

# Honeman Close Warehouse Facility (SSD-79500208)

Application Number: 02783

Commencement Date:  
18/02/2025

Status: Locked

## 1. About the project

### 1.1 Project details

#### 1.1.1 Project title \*

Honeman Close Warehouse Facility (SSD-79500208)

#### 1.1.2 Project industry type \*

Commercial Development

#### 1.1.3 Project industry sub-type

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#### 1.1.4 Estimated start date \*

01/02/2026

#### 1.1.4 Estimated end date \*

01/02/2028

## 1.2 Proposed Action details

### 1.2.1 Provide an overview of the proposed action, including all proposed activities. \*

The Honeman Close Industrial Facility is proposed on Lot 1 in DP 1098102, located at Honeman Close, Huntingwood. This 21-hectare greenfield site is zoned IN1 General Industrial and is strategically positioned north of the M4 Motorway, west of Reservoir Road, and south of Great Western Highway. The site also includes portions of Great Western Highway (Lot 16 & 19 in DP1024111 and Lot 19 in DP819317), which will facilitate intersection upgrade works and formal access, with zoning classified as both SP2 Classified Road and IN1 General Industrial.

The development is subject to several site constraints, which have been carefully considered in the masterplan and assessment reports for the Project. These constraints include:

- State and Local Heritage classifications associated with Honeman Close.
- Threatened Ecological Communities (TECs) and habitat for threatened species.
- First and Second Order watercourses.
- Transport for NSW (TfNSW) Crash Lab design considerations for site access.
- Sydney Water portable water service infrastructure.
- Presence of Aboriginal heritage artefacts.
- Potential site contamination, including friable and non-friable asbestos and septic tank contamination.

**The purpose of the proposed action** is for the construction, operation, use and fit-out approval of two warehouses spanning 52,935 sqm GLA, complemented by ancillary office spaces and critical infrastructure, all designed to support 24/7 warehouse and distribution operations. The project encompasses extensive infrastructure, and lead-in works across the estate, including:

- Estate wide infrastructure and preparation works including vegetation clearing, bulk earthworks and remediation, watercourse realignment, retaining walls, internal services reticulation;
- Lead in services including stormwater, sewer, potable water, electrical and communications
- New Left in, Left out intersection at Great Western Highway / new proposed estate road including services relocation and eventual dedication;

Warehouse with ancillary office development including:

- Construction, operation, fit-out and use of two warehouses, totalling 52,935 sqm GLA of warehouse, including ancillary office spaces, access and hardstand, guardhouses, loading bays, landscaping, car parking, electric vehicle charging, solar panels and signage;
- Warehouse proposed height limit of 15m
- 24/7 operation
- Warehouse and distribution use with generic racking layout

A Concept Masterplan has been prepared by the Applicant which is attached as page 1 of **Attachment 1. Masterplan and Intersection layout.pdf** and the proposed Left in, Left out intersection is attached as page 1 of **Attachment 1. Masterplan and Intersection layout.pdf**

### **Project objectives and benefits**

The Project aims to deliver a modern, efficient, and sustainable facility whilst ensuring compliance with planning, environmental, and stakeholder requirements.

The key objectives of the Project include:

- Support the growing demand for industrial, logistics, and distribution infrastructure in the region.
- Develop a modern industrial and logistics hub that meets the needs of warehousing and distribution businesses.
- Enhance infrastructure and site accessibility by delivering a new signalised intersection and upgrading essential services.
- Support economic growth and job creation by generating employment opportunities during construction and long-term operations.

- Ensure environmental sustainability by integrating renewable energy solutions, water management strategies, and biodiversity protections.
- Respect cultural and heritage values by incorporating measures to protect Aboriginal heritage artefacts and mitigate impacts on heritage-listed Honeman Close.

The Project will deliver benefits such as:

- Job creation and economic investment in the local industrial sector, strengthening Huntingwood's role as a key logistics hub.
- Improved transport and connectivity, reducing congestion and enhancing road safety through upgraded infrastructure.
- Sustainable and energy efficient development, including solar panels, EV charging stations, and green infrastructure.
- Increased industrial capacity, providing high quality warehouse and distribution space to support business growth.
- Proactive community and stakeholder engagement, ensuring clear communication and responsiveness to concerns throughout the Project.

### Project activities

- Intersection upgrade works and formal access within approximately 0.4 ha of SP2 Classified Road and IN1 General Industrial land and clearing of approximately 0.06 ha of planted native vegetation
- Within Lot DP 1098102, the construction disturbance footprint is approximately 12.45 ha, which will include the following activities to facilitate the development:
  - Clearing of approximately 8.5 ha of native vegetation
  - Earthworks (cut and fill)
  - Remediation of contaminated areas
  - Realignment of approximately 550m of a 1st order ephemeral drainage line and riparian corridor restoration
  - Relocation of existing transmission lines
- The permanent disturbance footprint is approximately 10.13 ha
- Areas protected from construction disturbance is approximately 8.39 ha
- On completion of construction the areas protected from construction disturbance will increase from 8.39 ha to approximately 10.23 ha through creek line restoration and revegetation with native communities (not including landscaping setback areas adjacent to Honeman Close and along the eastern boundary).

Refer to Figures 1, 2 and 3 in **Attachment 2. Figures 1-3.pdf**

## 1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

No

## 1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? \*

The development is being assessed as a State Significant Development (SSD) under Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act 1979) in accordance with section 2 of Schedule 6 of SEPP (Planning Systems) 2021 as it has a capital investment value (CIV) of more than \$30 million.

The principal environmental planning instrument for the proposed action is the NSW State Environmental Planning Policy (Industry and Employment) 2001, formerly the SEPP Western Sydney Employment Area (WSEA).

Relevant to the proposed action, the Industry and Employment SEPP: provides consistent zoning to facilitate development for the purposes of employment and industry; and governs land use across the Huntingwood Precinct which the project site is part of.

Additionally, the Huntingwood Precinct Development Control Plan August 2011 (As amended May 2020) prescribes development control provisions.

Section 7.9 of the NSW *Biodiversity Conservation Act 2016* (BC Act) requires all SSD applications for Development Consent to be accompanied by a biodiversity development assessment report (BDAR), unless both the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. A waiver has not been sought for the Project, and therefore a BDAR has been prepared.

An assessment of the proposal's biodiversity impacts has been undertaken in accordance with the NSW *Biodiversity Conservation Act 2016* (BC Act), through application of the NSW Biodiversity Assessment Method (BAM) and is reported in the attached BDAR (**Attachment 3. Honeman Close BDAR v1**).

Relevant to the assessment of biodiversity values the following EPBC Act policies and guidelines have been used:

- Significant Impact Guidelines 1.1 - Matters of National Environmental Significance 2013 EPBC Act Policy Statement)
- Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest. A guide to identifying and protecting the nationally threatened ecological community *Environment Protection and Biodiversity Conservation Act 1999* Policy Statement 3.31 (2010)
- Conservation Advice for the River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria (approved 6 December 2020)
- Conservation advice (incorporating listing advice) for the Coastal Swamp Oak (*Casuarina glauca*) Forest of New South Wales and South East Queensland ecological community (approved 9 March 2018)

**1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. \***

The Project engagement program has been conducted in line with the NSW Department of Planning, Housing and Infrastructure's *Undertaking Engagement Guide: Guidance for State Significant Projects*.

