Glenfield Industrial Precinct - Precinct 1

Application Number: **03316** Commencement Date: **03/02/2026** Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Glenfield Industrial Precinct - Precinct 1

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 *

01/02/2027

1.1.4 Estimated end date *

01/12/2028

1.2 Proposed Action details

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

J.C. & F.W. Kennett P/L (the Applicant) is seeking development consent under 'Division 4.7 - State Significant Development' of the EP&A Act for the development of an industrial estate for *Warehouse or distribution centres, food and drink premises and ancillary office premises* uses on land at 2 Cambridge Avenue, Glenfield (the subject land).

The project area is approximately 21.9 (hectares) ha, within which the development footprint is approximately 17.02 ha; and avoids 3.64 ha (see uploaded shapefiles in Section 2 of this referral).

The primary objective of the proposed State Significant Development (SSD-89673472) is to develop the first stage of a new industrial logistics estate.

The proposed SSD-89673472, known as Precinct 1 of the Glenfield Industrial Precinct, comprises site preparation works, infrastructure works, subdivision, construction and operation of warehouse industrial buildings including ancillary office space and a café, car parking, hardstand areas, landscaping and signage.

Specifically, the SSDA will seek consent for the following:

- Site preparation works, including demolition, clearing of existing vegetation, ground improvements, bulk earthworks and construction of retaining walls;
- Site infrastructure works, including stormwater management and site servicing infrastructure;
- Construction and operation of two (2) warehouse and distribution centres comprising:
- Warehouse 1 located on the eastern portion of the site indicatively comprising a total GFA of 40,000m2, including 39,000m2 of warehouse GFA and 1,000m2 of ancillary office GFA; and
- Warehouse 2 located on the western portion of the site indicatively comprising a total GFA of 40,700m2, including 39,700m2 of warehouse GFA and 1,000m2 of ancillary office GFA (plus 300m2 of café GFA).
- Vehicle driveways to future Private Access Roads and connection to Cambridge Avenue;
- Hardstand areas to facilitate loading/unloading and vehicle manoeuvering;
- On-lot parking including an indicative total of 383 car parking spaces;
- Landscaping;
- Pylon and façade signage, including signage zones; and
- Hours of operation of 24 hours, 7 days a week.

The proposed activities subject to this referral include the following:

- Clearing of 1.14 ha of the critically endangered Cumberland plain shale woodlands and shale gravel transition forest (PCT 3320), and
- Clearing of 1.14 ha habitat for the threatened *Phascolarctos cinereus* (koala)

The proposal is located predominantly on land that has been cleared for the historic and existing use as a waste services facility; and lacks biodiversity values. Through design iterations the current proposal has reduced the clearing of PCT 3320 from 3.8 ha down to 1.14 ha; avoiding approximately 2.6 ha of PCT 3320 within the subject land.

Most clearing of PCT 3320 (i.e., 94.4%) will occur for the construction of a new access road, which must be suitably aligned to existing onsite infrastructure; and taking into account the requirements of the NSW Government's planned upgrade of the Cambridge Avenue. The existing access road is currently failing and will also not be suitable in the future after the NSW Government's planned upgrade of the Cambridge Avenue.

The siting of the proposal maintains existing, and will improve, connectivity to the Georges River riparian corridor, which is located approximately 40m from the eastern boundary of the subject land. This will be achieved through the creation of the new access road (located further west) and closure of the existing

access road; demolition of hardstand and revegetation of land located outside of the development footprint and adjacent to the corridor (including an internal road that runs along the eastern boundary of the subject land).

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

Yes

1.2.3 Is the proposed action the first stage of a staged development (or a larger project)?

Yes

1.2.5 Provide information about the staged development (or relevant larger project).

The proposed State Significant Development (SSD-89673472) seeks to develop the first precinct of a broader Glenfield Industrial Estate on the wider Glenfield Waste Services land holding. However, the full extent of the industrial estate has not yet been agreed with local authorities, and is subject of a separate strategic planning process.

The wider GWS site is currently the subject of a Planning Proposal that is under assessment with Liverpool and Campbelltown Councils respectively. The Planning Proposal's primary objective is to facilitate the redevelopment of the wider GSW site to create the Glenfield Industrial Estate. The Glenfield Industrial Estate will meet local employment needs, the identified need for additional industrial-zoned land in Sydney, as well as the other growing and changing warehouses needs of Western Sydney.

It is highlighted that the main area subject of the Planning Proposal rezoning (which is located north of the East Hills Rail Line) constitutes land formerly (and in some cases currently) used for waste management and landfilling as part of the ongoing Glenfield Waste Services activities. This area has negligible biodiversity values.

Precinct 1 stands alone and is not dependent on other (future) precincts within the estate. It is also on land already zoned for industrial development, and so does not rely on the Planning Proposal. In that regard, it is not considered that the relationship between the SSD proposal and the potential future stages of the estate are such that it would form part of a staged development or a related action. Subsequent precincts, if accepted as having strategic merit with local and State authorities, will be subject of future development applications, and where appropriate, these development proposals will be subject of additional referrals to the Commonwealth for consideration of the specific extent of development justified within each sub-precinct.

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

NSW *Environmental Planning and Assessment Act 1979* (EP&A Act 1979) & *State Environmental Planning Policy (Planning Systems) 2021*

The development is being assessed as a State Significant Development (SSD-89673472) 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 $50 million. It is highlighted that both proposed warehouses independently exceed the $50 million threshold.

NSW *Campbelltown Local Environmental Plan 2015* (CLEP 2015)

The site is zoned E4 General Industrial under Section 2.1 of the Campbelltown Local Environmental Plan 2015 (CLEP 2015). Warehouse or distribution centres are permissible with consent under the E4 General Industrial land zone. The ancillary Office premises and Café use are also permissible with consent as they constitute an ancillary use to the primary proposed Warehouse or distribution centres use.

NSW *Biodiversity and Conservation Act 2016* (BC Act)

Section 7.9 of the 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 BC Act, through application of the NSW Biodiversity Assessment Method (BAM) and is reported in the attached BDAR (**Attachment 2. BDAR**).

NSW State Environmental Planning Policy (Biodiversity and Conservation) 2021

The Biodiversity and Conservation SEPP contains the land use planning and assessment framework for koala habitat. This SEPP has consolidated and repealed: SEPP (Koala Habitat Protection) 2020; and SEPP (Koala Habitat Protection) 2021.

Chapter 4 (Koala habitat protection) aims to encourage the conservation and management of areas of natural vegetation that provide habitat for koalas to support a permanent free-living population over their present range and reverse the current trend of koala population decline.

