125 Nancy Ellis Leebold Drive, Bankstown Airport

URBIS

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We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

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CONTENTS

FIGURES

TABLES

Glossary and Abbreviations

Reference	Description
ABC	Airport Building Controller
ACHAR	Aboriginal Cultural Heritage Assessment Report
AAM	Advanced Air Mobility
Aeria	Aeria Management Group (previously Sydney Metro Airports)
AHD	Australia Height Datum
AHIMS	Aboriginal Heritage Information Management System
Airports Act / the Act	*Airports Act 1996* as amended
Air NEPM	National Environment Protection (Ambient Air Quality Measure)
ALC	Airport Lessee Company
ANEF	Australian Noise Exposure Forecast
BAL	Bankstown Airport Limited
BCA	Building Code of Australia
Building Control Regulations	*Airports (Building Control) Regulations 1996* as amended
CBD	Central Business District
CB DCP	*Canterbury-Bankstown Development Control Plan 2023*
CB LEP	*Canterbury-Bankstown Local Environmental Plan 2023*
CBLSPS	Canterbury-Bankstown Local Strategic Planning Statement
DA	Development Application
District Plan	*Our Greater Sydney 2056: South City District Plan*
DP	Deposited Plan
EPI	Environmental Planning Instrument
GA	General Aviation
GANSW	Government Architect New South Wales
GFA	Gross Floor Area
Green Paper	Aviation Green Paper
LGA	Local Government Area

Reference	Description
LOS	Level of Service
Master Plan	*Bankstown Airport Master Plan 2019*
MDP	Major Development Plan
NASF	National Airport Safeguarding Framework
NSW	New South Wales
OLS	Obstacle Limitation Surface
OTMP	Operational Traffic Management Plan
PANS-OPS	Procedures for Air Navigation Services – Aircraft Operations
Region Plan	Greater Sydney Region Plan: A Metropolis of Three Cities
SIDRA	Signalised & Unsignalised Intersection Design and Research Aid
Sydney Airport	Sydney Kingsford Smith Airport
WSA	Western Sydney Airport

Executive Summary

This report has been prepared in support of a Development Application (**DA**) for a change of use and alterations and additions to the existing warehouse and office building at 125 Nancy Ellis Leebold Drive, Bankstown Aerodrome.

The Strategic Planning framework designates the site as forming part of the Bankstown Aerodrome and the *Bankstown CBD and Bankstown Airport Collaboration Area*. The proposal will leverage Bankstown Airport's strategic location in Sydney's south-west by investing in an upgrade of the existing development to facilitate its use as a distribution centre for last mile delivery. The continued use of the site as a distribution centre will foster further economic activity of Bankstown Airport and assist in maintain its position as a major commercial centre in Canterbury-Bankstown and Greater Sydney as a whole.

The existing development contained within the site relates to a warehouse and office building which was approved as an 'airport freight facility' under the former *Bankstown Airport Master Plan 2004/05*. It was formerly occupied by warehousing and logistics operator 'Toll' and notwithstanding its categorisation as an airport freight facility, was used as a domestic warehouse and distribution centre.

The proposed change of use will facilitate the conversion of the approved use to a 'warehouse'*. A* warehouse represents the most appropriate categorisation under the prevailing land use framework established by the applicable *Bankstown Airport Master Plan 2019,* noting that an airport freight facility is no longer a defined land use under the Master Plan. Notwithstanding the change of use, the development in practice will continue to operate as a warehouse and distribution centre.

The alterations and additions will upgrade the existing warehouse and ancillary office, and rationalise the parking arrangements for the purpose of making the development suitable for the Proponent's operations. The alterations are considered to be minor and will not increase the scale of the development, intensify the use or give rise to additional environmental impacts as demonstrated by the supporting subconsultant investigations. For these reasons, the proposal is considered suitable for approval.

Site Description and Surrounding Context

The site is located at 125 Nancy Ellis Leebold Drive, Bankstown Aerodrome within the Canterbury-Bankstown Local Government Area (**LGA**). It is occupied by a single-storey warehouse, an attached two-storey ancillary office building and an open at-grade car park which is accessible from Nancy Ellis Leebold Drive. The site is afforded airside access, although its airside access arrangements are disused.

The broader Bankstown Aerodrome accommodates Bankstown Airport which the site adjoins to the north. Bankstown Airport represents NSW's largest General Aviation (**GA**) airport. The airport supports the majority of the State's Emergency Services aviation operations, flying school, small to medium air freight, aircraft maintenance, charter operations and private business flight operation. The *Aviation Green Paper* indicates that GA is an evolving and rapidly growing sector due to the introduction of new technology and a range of different business services. In light of this, it is anticipated that Bankstown Airport will continue to experience significant growth as a GA airport.

The peripheries of the Bankstown Aerodrome serve as business, commercial and industrial precincts which are designated as suitable for accommodating warehousing, commercial, industrial and technology-based industries. In light of this, the broader Bankstown Aerodrome is earmarked to emerge as a major commercial centre within the Canterbury-Bankstown region.

Bankstown Airport and the surrounding industrial and commercial precincts occupy Commonwealth land holdings which are managed by Aeria Management Group (**Aeria**) (formerly known as Sydney Metro Airports) who operates in the capacity as the Airport Lease-holder on behalf of Bankstown Airport Limited (**BAL**). BAL is the Airport Lessee Company under the Commonwealth Head Lease.

Being a commercially operated entity, the ongoing financial viability of Bankstown Airport is contingent on the ability to draw income from both aeronautical and non-aeronautical commercial development. In particular, non-aeronautical commercial development enables ongoing investment in aviation facilities and facilitates a return on investment for the Airport. In light of this, there is a need for airports such as Bankstown's to support a balance between aviation and non-aviation development.

Development Description

The DA seeks development consent for the following:

- Formalisation of the site's use as a 'warehouse and distribution centre';
- Demolition of existing dock office within warehouse to facilitate the flow of parcels from the sorter to dispatch area via two additional doors;
- Removal of existing gas tank to facilitate the construction of a trucker's lounge area;
- Widening of the existing crossover located central to the site;
- Construction of a car parking area with 23 spaces located in the south-western corner of the site;
- Removal of sections of the existing fencing and installation of a high chain-wire fencing with three strands of barbed wire along the southern site boundary to the taxiway;
- Inclusion of a signage zone;
- Closure of the existing fire brigade access point;
- Installation of Armco barriers and access gates along new vehicular access path to ensure safety and security;
- Construction of a free-standing lower-level awning along the southern elevation of the warehouse; and
- Reconfiguration of office areas and installation of material handling equipment for parcel distribution within the warehouse.

Planning Context

As the subject site is located within Bankstown Airport, it is located on Commonwealth land and is subject to the relevant Commonwealth legislation that applies to airport sites. This application provides a comprehensive assessment of the proposed development in accordance with the following legislation:

- *Airports Act 1996;*
- *Airports (Building Control) Regulations 1996; and*
- *Airports Regulations 1997.*

Further, this application has been assessed in accordance with the *Bankstown Airport Master Plan 2019*, with particular regard to the following items:

- Land Use Planning;
- Bankstown Airport Development Guidelines;
- Bankstown Airport Environment Strategy; and
- National Airports Safeguarding Framework.

Assessment of Key Issues

This report identifies and assesses the key environmental, social and economic impacts of the proposal and recommended measures to mitigate, minimise or manage these impacts. These include:

- Noise impacts and noise management;
- Wind impacts;
- Vehicular access and egress during the operational phase;
- Overarching social and economic impacts and benefits; and
- Aviation impacts and management.

A detailed environmental assessment of the above matters and the associated risks has been undertaken in the preparation of this DA package. It is considered that on balance, the benefits of the project significantly outweigh the risks.

Conclusion

The proposal seeks consent to formalise the site's use as a 'warehouse or distribution centre' by proposing a change of uses and makes provision for minor alterations and additions to the site's existing warehouse and distribution centre. The proposed alterations are minor in nature and will not alter the approved bulk; intensify the use; result in unacceptable traffic generation; or give rise to additional environmental impacts beyond those already approved in connection with the existing development. Furthermore, the proposed works will not compromise the safety or operational functionality of Bankstown Airport.

The proposal will upgrade and modernise the existing warehouse and ancillary office to ensure that it is suitable for the Proponent's operations. The proposal will facilitate greater private sector investment in Bankstown Airport to facilitate the generation of revenue for the airport.

Accordingly, it is submitted that the proposal is in the public interest and should be approved subject to appropriate consent conditions.

1. Introduction

This Planning Report has been prepared by Urbis Pty Ltd in support of a DA for alterations and additions and a change of use to the existing warehouse and ancillary office at 125 Nancy Ellis Leebold Drive, Bankstown Aerodrome.

The site consists of a single allotment which accommodates two separate warehouses. The site relates to the southern located warehouse which interfaces with airside land that forms part of Bankstown Airport. The site incorporates a small section of land owned by BAL.

The site is strategically located within the Bankstown Aerodrome and is designated as forming part its *Aviation Zone*, as identified by the *Bankstown Airport Master Plan 2019*. The site's existing warehouse and ancillary office was formerly used as a distribution centre by Toll. The proposal retains the development's use as a distribution centre to capitalise on the site's locational advantages and strategic positioning.

The proposed works have an estimated cost of $4,127,146.92 and development consent is sought in accordance with Part 5 of the *Airports Act 1996*.

This Planning Report is structured as follows:

- **Section 2 - Site Context:** identifies the site and describes the existing development and local and regional context.
- **Section 3 - Development Application Approval Process:** outlines the approval process relevant to DAs on airport sites.
- **Section 4 - Project History:** outlines the approvals history and pre-lodgement discussions with key stakeholders.
- **Section 5 - Need and Justification:** sets out the rationale, need and strategic justification for the proposal.
- **Section 6 – Proposed Development:** provides a detailed description of the proposal including the demolition, construction and operational phases.
- **Section 7 - Strategic Context:** identifies and analyses the State, regional and local strategic planning policies relevant to the site and proposed development.
- **Section 8 – Statutory Context:** provides a detailed assessment of the State and local environmental planning instruments and plans relevant to the site and development.
- **Section 9 – Consistency with Airport Master Plan 2019**: provides a detailed assessment of the proposed development against the *Bankstown Airport Master Plan 2019*.
- **Section 10 – Assessment of Key Issues:** identifies the potential impacts arising from the proposal and recommends measures to mitigate, minimise or manage these impacts.
- **Section 11 – Conclusion:** provides an overview of the development assessment outcomes and recommended determination of the DA.

This report should be read in conjunction with the supporting documentation listed in **Table 1**.

Table 1 Supporting Documentation

Document Title	Consultant
Survey Plan	Stantec
Cost Report	Stantec
Architectural Plans	SBA Architects
Traffic Impact Assessment	Stantec

Document Title	Consultant
Acoustic ANEF Assessment	Stantec
Aviation Impact Assessment	Aviation Projects
Operational Traffic Management Plan	Stantec
Wind Impact Assessment	Synergetics

2. Site Context

2.1. Site Description

The site is known as 125 Nancy Ellis Leebold Drive, Bankstown and located within the Canterbury-Bankstown LGA. It is located within Bankstown Aerodrome, on the northern side of the runways and interfaces with airside land.

The site is legally described as Lot 16 DP 1071297 and has an approximate area of 25,786.22m^2. It is occupied by two warehouses subject to independent lease arrangements. The warehouse to which the site relates is positioned in the southern portion of the allotment (herein referred to as '**the site'**. It was formerly occupied by major logistics operator Toll.

The site is irregular in shape and encompasses an area of land in the south-eastern portion that connects to Nancy Ellis Leebold Drive. This portion of land is external to the allotment to which the warehouse relates and is owned by BAL.

An aerial view of the site is shown in **Figure 1**. A series of site photographs are provided in **Figure 2**. A Site Survey is included at **Appendix A**.

Figure 1 Site Location

Source: Nearmap

2.2. Existing Development

As noted previously, the site accommodates two light industrial warehouses which are separately leased and operated. This application relates to the warehouse in the southern portion of the site.

The site accommodates a single-storey warehouse with an attached two-storey ancillary office building. This office building occupies the eastern portion of the site and interfaces with an open at-grade carpark. The carpark has historically accommodated staff and visitor car parking and is demarcated from Nancy Ellis Leebold Drive by secure fencing.

Vehicular access to the site is provided from an ingress/egress point off Nancy Ellis Leebold Drive. The site also accommodates a heavy vehicle access point positioned along the northern boundary which is shared with the northern located warehouse.

The site currently benefits from access to airside land along its southern boundary. The airside land is open to the site and demarcated only by line markings. The area between the site's boundary and the existing warehouse building line is classified as being part of the airport apron. It has the potential to be used for the manoeuvring and parking of aircraft. It directly connects to Taxiway A which forms part of Bankstown Airport.

Whilst the site is afforded access to airside land, the subject site as it currently operates has not utilised its airside access in recent years.

A series of site photographs are provided in **Figure 2**.

Figure 2 Site Photographs

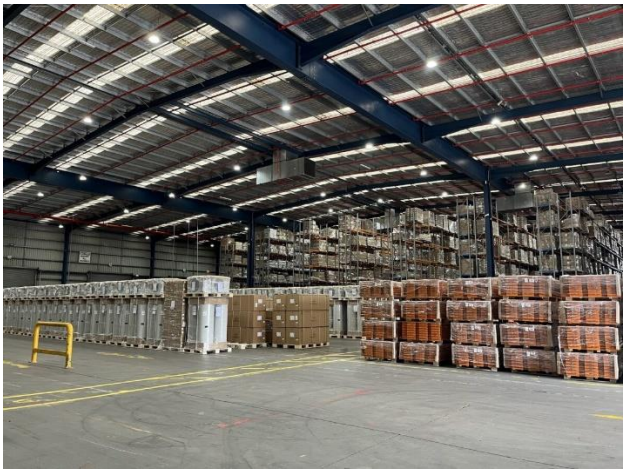
Picture 1 - Northern Shared Access Driveway

Picture 2 - Eastern Site Boundary and Vehicular Access

Picture 3 - Western Elevation of Warehouse

Picture 4 - Southern Warehouse Elevation

Picture 5 - Interior of Warehouse Showing Dock Office



Picture 6 - Image Showing Interior of Existing Warehouse

Picture 7 – Existing Car Park Facing South East

Picture 8 - Airport Apron Viewed Looking South East

2.3. Locality Context

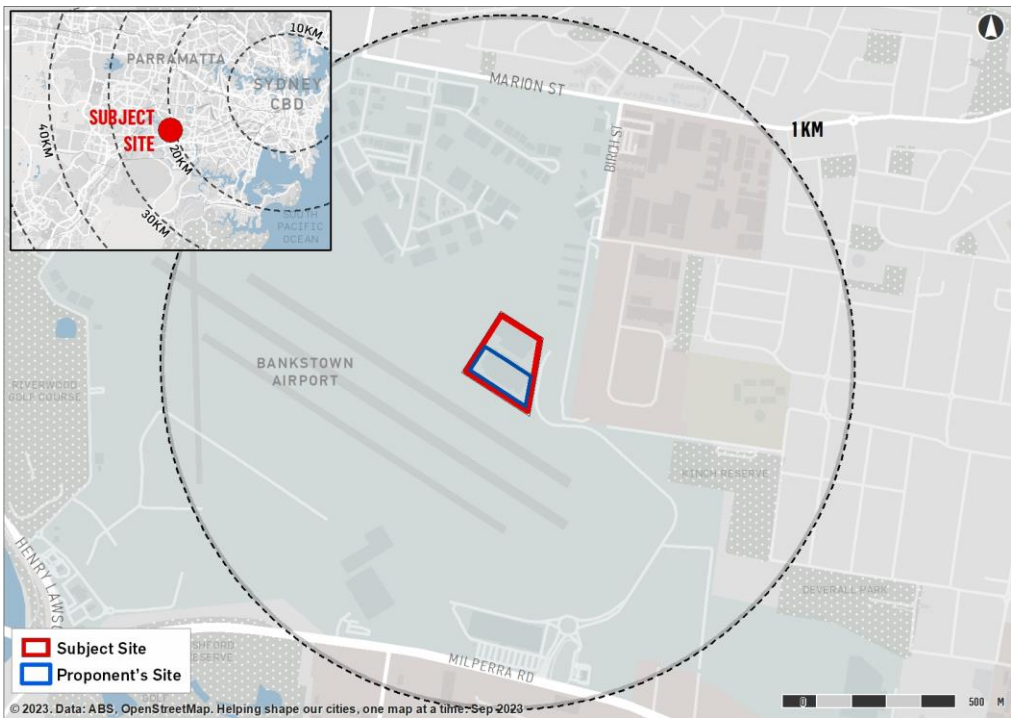
The site is located within Bankstown Aerodrome approximately 17km south of the Parramatta Central Business District (**CBD**) and 20km south-west of Sydney CBD (refer to **Figure 3**).