Key stakeholders identified include the following:

- Transport for NSW
- NSW DCCEEW
- NSW Department of Planning, Housing and Infrastructure
- NSW Environment Protection Authority
- WaterNSW
- Rural Fire Service NSW
- Fire and Rescue NSW
- Endeavour Energy
- Sydney Water
- Heritage NSW

To meet the Department of Planning, Housing and Infrastructure's Social Impact Assessment (SIA) Guideline and facilitate targeted SIA engagement a project factsheet was developed and a targeted mailout conducted. The factsheet was distributed to 131 residents surrounding the proposed development, introducing the project and providing instructions on how to participate in the SIA survey.

Notably, no queries or complaints were received through the established communication channels.

See **Attachment 5. Engagement Summary Report**.

Letters and the associated factsheet were also distributed to:

- The National Native Title Tribunal (NNTT)
- NTSCORP Limited (the Native Title Service Provider for Aboriginal Traditional Owners in NSW and the ACT)
- The Office of the Registrar Aboriginal Land Rights Act 1983 (NSW) (ORALRA)
- Deerubbin Local Aboriginal Land Council (LALC)
- Greater Sydney Local Land Services (LLS)

Responses received from the above Aboriginal agencies formed part of the assessment in the project Aboriginal Cultural Heritage Assessment Report (ACHAR).

Consultation included attendance by a representative from the Deerubbin LALC at an archaeological survey conducted in accordance with the Code of Practice was conducted on 3 February 2025. A draft redacted version of the ACHAR is provided in **Attachment 6. ACHAR-draft\_redacted**, noting that this document will not be made publicly available due to cultural sensitivity reasons.

## 1.3.1 Identity: Referring party

### Privacy Notice:

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

By completing and submitting this form, you consent to the collection of all personal information contained in this form. If you are providing the personal information of other individuals in this form, please ensure you have their consent before doing so.

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☒ **Confirm that you have read and understand this Privacy Notice \***

### 1.3.1.1 Is Referring party an organisation or business? \*

Yes

## Referring party organisation details

<b>ABN/ACN</b>	12043047145
<b>Organisation name</b>	DUCHATEL, KATHRYN
<b>Organisation address</b>	2093 NSW

## Referring party details

<b>Name</b>	Kat Duchatel
<b>Job title</b>	Director
<b>Phone</b>	0437821110
<b>Email</b>	kat@ecologique.com.au
<b>Address</b>	12, Wanganella Street Balgowlah NSW 2093

## 1.3.2 Identity: Person proposing to take the action

### 1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? \*

No

### 1.3.2.2 Is Person proposing to take the action an organisation or business? \*

Yes



## Person proposing to take the action organisation details

**ABN/ACN** 088981793

**Organisation name** GOODMAN PROPERTY SERVICES (AUST) PTY LIMITED

**Organisation address** 2018 NSW

## Person proposing to take the action details

**Name** Lachlan O'Reilly

**Job title** Planning and Infrastructure Manager

**Phone** +61 481 254 556

**Email** lachlan.oreilly@goodman.com

**Address** The Hayesbery 1-11 Hayes Road Rosebery NSW 2018

**1.3.2.14 Are you proposing the action as part of a Joint Venture? \***

No

**1.3.2.15 Are you proposing the action as part of a Trust? \***

No

**1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. \***

Goodman Property Services (Aust) Pty Ltd is a real estate company that owns, develops and manages high quality industrial and business space across Australia and has various management tools and systems to reduce its impact on the environment.

Construction and Operational Environmental Management Plans have been prepared and approved by the Department of Planning and other relevant agencies for all required development consents that Goodman have developed.

These management plans set the parameters for environmental protection and maintenance and include measures for water, noise, waste, landscape, air quality and energy efficiency maintenance.

Goodman maintains reputable record of environmental management.

**1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework**

Goodman's Australian operations have systems and processes in place to manage key environmental risks across its operations. Key risks include aspects such as management of hazardous materials, protection of stormwater, management of fuel tanks, and protection of flora and fauna, particularly areas of environmental significance or conservation zones.

Goodman's sustainability strategy supports is embedded in all operations to strengthen business and enhance our social value, while reducing our environmental impact.

## 1.3.3 Identity: Proposed designated proponent

### 1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? \*

Yes

#### Proposed designated proponent organisation details

<b>ABN/ACN</b>	088981793
<b>Organisation name</b>	GOODMAN PROPERTY SERVICES (AUST) PTY LIMITED
<b>Organisation address</b>	2018 NSW

#### Proposed designated proponent details

<b>Name</b>	Lachlan O'Reilly
<b>Job title</b>	Planning and Infrastructure Manager
<b>Phone</b>	+61 481 254 556
<b>Email</b>	lachlan.oreilly@goodman.com
<b>Address</b>	The Hayesbery 1-11 Hayes Road Rosebery NSW 2018

## 1.3.4 Identity: Summary of allocation

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### ✔ Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

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ABN/ACN	12043047145
Organisation name	DUCHATEL, KATHRYN
Organisation address	2093 NSW
Representative's name	Kat Duchatel
Representative's job title	Director
Phone	0437821110
Email	kat@ecologique.com.au
Address	12, Wanganella Street Balgowlah NSW 2093

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### ✔ Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

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ABN/ACN	088981793
Organisation name	GOODMAN PROPERTY SERVICES (AUST) PTY LIMITED
Organisation address	2018 NSW
Representative's name	Lachlan O'Reilly
Representative's job title	Planning and Infrastructure Manager
Phone	+61 481 254 556
Email	lachlan.oreilly@goodman.com
Address	The Hayesbery 1-11 Hayes Road Rosebery NSW 2018

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### ✔ Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

