Project Maverick Bulk Earthworks and Internal Works

Application Number: **03293** Commencement Date: **12/01/2026** Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Project Maverick Bulk Earthworks and Internal Works

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 *

01/09/2026

1.1.4 Estimated end date *

31/07/2029

1.2 Proposed Action details

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

The proponent for the project is Goodman Property Services (Aust) Pty Ltd (Goodman), which is the entity proposing to undertake the proposed action. The project is proposed to be completed under two State Significant Development Applications as follows:

- **SSD-97711727 | 225-245 Martin Road, Bradfield Bulk Earthworks**
    - demolition of existing structures, importation of fill by truck and undertaking of earthworks to ensure the land is suitable for future warehousing and other urban infrastructure as proposed under SSD-97688711
- **SSD-97688711 | Project Maverick – Internal Works**
    - Construction, fit-out and operation of 14 warehouses, active open space and amenities precinct (including a café), and internal estate infrastructure works, including:
        - internal estate roads
        - corridor reservation and partial construction of the Eastern Ring Road and east west primary arterial road ('H-Road')
        - landscaping and car parking
        - regional stormwater and drainage infrastructure
        - subdivision

The proposed action predominantly relates to SSD-97711727. The works are proposed within the property located at 225-245 Martin Road, Bradfield NSW 2556 and comprises an area of 189.5ha, and is referred throughout this Referral as the 'Project Maverick Site' (see **Attachment A – Figure 1**).

The SSD is largely located within the boundaries of the Western Sydney Growth Centres and so is largely biodiversity certified under the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (Growth Centres SEPP) and so no further biodiversity assessments under the EPBC Act are required for these areas (see **Attachment A – Figure 2**). Two portions of the SSD fall outside of the existing biodiversity certification (bio-certification) area and so do require a biodiversity assessment under the EPBC Act. These areas together comprise an area of approximately 6.97ha, and are hereafter referred to as the 'Project Area'. The entire disturbance area (including that in certified land) is approximately 159.23ha (see **Attachment A – Figure 1**). The proposed works include:

- Proposed development works that entail bulk earthworks to regrade the site, the associated vegetation clearance, and enabling site works within the disturbance footprint as shown in **Attachment A – Figure 1**, to facilitate development of land in accordance with the Project Maverick Master Plan (see **Attachment A – Figure 3**); and
- Proposed conservation works that entail conservation and rehabilitation of native flora and fauna within the retention areas as shown in **Attachment A – Figure 1**.

It is important to note that the proposed works that extend outside the current certified land under the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (Growth Centres SEPP) are required to facilitate the development in accordance with the *Western Sydney Aerotropolis Precinct Plan (2024)* (Precinct Plan) which is in force under the *State Environmental Planning Policy (Precincts – Western Parkland City) 2020, Chapter 4 Western Sydney Aerotropolis* (the WPC SEPP). It therefore prevents any ability to mitigate on the non-certified land in order to deliver the development in accordance with the Precinct Plan as required under Section 4.49 and associated zoning as envisaged under the WPC SEPP.

The purpose of the proposed development works is to seek consent to continue and extend the remediation, quarrying and bulk earthworks footprint to be consistent with Precinct Plan as required by Section 4.49 of the WPC SEPP. The new SSD consent for Bulk Earthworks (SSD 97711727) is proposed to supersede MP10_0014 quarrying consent, and will be for site preparation works only (i.e. no buildings, retaining walls or other infrastructure works), including the rehabilitation of areas disturbed by historic mining and brick-making operations, as well as remediation and bulk earthworks across other areas of the disturbance area to make the it suitable for intended future land use as envisaged under SSD 97688711.

The disturbance area has historically been used for quarrying, most recently authorised by the project approval MP 10_0014 as noted above. As part of the approved mining operations, rehabilitation strategies have been established to ensure that once the mining activity cease, the Project Maverick site is readily available for future uses. It is proposed that these rehabilitation strategies are continued under this SSD-977112727 proposed application. The proposed development works include the clearing of all vegetation within the disturbance footprint to facilitate future development of land in accordance with the Project Maverick Master Plan. The proposed development works are also necessary to support land remediation activities, and conservation works in accordance with the Vegetation Management Plan (VMP) that is proposed under SSD-97688711 for portions of the retention areas. The proposed development works also do not include future commercial development, which will be covered by subsequent development applications (DAs).

The proposed development works require the clearing of approximately 6.9ha of vegetation within the Project Area (i.e. within non-certified land), most of which (approximately 74%) is comprised of exotic-dominated grassland that offers very little ecological value other than marginal foraging habitat for fauna species. There is a small patch of EPBC Act listed Riverflat Eucalypt Forest (approximately 0.07ha) located in the central portion of the project area, which is known as the 'avoidance area' as it will be avoided as part of the project (**Attachment A - Figure 1 The project area**).

The remaining non-certified land is to be retained as legislated under the Precinct Plan and zoned under the WPC SEPP. Furthermore, Goodman proposes to rehabilitate the remaining non-certified land not identified to be acquired for local drainage and open space under the Land Acquisition Map in the WPC SEPP and reflected in the *Liverpool City Council Aerotropolis S 7.12 Contributions Plan 2024* (Liverpool Contributions Plan), which comprises an area of approximately 18.87 ha of vegetation of which will be subject to weed removal and revegetated (where necessary). Additionally, there will be a second retention area within the ENZ zoned land on the western portion of the Project Maverick site, that comprises the riparian area surrounding Badgery's Creek and is approximately 10.59ha. The two retention areas are shown in **Attachment A – Figure 1**, and will be known as the 'Badgery's Creek retention area' in the west and 'South Creek retention area' in the east. They will be managed in accordance with the VMP that will be prepared for the project, and will focus on the following:

- Reconstructing areas of the retention area currently mapped as exotic vegetation communities to native vegetation, using bushland regeneration and revegetation techniques; and
- Promote regeneration of areas of the retention area currently mapped as remnant native vegetation through appropriate weed control techniques.

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).

In addition to the SSD - 97711727, there are currently two (2) further applications in the works for the Project Maverick site. These are:

1. State Significant Development Application – Internal Works' (Internal works SSDA) for the construction, fit-out and operation of 14 warehouse buildings, amenities precinct & café. The application also includes the construction of Sydney Water Stormwater basins and internal estate infrastructure works in line with Connecting to Country and Precinct Plan objectives.

2. State Significant Development Application – External Works' (External works SSDA) for the external lead in infrastructure works (roads and services) for the Project Maverick site that will detail an operational access strategy that is consistent with the Precinct Plan.

Cumulatively, these three applications seek to facilitate the development of a new industrial estate at the Project Maverick site.

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 following Commonwealth and state legislation, planning frameworks and policy documents that apply to the project include the following:

- *Environment Planning and Assessment Act 1979* (EP&A Act);
- *Biodiversity Conservation Act 2016* (BC Act);
- *State Environmental Planning Policy* (Precincts – Western Parkland City) 2021;
    - Order to confer biodiversity certification on the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006*
    - *Western Sydney Aerotropolis Precinct Plan (2024)*
- *State Environmental Planning Policy* (Biodiversity and Conservation) 2021 (Biodiversity and Conservation SEPP);
- *Western Sydney Aerotropolis Development Control Plan 2022* (Aerotropolis DCP); and
- Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The proposal is classified as Integrated Development and Designated Development under the EP&A Act, and therefore Secretary's Environmental Assessment Requirements (SEARs) for the Project were issued for the Project by the NSW Department of Planning and Environment (DPE). The ecological components of the SEARs will be addressed in the BDAR being prepared for the Project.

Under the BC Act, all development that requires development consent under Part 4 of the EP&A Act that is likely to significantly affect threatened species must be assessed using the Biodiversity Assessment Method 2020 (BAM) with the results presented in a Biodiversity Development Assessment Report (BDAR). A BDAR is currently being prepared for the Project.

The Sydney Regional Growth Centres SEPP is applicable to the proposed action as the Project Maverick site is largely located within the boundaries of the Western Sydney Growth Centres and therefore has been biodiversity certified under the former Growth Centres SEPP (now repealed and consolidated under the WPC SEPP). The purpose of this SEPP is to co-ordinate the release of lands within growth centres for development that allows for comprehensive planning to ensure that controls are implemented to improve outcomes associated with sustainability, infrastructure, waterways, heritage and biodiversity. The project area, ie the portion of the proposed development that does not lie within certified land, is not biocertified and so requires biodiversity approval under both the BC Act and the EPBC Act.