Bankstown Airport is the third busiest airport in Australia and the second busiest GA airport. The demand for GA aviation services is anticipated to continue to increase. In this context, the airport will experience significant growth and is earmarked to retain its status as a pre-eminent GA airport.

It is envisaged that Bankstown Airport's growth will occur alongside the operation of Western Sydney Airport at Badgerys Creek. Whilst Bankstown Airport will address the demand for GA, Western Sydney Airport will cater to domestic and international air travel which is anticipated to increase alongside population growth and the expansion of Greater Sydney.

The Bankstown Airport operates on a 24/7 basis with aviation activities include emergency services, air freight, flight training, general aviation, and charter flights. The airport and surrounding commercial and industrial precincts are a major commercial centre within Canterbury-Bankstown LGA and house over 160 businesses.

Figure 3 Regional Context



Source: Urbis/Nearmap

The surrounding development can be described as follows:

- **North**: To the immediate north of the site, on the same lot, is a single-storey warehouse which shares an access point with the subject site's warehouse for light and heavy vehicles. Further northward is the Aeromedical Crewing Excellence Training Centre which is a purpose-built flight training facility.
- **East**: To the immediate east of the site is Nancy Ellis Leebold Drive which permits access to the site. Further east lies a warehouse accommodating an aircraft maintenance facility. Beyond this the land uses consist of warehouse style buildings which accommodate range of light industrial uses that fall outside the bounds of the aerodrome.
- **South**: To the south lies airside land associated with Bankstown Airport. The site is demarcated from the airside land by line markings and fencing. To the immediate south, the site interfaces with a taxiway known as 'Taxiway A' which is used by aircraft to access Bankstown Airport's three runways located further southward of the site.
- **West:** To the west of the site are two grassed areas which are currently used to park aircraft. Further west is a helipad and additional paved areas for parking and manoeuvring aircraft.

The surrounding development is illustrated in **Figure 4**.

Figure 4 Surrounding Development

Picture 9 - Vehicular Access Point Looking West

Picture 10 – Southern view of Nancy Ellis Leebold Drive

Picture 11 - Eastern view of Nancy Ellis Leebold Drive

Picture 12 – Airport Apron, Taxiways and Runways

3. Approval Process

3.1. Statutory Context

The site is located within the Bankstown Aerodrome and by virtue of its positioning on Commonwealth Land is subject to the *Airports Act 1996 (***the Act**). The Act is the principal environmental planning instrument (**EPI**) that applies to the site.

Pursuant to Clause 68(1)(b) of the Act and clause 1.03 and Schedule 1 of the *Airport Regulations 1997*, the site is a designated 'airport site'. In turn, it is subject to the provisions of Part 5 of the Act which establish the regulatory arrangements relating to land use, planning and building controls for airport sites.

Section 70 of the Act identifies that each airport site is to be subject to its own master plan which sets out the strategic directions and compliance framework for assessing future developments. In light of this, the site is subject to the *Bankstown Master Plan 2019*. Clause 83A of the Act specifies that future development must also comply with the airport environmental strategy contained within a master plan. Pursuant to Section 84, the consent authority may grant approval to variations to the master plan.

Section 99 of the Act provides that an airport-lessee company, such as the Proponent, for an airport must obtain approval for an Airport-Lessee Consent (**ALC**) to carry out 'building activities'. Building activities encompass alterations to an existing building and the erection of new structures. As such, the proposed works, consisting of alterations and additions and the erection of new structures, require approval.

The *Airports (Building Control) Regulations 1996* (**Building Control Regulations**) supplements Part 5 of the Act and sets out a system for the approval of building activity on airports. Pursuant to clause 2.3(3), the consent authority for all new building activities and developments (excluding major development plans) on federally leased airports is BAL. In addition to obtaining consent from BAL, clause 2.02 of the Building Control Regulations requires that the applicant obtain approval from the Airport Building Controller (**ABC**) for a building permit. It is intended that approval for the building permit will be obtained subsequent to receiving the ALC.

Whilst development within Bankstown Aerodrome is subject to Commonwealth planning controls and approved under an environmental assessment process that is independent of most other development in New South Wales subject to the *Environmental Planning and Assessment Act 1979*, some consideration is still given to State and local planning policies, including the *Canterbury-Bankstown Local Environmental Plan 2023* (**CB LEP**).

The Act outlines that an airport Master Plan must be consistent with State and local planning controls and, as this DA is required to be consist with the master plan, the proposed works will be similarly compliant.

Building permit applications are not required to consider State and local environmental planning instruments (EPIs), however **Section 8** of this report contains a review of and assessment against key strategic and statutory planning documents for the purpose of providing a comprehensive assessment.

3.2. Bankstown Airport Master Plan 2019

The *Bankstown Airport Master Plan 2019* outlines the vision, objectives and strategic intent for the future development of the Airport. It sets out the planning framework applicable to Bankstown Airport, including land use planning objectives and zoning controls. The Master Plan is also accompanied by the *Bankstown Airport Development Guidelines*, which serves to guide the implementation of the Master Plan, and the *Bankstown Airport Environment Strategy*, which outlines the approach to managing and protecting the environment at the Airport.

Pursuant to Section 99 of the Act, all proposals must include a statement outlining the consistency of the proposal with a final airport master plan, and any non-compliance should be justified. This statement is included in **Section 9** of this report, whilst **Appendix B** contains an assessment against the provisions of the *Bankstown Airport Development Guidelines*.

3.3. Development Approval Process

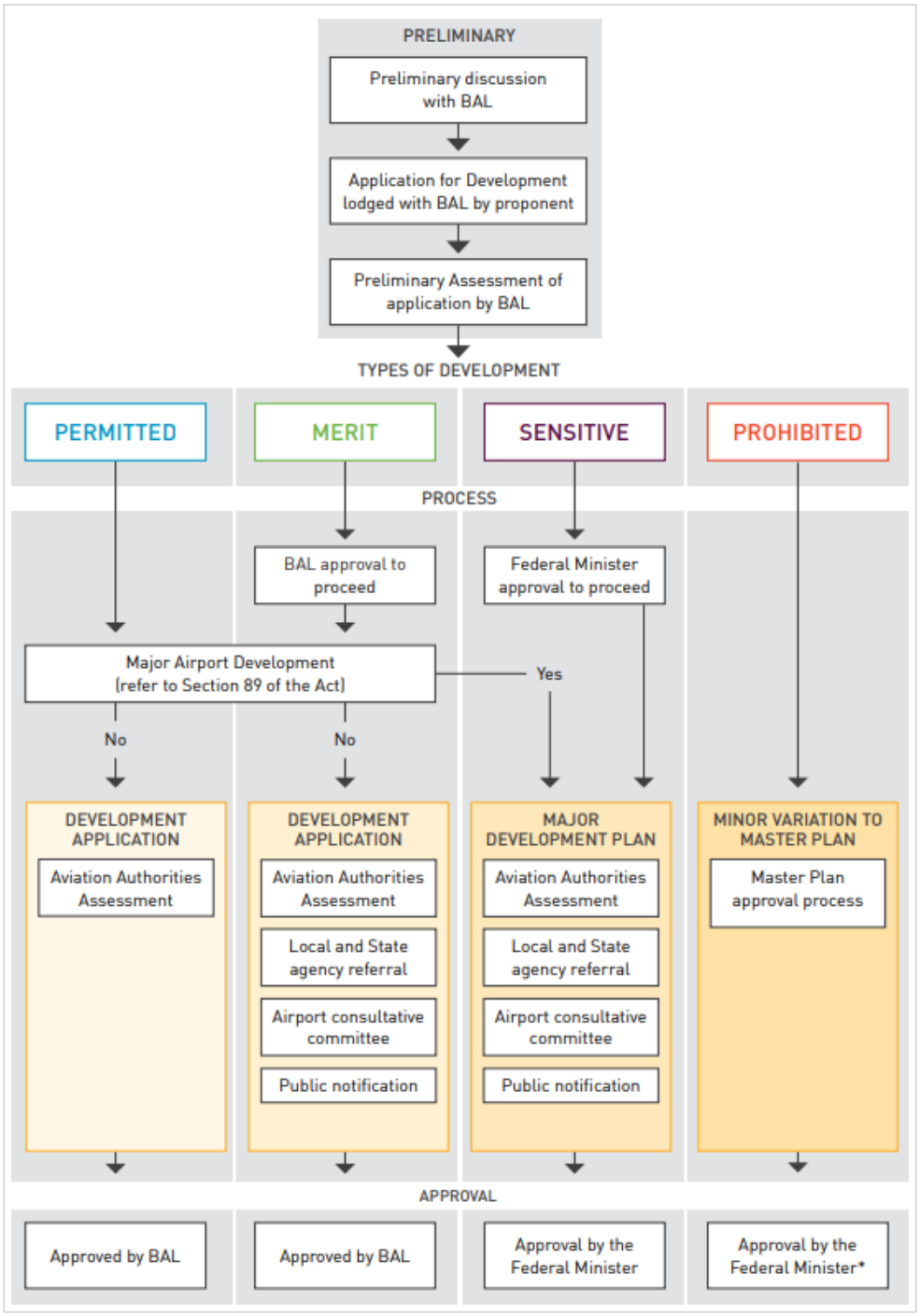
Consistent with the provisions in the Building Control Regulations, all developments and building activities proposed for airport sites are subject to approval. The approval is split into two separate but linked processes, being a DA approval (also known as an Airport Lessee Company (**ALC**) Approval) and an ABC Permit Approval.

The Act outlines that all building activities proposed for airport sites require approval from the ALC, which functions as the consent authority, and the ABC which functions as the building certifier. In the case of Bankstown Airport, the ALC is Bankstown Airport Limited (**BAL**).

The *Bankstown Airport Master Plan 2019* designates the site as forming part of the *Aviation Zone*. The associated land use framework identifies that the proposed land use, being a 'warehouse or distribution centre' and 'ancillary office' are a type of 'merit' development. Merit development is neither permitted nor prohibited in the Aviation Zone and may be approved subject to an assessment against the zoning objectives.

The general process required for merit development is outlined in **Figure 5** and involves a more rigorous assessment, including the submission of a DA, referral to relevant agencies and notification.

Figure 5 Development Approval Pathways



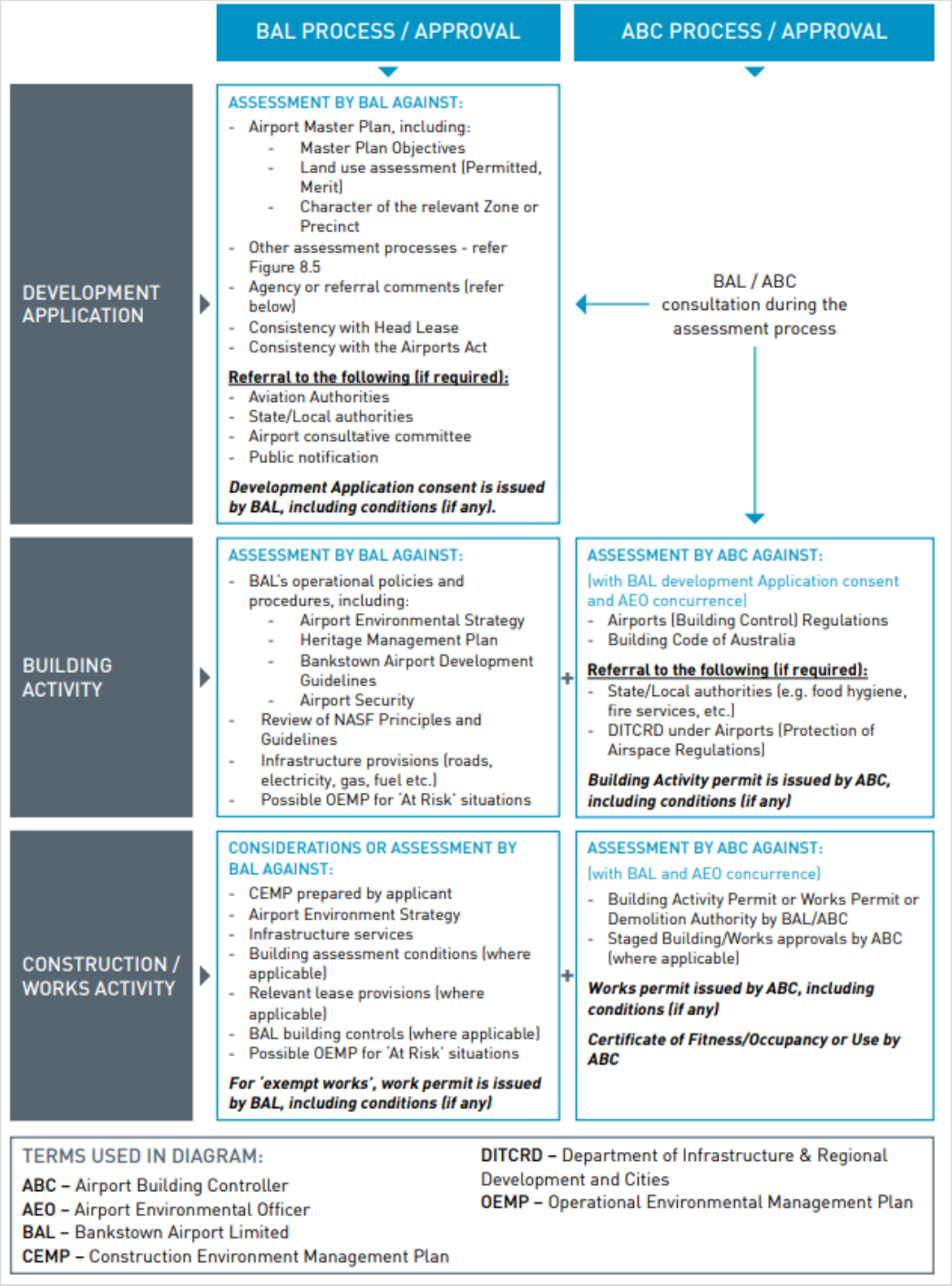
Source: Sydney Metro Airports

Figure 6 below outlines the process of obtaining approval for development/building activities on federally owned airport sites, with the DA and building activity sections being relevant to this proposal.

