the assessment of impacts on Aboriginal cultural heritage, worker facilities and contributions, including a cost summary report. Council also requested further consideration of Country in the design of the development and the public art strategy.

Council noted the contamination investigations and reports and recommended the consent authority consider if the requirements under the Resilience and Hazards SEPP have been met in relation to contamination and remediation. Noting the site is currently within an un-sewered area, Council recommended the Department consider site suitability. Council raised several queries regarding traffic and the proposed enabling works and delivery timeframes for supporting transport infrastructure for the development.

Conditions were recommended regarding stormwater management (including the provision of interim measures to manage stormwater quality until the regional water quality basin network is established), traffic management, construction traffic and environmental management, vehicle refuelling and

chemical storage, landscaping and the provision of a Forecourt Management Plan and an Operational Environmental Management Plan.

## 5.4 Submissions Report

Following the public exhibition period, the Department requested the Applicant respond to the issues raised in Council's submission and the advice received from government agencies. On 14 July 2025, the Department also requested additional information regarding infrastructure delivery, orderly development, interim stormwater arrangements, contributions, hazard and risk, design quality, visual impacts, traffic impacts, noise, fire safety, land use conflict and Aboriginal cultural heritage.

On 27 October 2025, the Applicant provided a Submissions Report to the Department (see **Appendix A**). The Department published the Submissions Report on the NSW planning portal and forwarded the Submissions Report to relevant government authorities and Council for comment.

The Submissions Report included updated assessments of visual impacts, hazard and risk, noise and vibration, traffic and access impacts, bushfire and land use conflicts. Updated development design drawings, including architectural plans, landscape plans and civil drawings were also provided. These drawings were supported by updated versions of the Civil Report and Design Verification Report as well as additional information on infrastructure delivery, compliance with the approved IPG Master Plan, impacts on Aboriginal cultural heritage (including a Recognise Country Guideline Template) and an updated versions of the Statutory Compliance table and Mitigation Measures table.

A summary of the government authority and State Corporation responses is provided below. The following agencies reiterated their requests for additional information:

- **Council** reiterated its concerns and need for further information to confirm the timely delivery of supporting infrastructure, including roads, active transport and public transport connections and consistency with the requirements of the WSAPP. Council also reiterated its request for further information to demonstrate both water quality and quantity targets can be met, and provided recommended conditions regarding stormwater, traffic, contributions and public art.
- **CPHR** reiterated its previous advice that insufficient information had been provided to demonstrate compliance with the Wianamatta-South Creek waterway health targets.
- **DPIRD-Ag** reiterated its request for further consideration of potential biosecurity risks and traffic and dust impacts during construction and noted the Applicant's commitment to prepare and implement a Construction Traffic Management Plan (CTMP).
- **EPA** reiterated the development is likely to need an EPL and recommended a revised assessment of noise in accordance with the NPfI. Conditions were also recommended requiring an Operational Environmental Management Plan, a Dangerous Goods and Hazardous Chemicals Management Plan, a DG inventory list, and appropriate waste storage and disposal,

including for hazardous waste. The need for a DG Transport Licence from the EPA was also noted.

- **Heritage NSW (ACH)** reiterated its request for additional community consultation information to demonstrate appropriate consultation with the RAPs had been carried out.
- **Sydney Water** reiterated its request for an appropriate level of design resolution on the regional stormwater basins (i.e. functional design), resolution of civil drawing design inconsistencies and demonstration of interim waterway health target compliance.

The following organisations did not raise any further concerns:

- **BDA noted** the approval of the IPG Master Plan, suitability of supporting road infrastructure, ongoing discussions between the Applicant and Council regarding the delivery of road infrastructure and progress of the delivery of stormwater infrastructure.
- **DCCEEW – Water** advised all requirements had been adequately addressed.
- **RFS** advised the recommendations of the updated bushfire assessment were supported.
- **TfNSW** recommended conditions requiring a Green Travel Plan and Construction Pedestrian Traffic Management Plan.

## 5.5 Additional Information

Given the residual issues raised by government authorities on infrastructure delivery, stormwater design and waterway health, noise, Aboriginal cultural heritage and public art, on 19 November 2025, the Department requested the Applicant provide additional information to respond to these matters. On 9 December 2025, the Department facilitated a meeting between the Applicant, Sydney Water and CPHR to discuss and clarify the request for information regarding the stormwater management strategy, including the design details and information required to demonstrate the interim waterway health targets could be met.

On 19 December 2025, the Applicant provided additional information to address the residual outstanding concerns. This was referred to the relevant government authorities and published on the NSW planning portal. On 22 January 2026, CPHR advised it was still not satisfied with the information provided, and subsequently, on 5 February 2026, the Applicant submitted additional information to address CPHR's concerns. Following review of this information, CPHR did not raise any further concerns. On 11 February 2026, Sydney Water advised it was satisfied with the additional information, subject to conditions.

Despite the additional information, Council maintained its concerns regarding the delivery of WSAPP compliant infrastructure and reiterated its recommended conditions.

# 6 Assessment

The Department has considered the EIS, the issues raised in submissions, the Applicant's Submissions Report and Additional Information in its assessment of the development. The Department considers the key assessment issues are:

- traffic and access
- stormwater management and waterway health
- noise.

A number of other issues have also been considered. These issues are considered relatively minor and are assessed in **Table 9** in **Section 6.4** below.

## 6.1 Traffic and Access

To assess impacts of the development on the safety and efficiency of the surrounding road network, the Applicant prepared a Transport Assessment in accordance with the relevant TfNSW guidance. In response to issues raised by the Department, TfNSW and Council, regarding traffic generation and the design and timing of access arrangements, the Applicant revised its Transport Assessment on two occasions. The revised Transport Assessment confirmed that all roads within the IPG Master Plan Estate and external road upgrades required for construction and interim operational access to the development would be delivered by IPG under separate planning applications as part of the delivery of the IPG Master Plan Estate access requirements.

A draft Construction Traffic Management Plan (CTMP) and Preliminary Green Travel Plan (GTP) were also submitted with the Transport Assessment to demonstrate how construction traffic would be managed, and how employee operational traffic would be minimised, respectively.

### 6.1.1 Access

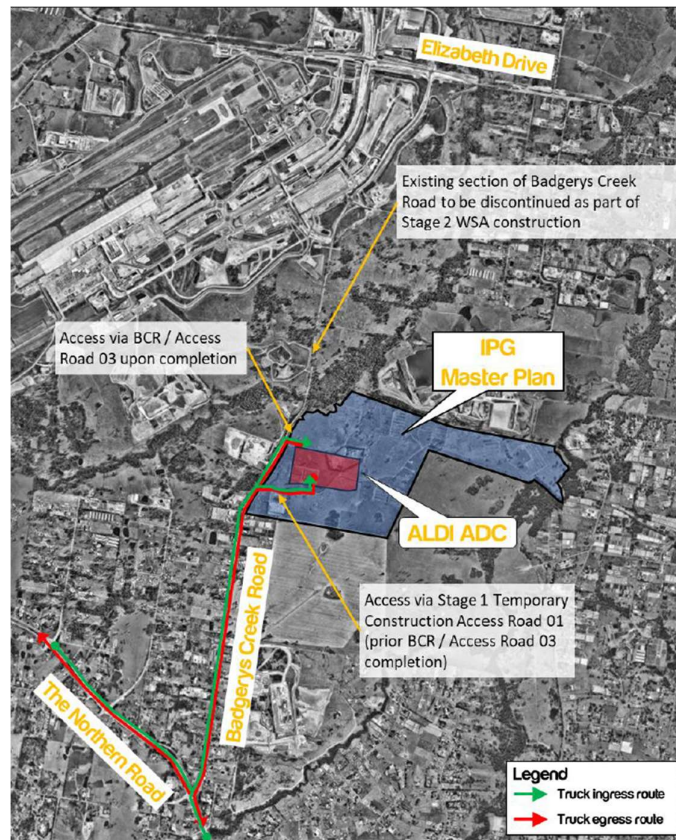
#### Applicant's Assessment

The revised Transport Assessment confirmed that operational access is reliant on IPG's delivery of interim and ultimate site access arrangements as part of the overall IPG Master Plan delivery sequencing. The Master Plan is to be delivered over seven stages, including the staged delivery of internal estate roads (refer **Figure 15**), with external road upgrades to be delivered over four stages. For the ALDI ADC, Road 3 is the only internal estate road required. External road upgrades required for operational access are as follows:

- Interim access: IPG Sequence 03, including BCR / Elizabeth Drive upgrade to a signalised intersection, and pavement structural upgrade works of BCR, as required, to make fit for purpose for heavy vehicle movements

- Ultimate access: IPG Sequence 04, including BCR upgrade north of ERR (single lane each direction) and south of ERR (four lanes), ERR (between BCR and Elizabeth Drive) and Fifteenth Avenue (west) and Bradfield Metro Link Road

Construction traffic will access the site from The Northern Road via BCR and a temporary haul road into the site. Upon completion of Road 3, construction access will also be facilitated via the roundabout intersection of BCR and Road 3 (refer **Figure 17**).



**Figure 17 | Construction Traffic Access Arrangements**

The Applicant has confirmed the development will not commence operation until the roadworks associated with IPG Sequence 03 have been completed. The interim access arrangements will be in place until all other external road upgrades are delivered by TfNSW following receipt of contributions under the Western Sydney Aerotropolis Special Infrastructure Contribution (SIC) from developments across the wider Aerotropolis. At this stage, a timeframe of 2040 for construction completion of these upgrades, subject to funding, are anticipated in accordance with the Aerotropolis Sector Plan 2025. Ultimately, the ERR will become the main access for the development.

Government Authority Advice

TfNSW did not raise any concerns with the proposed access arrangements and confirmed it would be carrying out pavement structural upgrade works along 5.5 km of BCR as part of a broader project to support bus and heavy vehicle movements along this route. This work is anticipated to commence at the end of February 2026 and be completed by the end of 2026. TfNSW also advised the entire stretch

of BCR is an approved route for 26 m B-Doubles, and the pavement resurfacing has been designed for a 10-year design life to accommodate heavy vehicles including B-Doubles. Additionally, the construction methodology for this work has reviewed contra flow lane width to allow B-Double trucks to use BCR during construction. TfNSW also recommended conditions requiring a Construction Pedestrian and Traffic Management Plan.

Council maintained its concern the development would not provide a WSAPP compliant connection to the broader regional road infrastructure with respect to vehicular, pedestrian, active transport and public transport access to the site. Council also reiterated concerns regarding the safety of site access design arrangements to Road 3 and the adequacy of the BCR pavement for heavy vehicle movements. Council recommended Road 3 incorporates a raised central median island and a temporary U-turn facility to minimise the risk of potential vehicle conflict at the proposed access driveways, noting their alignment with proposed Road 02 intersections (refer **Figure 15**).

#### Department's Assessment

The Department is satisfied the Applicant has provided sufficient information to demonstrate that essential road infrastructure will be available to support construction and operation of the development. However, as the necessary road infrastructure for construction and interim operational access is to be delivered by IPG under separate planning pathways, the Department has recommended conditions requiring the Applicant to submit evidence to the satisfaction of the Planning Secretary that the necessary road upgrades have been completed and operational prior to the commencement of construction and operational stages of the development. The Department considers this is appropriate having regard to the need for the consent authority to consider how the development will promote the orderly delivery of land and be supported by the required infrastructure, as required under the objects of the EP&A Act, the aims in Chapter 4 of the Western Parkland City SEPP and the WSAPP.

The Applicant's draft CTMP provides a satisfactory outline of the proposed construction traffic and access arrangements for the development, however, the Department has recommended a more detailed CTMP be prepared prior to the commencement of construction that provides a more contemporary consideration of the development's interaction with other development projects in the area, including infrastructure delivery and road upgrades being carried out by IPG and/or TfNSW, and any existing horticultural and agricultural businesses. This will ensure appropriate traffic control measures are implemented to protect the safety of other road users and support network efficiency when construction commences.

In regard to Council's concerns about the potential for conflicts at the site access driveways, the Department does not consider it appropriate to require the Applicant to install central median islands along this road, as the design of Road 3, a 25.6 m wide collector road, is the subject of a separate CDC application by IPG to be determined by Council. As such, the design of this road is to be resolved through the CDC application having regard to the approved Master Plan. The Department notes the

design of the local road network within the IPG Master Plan was assessed and approved, including concept civil design of these roads. The approved IPG Civil Report confirms the proposed local road network has been designed to service the intended land use around the estate, being large-format industrial and logistics facilities. Heavy vehicles are expected to comprise a significant proportion of the traffic around the site with the road geometry being tested for vehicles up to 36.5m long B-Triples in accordance with the DCP and TfNSW requirements. Median islands were not proposed along Road 3 as part of the IPG Master Plan design.

Further consultation by the Department with Council regarding the ongoing maintenance of the pavement of BCR, beyond the 10-year design life proposed by the TfNSW works, confirmed there is an ongoing maintenance funding agreement between Council and TfNSW for the management and maintenance of BCR, which would continue to apply beyond the initial 10-year period. Notwithstanding, the Department has recommended standard conditions requiring the Applicant to prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site, including the pavement of BCR between the BCR / Road 3 intersection and The Northern Road. Unless the Applicant and the applicable authority agree otherwise, the Applicant must repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development.