The Biodiversity and Conservation SEPP came into force on 1 March 2022 and consolidates and repeals the provisions of several SEPPS, including the following SEPPs listed in the SEARs:

- State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017;
- State Environmental Planning Policy (Koala Habitat Protection) 2021;

State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 applies to multiple non-rural areas of the state of NSW, including the City of Liverpool LGA. However, as the proposed works, including vegetation removal, comprise a Part 4 DA that requires development consent, permits for clearing of vegetation under the SEPP are not relevant to the proposed action.

The Koala Habitat Protection SEPP is applicable to the proposed action. The City of Liverpool LGA is identified as being an LGA to which this SEPP applies. Any lands that contain primary and/or secondary Koala feed trees may constitute Potential Koala Habitat or Core Koala Habitat. The project area contains Koala feed trees and therefore this SEPP is applicable. No Core Koala Habitat has been identified within the project area.

The *Western Sydney Aerotropolis Development Control Plan 2022* (Aerotropolis DCP) was prepared in accordance with the EP&A Act, the WPC SEPP and the Aerotropolis Precinct Plan. In terms of biodiversity, the Aerotropolis DCP aims to ensure consistency with the requirements of the relevant bio-certification and implements the Growth Centres SEPP bio-certification order where applicable.

This document comprises an assessment against the requirements of the EPBC Act.

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. *

Community Engagement

- A community newsletter was distributed to 1,403 properties within a 4 km radius of the Project Maverick site on Thursday 6 November 2025. This newsletter provided an overview of the planning applications proposed and how residents and surrounding businesses could make enquires, request further information and provide feedback.
- A letter was distributed to 44 of the Project Maverick site's closest neighbours along Martin Road, Lawson Road and Victor Avenue on Thursday 6 November 2025. The letter introduced the SSDA's, provided a high-level overview of the engagement program and offered a project briefing.
- A project briefing was held with Cleanaway on Thursday 27 November with the Goodman project team. An overview of the proposal was provided and questions answered around the intersection works.
- Western Sydney Aerotropolis Community Consultative Committee – Social Impacts Assessment interview held with representative from the Committee on 15 December 2025.
- Community Briefing sessions with nearby neighbours on Lawson Road and Martin Road were facilitated by Urbis and Goodman on 29 January 2026 at the Bringelly Community Centre.

Authority Engagement

- Department of Planning, Housing and Infrastructure
    - Planning and Assessment team
    - Strategic Planning team
    - Infrastructure contributions
- Department of Climate Change, Energy, the Environment and Water
    - Conservation Programs, heritage and Regulation Group
    - Water Group
    - Heritage NSW
- NSW Premiers Department
- Government Architect NSW
- Liverpool City Council
    - Planning and Assessment
    - Social Planner
    - Voluntary Planning Agreement team
- Transport for NSW
- Infrastructure NSW
- NSW EPA
- NSW Health
- NSW Treasury
- Mining Resources Regulator
- Bradfield Development Authority
- NSW Rural Fire Service
- Sydney Water
- Water NSW
- Western Sydney Airport Corporation
- Western Sydney International Airport
- Civil Aviation Safety Authority
- Jemena
- Endeavour Energy
- Dharug Traditional Custodians
- Local Knowledge holders

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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Alternatively, email us at privacy@dcceew.gov.au.

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1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN	29001584612
Organisation name	SLR CONSULTING AUSTRALIA PTY LTD
Organisation address	2060 NSW

Referring party details

Name	Alix Murray
Job title	Senior Ecologist
Phone	0438377898
Email	alix.murray@slrconsulting.com
Address	4/79-81 Hannan Street

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	40088981793
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 Australia

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

ABN/ACN	40088981793
Organisation name	GOODMAN PROPERTY SERVICES (AUST) PTY LIMITED
Organisation address	2018 NSW

Proposed designated proponent 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 Australia

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	29001584612
Organisation name	SLR CONSULTING AUSTRALIA PTY LTD
Organisation address	2060 NSW
Representative's name	Alix Murray
Representative's job title	Senior Ecologist
Phone	0438377898
Email	alix.murray@slrconsulting.com
Address	4/79-81 Hannan Street

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	40088981793
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 Australia

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

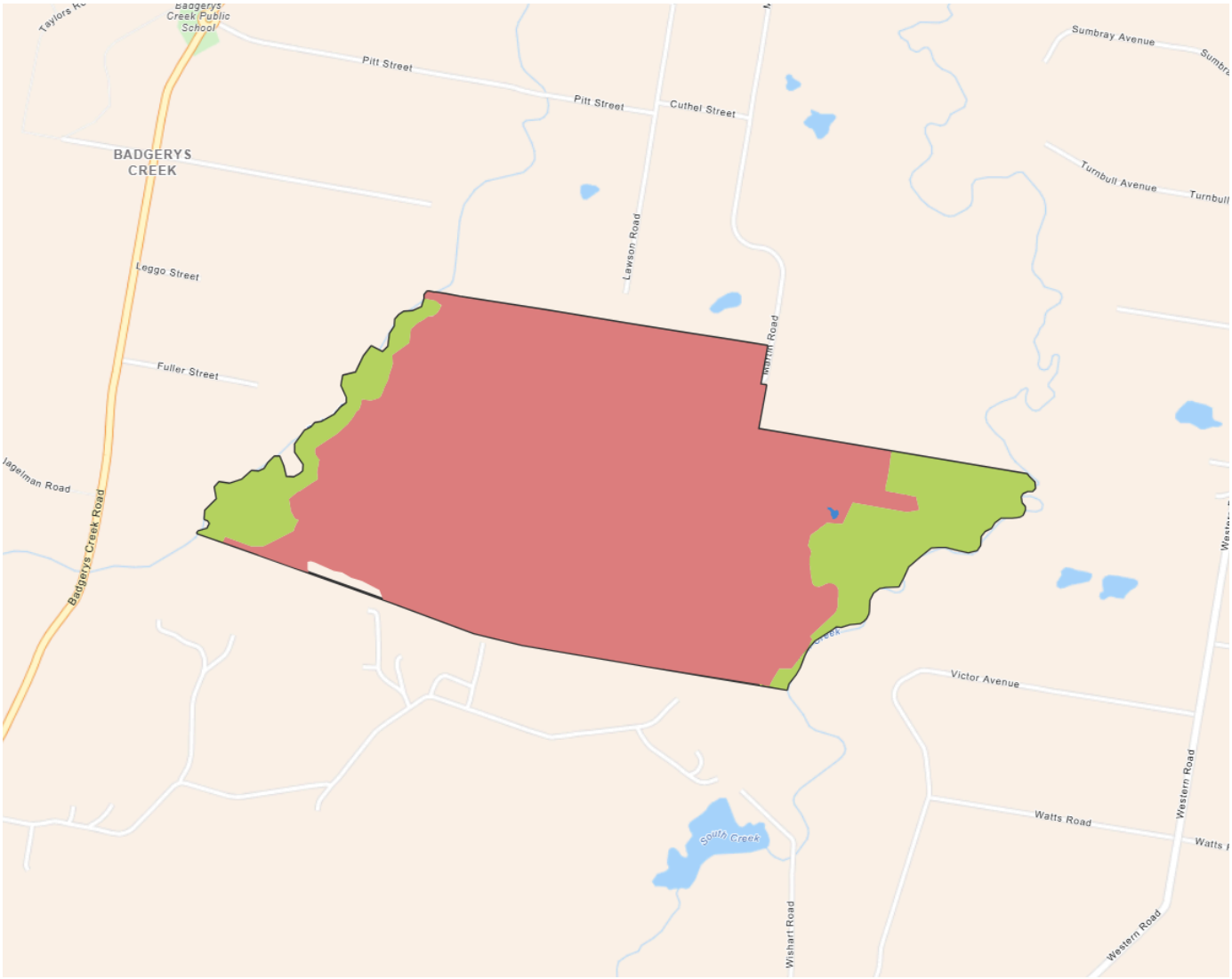
1.4 Payment details: Payment allocation

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: 189.51 Ha **Disturbance Footprint:** 159.24 Ha **Avoidance Area:** 0.07 Ha **Retention Area:** 29.46 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

225-245 Martin Road, Bradfield, NSW 2556

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? *

Goodman have owned the Project Maverick site from the 19 December 2025, and will continue to own it in the long-term. The future roads and parkland areas are to be dedicated to Liverpool City Council.