EPBC Act policies and guidelines

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)
- Referral guidance for the endangered koala. Last updated: 25 October 2024 https://www.dcceew.gov.au/environment/biodiversity/threatened/publications/referral-guidelines-endangered-koala

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 Planning Secretary's Environmental Assessment Requirements (SEARs) for the SSD-89673472 were issued on 28 August 2025, which require that during the preparation of the EIS, consultation be undertaken with relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular consultation with:

- Campbelltown City Council
- Liverpool City Council
- NSW Department of Climate Change, Energy, the Environment and Water, specifically the:
  – Conservation Programs, Heritage and Regulation Group
  – Water Group
- Heritage NSW
- Environment Protection Authority
- Transport for NSW, including:
- Sydney Trains
- Fire & Rescue NSW
- NSW Rural Fire Service
- Sydney Water
- Surrounding local landowners, businesses and stakeholders
- Local and regional community and environmental groups
- Traditional Owners
- Tharawal Local Aboriginal Land Council
- Other public transport, utilities or community service providers

The outcomes of early engagement activities are outlined in **ATTACHMENT 6. Engagement Report.**

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

ABN/ACN	22692896674
Organisation name	ECOLOGIQUE AUST. PTY LTD
Organisation address	12 Wanganella St Balgowlah NSW 2093

Referring party details

Name	Kat Duchatel
Job title	Director
Phone	0437821110
Email	kat@ecologique.com.au
Address	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	000346216
Organisation name	J.C. & F.W. KENNETT PTY LTD
Organisation address	2167 NSW

Person proposing to take the action details

Name	Jacqui Kennett
Job title	Director
Phone	0408 531 476
Email	jacqui@glenfieldwaste.com
Address	2 Cambridge Ave, Glenfield NSW 2167

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. *

There are no past or present proceedings against the proponent. The proponent has no history of breaches of environmental legislation either State or Federal.

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

The proponent corporation does not have a formal written environmental policy.

The directors are aware of the corporation's obligations under the law and take advice formally on any matters as necessary.

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

ABN/ACN	000346216
Organisation name	J.C. & F.W. KENNETT PTY LTD
Organisation address	2167 NSW

Proposed designated proponent details

Name	Jacqui Kennett
Job title	Director
Phone	0408 531 476
Email	jacqui@glenfieldwaste.com
Address	2 Cambridge Ave, Glenfield NSW 2167

1.3.4 Identity: Summary of allocation

Confirmed Referring party's identity

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

ABN/ACN	22692896674
Organisation name	ECOLOGIQUE AUST. PTY LTD
Organisation address	12 Wanganella St Balgowlah NSW 2093
Representative's name	Kat Duchatel
Representative's job title	Director
Phone	0437821110
Email	kat@ecologique.com.au
Address	12, Wanganella Street Balgowlah NSW 2093

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.

ABN/ACN	000346216
Organisation name	J.C. & F.W. KENNETT PTY LTD
Organisation address	2167 NSW
Representative's name	Jacqui Kennett
Representative's job title	Director
Phone	0408 531 476
Email	jacqui@glenfieldwaste.com
Address	2 Cambridge Ave, Glenfield NSW 2167

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

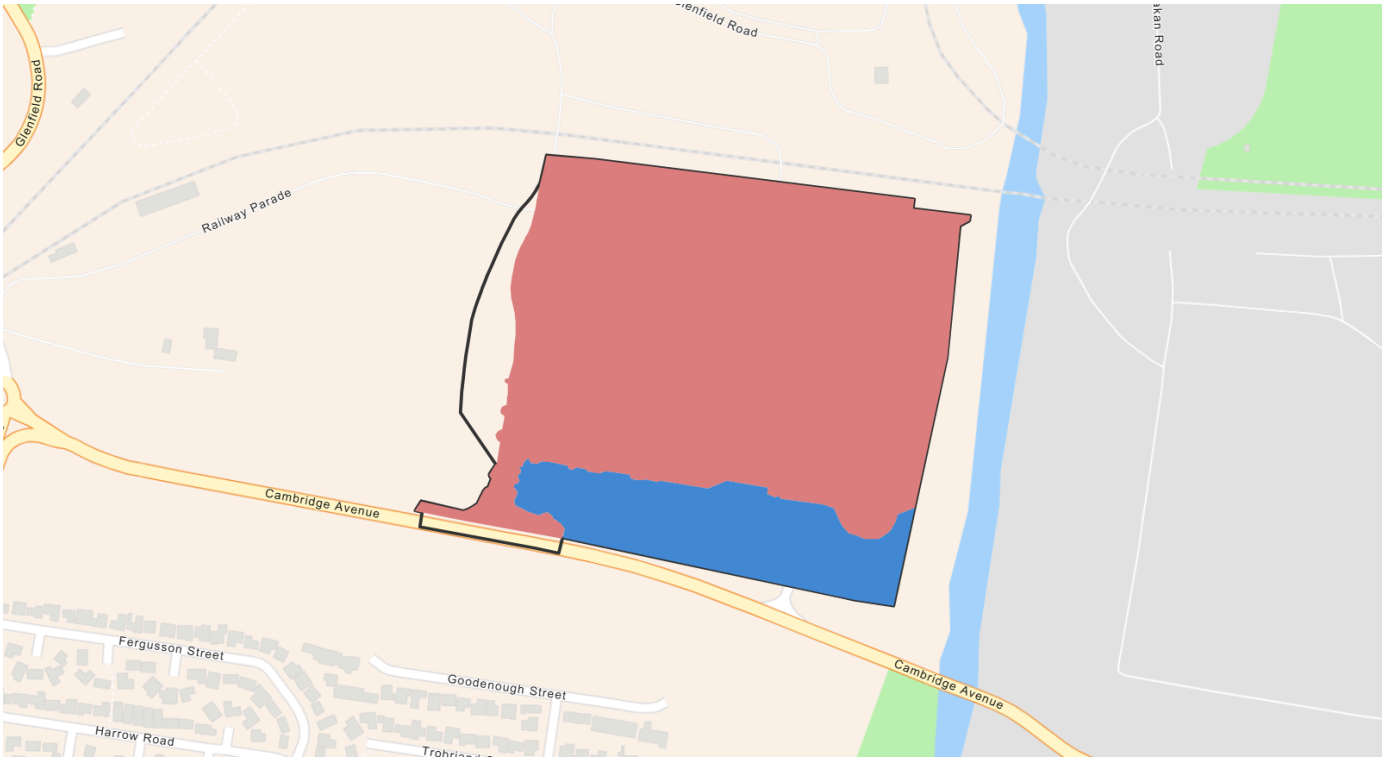
1.4 Payment details: Payment allocation

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

Person proposing to take the action

2. Location

2.1 Project footprint



Project Area: 21.95 Ha **Disturbance Footprint:** 17.02 Ha **Avoidance Area:** 3.64 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

2 Cambridge Avenue, Glenfield NSW 2167

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? *

The tenure of the action area is freehold.

3. Existing environment

3.1 Physical description

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

The project area is located at 2 Cambridge Avenue, Glenfield in close proximity to the Moorebank Intermodal Precinct; and approximately 29 km southwest of the Sydney Central Business District (CBD).

To the north, the project area is bounded by the East Hills Railway Line, which sits to the south of the boundary between the Liverpool and Campbelltown local government areas (LGAs).

To the south, the subject land is bounded by Cambridge Avenue.

- The western boundary of the subject land dissects Lots 14 and 11 from north to south. The Georges River riparian corridor runs parallel to the eastern boundary (see Figures 1 & 2 in **ATTACHMENT 1. Figures 1-3**).

The Georges River riparian corridor comprises land that has been historically subdivided and transferred from the proponent to the NSW Office of Strategic Lands.