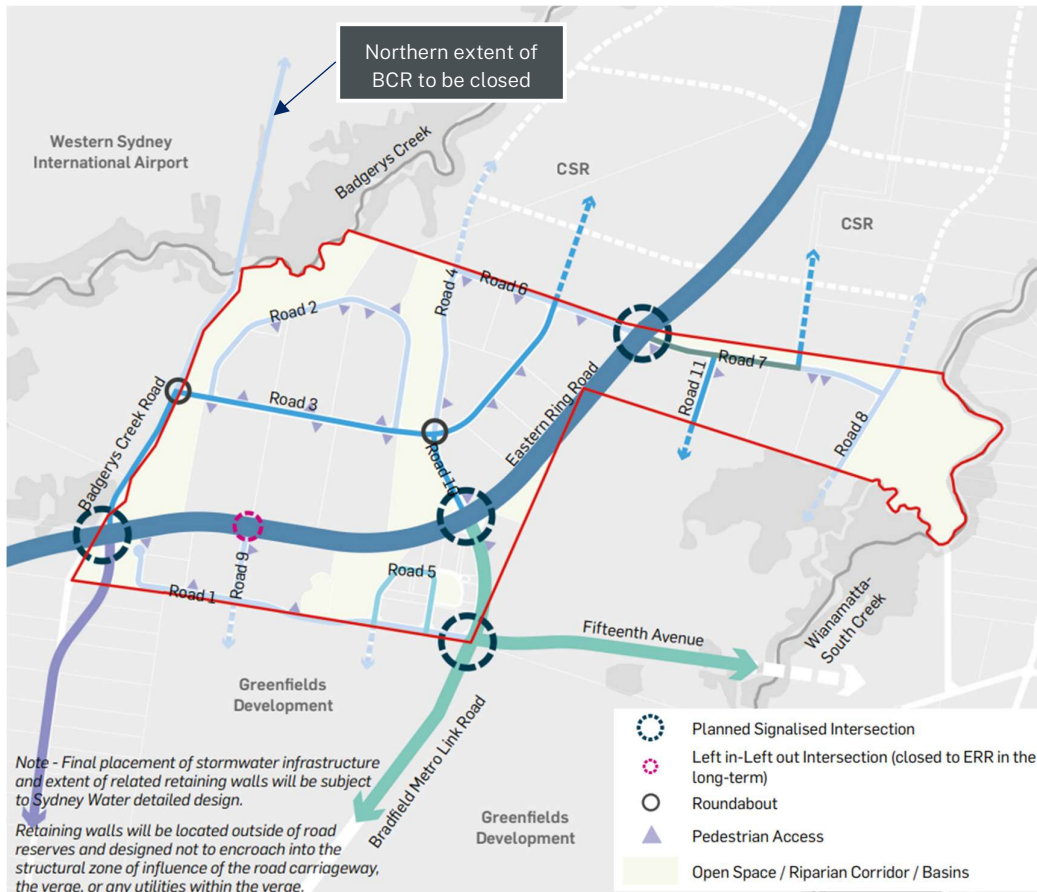
Conditions also require each of the proposed access driveways to be designed to the satisfaction of the relevant roads authority (being Council for Road 3) and accommodate the turning path of a 36.5 m A-double, which is the largest vehicle anticipated to access the development. Approval is required from the relevant roads authority under section 138 of the *Roads Act 1993* for these works.

The Department is satisfied the recommended conditions will ensure appropriate and timely site access arrangements can be provided for construction and operation of the development, consistent with the approval IPG Master Plan, the design requirements of the WSA DCP, Austroads, and Australian Standards. The Department's assessment concludes the site access arrangements during construction and operation are satisfactory, subject to the implementation of the recommended conditions of consent.

### **6.1.2 Operational Traffic**

Traffic growth and distribution throughout the Aerotropolis will change significantly as the area develops over time. Significant investment in major transport infrastructure is planned for the area and construction is currently underway on the M12 Motorway north of the site. Upgrades are also planned for Elizabeth Drive, with a 2 km section recently widened and a signalised intersection completed with BCR, which is required to support the ALDI ADC development. The future Eastern Ring Road (ERR), to be delivered by TfNSW, will provide a north-south arterial road between Elizabeth Drive to the north and The Northern Road to the south. This will become the key access road for the development. Construction timeframes are not known, however, indicative forecasts are for construction to be completed by 2040.

In the short to medium term, interim and safety access works are to be carried along the full length of the BCR corridor. In the longer term (earmarked as a priority for 2040), BCR is also planned to be upgraded to a 40 m wide sub-arterial road south of the ERR and the construction of a new signalised intersection with BCR. These works will involve the closure of the northern section of this road to allow for the second runway of the WSI Airport. An overview of the proposed key enabling infrastructure around the site and IPG Master Plan is provided below in **Figure 18**.



**Figure 18 | Ultimate Aerotropolis Road Network Plan**

Applicant’s Assessment

The approved IPG Master Plan Transport Management and Accessibility Plan (TMAP) included traffic modelling to estimate the maximum volume of traffic predicted for each development lot. To ensure the development traffic would not exceed the traffic generation predictions carried out in the TMAP, the Applicant compared the ALDI ADC traffic generation predictions against the traffic predictions for the equivalent lots associated with the Master Plan traffic modelling. A first principles assessment approach was adopted. Additionally, to ensure the comparison was conservative, and noting the higher composition of heavy vehicles expected to be accessing the development, a passenger car equivalent (PCE) factor of 2.9 was adopted for HV movements. As required by TfNSW, the analysis included a scenario based on the existing network peak (first operations) and the network peak for

the ultimate IPG Master Plan development (future land uses). The traffic generation comparison is outlined in **Table 8** below.

**Table 8 | Traffic Generation Comparison**

<b>First Operations (current land uses)</b>		
<b>Network Peak</b>	<b>Approved Lots (PCE)</b>	<b>ALDI ADC (PCE)</b>
AM – 7.45am – 8.45am	403 veh/hr	400 veh/hr
PM – 2.45pm – 3.45pm	447 veh/hr	368 veh/hr
<b>Ultimate Master Plan (2041) (future land uses)</b>		
AM – 8.00am – 9.00am	365 veh/hr	362 veh/hr
PM – 3.30pm – 4.30pm	359 veh/hr	358 veh/hr

The Applicant’s assessment predicted a total of 1,990 vehicles daily (1,068 HV and 922 LV). Based on the Applicant’s conservative assessment for the AM and PM network peak periods, the Applicant concluded the proposal is not expected to result in any adverse impact to the external road network when compared to traffic generation estimated as part of the Master Plan TMAP for the same lots and is supportable from a traffic perspective.

In terms of active transport, there is currently no formalised pedestrian or cycling infrastructure within the vicinity of the proposal. The Applicant noted Council’s concerns regarding a WSAPP compliant active transport network and the lack of connection to the broader regional road network. In response, the Applicant advised that it was considered premature to build ‘ultimate’ active transport connections within BCR until such time the final upgrade of this road is carried out by TfNSW. Notwithstanding, the Applicant prepared a Preliminary Green Travel Plan to promote the use of active transport modes (i.e. walking and cycling) and the provision of active transport facilities to support the progressive development of active transport linkages across the Aerotropolis in conjunction with the proposed road upgrades.

Government Authority Advice

TfNSW did not raise any concerns regarding operational traffic and recommended the Applicant be required to prepare a Green Travel Plan and Travel Access Guide.

Council sought additional information on traffic generation, parking provision and on-site queuing and recommended a suite of conditions including requirements for a Travel Access Guide, and an Operational Traffic Management Plan.

Department’s Assessment

The Department is satisfied the Applicant has provided a conservative assessment of predicted traffic volumes associated with development operations. The comparison with the approved traffic volumes confirms the development will remain within the traffic generation estimates in the approved IPG

TMAP. Therefore, with the site access upgrades outlined in Section 6.1.1 above, the traffic modelling analysis indicates the broader road network can support the development.

Council's request for additional information is noted, however, the Department is satisfied the Applicant's assessment of traffic generation is satisfactory and has been accepted by TfNSW and is in line with the approved IPG Master Plan TMAP. The Applicant's assessment is conservative and based on a first principles approach and confirms that sufficient network and intersection capacity is available from first operations subject to the completion of the BCR / Road 3 roundabout. In relation to queuing, a queuing assessment was carried out as part of the Transport Assessment and swept path analysis, which confirmed there would be sufficient on-site queuing areas on site for the anticipated combination of HVs at the site peak period.

Conditions are recommended to ensure vehicle movements associated with site operations do not have any adverse impacts on the surrounding roads. This includes requiring all internal roads, driveways and parking to be constructed and maintained in accordance with Australian Standards, ensuring the development does not result in vehicles queuing or parking on the public road network, vehicles are wholly contained within the site before being required to stop and all turning areas are clear of obstacles at all times.

To reduce car use and increase public and active transport, the Department concurs with the advice from TfNSW and Council to require the Applicant to prepare a detailed Green Travel Plan, which includes a Travel Access Guide. In relation to the provision of active transport links between the development and the broader regional road network, the Department agrees with the Applicant's views that it is premature to construct interim active transport links ahead of the planned upgrade of BCR. The Department also notes the approved IPG Master Plan includes an Active Transport Strategy across the Master Plan Estate which will provide an interconnected pedestrian-oriented network to maximise site accessibility. This will include active transport links along riparian corridors and open spaces. Road 3, and the BCR/Road 3 roundabout will incorporate active transport infrastructure, including footpaths, shared paths and the provision of a local bus corridor and bus stops (on Road 3). These works will be carried out when these roads are delivered by IPG under separate approvals.

Overall, the Department is satisfied the Applicant's assessment has demonstrated traffic generated by the development will not create adverse impacts on the safety and efficiency of the surrounding road network. Appropriate provision has been made for on-site operational efficiencies with regard to queuing as well as manoeuvrability through the site. The Department's assessment concludes the development can be adequately accommodated on the road network in the short and long term.

## 6.2 Stormwater Management and Waterway Health

Development in the Aerotropolis is required to demonstrate compliance with the stormwater quality and flow targets in the DCP and the *Technical Guidance for achieving Wianamatta-South Creek stormwater management targets* (DPE, 2022) (the Technical Guidance). Ultimately, Sydney Water's planned regional stormwater infrastructure will service development lots, however until the scheme

is operational, each development must provide interim measures to manage water on site to comply with the targets during both construction and operation of development.

Extensive consultation was undertaken with Sydney Water and CPHR regarding the interim stormwater strategy. This included detailed reviews of the modelling, refinements to the design to ensure all targets would be met and consideration of how the development would integrate with Sydney Water's regional basins, which are to be delivered by IPG under Part 5 approvals on behalf of Sydney Water. The Department and Council also requested the Applicant provide additional information to demonstrate the waterway health targets and stormwater detention requirements could be met.

To sufficiently demonstrate the waterway health targets would be met and address the outstanding concerns of CPHR, Sydney Water, Council and the Department, the Civil Report, which included a Water Cycle Management Strategy (WCMS), civil drawings, and MUSIC water quality modelling were amended on two occasions. The revised Civil Report assessed the impact of stormwater discharged from the site during construction, as well as the interim operational scenario in which ALDI commences operation prior to the full development of the IPG Master Plan and prior to the commencement of operation of the Sydney Water regional stormwater system (including rainwater harvesting and irrigation).

The revised Civil Report confirmed the proposed erosion and sediment control measures, and management and treatment of water quantity and water quality discharged from the site would meet the requirements of the WSA DCP and the Technical Guidance during construction and the interim and ultimate operational stormwater scenario.

#### Government Authority Advice

Following its review of the final revised WCMS, Civil Report and MUSIC modelling submitted by the Applicant, CPHR advised it had no further comments on the application.

Similarly, Sydney Water confirmed it was satisfied with the information provided, and recommended conditions requiring a section 73 Compliance Certificate, building plan approval, and plans to demonstrate that the final design of the stormwater management system would integrate with the regional stormwater basin designs. Sydney Water recommended that construction not begin until the temporary sediment basins and other relevant IPG Master Plan Estate erosion and sediment controls are installed and operational, and that operations not commence until the necessary stormwater detention infrastructure is fully constructed and functional.

Council recommended that development consent not be issued until regional detention infrastructure necessary for stormwater and flood management is constructed and operational.

#### Department's Assessment

The Department acknowledges that the development relies on the IPG Master Plan Estate stormwater management system to be delivered by IPG under other planning assessment pathways (Part 4 and

Part 5 of the EP&A Act). While approvals have been issued for the Stage 1 bulk earthworks providing benched development pad, stormwater infrastructure and temporary sediment basins, applications for the Sydney Water regional basins (Basin M02/M03A, Basin M03A and Basin M06) are still under consideration by Sydney Water. As such, the design of the regional basins is still yet to be finalised. Additionally, approval has not yet been given for the regional stormwater detention strategy, which involves a series of on-line detention basins within an area of open space to the east of the site, within the IPG Master Plan Estate.