Throughout this process, consultation is required with both BAL and ABC to facilitate the submission of both a DA/ALC and an ABC Permit Application. The two approval processes can occur concurrently or via a staged approach, noting that BAL's consent is first required prior to the issuing of an ABC Permit Approval.

As noted in **Section 3.1**, this Proponent intends to stage the approval process so as to first receive DA approval from BAL, followed by a building permit from the ABC.

Figure 6 Development and Building Activity Application Process



Source: Sydney Metro Airports

4. Project History

4.1. Approvals History

The existing development contained within the site is subject to DA approval DA.2006.11 which was granted in 2006 as a deferred commencement approval. The consent relates only to the southern located warehouse to which the site relates and provided consent for the following:

'Construction of warehouse and office building, car park and landscaping'.

The development was subject to the *Bankstown Airport Master Plan 2004/2005* at the time of approval. Under the former Master Plan, it was located within the *Aeronautical Zone*. The proposed use was designated as comprising a 'airport freight facility' and was permissible with consent in the zone. It is noted that an airport freight facility is no longer a defined land use under the current *Bankstown Airport Master Plan 2019*.

The development was assessed under the provision of the *Airports Act 1996* and *Airports (Environment Protection) Regulation 1997*. It was deemed to meet the requirement to accord with the *Bankstown Airport Environment Strategy*.

The consent imposes conditions which continue to impact the operational aspects of the site. Key conditions include:

- Condition 10: To ensure fence security is maintained during operation, no plant, equipment, vehicles, etc are to be stored/maintained within 2m of an airside fence.
- Condition 54: At no time will any plant, equipment or personnel be permitted to be on airside land without prior approval from BAL.
- Condition 62: Vehicle movements to and from the site are restricted as per the table below:

	Vehicles In per hour	**Vehicles Out per hour**
Am	66	106
Pm	49	126

- Condition 63: The applicant is to provide sufficient access, internal site circulation and egress to ensure no impact on Stage 1 Ring Road or existing airport tenants.
- Condition 64: Walker Group Construction Pty Ltd are to provide adequate on-site parking for all staff, employees, visitors to the site, and as required by the development operations. No rights are granted to any other lots or areas on the airport for parking in association with the development operations.
- Condition 73: At completion, the development is to be permanently fenced on the airside interface with an approved person proof fence.

This proposal seeks consent for minor alterations and additions to the approved development. Approval for the amendments will be sought under a **DA** submitted to BAL (the Airport-Lessee) for approval.

4.2. Pre-Lodgement Discussions

During the pre-lodgement phase, the proponent has met with a range of stakeholders to discuss the application. These stakeholders include Bankstown Airport's ABC Consultant, AECOM, BAL and TfNSW. The outcomes of each meeting are addressed below.

Pre-lodgement Discussion: AECOM

The project team met with AECOM, as the independent assessors of DAs at the Airport, for a pre-lodgement meeting on 18 September 2023 to discuss the proposal. The meeting outcomes are addressed in the table below.

Table 2 AECOM Meeting Minutes and Response

AECOM Comment	Proponent Response
Two separate consents are required to be obtained, comprising of the ALC (planning consent) and the ABC (construction certificate) consent. The two consents must align in terms of documentation. These consents may be obtained concurrently, or the ALC consent can be obtained first followed by the ABC consent.	Noted. The proponent has chosen to obtain the DA/ALC approval prior to the ABC approval and therefore has opted for a staged approval process. The ABC Permit Application will be lodged concurrent with the ALC approval to allow works to commence on site as soon as possible. This DA report relates only to the ALC approval.
Any structure that is within a 1:35 plane taken from the centreline of the adjacent runway will trigger the need for a wind assessment, as per the National Airports Safeguarding Framework, Guideline B. The proposed awning will need to be assessed to confirm compliance with this control and determine whether wind modelling is required.	The Aviation Impact Assessment prepared by Aviation Projects confirms that the proposed building as a whole infringes on the 1:35 surface plane trigger. In turn, the existing building triggers the need for a detailed wind shear assessment. A detailed wind assessment would have been assessed as part of the existing development's approval process. The proposed free-standing awning is the only new building element. It sits below the height of the building's tallest element which reaches 23.15m. The Desktop Wind assessment prepared by Synergetics confirms that the awning will have no additional material impact on the wind conditions surrounding the site. Further discussion is provided in the Aviation Impact Assessment at **Appendix C** and the Desktop Wind Assessment at **Appendix I**.
Clarification was requested as to the operational requirements of the proposed development.	The proposed operational requirements are set out in the Operational Traffic Management Plan included within the Transport Impact Assessment at **Appendix D**. The operational requirements are also addressed in **Section 6.8**.
AECOM requested confirmation of the number of staff and delivery vehicles to be accommodated on the site at any one time and the traffic impacts to the intersection of Milperra Road and Nancy Ellis Leebold Drive.	The quantity of staff and delivery vehicles to be accommodated within the site at any one time is addressed in **Section 6.8** and the Transport Impact Assessment at **Appendix D**. The Traffic Generation Impacts to Milperra Road and Nancy Ellis Leebold Drive are addressed in **Appendix D**.
The proposed additional access road into the site must be justified as the site already has two access	Initially the scheme proposed a new crossover along the southern boundary. Since this time, the

AECOM Comment	Proponent Response
points from the primary frontage. The new access point must be approved by BAL.	Proponent has consulted with BAL regarding the location of the crossovers. The proponent is no longer considering the introduction of a third crossover along the southern boundary. Rather vehicles will enter and exit the site using the two existing crossovers. The crossover located centrally to the site will be widened and will be utilised only by delivery vehicles and staff/visitors. The northern located driveway will be dedicated to heavy vehicles. A detailed justification for the proposed vehicular access arrangements is provided in *Section 3.2* of the Transport Impact Assessment at **Appendix D**.
The DA should be accompanied by an Aviation Impact Assessment Report which discusses lighting, waste management, strategic justification and the *Bankstown Airport Development Guidelines*.	An Aviation Impact Assessment has been prepared by Aviation Projects and accompanies this DA at **Appendix B**. It assesses the impacts of the proposal in relation to aviation safety, including lighting impacts. The proposed development is assessed against the *Bankstown Airport Development Guidelines* at **Appendix B**. The strategic justification for the proposal is provided in **Sections 5** and **7** and waste management is discussed in **Section 9.1**.
The DA should also be accompanied by the following environmental impact assessment reports: ▪ Acoustic ▪ BCA and Access ▪ Traffic: should discuss both the proposed access point and the parking rates for the site.	This DA is accompanied by an Acoustic Report and a Transport Impact Assessment both prepared by Stantec at **Appendix E** and **Appendix D**, respectively. The ABC consultant has confirmed that there is no requirement for a BCA/Access Report. Notwithstanding, a Fire Engineers Report should be submitted alongside the ABC Permit Application to address any performance solutions.

Pre-lodgement Discussion: ABC Consultant

The team subsequently met with the ABC consultant on 28 September 2023 to discuss the building activity permit and staging of the application. A summary of the feedback is provided in the following tables.

Table 3 ABC Meeting Minutes and Response

ABC Comment	Proponent Response
Detailed architectural drawings commensurate with a Construction Certificate package are required for the ABC approval. The architectural details	As concurrent application process is being pursued, the proponent will submit a detailed application for both the ALC and ABC approvals.

ABC Comment	Proponent Response
associated with the ALC and ABC applications must be consistent.	
A cost of works must be submitted with the ALC and ABC applications.	A Cost of Works Report prepared by Stantec accompanies this application at **Appendix J**.
The ABC consultant clarified that a BCA/access report is not required but a fire engineers report including performance solutions should be submitted.	It is envisaged that a Fire Engineers Report and any proposed building solutions will be submitted alongside the ABC Permit Application.
ABC consultant queried how any existing sprinkler system would operate in conjunction with the proposed awning.	The sprinkler system will not be impacted by the proposed awning. This will be demonstrated at the time of obtaining an ABC Certificate.
Approval for the material handling equipment (MHE) system can be sought under the ABC permit application. Considering the low height of the MHE conveyor and the understanding that no modifications to the existing fire protection services will be required, the MHE installation is unlikely to raise concern from an ABC approvals perspective.	Noted. Consent for the MHE will be sought under the ABC Permit Application.
It is possible for an ABC permit to be staged. If this route is pursued, the ABC application be accompanied by a letter setting out the staging process and the scope of works for each phase.	Concurrent approval for both the ABC and ALC application will be obtained. As such, a staged ABC permit will not be sought.
The ABC consultant advised that approval for a security CCTV system could be sought under either the ABC permit or an ABC exemption.	It is envisaged that approval for the CCTV system will be sought as part of an ABC exemption.
The following documentation is required to accompany the ABC application: ▪ Consent issued by ALC; ▪ Detailed architectural drawings including proposed finishes; ▪ Protection statement which outlines precautions to protect persons and property from damage due to building activity; ▪ Drawings and design certificates for each of the disciplines (i.e., structural, civil, hydraulic, electrical, fire services, etc); ▪ Fire Engineering Report; ▪ Section J Report; and	Noted. This documentation will be submitted with a future ABC Permit Application.

ABC Comment	Proponent Response
▪ Endorsed pack from Bankstown Airport Environment Heritage, and Sustainability Manager.	

TfNSW Pre-Lodgement Discussion

The proponent and its project team met with TfNSW on the 17 October 2023 to discuss the traffic arrangements associated with the proposal.

At this meeting the project team's traffic consultant provided an overview of the preliminary traffic findings, including the traffic generation associated with the proposal and the impacts to nearby intersections. TfNSW were advised that the results accounted for recently constructed developments in the surrounds, including the newly delivered south-western precinct which was fully operational at the time of assessment.

TfNSW provided no comment on the proposed crossover arrangements, noting that the driveway design would have no impact on a TfNSW owned road. TfNSW did not raise concern with the transport modelling and assessment completed to date.

BAL Pre-lodgement Engagement

On the 16 October the project team met with Aeria Management Group which operates in the capacity as the Airport Lease-holder on behalf BAL. At this meeting, the Proponent was advised that AECOM would be responsible for assessing the application and that Aeria Management Group would be responsible for overseeing commercial matters. The proposed cross-over formed the key point of discussion.

5. Need and Justification

The site is located within the Bankstown Aerodrome and forms part of the *Bankstown CBD and Bankstown Airport Collaboration Area*. The location is highly strategic as it functions as a significant employment generator and accommodates important commercial and industrial land supporting a mix of office, industrial and aviation related industries. In accordance with the *Bankstown CBD and Bankstown Airport Collaboration Area Place Strategy*, the collaboration area is earmarked to emerge as a thriving industrial precinct with a strong aviation sector anchored by emergency air services, training facilities that foster innovation. Under this strategy, the Bankstown Airport is anticipated to continue to thrive as an integrated commercial and aviation centre.

Bankstown Airport operates as NSW's leading GA airport. It supports most of the State's emergency services aviation operations and accommodates major aviation training centres as well as small to medium air freight. Whilst Australia has experienced a decline in GA activities, new technology and innovation is allowing the sector to evolve. GA now leverages new technologies associated with agriculture, surveillance, rescue operations and emergency health. In this context, Bankstown Airport is earmarked to play an integral role in supporting long-term health of the State's GA sector.

The *Aviation Green Paper* was released recently September 2023 and prepared to inform the *Aviation White Paper* to be publicised in mid-2024. It identifies that GA continues to face a number of challenges. Most notably there is an overt tension between aeronautical and non-aeronautical development at GA airports, with an increasing pressure to convert aviation uses to commercial.

The proposal seeks consent for a change of use to a warehouse and distribution centre that operates independent of the airport. As such, it seeks to facilitate non-aeronautical development at a GA airport. Whilst the existing development was approved to operate as an aviation freight facility, it should be recognised that in recent years the tenant has not utilise the site's airside access arrangements. In consequence, its operations were more consistent with that of a ground-based domestic distribution centre.

The proposal seeks to continue the site's existing functions as a ground-based domestic distribution centre and proposes works limited to minor alterations that will facilitate the delivery of a modernised facility capable of supporting last mile delivery**.** In consideration of this, the change of use sought by this DA merely formalises the site's current use as a warehouse and distribution centre.

The proposal will not undermine Bankstown Airport's status as the State's pre-eminent GA airport. Whilst the proposal relates to a non-aviation use, its operations are not antithetical to the airport's functions. In particular, the proposal represents a continuation of the site's existing operations and will not compromise aviation safety or other aeronautical related functions. Furthermore, the proposed changes are reversible, meaning future tenants will still be able to leverage the site's access to airside land.

It is important to acknowledge that in searching for a tenant for the site, a demand has not been identified for an aviation freight facility. Since 80% of all air freight in NSW is carried in the cargo hold of passenger aircraft, which Bankstown Airport cannot accommodate, Sydney Airport and the future Western Sydney Airport are positioned to be the most significant air freight hub in NSW.

The physical changes to the warehouse provide the opportunity to attract additional commercial investment to Bankstown Airport. The Aviation Green Paper highlights that income derived from non-aviation uses is integral to supporting the financial viability of the Airport. Specifically, it notes the following with respect to aerodromes:

> '*Expansion of commercially operated airports is underpinned by their ability to draw income from non-aeronautical commercial development. This development further enables investment in aviation infrastructure and provides a necessary return on investment for the airports. It is important that a balanced approach between aviation and non-aviation development is undertaken to sustain the growth and development of the aviation sector over the long term.'*

The proposal optimises the opportunity to transition an under-utilised air-based distribution centre to a ground-based distribution centre that provides for a more productive and efficient use of the site whilst generating revenue to the Airport. In this regard, the proposal will be of significant benefit to the airport.

6. Proposed Development

6.1. Project Description

This proposal relates to minor alterations and additions to the site's existing warehouse and office building and seeks to formalise its use as a 'warehouse or distribution centre'.

The proposal seeks consent for the following works:

- Formalisation of the site's use as a 'warehouse and distribution centre';
- Demolition of existing dock office within warehouse to facilitate the flow of parcels from the sorter to dispatch area via two additional doors;
- Removal of existing gas tank to facilitate the construction of a trucker's lounge area;
- Widening of the existing crossover located central to the site;
- Construction of a car parking area with 23 spaces located in the south-western corner of the site;
- Removal of sections of the existing fencing and installation of a high chain-wire fencing with three strands of barbed wire along the southern site boundary to the taxiway;
- Inclusion of a signage zone;
- Closure of the existing fire brigade access point;
- Installation of Armco barriers and access gates along new vehicular access path to ensure safety and security;
- Construction of a free-standing lower-level awning along the southern elevation of the warehouse; and
- Reconfiguration of office areas and installation of material handling equipment for parcel distribution within the warehouse.

The proposed alterations are shown in the Architectural Plans is provided at **Appendix F**.

6.2. Project Overview

The key components of the proposed development are summarised in **Table 4**.