The project area forms part of the greater Glenfield Waste Services (GWS) site and includes the Southern Landfill Zone (SLZ). The GWS site continues to the north of the project area and comprises former landfill cells referred to as the Central Landfill Zone (CLZ) and active landfill cells referred to as the Northern Landfill Zone (NLZ).

The site was historically used as a non-putrescible solid waste landfill between the late 1980s to late 1990s and is currently affected by two Environment Protection Licenses (EPLs): EPL 20974 and EPL 4614 for waste processing and storage activities.

As shown in Figure 3 in **ATTACHMENT 1. Figures 1-3**, much of the western portion of the SLZ falls within the EPL 20974 boundary. To the north of the site, north of the East Hills Railway Line, is a second EPL associated with current landfilling and extractive operations as well as additional waste processing activities (EPL 4614), with the current access route to the landfill running through the SLZ from Cambridge Avenue and an associated maintenance shed also captured in this EPL boundary.

The proposed Precinct 1 development is sited on the SLZ thereby avoiding native remnant vegetation and natural soils located between the SLZ and Cambridge Avenue.

The project area is largely unsealed land comprising access roads that extend from Cambridge Avenue in the southeast of the site around to either the eastern or western underpass on the northern site boundary that continue through to the CLZ and NLZ portions of the GWS site.

The southern portion of the project area to its boundary with Cambridge Avenue contains remnant Cumberland plain shale woodlands and shale gravel transition forest (PCT 3320), the main entrance road from Cambridge Avenue, along with smaller areas of native plantings and hardstand in the northeastern corner.

The interface between the existing SLZ and PCT 3320 contains ancillary infrastructure that services the operation of the landfill. Four buildings are present within this area, including a machinery servicing shed, an off-ground site hut of unknown purpose, a lunch/bathroom facility, and a tollbooth/weighbridge. Additional infrastructure includes a staff carpark, water tank/pumping station, and a hardstand used for overnight heavy machinery storage.

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

A waste facility is currently located on the site, receiving construction and demolition waste, which is subject to resource recovery activities. Recycling components are dispatched offsite for reuse or reprocessing, and residual waste streams are landfilled in active landfill cells located in the northern part of the broader GWS site, north of the East Hills Railway Line.

Current site operations are understood to include the receipt and processing of waste materials in the western portion of the SLZ, in accordance with EPL 20974.

A small portion of the site falls within the EPL 4614 boundary (see Figure 3 in **ATTACHMENT 1. Figures 1-3**), with the access road connecting the landfill to Cambridge Road, and a maintenance shed in the central south of the project area captured in this EPL boundary.

No landfill activities are currently occurring on the project are itself.

The southeastern corner of the project area contains a hard stand area which is leased and used for car and truck parking.

The proposed Precinct 1 will deliver industrial uses in accordance with its land zoning, supporting the release and protection of industrial zoned land and fulfilment of the current shortfall in industrial floorspace. It will also deliver industrial uses in close proximity to key freight transport corridors and trade gateways and deliver the necessary infrastructure to support the proposed development and future surrounding development. It will also support the creation of jobs through the delivery of a significant amount of employment floorspace in proximity to workers in Western Sydney.

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

The vegetated portion of the project area and the adjacent Georges River is identified on the NSW Biodiversity Values map, which identifies land with high biodiversity value, such as native vegetation, threatened species habitat and creek lines.

The vegetated portion of the project area contains the remnant Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest; a critically endangered ecological community both in NSW and Nationally.

The project area also contains habitat for a number of threatened species including:

- *Phascolarctos cinereus* (koala); Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory), endangered under the BC and EPBC Acts.
- *Meridolum corneovirens* (the Cumberland Plain land snail); endangered under the BC Act.
- *Pteropus poliocephalus* (Grey-headed flying-fox); vulnerable under the BC and EPBC Acts.

The project area provides connectivity to the adjacent Georges River riparian corridor, which ss the largest river that flows into Botany Bay. The river is a 7th Strahler stream order where it flows past the project area and its riparian corridor provides a significant wildlife corridor to the north, south, west and southwest of the project area (see Figure 1 in **ATTACHMENT 1. Figures 1-3**).

The riparian corridor contains Cumberland Bangalay x Blue Gum Riverflat Forest (PCT 3145); a Wet Sclerophyll Forest vegetation formation. PCT 3145 at this location relates to the listed as a critically endangered “River-flat eucalypt forest on coastal floodplains of the NSW North Coast, Sydney Basin and South East Corner bioregions” under the EPBC Act.

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

Not applicable.

The project area does not involve an action that is to be taken in a marine area.

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.

The project area's flora and fauna have been assessed in Sections 4 and 5 of the **Attachment 2. BDAR.** In summary the project area contains the following vegetation:

- 3.67 ha of PCT 3320 Cumberland shale plains woodland
- 0.26 ha of planted native vegetation
- 5.4 ha of exotic grassland

PCT 3320 relates to the critically endangered ecological community under both the BC and EPBC Acts. No threatened flora species have been detected within the project area.

In respect of matters required to be considered under the EP&A Act and relating to the species provisions of the BC Act, seven (7) state listed threatened fauna species have been detected during field surveys at the project area:

- *Falsistrellus tasmaniensis* (Eastern false pipistrelle)
- *Haliaeetus leucogaster* (White-bellied sea eagle)
- *Meridolum corneovirens* (Cumberland Plain land snail)
- *Miniopterus australis* (Little bent-winged bat)
- *Miniopterus orianae oceanensis* (Large bent-winged bat) to "probable" certainty)
- *Phascolarctos cinereus* (Koala)
- *Pteropus poliocephalus* (Grey-headed flying-fox)

In respect of matters required to be considered under the EPBC Act, only two (2) threatened fauna species were detected:

- *Pteropus poliocephalus* (Grey-headed Flying-fox),

Observed flying over the project area, but eucalypts in the project area would provide the species with a foraging source when in flower.

- *Phascolarctos cinereus* (Koala)

Habitat for the koala had previously been discounted in the project area by earlier studies of the wider GWS site. In late 2024 a koala strayed into the project area off Cambridge Avenue. The koala was encouraged off the road and onto a nearby tree by workers. Anecdotally, the koala remained in the tree that day and was not there the following morning.

In the past there has been a number of road kills on Cambridge Avenue. In combination with the lack of fauna passage across the Georges River, wildlife rescuers have always listed records including the 2024 koala visit as 'unsuitable habitat' or similar.

Notwithstanding, the presence of the koala in the project area warranted further survey, which was undertaken for the current SSD application using trained detection dogs.

Koala scats (including relatively fresh and older scats and two distinct sized scats) were detected in several locations within the project area and the Georges River riparian corridor (east of the project area).

Consequently, the subject site meets the definition of core koala habitat under the Biodiversity and Conservation SEPP and the Campbelltown Koala Plan of Management (CKPoM).

The koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) was listed as endangered under the EPBC Act on 12 February 2022.

A Koala Assessment Report (KAR) has been prepared for the SSD-89673472 submission and is provided in **ATTACHMENT 7. KAR**.