Having regard to the objects of the EP&A Act, the aims in Chapter 4 of the Western Parkland City SEPP and the WSAPP, and the need for the orderly development of land, the Department has recommended conditions preventing construction from commencing until the required temporary sediment basins are established and operational. Likewise, operation cannot commence until the off-site regional stormwater treatment and detention basins relied upon to manage stormwater discharges from the development are approved, constructed and operational. These conditions address the concerns of Council and Sydney Water regarding the timing of the delivery of this infrastructure. The Applicant has accepted these conditions.

Given the detailed analysis of stormwater discharge quality and quantity against the WSA DCP and Technical Guidance requirements provided in the Applicant's updated Civil Report, and the advice from government stakeholders, the Department considers the development can meet the waterway health targets, subject to the establishment of the off-site stormwater management measures, to be delivered by IPG. In accordance with the requirements of the Western Parkland City SEPP and the WSAPP, the Department is satisfied the necessary stormwater infrastructure will be available when required for the development.

Noting the advice from Sydney Water regarding the ongoing design refinements of the regional basins and IPG Master Plan Estate stormwater system, there is a need to ensure the final design of the stormwater system for the development integrates with the off-site infrastructure. Conditions are therefore recommended requiring the Applicant to finalise the detailed design of the stormwater management system in consultation with Sydney Water, Council and CPHR, to detail all drainage infrastructure within the site including any connections to adjacent landholdings and demonstrate integration between the site discharge points and receiving stormwater infrastructure.

The Applicant is also required to prepare and implement a detailed Water and Stormwater Management Plan (WSMP) consistent with the requirements of the Technical Guidance that provides details of the final approved stormwater management system, an operation and maintenance plan and detailed landscape drawings. The WSMP must detail triggers for a review of the plan, including a review of the plan within six months of the regional stormwater scheme being available for the site to connect to.

The Department's assessment concludes the development would comply with the stormwater and waterway health targets for Wianamatta – South Creek as required by the WSAPP and the Technical

Guidance and the proposed stormwater management system will ensure the ecological integrity and Aboriginal cultural heritage values of this waterway are protected.

### 6.3 Noise

Land uses surrounding the site are in transition as large areas of rural residential land have now been rezoned under the Western Parkland City SEPP to more intensive higher order employment-focused industries, as envisaged under the WSAPP. In the short to medium term, however, a number of existing residential receivers will remain and may be impacted from noisy activities associated with more intensive developments, such the ALDI ADC proposal. The development would generate industrial and traffic noise 24 hours a day. Throughout the assessment, the EPA maintained concerns regarding noise impacts on the residences within the ENT zoned land.

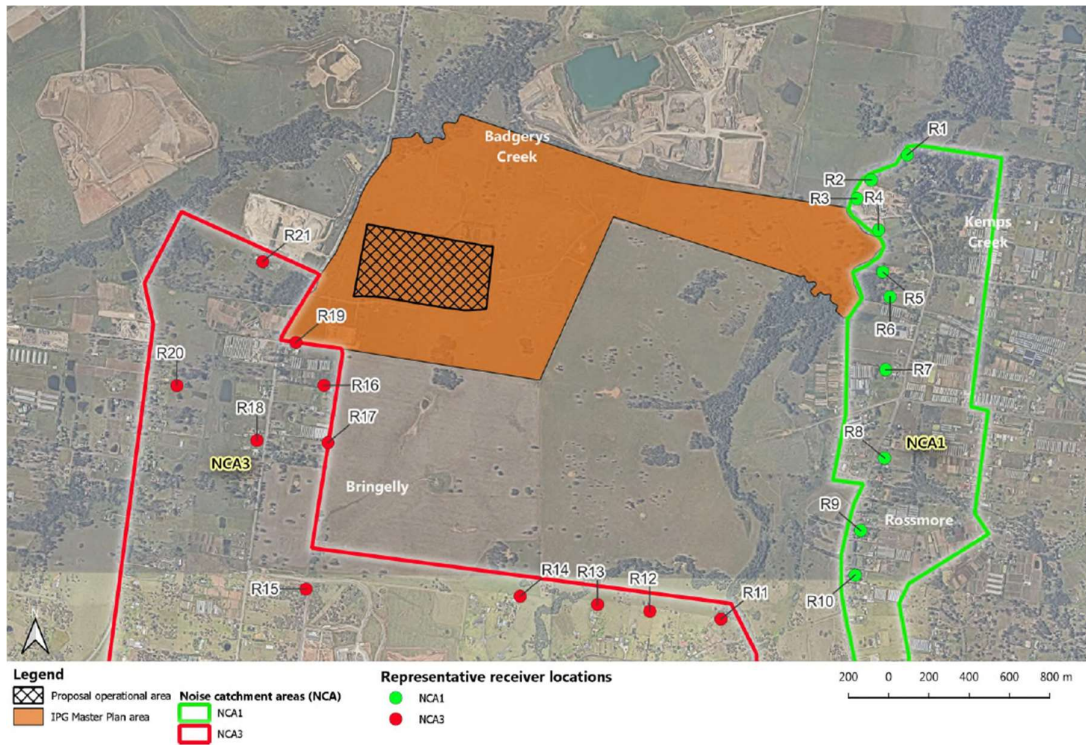
As noted in **Figure 5** of this report, the nearest residences are approximately 400 m from the site to the south and southwest, in Bradfield, in the ENT zone, many located along BCR. Background noise levels are typical of a semi-rural environment but are affected by road traffic noise and will soon be affected by aircraft noise.

In response to concerns raised by the Department and EPA regarding the assessment of emergency plant, maximum noise events and cumulative construction impacts, the Applicant's Noise and Vibration Impact Assessment (NVIA) was amended on one occasion. The revised NVIA did not address concerns raised by the EPA regarding the assessment of noise impacts on rural residences within the Enterprise zoned land and consistency with the requirements of the NPfI.

#### Applicant's Assessment

The NVIA assessed noise impacts on three residential noise catchment areas (NCA), identified as NCA1 (existing residential in Rossmore and Kemps Creek approximately 1,800 m east), NCA2 (proposed mixed use residential identified in the WSAPP approximately 650 m southeast), and NCA3 (existing isolated rural residential in Bradfield within the ENT zoned land, approximately 400 m south / southwest).

Representative assessment locations were adopted within each NCA for the assessment, consistent with the noise assessment carried out for the approved IPG Master Plan. Additionally, to maintain consistency with the approved Master Plan, the NVIA adopted the commercial amenity criteria for the isolated rural residences in NCA3 on the basis that this area would transition to higher order land uses in line with the Enterprise zoning now applicable to the land. This resulted in a project noise trigger level (PNTL) of  $L_{Aeq,15min}$  57dB(A) for the day, evening and night period for NCA3, being significantly higher than the PNTLs adopted for the residential areas in NCA1, being  $L_{Aeq,15min}$  42dB(A), 37dB(A) and 32dB(A) for the day, evening and night periods, respectively. Noise impacts at NCA1 and NCA3 were predicted for the short to medium term situation, and for NCA1 and NCA2 for the long-term situation.



**Figure 19 | Location of Noise Catchment Areas NCA1 and NCA3**

Reasonable worst case assessment scenarios were adopted for all operational activities associated with the development to predict noise impacts at each assessment location. With the adoption of all feasible and reasonable noise mitigation and management measures, the NVIA predicted that the PNTLs can be achieved at all receptors during operation and during testing and maintenance of emergency plant and equipment. The NVIA recommended that noise compliance measurements be conducted once operations commence to verify noise predictions and the effectiveness of the proposed mitigation measures.

In terms of road traffic noise, the NVIA concluded that cumulative road traffic noise along arterial roads will need to be considered as part of the proposed new road designs and road upgrades for the WSA road network, and not for any one project in isolation. Therefore, no specific consideration of road traffic noise for the proposed was carried out in the NVIA.

Construction noise impacts were predicted and assessed against the relevant noise management levels (NMLs) in the Interim Construction Noise Guideline (ICNG). Construction noise is predicted to exceed the NMLs at nearby residential receivers (assessment locations R16 to R21) during all construction stages except for site establishment. All other receivers are predicted to comply with the NMLs. No residential receivers are predicted to be highly noise affected. A suite of feasible and reasonable construction noise management and mitigation measures are proposed at the development to address construction noise impacts. This includes at-source mitigation measures such as equipment selection and siting, path mitigation measures such as construction hoarding and shielding of stationary noise sources, and noise management measures, such as implementation of a

construction environmental management plan, stakeholder consultation, site inductions, construction scheduling and a driver code of conduct.

#### Government Authority Advice

Throughout the assessment, the EPA maintained its concerns that the Applicant's assessment of noise impacts at NCA3 was not consistent with the NPfl as these receivers were assessed as commercial receivers, not their current use, which is residential. The EPA acknowledged that due to changing land use, environmental noise levels may change over time, however, during the transition period while residential properties are still occupied, the EPA advised a level of protection should be applied to these receivers. The EPA recommended the Applicant be required to revise its assessment of NCA3 and if the PNTL are unable to be achieved, that the Applicant demonstrate all reasonable and feasible noise mitigation measures have been applied. Noise limits were recommended for NCA1.

#### Department's Assessment

The Department notes the Applicant's approach to assessing NCA3 is consistent with the approach taken for assessing this NCA in the approved noise assessment for the IPG Master Plan, which adopted a commercial amenity criterion for NCA3. The Department also acknowledges the changing noise environment for residences close to the airport and the rezoning of this land to 'Enterprise'. However, while they are occupied residences, they must be considered as sensitive receivers, consistent with the NPfl, as recommended by the EPA, and should be offered noise mitigation to attenuate impacts, should they occur once the development is operational.

To ensure these existing residences are afforded an appropriate level of protection, the Department has recommended conditions requiring the Applicant to carry out a Noise Mitigation Review and report on the outcomes of the review to the Planning Secretary if a noise complaint is received from any of the owners of residential properties within NCA3 within the first year of operation of the development. If it is demonstrated that noise impacts at an affected residential receiver in NCA3 cannot be mitigated using all reasonable and feasible measures at the development, the Applicant must provide a written offer to enter into an agreement with the owner for the purposes of providing at-receiver noise mitigation measures. At-receiver noise mitigation measures may only include measures such as the provision of mechanical ventilation and/or air-conditioning, upgrade of façade elements (including glazing, seals, doors and roof insulation), or other measures agreed to with the affected parties

Consistent with the EPA's advice, the Department has included operational noise limits for residential properties in NCA1. Additionally, within three months of the commencement of operation, the Applicant is required to verify operational noise levels at receivers in NCA1. In the event of any exceedances, the Applicant must provide an outline of management actions to be taken to address the exceedances and a description of contingency measures in the event those management actions are not effective in reducing noise levels to an acceptable level.

The Department concurs with the Applicant’s views on operational road traffic noise and is satisfied cumulative road noise impacts will be considered against the requirements of the NSW Road Noise Policy with future road upgrades to be carried out by TfNSW.

While construction noise impacts are predicted to exceed noise management levels at some residences in NCA3 throughout the construction period, the Applicant has proposed to implement a suite of at-source best practice mitigation measures, noise path mitigation measures and management measures to reduce noise impacts. The Department notes significant noise reductions can be achieved by adopting these measures.

The Department acknowledges construction noise is temporary and varies throughout the construction program. However stringent controls are required to minimise impacts on residents. As such, the Department recommends the Applicant prepare a construction noise management plan and conduct routine monitoring at receivers throughout the construction program. Conditions also require the Applicant to construct the development to achieve the NMLs in the ICNG and to implement all reasonable and feasible noise mitigation measures.

The Department’s assessment concludes operation and construction of the development can be managed to minimise noise impacts on sensitive receivers, provided the recommended conditions are implemented.

## 6.4 Other Issues

The Department’s consideration of other issues is summarised in **Table 9** below.