Table 4 Project Details

Descriptor	**Project Details**
Site Description	The site is located in the southern portion of Lot 16 DP 1071297. The leased area associated with the subject warehouse has an approximate area of 25,786.22m^2.
Project Description	The project comprises the construction of internal and external alterations and additions to the existing warehouse and ancillary office building. The proposal also seeks consent for a change of use from an 'aviation freight facility' to a 'warehouse or distribution centre' as defined by the *Bankstown Airport Master Plan 2019*.
GFA	Total Gross Floor Area (**GFA**) of 9,357m^2, broken down as follows: ▪ Warehouse: 7,172m^2 ▪ Office: 2,185m^2

Descriptor	Project Details
Maximum Height	The maximum building heights for the existing warehouse and proposed free-standing awning are as follows: ▪ Building - RL 23.150 / 12.2m / 79.95 ft AMSL) (excluding exhaust plant); and ▪ Awning – 16.44m AHD (53.94 ft AMSL) and 17.29 m AHD (56.7 ft AMSL at the higher side of the awning.
Parking Spaces	The proposal seeks consent for a total of 158 on-site car spaces (inclusive of 2 existing accessible spaces). Of this 23 additional spaces are proposed within a new car parking area in the south-western corner of the site.
Loading Bays	The proposal seeks consent for the following loading arrangements: ▪ 10 inbound loading bays ▪ 90 outbound loading trucks
Staff Numbers	Typical staff numbers will range of 70 – 100 staff at any one time on any given day.
Operational Hours	24 hours / 7 days per week
Cost of Works	$4,127,146.92

6.3. Proposal Description

The proposal comprises minor alterations and additions to an existing warehouse and ancillary office building as well as the installation of a free-standing awning and additional docks. To facilitate the proposal, minor demolition works are required.

The proposal will continue to operate as a distribution centre. The Distribution Centre will support last mile delivery operations. A detailed description of the proposal is addressed in the section below.

A time-limited development consent is sought to limit the length of time the proposed use can operate on the site. Prior to the expiry of the relevant period, a further DA would be required to continue the use of the site as a warehouse and distribution centre.

6.4. Proposed Change of Use

The existing development on the site was approved as an airport freight facility under DA.2006.11. This land use was initially defined under the *Bankstown Airport Master Plan 2004/2005* and there is no corresponding definition under the current Bankstown Airport Master Plan 2019.

The proposal removes airside access and will operate independent of the Airport. As the proposal does not relate to an aviation activity, a formal change of use is required. Due to this, the proposal seeks consent for a change of use from an ‘airport freight facility’ to a ‘warehouse or distribution centre’. The approved use as an ‘office premises’ will remain unchanged.

With reference to the land use definitions set out in the master plan, a warehouse or distribution centre is defined as follows:

> ‘*A building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made*’.

Office premises are defined as follows and are a type of 'commercial premises':

> '*A building or place used for the purpose of administrative, clerical, technical, professional or similar activities that do not include dealing with members of the public at the building or place on a direct and regular basis, except where such dealing is a minor activity (by appointment) that is ancillary to the main purpose for which the building or place is used'*.

The proposed uses constitute a type of 'merit development. In consequence, the uses are permissible with consent in the Aviation Zone subject to a merits assessment. Further discussion regarding the merits assessment is provided in **Sections 9.1** and **9.2.**

6.5. Demolition

Demolition works are proposed to facilitate the delivery of the proposed alterations and additions. The demolition works consist of the following:

- Removal of the existing dock office within the warehouse;
- Demolition of the gas tank in the south-west of the site;
- Removal of portions of the existing fencing in the south-western and southern boundary;
- Demolition of internal partitions within the ancillary office to facilitate the proposal; and
- Removal of windows and louvre screens from the southern warehouse elevation.

The proposed demolition works are illustrated on the Architectural Plans prepared by SBA Architects at **Appendix H**.

6.6. Alterations and Additions

6.6.1. External Alterations

Proposed external alterations to the existing warehouse include the following:

- Construction of two (2) additional door openings on the southern face of the building;
- Creation of a new entrance to the building with double doors;
- Provision of a 'trucker's lounge' adjacent to the south-west corner of the warehouse with external and internal access points; and
- Construction of a free-standing awning is proposed along the southern elevation of the warehouse.

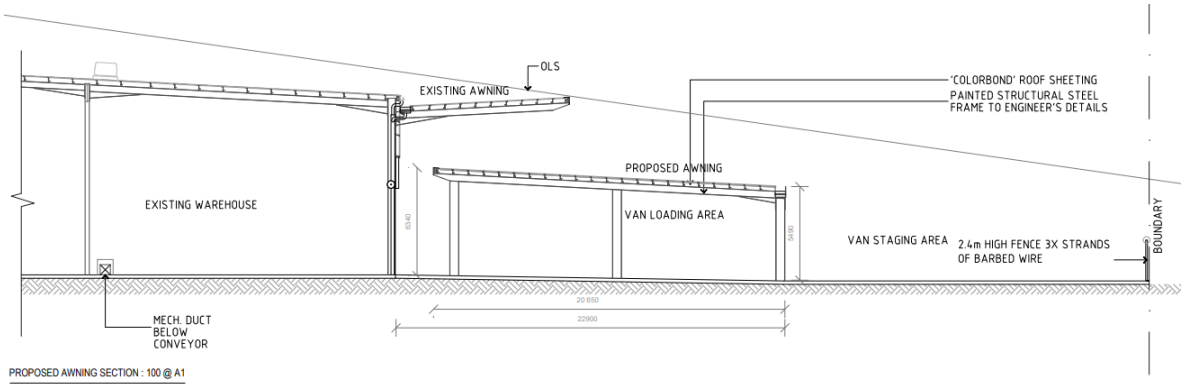
The external alterations are confined to the envelope and will not increase the bulk or scale of the approved development.

6.6.2. Free-Standing Awning

The free-standing awning is proposed along the southern elevation of the warehouse on what is currently part of the airport apron. This awning will have a variable height between 5.5 metres and 6.3 metres, as shown in **Figure 7**.

No changes are proposed to the existing warehouse awning which will continue to provide weather protection to the van loading area.

Figure 7 Section Plan Showing Proposed Free-standing Awning



Source: SBA Architects

6.6.3. Fencing

Fencing is proposed along the western and southern site boundaries. The fencing along the southern aspect of the site will restrict access to airside land.

The fencing will be 2.2 metres high and have three strands of barbed wire in accordance with the requirements of the *Bankstown Airport Design Guidelines*. This fencing will be accompanied by the installation of new Armco barriers and access gates to ensure safety and security.

6.6.4. Internal Design Changes

The proposal includes minor internal layout changes to both the office and warehouse, including:

- Relocation of existing amenities and lobby spaces;
- Installation of alarmed doors in various locations within the building for security and to restrict access; and
- Minor fitout works within the warehouse to suit the specifications of the proponent's distribution service.

6.6.5. Signage

The proposal seeks consent for the approval of a signage zone. The proposed signage zone is positioned on the south-eastern elevation of the ancillary office building adjacent to the building entry, as shown on the Architectural Plans at **Appendix F**.

The signage zone is rectangular in shape with length of 8,500mm and height of 2,500m. It is anticipated that the signage will display business/building identification signage using open lettering. Consent for the detailed design of the signage, including any proposed illumination, will be sought from BAL/the ABC at a later date.

6.7. Parking and Access

6.7.1. Car Parking

The development proposes a total of 158 car parking spaces consisting of:

- 135 existing car spaces (including 2 accessible); and
- 23 proposed parking spaces in the proposed south western located car park.

The proposed quantity of parking and loading spaces has been determined with respect to the operational requirements of the warehouse and distribution centre.

The proposed parking spaces comply with the requirements of the Australian Standard for *Off-Street Car Parking (AS2890*). The proposed location of parking is illustrated in the Architectural Plans at **Appendix F**.

6.7.2. Loading

The development proposes 100 loading bays consisting of:

- 10 existing truck loading bays; and
- 54 van loading and 24 van staging spaces.

The proposed loading spaces are distributed between dedicated inbound and outbound loading areas. The inbound area is proposed to be located on the western side of the site towards the rear of the warehouse and will occupy the existing loading area.

The outbound area is proposed to be positioned to the south of the site (refer to **Appendices F** and **D**). The outbound area is separate into two areas consisting of the 'van loading' area and the 'van staging' area. Delivery vehicles will wait within the van staging area before being directed into the van loading area. The outbound area will accommodate up to 90 delivery vehicles at anyone time.

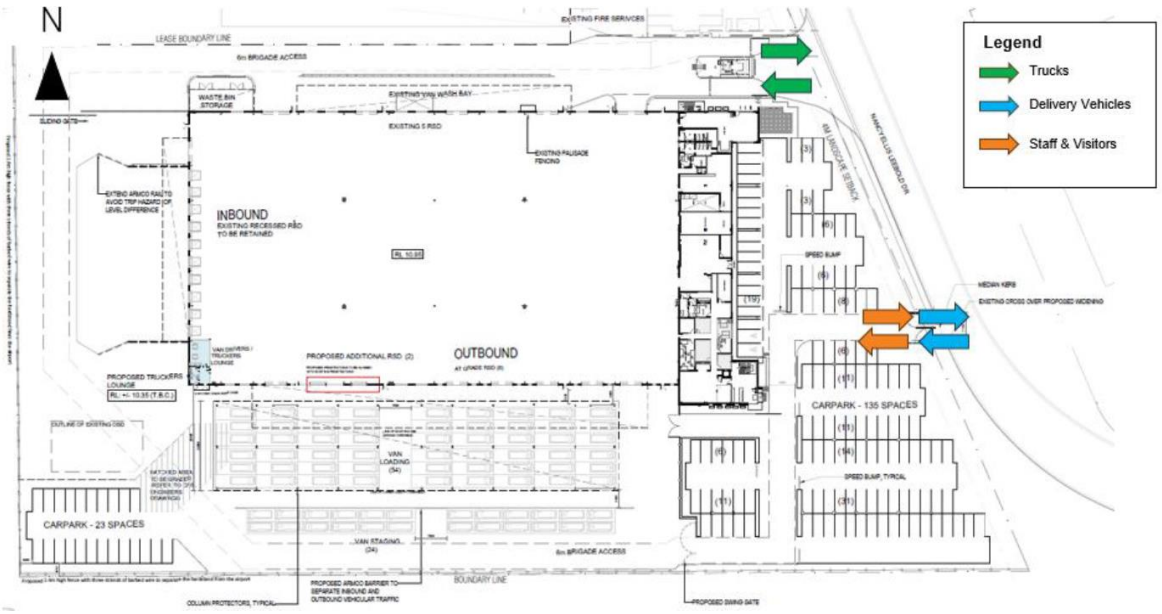
6.7.3. Vehicular Access Arrangements

The proposal utilises the existing two vehicular crossovers accessible from Nancy Ellis Leebold Drive. These crossovers consist of the following:

- **Northern Driveway:** A driveway point located along the northern boundary which will be dedicated to heavy vehicles to facilitate access to the western located inbound docks.
- **Central Driveway:** A centrally located crossover for delivery vehicles, staff and visitors. It will provide delivery vehicles with access to the outbound docks situated along the southern aspect of the site. This vehicular point will be widened to facilitate ease of access.

These two crossovers will facilitate the separation of light and heavy vehicles. The Proposed movement paths for heavy and light vehicles are shown in **Figure 8**.

Figure 8 Proposed Vehicle Movements and Access Driveways Within Site



Source: Stantec / SBA Architects

6.8. Use and Operational Details

Proposed Uses

As addressed above, the proposal seeks approval for the use of the existing development as a 'warehouse or distribution centre' as defined by the *Bankstown Airport Master Plan 2019*. The existing office component

will be used by the development's tenants and will remain ancillary to the primary 'warehouse or distribution centre'.

Activities and Operations

The Proponent is responsible for operating a last mile distribution network. Its goal is to efficiently transport packages straight from the warehouse direct to the customer.

The proposal will facilitate the following key activities on the site:

- **Warehouse Activities** – Distribution activities will occur from the warehouse with the goal to efficiently transport packages straight from the warehouse direct to the customer.
- **Vehicle Types** - Heavy vehicles (inbound delivery) will consist of 20 metre articulated vehicles (AVs). Delivery vehicles (outbound delivery) will be limited to cars and vans, such as the Mercedes Benz Sprinter Panel Van or similar.
- **Vehicle Movements**: Vehicle movements and circulation arrangements will consist of the following:
  - **Light Vehicles** – Light vehicles typically associated with staff and visitors will access the site from the existing centrally located crossover.
  - **Delivery Vehicles** - Delivery vehicles will enter and exit the site via the driveway crossover located central to the site and will travel to the van loading area located in the site's southern aspect. Delivery vehicles will access the site during dispatch periods.
  - **Access for Heavy Vehicles -** During dispatch periods and non-dispatch periods, heavy vehicles will enter and exit the site via the driveway located along the northern boundary.
- **Parking** – The proposal will accommodate 158 on-site parking spaces (inclusive of 2 existing accessible spaces) for staff and visitors. These spaces are distributed across with existing at-grade car park located in the eastern portion of the site and the proposed parking area in the south western corner of the site.
- **OTMP** – Drivers will be made aware of the Operational Traffic Management Plan (**OTMP**) that applies to the site. The OTMP will be reviewed annually and will be addressed as part of the staff induction program.

Further discussion regarding the above traffic management procedures is provided in the Operational Traffic Management Plan (**OTMP**) prepared by Stantec at **Appendix J**.

6.9. Stormwater Management

The proposal will rely on the existing stormwater system provided by the site. No increase in impervious areas and associated runoff is proposed as part of this application. Stantec have provided a discussion on the existing stormwater system which is included at **Appendix G**.

7. Strategic Context

7.1. Greater Sydney Region Plan: A Metropolis of Three Cities

The *Greater Sydney Region Plan* (the **Region Plan**) provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability. The proposal is consistent with the following relevant objectives of the Region Plan as outlined below:

- *Objective 4: Infrastructure use is optimised*

To deliver on the above objective, the Region Plan establishes the need to maximise existing infrastructure assets by better utilising existing assets. The proposal maximises asset utilisation by repurposing an existing warehouse for a contemporary distribution centre that supports technology and last mile delivery.

The proposal will not undermine the ongoing operation of Bankstown Airport and its continued use of aviation related infrastructure. Supporting subconsultant investigations which accompany this report confirm that the proposal will not compromise the safety of its operations or interfere with its aviation related activities.

Additionally, the proposal will not hinder its ongoing economic viability of Bankstown Airport. The statutory and strategic planning framework governing the future development of the airport indicates that it is earmarked to support both aviation and non-aviation uses. In light of this, non-aviation activities have become an increasingly important part of BAL's business. Investment from non-aviation uses assists in increasing operational revenue for the Airport and is essential to ensuring it has the capacity to invest in new aviation activity. In this regard, the proposal represents the opportunity to attract further investment that will support the ongoing viability of the airport.

Whilst the warehouse was approved as an airport freight facility, the former owner Toll has suspended its airside activities in recent years and the existing facility has ultimately operated as a domestic distribution independent of the Airport. The proposal seeks to continue this use, with the alterations and additions proposed for the purpose of modernising and adapting the development to the Proponent's operations.

Given that the site's airside access has not been utilised in recent years, it is arguable that the proposal does not in practice technically represent the conversion of an aviation related use, with this being an 'airside freight facility', to a non-aviation use.

- *Objective 16: Freight and logistics network is competitive and efficient.*

The proposed development aligns with this objective as it will facilitate an efficient and productive distribution centre which will strength NSW's logistics network and improve its capability for last mile delivery, particularly in the Greater Western Sydney Region. It will also leverage Bankstown Airport's position as a key link in the freight and logistics network.

- *Objective 23: Industrial and urban services land is planned, retained and managed.*

The proposal retains the site's approved warehouse and ancillary office, and will be used for the purposes of a distribution centre. It therefore retains the site's existing employment generating functions.