## 1.4 Payment details: Payment exemption and fee waiver

### 1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)? \*

No

### 1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? \*

No

### 1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?

No

### 1.4.7 Has the department issued you with a credit note? \*

No

### 1.4.9 Would you like to add a purchase order number to your invoice? \*

No

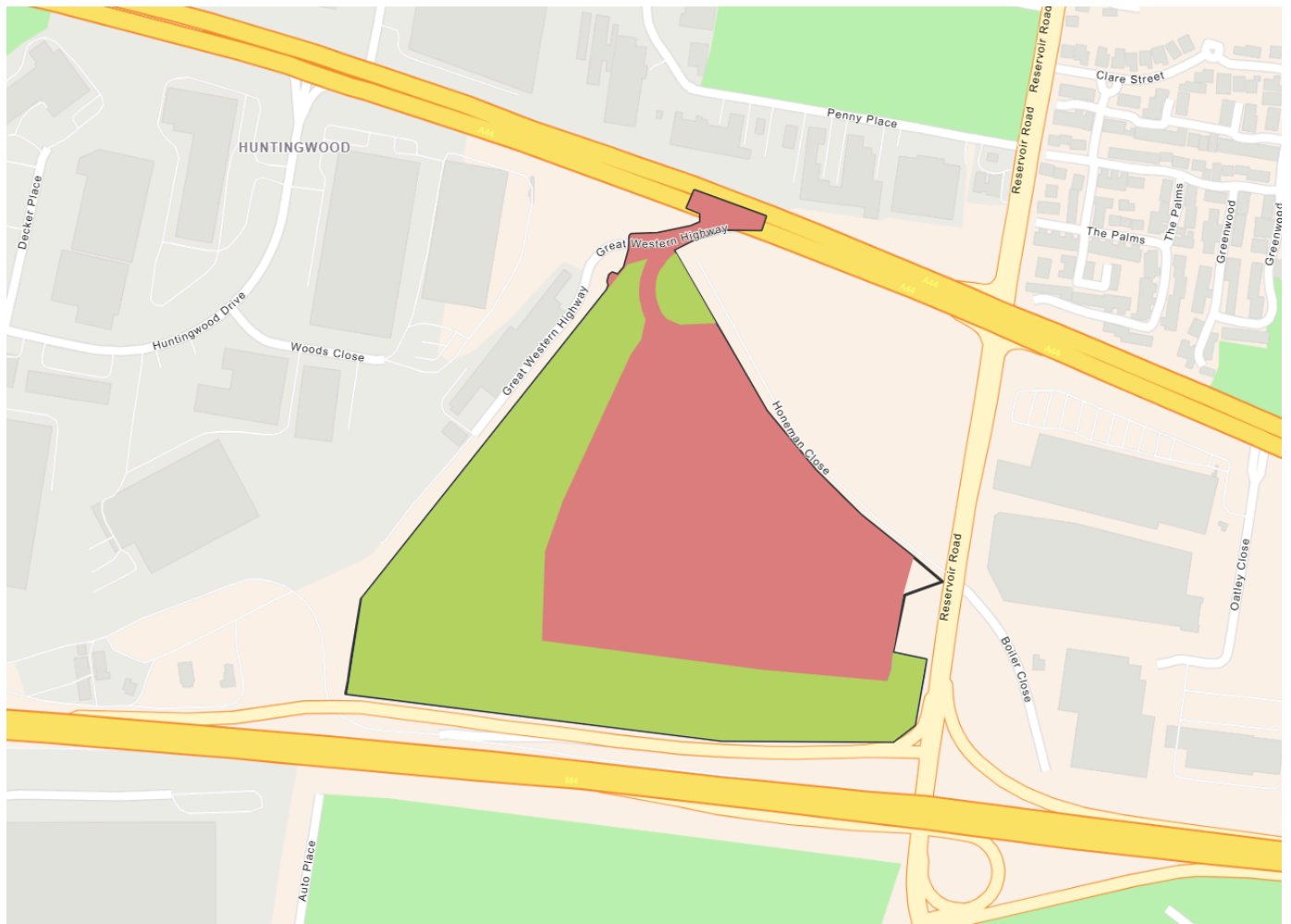
## 1.4 Payment details: Payment allocation

### 1.4.11 Who would you like to allocate as the entity responsible for payment? \*

Proposed designated proponent

## 2. Location

## 2.1 Project footprint



**Project Area:** 21.45 Ha **Disturbance Footprint:** 12.95 Ha **Avoidance Area:** 8.39 Ha **Retention Area:** 10.23 Ha

## 2.2 Footprint details

### 2.2.1 What is the address of the proposed action? \*

1 Honeman Close, Huntingwood NSW 2148

### 2.2.2 Where is the primary jurisdiction of the proposed action? \*

New South Wales

### 2.2.3 Is there a secondary jurisdiction for this proposed action? \*

No

### 2.2.5 What is the tenure of the action area relevant to the project area? \*

Privately owned

## 3. Existing environment



## 3.1 Physical description

### 3.1.1 Describe the current condition of the project area's environment.

The project site comprises a vacant, densely vegetated lot with approximately 30% cleared and/or weed infested. The site has been historically cleared and thinned, with limited areas of older growth canopy trees. Most of the site's vegetation is relatively young with aerial photography as recent as 1985 showing only about 30% of the site covered by canopy vegetation.

Presently an estimated 25% of the site (5.15 ha) is made up of exotic grassland and weeds. The remainder of the site contains remnant and regrowth native vegetation with some semi cleared vehicle/access trails (most of which are overgrown by woody weeds).

Native vegetation is represented by three Cumberland Plain plant community types (PCTs). All three PCTs are threatened ecological communities (TECs) under the BC Act and EPBC Act.

A low to low-moderate condition has been allocated to each PCT due to extensive shrub and ground layer weed infestations. Large areas of the subject site are densely weed infested by woody weeds to the extent that light levels on the forest/woodland floor are limited and, excluding leaf litter, a groundcover is completely absent (refer to page 7, Section 2 of **Attachment 3. Honeman Close BDAR v1**).

Where woody weed infestations are absent typically coincides with monocultures of *Casuarina glauca* (swamp oak), under which a thick blanket of branch and leaf litter has prevented shrub and ground layers (refer to Page 8, Section 2 of **Attachment 3. Honeman Close BDAR v1**).

It should be noted that the allocation of low to low-moderate condition allocated to each PCT aligns with the Huntingwood DCP's description of the Precinct's remnant vegetation, which is identified as: fragmented; edge effected; and ranging in condition from medium to poor.

Based on review of historical site use information and inspection of site conditions, JBS&G (2025) identified potential areas of environmental concern (AECs) and associated contaminants of potential concern (COPCs), which were associated with the importation of fill materials from unknown origins, fly tipping activities. Also potential impacts in surface water and groundwater from adjacent and upgradient commercial/industrial landuses, including the TfNSW Crashlab (west of the site), construction staging associated with the M4 (east of site), and the M4 Service Station (southwest of site) (refer page 9 of **Attachment 4. Detailed Site Investigation**).

A remediation action plan (RAP) and preliminary long term environmental management plan have been prepared by JBS&G for the proposed development.

### 3.1.2 Describe any existing or proposed uses for the project area.

The project site has been largely vacant for the past 40 years. Previously part of the cleared northern section of the site was leased by Blacktown City Council and parts of the eastern and southeastern areas of the site were used as a staging yard for the M4 construction.

The proposed use under SSD-79500208 seeks approval for the construction and operation of an industrial warehouse and distribution centre.

### 3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

The project site contains:

- Three threatened ecological communities (TECs) protected under the BC Act and EPBC Act, and
- Foraging habitat for threatened species
- Two first order watercourses that form a second order 'headwater' of Bungaribee Creek

See Figure 2 in **Attachment 2. Figures 1-3.**

The project site does not contain any other natural features and/or other important or unique values.