**Table 9** | Assessment of other issues

Findings and conclusions	Recommended conditions
<p><b>Design Excellence</b></p> <ul style="list-style-type: none"> <li>The Western Parkland City SEPP requires the consent authority to be satisfied that SSDs in the Aerotropolis demonstrate design excellence, unless a master plan adequately provides for assessment of the design quality of the development. Under the approved IPG Master Plan, a Design Quality Strategy (DQS) was developed in consultation with the NSW Government Architect (GANSW) and established as a framework for the assessment of design quality for future development within the Master Plan.</li> <li>The Department’s assessment of the DQS found the proposed strategy meets the requirements of the Western Parklands City SEPP and will ensure a high standard of design quality. This is achieved by assessing proposals against a series of design quality principles and outcomes, including topography, land use, cultural heritage - Connecting with Country, urban built form, architecture, sustainability and public domain.</li> <li>Under the DQS the development is classified as ‘medium scale’ which requires an independent registered architect peer review. The review was submitted as part of the Applicant’s Design Verification Report (DVR) and concluded the proposal is generally compliant with the DQS.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>prepare and implement a Landscape Management Plan that incorporates additional diverse understorey plantings along the northern site boundary to minimise the use of turf.</li> </ul>

Findings and conclusions	Recommended conditions
<ul style="list-style-type: none"> <li>In addition to a Design Statement and Design Verification Checklist, the DVR considered the proposal against the DQS design principles.</li> <li>The DVR confirmed the development design incorporates generous building setbacks that exceed the minimum requirements of the WSA DCP. This allows for landscaping on all site boundaries. Internal functional requirements for automation and product storage have dictated the building height and form, resulting in a design of varying heights, breaking up the built form and massing. Earthy tones and warmer greys have been selected to align with the natural colour palette of the surrounding environment.</li> <li>The site design and landscaping also ensure deep soil and tree canopy requirement of 15% coverage established under the IPG Master Plan are achieved. The DVR concluded the proposal is suitable and complies with the WSA DCP and DQS.</li> <li>The Department is satisfied the DVR and independent review confirm the development will provide a high-quality design outcome by responding to the key design quality principles in the DQS. This includes minimising cut and fill, providing extensive vegetated landscaped setbacks along the perimeter to protect the western and central riparian corridors (to be established by IPG) reinforcing the creek-to-creek connection along Road 3, and achieving an appropriate built form through building alignment, orientation, street presentation and integration of landscaping for amenity.</li> <li>The following sustainability initiatives are also noted, including a solar energy system on the roof, water and energy efficiency measures (as outlined in a NABERS Agreement to Rate), maximising natural light in offices and integration of soft landscaping around the office entrance and generous landscaped setbacks to mitigate heat island effect.</li> <li>However, the Department notes the use of turf under canopy on all setbacks surrounding the hardstand and buildings, and considers this is not an appropriate landscape outcome, having regard to GANSW's <i>Biodiversity in Place</i> and the key Country creek-to-creek connection along Road 3.</li> <li>Conditions therefore require the Applicant to prepare a Landscape Management Plan which incorporates additional diverse understorey plantings consistent with the WSA DCP plant list within the landscaped setback along the northern site boundary to minimise the use of turf. This is in line with the landscape-led intentions of the Western Parkland City SEPP.</li> <li>The Department considers the design of the development appropriately responds to the principles and design outcomes of the approved DQS and provides a high standard of architectural design, with landscaping that appropriately considers the cultural landscape. The recommended conditions will also ensure further enhancement of the creek-to-creek connection and protection of blue-green corridors and landscape.</li> </ul>	
<b>Aboriginal Cultural Heritage</b>	
<ul style="list-style-type: none"> <li>To assess the potential impacts of the proposal on Aboriginal cultural heritage, the Applicant relied on the Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared by IPG for the Master Plan assessment. The ACHAR was prepared in accordance with relevant Heritage NSW guidance and in consultation with registered Aboriginal parties (RAPs).</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>prepare and implement an unexpected finds</li> </ul>

Findings and conclusions	Recommended conditions
<ul style="list-style-type: none"> <li>• Additionally, a Connecting with Country Framework was prepared as part of the IPG Master Plan, which provides details of the potential impacts to the cultural values of the site and the mitigating, country design considerations. A Recognise Country Response Template has been prepared in accordance with the requirements of the <i>Recognise Country: Guidelines for development in the Aerotropolis</i>.</li> <li>• The Applicant advised that the IPG ACHAR confirmed the creek lines and major drainage lines were identified as being of high significance to the Aboriginal community and were therefore designated as open space within the Master Plan design. However, direct impacts to 10 AHIMS sites was unavoidable. AHIMS ID 45-5-2674 was identified in close proximity to the southern boundary of the ALDI ADC site.</li> <li>• The Applicant also advised the development has been designed in line with the IPG Master Plan endorsed Connecting with Country Framework.</li> <li>• In response to a request from Heritage NSW, the Applicant provided additional information regarding the location of AHIMS ID 45-5-2674 and Registered Aboriginal Parties consultation evidence. Mapping confirmed the AHIMS site was outside the ALDI development site, and consultation was satisfactory and in line with relevant Heritage NSW requirements.</li> <li>• Heritage NSW subsequently advised it was satisfied with the information.</li> <li>• The Department is satisfied the approved IPG ACHAR has been prepared in accordance with the relevant Heritage NSW guidance and has incorporated the views and advice of the RAPs and Heritage NSW. The ACHAR and Additional Information provide sufficient evidence the development is unlikely to have adverse impacts on Aboriginal cultural heritage.</li> <li>• The Applicant's Recognise Country Response Template addresses the requirements of the WSA DCP and Recognise Country Guidelines. The Template confirms engagement with a range of Aboriginal stakeholders was conducted to inform the design of the IPG Master Plan. It also confirms a Walk-on-Country with Community was carried out and considers how the development achieves cultural landscape outcomes.</li> <li>• The Department is satisfied the development provides an appropriate design response having regard to the principles established in the IPG Master Plan Designing with Country Framework.</li> <li>• The Department has recommended conditions of consent requiring an unexpected finds protocol to be implemented during construction works.</li> <li>• The Department's assessment concludes the proposed development is unlikely to have any adverse impacts on Aboriginal cultural heritage and any unexpected finds during construction can be suitably protected and managed.</li> </ul>	<p>protocol during construction.</p>
<h3>Hazard and Risk</h3>	
<ul style="list-style-type: none"> <li>• The development will store a significant amount of dangerous goods (DG), including flammable liquid and aerosols, such as deodorants, insect sprays, alcohol-based cleaners, and sanitisers. The refrigeration system will use ammonia, a toxic gas. If released, ammonia may cause off-site impacts.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>• store and handle DG in accordance with Australian Standards and EPA guidance</li> </ul>

**Findings and conclusions****Recommended conditions**

- The EPA advised DG handling and storage presents pollution risks and that total chemical volumes are likely to exceed 2,000 tonnes, triggering the need for an EPL.
  - As part of the Submission Report, an updated PHA was provided to clarify the design of ventilation, the ammonia refrigerant systems, and the hazard release scenarios associated with the ammonia and aerosol releases. The updated PHA confirmed the designs are consistent with industry practice and capable of meeting the relevant Australian Standards.
  - The PHA also confirmed flammable liquids and aerosols are not to be handled in the Automatic Storage and Retrieval System (ASRS). In addition, the warehouse will include a cold store component that utilises ammonia as a refrigerant outside of the main warehouse and glycol system within the warehouses to minimise the risk of toxic risk within the warehouse.
  - The PHA found a full warehouse fire could have off-site impacts, however the risk is within the acceptable risk criteria.
  - While the PHA did not consider the worst-case release scenarios, the Department considers the analysis is generally realistic, and agrees the packaging arrangements for the aerosol and flammable liquids offer some protection and enable the operator to undertake required actions.
  - In relation to the ammonia release, all ammonia will be stored within a plant room with a 16m stack. The Department agrees that release of ammonia with consideration of the stack height will unlikely result in an off-site impact.
  - The Department is satisfied the PHA is valid and the potential risk is below the individual fatality risk criterion for industrial uses and therefore compatible with the surrounding land uses, subject to conditions.
  - The Applicant advised it was of the view an EPL was not required, the EPA maintained its view the development would likely require an EPL. This was on the basis of how DG volumes are calculated in the Australian DG Code 7.9 and definition of chemical storage in the POEO Act.
  - The EPA recommended a DG and hazardous chemicals management plan, an inventory list of all DGs and the classification and appropriate management of all hazardous waste. The Department has incorporated these requirements into the DG and SMS conditions outlined above. This will ensure the total volume of chemical storage is confirmed prior to the commencement of operation and if an EPL is required.
  - FRNSW recommended a FSS, compliance with FRNSW fire safety guidelines the provision of an adequate water supply, an Emergency Plan and an Emergency Services Information Package (ESIP).
  - To ensure the safety of people on and off the site, and to address the requirements of FRNSW and the EPA, conditions require a Fire Safety Study (FSS), a comprehensive Emergency Plan, a Safety Management System (SMS) covering all on-site operations and associated transport activities involving hazardous materials, and an ESIP.
  - Furthermore, to ensure the safe handling and storage of DGs, conditions require the storage and handling of DGs to be strictly in accordance with the relevant Australian Standards and relevant EPA guidance.
- prepare and implement a FSS, Emergency Plan, ESIP and SMS, which incorporates an inventory list of all DG and hazardous chemicals transported to the development and verify the total volume of chemical storage at the development.

Findings and conclusions	Recommended conditions
<ul style="list-style-type: none"> <li>The Department concludes the development can be safely operated to minimise risks associated with the handling of DGs and hazardous materials subject to the implementation of the recommended conditions.</li> </ul>	
<b>Air Quality</b>	
<ul style="list-style-type: none"> <li>Construction and operation of the development have the potential to result in air quality impacts to surrounding sensitive receivers. Construction works will generate fugitive dust emissions and the movement of trucks and other vehicles during operation will generate emissions from fuel combustion and fugitive dust. Truck refuelling may also generate emissions of volatile organic compounds (VOCs).</li> <li>The EIS included an Air Quality Impact Assessment (AQIA) which assessed potential air pollutant emissions associated with the construction and operation of the development.</li> <li>The AQIA found that construction would have a low risk of both dust soiling and impacts on human health due to the separation distance to sensitive receivers (&gt;250 m) and mean background air quality (5yr mean PM<sub>10</sub> concentrations below the EPA criterion of &lt;25ug/m<sup>3</sup>).</li> <li>Due to the potential for cumulative construction dust impacts, the AQIA recommended implementing a variety of management and mitigation measures relevant to a high risk development, including (but not limited to) water suppression of dust emissions, revegetation of earthworks and exposed areas as soon as practicable, storing aggregates in bunded areas, containment of bulk cement and fine powder materials, and inspection and maintenance of haul roads, as part of a CEMP for the site.</li> <li>The AQIA found that operational emissions would result in minimal incremental effects at surrounding sensitive receivers. It recommended several mitigation measures including ensuring idling of vehicles on site is limited, maintaining heavy lift equipment and other vehicles in accordance with best practice, cleaning up spillages in a timely manner and maintaining sealed roads and hardstands to be free of dust generating materials.</li> <li>The Department is satisfied the Applicant's AQIA has carried out an appropriate assessment of air quality impacts associated with the construction and operation of the development. To ensure the air quality impacts during construction remain low and noting the potential for cumulative impacts as the IPG Master Plan site is developed, the Department has recommended a site-specific Construction Air Quality Management Plan (CAQMP) be prepared and implemented, detailing all emission sources and associated control measures.</li> <li>The Department's is satisfied the temporary air quality impacts associated with the construction of the development would be acceptable subject to the implementation of CAQMP and all reasonable and feasible measures by the Applicant to minimise dust.</li> <li>Subject to the implementation of the recommended conditions and the commitments made by the Applicant, the Department's assessment concludes the development would not result in adverse air quality impacts to surrounding sensitive receivers.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>take all reasonable steps to minimise dust generated during all stages of construction works</li> <li>ensure the development's emissions comply with relevant legislation for air pollutant emissions and prohibit the emission of offensive odour</li> <li>require the Applicant to prepare a CAQMP as part of the CEMP</li> <li>install and operate equipment in line with best practice.</li> </ul>

**Findings and conclusions****Recommended conditions****Contamination**

- The site was formerly used for intensive poultry farming and may therefore be contaminated by asbestos from the former farm sheds (now demolished) and other contaminants of potential concern in soil and groundwater. Remediation works have been undertaken as part of the requirements of an EPL applicable to the poultry farming activities at the site, issued by the EPA.
- As part of the IPG Master Plan, an Environmental Report was prepared that detailed the findings of various reports associated with contamination investigations and remediation works undertaken at the site. This included a Preliminary Site Investigation (PSI) and a Detailed Site Investigation (DSI) to assess the presence of soil and groundwater contamination, undertaken as part of the discharge of the EPL issued for the former poultry farming activities. Other reports included details of the remediation and validation works carried out, as well as waste classification reports.
- The reports confirmed the land identified for the ADC site previously contained a farm building, and has undergone past remediation works, including the manual removal (“emu-pick”) of asbestos-containing material (ACM). Validation of these works confirmed that the site is suitable for the proposed commercial and industrial uses, provided the recommendations in the report are implemented. These include adopting an Asbestos Management Plan (AMP) and an Unexpected Finds Protocol (UFP).
- As part of the EIS, the Applicant provided an AMP and UFP and committed to implementing these plans during construction of the development.
- The EPA noted the findings of the DSI and recommended IPG contact the EPA for any concerns pertaining to the current EPL, if required. Council also noted the DSI and advised the consent authority to be satisfied the requirements of State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP) had been met.
- The Department notes the Resilience and Hazards SEPP requires the consent authority to consider if the land is contaminated, and if so, if it is suitable in that state (or will be suitable after remediation) and for a change of use, consider a preliminary investigation of the land in accordance with the Contaminated Land Planning Guidelines.
- The Department is satisfied the previous reports and investigations carried out for the site and the IPG Master Plan satisfy the considerations above. However, the Applicant should be required to implement the AMP and UFP.
- The Department concludes that any existing on-site contamination has been suitably remediated and the site is suitable for the proposed development, with the implementation of the AMP and UFP.

Require the Applicant to:

- implement the AMP and UFP.