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

The dominant soil landscape on the project area is the Blacktown soil landscape. Smaller areas of Freemans Reach and South Creek soil landscapes are mapped as occurring in the northeastern corner along the eastern boundary of the project area (respectively).

However both Freemans Reach and South Creek soil landscapes, and large parts of the Blacktown soil landscape, have been subject to disturbance and would now be considered disturbed terrain (i.e., if available soil landscape mapping were to be updated).

The Blacktown soil landscape is anticipated to have remained in a relatively natural state where remnant Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest occurs (i.e., approximately 3.67 ha).

Approximately 0.26 ha of disturbed land contains planted native vegetation, whereas the remaining 7 ha of the project area land contains cleared land with the following surfaces:

- Hardstand (roads, buildings, ancillary hardstand);
- Cleared / exotic grass overlaying containment cells; and
- Actively used ancillary waste service areas.

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 area does not contain any listed Commonwealth Heritage places or other recognised places.

The nearest Commonwealth Heritage place is the Cubbitch Barta National Estate Area NSW (Indigenous Listed place: 105405)

A statement of heritage impact provided for the site has identified:

- There is limited potential for archaeological remains within the project area of the proposed works and that if such materials are present, these would be of limited significance.
- It is further noted that the development aims to prevent the further contamination of the landscape and any external ecological or potential archaeological materials.
- The landscape works proposed are unlikely to impact the visual or heritage values of the nearby site ‘Cubbitch Barta National Estate Area’

Refer Pages 9-10 and Figure 5 in **ATTACHMENT 3. Statement of Heritage Impact.**

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

The wider GWS site was originally home to the Tharawal (Dharawal) and Gandangarra traditional Aboriginal custodians of the land.

An archaeological survey was conducted that included the project area on 20 June 2024 by Lindsay Costigan (Senior Archaeologist, Austral) with assistance from Korri Currell of Kamilaroi Yankuntjatjara Working Group .

Excavation of 59 test pits over 5 testing areas, undertaken by Austral Archaeology, which included the project area (in Figure 6.1 of **Attachment 4. ACHAR_Redacted_Part 2**

A total of 52 Aboriginal stone artefacts were recovered from 13 of the 59 test pits. A total of 8 new Aboriginal cultural heritage sites were identified, and five subsurface artefact scatter sites. One of the newly found subsurface artefact scatter sites is located in the project area (GIP AFTS3 AHIMS #45-5-5995 along with a previously recorded surface artefact site (AHIMS #45-5-4392). another newly found subsurface artefact scatter site is located immediately adjacent to the project area (GIP AFTS2 (AHIMS #45-5-5998).

The survey aimed to re-identify the previously recorded surface artefact site (AHIMS #45-5-4392) within the gently sloping (north aspect) landform in the project area. This site was not re-identified, however as there is minimal disturbance in the area, it is considered to be of high archaeological potential. A photo plate showing the west-facing view location of AHIMS #45-5-4392 is provided in Figure 7.15 of **Attachment 4. ACHAR_Redacted_Part 2.** The location of AHIMS #45-5-4392 will not be disturbed by the proposed action.

GIP AFTS2 (AHIMS #45-5-5998) is a subsurface low-density artefact scatter situated on a flat landform adjacent to the western bank of Georges River and immediately adjacent the project area, and consists of 2 mudstone artefacts (see pages 116-117 and Figure 7.46 of **Attachment 4. ACHAR_Redacted_Part 2**).

GIP AFTS3 (AHIMS #45-5-5995) is a low-density subsurface artefact scatter and is situated on a flat landform, located approximately 247 m west of Georges River and 115 m north of Cambridge Avenue. GIP AFTS3 (AHIMS #45-5-5995) consists of 4 artefacts but further investigation is not recommended for this site. While it contained moderate average artefact densities, they contained no abnormal artefacts or formal tool types. (see pages 117-118 and Figure 8.5 of **Attachment 4. ACHAR_Redacted_Part 2**).

Figure 8.3 on page 130 of **Attachment 4. ACHAR_Redacted_Part 2** shows the revised archaeological sensitivity of the study area, including the project area.

A statement of significance has concluded the following:

- GIP AFTS2 (AHIMS #45-5-5998) has locally common types of artefacts and raw materials. There is limited research or educational potential therefore GIP AFTS2 (AHIMS #45-5-5998) is assessed as having low scientific significance due to it being a common site type in the region; and
- GIP AFTS3 (AHIMS #45-5-5995) indicates that it has social and spiritual significance only. It was determined to have low scientific significance and low aesthetic significance and has no connection to any historical event or personage and therefore has a low historical significance.

Refer to page 136 of **Attachment 4. ACHAR_Redacted_Part 2**.

Notwithstanding the proposed action has been sited to avoid impacts on GIP AFTS3 (AHIMS #45-5-5995) and GIP AFTS2 (AHIMS #45-5-5995) and these sites will be fenced off during all ground disturbing works and marked on all plans as a ‘no-go zones’.

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. *

A water and hydrology assessment has been prepared by Costin Roe Consulting (14/11/2025) that has assessed the project's impact on the surrounding environment in relation to soils and water; including stormwater and stormwater management for both construction and operational phases of the development.

Research activities included desktop review and interpretation of existing site drainage behaviour, mapping of existing overland flow catchments, and design hydrology assessment for minor and major drainage systems (1 in 20-year and 1 in 100-year ARI).

Hydrology characteristics

The project area is an existing landfill facility with limited formal drainage infrastructure. The site contains a swale on the eastern side and is described as a high point, with pre-development overland flows draining away from the centre of the site predominantly toward the Georges River and the East Hills Railway Line underpass. The railway underpass includes grated drains which convey flows to a sump and pump system northwest of the site, discharging into an existing dam to the west of the site. Existing overland flow paths have been mapped in Figure 3.1 in **ATTACHMENT 5**. Water Cycle Management

Groundwater

The proposed development is substantially clear of the levels where groundwater was measured, and it is highly unlikely that groundwater will impact the construction and operation of the industrial development. The development will incorporate controlled modulus columns (CMCs) for ground improvement procedures which will span the depth of the landfill. However, the CMCs are inert structures that will be unaffected by groundwater during construction and operational phases of the development. Additionally, subsurface investigations (desktop review and CPT) were reviewed to inform understanding of site conditions relevant to groundwater and infiltration behaviour.

Hydrological investigations / surveys

Hydrological investigations undertaken include stormwater quality modelling using MUSIC (Model for Urban Stormwater Improvement Conceptualisation). The MUSIC model (14497.06-Rev3.sqz) was developed to assess the effectiveness of the proposed stormwater treatment train and to predict compliance with Council water quality requirements. The model utilised six-minute pluviographic rainfall data sourced from the Bureau of Meteorology (Liverpool Whitlam Centre station 067035) and PET data from the MUSIC dataset. See Sections 4 & 5 in **ATTACHMENT 5**. Water Cycle Management.

Site water balance, water demand and water efficiency

A site water balance assessment for stormwater, refer Sections 3–5 in **ATTACHMENT 5**. Water Cycle Management.
Water efficiency measures incorporated into the design include a proposed rainwater harvesting system for non-potable reuse; with:

- Rainwater reuse proposed for toilet flushing and irrigation
- An aim of reducing water demand by approximately 50–70% (subject to detailed design).