7.2. Six Cities Discussion Paper

The *Six Cities Discussion Paper* builds upon the idea of the 'Metropolis of Three Cities' presented in the Greater Sydney Region Plan by extending it to the Lower Hunter and Greater Newcastle, Central Coast, and Illawarra-Shoalhaven regions to create six interconnected cities. The Discussion Paper is not government policy or a strategic planning document. Notwithstanding it does however indicate the future direction that strategic planning in NSW can be expected to follow.

The Discussion Paper outlines six 'region shapers' which are priority areas that will guide future strategic planning work. Of relevance to this application is the priority to achieve 'a connected Six Cities region'. This priority requires that in the medium term, Sydney's three international airports be operate as a system of global economic gateways.

To achieve this priority, the Discussion paper nominates the following goal:

- *A Connected Six Cities Region: Linking freight, ports and airports for economic growth*

The proposed development will benefit freight and logistics activities in NSW by facilitating last mile delivery and strengthening connections in south-west Sydney. It will also facilitate economic activity and growth for Canterbury-Bankstown and Sydney as a whole. Whilst the proposed development will not operate with any airside activity, the proposed works are designed to be reversible in nature. As such, the proposed development does not remove any connection between air and road freight activities at Bankstown Airport.

7.3. Our Greater Sydney 2056: South City District Plan

The South District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

The planning priorities and actions likely to have implications for the proposed development are listed and discussed below:

- *Planning Priority S1: Planning for a city supported by Infrastructure.*

As addressed above, the proposal will continue to support the financial viability of Bankstown Airport by attracting private sector investment to the Bankstown Aerodrome. Furthermore, the proposal will not undermine the status of Bankstown Airport as a premier GA airport nor will it compromise its day to day operations.

- *Planning Priority S8: Growing and investing in health and education precincts and Bankstown Airport trade gateway as economic catalysts for the District.*

The proposed development provides the opportunity for further investment in Bankstown Airport. This investment provides for a more efficient use of the site and will improve the productivity outcomes it is capable of generating in the post-operational phase, as well as facilitate job growth. This will contribute to the role of Bankstown Airport as an economic hub and catalyst for growth in the South District.

- *Planning Priority S10: Retaining and managing industrial and urban services.*

The proposal retains the site's existing zoning and therefore protections and manages important industrial and urban services land. The alterations and additions will facilitate the future occupation of the site which is integral to fostering job creation and generating private sector investment in the airport.

7.4. Canterbury-Bankstown Employment Lands Strategy

The Canterbury-Bankstown Employment Lands Strategy aims to guide future growth and support the delivery of employment in Canterbury-Bankstown LGA. The Strategy identifies that Bankstown Airport plays an important role as a major commercial centre and is a key employment anchor within the Canterbury-Bankstown region.

In this regard, the proposed development will continue to support the Airport's role as it will increase employment generation and promote efficient logistics activities, thereby assisting in developing Bankstown Airport as a major commercial centre in Canterbury-Bankstown and broader Greater Sydney.

7.5. Canterbury-Bankstown Local Strategic Planning Statement

Connective City 2036: Canterbury Bankstown Local Strategic Planning Statement (**CB LSPS**) is a 20-year vision and framework to guide land use planning and decision making for the future of Canterbury-Bankstown LGA.

One of the key directions within the CB LSPS is to focus on the development of the 'Bankstown Aviation and Technology Precinct'. The LSPS identifies that the Airport will remain an aviation hub but will also further develop its logistics industry. Freight activities will be supported by Council and TfNSW investment into road upgrades to the M5 Motorway and the Hume Highway.

Additionally, the CB LSPS identifies ten evolutions to support the key directions of the document which centre around a variety of areas including industry, liveability and environment. Each evolution includes planning priorities, with the following priority being relevant to the proposed development:

- *Planning Priority E3.6: Protect and enhance employment lands.*

This Planning Priority includes a specific action to review land uses surrounding Bankstown Airport to encourage advanced manufacturing, aviation and logistics and encourage higher quality development outcomes.

The proposed development will facilitate a high-quality and efficient logistics development which will increase the economic potential of Bankstown Airport and enhance employment within the precinct. As such the proposed development is consistent with the CB LSPS and will benefit the economy and job growth in Canterbury-Bankstown.

7.6. Bankstown CBD and Bankstown Airport Collaboration Area Place Strategy

The *Bankstown CBD and Bankstown Airport Collaboration Area Place Strategy* is a strategic planning document which outlines a vision for the region into a health, academic, research and training precinct. It was jointly created by the NSW Government and Canterbury-Bankstown Council, as well as other major stakeholders including Bankstown Airport.

The plan acknowledges the importance of the Airport as an employment centre and envisages a potential public transport link between the Airport and Bankstown CBD to improve accessibility. The planning priority most relevant to the proposed development is outlined below:

- *Priority 5: Foster Bankstown's assets and its innovative and entrepreneurial culture.*

This Planning Priority includes an action to grow Bankstown Airport as a significant aviation, technology, industrial and employment precinct. The proposed development will result in the delivery of a significant number of new jobs which will assist in developing Bankstown Airport's role as an employment precinct. Additionally, the proposal will contribute to the growth of freight and logistics activities at the Airport.

7.7. Aviation Green Paper

The Commonwealth Government released an *Aviation Green Paper* (**the Green Paper**) in September 2023 which discusses the current state of the aviation sector and outlines key challenges and opportunities. The Green Paper seeks to facilitate feedback from stakeholders on aviation matters and will be used to develop the Aviation White Paper which will establish the policy direction for the aviation sector to 2050.

The White Paper is set to be released mid-2024 and is intended to guide continued recovery of the Australian aviation industry from the COVID-19 pandemic and maximise opportunities for growth, innovation and sustainability.

The Green Paper primarily focuses on increasing safety and competition in the passenger aviation sector, improving regional and remote aviation services, transitioning to net zero and embracing technological advancements in aviation.

In relation to air freight, the Green Paper highlights that there has been unprecedented demand for air freight in recent years, driven by increases in e-commerce volumes. A key concern for the future development of

the air freight industry is improving coordination between airport and off-airport (i.e. road and sea) freight networks and preventing the encroachment of incompatible land uses on existing or future freight corridors.

The proposed works are not considered to be incompatible with air freight activities, as they are designed to be reversible and can be removed in future to reinstate airside access to the site if deemed suitable by a future tenant or the Airport. Additionally, the Green Paper acknowledges the transformative role that the opening of Western Sydney Airport may have for the airfreight industry due its proximity to freight and intermodal facilities in Western Sydney and the absence of a curfew, unlike Sydney Airport. This suggests that Bankstown Airport's role in the air freight industry will be decreased due to the competition Western Sydney Airport presents.

The Green Paper acknowledges the important role of GA activities. In light of this, the Bankstown Master Plan 2019 identifies that Bankstown Airport 2019 is envisaged to maintain its status as NSW's pre-eminent general aviation airport.

The Green Paper acknowledges that GA activities are evolving in response to technological changes. In particular, future technologies which may revolutionise air freight movements, include drones and Advanced Air Mobility (**AAM**) services, such as electric vertical take-off and landing aircraft. Due to the reversible nature of the proposed works, the proposed development does not preclude the Airport from leveraging any of these emerging technologies.

7.8. South West Precinct Major Development Plan

A Major Development Plan (**MDP**) for the South West Precinct of Bankstown Airport was made in 2019 to support the proposed development of a major industrial/logistic and innovation precinct on previously undeveloped land.

Whilst this document is not applicable to the subject site, it does identify that there is a lack of sufficient available industrial land in Greater Sydney relative to a growing demand, noting that in 2018 it was predicted that there was only enough industrial land in Greater Sydney to match demand for the next 4 years.

The MDP notes that there is increasing demand in Greater Sydney for well-located logistics and warehouse facilities in proximity to major road networks and transport hubs. This demand is driven by factors such as the desire for shorter delivery time requirements. It also identifies that sites for intermodal facilities generally need to be two hectares or more.

The subject site meets this criteria as it is located in a key location in south-west Sydney in proximity to Milperra Road, and has a site area of approximately 2.5ha, making it appropriate for the proposed distribution centre development.

8. Statutory Context

The section assesses the proposed development against the relevant Acts, environmental planning instruments, draft environmental planning instruments, and development controls plans.

The relevant State and Local planning instruments that apply to the site and the proposal include:

- *Airports Act 1996*
- *Airports Regulations 1997*
- *Airports (Building Control) Regulations 1996*
- *Canterbury-Bankstown Local Environmental Plan 2023*
- Bankstown Airport Master Plan 2019
- National Airports Safeguarding Framework

Table 5 addresses the statutory instruments and requirements and provides an assessment against the relevant matters for consideration.

Table 5 Compliance with Relevant Statutory Requirements

Statutory Instrument	**Compliance**
Airports Act 1996	The site is located within the Bankstown Aerodrome and, by virtue of its positioning on Commonwealth Land, is subject to the Act. The Act is the principal environmental planning instrument that applies to the site. Pursuant to Clause 68(1)(b) of the Act and clause 1.03 and *Schedule 1* of the *Airport Regulations 1997*, the site is a designated 'airport site'. In turn, it is subject to the provisions of Part 5 of the Act which establish the regulatory arrangements relating to land use, planning and building controls for airport sites. Clause 99 of the Act establishes that all 'building activities' require approval under Part 5 of the Act. The proposed works relate to minor alterations and additions to an existing building and consequently would be classified as 'building activities' that require approval. Division 6 of the Act imposes restrictions on lessees. Section 32 of this division prevents an airport lessee from carrying out non-airport business. Specifically, subclause 32(1) requires that an operator must not carry out substantial trading or financial activities other than: *a) Activities relating to the operation and/or development of the airport,* *b) Activities incidental to the operation and/or development of the airport, or* *c) Activities, that under the regulations, are treated as activities incidental to the operation and/or development of the airport, or* *d)* ***Activities that are consistent with the airport lease for the airport and the final master plan for the airport****.* Subclause 32(1)(d) is of relevance to the application. The proposal remains consistent with the head lease agreement and the final master plan.

Statutory Instrument	Compliance
	An assessment against the Master Plan is provided in **Appendix B**. Subject to a merits assessment of the proposed land uses and alterations and additions, the proposal is entirely consistent with the Master Plan. The proposal is also consistent with the Head Commonwealth Lease Agreement which is included under a Separate Cover. Clause 3.1 specifies the types of activities that may be permitted on the Lessee. Subclause 3.1(b) specifies the Lessee must: *(i)* ***Permit the Airport Site to be used for other lawful purposes that are not inconsistent with its use as an airport****; and* *(ii)* *Subject to sub-clause 5.10 and clause 14, construct, alter, remove, add to or demolish the structures.* The proposal relates to a 'warehouse or distribution centre' and an 'office premises' which will operate independent of the Airport. Whilst the proposed operations are independent, they are not antithetical to the aviation activities of the airport given that they will not prevent or impede its future operation. For this reason, the proposed activities are consistent with the requirements of Division 6 of the Act.
Airports Regulations 1997	The Act needs to be read in conjunction with the *Airports Regulations 1997*. Pursuant to Clause 1.03 (and *Schedule 1*) of the *Airport Regulations 1997*, the site is a designated 'airport site'. In turn, it is subject to the provisions of Part 5 of the Act which establish the regulatory arrangements relating to land use, planning and building controls for airport sites. Most provisions within Part 5 relate to the preparation of draft and final master plans. As the proposal pertains to the preparation of a DA, it is not subject to these provisions.
Airports (Building Control) Regulations 1996	The *Airports (Building Control) Regulations 1996* (**Building Control Regulations**) supplements Part 5 of the Act and sets out a system for the approval of building activity on airports. Clause 2.03(1) of the Building Control Regulations prescribes that if the applicant for a building approval is not the ALC, as is the case for the subject proposal, the applicant must provide the ALC with a copy of its application. The airport-lessee must then provide its consent or consent subject to conditions. The Proponent will follow the appropriate approval process to obtain the consent from BAL via the submission of a DA for the proposed works. Clause 2.02 requires that all building activities obtain a separate permit approval from the Airport Building Controller (**ABC**), which functions as the building certifier. Clauses 2.05 - 2.07 establish the provisions which must be complied to obtain approval of a building permit. Compliance with these requirements will be demonstrated in the future ABC Permit Application to be submitted concurrent with the DA/ALC approval to allow works to commence as early as possible.

Statutory Instrument	Compliance
Bankstown Airport Master Plan 2019	The *Bankstown Airport Master Plan 2019* provides a vision and objectives to guide future development within the Airport. The consistency of the proposed development with the master plan is discussed further in **Section 9**. The *Bankstown Airport Development Guidelines* which accompany the master plan and provide detailed controls for development within the Airport are addressed in **Appendix B.**
National Airports Safeguarding Framework	The *National Airports Safeguarding Framework* (**NASF**) is a national land use planning framework which aims to enhance the current and future safety, viability, and growth of aviation operations at Australian airports. The relevant NASF guidelines include: e) NASF Guideline A: Measures for Managing Impacts of Aircraft Noise f) NASF Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports g) NASF Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports h) NASF Guideline F: Managing the Risk of Intrusions into the Protected Operational Airspace of Airports i) NASF Guideline G: Protecting Aviation Facilities – Communication, Navigation and Surveillance (CNS) j) NASF Guideline I: Public Safety Areas (PSAs) A detailed assessment against the relevant guidelines can be found in **Appendix H**.
Canterbury-Bankstown Local Environmental Plan 2023	As the subject site is located within an airport site, local planning controls, such as the CB LEP and the *Canterbury-Bankstown Development Control Plan 2023*, do not apply. The *Bankstown Airport Master Plan 2019* is required to be consistent with these local controls under the Act. The consistency of this proposal with the Master Plan, and subsequently the local planning controls, is discussed in the following section. Under the CB LEP, Bankstown Airport, including the subject site, is zoned *SP2 Infrastructure (Air Transport Facility)* to provide for airport operation and associated land uses on the site. The proposal is compliant with this zoning as it is ancillary to the Airport. No height or floor space ratio controls apply to the site under the CB LEP. Bankstown Airport is listed as a local heritage item (*I18 Bankstown Aerodrome*) for its regional strategic importance during the 1940s. The heritage impact of the proposed development is discussed in **Section 10.5**.

9. Consistency with the Master Plan

The *Bankstown Airport Master Plan 2019* (the **Master Plan**) is the principal planning document that applies to airport sites. It establishes the 20-year strategic direction for the airport and the land use, environmental and planning assessment framework to ensure that future aviation and non-aviation related developments are compatible with the functions of the airport.

The Master Plan aligns with the NSW planning regime and considers the provision of the *Canterbury Bankstown LEP 2023*. The Act requires that DAs demonstrate consistency with its requirements.

It is considered that the proposal is generally consistent with the requirements of the Master Plan. The proposal's consistency with the relevant provisions is discussed in the sections below.

9.1. Master Plan's Vision and Objectives

The Master Plan outlines a vision for the future growth and development of the airport. This vision aims to facilitate the holistic development of both aviation and non-aviation uses. The vision statement is as follows:

> '*Bankstown Airport is a dynamic integrated aviation and commercial centre for Sydney, including a home for emergency services, general aviation, training, logistics and destination retail.*'

The proposal is consistent with the aspiration for the airport to emerge as an integrated aviation and commercial centre. The proposal will retain the site's existing operations as a distribution centre. It will upgrade the existing development and associated facilities to deliver a contemporary distribution centre that supports state-of-the art technology. By revitalising the site, the proposal will increase employment generation in Canterbury Bankstown; attract investment in the Bankstown Aerodrome; and increase the economic output of the airport.