3. Existing environment

3.1 Physical description

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

The Project Maverick site is largely an operational quarry and historically had a brickmaking facility. The structures and hardstand areas used for the quarry operations are located in the central portion of the site, connected by an internal road network. In addition, three pits are located along the southern portion of the Project Maverick site. The remaining portion of the Project Maverick site, including the project area, comprises remnant native vegetation over an exotic dominated grassland that is utlised for agricultural purposes.

The project area is located within non-certified land directly to the east of the quarry. The vegetation in the project area is relatively disturbed, which reflects a land use history of years of cattle grazing, as visible in **Attachment A – Figure 6 Historical imagery from 1969**. As a result, the understorey of the woodland in the project area lacks a shrub layer or high diversity of native herbs and grasses. Overall, the grassland areas of the project area represent areas with lower ecological condition, whilst the woodland areas of the project area, although in a degraded condition, still has an ecological condition that is sufficient in parts to meet the threshold for listing as Critically Endangered Ecological Communities under the EPBC Act, as per the relevant conservation advice. The surrounding land use in adjacent lands is primarily agricultural, with a dense riparian corridor along South Creek.

The native vegetation communities recorded in the project area (see **Attachment A – Figure 4**) associated with TECs listed under the EPBC Act includes:

- Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest, listed as a critically endangered ecological community (CEEC) under the EPBC Act); and
- River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria, listed as a CEEC under the EPBC Act;

In addition, Freshwater Wetlands on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions is also present, which is listed as an EEC under the BC Act, but not the EPBC Act. Swamp Oak Floodplain Forest, which is listed as an EEC under the BC Act and the EPBC Act, is present within areas of the Project Maverick site, however this will not be impacted as part of the proposed action.

The project area has not recently been impacted by bushfire or other major events, however it is prone to partial flooding during periods of heavy rainfall.

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

The Project Maverick site is currently an operational Quarry and historically had a Brickmaking Facility. The structures and hardstand areas used for the quarry operations are located in the central portion, connected by an internal road network. In addition, three pits are located along the southern and southeast portion of the Project Maverick site.

The remaining portion of the Project Maverick site, including the project area, consists of agricultural land, with remnant canopy trees over an exotic dominated ground layer, with minimal understory vegetation. The vegetation onsite conforms to the threatened ecological communities (TEC) Cumberland Plain Woodland, River-flat Eucalypt Forest, Swamp Oak Floodplain Forest and Freshwater Wetlands. The Cumberland Plain Woodland present conforms to a Critically Endangered Ecological Community listed under the BC Act, while River-flat Eucalypt Forest, Swamp Oak Floodplain Forest and Freshwater Wetlands conform to an Endangered Ecological Communities listed under the BC Act.

The Project Maverick site, and therefore the project area, are zoned as a mix of ENT - Enterprise and ENZ - Environment and Recreation (see **Attachment - Figure 5 Land Zoning**).

The proposed works in the project area include site-wide bulk earthworks to regrade the site, the associated clearing of native vegetation, and enabling site works, and the conservation and rehabilitation of native flora and fauna habitat within the retention area, as shown in Figure 1 (see **Attachment – 'Figure 1 The project area'**). The proposed development works include the clearing of all vegetation within the disturbance footprint, to facilitate future development of land in accordance with the Project Maverick Master Plan. The exact details of future construction are unknown but will be provided within any relevant future DAs for the Project Maverick site.

The proposed development works are also necessary to support land remediation activities, and conservation works in accordance with the VMP that is proposed under SSD-97688711.

The proposed use for the project area is for the construction of 14 warehouses and associated structures, which will be instrumental to support the demand for industrial and employment land in a key location within the Badgerys Creek Precinct within the Western Sydney Aerotropolis. The proposal also reflects a cohesive rehabilitation, quarrying and bulk earthworks strategy that aligns with the Western Sydney Aerotropolis Plan (WSAP) Precinct Plan and Connecting to Country guidelines.

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

The project area does not possess any outstanding natural features, and it comprises land currently used for livestock grazing. The project area does however contain important and unique values associated with the natural bushland that occurs, including areas of CEECs and EECs listed under the BC Act and EPBC Act.

South Creek is present along the eastern portion of the Project Maverick site, which forms the basis for the South Creek retention area. The western portion of the Project Maverick site contains Badgery's Creek and its associated riparian corridor, and this area of native vegetation forms the basis of the Badgery's Creek retention area (see **Attachment – Figure 1 the project area**).

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

The project area occurs on a eastern-facing slope.

The highest natural point of the Project Maverick site is at 65 metres ASL at the western end, prior to Badgery's Creek.

The lowest natural point of the Project Maverick site is at 47.5 metres ASL in the south-east corner of the site near South Creek. This equates to a gradient of approximately 2% across the Project Maverick site.

The Project Maverick site is currently utilised as a quarry, and so the highest point in the entire site is 74m and the lowest is 44m, however these are man-made heights as a result of the quarrying activities.

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 and the additional non-certified land within the Project Maverick site has been subject to ecological assessment for the purposes of the future SSDAs. Based on surveys undertaken to date by SLR Consulting, the project area comprises the following features:

- Scattered woodland patches, with grazed understory; and
- Derived native and exotic dominated grasslands areas, which have been subject to grazing.

The project area has a history of agricultural development, which resulted in the degradation and clearing of native vegetation across a high proportion of the project area. Due to the historical disturbance in the form of grazing and pasture improvement across large areas of the Maverick Project Site, fauna habitats for MNES species within the project area are largely limited to areas of remnant woody vegetation.

Based on studies undertaken to date and a review of existing species records in the NSW BioNet Atlas, the woodland areas within the project area are considered to provide potential habitat for the following species that are MNES:

- Grey-headed Flying-fox (*Pteropus poliocephalus)*: The woodland and forest patches in the project area constitutes foraging habitat for this species as part of a broader foraging range. There is no breeding habitat present within the project area (i.e. no camps).
- White-throated Needletail (*Hirundapus caudacutus):* The woodland patches in the project area constitutes foraging habitat for this species as part of a broader foraging range.
- Swift Parrot (*Lathamus discolor):* The woodland patches in the project area constitutes foraging habitat for this species as part of a broader foraging range.
- Latham's Snipe (*Gallinago hardwickii)*: Although no habitat occurs within the project area, this species has been recorded within the South Creek retention area and so has been included in the assessment.
- Diamond Firetail (*Stagonopleura guttata*): The woodland patches in the project area constitutes foraging habitat for this species as part of a broader foraging range.

Due to disturbed nature of the project area, with a long history of cattle grazing and pasture improvement, the understorey of the vegetation that occurs in the project area is degraded and lacks a dense shrub layer or high diversity of native herbs and grasses. As a result, it is unlikely that the project area is important habitat for any threatened fauna species that are MNES.

During the surveys undertaken by SLR Consulting, the only ecological community within the project area that meets the EPBC Act listing thresholds is:

- River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria.

A full list of the flora and fauna species that have been recorded within the Project Maverick site can be found in **Attachment C - Flora and Fauna List**.

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

The proposed action in the project area will have the following impact on native vegetation communities:

- 0.72 ha of Cumberland Plain Woodland in the Sydney Basin Bioregion, of which occurs in two conditions, including 0.65 ha of woodland and 0.07 ha of grassland;
- 5.69 ha of River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria, of which occurs in two conditions, including 0.16 ha of woodland (the only vegetation community that conforms to the EPBC Act listing within the project area), of which 0.07ha is within the avoided area (**Attachment A: Figure 1**) and 5.53 ha is grassland; and
- 0.55 ha Freshwater Wetlands on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions.

Note that none of the Cumberland Plain Woodland vegetation community mapped within the project area conforms to the EPBC Act listed vegetation community Cumberland Plain Shale Woodland and Shale-Gravel Transition Forest as the patch size is too small, and the perennial understorey is comprised of less than 30% of native species. Additionally, the grassland condition class of the River-flat Eucalypt Forest community does not conform to the EPBC Act listed vegetation community River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria as the canopy crown cover is less than 20%.

A description of the native vegetation communities present within the project area are provided below. whilst the distribution of vegetation communities within the project area is shown in **Attachment A – Figure 4 Vegetation Mapping of the Project Area**. The distribution of vegetation communities within the project area listed under the EPBC Act project area is shown in **Attachment A – Figure 7 EPBC Act Listed Communities**

Cumberland Plain Woodland

Cumberland Plain Woodland occurs as a patch in the centre of the project area, where it occupies areas of slightly higher elevation than Riverflat Eucalypt Forest, on areas of Bringelly Shale of the Wianamatta Group, in transitional areas between the Blacktown and South Creek soil landscapes. It occurs as two condition states - woodland and grassland, neither of which meet the EPBC Act listing.