**Bush fire**

- The site is located on land that is identified as bush fire prone and must comply with RFS’s Planning for Bush fire Protection (PBP) (2019).
- The EIS included a copy of the IPG Bush fire Assessment Report (BAR) which assessed the entire IPG Master Plan against the provisions of the PBP. In response to a request from the RFS, a project-specific Bush fire Risk

Require the Applicant to:

- implement bush fire protection measures in the BRAR

Findings and conclusions	Recommended conditions
<p>Assessment Report (BRAR) was provided for the development as part of the Submissions Report.</p> <ul style="list-style-type: none"> <li>The BRAR noted the predominant bush fire threat to the development would be the vegetated riparian corridors along the east and western boundaries, which will form part of the developed IPG Master Plan.</li> <li>In line with the BRAR recommendations, the Applicant has adopted several mitigation measures, including managing the entire site as an inner protection area, constructing the building in accordance with BAL 12.5 construction standards and a bush fire emergency management and evacuation plan (BEMEP).</li> <li>The NSW RFS reviewed the BRAR and raised no objections. It recommended the development be carried out in accordance with the recommendations of the BRAR and the relevant provisions of PBP.</li> <li>The Department has reviewed the Applicant's assessment and concurs with RFS that the proposal meets the requirements of the PBP. Conditions have been recommended requiring the Applicant to implement the recommendations of the BRAR.</li> <li>The Department's assessment concludes that bush fire risks associated with the site can be appropriately addressed by implementation of the Applicant proposed mitigation measures and the recommended conditions of consent.</li> </ul>	<ul style="list-style-type: none"> <li>prepare and implement a BEMEP for the duration of the development.</li> </ul>
<b>Flooding</b>	
<ul style="list-style-type: none"> <li>Badgerys Creek lies to the west of the site and parts of the site are noted as being flood affected during a Probable Maximum Flood Event in the approved Flood Risk and Impact Assessment (FIRA) for the IPG Master Plan.</li> <li>The Applicant relied on the findings of the IPG FIRA, rather than providing a separate project-specific flood assessment.</li> <li>The IPG FIRA concluded that all the development lots in the IPG Master Plan, including the ALDI development lots, are above the 1 in 100-year AEP plus 0.5 m freeboard and 1 in 500-year AEP event flood levels. In addition, the Applicant advised the development design adopts a finished floor level of RL69.0 m AHD, which is well above the 1 in 100 year plus freeboard level of 65.4 m AHD.</li> <li>CPHR noted the FIRA had assessed the impact of the ALDI lot as part of the broader IPG Master Plan and raised no concerns. Council recommended conditions requiring existing stormwater flows running through the site to be managed and conveyed downstream safely, ensuring no adverse flooding impact on the adjoining property. Both Council and Sydney Water recommended a requirement for permanent on-site detention prior to the commencement of operation.</li> <li>The Department has reviewed the FIRA and acknowledges a detailed assessment of flood risk was carried out for the IPG Master Plan which was assessed by the Department and approved. This demonstrates the ALDI lot will not be impacted by flooding with the exception of minor encroachment of flood waters during a PMF along the western edges of the development.</li> <li>The Department also notes the FIRA predicted negligible adverse impacts upstream and downstream as a result of the development. The FIRA confirmed evacuation would be possible via Road 3 and to the south of the</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>manage and safely convey stormwater flows</li> <li>not commence operation until such time stormwater detention infrastructure is operational</li> <li>prepare and implement an Emergency Plan.</li> </ul>

## Findings and conclusions

## Recommended conditions

development to elevated flood free locations, with evacuation routes ultimately being via the Eastern Ring Road, once constructed.

- Noting the advice of Council, the Department has incorporated a condition requiring the conveyance of existing stormwater flows across the site. Additionally, as noted in Section 6.2 of this report, conditions limit operation commencement until such time stormwater detention infrastructure is delivered and operational to manage stormwater flows from the development.
- Conditions also require the Applicant to prepare and implement an Emergency Plan to the satisfaction of the Planning Secretary. This will need to consider the risk of flooding (in addition to all other emergency scenarios) and how people can be safely evacuated from the site, if required.
- The Department's assessment concludes the development would not be subject to unacceptable flood risk and would not increase flood risk to offsite properties subject to the implementation of the recommended conditions.

## Airport Safeguarding

- The site is subject to the airport safeguard controls of the Western Parkland City SEPP due to its proximity to the Western Sydney Airport, with the entire site located within the 3 km wildlife buffer zone.
- The EIS included an Aeronautical Impact Assessment (AIA) which considered the proposal against the airport safeguarding requirements of the Western Parkland City SEPP, WSI Airport Safeguarding Tool and the National Airport Safeguarding Framework (NASF) guidelines. The AIA also incorporated the findings and recommendations of the approved Aeronautical Impact Assessment Report and Wildlife Hazard Assessment prepared for the IPG Master Plan.
- The AIA considered impacts of aircraft noise, building generated windshear and turbulence, wildlife hazards, lighting impacts, and the potential for impacts on the protected airspace, aviation facilities and systems, public safety and construction impacts. The AIA concluded that the development would not adversely affect the WSI Airport airspace or operations, subject to compliance with *Australian Standard AS2021:2015 Acoustics - Aircraft noise intrusion - Building siting and construction*, wildlife hazard monitoring and management, installation of lighting that does not cause distraction or glare for pilots and no change to the height of the development (111 m AHD), which the AIA confirmed is below the WSI Airport obstacle limitation surface (OLS).
- The Applicant has committed to implement the recommendations of the AIA.
- A Waste Management Plan (WMP) was also submitted with the EIS which considered wildlife hazards and confirmed that bins would have fixed lids and suitable enclosures for waste storage to ensure they cannot be accessed by birds or flying foxes.
- AirServices, CASA and the WSI Airport confirmed that the development would not impact WSI Airport airspace or operations. However, it was noted that further consideration and approval under the *Airports Act 1996* and *Airport (Protection of Airspace) Regulations 1996* would be required if there

Require the Applicant to:

- prepare and implement a wildlife hazard management plan
- ensure plantings in the landscape strategy for the site minimise wildlife risk
- ensure lighting complies with the requirements of the NASF Guideline E to manage distractions to pilots
- ensure indoor design levels within office spaces are designed in accordance with relevant Australian Standards for aircraft noise intrusion
- implement the WMP and store waste in enclosures that cannot be accessed by birds or flying foxes.

**Findings and conclusions**

**Recommended conditions**

was any change to the location or height of the development, or cranes used for construction, as these structures may extend into the protected airspace.

- WSI Airport recommended conditions regarding lighting intensity to prevent distractions to pilots during construction and operation, as per the requirements of the *NASF Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports*.
- The Department has considered the comments by AirServices, CASA and WSI Airport and has recommended conditions reflecting their advice, as well as requirements relating to the selection of landscape species to minimise wildlife attraction. Conditions require the preparation of a site-specific Wildlife Hazard Management Plan that details mitigation measures to minimise wildlife attraction, including those in the AIA.
- To further minimise wildlife hazards associated with waste storage at the development, conditions require the Applicant to implement the WMP.
- The Department has also included a note in the development consent that further approvals under the Commonwealth airport legislation may be required for construction or any other intrusion into the protected airspace.
- The Department’s assessment concludes the development would not impact on the operation of the WSI Airport with the appropriate design responses and mitigation measures in place.

**Visual**

- As a large format high bay warehouse, the development will be visible from locations around the site and has the potential to create adverse visual impacts at residential areas to the southwest in Bradfield.
- The Applicant’s Visual Impact Assessment (VIA) assessed visual impacts from six public viewpoints around the development, including consideration of views from public roads, future public open space areas to the south and existing residential areas to the southwest (Bradfield) and east (Rossmore and Kemps Creek).
- The VIA found the impacts to the west in Bradfield would be medium to high as a result of the visibility of the high-bay components. These elements were anticipated and are a compliant built form within the designated super lot, as reflected in the approved Master Plan. All other assessment factors, including scenic quality and view blocking of scenic elements were identified as ‘low’, indicating the perceived effect, while visible from BCR and nearby properties, remains consistent with and appropriate to the intended future industrial land use of the area.
- The VIA concluded, on balance, when all relevant matters are considered, the visual effects and view impacts caused by the proposed development are considered to be reasonable and acceptable.
- The Department notes that no submissions or government stakeholders raised concerns regarding visual impacts and the development is consistent with the built form and scale approved as part of the IPG Master Plan. It is also acknowledged the Aerotropolis is undergoing significant change and the development will integrate with other built form as the area is developed to higher order uses. Visual impacts on nearby residential areas to the south west are distant and will likely to be temporary in nature.

Require the Applicant to:

- prepare and implement a landscape management plan.

Findings and conclusions	Recommended conditions
<ul style="list-style-type: none"> <li>Landscaping proposed around the perimeter of the development will provide some screening to the lower portion of the building and hardstand areas. In particular, a vegetated tiered retaining wall along the western site boundary will incorporate large canopy trees for screening. Visual impacts are further softened by incorporating stepped roof forms and large setbacks to BCR along the Western Riparian Corridor.</li> <li>Conditions require the preparation and implementation of a detailed landscape strategy consistent with the landscaping detailed in the EIS. The Department concludes the visual impacts of the development are acceptable.</li> </ul>	
<h3>Contributions</h3>	
<p><u>Regional Contributions</u></p> <ul style="list-style-type: none"> <li>The site is located within the Western Sydney Aerotropolis Special Infrastructure Contributions Area (WSA SIC), which came into effect on 25 March 2022. The Applicant is required to make a contribution towards the provision of infrastructure in the Aerotropolis.</li> <li>The Applicant confirmed that it intends to make a monetary contribution to meet its obligations under the WSA SIC. A condition formalising this requirement has been included in the recommended instrument.</li> </ul> <p><u>Local Contributions</u></p> <ul style="list-style-type: none"> <li>The site is located within the Liverpool Aerotropolis Development Contributions Plan 2023 area. The local contribution plan requires the payment of a contribution of 4.6% of the development cost.</li> <li>The Applicant prepared a cost summary report to determine the cost of carrying out the development as per section 208 of the EP&amp;A Regulation.</li> <li>Council reviewed the cost summary report and advised that the Applicant would be required to make a development contribution of \$22,215,671.</li> <li>As such, the Department has recommended conditions requiring the payment of the local development contributions.</li> </ul>	<p>Require the Applicant to:</p> <ul style="list-style-type: none"> <li>satisfy their obligations under the WSA SIC</li> <li>pay the development contributions to Council.</li> </ul>

## 7 Evaluation

The Department's assessment of the application has fully considered all relevant matters under section 4.15 of the EP&A Act, the objects of the EP&A Act and the principles of ESD.

The Department has considered the development on its merits, taking into consideration strategic plans that guide development in the area, the EPIs that apply to the development, advice received from the relevant public authorities, including Council. The Department did not receive any submissions from the public.

None of the State government authorities Council object to the proposal and the Department has sought to address any issues raised through consultation with both the government authorities and the Applicant.

The Department is satisfied that traffic and access impacts are acceptable, as the Applicant has demonstrated that both construction and operational traffic can be supported by the surrounding network once key IPG and TfNSW road upgrades are delivered. The Department's recommended conditions ensure this occurs in an orderly way, requiring the Applicant to verify that all necessary interim road infrastructure is complete before construction and operation commence. Additional requirements for driveway design approvals, pavement protection and on-site queuing controls will ensure safe vehicle movements and prevent impacts on nearby roads.

The development can meet all required waterway health performance targets, provided it is supported by the regional stormwater basins and detention infrastructure to be delivered under separate approvals. Because the development relies on this off-site system, conditions prevent construction until temporary sediment basins are in place, and prevent operation until the regional basins are approved, constructed and operational. A detailed Water and Stormwater Management Plan and final design integration with Sydney Water, CPHR and Council will ensure the system performs effectively and protects the Wianamatta–South Creek catchment.

Noise impacts can be managed with appropriate mitigation, despite the transitional nature of surrounding residential receivers. Conditions impose enforceable operational noise limits, require early-operation verification monitoring, and establish a Noise Mitigation Review process that triggers at-receiver treatment if complaints arise. Construction noise management and monitoring are also required. These measures ensure both operational and construction noise can be controlled to protect remaining sensitive receivers as the area evolves into its intended employment-based land use.

The Department is satisfied the development achieves an acceptable design and amenity outcome because it has been guided by the approved IPG Design Quality Strategy, which ensures high-quality built form, landscaping and site planning across the Master Plan area, while having regard to Connecting with Country outcomes. Independent architectural review confirms the proposal meets

required design principles, and the development incorporates appropriate setbacks, massing and materials that integrate with its surroundings. Conditions requiring enhanced native understorey planting along the northern boundary and detailed landscape strategy to further strengthen the landscape and Connecting with Country outcomes.

The Applicant's assessments confirm that air quality, hazard and risk, contamination, bushfire, flooding and airport safeguarding issues can all be effectively managed subject to the Applicant's mitigation and management measures and implementation of the Department's recommended conditions. Together, these measures will ensure the development operates safely, protects the environment, and avoids adverse impacts on the surrounding community.

The development is consistent with the IPG Master Plan and complies with the WSA Precinct Plan, the detailed controls in the WSA DCP and is consistent with the objectives of the ENT zone.

The Department is satisfied the impacts of the development can be appropriately managed through implementation of the recommended conditions of consent. The Department has also recommended conditions for the payment of local and State development contributions to contribute to infrastructure upgrades to service the development, including upgrades to BCR and delivery of the ERR.