Table 6 addresses the proposal's consistency with the relevant objectives nominated by the Master Plan for development within Bankstown Aerodrome.

Table 6 Bankstown Airport Master Plan 2019 Objectives

Objective	**Proposed Development**
Aviation: A centre of excellence for aviation k) Provide a home for general aviation and emergency service aviation; l) Grow flight training and other aviation training activities; m) Enhance existing aviation infrastructure; n) Ensure the safety, security, reliability and efficiency of aviation operations; and o) Safeguard aviation operations from incompatible development, both on and surrounding the Airport	The proposed development seeks to repurpose an existing warehouse historically already used for distribution purposes. The proposal will not impede on the ability to protect and grow aviation uses within the Bankstown Aerodrome and therefore is not antithetical to the zoning objectives which aim to foster the growth of its aviation functions. Specifically, the proposal: p) Will not have any adverse impacts on the safety or efficiency of the Airport. q) Is not incompatible with existing aviation operations as it represents a continuation of the site's existing use. r) Does not preclude the opportunity to enhance aviation infrastructure in the Aerodrome; and s) Will not disrupt the safety, security and reliability of existing aviation operations. Further discussion of the impact of the proposed development on aviation activities at the Airport can be found in **Section 10.3**.

Objective	Proposed Development
Economy: Creating more jobs and contributing to Western Sydney growth t) Continue to develop the Airport as a major economic and employment hub within the Bankstown and South Western Sydney regions u) Deliver aviation and non-aviation property development opportunities at the Airport, including the South West Precinct in the Commercial Zone v) Accommodate a major transit node on the Airport for the future Sydney Metro Southwest extension from Bankstown to Liverpool stations	The objective highlights the need to deliver both aviation and non-aviation property development opportunities at the airport. The proposal will deliver on this objective by facilitating the growth of non-aviation activities within the Bankstown Aerodrome. These activities will foster economic and employment growth.
Environment: Continue to build a culture of responsibility in every aspect of our business w) Demonstrate environmental stewardship and responsibility in all Airport operations x) Achieve a balance between the development and operations of the Airport and mitigation of environmental impacts	The proposed development relates only to minor alterations and additions to an existing warehouse and ancillary office building. Additionally, the site is not located within an *environmentally significant area* identified within the Master Plan. The supporting environmental investigations that accompany this report demonstrate that the proposal will not result in unacceptable environmental impacts. The proposed activities are comparable to the operational activities historically accommodated on the site. In this regard, the proposal will not give rise to unacceptable amenity impacts, including acoustic impacts. The Transport Impact Assessment included at **Appendix D** demonstrates that the operational requirements and provision of parking is appropriate and will not give rise to unacceptable traffic generation. Specifically, the intersection of Milperra Road and Nancy Ellis Leebold Drive will continue to operate at a satisfactory 'C' and 'B' level of service (**LOS**) during the AM and PM peak periods, respectively. Thereby the proposal will have no adverse impact on the surrounding environment. The Aviation Assessment included at **Appendix C** and the Desktop Wind Assessment at **Appendix I** confirm that the additional built form structures, such as the free-standing awning, will not give rise to unacceptable wind impacts. Further**,** compliance with the *National Airports Safeguarding Framework* can be readily achieved.

Objective	Proposed Development
	Appropriate waste management measures will be implemented at the occupation phase to minimise the attraction of wildlife to the site. The proposal will be equipped with the following waste management facilities: ▪ General waste bins (240L and 1100L) ▪ Cardboard bins 1100L ▪ Soft plastics (1100L) ▪ Workplace recycling (240L) Waste bins will be accommodated internal to the development. Specifically, bins will be provided in the breakout rooms and offices. Waste bins will also be located external to the building adjacent to the north western warehouse façade.
Community: A good neighbour y) Continue to be a good neighbour by working closely with the Canterbury-Bankstown, Fairfield and Liverpool councils and supporting the local community z) Support local employment and jobs growth in Western Sydney	The proposed development will not adversely impact surrounding communities. Construction impacts will be appropriately managed through *a Construction Management Plan* to be developed at the construction phase. The proposal is isolated from sensitive residential uses and will not give rise to acoustic or traffic impacts and therefore will not compromise the amenity of the surrounding area. The proposal will optimise the site's operational potential, thereby fostering employment growth for Western Sydney, investment and potentially revenue for the airport. The proposal will have a positive impact on the community including through direct and indirect local job creation. As the distribution centre will primarily service the local area and Western Sydney, it will also encourage job growth to remain within the local community.

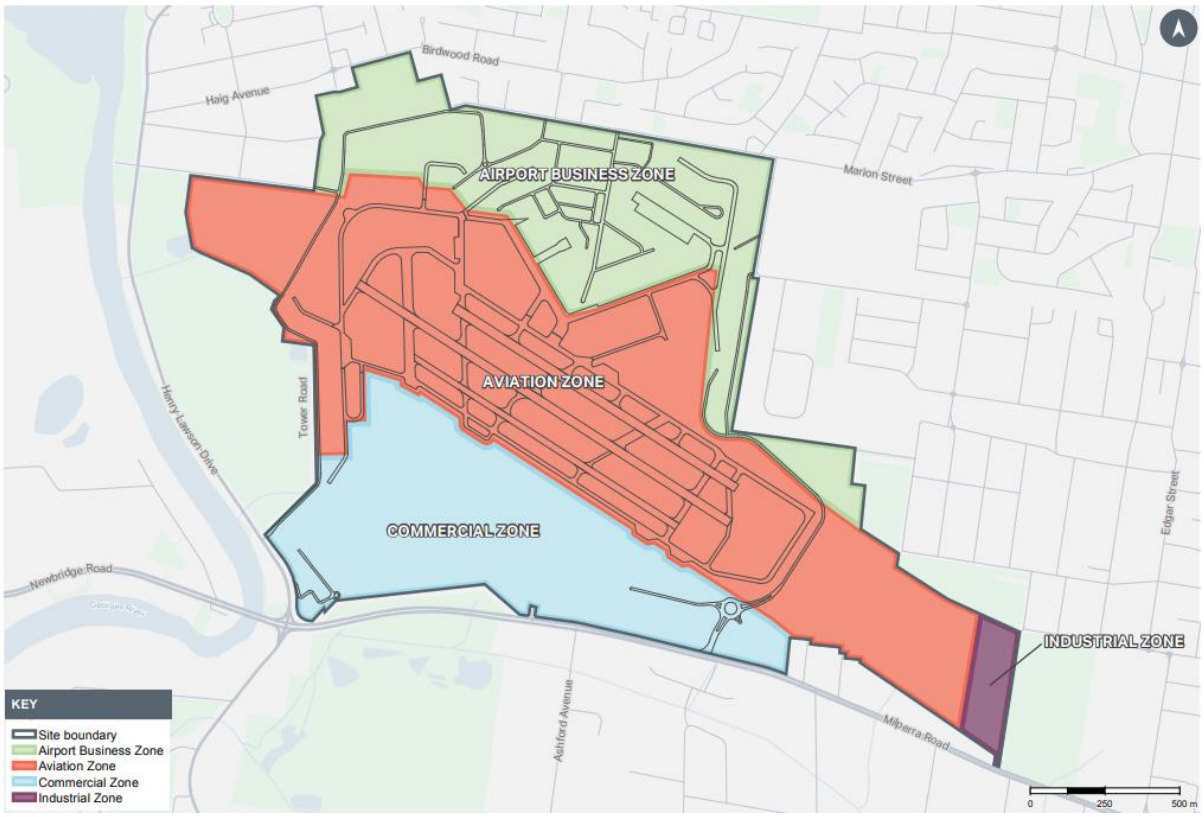
9.2. Aviation Zone and Desired Future Character

The Master Plan designates the site as forming part of the Aviation Zone which encompasses an area of 155.2ha within the Bankstown Aerodrome (refer to **Figure 9**).

The Aviation Zone is situated in the central spine of the airport and accommodates airport runways, taxiways and parts of the apron, including some of the aviation facilities north of the runway.

The proposed development is classified as a 'warehouse or distribution centre' under the Master Plan's land use framework and incorporates an ancillary 'office premises'. Neither of these uses are identified as being permitted or prohibited within the Aviation Zone, and as such may be approved through a merit approval process.

Figure 9 Bankstown Airport Zoning Map



Source: Bankstown Airport Limited

The Master Plan outlines that the desired future character of the Aviation Zone is as follows:

> *The Aviation Zone is an area of the Airport which will continue to develop for the operation and movement of aircraft and associated activities.*
>
> *Development within the zone will continue to focus on the aviation needs of the Airport, with ancillary and related support facilities developed to enhance Airport operation. This will involve continued maintenance and improvement of aviation infrastructure.*

Whilst the proposed development does not involve an aviation use, the proposed works are not antithetical to the desired future character of the area. Specifically:

- The proposed works are reversible in nature and as such will not preclude the opportunity for future aviation use on the site;
- The fencing and awning will be able to be removed in the instance a future tenant wishes to utilise the site's airside access;

- The proposed distribution operations remain largely consistent with the site's former operations whereby the warehouse also served as a distribution centre. Additionally, this tenant has not utilised the site's airside access in recent years; and
- The site will continue to operate as a warehouse and distribution centre under this proposal, with the proposed alterations improving the efficiency and capacity of operations, thus allowing for better utilisation of the site.

It should be noted that in searching for a tenant to occupy the subject site, a demand has not been identified for an airport freight facility. In light of this, it is important to acknowledge the significant role that Sydney Kingsford Smith Airport (herein known as **Sydney Airport**) plays in the air freight industry. Since 80% of all air freight in NSW is carried in the cargo hold of passenger aircraft, which Bankstown Airport cannot accommodate, Sydney Airport is positioned to be the most significant air freight hub in NSW.

Sydney Airport's status as the leading air freight hub in NSW is reflected in statistical findings which confirm that 98% of NSW's air freight products were exported via Sydney Airport in 2018. Sydney Airport also represented 45% of Australia's total air freight imports and exports by both value and volume in the financial year 2017-18, making it the largest airport for air freight in Australia.

The *NSW Freights and Ports Plan 2018-2023* identifies that Bankstown Airport is only suited for domestic interstate parcel delivery. Furthermore, the Aviation Green Paper indicates that Bankstown Airport is earmarked to support GA such as small light aircraft, drones, emergency aviation and the like. Considering the proximity of Bankstown Airport to Sydney Airport, and the limitations to the size the aircraft that can be accommodated at Bankstown, there is limited ability for the airport to compete with the air freight industry at Sydney Airport.

Toll's decision to vacate the site suggests that Bankstown Airport does not generate sufficient demand to support air freight activities. The former owner Toll, who historically operated an air freight activity which involved domestic interstate parcel delivery, has suspended its airside activities in recent years. In light of this, it's important to acknowledge that the bulk of parcel delivery is increasingly being undertaken using larger aircraft than cannot be accommodated by Bankstown Airport.

For example, Qantas Freight utilises Sydney Airport, operates services for Australia Post and StarTrack by relying on a fleet of 16 dedicated freighters and an additional 10 aircraft under order. Out of these 26 aircraft, only 4 are small enough to land at Bankstown Airport. This indicates that cargo movements, including parcel delivery, are operating at a large scale. The demand for more substantial scale cargo movements that rely heavily on large aircraft corresponds with the corresponding increase in online shopping activity in recent years.

The lack of demand for air freight at Bankstown Airport is further evidenced by market share data, with major parcel delivery services opting to rely on larger airports. As noted previously, Australia Post utilises Sydney Airport for its cargo and freight activities. It has a 75% market share for direct-to-consumer deliveries. Together, Australia Post and Toll comprise 60% of the market share for business parcel deliveries in Australia. With both operators opting not to rely on Bankstown Airport and focus operations at alternative airport sites, there is a clear declining demand for air freight at Bankstown Airport. In further support of this, Toll, the company with the second biggest market share in Australia's delivery landscape, has chosen to vacate the subject site at Bankstown Airport at the end of their lease. This clearly suggests that it is no longer economically feasible for them to operate an air freight service out of the Airport.

The next largest cargo carrier in Australia is TNT who has a 10% market share for business parcel deliveries and 5% for direct-to-consumer deliveries. Pionair currently operates cargo flights for TNT in Australia, however, the airline is already based out of Bankstown Airport and there would be limited benefit in them relocating their current operations to the subject site.

The opening of Western Sydney Airport (**WSA**) will further limit the role that Bankstown Airport can play in air freight. WSA will be able to facilitate the movement of significant amounts of freight to service Western Sydney more efficiently and productively than Bankstown Airport. WSA will also operate without a curfew, unlike Sydney Airport, which further strengthens its position as an air freight hub in Greater Sydney.

Overall, it is considered that there is limited demand for the use of the site for air freight activities due to a number of factors including:

- The size of the planes that the Bankstown Airport can accommodate;
- Toll's decision to vacate the site and disuse the accessibility to airside land in recent years; and

- The competition that other existing and planned airports/airport sites in Sydney present, particularly given their capacity to support large cargos and planes.

It is concluded that the proposed works necessary to transition the site to a high-volume ground-based distribution centre for last mile delivery represents a more efficient use of land and will provide improved economic and employment outcomes for Bankstown Airport, Canterbury-Bankstown LGA and Sydney as a whole.

The proposed works are minor and reversible. In light of this and given the absence of environmental impacts, the proposal will not preclude the site from being used for airside activities in the future should the demand arises once the proponent's lease expires.

9.2.1. Zone Objectives

The Master Plan outlines objectives for the Aviation Zone which future development must be consistent with. An assessment against these objectives can be found in **Table 7**.

The assessment demonstrates that the proposal is not antithetical to the objectives nor will not compromise the ability for Bankstown Airport's ongoing operations to comply with the objectives.

Table 7 Aviation Zone Objectives

Objective	**Proposed Development**
Provide an area accommodating: aa) Safe aircraft landing, take-off and taxiing operations for fixed-wing and rotary aircraft; bb) Aircraft navigation aids, radar and communications equipment, including air traffic control; cc) Aviation rescue, emergency services and firefighting and meteorological services; dd) Aviation-related support industry; and ee) Airport terminals.	The proposed development involves only minor alterations and additions to an existing warehouse and will have no impact on the safety and operation of existing aviation activities. An assessment of the proposed development against the *National Airports Safeguarding Framework* can be found in **Appendix H** and in the Aviation Impact Assessment prepared by Aviation Projects at **Appendix C**. This assessment confirms that the proposal will not result in any adverse impacts or compromise the safety of the Airport. The Desktop Wind Assessment demonstrates that the free-standing awning, which represents the only proposed built form structure, will have no material impact on the wind environment.
Provide safe and efficient access and operation of all movement areas recognising aircraft types, numbers of aircraft movements and surrounding development infrastructure.	The proposal involves the removal of airside access to the existing apron area on the site. However, the apron is disused by the existing tenant and is independent of the airport's functions and aeroplane movement areas. As such, its removal will have no impact on the existing access and movement arrangements within the airport. The proposal will not modify the existing development's envelope. The proposed lighting arrangements have been designed in response to the proponent's operational requirements and will not give rise to unreasonable light spill. With appropriate waste arrangements in place, it will not attract wildlife which may give rise to wildlife strikes or conflicts between aviation operations and wildlife populations.