The woodland condition zone of Cumberland Plain Woodland has canopy trees present, predominately of the species *Eucalyptus moluccana* and *Eucalyptus teretricornis*. Due to historical modification for agriculture, native shrub species are absent from this occurrence, and the ground layer is dominated by exotic grass species, and exotic forbs are common. There are scattered individuals of exotic shrubs include *Solanum sisymbriifolium,* and *Lycium ferocissimum* (African Boxthorn). The native species present with the highest cover in the ground layer is *Microlaena stipoides* var. *stipoides* (Weeping Grass), with the exception of *Cynodon dactylon* var. *dactylon* (Couch), a variety that is currently considered exotic by all state herbaria in Australia and in the Flora of Australia, but is currently on a precautionary basis considered native by the NSW Herbarium. Scattered individuals of the native grass *Sporobolus creber* (Rat's Tail Grass) are also present. Native forbs are present and have a sparse and scattered distribution through the ground layer. Species present include *Dichondra repens* (Kidney Weed), *Asperula conferta* (Common Woodruff), and *Einadia nutans* subsp. *nutans* (Climbing Saltbush). Dominant exotic species in the ground layer, with the exception of *Cynodon dactylon* var. *dactylon* (Couch), are *Lolium perenne* (Ryegrass), *Ehrharta erecta* (Panic Veldtgrass), *Bromus catharticus* (Prairie Grass), and *Cenchrus clandestinus* (Kikuyu). Exotic forbs are common and include *Modiola caroliniana* (Red-flowered Mallow), *Senecio madagascariensis* (Fireweed), and *Hypochaeris radicata* (Catsears).

The grassland condition zone of Cumberland Plain Woodland are highly dominated by exotic species. They areas lack native trees and shrub species. The native species present with the highest cover is *Sporobolus creber,* with the exception of *Cynodon dactylon* var. *dactylon* (Couch) a Couch variety that is currently considered exotic by all state herbaria in Australia and likely exotic but on a precautionary basis considered native by the NSW Herbarium. *Microlaena stipoides* var. *stipoides* (Weeping Grass) is also present. *Cynodon dactylon* var. *dactylon* accounts for 30% of a total of a cover of approximately 39% native

coverage in the BAM plot undertaken in this zone. The only native forb recorded was *Oxalis perennans.* Exotic grass species are dominant, and with the exception of *Cynodon dactylon* var. *dactylon* include *Cenchrus clandestinus, Paspalum dilatatum* (Paspalum)*,* and *Lolium perenne*. Exotic forbs present include *Plantago lanceolata* (Lamb's tongues), *Senecio madagascariensis,* and *Cerastium glomeratum* (Mouse-ear Chickweed).

Freshwater Wetlands

Freshwater Wetlands occurs as scattered patches in the northern portion of the project area, with the largest patches at the lowest elevation areas in the centre. These patches are dominated by native aquatic species, and occur in damp areas on quaternary alluvium on the South Creek soil landscape.

Freshwater Wetlands occurs in areas that experience natural ephemeral inundation, and comprise treeless wetland areas dominated by aquatic sedges, forbs and rushes. Dominant species include the sedge *Carex appressa,* the rush *Juncus usitatus*, and the grass *Paspalum distichum*. Some forbs such as *Persicaria decipiens* and *Ranunculus inundatus* (River Buttercup) are sub-dominant in some areas, and other forbs are present and include *Lythrum hyssopifolia* (Hyssop Loosestrife) and *Ottelia ovalifolia* (Swamp Lily).

Exotic aquatic species are common, and sub-dominant in some areas, with the most common species including the forb *Ranunculus sceleratus,* the sedge *Cyperus eragrostis* (Umbrella Sedge), and the grass Paspalum dilatatum.

Riverflat Eucalypt Forest

Riverflat Eucalypt Forest occurs across most of the project area, in the north occurring as a mosaic with other floodplain communities. It occurs on quaternary alluvium associated with the South Creek soil landscape. It occurs as two condition states: woodland and grassland, with only woodland meeting the EPBC Act listing.

The woodland condition zone occurs as patch predominately in the central area of the project area. The ground layer is dominated by exotic species which comprise much of the groundcover, and the shrub layer only sparsely contains native species. The canopy is dominated by *Eucalypts amplifolia* subsp. *amplifolia*, and *Eucalyptus moluccana* and *Eucalyptus tereticornis* occur less frequently. A sub-canopy is present in some areas, and where present is dominated by *Melaleuca decora.* The native shrub *Bursaria spinosa* is present and sparse in the shrub layer.

Microlaena stipoides var. *stipoides* (Weeping Grass) is the most common species in the ground layer, with the exception of *Cynodon dactylon* var. *dactylon* (Couch), which as mentioned previously, is considered exotic by most botanical authorities in Australia. Other native species include the sedge *Carex appressa, the rushes Juncus usitatus* and *Juncus subsecundus*, and the forbs *Einadia nutans* subsp. *nutans, Lythrum hyssopifolia,* and *Persicaria decipiens*.

Exotic species are dominant in the ground layer. Species include the grasses Ehrharta erecta and Lolium perenne, and the forbs *Senecio madagascariensis, Ranunculus sceleratus* and *Plantago lanceolata.*

The grassland condition zone has been mapped as a highly degraded form of Riverflat Eucalypt Forest due to the occurrence of some native species, but are in poor condition, and heavily dominated by exotic species. This condition zone occurs across much of the project area, in areas associated with the floodplain across the site, and subsequently quaternary alluviums. Native species present include the sedges *Carex appressa* and *Cyperus gracilis,* the rushes *Juncus subsecundus* and *Juncus usitatus*, the forbs *Wahlenbergia gracilis* (Slender Bluebell) and *Lythrum hyssopifolia,* the grasses *Microlaena stipoides* and *Sporobolus creber*.

Dominant exotic grasses include *Lolium perenne* and *Paspalum dilatatum*, and other exotics are common and includes the grasses *Axonopus fissifolius* (Carpet Grass) and *Eragrostis curvula* (African Lovegrass), the forbs *Lotus uliginosus* (Birds-foot Trefoil) and *Senecio madagascariensis,* and the sedge *Cyperus eragrostis.*

Soils

Information regarding soils and geology have been sourced mainly from the NSW Soil and Land Information System (SALIS) and includes soil hazards and landscapes mapping of the Sydney 1:100,000 map sheet.

The project area is mapped as the South Creek soil landscape. The South Creek soil landscape comprises flood plains on quaternary alluvium within the Cumberland Plain and is often associated with extensively cleared open forest on yellow, grey and brown podozolic soils.

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.

There are no Commonwealth Heritage places relevant to the project area.

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

An Aboriginal Cultural Heritage Assessment was undertaken by Artefact in support of the ER SSDA for the entire Project Maverick site in 2025. Based on the assessment undertaken, five Aboriginal archaeological sites display low significance and value. The assessment determined that impacts to low significance sites do no warrant non-practicable avoidance or mitigation. As this report is still in draft format, it cannot be attached to this Referral.

A land-based Aboriginal heritage impact permit (AHIP) is required for the proposed action, under section 90 of the *National Parks and Wildlife Act 1974*.

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. *

The Project Maverick site is located within the Wianamatta - South Creek Catchment, which is one of the hottest and driest catchments in the Greater Sydney Region.

A Groundwater Assessment Report has been prepared by Arcadis (see **Attachment D – Groundwater Assessment Report**) that provides specific focus on interactions with groundwater and potential impacts to aquifers, watercourses, water resource, and groundwater users arising from potential changes to groundwater levels.

The Project Maverick site sits between Badgerys Creek (located along the western boundary) and South Creek (located along the eastern boundary). The topography and drainage in the western portion of the falls towards Badgerys Creek, while topography and drainage in the eastern portion of the falls towards South Creek.

Within the Project Maverick site drainage occurs as both sheet flows and concentrated flows through ephemeral depressions and first order (Strahler) watercourses. Some local storages are present in the form of farm dams. Badgerys Creek and South Creek are both perennial watercourses along the reaches that run adjacent to the Project Maverick site.