### 3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

Elevation within the project site ranges from approximately 76 m Australian Height Datum (AHD) in the eastern portion of the site to approximately 58 m AHD in the northern portion of the site. Local topography generally slopes gently downwards to the north and northwest.

## 3.2 Flora and fauna

**3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.**

Flora and fauna investigations have been undertaken in accordance with the NSW Biodiversity Assessment Method (BAM) and are reported in the project BDAR (see Section 2. Methods in **Attachment 3. Honeman Close BDAR v1**).

It should be noted that the project BDAR has been prepared to support the SSDA's Test of Adequacy and will be subject to amendments as required and suggested by DPHI and relevant DCCEE departmental groups.

Current investigations are ongoing due to threatened species with specific survey requirements and accessibility issues and the BDAR will also be amended as additional data and analysis becomes available.

Examples of EPBC Act listed entities include:

- *Pimelea spicata* (spiked rice flower) requires a minimum of three surveys at least four weeks following a rainfall event of at least 30mm.
  - Insufficient rainfall events have occurred since surveys commenced.
  - The project site potentially provides habitat for this species, albeit highly degraded. However, surveys conducted within and adjacent to the project site from 2007 to current have not detected this species.
  - This species has been assumed present in the BAM calculator and species offset credit obligations apply (unless the species' absence can be compliantly demonstrated prior to the project being conditioned).

The subject site contains an area located on the NSW important habitat map (IHM) for *Lathamus discolor* (Swift Parrot). The Swift Parrot is listed as critically endangered under the EPBC Act and endangered in NSW under the BC Act.

IHMs identify areas that are considered essential to support critical life stages of the species, e.g. breeding areas or locations important for foraging/over-wintering for migratory species.

Under the BAM, no further survey is required if the subject land is on an IHM for a species unless the species profile in the TBDC states otherwise (which is not the case for the Swift Parrot). The species is considered present and the part of the project site that is within the IHM forms the species polygon used to generate species credits in the BAM calculator. Any remaining habitat on the subject land, e.g. foraging habitat, unmapped locations used by these species has been assessed for ecosystem credits.

The following NSW threatened species have been considered:

- *Burhinus grallarius* Bush Stone-curlew
- *Hieraaetus morphnoides* Little Eagle
- *Meridolum corneovirens* Cumberland Plain Land Snail
- *Petaurus norfolkensis* Squirrel Glider
- *Pultenea pedunculata* Matted Bush-pea

The Cumberland Plain Land Snail has a high likelihood of being present on the wider project site, however it has not been found within the construction footprint during targeted surveys to date.

The remaining species are not expected to be found on the project site but have been assumed present in the BAM calculator. However, surveys are continuing to compliantly determine each species absence or presence within the project site.

Refer to Sections 5.2 and 5.3 of **Attachment 3. Honeman Close BDAR v1**.

### 3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

The project site is located in the Cumberland Plain IBRA subregion and contains three plant community types (PCTs) that are aligned with the following EPBC Act listed ecological communities:

- PCT 4025: River-flat Eucalypt Forest on Coastal Floodplains of southern New South Wales and eastern Victoria – listed as Critically Endangered
- PCT 4023: Coastal Swamp Oak (*Casuarina glauca*) Forest of New South Wales and South East Queensland – listed as Endangered
- PCT 3320: Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest – listed as Critically Endangered

Based on data collected from the subject site to date, only PCT 4025 definitely meets the diagnostic and condition threshold conditions to be considered the EPBC Act listed community.

PCT 4023 does not satisfy the condition thresholds due to a lack of perennial understorey cover and the presence of what is considered to be 'transformer species'.

Due to dense and impenetrable weed infestations surveying all areas of PCT 3320 is resource intensive (requiring manual and mechanical slashing of lantana, blackberry and African olive to proceed).

Vegetation integrity plot and transect data has been collected compliantly with the BAM but the data collected is insufficient to determine whether PCT 3320 satisfies key diagnostic characteristics and condition thresholds to be considered the EPBC listed community.

Despite the potential for PCT 3320 to *not* satisfy key diagnostic characteristics and condition thresholds (see **Attachment 7. Figure 4**), for the purpose of this referral, PCT 3320 has been assumed to meet these thresholds and be considered the EPBC Act listed community.

The condition of all PCTs within the project site is low to low-moderate due to widespread and dense, often impenetrable, woody weed infestations (refer to Section 4.2 of **Attachment 3. Honeman Close BDAR v1**).

## 3.3 Heritage

### 3.3.1 Describe any Commonwealth Heritage Places Overseas or other places recognised as having heritage values that apply to the project area.

The project site does not contain any Commonwealth heritage places and is not listed on any statutory or non-statutory heritage registers. The State Heritage listed Former Great Western Road (#01911 i.e., Honeman Close) and Prospect Reservoir and Surrounding Areas (#01370) heritage items are located within 250m of the project site.

The proposed works would have little to no adverse physical heritage impact and minor adverse impacts to Honeman Close as part of the Former Great Western Road alignment, and little to no impact to Prospect Reservoir and Surrounding Areas.

See pages 16-18 of **Attachment 8. Statement of Heritage Impact**.

### 3.3.2 Describe any Indigenous heritage values that apply to the project area.

The project site is considered to be of moderate scientific significance due to the presence of a tree with toe holds, and the location of The Great Western Highway to the northeast, a known Aboriginal pathway.

The toe hold tree demonstrates a distinct process that is at risk of loss and is considered to be of moderate rarity. The tree has the potential to address questions regarding the timing and nature of past land use.

No specific socio/cultural values have been identified within the study area.

Refer to Section 6 of **Attachment 6. ACHAR-draft\_redacted**.

**Attachment 6. ACHAR-draft\_redacted** will not be made publicly available due to cultural sensitivity reasons.

## 3.4 Hydrology

### 3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. \*

Two mapped first order watercourses that converge to form a short second order stream reach of Bungaribee Creek occur in the northwest of the project site. These watercourses are primarily fed by runoff from the M4 Motorway, Reservoir Road and the TfNSW Crashlab facility. Historical imagery shows that the drainage flow paths of both mapped watercourses have, over time, extended further to the southern boundary of the project site. Historical imagery can be found in **Attachment 9. Historical Aerial photography** and Appendix A of **Attachment 3. Honeman Close BDAR v1**.

The eastern drainage line is proposed to be realigned. This drainage line is ephemeral with periodic flows after rainfall from M4 Motorway runoff. No threatened entities are associated with the drainage line itself although PCT 4023 has become established along the drainage line.

Hydrological investigations undertaken for the project are detailed in Section 7 of **Attachment 13. Engineering Report**.

Review of historical site use information and inspection of site conditions by JBS&G (**Attachment 4. Detailed site investigation**) identified potential impacts in surface water and groundwater from adjacent and upgradient commercial / industrial landuses, including the TfNSW Crashlab (west of the site), construction staging associated with the M4 (east of site), and the M4 Service Station (southwest of site).

Assessment of surface and groundwater conditions by JBS&G (**Attachment 4. Detailed site investigation**) did not identify the occurrence of unacceptable risks relating to groundwater or surface water, either within the subject land or associated with migration either onto, or away, from the subject land.