Objective	Proposed Development
	The Desktop Wind Assessment confirms the introduction of the proposed awning will not alter wind impacts. In light of the above, the proposal will have no impact on safe and efficient aircraft movements elsewhere in the airport.
Provide a safe and enhanced environment, provided through: ff) Protection of aircraft operations	The proposal will not obstruct the operation and movement of aircraft. The proposed development does not intrude into the OLS or PANS-OPS surfaces, nor is it within the Building Restricted Area of any communication, navigation or surveillance infrastructure.
gg) Controlled access and secure operational areas and movement	The proposed fence along the site boundary will ensure the security of the movement areas of the airport through controlling access and preventing the proposed operation of the site from impacting on aviation activities.
hh) Management of environmentally significant areas to the north-west and south-east of the runway, including minimising bird attraction.	The proposed works relate to an existing development site and as such will not impact environmentally significant areas within the airport. Further, appropriate waste management measures will be implemented to minimise the attraction of wildlife, including birds.

9.3. Development Guidelines and Environment Strategy

The master plan is accompanied by the *Bankstown Airport Development Guidelines* and an *Airport Environment Strategy*. The proposed development is assessed against the development guidelines in **Appendix B** and against the environment strategy in **Section 10**.

10. Assessment of Key Issues

The following section assesses the potential impacts of the proposed development on Bankstown Airport and the surrounding environment.

It has been prepared for the purpose of addressing the proposal's consistency with the *Bankstown Airport Environment Strategy* contained in Section 12 of the *Bankstown Airport Master Plan 2019*.

10.1. Traffic and Parking

A Transport Impact Assessment has been prepared by Stantec and is included at **Appendix D.** It provides a statutory assessment of the proposed parking arrangements and includes a traffic generation assessment. The results of each assessment are discussed in the sections below.

10.1.1. Statutory Parking Assessment

Stantec have assessed the proposed parking arrangements against the parking rates nominated by the Master Plan. The Master Plan nominates that parking should be provided at the following rates:

- Warehouse/Distribution Centre – 1 space per 60m^2 GFA.
- Ancillary Office – 1 space per 40m^2 of GFA

The warehouse provides 7,172m^2 of GFA whilst the office component accommodates 2,185m^2 of GFA. Based on the aforementioned rates, the proposal is required to provide a total of 175 spaces comprising 120 spaces for the warehouse and 55 spaces for the ancillary office.

The proposal provides 158 on-site parking spaces, which results in a shortfall of 17 spaces. Notwithstanding, relative to the existing parking arrangements, the proposal will increase the provision of parking. The proposed parking arrangements are considered sufficient for the intended operations and will adequately address the demand for parking.

Staff of the facility will work on fixed rosters. Typically there will be approximately 70 staff on night rosters and 30 staff during a hybrid roster (which includes staff working across the day and night)

In consideration of the above, Stantec forecast that the average parking demand will range between 70 and 100 vehicles. However, this estimate is considered to be conservative as it does not account for alternative modes of transport (i.e. car sharing/pooling arrangements). In consideration of this, the provision of 158 spaces is considered to be sufficient to support the maximum operational capacity of the proposed development.

10.1.2. Traffic Generation

10.1.2.1. Existing Intersection Performance

Stantec have performed a SIDRA analysis of the nearby Milperra Road and Nancy Ellis Leebold Drive intersection. The results confirm that the intersection currently operations at a 'B' level of service (**LOS**) during the PM peak period and a 'B' level of service during the AM peak period. The intersection experiences average delays of approximately 15 to 30 sections and a 95th percentile queue length of approximately 350m in the AM peak period and 175m in the PM peak.

10.1.2.2. Post Development Phase Operational Performance

Intersection Analysis

Stantec have assessed the proposal's impact to surrounding intersections. The assessment relies on SIDRA results and considers the following intersections:

- Milperra Road Right Turn
- Nancy Ellis Leebold Drive
- Milperra Road Eastbound Through

The results are summarised in the table below. The results consider whether the queue lengths associated with the proposal can be accommodate within the available queue length associated with each of the three intersections.

Table 8 Queue Length Comparison Between Existing and Post Development

Key Movement	Available Queuing Length	Baseline + Proposed Development Average Queue	Baseline + Proposed Development 95% Queue
Milperra Road Right Turn	65m	▪ AM: 42m ▪ PM: 45m	▪ AM: 69m ▪ PM: 73m
Nancy Ellis Leebold Drive	130m	▪ AM: 71m ▪ PM 46m	▪ AM: 117m ▪ PM: 74m
Milperra Road Eastbound Through	425m	▪ AM: 252m ▪ PM: 116m	▪ AM: 411m ▪ PM: 189m

The results detailed in the table above confirm that the queue lengths associated with the post development phase along Nancy Ellis Leebold Drive and Milperra Road Eastbound Through will be wholly contained within the available queue lengths. The results confirm that the short right turn lane along Milperra Road will slightly exceed the available queue lengths during the AM and PM Peak period. However, the overflow is anticipated to be no more than one vehicle length and will occur only occasionally.

Overall, the assessment concludes that the overall impact of the proposed development on the surrounding network and intersection between Milperra Road and Nancy Ellis Leebold Drive will be minor.

Based on the assessment results detailed in the table above, Stantec anticipate that the intersection of Milperra Road and Nancy Ellis Leebold Drive will operate at a ‘C’ level of service during the AM peak period and a ‘B’ level of service during the PM peak period. In turn, the intersection will operate at a satisfactory level of service during both peak periods.

Cumulative Intersection Analysis

Stantec have prepared a cumulative traffic generation assessment which considers the future development of the site at 10 Nancy Ellis Leebold Drive. It is noted that the site is not subject to a development proposal. Notwithstanding, a cumulative traffic generation assessment has been undertaken for completeness.

When accounting for the redevelopment of 10 Nancy Ellis Leebold Drive and the subject site, the SIDRA results confirm that the intersection of Milperra Road and Nany Ellis Leebold Drive will operate at a ‘C’ level of service during the AM peak period and a ‘B’ level of service during the PM peak period.

The queue lengths associated with the following intersections are detailed in the table below:

- Milperra Road Right Turn
- Nancy Ellis Leebold Drive
- Milperra Road Eastbound Through

Table 9 Queue Length Comparison Between Existing and Post Development

Key Movement	Available Queuing Length	Baseline + Proposed Development + 10 NEL Average Queue	Baseline + Proposed Development + 10 NEL 95% Queue
Milperra Road Right Turn	65m	▪ AM: 48m	▪ AM: 81m

Key Movement	Available Queuing Length	Baseline + Proposed Development + 10 NEL Average Queue	Baseline + Proposed Development + 10 NEL 95% Queue
		▪ PM: 54m	▪ PM: 87m
Nancy Ellis Leebold Drive	130m	▪ AM: 87m ▪ PM 51m	▪ AM: 130m ▪ PM: 82m
Milperra Road Eastbound Through	425m	▪ AM: 257m ▪ PM: 121m	▪ AM: 430m ▪ PM: 200m

The results confirm that the queue lengths along Milperra Road right turn will exceed the available lengths during both the AM and PM peak periods. Similarly, the queue lengths along Milperra Road Eastbound Through will exceed the available length in the AM peak. The traffic generation along Nancy Ellis Leebold Drive will be within the 130m available queue length.

Proposed Vehicular Access Arrangements

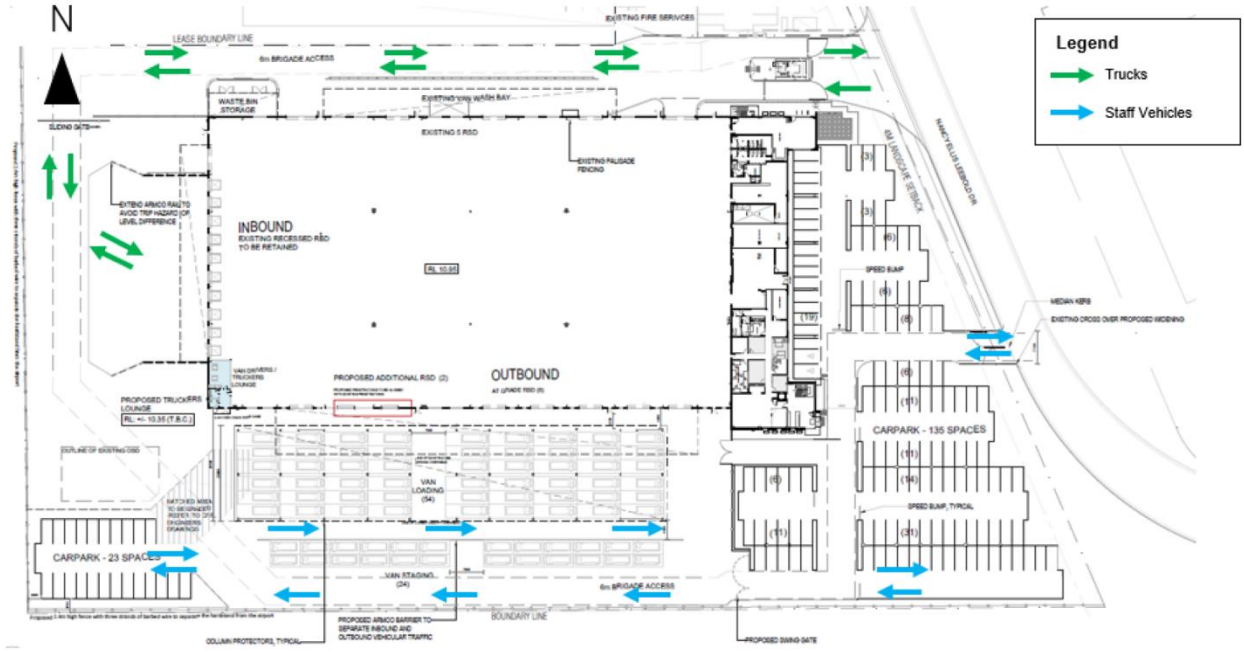
The proposal retains and expands the vehicle crossover located centrally to the site and accessible from Nancy Ellis Leebold Drive. It is considered that the proposed driveway access arrangements will facilitate the following benefits:

- Reduces the number of vehicles entering and exiting the site via the northern driveway and access road which is also shared with the adjacent tenant to the north.
- Allows for the segregation of different vehicle movements by eliminating the need to mix delivery vehicle movements with heavy vehicle movements or activities within the car park.
- Allows one-way circulation of trucks through the site via the northern driveway to prevent potential conflicts with delivery vehicles and passenger cars.
- Allows the design to facilitate safe and efficient circulation of vehicles without major amendments to the existing building or car park layout.

Further discussion is provided in *Section 3.2* of the Transport Impact Assessment at **Appendix D**.

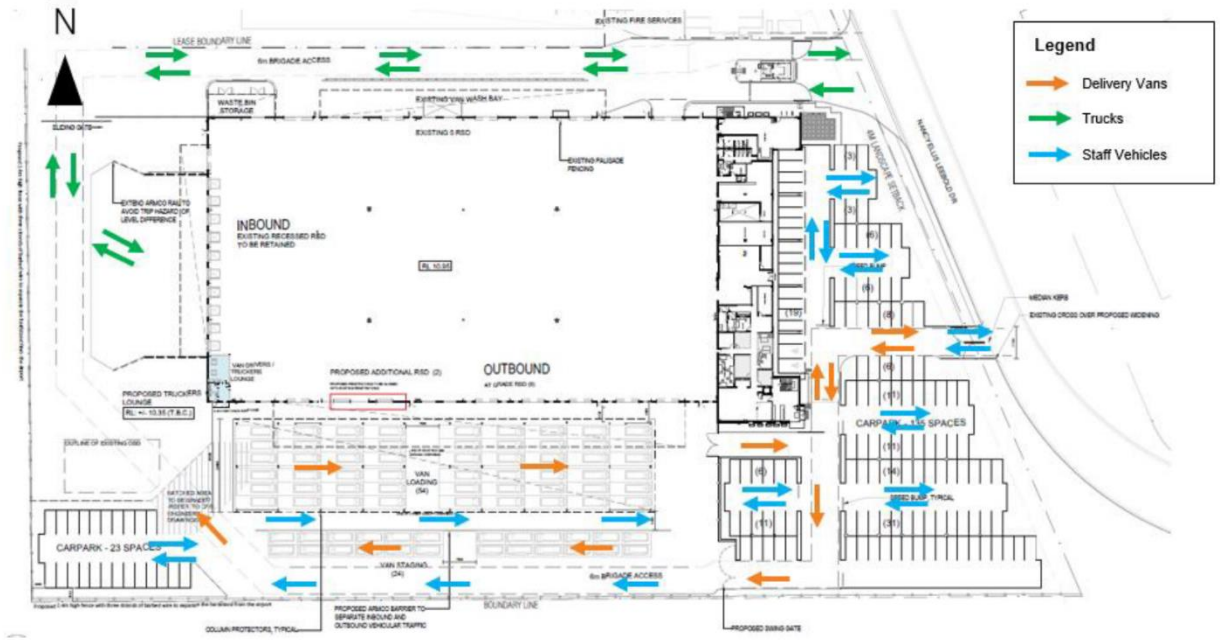
Figure 10 and **Figure 11** depict the circulation pathways during both peak and off-peak dispatch periods. As shown, during dispatch times heavy vehicles will enter and exit the site via the existing northern shared driveway. This will prevent conflicts with staff vehicles and delivery vehicles using the existing centrally located crossover during dispatch periods. Further discussion regarding the traffic management measures is provided in *Section 6.8* and the OTMP at **Appendix J**.

Figure 10 Access and Circulation Outside of Dispatch Periods



Source: TTPA/SBA Architects

Figure 11 Access and Circulation During Dispatch Periods



Source: TTPA/SBA Architects

10.2. Acoustic Impacts

An Acoustic Assessment has been prepared by Stantec and is included at **Appendix E**. The assessment consists of an Aircraft Noise Impact Assessment. In consideration of the site's interface with the airport, the report provides an assessment of the possible noise intrusion into the building.

The site falls within the 30-35 ANEF contour. In light of this, the assessment considers the acoustic criteria established by Australian Standard AS 2021:2000 Acoustics – '*Aircraft noise intrusion building siting and construction*' (**AS 2021**). The criteria provides a benchmark for assessing aircraft noise exposure for the

purpose of determining whether a development is suitable for human occupation. The AS 2021 provides the recommended internal noise levels which are used as a basis for assessing aircraft noise intrusion into the development. The recommended noise levels are as follows:

Table 10 Noise Levels associated with AS 2021:2015

Building Type	**Indoor Sound Level**
Commercial buildings, office and shops	
Private offices and conference rooms	55
Drafting and open offices	65

By virtue of the site's positioning within the ANEF 30 to 35 contour, the site is designated as being within the 'Conditionally Acceptable' category. Its designation within this category necessitates the need for an acoustic assessment. The assessment determines that the maximum acoustic noise levels will result from a BEC 300 aircraft and its arrival on the northmost runway in proximity to the site. As a worst case scenario, the aircraft will generate a maximum noise level of dB(A) 94.

In consideration of the assessment results, the facade will been designed to ensure the internal acoustic environment complies with the noise levels set out by AS 2021. To achieve this, the design is required to adopt the glazing requirements set out in *Table 3* of Stantec's report.

The requirements also mandate that new façade areas be rated to achieve a minimum acoustic performance of Rw50. This can be achieved by adopting the construction requirements set out in *Section 3.3.2* of Stantec's report. These construction requirements include the provision of:

- 2 layers of fibre cement on the external side frame;
- 64mm of steel stud framing;
- a single layer of 13mm thick fire rated plasterboard on the internal side frame;
- 50mm of thick fiberglass or mineral wall installation within the wall vanity; and
- Wall and framing should be sealed to the existing concrete faced with dense flexible mastic.