Hydrology across the Project Maverick site (Badgerys Creek to South Creek) is heavily influenced by the Triassic Wianamatta Group geology and the Blacktown Soil Landscape. Clay soils in this area are highly reactive and may swell significantly in response to rainfall events leading to impermeable surface conditions. Subsequently, the Project Maverick site produces a rapid runoff response to rainfall resulting in high volumes of overland flow including sheet flows and concentrated flows in drainage depressions. Overland flow from hills and slopes will have prevalence to pond in depressions and foot slopes leading to swampy conditions.

The heavy clay subsoil creates a barrier that prevents water from draining vertically. This leads to "local perching" of water above clay layers, creating ephemeral waterlogged zones that persist long after the rain stops.

Assessment of the project against the NSW Aquifer Interference Policy Minimal Impact Considerations has been undertaken and indicates that the minimal impact thresholds are unlikely to be exceeded for water level, water pressure, and water quality as a result of the proposed bulk earthworks and final development. Consideration of the development in the context of the HGL suggests that the final development may contribute to improved groundwater quality outcomes as maximizing the size of impervious surfaces to prevent recharge of groundwater is a recommended salinity management measure for the Upper South Creek HGL.

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	Yes	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	Yes	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.

—

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. *

No World Heritage place occurs in or near the project area.

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. *

No National Heritage place occurs in or near the project area.

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. *

No Ramsar Wetlands occur in or near the project area.

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	Aprasia parapulchella	Pink-tailed Worm-lizard, Pink-tailed Legless Lizard
No	No	Botaurus poiciloptilus	Australasian Bittern
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	Climacteris picumnus victoriae	Brown Treecreeper (south-eastern)
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	Eucalyptus benthamii	Camden White Gum, Nepean River Gum
No	No	Falco hypoleucos	Grey Falcon
Yes	Yes	Gallinago hardwickii	Latham's Snipe, Japanese Snipe
No	No	Genoplesium baueri	Yellow Gnat-orchid, Bauer's Midge Orchid, Brittle Midge Orchid

Direct impact	Indirect impact	Species	Common name
No	No	Grantiella picta	Painted Honeyeater
No	No	Grevillea parviflora subsp. parviflora	Small-flower Grevillea
No	No	Haloragis exalata subsp. exalata	Wingless Raspwort, Square Raspwort
No	No	Heleioporus australiacus australiacus	Giant Burrowing Frog, Eastern Owl Frog
Yes	Yes	Hirundapus caudacutus	White-throated Needletail
Yes	Yes	Lathamus discolor	Swift Parrot
No	No	Litoria aurea	Green and Golden Bell Frog
No	No	Macquaria australasica	Macquarie Perch
No	No	Melanodryas cucullata cucullata	South-eastern Hooded Robin, Hooded Robin (south-eastern)
No	No	Neophema chrysostoma	Blue-winged Parrot
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	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 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
Yes	Yes	Pteropus poliocephalus	Grey-headed Flying-fox
No	No	Pterostylis saxicola	Sydney Plains Greenhood
No	No	Pultenaea parviflora	
No	No	Pycnoptilus floccosus	Pilotbird
No	No	Rhizanthella slateri	Eastern Underground Orchid

Direct impact	Indirect impact	Species	Common name
No	No	Rhodamnia rubescens	Scrub Turpentine, Brown Malletwood
No	No	Rostratula australis	Australian Painted Snipe
Yes	Yes	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
No	No	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. *

A report was generated using EPBC Protected Matters Search Tool to identify a list of threatened species and threatened ecological communities with potential to occur within the project area. Furthermore, species records held within the NSW BioNet were reviewed to identify threatened species previously recorded within a 10km radius of the project area. While vegetation communities were ground-truthed to confirm the extent of threatened ecological communities, a likelihood of occurrence assessment was undertaken for threatened species listed as MNES. A likelihood of occurrence assessment for threatened flora and fauna are provided in **Attachment E - Likelihood of Occurrence Tables**. This analysis established that the proposed action has the potential to impose an impact of some kind on three threatened fauna species, but not on any threatened flora species. Furthermore the proposed action has the potential to impact one threatened ecological community listed under the EPBC Act. A brief summary is provided for each impacted entity below.

Please note that the Latham's Snipe and the White-throated Needletail have been assessed under 'Migratory Species'.

FAUNA

Swift Parrot (*Lathamus discolor*) – potential direct and indirect impact.

Potential foraging habitat occurs in all of the suitable trees in the remnant woodland in the project area. The direct impact to potential foraging habitat for this species will occur in the permanent removal of approximately 0.74 ha of potential foraging habitat from the project area.

Indirect impacts have the potential to occur in the retained vegetation to the east of the project area. These are primarily edge effects such as weed incursions, light and noise.

Grey-headed Flying-fox (*Pteropus poliocephalus*) – potential direct and indirect impact.

Potential foraging habitat occurs in all of the suitable trees in the remnant woodland in the project area. The direct impact to potential foraging habitat for this species will occur in the permanent removal of approximately 0.74 ha of potential foraging habitat from the project area.

Indirect impacts have the potential to occur in the retained vegetation to the east of the project area. These are primarily edge effects such as weed incursions, light and noise

***Stagonopleura guttata* Diamond Firetail** - potential direct and indirect impact.

Potential foraging habitat occurs in all of the suitable trees in the remnant woodland vegetation in the project area. The direct impact to potential foraging habitat for this species will occur in the permanent removal of approximately 0.74 ha of potential foraging habitat from the project area.

Indirect impact has the potential to occur in the retained vegetation to the east of the project area. These are primarily edge effects such as weed incursions, light and noise.

FLORA

No EPBC Act listed flora species occur in the project area or are considered likely to occur and therefore no impacts to threatened flora species are predicted to occur.

ECOLOGICAL COMMUNITIES

Direct and indirect impacts on ecological communities are listed below.

River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria

The direct impact as a result of the proposed action on confirmed EPBC Act listed River-flat Eucalypt Forest in the project area is the permanent clearing of approximately 0.09 ha of the ecological community.

There is the potential for indirect impacts to occur to the River-flat Eucalypt Forest within the retention area to the east of the project area. The relevant potential indirect impacts include reduced viability of adjacent habitat due to edge effects, noise, dust or light spill, transport of weeds and pathogens from the site to adjacent vegetation and rubbish dumping. It is noted that portions of this area is proposed to be managed under a VMP which is anticipated to appropriately ameliorate any indirect impacts that may occur.

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

No

4.1.4.6 Describe why you do not consider this to be a Significant Impact. *

As assessment against the Commonwealth Significant Impact Guidelines for each of the four subject MNES is provided in the **Attachment F - Significant Impact Assessments**. As outlined within the impact assessments, the impact on threatened fauna species and ecological communities is not considered to be a significant impact as summarised below.

FAUNA

Swift Parrot (*Lathamus discolor*)

This species was not detected during survey, and only one individual has been recorded in the locality; this assessment is based on the impact to potential habitat only. By definition therefore, the site cannot be considered as supporting an important population.

The project area provides potential habitat for occasional foraging only. The loss of 0.74 ha of potential habitat within the project area represents a very small-scale loss of foraging habitat for this highly mobile species and is unlikely to result in a significant impact, noting that Swift Parrots do not breed in mainland Australia (only in Tasmania). Additionally, the potential habitat is not at the limit of the range of this species, as it is present in mainland Australia along the NSW coast, and the project area is not mapped on the NSW Important Habitat Map for the species.

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

During survey, this species was detected flying overhead within the project area.

Critical habitat elements for this species include suitable camp sites; the availability of food throughout the year and across the landscape; the availability of water; and the availability of sufficient refugia during drought and extreme heat.

The population of the Grey-headed Flying Fox that may forage over the project footprint from time to time is not considered to form an important population. No separate or distinct populations have been identified for the species due to the constant genetic exchange and movement between camps throughout the species' entire geographic range, as identified in the Species Profile and Threats Database.

The project area provides only foraging resources (mainly from late winter to summer) and water. The 0.74 ha patch of woodland to be removed within the project area comprises scattered trees with no understorey, which are unlikely to provide high quality forage due to their poor growing conditions and stunted growth. By contrast, the bushland vegetation in the retention area, and along the riparian corridor of South Creek to the east, contains an abundance of mature trees that provide high quality forage across the same seasons. Thus, while the area of available foraging habitat will be temporarily reduced, the types of resources available will remain, including the habitat of highest value.

The scale of the loss of foraging habitat is not considered likely to impose a significant impact on this highly mobile species.

Diamond Firetail (*Stagonopleura guttata*)

This species was not detected during survey, and only one individual has been recorded in the locality; this assessment is based on the impact to potential habitat only. By definition therefore, the site cannot be considered as supporting an important population.