## 4. Impacts and mitigation

## 4.1 Impact details

**Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.**

EPBC Act section	Controlling provision	Impacted	Reviewed
S12	World Heritage	No	Yes
S15B	National Heritage	No	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	Yes	Yes
S20	Migratory Species	No	Yes
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	No	Yes
S26	Commonwealth Land	No	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	No	Yes



### 4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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#### 4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \*

No

#### 4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

\*

There are no world heritage areas within or proximal to the project site and the proposal will directly or indirectly impact on a world heritage area. No world heritage areas are identified in the attached Protected Matters search report (**Attachment 10 Protected Matters - MNES**).

### 4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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#### 4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \*

No

#### 4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

\*

There are no national heritage areas within or proximal to the project site and the proposal will directly or indirectly impact on a national heritage area. No world heritage areas are identified in the attached Protected Matters search report (**Attachment 10 Protected Matters - MNES**).

### 4.1.3 Ramsar Wetland

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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**4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

**4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

There are no Ramsar Wetlands within or proximal to the project site and the proposal will directly or indirectly impact on a national heritage area. No Ramsar Wetlands are identified in the attached Protected Matters search report (**Attachment 10 Protected Matters - MNES**).

**4.1.4 Threatened Species and Ecological Communities**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

### Threatened species

Direct impact	Indirect impact	Species	Common name
No	No	<i>Acacia bynoeana</i>	Bynoe's Wattle, Tiny Wattle
No	No	<i>Acacia pubescens</i>	Downy Wattle, Hairy Stemmed Wattle
No	No	<i>Allocasuarina glareicola</i>	
No	No	<i>Anthochaera phrygia</i>	Regent Honeyeater
No	No	<i>Aphelocephala leucopsis</i>	Southern Whiteface
No	No	<i>Aprasia parapulchella</i>	Pink-tailed Worm-lizard, Pink-tailed Legless Lizard
No	No	<i>Botaurus poiciloptilus</i>	Australasian Bittern
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Callocephalon fimbriatum</i>	Gang-gang Cockatoo
No	No	<i>Calyptorhynchus lathami lathami</i>	South-eastern Glossy Black-Cockatoo
No	No	<i>Chalinolobus dwyeri</i>	Large-eared Pied Bat, Large Pied Bat
No	No	<i>Climacteris picumnus victoriae</i>	Brown Treecreeper (south-eastern)
No	No	<i>Cynanchum elegans</i>	White-flowered Wax Plant
No	No	<i>Dasyurus maculatus maculatus</i> (SE mainland population)	Spot-tailed Quoll, Spotted-tail Quoll, Tiger Quoll (southeastern mainland population)
No	No	<i>Erythrorhynchus radiatus</i>	Red Goshawk
No	No	<i>Falco hypoleucos</i>	Grey Falcon
No	No	<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
No	No	<i>Genoplesium baueri</i>	Yellow Gnat-orchid, Bauer's Midge Orchid, Brittle Midge Orchid
No	No	<i>Grantiella picta</i>	Painted Honeyeater

Direct impact	Indirect impact	Species	Common name
No	No	Heleioporus australiacus australiacus	Giant Burrowing Frog, Eastern Owl Frog
No	No	Hirundapus caudacutus	White-throated Needletail
Yes	No	Lathamus discolor	Swift Parrot
No	No	Litoria aurea	Green and Golden Bell Frog
No	No	Macquaria australasica	Macquarie Perch
No	No	Melaleuca deanei	Deane's Melaleuca
No	No	Melanodryas cucullata cucullata	South-eastern Hooded Robin, Hooded Robin (south-eastern)
No	No	Neophema chrysostoma	Blue-winged Parrot
No	No	Notamacropus parma	Parma Wallaby
No	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Persicaria elatior	Knotweed, Tall Knotweed
No	No	Persoonia nutans	Nodding Geebung
No	No	Petauroides volans	Greater Glider (southern and central)
No	No	Petaurus australis australis	Yellow-bellied Glider (south-eastern)
No	No	Petrogale penicillata	Brush-tailed Rock-wallaby
No	No	Phascolarctos cinereus (combined populations of Qld, NSW and the ACT)	Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory)
No	No	Pimelea curviflora var. curviflora	
Yes	No	Pimelea spicata	Spiked Rice-flower
No	No	Pomaderris brunnea	Rufous Pomaderris, Brown Pomaderris
No	No	Prototroctes maraena	Australian Grayling
No	No	Pseudomys novaehollandiae	New Holland Mouse, Pookila
No	No	Pteropus poliocephalus	Grey-headed Flying-fox
No	No	Pterostylis gibbosa	Illawarra Greenhood, Rufa Greenhood, Pouched Greenhood
No	No	Pterostylis saxicola	Sydney Plains Greenhood

Direct impact	Indirect impact	Species	Common name
No	No	Pultenaea parviflora	
No	No	Pycnoptilus floccosus	Pilotbird
No	No	Rhizanthella slateri	Eastern Underground Orchid
No	No	Rhodamnia rubescens	Scrub Turpentine, Brown Malletwood
No	No	Rostratula australis	Australian Painted Snipe
No	No	Stagonopleura guttata	Diamond Firetail
No	No	Syzygium paniculatum	Magenta Lilly Pilly, Magenta Cherry, Daguba, Scrub Cherry, Creek Lilly Pilly, Brush Cherry
No	No	Thesium australe	Austral Toadflax, Toadflax
No	No	Tringa nebularia	Common Greenshank, Greenshank

### Ecological communities

Direct impact	Indirect impact	Ecological community
No	No	Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion
No	No	Coastal Swamp Oak (Casuarina glauca) Forest of New South Wales and South East Queensland ecological community
No	No	Cooks River/Castlereagh Ironbark Forest of the Sydney Basin Bioregion
Yes	Yes	Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest
Yes	Yes	River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria
No	No	Western Sydney Dry Rainforest and Moist Woodland on Shale

**4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

Yes

**4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. \***

## River-Flat Eucalypt Forest and Cumberland Plain Woodland communities

Approximately 0.72 ha of moderate condition River-Flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and Southeast Corner Bioregions will be cleared to facilitate the development.

Approximately 2 ha of low-moderate condition and 0.51 of low condition PCT 4023 will be cleared to facilitate the development. PCT 4023 aligns with but is unlikely to meet the condition thresholds of the EPBC Act listed Swamp Oak Floodplain Forest of the NSW, Sydney Basin and South East Corner Bioregions will be cleared to facilitate the development.

Approximately 3 ha of low-moderate condition and 0.72 ha of low condition PCT 3320 Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest will be cleared to facilitate the development. The low condition PCT 3320 does not meet the condition thresholds to be considered the EPBC Act listed community and it is uncertain whether the low-moderate condition PCT 3320 meets the condition thresholds. For the purpose of this referral, the low-moderate condition PCT 3320 is assumed to be the EPBC Act listed community.