Rainwater tanks have been sized using MUSIC software to balance supply and demand, with predicted demand reduction of approximately 59% using minimum tank sizes of 160–170 kL.

Stormwater drainage design and onsite detention

Stormwater drainage has been designed using a minor system for the 1 in 20-year ARI event and a major system for the 1 in 100-year ARI event, with defined overland flow paths to convey flows to detention systems prior to discharge.

Detailed hydraulic assessment of the internal drainage system will be undertaken during detailed design, including DRAINS modelling.

Proposed Surface Water Drainage System

The design of the stormwater system for this site will be based on relevant national design guidelines, Australian Standard Codes of Practice, the standards of Campbelltown City Council and accepted engineering practice. Runoff from buildings will generally be designed in accordance with AS 3500.3 National Plumbing and Drainage Code Part 3 – Stormwater Drainage. Overall site runoff and stormwater management will generally be designed in accordance with the Institution of Engineers, Australia publication “Australian Rainfall and Runoff” (2019Edition), Volumes 1 and 2 (AR&R).

The proposed stormwater drainage system for the development will comprise a minor and major system to safely and efficiently convey collected stormwater run-off from the development to the legal point of discharge.

The minor system is to consist of a piped drainage system which has been designed to accommodate the 1 in 20-year ARI storm event (Q20). This results in the piped system being able to convey all stormwater runoff up to and including the Q20 event.

The major system will be designed to cater for storms up to and including the 1 in 100year ARI storm event (Q100). The major system will employ the use of defined overland flow paths, such as roads and open channels, to safely convey excess run-off from the site.

Refer also to Section 3 in **ATTACHMENT 5**. Water Cycle Management.

Surface water discharge quality assessment (MUSIC modelling)

A MUSIC model was developed to assess stormwater quality performance and demonstrate compliance with pollutant reduction objectives. The water quality constituents modelled in MUSIC were Total Suspended Solids (TSS), Total Phosphorus (TP) and Total Nitrogen (TN). MUSIC modelling results indicate the proposed treatment train achieves pollutant load reductions of approximately 80% for TSS, 62.4% for TP, 46% for TN, and 98.5% for gross pollutants.

Developed impervious areas including roof, hardstand, car parking, roads and other extensive impervious areas are required to be treated by the Stormwater Treatment Measures (STM’s). The STM’s shall be sized according to the whole catchment area of the development. The STM’s for the development shall be based on a treatment train approach to ensure that all the objectives above are met. Components of the treatment train for the development are as follows:

- Primary treatment to the parking, roof, and hardstand areas is to be performed via the provision of pit inserts to all grated pits. Internal roads will be treated by OceanProtect OceanSave GPTs or similar GPTs;
- Tertiary treatment is to be performed via proprietary stormwater filtration cartridges in underground tanks prior to discharge from the site;
- A portion of the roof will also be treated via rainwater reuse and settlement within the rainwater tank.

Water quantity

It is considered that the combined peak flow runoff (from the local catchment and larger Georges River catchment) in the River will not increase as a result of the development (without traditionally sized on-site detention). The inclusion of traditional OSD indicates that, although local flows would be reduced, the peak of flow from the site is drawn out over a longer period which coincides with that of the larger and delayed peak flow within the Georges River. This results in an overall increase in peak flows, i.e., an adverse effect results. Hence, the impact without OSD would be less than the impact with OSD.

Based on the assessment it is concluded that additional mitigation measures are not required to mitigate impact associated with water quantity during operational phase of the Proposal.

Refer also to Section 5 in **ATTACHMENT 5. Water Cycle Management.**

Mitigation, management and monitoring (construction and operational phases)

Measures for construction-phase soil and water management, include implementation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) consistent with Managing Urban Stormwater – Soils and Construction (Landcom, 2004).

Construction controls include sediment basins, sediment fences, diversion drains, and stabilised site access.

For operational stormwater management, an indicative maintenance schedule recommends inspection after large storm events to ensure the ongoing performance of stormwater quality devices.

Refer also to Section 6 in **ATTACHMENT 5**. Water Cycle Management**.**

Conclusion

The civil engineering strategy has been developed to provide a best practice solution within the constraints of the existing landform and proposed development layout. Within this strategy a stormwater quantity and quality management strategy has been developed to consider peak flows and reduce pollutant loads in stormwater leaving this site. The stormwater management for the development has been designed in accordance with Campbelltown City Council requirements and ensuring acceptable impacts relating to the development.

The hydrological assessment shows local post development flows from the site will be consistent with pre-development flows and demonstrates that the site discharge will not adversely affect any land, drainage system or watercourse as a result of the development.

During the construction phase, a Sediment and Erosion Control Plan will be in place to ensure the downstream drainage system and receiving waters are protected from sediment laden runoff.

During operational phase of the development, a treatment train incorporating the sue of a proprietary filtration system is proposed to mitigate any increase in stormwater pollutant load generated by the development. MUSIC modelling results indicate that the proposed STM are effective in reducing pollutant loads in stormwater discharging from the stie and meet the requirements of Council’s pollution reduction targets. Best management practices have been applied to the development to ensure that the quality of stormwater runoff is not detrimental to the receiving environment.

Based on the assessment it is concluded that additional mitigation measures are not required to mitigate impact associated with water quantity during operational phase of the Proposal.

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. *

The project area is not located proximal to any world heritage areas and the proposed activities would not result in an indirect impact on any world heritage areas.

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. *

The project area is not located proximal to any national heritage areas and the proposed activities would not result in an indirect impact on any national heritage areas.

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. *

The project area is not located proximal to any Ramsar wetlands and the proposed activities would not result in an indirect impact on any Ramsar wetlands.

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	Acacia bynoeana	Bynoe's Wattle, Tiny Wattle
No	No	Acacia pubescens	Downy Wattle, Hairy Stemmed Wattle
No	No	Allocasuarina glareicola	
No	No	Anthochaera phrygia	Regent Honeyeater
No	No	Aphelocephala leucopsis	Southern Whiteface
No	No	Botaurus poiciloptilus	Australasian Bittern
No	No	Caladenia tessellata	Thick-lipped Spider-orchid, Daddy Long-legs
No	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Callocephalon fimbriatum	Gang-gang Cockatoo
No	No	Calyptorhynchus lathami lathami	South-eastern Glossy Black-Cockatoo
No	No	Chalinolobus dwyeri	Large-eared Pied Bat, Large Pied Bat
No	No	Charadrius leschenaultii	Greater Sand Plover, Large Sand Plover
No	No	Climacteris picumnus victoriae	Brown Treecreeper (south-eastern)
No	No	Cryptostylis hunteriana	Leafless Tongue-orchid
No	No	Cynanchum elegans	White-flowered Wax Plant
No	No	Dasyurus maculatus maculatus (SE mainland population)	Spot-tailed Quoll, Spotted-tail Quoll, Tiger Quoll (southeastern mainland population)
No	No	Erythrotriorchis radiatus	Red Goshawk
No	No	Falco hypoleucos	Grey Falcon
No	No	Gallinago hardwickii	Latham's Snipe, Japanese Snipe