Overall, the Department's assessment has concluded the development would:

- support the development of the warehouse and logistics sector connected to the WSI Airport
- be consistent with the strategic direction for the site under the Aerotropolis Plan, Western Parkland City SEPP, WSA Precinct Plan and the IPG Master Plan
- incorporate high quality design finishes, materials, artwork, landscaping into the design of the development, developed through a Country-led design process
- contribute additional industrial floorspace to support the growth of the Aerotropolis and associated warehouse and logistics sector
- represent an investment of over \$1 billion in the Liverpool City LGA and provide up to 3,728 construction jobs and 585 operational jobs.

The Department considers that these benefits can be realised without any significant amenity or environmental impacts and therefore, considers the development is in the public interest and should be approved, subject to conditions.

## 8 Recommendation

For the purpose of section 4.38 of the EP&A Act, it is recommended the A/Director, Industry Assessments, as delegate of 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 consent to the application
- **agrees** with the key reasons for approval listed in the notice of decision
- **grants consent** for the application in respect of ALDI Automated Distribution Centre (SSD-76913969)
- **signs** the attached development consent (**Appendix D**).

Recommended by:



20 February 2026

**Sally Munk**

Principal Planner

Industry Assessments

## 9 Determination

The recommendation is **adopted** by:

 26 February 2026

**Joanna Bakopanos**  
A/Director  
Industry Assessments

# Glossary

Abbreviation	Definition
ACHAR	Aboriginal Cultural Heritage Assessment Report
AG DCCEEW	The Australian Government Department of Climate Change, Energy, the Environment and Water
AHD	Australian Height Datum
Applicant	ALDI Foods Pty Ltd
BDAR	Biodiversity Development Assessment Report
Council	Liverpool City Council
CPHR	Conservation Programs and Heritage Regulation Group of the NSW Department of Climate Change, Energy, the Environment and Water
DA	Development Application
Department	Department of Planning, Housing and Infrastructure (DPHI)
Development	The development as described in the EIS for the construction and operation of a large format warehouse and automated distribution centre
DPIRD	Department of Primary Industries and Regional Development
EDC	Estimated Development Cost
EIS	Environmental Impact Statement titled 'Environmental Impact Statement ALDI Automated Distribution Centre' prepared by Urbis Ltd dated 12 May 2025
EPA	NSW Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>

Abbreviation	Definition
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
ESD	Ecologically Sustainable Development
FRNSW	Fire and Rescue NSW
Heritage NSW	Heritage NSW, within the NSW Department of Climate Change, Energy, the Environment and Water
LEP	Local Environmental Plan
Minister	Minister for Planning and Public Spaces
DCCEEW	NSW Government Department of Climate Change, Energy, the Environment and Water
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
Planning Secretary	Secretary of the Department
SEARs	Planning Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SSD	State Significant Development
TfNSW	Transport for NSW
Western Parkland City SEPP	State Environmental Planning Policy (Precincts - Western Parkland City) 2021
WSAPP	Western Sydney Aerotropolis Precinct Plan
WSI Airport	Western Sydney International (Nancy-Bird Walton) Airport

# Appendices

## Appendix A – List of Referenced Documents

The Department has relied upon the following key documents during its assessment of the development:

### Environmental Impact Statement

- ‘Environmental Impact Statement ALDI Automated Distribution Centre’, prepared by Urbis dated 12 May 2025

### Submissions

- All submissions received from relevant public authorities and the general public

### Submissions Report

- ‘Submissions Report ALDI Automated Distribution Centre’, prepared by Urbis and dated 27 October 2025.

### Additional Information

- ‘Additional information submitted to support the development application including correspondence titled ‘SSD-76913969 | ALDI RTS Response’ prepared by Urbis Ltd dated 19 December 2025 and correspondence titled ‘SSD-76913969 | ALDI RTS Response’ prepared by Urbis Ltd dated 3 February 2026

### Statutory Documents

- Relevant considerations under section 4.15 of the EP&A Act (see **Appendix E**)
- Relevant environmental planning instruments, policies and guidelines (see **Appendix E**)

All documents relied upon by the Department during its assessment of the application may be viewed at:

<https://www.planningportal.nsw.gov.au/major-projects/projects/aldi-automated-distribution-centre>

## Appendix B – Submissions and Government Authority Advice

All submissions and government authority advice can be found here:

<https://www.planningportal.nsw.gov.au/major-projects/projects/aldi-automated-distribution-centre>

## Appendix C – Statutory Considerations

**Table 10** | Mandatory Matters for Consideration

Matter for Consideration	Department's Assessment
Environmental planning instruments, proposed instruments and development control plans	The Department's consideration of the relevant EPIs (including draft instruments subject to public consultation under the EP&A Act) is provided in <b>Appendix C</b> .
Planning agreements	There are no planning agreements associated with the application.
EP&A Regulation	The Department has assessed the development in accordance with all relevant matters prescribed by the EP&A Regulation, the findings of which are contained in this report.
Likely impacts	The Department has considered the likely impacts of the development in detail in <b>Section 6</b> of this report. The Department concludes that all environmental impacts can be appropriately managed and mitigated through the recommended conditions of consent.
Suitability of the site	The site is suitable for the development as it is consistent with the intended land use in the IPG Master Plan and the Aerotropolis strategic framework. The development is permissible with consent.
Public submissions	No public submissions were received.
Public interest	The development would generate up to 3,728 jobs during construction and 585 operational jobs and direct over \$1 billion in capital investment in the Liverpool City local government area. The environmental impacts of the development would be appropriately managed via the recommended conditions. The Department considers to the development is in the public interest.

### Objects of the EP&A Act

A summary of the Department's consideration of the relevant objects (found in section 1.3 of the EP&A Act) are provided in **Table 11** below.

**Table 11** | Objects of the EP&A Act and how they have been considered

Object	Consideration
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,	<ul style="list-style-type: none"> <li>The development would promote social and economic welfare by generating up to 585 operational jobs on Enterprise zoned land and investing over \$1 billion in the Liverpool City LGA.</li> </ul>

Object	Consideration
	<ul style="list-style-type: none"> <li>The development would also promote a better environment by providing generous setbacks incorporating native landscaping and employing stormwater management measures to achieve waterway health targets for the Wianamatta-South Creek catchment.</li> </ul>
<p>(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</p>	<ul style="list-style-type: none"> <li>The development incorporates a range of ESD measures including use of rooftop solar energy, installation of energy and water efficient fixtures, electric car and truck charging, natural lighting, building orientation, material selection and landscaping. The development aims to achieve a 5.5 star energy rating and a 3-star water efficiency rating for its office space, through entering an agreement to rate under the NABERS system.</li> <li>The development would further promote social and economic growth by providing infrastructure and jobs with access to significant open space.</li> </ul>
<p>(c) to promote the orderly and economic use and development of land,</p>	<ul style="list-style-type: none"> <li>The development is a permissible use and promotes the orderly and economic use of the land by providing warehouse space to support the WSI Airport operations. The development is within the first stage of the IPG Master Plan and will be supported by the orderly delivery of infrastructure and services for construction and operation.</li> </ul>
<p>(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,</p>	<ul style="list-style-type: none"> <li>The site is bio-certified and a BDAR waiver has been issued. Refer to <b>Section 4.6</b> of this report for the Department's consideration of biodiversity.</li> </ul>
<p>(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</p>	<ul style="list-style-type: none"> <li>The development promotes the sustainable management of built and cultural heritage of the area by incorporating Aboriginal cultural heritage values into the building and landscaping design, and through the avoidance of identified artefacts.</li> </ul>
<p>(g) to promote good design and amenity of the built environment,</p>	<ul style="list-style-type: none"> <li>The development has been assessed against the DQS adopted under the approved IPG Master Plan. The Department's assessment has found the development exhibits a high quality design ad</li> </ul>

Object	Consideration
	promotes the amenity of the built environment through building design and massing.
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	<ul style="list-style-type: none"> <li>The Department has recommended a number of conditions of consent to ensure the construction and maintenance of the Development is undertaken in accordance with the relevant legislation, guidelines, policies and procedures.</li> </ul>
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	<ul style="list-style-type: none"> <li>The Department has assessed the development in consultation with, and giving due consideration to, the technical expertise and comments provided by other State government authorities and Council. This is consistent with the object of sharing the responsibility for environmental planning between the different levels of government in the State.</li> </ul>
(j) to provide increased opportunity for community participation in environmental planning and assessment.	<ul style="list-style-type: none"> <li>The application was exhibited in accordance with Schedule 1 clause 9 of the EP&amp;A Act to provide public involvement and participation in the environmental planning and assessment of this application.</li> </ul>

### EP&A Regulation

Part 4, Division 1 of the EP&A Regulation requires the consent authority to consider additional matters for certain developments as part of the matters for consideration under section 4.15 of the EP&A Act.

For the purposes of the development, section 66 requires that development in the Aerotropolis not be determined by the consent authority unless a contributions plan has been approved for the land to which the application relates. The Liverpool Aerotropolis Development Contributions Plan 2024 applies to the land. As such, the development application may be determined.

There are no additional matters in Division 1 of the EP&A Regulation that the consent authority must consider.

### Environmental Planning Instruments (EPIs)

#### State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)

The Planning Systems SEPP identifies certain classes of development as SSD. The proposal is SSD pursuant to section 4.36 of *Environmental Planning and Assessment Act 1979* (EP&A Act) because it involves development with an EDC over \$30 million which meets the criteria in Clause 29 of Schedule 1 in the Planning Systems SEPP.

## **State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)**

Chapter 2 of the T&I SEPP aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development adjacent to certain types of infrastructure development, and providing for consultation with relevant public authorities about certain types of development during the assessment process.

The Department consulted with TfNSW as part of its assessment of the application. TfNSW's comments are detailed in **Section 5**. The Department has considered the comments from TfNSW and, where applicable, has included TfNSW's requirements in the recommended conditions of consent.

## **State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)**

Chapter 3 of the Resilience and Hazards SEPP aims to identify developments with the potential for significant off-site impacts, in terms of risk and/or offence.

The development is defined as potentially hazardous and potentially offensive as it will store and handle large volumes of dangerous goods and chemicals. The Applicant's Preliminary Hazard Analysis showed that one scenario (a full warehouse fire) could result in impacts over the site boundary and into the adjacent land use. However, the probability of a fatality from a full warehouse fire at the site boundary is within the acceptable risk criteria.

The EPA advised an EPL would likely be required as the development would store over 2,000 tonnes of chemicals, which exceeds the trigger for a Scheduled Activity in the POEO Regulation.

The Department has consulted with the EPA and carefully considered the Applicant's PHA and concludes the PHA is valid and the findings are acceptable.

To ensure the safety of people on and off the site, and to address the requirements of FRNSW and the EPA, conditions require a Fire Safety Study, a comprehensive Emergency Plan, a Safety Management System covering all on-site operations and associated transport activities involving hazardous materials, and an ESIP.

Furthermore, to ensure the safe handling and storage of DGs, conditions require the storage and handling of DGs to be strictly in accordance with the relevant Australian Standards and relevant EPA guidance.

Chapter 4 of the Resilience and Hazards SEPP aims to provide a State-wide approach to the remediation of contaminated land.

The site may contain asbestos. The Applicant confirmed a Preliminary Site Investigation and Detailed Site Investigation had previously been prepared for the site, which were submitted as part of the EIS.

The Department is satisfied the previous reports and investigations carried out for the site and the IPG Master Plan satisfy the considerations under the SEPP. However, the Applicant should be required to implement an Asbestos Management Plan (AMP) and Unexpected Finds Protocol (UFP). The Department concludes that any existing on-site contamination has been suitably remediated and the site is suitable for the proposed development, with the implementation of the AMP and UFP.

### State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP)

Chapter 3 of the I&E SEPP aims to ensure that outdoor signage is compatible with the desired amenity and visual character of an area, and provides effective communication in suitable locations, that is of a high-quality design and finish, in accordance with Schedule 5. The Department’s consideration of the Schedule 5 assessment criteria is provided in **Table 12** below.

**Table 12 | Consideration of Industry and Employment SEPP – Schedule 5 Assessment Criteria**

Objective	Consideration
1 Character of the area	<p>The development is within an emerging industrial precinct that is changing from its previous rural landscape to an area comprising warehousing and other industrial buildings.</p> <p>The pylon signs range in height from 1.8 m - 10 m, while the business identification signs are mounted on the warehouse facades and will not protrude above the warehouse roof.</p> <p>The signage design has a consistent theme across the site that is considered appropriate for a modern industrial precinct and the desired future character of the area.</p>
2 Special areas	<p>The Applicant’s Visual Impact Assessment demonstrates the signage will not detract from the amenity of visual quality of any environmentally sensitive areas, heritage areas, natural or other conservations areas, open space areas, waterways, rural landscapes or residential areas.</p>
3 Views and vistas	<p>The signage will not block or dominate any views or vistas. The proposed signage would not dominate the skyline. The proposed signage would not impact on other advertisers and would ensure an orderly identification of the site and individual buildings and provide necessary wayfinding for employees and visitors.</p>
4 Streetscape, setting or landscape	<p>The scale and form of the proposed signage is considered appropriate and proportionate for the proposed development, particularly noting the high bay components and the scale and siting of signage on each façade. Signage is considered consistent with the anticipated future industrial</p>

Objective	Consideration
	development in the site's surrounds. There is no existing advertising sign on site. The proposed signs would not protrude above buildings or structures in the area or locality. The façade signage will be visible above tree canopies due to the scale of the high bay components. However, separation distances between the building and distant residential areas (~400m), will minimise visual impacts and not detract from the setting or landscape, particularly as it transitions in line with land uses permitted in the ENT zoning. The signs do not require ongoing vegetation management.
5 Site and building	The proposed signage is compatible with the scale of the proposed high bay warehousing building. The proposed signage would not detract from important features. The proposed signage is compatible with the future of development in the Enterprise zone in the precinct.
6 Associated devices and logos with advertisements and advertising structures	The signage will display the ALDI name and logo. There are no safety devices or platforms proposed with the signage. Illumination is to be integrated into the existing design of the sign.
7 Illumination	Low wattage illumination of pylon signs and building identification signage is proposed. Conditions require fixed lighting at the development to comply with the requirements of the <i>National Airport Safeguard Framework Guideline E: Managing the risk of distractions to pilots from lighting in the vicinity of airports</i> and AS 4282-2019 – Control of obtrusive effects of outdoor lighting, and must be mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. Illumination is not expected to detract from the amenity of any residence or affect the safety for pedestrians or vehicles or aircraft.
8 Safety	The scale of the signs will not reduce the visibility of the road network or obscure sightlines from areas. As such, it is not expected that the signage would cause a safety risk.