Indirect impacts are not expected to have a significant impact on these communities as the construction footprint has allowed for a disturbance buffer which will be securely fenced during construction and operation. All retained vegetation is located within a dedicated ecological zone in the project site.

### Threatened species

Direct and indirect impacts on threatened and/or migratory species are not anticipated due to:

- absence of specific habitat requirements, or
- species not detected during site surveys, and / or
- project site considered too degraded for species to have subsisted if they were ever present.

Refer to **Attachment 14. Protected matters habitat summary table.**

Notwithstanding the above reasoning, the following threatened species have been assumed present in the project area for the purpose of the SSD-79500208 application:

### **Lathamus discolor (Swift Parrot)**

NSW Important Habitat Mapping (IHM) for the Swift Parrot is located across the northwestern corner of the project area. The extent of IHM in the project area includes exotic vegetation, planted native trees, hardstand and small areas of low quality PCT 4023 (monoculture of *Casuarina glauca*) and moderate quality PCT 4025 (River-flat Eucalypt Forest).

Under the NSW Biodiversity Assessment Method (BAM), survey is not required for the species if the project area contains IHM. The species is assumed present and the extent of IHM is used as a species polygon to calculate species credit offset obligations. Remaining potential foraging habitat within the project area that is not located on the IHM is offset through ecosystem credit offset obligations.

Approximately 0.33 ha of IHM will be cleared, although an area of 0.4 ha has been conservatively entered into the BAM calculator (BAM C) which includes the following:

- 0.20 ha low quality PCT 4023
- 0.12 ha moderate quality PCT 4025
- 0.01 ha planted native trees

Approximately 0.16 ha of PCT 4025 in and adjacent to the IHM area has been avoided.

The NSW Bionet Atlas was used to investigate records of the Swift Parrot since 1 Jan 1990 from within a 10km search radius of the project area.

The most recent and nearest record is from 2014 of four (4) individuals from the McDonalds car park on the M4 Motorway approximately 850m southwest of the development site at Eastern Creek.

Prior to this there is a single record from Prospect Reservoir from 2007. Other proximal records are from >20 yrs ago (i.e., 1991- 2001).

**Attachment 15. Determination of Swift Parrot IHM** illustrates the method in which the IHM within the subject land has been calculated.

No individuals will be directly impacted, and the area of IHM impacted by the project as a percentage of the total area or extent of the species occupancy (%) is 0.0002%. This is not considered significant.

#### **Pimelea spicata**

*Pimelea spicata* has been assumed present in the project area as under the NSW BAM, surveys for the species are yet to be conducted compliantly. 219 records of the species were returned from the Bionet search radius. 197 of these records are located in the Prospect Reservoir Nature Reserve approximately 1.2 kms to the southeast of the project area and the nearest to the project area of all records. The areas to be impacted are considered highly degraded and unlikely to support the species.

Historical imagery shows that Prospect Reservoir has retained intact cover of Cumberland Plain Woodland over the past century or more (refer to **Attachment 16. Historical imagery**) whereas the project area has been substantially thinned and degraded over time.

**Attachment 17. Significance of impacts** provides an assessment against the significant impact criteria provided in the EPBC Act Matters of National Environmental Significance Significant impact guidelines 1.1 (2013).

This assessment has concluded that the proposed action will not result in a significant impact on either the Swift Parrot or *Pimelea spicata*.

#### **4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact?**

\*

Yes

#### **4.1.4.5 Describe why you consider this to be a Significant Impact. \***

The direct clearing of River-Flat Eucalypt Forest and Cumberland Plain Woodland represents a significant impact prior to offsetting and other proposed mitigation measures associated with the project.

#### **4.1.4.7 Do you think your proposed action is a controlled action? \***

Yes

#### **4.1.4.8 Please elaborate why you think your proposed action is a controlled action. \***

The direct removal of River-Flat Eucalypt Forest and Cumberland Plain Woodland is a residual/permanent impact. Despite the poor condition of all vegetation within the project area, both communities are listed as critically endangered under the EPBC Act.

Significant impact criteria for critically endangered ecological communities listed under the EPBC Act are described on page 11 of the 'Matters of National Environmental Significance Significant impact guidelines 1.1 (2013) as follows:

An action is likely to have a significant impact on a critically endangered or endangered species if there is a real chance or possibility that it will:

- lead to a long-term decrease in the size of a population
- reduce the area of occupancy of the species
- fragment an existing population into two or more populations
- adversely affect habitat critical to the survival of a species
- disrupt the breeding cycle of a population
- modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline
- result in invasive species that are harmful to a critically endangered or endangered species becoming established in the endangered or critically endangered species' habitat
- introduce disease that may cause the species to decline, or
- interfere with the recovery of the species.

In the absence of mitigation measures the clearing of River-Flat Eucalypt Forest and Cumberland Plain Woodland will modify, destroy and remove the availability of habitat for these communities.

With respect to the Swift Parrot and *Pimelea spicata*., the proposal will remove degraded and sub-optimal habitat that is already infested with invasive species. The proposal Notwithstanding both species have been assumed present within the Project area.

**4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. \***



Knowledge of biodiversity values gained from site investigations has informed the early planning of the masterplan but ultimately the subject land is challenged by a range of constraints and not limited to those associated with biodiversity values, which have influenced the design and siting of the Project.

The key constraint is a Restriction on Use and Covenant registered on title means that the only permissible access is from the Great Western Highway in the northwestern corner of the subject land. This effectively sterilises access to parts of the subject land where biodiversity values are lower.

Further the northwestern corner of the subject land is where two first order tributaries converge to a second order reach of Bungarribee Creek; and where the subject land is identified on the NSW important habitat map (IHM) for *Lathamus discolor* (Swift Parrot).

A range of design configurations were assessed in consultation with the project's architects, traffic and civil engineers and ecologists (see **Attachment 15. Masterplan evolution**). Through this iterative process, the final access alignment avoids Bungarribee Creek and the majority of good condition IHM for the Swift Parrot; and provides for habitat connectivity in both north-to-south and southwest-to-southeast directions (see Figures 1, 2 and 3 in **Attachment 2. Figures 1-3**).

Unavoidable impacts are proposed to be offset through the retirement of ecosystem and species credits under the NSW Biodiversity Offset Scheme. See **Attachment 11. BAM CreditSummaryReports**.

- A dedicated ecology zone of approximately 10.23 ha will be rehabilitated and restored (where necessary)
- Suitable hollow bearing trees have been identified and prioritised for relocation during surveys. Relocation of hollow bearing trees to the dedicated ecology zone shall be undertaken in accordance with specialist guidance.
- A Biodiversity Management Plan will be prepared that details protocols and management measures that are to be undertaken prior to and during the construction phase
- Preclearance surveys and clearing protocols will identify vegetation to be retained to prevent inadvertent damage and ensure any resident fauna are safely relocated from harm
- Best practices erosion and sedimentation management are to be implemented in accordance with the project's Erosion and Sediment Control Plan (ESCP). With appropriate safeguards in place stop the spread of sedimentation outside of the project land, the risk of this impact is low

#### 4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. \*

Clearing of native vegetation and threatened fauna habitat (e.g. Swift Parrot IHM) will be mitigated through offset obligations under the NSW Biodiversity Offset Scheme, as follows:

- Cumberland Plain Woodland - 163 ecosystem credits
- River Flat Eucalypt Forest - 59 ecosystem credits
- Swamp Oak Floodplain Forest - 21 ecosystem credits
- Swift Parrot - 20 species credits (and foraging habitat assessed in ecosystem credits)
- Pimelea spicata / Spiked Rice-flower - a minimum of 69 species credits will apply under the current assumed presence status.