Direct impact	Indirect impact	Species	Common name
No	No	Genoplesium baueri	Yellow Gnat-orchid, Bauer's Midge Orchid, Brittle Midge Orchid
No	No	Grantiella picta	Painted Honeyeater
No	No	Grevillea parviflora subsp. parviflora	Small-flower Grevillea
No	No	Heleioporus australiacus australiacus	Giant Burrowing Frog, Eastern Owl Frog
No	No	Hirundapus caudacutus	White-throated Needletail
No	No	Lathamus discolor	Swift Parrot
No	No	Leucopogon exolasius	Woronora Beard-heath
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 hirsuta	Hairy Geebung, Hairy Persoonia
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)
Yes	Yes	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	
No	No	Pimelea spicata	Spiked Rice-flower
No	No	Pomaderris brunnea	Rufous Pomaderris, Brown Pomaderris
No	No	Pseudomys novaehollandiae	New Holland Mouse, Pookila

Direct impact	Indirect impact	Species	Common name
No	Yes	Pteropus poliocephalus	Grey-headed Flying-fox
No	No	Pterostylis saxicola	Sydney Plains Greenhood
No	No	Pycnoptilus floccosus	Pilotbird
No	No	Rhizanthella slateri	Eastern Underground Orchid
No	No	Rhodamnia rubescens	Scrub Turpentine, Brown Malletwood
No	No	Rhodomyrtus psidioides	Native Guava
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	Coastal Swamp Sclerophyll Forest of New South Wales and South East Queensland
No	No	Cooks River/Castlereagh Ironbark Forest of the Sydney Basin Bioregion
Yes	Yes	Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest
No	Yes	River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria
No	No	Shale Sandstone Transition Forest of the Sydney Basin Bioregion
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. *

Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (direct and potential indirect impacts)

Through clearing, the proposal will directly impact on 1.14 ha of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (referred to as PCT 3320 in the BDAR prepared for the SSDA submission.

Potential indirect impacts may affect retained Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest. Potential indirect impacts include: construction activities (e.g., dust, erosion and sedimentation, accidental damage, noise); and operational activities (e.g., accidental spills, noise and light spill) may occur in the absence of avoidance and mitigation measures.

River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria (potential indirect impacts)

Potential indirect impacts may affect River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria in the adjacent Georges River riparian corridor. Potential indirect impacts include: construction activities (e.g., dust, erosion and sedimentation, accidental damage, noise); and operational activities (e.g., accidental spills, noise and light spill) may occur in the absence of avoidance and mitigation measures.

Phascolarctos cinereus (combined populations of Qld, NSW and the ACT) (direct and potential indirect impacts)

Through clearing, the proposal will directly impact on 1.14 ha of habitat for the koala.

Potential indirect impacts that may affect include those described for the threatened ecological communities (above) and also the potential for vehicle strike, which is a prescribed impact in NSW.

Further information on prescribed impacts, direct and indirect impacts is provided in Sections 6,8,9 and 11 of **ATTACHMENT 2. BDAR**

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. *

Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (PCT 3320)

PCT 3320 or CPW is a critically endangered ecological community under both the BC and EPBC Acts. In NSW, the community is also listed as a serious and irreversible impact (SAII) entity.

The CPW geographic location also coincides with major growth centres within the region, including the South West and North West growth areas, the Wilton Growth Area, the Greater Macarthur Growth area, the Western Sydney Employment Area (WSEA) and the Western Sydney Aerotropolis. Hence it is not surprising that CPW has become critically endangered.

Management of CPW loss is now regulated under the BC Act and BC Reg. and is also a major consideration under the Cumberland Plain Conservation Plan (DPE 2022). The Cumberland Plain Conservation Plan (CPCP, DPE 2022) has been prepared for the specific purpose of arresting further development impacts on CPW and other PCTs within the Cumberland Plain. This is intended to be done through a combination of bio-certification and the reservation of additional dedicated areas in which CPW will be conserved.

Serious and irreversible impact (SAII)

An impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of a threatened species (including endangered populations) or an ecological community becoming extinct based on the following 4 principles set out in clause 6.7 of the Biodiversity Conservation Regulation 2017 (NSW):

1. The impact will cause a further decline of a species or ecological community that is currently observed, estimated, inferred or reasonably suspected to be in a rapid rate of decline.
2. The impact will further reduce the population size of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to have a very small population size.
3. The impact is made on the habitat of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to have a very limited geographic distribution.
4. The impacted species or ecological community is unlikely to respond to measures to improve its habitat and vegetation integrity and therefore its members are not replaceable.

Cumberland Plain Woodland in the Sydney Basin Bioregion (CPW) is identified to be at risk of becoming extinct based principles 1 and 2.

In NSW accredited biodiversity assessors must address the additional SAII criteria listed in the NSW Biodiversity Assessment Method (BAM) subsection 9.1.1 for threatened ecological communities, including identification of the impact threshold for each potential serious and irreversible impact. Except when there is no threshold available.

Thresholds have not been assigned to many threatened ecological communities, including Cumberland Plain Woodland. Instead, a determination is made from the information provided by the assessor in the BDAR. The assessor is not required to provide an opinion on whether or not they believe the impact to be irreversible. The relevant assessment for the project area is provided in Section 9 of **ATTACHMENT 2. BDAR.**

Without SAII thresholds and the recent active management of CPW by the NSW government, it is difficult to ascertain whether or not clearing of 1.14ha is significant.

An assessment using the EPBC Act Significant impact guidelines 1.1 (2013) is provided below:

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

- *reduce the extent of an ecological community*

1.14 ha of PCT 3320 equates to 0.01% and 0.00003% (respectively) of the minimum (11,200 ha) and maximum (29,813 ha) of the estimated geographic extent of the Cumberland Plain Woodland (CPW). See also Section 9 of **ATTACHMENT 2. BDAR.**

- *fragment or increase fragmentation of an ecological community, for example by clearing vegetation for roads or transmission lines*

The proposal will result in a gap of < 40m (from the new road construction) within the project area. The proposed new entrance road will be a permanent impact. However, areas disturbed by the construction of the road will be restored, eventually reducing the separation down to an average width of only 20m. See also Section 8.3 of **ATTACHMENT 2. BDAR.**

- *adversely affect habitat critical to the survival of an ecological community*

Other than the proposed 1.14 ha of clearing, the proposal is not anticipated to adversely affect habitat critical to the survival of the community.

No critical habitat has been declared for the community.

- *modify or destroy abiotic (non-living) factors (such as water, nutrients, or soil) necessary for an ecological community's survival, including reduction of groundwater levels, or substantial alteration of surface water drainage patterns*

The project area has been substantially altered anthropogenically. The remnant abiotic factors within the project (except for clearing) are not anticipated to be modified or destroyed.

- *cause a substantial change in the species composition of an occurrence of an ecological community, including causing a decline or loss of functionally important species, for example through regular burning or flora or fauna harvesting*

The proposal is not anticipated to cause a substantial change in the species composition or cause a decline or loss of functionally important species. No regular burning or harvesting is proposed.