The design changes will be considered at the detailed construction phase. It is envisaged that the offices adjacent to the airport runway will be moth-balled, thereby removing the need to update the existing façade.

10.3. Aviation

An Aviation Impact Assessment has been prepared by Aviation Projects and is included at **Appendix C**. It provides an assessment of the proposal against the requirements of the Master Plan and the *National Airports Safeguarding Framework* (Guidelines A – I). The relevant provisions are addressed in the sections below.

Bankstown Airport Master Plan

The assessment evaluates the proposal's compliance with the OLS, PANS-OPS and IFR Circling height limitations. The proposal has a height of 21.15m AHD (82.5 ft AMSL) (inclusive of a 2m exhaust fan). The assessment confirms that the proposal will not encroach on the PANS-OPS surfaces or the IFR circling areas.

Aviation Projects have assessed the proposal against the OLS surfaces for Bankstown Airport. The proposed awning sits below the height of the OSL height constraint. Specifically, the awning is subject to a height constraint at the lower side of 21.6m AHD whilst the higher side is 24.5m AHD. The proposed awning reaches 16.44m AHD at the lower side and 17.29m AHD at the higher side. It therefore sits within the maximum height thresholds associated with the OSL.

Guideline A – Measures for Managing Impacts for Aircraft Noise

The guideline requires a consideration of the impacts from aircraft noise. The assessment must address the *Australian Noise Exposure Forecast System* (**ANEF System**) and the *Australian Standard AS 2021-2015 Acoustics – Aircraft Noise Intrusion – Building Siting and Construction (*AS2021).

The assessment criteria associated with the above policies and guidelines identifies that light industrial facilities are classified as conditionally acceptable when located within the 30 to 40 ANEF zone. The project site is located within the 35 ANEF contour and is therefore meets the requirements.

Guideline B – Managing the Risk of Building Generated Windshear and Turbulence at Airports

The guideline provides a framework for assessing and minimising windshear that emanates from building structures. It specifies the following requirement:

For buildings within the assessment trigger area, the first step is to consider the height of the building to determine its acceptability. The rule adopted in Australia is based on one developed in the Netherlands.

This proposes that buildings should not penetrate a 1:35 surface extending perpendicular from the runway centreline (or extended runway centreline within the assessment trigger area). As the 1:35 surface extends from the runway centreline, when considering buildings against the 1:35 surface the building height should be measured above runway level.

The approved warehouse contained within the site already penetrates the 1:35 surface plane. It therefore triggers the requirement for additional assessment to determine if the building generates unacceptable windshear and turbulence. A Desktop Wind Assessment is included at **Appendix I** and addressed in **Section 10.4**.

Guideline G – Protecting Aviation Facilities – CNS

The assessment confirms that the site is located approximately 780m from the Non-Directional Beacon and is outside the building restricted areas. It therefore will not interfere with the Non-Directional Beacon facility. In addition, the proposal will not impact on surrounding aviation radar facilities which are all located a significant distance from the site.

10.4. Wind Impact Assessment

A Desktop Wind Assessment has been prepared by Synergetics and is included at **Appendix I**. It has been prepared to address the requirements of the *National Airports Safeguarding Framework, Guideline B* which require a detailed wind assessment in the instance a development penetrates the 1:35 surface plane.

The assessment concludes that the site's existing development already penetrates the 1:35 degree plane. Notwithstanding this, the development was approved under consent DA.2006.11 and remains operational. The proposal provides only minor alterations to this existing development. The only new proposed external structure relates to the provision of a free-standing canopy within the southern boundary setback. The canopy is 94m long, 20.8m wide and reaches a maximum height of 6.4m.

The Desktop Wind Assessment confirms that the awning has the potential to generate windshear and turbulence, however, it will have no material impact on the operation of nearby aircraft. Specifically, the awning lies within the wake of the existing building and in consequence will have no material impact on the wind shear and turbulence experienced by aircraft using the adjacent runways. In consequence, the wind conditions associated with the adjacent airport will remain unaffected by the proposal.

10.5. Stormwater Management

A Stormwater Report and Civil Engineering Plans have been prepared by Stantec and are included at **Appendix G**. The plans detail the existing and proposed stormwater management system, noting that only minor upgrades are proposed for the purpose of delivering the works. The Civil Engineering Plans also include an Erosion and Sediment Control Plan which details the measures to be adopted during the construction phase to control runoff and sediment movements.

Stormwater System

As the proposal relates to alterations and additions, the site's existing stormwater system will remain largely unchanged. The stormwater system consists of a pit and pipe system and an OSD system. The site's OSD tank is located underground in the south western aspect of the site. Minor upgrades are proposed to this existing stormwater system. The works include the installation of a grated drain and the provision of additional pits for the purpose augmenting the site's stormwater infrastructure with the proposal.

Construction Measures

A range of sediment and erosion control measures are proposed to be implemented during the construction phase to prevent runoff and control the movement of sediment. These measures are illustrated on drawing *CI-070-001* at **Appendix G** and include the provision of a silt fence; installation of a vehicle shakedown device; provision of sandbags around existing inlet pits; and installation of a silt fence.

10.6. Heritage

The Master Plan incorporates the *Bankstown Airport Environmental Strategy* which requires that future developments give consideration to the heritage values contained within the Bankstown Aerodrome.

10.6.1. Indigenous Heritage

The Master Plan identifies that the potential for Aboriginal sites and artefacts to be located within the Airport is low due to significant modification to the land since 1940. The Master Plan confirms that at present there are no references to Aboriginal sites at the Airport under the OEH Aboriginal Heritage Information System (**AHIMS**).

The site has already been subject to extensive redevelopment and contains a warehouse and at-grade car park which occupy the full extent of the site. As the proposed development relates solely to minor alterations and additions and will not involve any excavation, it can be reasonably expected that the works will have no impact on indigenous heritage values.

10.6.2. Non-Indigenous Heritage

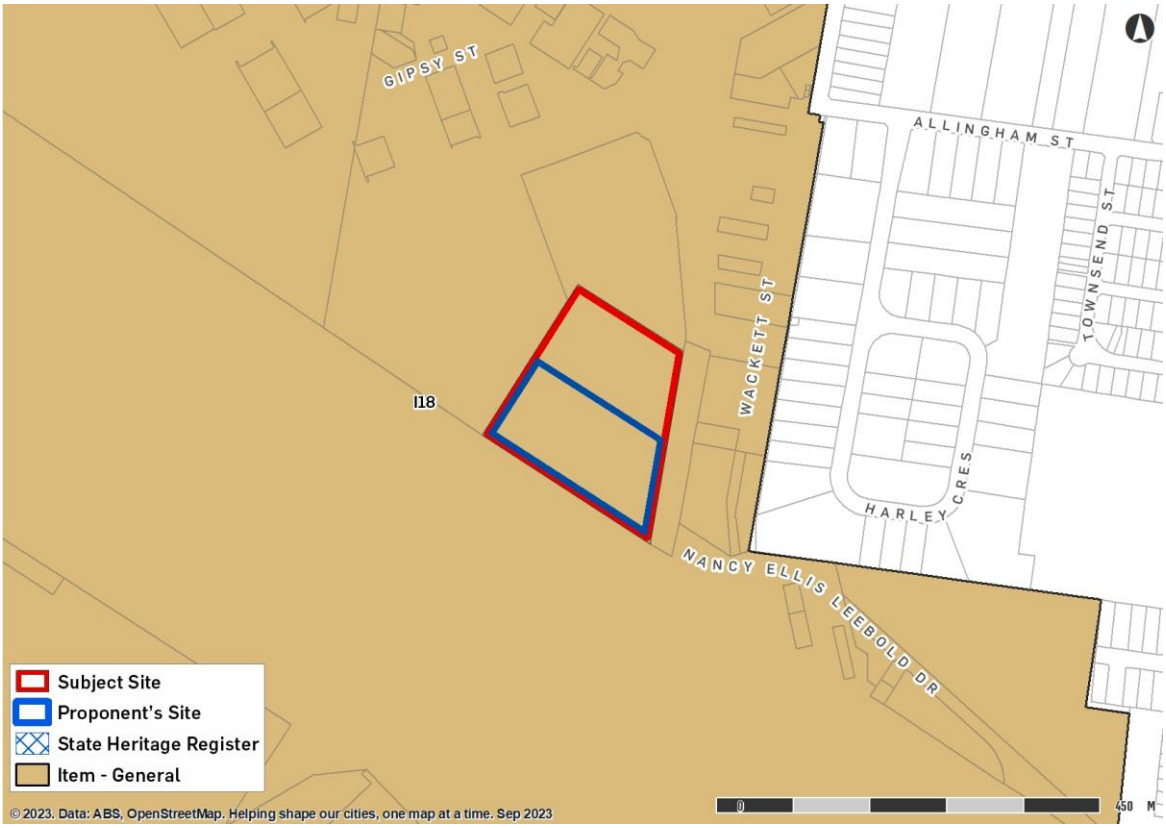
The entirety of Bankstown Airport, including the subject site, is identified as a local heritage item under the CB LEP, as shown in **Figure 12**. The item's heritage significance is primarily attributed to the airport's former operation as a Royal Australian Air Force Station from the 1940s to 1960s. Whilst the site is technically mapped as being a heritage item, its buildings were constructed in the mid-to-late 2000s and are not known to be of heritage significance.

With respect to heritage significant structures within the bounds of the airport, the Master Plan identifies that there are only two of heritage significance. These structures include the Airport Control Tower, which is a Commonwealth listed heritage item, and the 'Chevron Area', which is an area north of the runways including hangars and hardstand areas (refer to **Figure 13**).

The subject site is a significant distance from both heritage areas and does not propose to increase the bulk and scale of the development, with the works confined to the existing envelope. In consequence the proposal will not impact on site lines towards items of heritage significance.

The proposed development will not result in any visual impacts to the areas or changes to their heritage setting or character.

Figure 12 CB LEP 2023 Heritage Map



Source: CB LEP 2012 / Urbis

Figure 13 Areas of Heritage and Biodiversity Significance in Bankstown Airport

Source: Bankstown Airport Limited (BAL)

10.7. Biodiversity

The *Bankstown Airport Environmental Strategy* requires that future developments minimise the impacts to important biodiversity values contained within the Bankstown Aerodrome. The subject site has previously been developed and has operated with industrial uses for 17 years. The majority of the site is comprised of hardstand area apart from some trees and limited landscaping along the eastern boundary to Nancy Ellis Leebold Drive.

The site is also not proximate to any areas of biodiversity significance nor is it located within or close to an environmentally significant areas as defined by *Figure 12.3* of the Master Plan (refer to **Figure 11**). As such, the proposed minor alterations and additions are unlikely to have any significant impact on biodiversity.

10.8. Air Quality

The *Bankstown Airport Environment Strategy* requires that future developments give consideration to sources of emissions which may impact air quality. In addition, the strategy considers the National Environment Protection (Ambient Air Quality Measure) (**Air NEPM**) which aims to protect human health from poor airport.

The Airports Act prescribes air quality requirements which apply to emissions generated from ground-based airport activities. Such activities include fuel storage, stack emissions and engine running. The proposed alterations and additions are minor in nature and will facilitate the operation of a distribution centre used for distributing packages. It will not support activities such as those described above, and which give rise to air pollution. As such, it is considered that the proposal will not introduce new sources of emissions with the potential to lower air quality.

The Air NEPM requires that future development protect human health from air pollution. The proposal has historically operated as a warehouse used for distribution purposes. Therefore, notwithstanding its proximity to the airport, the site has been deemed suitable for occupation from an approvals perspective.

10.9. Soil and Water

The *Bankstown Airport Environment Strategy* outlines objectives and strategies to maintain soil and water quality, and manage contamination. As the proposed development does not involve excavation or disruption of soil on the site, the findings of the original contamination assessment associated with the construction of the warehouse under DA.2006.11 remain applicable.

Due to the above, no further investigation into contamination on the site is required. Furthermore, as outlined in Section 10.5, the construction process will be appropriately managed to prevent run-off of any materials into the soil or stormwater system.

As shown in the Civil Plans at **Appendix G**, appropriate erosion and sediment control measures will be implemented to control runoff and sediment. The proposed development also does not result in an increase in impermeable areas on the site and therefore will not result in increased run-off.

10.10. Hazardous Substances

The *Bankstown Airport Environment Strategy* requires that applications for building activities and works give consideration to the use of hazardous substances. Hazardous substances, which are typically associated with day-to-day aviation and manufacturing activities, can have negative impacts on human health and the environment if not appropriately managed.

The proposed development will not introduce hazardous substances and therefore does not necessitate any further assessment of impacts. Any hazardous substances or polluting material discovered during the construction process will be stored, handled and disposed of in accordance with appropriate legislative requirements.

10.11. BCA and Access

The compliance of the proposed development with the Building Code of Australia (**BCA)** will be assessed under the separate building activity permit approval undertaken by the ABC.

10.12. Sustainability

The *Bankstown Airport Environment Strategy* identifies an intention to increase the sustainability of activities within the Airport in terms of energy consumption, water use and waste generation. The sustainability of the proposed development will be assessed in a Section J, Part J4 assessment which will be prepared prior to the construction phase as part of the ABC Permit Application.

11. Conclusion

The proposed alterations and additions to the existing warehouse at 125 Nancy Ellis Leebold Drive have been assessed in accordance with the requirements of the *Airports Act 1996* and the *Airports (Building Control) Regulations 1996*. For all the reasons outlined in this report, the site is suitable for the proposed development:

- The proposal satisfies the applicable planning controls and policies, including the relevant Commonwealth legislation, the *National Airport Safeguarding Framework*, the *Bankstown Airport Master Plan 2019*, and the *Bankstown Airport Development Guidelines*;
- The proposal is permissible on the subject site based on merit as it will not disrupt the safety, security and reliability of existing aviation operations or preclude the opportunity to enhance aviation infrastructure in the Aerodrome;
- Subject to appropriate mitigation measures, the proposal will not result in any adverse environmental impacts;
- The proposed changes are reversible in nature and will have no lasting impacts on airport infrastructure or the ability of the site to facilitate airside access in the future;
- The proposal will result in positive economic and social impacts by providing operational jobs and increased private sector investment which will bolster Bankstown Airport's status as a key commercial centre in Canterbury-Bankstown;
- The supporting traffic generation analysis confirms that the proposal will not give rise to unacceptable traffic generation and nearby intersections such as Milperra Road and Nancy Ellis Leebold Drive will continue to operate at a high level of service during the PM and AM peak periods, with queue lengths remaining within acceptable lengths; and
- The proposal recognises the lack of demand for air freight facilities at Bankstown Airport considering the overall state and operation of the air freight industry, the size limitations of the Airport, and the competition presented by existing and future airports in Sydney. It responds to this by transitioning an under-utilised air-based distribution centre into a ground-based distribution centre which reflects a much more efficient and productive use of the site.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

12. Disclaimer

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A Site Survey

Appendix B Bankstown Airport Development Guidelines

Appendix C Aviation Impact Assessment

Appendix D Transport Impact Assessment

Appendix E Acoustic Assessment

Appendix F Architectural Plans

Appendix G Civil and Stormwater Report

Appendix H National Airports Safeguarding Framework Guidelines

Appendix I Desktop Wind Assessment

Appendix J Operational Traffic Management Plan

Appendix K Cost Summary