### State Environmental Planning Policy (Sustainable Buildings) 2021 (Sustainable Buildings SEPP)

The Sustainable Buildings SEPP commenced on 1 October 2023 and aims to encourage the design and delivery of sustainable buildings. This includes recording the embodied emissions of materials used in construction and the measures to minimise energy and water consumption and the generation of greenhouse gas emissions. For large-commercial developments, the consent authority must consider if the development meets the aims of the Sustainable Building SEPP.

The Department has considered the proposed development including the Net Zero Statement, signed NABERS Agreement to Rate (for energy and water), the embodied emissions form and the ecologically sustainable development measures including use of rooftop solar energy, and installation of energy and water efficient fixtures. The Department considers the development has been designed to minimise energy and water consumption and the generation of greenhouse gas emissions and is consistent with the aims of the SEPP.

### State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (Western Parkland City SEPP)

The Western Parkland City SEPP is the principal EPI relating to the development. Chapter 4 provides a statutory planning framework for development in the Aerotropolis by giving effect to the WSAP and the Precinct Plan, setting out development controls and the permitted or prohibited land uses. The Parkland City SEPP also aims to recognise the physical and cultural connection of the Aboriginal community to the land and to minimise the impact of development on vegetation and waterway health.

The Department has considered the relevant provisions of the Western Parkland City SEPP in **Table 13** and concludes the development is consistent with the Western Parkland City SEPP. The Department has also considered the requirements of the WSAPP and the relevant requirements of the IPG Master Plan, as required by the Western Parkland City SEPP, in **Table 13** and **Table 14**.

**Table 13 |** Consideration of the Western Parkland City SEPP

Relevant Considerations	Response
<b>Section 4.17 Aircraft Noise</b>	
(2) Development consent must not be granted to noise sensitive development if the development is to be located on land that is in an ANEF or ANEC contour of 20 or greater.	The site is mapped as being within an ANEC contour of 20 or greater. However, the development does not propose any noise sensitive development as defined in this section.
<b>Section 4.19 – Wildlife Hazards</b>	
(2) Development consent must not be granted to relevant development on land in the 13 km wildlife buffer zone unless the consent authority – (a) has consulted the relevant Commonwealth body, and (b) has considered a written assessment of the wildlife that is likely to be present on the land and the risk of the wildlife to the operation of the Airport provided by the applicant, which includes –	The Department has consulted with Western Sydney International Airport (WSI Airport) (as the relevant Commonwealth body) during the assessment of the development. The Department has considered the Applicant’s wildlife assessment and is satisfied that the development will mitigate the risk of wildlife, subject to compliance with the recommended conditions (See <b>Section 6.4</b> ).

Relevant Considerations	Response
<p>(i) species, size, quantity, flock behaviour and the particular times of day or year when the wildlife is likely to be present, and</p> <p>(ii) whether any of the wildlife is a threatened species, and</p> <p>(iii) a description of how the assessment was carried out, and</p> <p>(c) is satisfied that the development will mitigate the risk of wildlife to the operation of the Airport, including, for example, measures relating to—</p> <p>(i) waste management, landscaping, grass, fencing, stormwater or water areas, or</p> <p>(ii) the dispersal of wildlife from the land by the removal of food or the use of spikes, wire or nets.</p>	
<b>Section 4.21 Lighting</b>	
<p>(2) Development consent must not be granted to development for the following purposes on land shown as the “6 km Lighting Intensity Radius”, a “Light Control Zone” or a “Runway Boundary” on the <i>Lighting Intensity and Wind Shear Map</i> unless the consent authority has consulted the relevant Commonwealth body—</p> <p>(a) installation and operation of external lighting (whether coloured or white lighting) in connection with development for the following purposes—</p> <p>(i) classified roads,</p> <p>(ii) freight transport facilities,</p> <p>(iii) heavy industrial storage establishments,</p> <p>(iv) recreation facilities (major),</p> <p>(v) recreation facilities (outdoor),</p> <p>(b) installation and operation of external lighting in connection with construction works that is likely to be obtrusive or create light spill outside the land on which the construction works are carried out.</p>	<p>The site is located within the 6 km Lighting Intensity Radius. The Department has consulted with WSI Airport (as the relevant Commonwealth body) during the assessment of the development. The Department has recommended conditions reflecting the advice of the Airport to ensure lighting intensity complies with their requirements during construction and operation.</p>
<b>Section 4.22 – Airspace Operations</b>	
<p>(3) Development consent must not be granted to development to which this section applies unless—</p> <p>(a) the consent authority has consulted the relevant Commonwealth body, and</p>	<p>The Department has consulted with WSI Airport (as the relevant Commonwealth body) during the assessment of the development. WSIA advised the</p>

Relevant Considerations	Response
<p>(b) the relevant Commonwealth body advises the consent authority that –</p> <p>(i) the development will penetrate the prescribed airspace but it does not object to the development, or</p> <p>(ii) the development will not penetrate the prescribed airspace.</p>	<p>development would not penetrate the prescribed airspace.</p> <p>The Applicant also confirmed this in the Aviation Impact Assessment included as part of the EIS.</p>
<p><b>Section 4.24 - Flood Planning</b></p>	
<p>(3) Development consent must not be granted to development on land to which this section applies unless the development –</p>	<p>All warehouses are located above flood planning levels. The Department’s consideration of flood impacts, including evacuation, is included in <b>Section 6.4</b>.</p>
<p>(a) is compatible with the flood hazard of the land, taking into account projected changes as a result of climate change, and</p>	
<p>(b) is not likely to significantly adversely affect flood behaviour resulting in detrimental increases in the potential flood affectation of other development or properties, and</p>	
<p>(c) incorporates appropriate measures to manage risk to life from flood, and</p>	
<p>(d) will enable safe occupation of and evacuation from flood prone land, and</p>	
<p>(e) is not likely to significantly adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses, and</p>	
<p>(f) is not likely to result in unsustainable social and economic costs to the community as a consequence of flooding, and</p>	
<p>(g) is consistent with any relevant floodplain risk management plan adopted by the council for the land in accordance with the Flood Risk Management Manual.</p>	
<p>(4) Development consent may be granted to development on land below the flood planning level only if the development –</p>	
<p>(a) does not involve earthworks that will affect flood storage capacity or flood behaviour, and</p>	
<p>(b) is not located in a floodway or flood storage area.</p>	

Relevant Considerations	Response
<b>Section 4.25 - Preservation of trees and vegetation in Environment and Recreation Zone and Cumberland Plain</b>	
<p>(4) Development consent under subsection (3) must not be granted unless the consent authority is satisfied that, in relation to the disturbance of native vegetation caused by the clearing –</p> <p>(a) there is no reasonable alternative available to the disturbance of the native vegetation, and</p> <p>(b) any impact of the proposed clearing on biodiversity values is avoided or minimised, and</p> <p>(c) the disturbance of the native vegetation will not increase salinity, and</p> <p>(d) native vegetation inadvertently disturbed for the purposes of construction will be re-instated where possible on completion of construction, and</p> <p>(e) the loss of remnant native vegetation caused by the disturbance will be compensated by revegetation on or near the land to avoid a net loss of remnant native vegetation, and</p> <p>(f) the clearing of the vegetation is unlikely to cause or increase soil erosion, salination, land slip, flooding, pollution or other adverse land or water impacts.</p>	<p>The development does not propose the disturbance of native vegetation.</p>
<b>Section 4.27 - Transport Corridor</b>	
<p>(1) Development consent must not be granted to the following development unless the consent authority has obtained the concurrence of Transport for NSW –</p> <p>(a) development on transport corridor land with a capital investment value of more than \$200,000,</p> <p>(b) development that involves the penetration of ground to a depth of at least 2 metres below ground level (existing) on land within 25 metres (measured horizontally) of transport corridor land.</p>	<p>The development involves excavation next to land proposed for the future Eastern Ring Road corridor. The Department has consulted with TfNSW and considered its advice in the assessment.</p>
<b>Section 4.28B - Aboriginal Cultural Guidelines</b>	
<p>Development consent must not be granted to development on land to which this Policy applies unless the consent authority has considered <i>Recognise Country: Guidelines for development in the</i></p>	<p>The Department has considered the <i>Recognise Country: Guidelines for development in the Aerotropolis</i> in <b>Section 6.4</b>.</p>

Relevant Considerations	Response
<i>Aerotropolis</i> published in November 2022 on the Department's website.	
<b>Section 4.39 - Development must be consistent with precinct plan</b>	
(1) Development consent must not be granted to development on land to which a precinct plan applies unless the consent authority is satisfied that the development is consistent with the precinct plan.	The proposal is considered to be consistent with the Precinct Plan as seen in <b>Table 14.</b>
<b>Section 4.42 – Consent authority to consider master plan</b>	
Development consent must not be granted to development on the following land unless the consent authority has considered the master plan or draft master plan – (a) land to which a master plan applies or is proposed to apply, (b) land shown on the Land Application Map that is adjacent to land to which a master plan applies or is proposed to apply.	The Department has considered the IPG Master Plan, which applies to the site and is satisfied the development is generally consistent with the provisions of the Master Plan.
<b>Section 4.49 - Public utility infrastructure</b>	
(1) Development consent must not be granted to development to which this Division applies unless the consent authority is satisfied that – (a) public utility infrastructure that is essential for the development is available, or (b) the public utility infrastructure will be available when required.	The Department has considered supply of utilities in consultation with key utility providers. The Department is satisfied that public utility infrastructure will be available to the development when required.

**Table 14 | Consistency with Precinct Plan**

Relevant Considerations	Response
<b>2 - Precinct vision and objectives</b>	
2.2 – Aerotropolis Core	The Precinct Plan envisions that the Aerotropolis Core Precinct will be a dense urban precinct planned around the Aerotropolis Metro station and the Wianamatta-South Creek Corridor system, generating significant employment through a broad range of industries across the precinct. The development proposes a highly automated distribution centre that will generate up to 585 operational jobs.

Relevant Considerations	Response
	<p>The proposal supplies significant warehousing and industrial space within proximity to Western Sydney Airport. The development has also been designed to connect to Country, while protecting and enhancing the Wianamatta-South Creek corridor, through the integration of appropriate stormwater treatment measures with supporting off-site infrastructure (see <b>Section 6</b>).</p>
<h3>3 - Infrastructure and Development Staging</h3>	
3.1 Infrastructure Delivery	<p>Requires the consent authority to be satisfied that suitable road access, water supply, sewer, electricity, high speed internet and stormwater infrastructure is in place. It also requires that development near future utility infrastructure be designed in accordance with the relevant owner's requirements.</p>
3.2 Development Sequencing	<p>The site is located within the First Priority Area in Figure 2 of the WSAPP.</p> <p>The Department consulted with relevant service providers as part of its assessment and considers that suitable infrastructure will be available when needed. The Department also consulted with TfNSW and Sydney Water to ensure the development meets their requirements for road and stormwater infrastructure.</p> <p>Conditions have been recommended limiting the commencement of construction until appropriate access roads and erosion and sediment control measures are operational. Operation is not permitted to commence until such time the necessary road and stormwater infrastructure is in place and operational. A section 73 compliance certificate is required from Sydney Water prior to the commencement of operation for the provision of water, stormwater and sewerage infrastructure servicing of the site. Electricity can be provided to the site via a new Endeavour Energy substation located to the south of the site, delivered as part of the IPG Master Plan. Endeavour Energy has provided its connection requirements to the Applicant.</p>
<h3>4 - Urban Structure</h3>	
4.1 Proposed Land Use and Structure Plan	<p>Requires the types of land use be consistent with the Precinct Plan's Land Use Plan and road networks generally consistent with the Transport Network Plan. It also requires development to provide high quality architectural and design outcomes.</p> <p>The development provides warehousing uses, which is consistent with the Enterprise use nominated under the Land Use Plan. The road network is also generally consistent with the Transport</p>