- *cause a substantial reduction in the quality or integrity of an occurrence of an ecological community, including, but not limited to: – assisting invasive species, that are harmful to the listed ecological community, to become established, or – causing regular mobilisation of fertilisers, herbicides or other chemicals or pollutants into the ecological community which kill or inhibit the growth of species in the ecological community, or*

The proposal is not anticipated to result in these impacts. A vegetation management plan will be prepared for implementation that will include avoidance and mitigation of such impacts. The area that will be the subject of the vegetation management plan is shown in Figure 15 of **ATTACHMENT 2. BDAR.**

- *interfere with the recovery of an ecological community.*

The proposal is not considered to interfere with the recovery of the ecological community. The proposal's management of CPW and koala habitat within the project area aligns with recovery objectives for the community.

Phascolarctos cinereus (combined populations of Qld, NSW and the ACT)

An assessment using the EPBC Act Significant impact guidelines 1.1 (2013) is provided below, which indicates that the proposal is unlikely to result in a significant impact:

An action is likely to have a significant impact on an 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*

NO, the project area does not contain a breeding population of the species.

- *reduce the area of occupancy of the species*

NO, the project area has only recently been considered as providing core habitat for the species

- *fragment an existing population into two or more populations*

NO, there are potentially only two koalas, definitely one koala, that has visited the project area

- *adversely affect habitat critical to the survival of a species*

NO, as discussed in Section 2.5 of **Attachment 7. KAR** (Koala Assessment Report) the habitat within the project area is considered suboptimal and is not considered to be habitat critical to the survival of the species.

- *disrupt the breeding cycle of a population*

NO, the project area does not contain a breeding population of the species, nor will the proposal impact on an area that contains a breeding population.

- *modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline*

NO, as discussed in Section 2.5 of **Attachment 7. KAR** (Koala Assessment Report) the habitat within the project area is considered suboptimal and the removal of 1.14 ha is unlikely to isolate or decrease the availability or quality of habitat for the species; such 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*

NO, the proposal is considered unlikely to result in invasive species becoming established area. The change in land use from waste disposal to warehouse and distribution is considered more likely to decrease this risk.

- *introduce disease that may cause the species to decline*

NO, as above the changed land use is considered more likely to decrease this risk.

- *interfere with the recovery of the species.*

NO, on the basis of the suboptimal habitat within the project area, the proposal is considered unlikely to interfere with the recovery of the species.

Should the proposal proceed in the absence of avoidance and mitigation measures, the proposed activity is considered as follows:

- Direct impacts on Cumberland Plain Woodland, with reference to the precautionary principle, is considered to be a significant impact
- Direct impacts on habitat for the Koala is not considered a significant impact
- Indirect impacts on all protected matters is also not considered a significant impact

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. *

Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (PCT 3320)

PCT 3320 meets the minimum condition thresholds specified in the EPBC Act Policy Statement 3.31 ("Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest - A guide to identifying and protecting the nationally threatened ecological community") that a patch of the ecological community must meet for national law protection.

National protection means any new (or intensified activities) that may have a significant impact on one or more patches of the listed ecological community should be referred to the federal environment minister for assessment and approval. Activities likely to require approval under the EPBC Act (if significant) include, clearing native vegetation.

Hence, the direct impacts from clearing of 1.14 ha of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (PCT 3320), in combination with the clearing of 1.14 ha of habitat for the koala is anticipated to be determined a controlled action by the federal environment minister.

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. *

Mitigation of indirect impacts during construction will be specified within a project Construction and Environmental Management Plan (CEMP), which at a minimum shall include the following:

- Erosion and sediment controls
- Dust suppression
- Pre-clearance and clearance processes to achieve the following, but not limited to, objectives: protection of retained native vegetation and habitat; installation of construction fencing and demarcation of no-go zones; prevention of injury/mortality to all fauna; prevention of the spread and/or introduction of weeds and pathogens

Mitigation of operational indirect impacts will be integrated into the detailed design of the proposal, which includes, but is not limited to:

- Stormwater management and protection of downstream aquatic ecosystems
- Light spill into the adjacent bushland and native fauna habitat
- Relocation of suitable hollow bearing trees (which have been identified and prioritised for relocation)
- Preparation and implementation of a vegetation management plan which will guide weed control, rehabilitation and restoration works within the ecological zones of the subject land
- Installation of a fauna fencing
- Installation of a fauna bridge over the new access road

The proposed weed control, rehabilitation and restoration of Cumberland Plain vegetation communities, and fauna habitat relocation will substantially improve on the condition, function and structure value of remnant vegetation being retained on the subject land.

Provision has also been made to plant preferred koala feed trees as a key focus of the restoration works. This includes planting of preferred koala habitat trees alongside the Georges River riparian corridor, which is identified as a Strategic Link Area in the Campbelltown Koala Plan of Management.

Refer to Section 8 of **Attachment 2**. **BDAR** and Section 3 of **Attachment 7. KAR**

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

The Australian Government has formally endorsed the NSW Biodiversity Offsets Scheme through the Environment Protection and Biodiversity Conservation Act Condition-setting Policy. Should the proposed action be determined a controlled action, it is anticipated that the controlled action will be assessed in accordance with the bilateral assessment agreement Amending Agreement No. 1.

Offset obligations have been calculated under the BOS as follows:

- Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (PCT 3320) requires the retirement of 39 hollow bearing ecosystem credits
- Koala Phascolarctos cinereus (combined populations of Qld, NSW and the ACT) requires the retirement of 31 species credits

For the purposes of approval under the EPBC Act, it is a requirement that offsets directly contribute to the ongoing viability of the specific protected matter impacted by a proposed action and deliver an overall conservation outcome that improves or maintains the viability of the MNES i.e. ‘like for like’.

Like-for-like includes protection of native vegetation that is the same ecological community or habitat being impacted (preferably in the same region where the impact occurs), or funding to provide a direct benefit to the matter being impacted (e.g. threat abatement, breeding and propagation programs or other relevant conservation measures).

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	Actitis hypoleucos	Common Sandpiper
No	No	Apus pacificus	Fork-tailed Swift
No	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Calidris melanotos	Pectoral Sandpiper
No	No	Charadrius leschenaultii	Greater Sand Plover, Large Sand Plover
No	No	Cuculus optatus	Oriental Cuckoo, Horsfield's Cuckoo
No	No	Gallinago hardwickii	Latham's Snipe, Japanese Snipe
No	No	Hirundapus caudacutus	White-throated Needletail
No	No	Motacilla flava	Yellow Wagtail
No	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Pandion haliaetus	Osprey
No	No	Tringa nebularia	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 area does not provide habitat considered to not provide habitat important to any of the migratory species listed above in 4.15 (see **ATTACHMENT 8.** Migratory Habitat Assessment Table).

Most of these species are non breeding migratory waders that require shoreline or other wetland substrates as habitat when visiting Australia. Other non breeding migratory species are considered unlikely to be found using the project area and have not been observed using or flying over the project area during surveys.

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 proposed action is not a nuclear action and will not any directly or indirectly impact on this protected matter.

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.

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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 area is not located proximal to a Commonwealth Marine Area and the proposed activities would not result in an indirect impact on 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 area is not located proximal to the Great Barrier Reef and would not indirectly impact on this protected matter.