The loss of 0.74 ha of potential habitat within the project area represents a very small-scale loss of foraging habitat for this highly mobile species and is unlikely to result in a significant impact. The bushland vegetation in the retention area, and along the riparian corridor of South Creek to the east, contains an abundance of mature trees that provide high quality forage across the same seasons. Thus, while the area of available foraging habitat will be temporarily reduced, the types of resources available will remain, including the habitat of highest value.

The scale of the loss of foraging habitat is not considered likely to impose a significant impact on this highly mobile species.

ECOLOGICAL COMMUNITIES

River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria

The impact on the Critically Endangered Ecological Community River-flat Eucalypt Forest is largely limited to areas of the TEC that have been subject to modification over a number of years, due to livestock grazing and historical agricultural land use. As a result, the understorey has historically been largely cleared. The direct impact through the removal of approximately 0.09 ha of EPBC Act listed River-flat Eucalypt Forest will marginally reduce the extent of the community, however when considered against the Significant Impact Guidelines, the impact on Riverflat Eucalypt Forest is not considered likely to be significant.

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

No

4.1.4.9 Please elaborate why you do not think your proposed action is a controlled action. *

None of the impacts on MNES are considered of a type or scale sufficient to qualify as a controlled action. This is due to a number of factors that are considered below:

- Early assessment of the ecological values of the project area and the remaining non-certified land, and subsequent identification of ecological constraints to the development footprint.
- Careful avoidance of impact by concentration of the development within bio-certified parts of the site. The losses of vegetation are therefore largely restricted to grassland that provide poor habitat for threatened species.
- Of the three fauna species that constitute MNES, only one has been recorded flying overhead the site, and the other two have only been considered due to the presence of potential habitat.
- The MNES fauna species recorded on site was the Grey-headed Flying-fox, which was recorded flying overhead and not actually in the project area. Potential impacts to this species are not considered to be significant, as the Grey-headed Flying-fox may only use the site as warm season foraging habitat and such foraging habitat is common and secure across the remainder of the bushland in the project area and the local reserves. Critical habitat elements for this species are not present (such as breeding camp sites and winter forage) and are therefore not impacted by the proposal.
- The area of impact on EPBC Act listed Riverflat Eucalypt Forest is small – approximately 0.09ha, that comprises scattered trees over a modified groundlayer.
- A range of mitigation measures will be implemented including the management of Riverflat Eucalypt Forest in the retention area. These actions will be undertaken in accordance with a VMP and will further enhance connectivity and increase habitats for fauna across the wider Project Area.

With consideration of the small areas of impact, the existing levels of disturbance in the impact areas, it is considered that the impacts of the proposed action on MNES is minor and therefore unlikely to comprise a ‘Controlled Action’ under the EPBC Act.

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. *

Impacts avoided

- Reducing the size of the output from the drainage basin in the north. Originally, this was proposed to extent into a patch of Swamp Oak Floodplain Forest, which would have caused the removal of further native vegetation, and an additional TEC.
- Channeling the outputs from the drainage basin so that they are in line with the pre-existing drainage line within the study area.
- The regional basins have been optimised and designed to fit within the allocated stormwater management areas within the Sydney Water draft infrastructure scheme. These are smaller than originally envisaged under the SEPP for the western side of the site (Badgerys Creek), thus minimising the impact on clearing of biodiversity.
- Fauna underpasses and a fauna habitat corridor have been designed to retain connectivity across the study area, and to allow the safe passage of native fauna throughout.
- A VMP is to be prepared (under SSD - 97688711) for portions of the retention areas in both the eastern and western portion of the Project Maverick site, that will enhance and rehabilitate the native vegetation that is already present

Impact Mitigation Measures

It is important to note that the proposed works that extend outside the current certified land under the Growth Centres SEPP are required to facilitate the development in accordance with the Aerotropolis Precinct Plan which is in force under Chapter 4 of the WPC SEPP. It therefore prevents any ability to mitigate on the non-certified land in order to deliver works consistent with the Precinct Plan and associated zoning as envisaged under the WPC SEPP.

Notwithstanding this our mitigation for any further impacts associated with the development are as follows:

- Delineation of clearing limits - Clearing limits marked either by high visibility tape on trees of metal/wooden pickets, fencing or an equivalent boundary marker. Disturbance, including stockpiling, restricted to clearing limits.
- Tree protection measures - Inductions to communication tree protection measures. Installation of fences around specified tree protection zones. All tree work is to be carried out by a suitably qualified and insured Arborist.
- Sedimentation control - Construction activities will be undertaken in accordance with “The Blue Book” (Landcom 2004). These include: installation of sediment control fences; covering soil stockpiles; and avoiding soil disturbance prior to heavy rainfall.
- Pathogen management - All clearing works are to be conducted in accordance with the pathogen management plan. Requirements include Establishment of wash-down area, disinfection of machinery and gear and testing of trees prior to clearance for appropriate containment measures.
- Pre-clearance survey in all areas of vegetation that are required to be cleared within one week of clearing. Habitat features will be marked during the pre-clearing survey.
- Staging of clearing - Vegetation clearing will be conducted using a two-stage clearing process. Animals disturbed or dislodged during the clearance but not injured will be assisted to move to adjacent bushland or other specified locations. If animals are injured during the vegetation clearance, appropriate steps will be taken to humanely treat the animal (either taken to the nearest veterinary clinic for treatment, or if the animal is unlikely to survive, it will be humanely euthanized).
- Weed management - Appropriate weed control activities will be undertaken in accordance with the Greater Sydney Regional Strategic Weed Management Plan 2023 – 2027.
- Vegetation Management Plan - A VMP will be prepared and will be implemented for the ongoing management, restoration and enhancement of portions of the retention area; and
- Incorporating a detailed landscape design as part of the project, that will utilise native species, from seeds that have been collected and propagated from within the Project Area (where possible).

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

The NSW Biodiversity Assessment Method (BAM) sets a standard that will result in no net loss of biodiversity values where the impacts on biodiversity values are avoided, minimised and mitigated, and all residual impacts are offset by retirement of the required number of biodiversity credits.

In addition to the avoidance and mitigation measures outlined above, residual impacts are to be offset by retirement of the required number of biodiversity credits. While the BDAR being prepared for the Masterplan is currently still in progress, assessments to date indicate an estimated credit requirement of the following:

- PCT 3320 - 16 credits, like-for-like option only, sourced from IBRA subregions Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi, and Wyong, or any IBRA subregion within100km of the outer edge of the impacted site
- PCT 3975 - 14 credits, like-for-like option only, sourced from IBRA subregions Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi, and Wyong, or any IBRA subregion within100km of the outer edge of the impacted site
- PCT 4025 - 2 credits, like-for-like option only, sourced from IBRA subregions Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi, and Wyong, or any IBRA subregion within100km of the outer edge of the impacted site

The Project proposes to satisfy the credit obligation through purchase of credits or payment into the Biodiversity Conservation Fund in accordance with the BAM.

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	Cuculus optatus	Oriental Cuckoo, Horsfield's Cuckoo
No	Yes	Gallinago hardwickii	Latham's Snipe, Japanese Snipe
Yes	Yes	Hirundapus caudacutus	White-throated Needletail
No	No	Motacilla flava	Yellow Wagtail
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? *

Yes

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

A report was generated using EPBC Protected Matters Search Tool to identify a list of migratory species and with potential to occur within the project area. Furthermore, species records held within the NSW BioNet were reviewed to identify migratory species previously recorded within a 10km radius of the project area. A likelihood of occurrence assessment was undertaken for migratory species and is provided in **Attachment E - Likelihood of Occurrence Tables**.

This analysis established that the proposal has the potential to impose an impact of some kind on two migratory fauna species. A brief summary is provided for each impacted entity below.

Latham's Snipe (*Gallinago hardwickii*)- potential indirect impact

One individual of this species was recorded in 2022 within the South Creek retention area. No potential habitat for this species will be removed from the project area, as they require dense vegetation on the edge of waterbodies, however the proposed action may have an indirect impact on the retained vegetation within the South Creek retention area immediately to the east of the project area. These are primarily edge effects such as weed incursions, light and noise.

White-throated Needletail (*Hirundapus caudacutus*) - potential direct and indirect impact

The White-throated Needletail is an almost exclusively aerial species, which may forage aerially above the project area however would not rely on habitats within the project area.