Refer to **Attachment 11. BAM CreditSummaryReports**.

#### 4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Species	Common name
No	No	<i>Actitis hypoleucos</i>	Common Sandpiper
No	No	<i>Apus pacificus</i>	Fork-tailed Swift
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Calidris melanotos</i>	Pectoral Sandpiper
No	No	<i>Cuculus optatus</i>	Oriental Cuckoo, Horsfield's Cuckoo
No	No	<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
No	No	<i>Hirundapus caudacutus</i>	White-throated Needletail
No	No	<i>Motacilla flava</i>	Yellow Wagtail
No	No	<i>Numenius madagascariensis</i>	Eastern Curlew, Far Eastern Curlew
No	No	<i>Pandion haliaetus</i>	Osprey
No	No	<i>Tringa nebularia</i>	Common Greenshank, Greenshank

#### 4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \*

No

#### 4.1.5.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

\*

The project site does not contain suitable habitat for migratory wader, wetland and marine species.

#### 4.1.6 Nuclear

**4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? \***

No

**4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The proposal does not involve any of the following actions:

- establishing or significantly modifying a nuclear installation
- transporting spent nuclear fuel or radioactive waste products
- establishing or significantly modifying a facility for storing radioactive waste products
- mining or milling uranium ore
- establishing or significantly modifying a large-scale disposal facility for radioactive waste
- decommissioning or rehabilitating any facility or area in which one of the activities above has occurred
- any other type of action set out in the EPBC Regulations.

**4.1.7 Commonwealth Marine Area**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

**4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

**4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The project site is not located in or near a Commonwealth Marine Area.

**4.1.8 Great Barrier Reef**

**4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? \***

No

**4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The project site is not located near the Great Barrier Reef and the project does not involve any actions that would indirectly impact on the Great Barrier Reef. .

**4.1.9 Water resource in relation to large coal mining development or coal seam gas**

**4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? \***

No

**4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The proposal is not related to any mining developments or coal seam gas developments.

**4.1.10 Commonwealth Land**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

#### **4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

#### **4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The attached Protected Matters search report (**Attachment 10 Protected Matters - MNES**) identifies 64 Commonwealth land matters within the search buffer zone from the project site. None are located proximal to the project site and the proposal will not directly or indirectly impact on Commonwealth Land.

#### **4.1.11 Commonwealth Heritage Places Overseas**

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

#### **4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? \***

No

#### **4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.**

\*

The project site and the proposed action is and will be located locally and will not directly or indirectly impact on any Commonwealth Heritage Places located overseas. No Commonwealth Heritage Places are identified in the protected matters search report for the project (see **Attachment 10 Protected Matters - MNES**).

#### **4.1.12 Commonwealth or Commonwealth Agency**

#### 4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? \*

No

## 4.2 Impact summary

### Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

- Threatened Species and Ecological Communities (S18)

### Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

## 4.3 Alternatives

**4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? \***

No

**4.3.8 Describe why alternatives for your proposed action were not possible. \***

The subject land is a key area of the Western Sydney Employment Area (WSEA). The WSEA was established to supply employment land close to major road transport and provide businesses in the region with land for industry and employment, including transport, logistics, warehousing and office space.

1. The subject land is zoned IN1 General Industrial under the SEPP (Industry and Employment) 2021, and the proposal is for warehouse and distribution use.
2. No alternative project location has been considered as the subject land as land acquisition is specifically for this purpose.
3. Development footprint

Knowledge of biodiversity values gained from site investigations has informed the early planning of the masterplan but ultimately the subject land is challenged by a range of constraints and not limited to those associated with biodiversity values.

A Restriction on Use and Covenant registered on title means that the only permissible access is from the Great Western Highway in the northwestern corner of the subject land. This effectively sterilises access to parts of the subject land where biodiversity values are lower.

Further the northwestern corner of the subject land is where two first order tributaries converge to a second order reach of Bungaribee Creek; and where the subject land is identified on the important habitat map (IHM) for *Lathamus discolor* (Swift Parrot).

1. A range of design configurations were assessed in consultation with the project's architects, traffic and civil engineers and ecologists (see Figure 10).
2. Through this iterative process, the final access alignment avoids Bungaribee Creek and the majority of 'true' Swift Parrot habitat (i.e., Swift Parrot IHM encompasses hardstand, exotic grassland, planted roadside vegetation and low condition PCT 4023, which does not contain foraging habitat for the species).
3. Avoidance and minimisation

Features of the project design that have avoided and minimised impacts on biodiversity values include:

- The use of retaining walls instead of embankments that require larger clearing footprints to construct
- Construction and operation of onsite detention basins are contained within the development footprint (although first desired to be located within the riparian corridor footprint)
- Design of the eastern drainage line realignment:
- Retains the natural flow path commencing from the M4 Motorway piped inlet in a south to north direction for approximately 60 m.
- Wherever possible the realignment follows existing cleared areas and / or areas partially cleared (i.e., existing access tracks) where past access and activities on site have limited regrowth and minimise clearing required.
- The realigned creek depths vary to enable narrowing of the channel and batter widths required to further minimise the construction footprint and clearing required.

Wherever possible the development footprint has been sited on the lowest condition vegetation communities.

It is recognised that PCT 3320 aligns with the critically endangered Cumberland Plain Woodland, however, it is important to note the following:

- Due to immovable site constraints, PCT 3320 will be unavoidably impacted for any economically feasible development on the subject land, and
- Within the construction footprint PCT 3320 has a considerably lower vegetation integrity score than that of PCT 4025 (River Flat Eucalypt Forest).

1. This is due to most of PCT 4025 within the construction footprint lacking diversity in the understorey, instead consisting of lantana, African olive and blackberry monocultures.



2. Table 31 in the BDAR (page 56 of **Attachment 3. Honeman Close BDAR v1**) compares the extent of clearing and avoidance under the preferred and proposed masterplan and vegetation integrity scores (VIS) of each PCT zone.
3. Table 31 shows that 2.19 ha of PCT 3320 is avoided compared to only 0.71ha; and a total 7.4 ha of native vegetation avoided compared to only 5.3 ha; in the Applicant's preferred masterplan, which demonstrates avoidance during the design phase.

**Attachment 12. Masterplan Evolution and Avoidance** illustrate the proposed masterplan's evolution and avoided areas within the project site.