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 proposed activity is not related to any large coal mining development or coal seam gas.

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.

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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. *

Holsworthy Barracks (DD_0382 & DD_3043)

Holsworthy Barracks has one of the Army's major footprints within NSW and is home to a number of Army and tri-service training institutions as well as various Regular and Reserve Army Units. Holsworthy Barracks is also the staging location for domestic operations in NSW and covers almost 20,000 hectares.

The Holsworthy Barracks are physically separated from the project area by Cambridge Avenue and the Georges River.

The proposal will not directly or indirectly impact on this protected matter. It is further noted that the development aims to prevent the further contamination of the landscape and any external materials.

AAC Hurlstone Agricultural High School (DD_3043)

The project area is located approximately 1.4km southwest from the AAC Hurlstone Agricultural High School (DD_3043), as the crow flies; and is physically separated by Cambridge Avenue, Railway Parade and the East Hills Railway Line.

The proposal will not directly or indirectly impact on this protected matter.

Cubbitch Barta National Estate Area (CHL_105405)

The Cubbitch Barta National Estate Area is an 18,000-hectare, highly protected Indigenous heritage site located within the Holsworthy Military Area. Bounded by the Georges River, Holsworthy Barracks, Heathcote Road, and the Dharawal State Recreation Area, along with Cambridge Avenue, the estate area is physically isolated from the project area; and will not be directly or indirectly impacted by the proposal.

It is further noted that the development aims to prevent the further contamination of the landscape and any external ecological or archaeological materials. The landscape works proposed are unlikely to impact the visual or heritage values of this protected matter.

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.

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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 proposal will directly or indirectly impact on any matters beyond the immediately locality of the GWS site and therefore will not impact on this protected matter.

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 Site is a former landfill and so has limited opportunity for alternative uses or activities. Utilising the site for an alternate purpose outside of industrial uses would not align with the E4 General Industrial land zoning, would contradict the desired outcomes for the site and, including employment generation and strategic alignment with regional industrial land demand, and would be problematic given the historical waste management and landfill activities that have occurred on the site. In particular, the following alternatives were not considered suitable or appropriate:

- Do Nothing – Retaining the existing waste and resource recovery operations would not provide an appropriate or desirable outcome, given the facility is nearing the end of its operational life. It would fail to utilise a large, strategically located landholding for employment-generating uses, be inconsistent with the objectives of the E4 General Industrial zone, and would not capitalise on the Site's connectivity to key freight corridors or contribute to the industrial floorspace needs of Western Sydney.
- Use of the Site for an Alternative Purpose – Non-industrial uses are generally prohibited under the E4 General Industrial zoning. Alternate industrial uses were also not considered the highest and best use of the Site, noting significant regional demand for large-format warehousing, limited supply of serviced industrial land in Western Sydney, and the Site's suitability for warehouse and distribution uses given its size and proximity to major transport routes.
- Alternative Design and Layout – The design and layout of the proposal has been shaped by a range of factors, including the Glenfield Industrial Estate Site-Specific DCP, the interface with the Georges River riparian corridor, existing site operations, topography, biodiversity and heritage considerations, proximity to sensitive receivers, and market expectations for large-format speculative warehouse development. These constraints and requirements informed the current layout as the most efficient and feasible arrangement.

5. Lodgement

5.1 Attachments

1.2.6 Commonwealth or state legislation, planning frameworks or policy documents that are relevant to the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 2. BDAR.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	05/02/2026		High

1.2.7 Public consultation regarding the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 6. Engagement Report.pdf An overview of community consultation activities and outcomes to inform the preparation of the project's SSD submission	19/11/2025	No	High

3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 1. Figures 1-3.pdf Figures showing location and site context of the project area	08/02/2026	No	High

3.1.2 Existing or proposed uses for the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 1. Figures 1-3.pdf Figures showing location and site context of the project area	07/02/2026		High

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

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 1. Figures 1-3.pdf Figures showing location and site context of the project area	07/02/2026		High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 2. BDAR.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	06/02/2026	No	High

#2.	Document	ATTACHMENT 7. KAR.pdf An assessment of core and potential koala habitat under both the CKPoM and the State Environmental Planning Policy (Biodiversity and Conservation) 2021 against the most recent data collected from the project area	07/12/2025		High

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

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 3. Statement of Heritage Assessment.pdf Preliminary historical heritage assessment for the Glenfield Industrial Precinct, Cambridge Avenue Glenfield	17/10/2024	No	High

3.3.2 Indigenous heritage values that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 4. ACHAR_Redacted_Part 1.pdf Redacted report (pages 1-65) detailing the results of an Aboriginal archaeological and cultural heritage assessment prepared for land situated at 2 Cambridge Avenue, Glenfield, New South Wales	25/02/2026	Yes	High
#2.	Document	ATTACHMENT 4. ACHAR_Redacted_Part 2.pdf Redacted report (pages 66-155) detailing the results of an Aboriginal archaeological and cultural heritage assessment prepared for land situated at 2 Cambridge Avenue, Glenfield, New South Wales	25/02/2026	Yes	High

3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 5. Water Cycle Management.pdf An assessment of the civil engineering characteristics of the development site and technical considerations of the following aspects: earthworks & geotechnical considerations; and Water Cycle Management Strategy (WCMS).	14/11/2025	No	High

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 2. BDAR.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	05/02/2026		High

4.1.4.5 (Threatened Species and Ecological Communities) Why you consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 2. BDAR.pdf Biodiversity Development Assessment Report prepared to support the SSD in accordance with the NSW Biodiversity Assessment Method.	05/02/2026		High
#2.	Document	ATTACHMENT 7. KAR.pdf An assessment of core and potential koala habitat under both the CKPoM and the State Environmental Planning Policy (Biodiversity and Conservation) 2021 against the most recent data collected from the project area	08/12/2025	No	High

4.1.5.3 (Migratory Species) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	ATTACHMENT 8. Migratory Species Habitat Summary Table.pdf Summary of habitat requirements of migratory species listed in referral.	10/02/2026	No	High

5.2 Declarations

Completed Referring party's declaration

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

ABN/ACN	22692896674
Organisation name	ECOLOGIQUE AUST. PTY LTD
Organisation address	12 Wanganella St Balgowlah NSW 2093
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. *

☑ Check this box to confirm these are the correct identification details. *

☑ By checking this box, I, **Kat Duchatel of ECOLOGIQUE AUST. PTY LTD**, 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. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

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	000346216
Organisation name	J.C. & F.W. KENNETT PTY LTD
Organisation address	2167 NSW
Representative's name	Jacqui Kennett

Representative's job title	Director
Phone	0408 531 476
Email	jacqui@glenfieldwaste.com
Address	2 Cambridge Ave, Glenfield NSW 2167

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

☑ Check this box to confirm these are the correct identification details. *

☑ I, **Jacqui Kennett of J.C. & F.W. KENNETT PTY LTD**, 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. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

✔ 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.

Same as Person proposing to take the action information.

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

☑ Check this box to confirm these are the correct identification details. *

☑ I, **Jacqui Kennett of J.C. & F.W. KENNETT PTY LTD**, 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. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.