Relevant Considerations	Response
	Network Plan (see <b>Section 6.1</b> ). The proposal is also considered to display a high quality design outcome (see <b>Section 6.4</b> ).
4.2 Subdivision and Block Structure	<p>Requires block structure to be designed to enable delivery of efficient public and active transport, with large block patterns in the Enterprise zone.</p> <p>The proposal follows a road and block structure generally in accordance with the Precinct Plan, which also facilitates large-format warehousing reflective of the site's proximity to the WSI Airport. There are no active transport links provided within the development, as it is contained to the ALDI ADC development lots only, however, the development allows for a bus corridor and pedestrian links to bus stops on Road 3, which forms part of a bus corridor off Badgerys Creek Road, consistent with the IPG Master Plan.</p>
4.3 Aboriginal Culture and Heritage – Recognising Country	<p>Requires the development to protect area of cultural sensitivity and to ensure it is designed to care and connect to Country.</p> <p>The Department is satisfied the proposal has been designed to care for and connect to Country and have regard to Aboriginal cultural heritage (see <b>Section 6.4</b>)</p>
4.4 Non-Aboriginal and European Heritage	The site does not contain listed non-Aboriginal heritage items.
4.5 Blue-Green Infrastructure Framework	<p>Requires development to establish blue (i.e. water) and green (i.e. open space/vegetation) infrastructure in accordance with locations on the precinct plan.</p> <p>The development has been designed to protect the blue-green riparian corridors along Badgerys Creek to the west and the Central Riparian Corridor to the east of the site, which have been established as part of the IPG Master Plan blue-green network. The development includes generous landscaped setbacks to avoid overshadowing of these corridors and appropriate stormwater infrastructure to protect waterway health.</p>
4.5.1 Total water cycle management	<p>Requires water quality and quantity objectives and criteria be met. It also requires stormwater infrastructure be generally located in areas nominated by the Precinct Plan and that infrastructure be integrated with open space. It also requires stormwater assets are designed in accordance with Sydney Water's requirements.</p> <p>The Department has consulted with Sydney Water and CPHR to ensure water quality and quantity targets are met and that</p>

Relevant Considerations	Response
	infrastructure is designed in accordance with Sydney Water requirements (see <b>Section 6.2</b> ).
4.5.2 Riparian corridors	Requires riparian corridors of Order 2 or higher to be retained and rehabilitated, allowing for some realignment. No works are proposed within riparian corridors of Order 2 or higher.
4.5.3 Public domain and canopy cover	Requires open space to be provided as per the Precinct Plan, as well as provide park edge streets. Tree canopy is provided on-lot within the site, as well as landscaped amenity nodes and integrated with the office site entry. Canopy cover meets the minimum target of 15% set in the IPG Master Plan. There are no park edge streets within the development.
4.5.4 Biodiversity and vegetation corridors	Requires areas of high biodiversity value be protected (as defined under the Parkland City SEPP), ensure the reuse of native plants and relocation of native animals as well as ensuring landscaping and uses climate ready species. The site is bio-certified and does not contain any areas of high biodiversity value. The Department's consideration of biodiversity impacts is in <b>Section 4.6</b> .
4.5.5 Scenic and cultural connection	Requires ridgeline and hilltop vegetation to be preserved or reinstated. The site generally slopes up from west to east. The development incorporates generous landscaping around the perimeter of the development lot and enhances the creek to creek connection along Road 3, as discussed in <b>Section 6.4</b> .
4.6.1 Transport strategy	Requires the active and public transport be constructed in accordance with locations nominated in the Transport Network Plan of the Precinct Plan. The site sees an indicative bus route and cycle paths pass through the site. The development provides suitable connections with the active transport and public transport network in the DCP and Precinct Plan, as outlined in <b>Section 6.1</b> .
4.6.2 Street hierarchy and typology	Section 4.6.2 requires proposals to deliver collector and local roads in accordance with the indicative locations in the precinct plan and designed in accordance with the DCP.

Relevant Considerations	Response
	The site does not contain any collector or local roads. IPG will deliver Road 3, which is identified as a collector road, as part of the construction works being carried out under the approved Master Plan. The Department has considered the road locations in <b>Section 6.1</b> and consulted TfNSW and Council as the relevant road authorities, and concludes the proposed layout meets requirements of the Precinct Plan.
4.6.3 Development adjacent to protected transport corridors	The Department has consulted TfNSW about the development, within is located alongside the proposed Eastern Ring Road transport corridor. The Development does not include noise sensitive elements that need to be oriented away from the transport infrastructure.
4.7 Sustainability and Resilience	Section 4.7 requires the consent authority to consider whether the façade and roof are designed to reduce heat, including light coloured roofs, as well as ensuring plant does not direct heat towards open space and landscaping is designed to reduce solar heat absorption. The Applicant has provided a range of sustainable design initiatives, as outlined in <b>Table 11</b> . As outlined in ALDI's Sustainability Report and Net Zero Statement, ALDI are dedicated to achieving a sustainable, net zero future. As such, the Department considers the development to align with Section 4.7.
<b>5 - Land Use and Built Form</b>	
5.1 Hierarchy of Centres	Not applicable – no centres are identified to be located within the site.
5.2 Height	Section 5.2 requires building height to be no more than 52.5 m. The proposal sees maximum building height of 42 m, meeting this clause.
5.3 Floor Space Ratio	Not applicable to site.
5.4 Yield and Density	Not applicable to industrial development.
5.5 Temporary land uses	Not applicable – no temporary uses proposed.
5.6 Design Excellence	Not applicable as a master plan applies to the site

**Table 15** | Consistency with IPG Master Plan Controls (as relevant)

Relevant Considerations	Response
<b>Section 6.4 Height of Buildings</b>	

Relevant Considerations	Response
<p>Enterprise and Industry</p> <ol style="list-style-type: none"> <li>The height of buildings is not to exceed the maximum for the land shown on Figure 26.</li> <li>Within the areas mapped in Figure 26 as 'Potential High Bay Warehousing', only development for the purpose of high bay warehousing can achieve the maximum building height of 52.5m, subject to the Design Quality provisions in Section 14 of this Master Plan.</li> <li>Under this control, High Bay Warehousing is defined as warehousing related to a high bay warehouse operation above 24m in height.</li> <li>Any other warehouse development typologies that is not related to high bay warehouse operations are not to exceed a maximum height of 24 metres.</li> </ol>	<p>The maximum height of the development's high bay components is 42 m. Compliance with the design principles in the Design Quality Strategy have been demonstrated in the Design Verification Report submitted with the EIS.</p>
<b>Section 6.5.2 Building Setbacks</b>	
<p>Enterprise and Industry</p> <ol style="list-style-type: none"> <li>Indicative building GFA for the whole site (refer to Figure 28 and Figure 29) for the permissible land uses is to be generally in accordance with Table 5 below. Any future development, through the Complying Development pathway or Development Application process is required to demonstrate how development is consistent with the GFA allocation.</li> </ol>	<p>Figure 29 includes an indicative GFA of 106,418 m<sup>2</sup> for the development site.</p> <p>The development proposes a GFA of 106,706 m<sup>2</sup>.</p>
<b>Section 6.6 Building Setbacks</b>	
<ol style="list-style-type: none"> <li>Building setbacks for enterprise and industry land uses are to be consistent with Figure 30. Figure 30 requires a 20 m building setback from Road 3 for potential high bay warehouses, a 15m building setback from the central and western riparian corridors for potential high bay warehouses and a 20 m building setback to a classified road (future Eastern Ring Road), including a 10 m minimum landscaped area</li> </ol>	<p>Building setbacks comply with all requirements in Figure 30 of the Master Plan.</p>
<b>Section 6.11.1 Noise</b>	
<ol style="list-style-type: none"> <li>Any Noise Report that is prepared for a development application or proposal for complying development to be lodged under this Master Plan should have regard</li> </ol>	<p>The Department's consideration of noise impacts is in Section 6.3 of this report. The locations mapped in Figure 37 (Monitoring and Assessment Locations) and</p>

Relevant Considerations	Response
<p>to the locations mapped in Figure 37 and listed in Table 6, along with the associated noise criteria established for these areas within Table 7, Table 8 and Table 9.</p> <p>2. Consideration of the following design measures to mitigate noise impacts to surrounding sensitive uses is required:</p> <p>Western Parcel and Central Portion of the site</p> <ul style="list-style-type: none"> <li>• Consider intensive 24/7 operations including distribution centres and advanced manufacturing.</li> <li>• Consider utilising Central portion of the site for light industrial (bulky goods), commercial and retail uses</li> </ul>	<p>Tables 6 - 9 have been considered in the Department's assessment.</p> <p>The development proposes intensive 24/7 operation of an automated distribution centre which has the potential to generate significant noise emissions. The Department's assessment has found noise impacts can be appropriately managed and mitigated through the implementation of a range of feasible and reasonable noise mitigation measures, and if necessary, at-receiver treatments.</p>
<b>Section 6.11.3 Waste Management</b>	
<p>1. In accordance with good practice waste management, the following specific procedures is to be implemented for development within the Master Plan, where appropriate.</p> <p>2. Contaminated materials including fill materials and soils must be assessed by an appropriately qualified and experienced environmental consultant for remediation and management options.</p> <p>3. All asbestos and other hazardous waste must be handled according to appropriate legislation and regulation including the Work Health and Safety Regulation 2011 and disposed of in accordance with the SafeWork NSW and relevant EPA requirements.</p> <p>4. Any waste requiring off-site management must be classified in accordance with Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and transported to a facility lawfully authorised to receive, re-use and dispose of that waste</p>	<p>A Waste Management Plan has been prepared and is required to be implemented for the life of the development.</p> <p>Conditions require the Applicant to ensure only Virgin Excavated Natural Material, Excavated Natural Material, or other fill material approved in writing by the EPA is brought on site.</p> <p>An Asbestos Management Plan has been prepared is required to be implemented for the life of the development. Any asbestos encountered is to be handled, transported and disposed of in accordance with Safework and the Work Health and Safety Regulation 2017.</p> <p>Conditions require the Applicant to comply with these requirements.</p>
<b>Section 8.3.1 Open Space Delivery Plan</b>	
<p>1. Open Space within the Master Plan is to be delivered generally in accordance with the Open Space Delivery Plan in Figure 52.</p>	<p>Figure 52 (Open Space Delivery Plan) shows three on lot communal outdoor areas, one for each of the three development lots upon which the ALDI ADC is to be located.</p>

Relevant Considerations	Response
	As a single warehouse building for an individual tenant, the development incorporates one on lot communal outdoor area, generally in accordance with the location shown on Figure 52.
<b>Section 8.6 Landscaping</b>	
8.6.2 Tree Canopy Cover and Deep Soil 8.6.3 Communal Area 8.6.4 Tree Planting 8.6.6 Airport Safeguarding	The Design Verification Report confirms compliance with all landscaping requirements.
<b>Section 8.6</b>	
8.6.2 Tree Canopy Cover and Deep Soil 8.6.3 Communal Area 8.6.4.1 On Lot Planting Strategy	The Design Verification Report confirms compliance with all landscaping requirements.
<b>Section 9.4.2 Height</b>	
1. Development within the western parcel of the Master Plan is to comply with the height provisions of 52.5m set out in Height Control map in Figure 26. 2. High bay warehousing within the western parcel is to align with the built form parameters and height controls established in the indicative massing for high bay warehousing in Figure 98. 3. The portion of the high bay component over the warehouse ground floor footprint which can meet the maximum height provisions of 52.5m must not exceed 60% of the total warehouse footprint (see hatch area in Figure 98).	The maximum height of the development is 42 m and complies with the built form parameters and height controls for high bay warehousing. The high bay component represents approximately 38.3% of the total warehouse footprint.
<b>Section 9.4.3 Landscaping</b>	
1. The landscape interface treatment for the western Parcel, with the central riparian corridor to the east and Badgerys Creek corridor to the west, is to be designed in accordance with Figure 99. 2. For further landscape details on the western and central riparian corridor landscape designs, refer Section 8.4.1 and Section 8.4.2.	The development incorporates generous landscaped setbacks along the perimeter of the development, consistent with the requirements.
<b>Section 10.3 Public Art Complying Development Requirements</b>	
1. The delivery of the public art on the site is to follow the staged delivery of the Master Plan in accordance with the Staging Plan in Figure 108.	The Department notes that Figures 105 and 106 of the IPG Master Plan indicate that the Entry Artworks and

Relevant Considerations	Response
<p>2. For artworks located on Private Development Lots, the design and development of artworks will be triggered at the commencement of the concept design stage of that lot as indicated on Public Artwork Masterplan. Artworks are to be installed and completed prior to the award of OC (Occupation Certificate) for that Lot.</p>	<p>Riparian Corridor Artworks within Public Art zones B1 and B2 are located partially on the ALDI lot.</p> <p>The Department has recommended conditions requiring the Applicant to provide written evidence to the satisfaction of the Planning Secretary that confirms any public artwork within the site boundary, identified in Public Art Zones B1 and B2 on the approved IPG Master Plan are installed and completed in accordance with the Public Art Complying Development Requirements of the Master Plan and the Public Art Concept Development Application DA-28-2025, if approved</p>

## Appendix D – Recommended Instrument of Consent

The instrument can be found [here](#).