## 5. Lodgement

## 5.1 Attachments

## 1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 1. Masterplan and Intersection layout.pdf Masterplan and intersection layouts provided as two separate pages/diagrams	20/03/2025	No	High
#2.	Document	Attachment 2. Figures 1-3.pdf Figure 1. Project site, Figure 2. Proposed vegetation clearing and Figure 3. Areas avoided and to retained.	09/04/2025	No	High

## 1.2.7 Public consultation regarding the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 5. Engagement Summary Report.pdf Engagement summary report that provides an overview of the community and stakeholder engagement activities undertaken.	23/03/2025	No	High
#2.	Document	Attachment 6. ACHAR-draft_redacted.pdf Findings and recommendations from Cultural investigations on the project site. This document will not be made publicly available due to cultural sensitivity reasons.	09/03/2025	Yes	Medium

## 3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 3. Honeman Close BDAR v1.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	24/03/2025	No	High
#2.	Document	Attachment 4. Detailed site investigation.pdf Detailed Site Investigation to support the SSDA, prepared by JBS&G (72 pages), Appendices not included as additional 654 pages	20/03/2025	No	High

## 3.1.3 Natural features, important or unique values that applies to the project area

Type	Name	Date	Sensitivity	Confidence
#1.	Document Attachment 2. Figures 1-3.pdf Figure 1. Project site, Figure 2. Proposed vegetation clearing and Figure 3. Areas avoided and to retained.	08/04/2025	No	High

## 3.2.1 Flora and fauna within the affected area

Type	Name	Date	Sensitivity	Confidence
#1.	Document Attachment 3. Honeman Close BDAR v1.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	24/03/2025		High

## 3.2.2 Vegetation within the project area

Type	Name	Date	Sensitivity	Confidence
#1.	Document Attachment 3. Honeman Close BDAR v1.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	24/03/2025	No	High
#2.	Document Attachment 7. Figure 4.pdf Diagram of Cumberland Plain Woodland with native understory in project site	25/03/2025	No	Medium

## 3.3.1 Commonwealth heritage places overseas or other places that apply to the project area

Type	Name	Date	Sensitivity	Confidence
#1.	Document Attachment 8. Statement of Heritage Impact.pdf Assessment report of direct or indirect impacts on the heritage significance of environmental heritage	06/03/2025	No	Medium

## 3.3.2 Indigenous heritage values that apply to the project area

Type	Name	Date	Sensitivity	Confidence
#1.	Document Attachment 6. ACHAR-draft_redacted.pdf Findings and recommendations from Cultural investigations on the project site. This document will not be made	09/03/2025	Yes	Medium

publicly available due to cultural sensitivity reasons.

#### 3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 1. Masterplan and Intersection layout.pdf Masterplan and intersection layouts provided as two separate pages/diagrams	20/03/2025	No	High
#2.	Document	Attachment 13. EngineeringReport.pdf Civil engineering report (without appendices to meet size requirements)	26/03/2025	No	High
#3.	Document	Attachment 3. Honeman Close BDAR v1.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	24/03/2025	No	High
#4.	Document	Attachment 4. Detailed site investigation.pdf Detailed Site Investigation to support the SSDA, prepared by JBS&G (72 pages), Appendices not included as additional 654 pages	20/03/2025	No	High
#5.	Document	Attachment 9. Historical Aerial photography.pdf Aerial historical photography extracted from Appendix H. of JBS&G detailed site investigation	24/05/2024	No	High

#### 4.1.1.3 (World Heritage) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 10 Protected Matters - MNES.pdf PBC Act Protected matters report generated for the project site and surrounds	26/03/2025	No	Medium

#### 4.1.4.2 (Threatened Species and Ecological Communities) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 14. Protected matters habitat summary table.pdf Summary of habitat requirements of	09/04/2025	No	High

threatened and migratory species  
returned in the protected matters search  
for the project area and surrounds.

#2.	Document	Attachment 15. Determination of Swift Parrot IHM.pdf Diagram showing the 2km radius from Swift Parrot records that determined the IHM on the project land	10/04/2025	No	High
#3.	Document	Attachment 16. Historical imagery.pdf Historical aerial imagery from 1929 to 2004 showing the project area over time.	10/04/2025	No	High
#4.	Document	Attachment 17. Significance of impacts.pdf Significance of impact assessment for the Swift Parrot and Pimelea spicata.	10/04/2025	No	Medium

#### 4.1.4.10 (Threatened Species and Ecological Communities) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 11. BAM CreditSummaryReports.pdf Credit summary reports from the NSW BAM calculator summarising offset obligations and variation rules	24/03/2025	No	High
#2.	Document	Attachment 2. Figures 1-3.pdf Figure 1. Project site, Figure 2. Proposed vegetation clearing and Figure 3. Areas avoided and to retained.	08/04/2025	No	High
#3.	Document	Attachment 3. Honeman Close BDAR v1.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	24/03/2025		High

#### 4.1.4.11 (Threatened Species and Ecological Communities) Proposed offsets relevant to avoidance or mitigation measures

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 11. BAM CreditSummaryReports.pdf Credit summary reports from the NSW BAM calculator summarising offset obligations and variation rules	24/03/2025	No	High

#### 4.3.8 Why alternatives for your proposed action were not possible

Type	Name	Date	Sensitivity	Confidence
#1.	Document Attachment 12. Masterplan Evolution and Avoidance.pdf Diagrams depicting the evolution of the proposed masterplan and Figure 3. Avoidance also attached to show areas avoided and retained.	10/04/2025	No	High
#2.	Document Attachment 3. Honeman Close BDAR v1.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	24/03/2025		High

## 5.2 Declarations



## ✔ Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

ABN/ACN	12043047145
Organisation name	DUCHATEL, KATHRYN
Organisation address	2093 NSW
Representative's name	Kat Duchatel
Representative's job title	Director
Phone	0437821110
Email	kat@ecologique.com.au
Address	12, Wanganella Street Balgowlah NSW 2093

☒ Check this box to indicate you have read the referral form. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

☒ By checking this box, I, **Kat Duchatel of DUCHATEL, KATHRYN**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

## ✔ Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	088981793
Organisation name	GOODMAN PROPERTY SERVICES (AUST) PTY LIMITED
Organisation address	2018 NSW
Representative's name	Lachlan O'Reilly

Representative's job title	Planning and Infrastructure Manager
Phone	+61 481 254 556
Email	lachlan.oreilly@goodman.com
Address	The Hayesbery 1-11 Hayes Road Rosebery NSW 2018

☒ Check this box to indicate you have read the referral form. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

☒ I, **Lachlan O'Reilly of GOODMAN PROPERTY SERVICES (AUST) PTY LIMITED**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

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### ☒ Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

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Same as Person proposing to take the action information.

☒ Check this box to indicate you have read the referral form. \*

☒ I would like to receive notifications and track the referral progress through the EPBC portal. \*

☒ I, **Lachlan O'Reilly of GOODMAN PROPERTY SERVICES (AUST) PTY LIMITED**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. \*

☐ I would like to receive notifications and track the referral progress through the EPBC portal. \*