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

No

4.1.5.6 Describe why you do not consider this to be a Significant Impact. *

An assessment against the Commonwealth Significant Impact Guidelines for the migratory species previously considered as potentially occurring Is provided in **Attachment F - Significant Impact Assessments**.

As outlined within the impact assessments, the impacts on migratory fauna species are not considered to be a significant impact based on the assessment indicating the proposed action is:

- Unlikely to substantially modify, destroy or isolate an area of important habitat for the species;
- Result in an invasive species that is harmful to the migratory species becoming established in an area of important habitat for the species, or
- Seriously disrupt the lifecycle (breeding, feeding, migration or resting behaviour) of an ecologically significant proportion of the population of the species.

Suitable habitat for the Latham’s Snipe is not present within the project area and given the White-throated Needletail is almost exclusively aerial, impacts to the project area are unlikely to affect these species.

A suite of measures will be implemented to minimise potential impacts on fauna species, including migratory species.

4.1.5.7 Do you think your proposed action is a controlled action? *

No

4.1.5.9 Please elaborate why you do not think your proposed action is a controlled action. *

None of the impacts on MNES are considered of a type or scale sufficient to qualify as a controlled action. This is due to a number of factors that are considered below:

- Early assessment of the ecological values of the project area and the remaining non-certified land was undertaken to inform the design and minimise impacts on biodiversity values
- Careful avoidance of impact by concentration of the development within bio-certified parts of the Project Maverick site. The losses of vegetation are therefore largely restricted to grassland that provide poor habitat for threatened species.
- Of the two migratory fauna species that constitute MNES, only one has been recorded within the wider Project Maverick site, and the other one has only been considered due to the presence of potential foraging habitat.
- The MNES fauna species recorded on the Project Maverick site was the Latham's Snipe, which was recorded within the South Creek retention area in 2022. Potential impacts to this species are not considered to be significant, as the project area does not contain any suitable habitat for the Latham's Snipe, and so any impacts are expected to be indirect (edge effects such as weed incursions, light and noise). Critical habitat elements for this species are not present (such as vegetated wetlands) and are therefore not impacted by the proposal.
- A range of mitigation measures will be implemented including the management of better quality, suitable foraging habitat within the two retention areas. These actions will be undertaken in accordance with a VMP and will further enhance connectivity and increase habitats for fauna across the wider Project Maverick site.

With consideration of the small areas of impact, the existing levels of disturbance in the impact areas, and habitat requirements of the two potentially occurring migratory species, it is considered that the impacts of the proposed action on MNES is minor and therefore unlikely to comprise a ‘Controlled Action’ under the EPBC Act.

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

Impacts avoided

- Reducing the size of the output from the drainage basin in the north. Originally, this was proposed to extent into a patch of Swamp Oak Floodplain Forest, which would have caused the removal of further native vegetation, an additional TEC and additional potential foraging habitat for migratory species.
- Channelling the outputs from the drainage basin so that they are in line with the pre-existing drainage line within the disturbance area.
- The regional basins have been optimised and designed to fit within the allocated stormwater management areas within the Sydney Water draft infrastructure scheme. These are smaller than originally envisaged under the SEPP for the western side of the site (Badgerys Creek), thus minimising the impact on clearing of biodiversity.
- A VMP is to be prepared (under SSD - 97688711) for portions of the retention areas in both the eastern and western portion of the Project Maverick site, that will enhance and rehabilitate the native vegetation that is already present

Impact Mitigation Measures

It is important to note that the proposed works that extend outside the current certified land under the Growth Centres SEPP are required to facilitate the development in accordance with the Aerotropolis Precinct Plan which is in force under Chapter 4 of the WPC SEPP. It therefore prevents any ability to mitigate on the non-certified land in order to deliver works consistent with the Precinct Plan and associated zoning as envisaged under the WPC SEPP.

Notwithstanding this our mitigation for any further impacts associated with the development are as follows:

- Timing of clearing - timing should aim to align with migration patterns and be undertaken when migratory species are not present or considered to be in low numbers.
- Pre-clearance survey in all areas of vegetation that are required to be cleared within one week of clearing. Habitat features will be marked during the pre-clearing survey.
- Staging of clearing - Vegetation clearing will be conducted using a two-stage clearing process. Animals disturbed or dislodged during the clearance but not injured will be assisted to move to adjacent bushland or other specified locations. If animals are injured during the vegetation clearance, appropriate steps will be taken to humanely treat the animal (either taken to the nearest veterinary clinic for treatment, or if the animal is unlikely to survive, it will be humanely euthanized).

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

The NSW Biodiversity Assessment Method (BAM) sets a standard that will result in no net loss of biodiversity values where the impacts on biodiversity values are avoided, minimised and mitigated, and all residual impacts are offset by retirement of the required number of biodiversity credits.

In addition to the avoidance and mitigation measures outlined above, residual impacts are to be offset by retirement of the required number of biodiversity credits. While the BDAR being prepared for the Masterplan is currently still in progress, assessments to date indicate an estimated credit requirement of the following:

- PCT 3320 - 16 credits, like-for-like option only, sourced from IBRA subregions Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi, and Wyong, or any IBRA subregion within100km of the outer edge of the impacted site
- PCT 3975 - 14 credits, like-for-like option only, sourced from IBRA subregions Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi, and Wyong, or any IBRA subregion within100km of the outer edge of the impacted site
- PCT 4025 - 2 credits, like-for-like option only, sourced from IBRA subregions Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi, and Wyong, or any IBRA subregion within100km of the outer edge of the impacted site

The Project proposes to satisfy the credit obligation through purchase of credits or payment into the Biodiversity Conservation Fund in accordance with the BAM.

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. *

No nuclear facilities occur on or near the project area.

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. *

No marine areas occur on or near the project 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 near the Great Barrier Reef and the actions proposed will not exacerbate threats to 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. *

This is a commercial development within Western Sydney;
it is not related to a coal mining development or coal seam gas exploration or extraction.

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.

Direct impact	Indirect impact	Commonwealth land area
No	Yes	Sydney Airport

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

Yes

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

The proposed action is related to the **Western Sydney International Airport** Commonwealth Lands, rather than the Sydney Airport listed above. The Western Sydney International Airport is not available as an option on the portal.

The Project Maverick site is located immediately to the east of the Western Sydney International Airport (WSIA), which is listed in the PMST report as Commonwealth Land (see **Attachment A - Figure 7**). Badgery's Creek, and its subsequent riparian corridor, runs along the western boundary of the Project Maverick site, and separates the WSIA from the Project Maverick site.

The proposed action will not have a direct impact on the WSIA, as no works will be undertaken outside of the disturbance area footprint. Additionally, the riparian corridor of Badgery's Creek will remain as is, and will provide a natural barrier between the Project Maverick site and the WSIA.

The proposed action has the potential to cause the following indirect impacts on the WSIA:

- Inadvertent impacts on adjacent habitat or vegetation within the WSIA due to increased human activity during construction has the potential to disturb fauna within adjacent habitat areas. The resulting impacts to fauna may include heightened vigilance and predator avoidance, which can disrupt foraging and roosting efficiency or deter wildlife from using particular areas. The civil works is likely to result in a temporary and minor permanent impact to ecological values due to increased human presence on site during the construction period.
- Reduced viability of adjacent habitat in the WSIA due to noise, dust or light spill. Construction noise is expected to elicit some avoidance response from fauna using the surrounding vegetation though, with consideration of the extent of habitat available in the retention area and surrounds, this is likely to be a temporary and negligible to minor impact. Artificial light from buildings may affect nocturnal and diurnal animals by disrupting patterns, with quality of light (e.g. wave length and colour), intensity and duration potentially evoking different responses. Impacts from increased light levels include disorientation from or attraction toward artificial sources of light; mortality from collisions with structures; and effects on light- sensitive cycles of species (e.g. breeding and migration for fauna and flowering in plants). The presence and intensity of artificial light will have most impact at the edge of adjacent vegetation communities. Furthermore, the civil works is likely to result in a negligible impact to wildlife due to the buffers proposed.

Habitat will be further fragmented between the WSIA and the eastern retention area due to the removal of patches of scattered trees within the disturbance area, however connectivity will be restored in the long-term through landscaping and the creation of fauna underpasses.

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

No

4.1.10.6 Describe why you do not consider this to be a Significant Impact. *

The proposed action will not have a direct impact on the WSIA, and the indirect impacts are expected to be minor.

The proposed action will clear native vegetation and remove habitat for threatened fauna species within the disturbance area of the Project Maverick site, however the riparian corridor of Badgery's Creek is due to be retained. This riparian corridor acts as a buffer between the Project Maverick site and the WSIA, and provides more suitable habitat for threatened fauna species than the vegetation to be removed. The vegetation to be removed is largely bio-certified under the Growth Centres SEPP mapping (see **Attachment A – Figure 2**), and largely consists of patches of native scattered trees over a ground layer of exotic dominated species. The quality of vegetation to be removed is much poorer than the vegetation to be retained in the Badgery's Creek and South Creek retention areas, and so it is unlikely that threatened fauna or migratory species would solely rely on this vegetation for foraging or for breeding.

The removal of vegetation within the disturbance footprint will increase fragmentation between the WSIA and the South Creek retention area in the east, however this will only be a short-term impact. The existing habitat is already fragmented, and consists of small patches of scattered trees over a largely cleared understorey. Currently, only highly aerial fauna species would be able to use the Project Maverick site as 'stepping stone habitat' between the WSIA to the east, however the project proposes to create a more connected tree canopy through landscaping for aerial species and for tree-dwelling fauna species (such as possums and gliders), as well as the establishment of fauna underpasses for reptiles and ground-dwelling mammals. Therefore, the fragmentation of habitat will only be short term, and the connectivity between the WSIA and the South Creek retention area is expected to improve in the long term.

4.1.10.7 Do you think your proposed action is a controlled action? *

No

4.1.10.9 Please elaborate why you do not think your proposed action is a controlled action. *

None of the impacts on Commonwealth Land are considered of a type or scale sufficient to qualify as a controlled action. This is due to a number of factors that are considered below:

- Careful avoidance of impact to the riparian corridor of Badgery's Creek, which separates the Project Maverick site from the WSIA, despite this land being bio-certified. This retention area will provide both foraging and breeding habitat for threatened fauna species, and is proposed to be managed under a VMP to further improve the condition.
- According to the NSW BioNet Atlas, only one threatened flora species has been recorded within the WSIA - *Pultenaea parviflora (*Sydney Bush-pea*)*. The known population of this species within the WSIA is over a kilometre from the western boundary of the Project Maverick site, and the proposed action will have no impact as there will be strict mitigation measures in place for the project (as described in Section 4.1.10.10 below).
- Two threatened fauna species have been recorded within the WSIA, the Regent Honeyeater and the Grey-headed Flying Fox. These are both highly mobile species capable of accessing habitat within a wider locality. As impacts from the project are limited to short term indirect impacts, and no direct impacts are proposed on Commonwealth Land, the proposed action is considered unlikely to result in a significant impact on any known or potentially occurring threatened fauna species.
- A range of mitigation measures will be implemented including the management of native vegetation in the Badgery's Creek retention area, which will act as a buffer between the project and the WSIA and minimise potential indirect impacts. These actions will be undertaken in accordance with a VMP and will further enhance connectivity and increase habitats for fauna across the wider Project Maverick site.

As such, the potential indirect impacts of the proposed action on Commonwealth Land are considered to be minor and therefore unlikely to comprise a ‘Controlled Action’ under the EPBC Act.

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

IImpacts avoided

- The WSIA has been avoided, with a 10.59ha buffer comprising the Badgery's Creek Retention Area separating the WSIA from the Project Maverick site.

Impact Mitigation Measures

It is important to note that the proposed works that extend outside the current certified land under the Growth Centres SEPP are required to facilitate the development in accordance with the Aerotropolis Precinct Plan which is in force under Chapter 4 of the WPC SEPP. It therefore prevents any ability to mitigate on the non-certified land in order to deliver works consistent with the Precinct Plan and associated zoning as envisaged under the WPC SEPP.

Notwithstanding this our mitigation for any further impacts associated with the development are as follows:

- Delineation of clearing limits - Clearing limits marked either by high visibility tape on trees of metal/wooden pickets, fencing or an equivalent boundary marker. Disturbance, including stockpiling, restricted to clearing limits.
- Tree protection measures - Inductions to communication tree protection measures. Installation of fences around specified tree protection zones. All tree work is to be carried out by a suitably qualified and insured Arborist.
- Fauna underpasses and a fauna habitat corridor have been designed to retain connectivity across the Project Maverick site, and to allow the safe passage of native fauna throughout. This, combined with the landscape plan for the project, will increase connectivity for aerial species, arboreal species and terrestrial species between the WSIA, the Project Maverick site and beyond.
- Sedimentation control - Construction activities will be undertaken in accordance with “The Blue Book” (Landcom 2004). These include: installation of sediment control fences; covering soil stockpiles; and avoiding soil disturbance prior to heavy rainfall.
- Pathogen management - All clearing works are to be conducted in accordance with the pathogen management plan. Requirements include Establishment of wash-down area, disinfection of machinery and gear and testing of trees prior to clearance for appropriate containment measures.
- Weed management - Appropriate weed control activities will be undertaken in accordance with the Greater Sydney Regional Strategic Weed Management Plan 2023 – 2027.
- Vegetation Management Plan - A VMP will be prepared and will be implemented for the ongoing management, restoration and enhancement of the retention areas.

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

There are no proposed offsets specific to 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.

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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 is within the Sydney urban area.

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:

None

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)
- Threatened Species and Ecological Communities (S18)
- 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. *

There are no feasible alternatives for the proposed action. The project is designed in accordance with the Western Sydney Aerotropolis Precinct Plan (WSAP) and associated Development Control Plan. The SSDA supports the essential site preparation works to rehabilitate the area disturbed by quarrying and brick making operations and establish the landform that can support the delivery of employment and warehousing floorspace as well as landscape and amenity space. This will allow the disturbance area to realise the objectives of the Enterprise zone and create an industrial precinct in accordance with the WSAP. Additionally, Goodman have limited / no ability to amend the Precinct Plan structure as it outlines the road, developable area, Sydney Water Stormwater infrastructure and other associated requirements the developer must deliver.

Overall, the most ecologically significant areas of the Project Maverick site have been avoided, and these will be enhanced and rehabilitated under a VMP to improve the quality of the vegetation and species habitat present in both retention areas. A range of mitigation measures will be implemented to minimise impacts on biodiversity values, and to provide ongoing management of native vegetation and habitat for native fauna species. The following mitigation measures will be implemented to minimise any adverse effects of the project on biodiversity:

- Demarcations of clearing limits
- Vegetation clearance and fauna management protocols
- Vegetation management under a VMP, including weed management and revegetation

In addition to these measures, inductions for contractors and visitors are proposed to address the locations of sensitive flora and fauna and outline their roles and responsibilities for the protection and/or minimisation of impacts to biodiversity values.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figures	03/02/2026	No	High

3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figures	03/02/2026		High

3.1.2 Existing or proposed uses for the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figures	03/02/2026		High

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

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figures	03/02/2026		High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment C - Project Maverick Species List.pdf List of flora and fauna species recorded in the Project Maverick site during field surveys	03/02/2026	No	High

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figures	03/02/2026		High

3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment D - Groundwater Assessment Report.pdf Project Maverick Groundwater Assessment Report	18/12/2025	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 E - Likelihood of Occurrence Tables.pdf Likelihood of occurrence of threatened fauna, flora and migratory species occurring within the project area	03/02/2026	No	High

4.1.4.6 (Threatened Species and Ecological Communities) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment F - Significant Impact Criteria.pdf Assessments against the Significant Impact Criteria for MNES within the project area	03/02/2026	No	High

4.1.5.2 (Migratory Species) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment E - Likelihood of Occurrence Tables.pdf Likelihood of occurrence of threatened fauna, flora and migratory species occurring within the project area	03/02/2026		High

4.1.5.6 (Migratory Species) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment F - Significant Impact Criteria.pdf Assessments against the Significant Impact Criteria for MNES within the project area	03/02/2026		High

4.1.10.2 (Commonwealth Land) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figures	03/02/2026		High

4.1.10.6 (Commonwealth Land) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figures	03/02/2026		High

5.2 Declarations

Completed Referring party's declaration

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

ABN/ACN	29001584612
Organisation name	SLR CONSULTING AUSTRALIA PTY LTD
Organisation address	2060 NSW
Representative's name	Alix Murray
Representative's job title	Senior Ecologist
Phone	0438377898
Email	alix.murray@slrconsulting.com
Address	4/79-81 Hannan Street

☑ 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, **Alix Murray of SLR CONSULTING AUSTRALIA 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	40088981793
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 Australia

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

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

☑ 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. *

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, **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. *

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.