

Goodman  
The Hayesbery, 1 11 Hayes Road  
Rosebery NSW 2018

**Attn:** Caitlin D'Arcy

**CC:** Guy Smith, Lachlan O'Reilly

6 June 2023

Dear Caitlin,

## Roussell Road Warehouse and Distribution Centre (SSD-41807966)

I understand that Blacktown Council has amended their informal comments (provided by the Department in email dated 24 May 2023) in response to the information provided on 27 May 2023 (enclosed).

The amended informal comments provided by Council (now dated 01 June 2023) do not appear to have taken into consideration the planning and approval history of the subject site, despite providing this information.

The following response is provided:

| Council amended informal comment 01/06/2023                                                                                                                                                                                                                                                                                                                    | Response 05/06/2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <p>The applicant has made very minor refinements to the architectural plans and access route following Council comments.</p> <p>The applicant has been able to show that the riparian distances for the 3rd order stream 'Reedy Creek' are met by top of bank modelling and that the riparian zone widths required under the Water Management Act are met.</p> | <p>Noted</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>Natural Areas is of the opinion that the proposed building should be reduced in size and that an increased setback distance to Reedy Creek be provided to enable:</p> <ul style="list-style-type: none"> <li>Greater avoidance of impacts to threatened ecological community PCT 1800;</li> </ul>                                                           | <p><i>C. glauca</i> in the development footprint has been allocated to PCT 1800, as a best fit in the Bionet Vegetation Classification database (as required by the BAM); and should not be misinterpreted as representing the naturally occurring community.</p> <p>PCT 1800 in the footprint is dominated by clonal juvenile to semi-mature <i>Casuarina glauca</i>.</p> <p><i>C. glauca</i> is known to colonise disturbed sites and capable of forming dense and monotypic stands under which almost no other plant species is able to grow.</p> <p>Its natural habitat is forested wetlands found along or near streams. The constructed development pad does not provide natural habitat for PCT 1800 or <i>C. glauca</i>.</p> <p>Outside of natural habitat, <i>C. glauca</i> is capable of altering light, temperature, and soil chemistry regimes of various</p> |

| Council amended informal comment 01/06/2023                                                                                                                                                                                                                                                               | Response 05/06/2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|                                                                                                                                                                                                                                                                                                           | <p>habitats; which in turn serves to displace other native species.</p> <p><i>C. glauca</i> has encroached without obstacle onto the subject land in a similar nature to that of introduced weed and grass understorey. This has resulted from:</p> <ul style="list-style-type: none"> <li>• A long delay in developing the western section of the lot following earthworks; and</li> <li>• A lack of maintenance since the initial pad earthworks to create a suitable industrial facility pad.</li> </ul>                                                                                                                                                                                                                                         |
| <ul style="list-style-type: none"> <li>• A wider riparian fauna corridor which provides connections to vegetated areas to the south, east and north of the subject land, including eastwards and northwards to Eastern Creek. This is an important biodiversity corridor in the Blacktown LGA;</li> </ul> | <p>The existing riparian buffer zone is already significantly greater than the responding 30m setback required under the current DPE 2022 guidelines.</p> <p>Approximately 2/3 of the eastern riparian buffer zone provides an average 50m width, with the remaining third between 115m and maximum 150m wide.</p> <p>With the western riparian buffer zone the combined corridor widths provide a continuous riparian and ‘fauna’ corridor width of 137-240m wide (not including the large bioretention basin and associated landscaping due west, which provides additional fauna habitat).</p> <p>This provides a viable biodiversity corridor with similar dimensions to that provided in the Western Sydney Parkland’s riparian corridors.</p> |
| <ul style="list-style-type: none"> <li>• Reduced light spill from the proposed building to nocturnal mammals and birds that could potentially use the adjacent vegetation of the Reedy Creek corridor for breeding, roosting and foraging;</li> </ul>                                                     | <p>As described in the Section 7.2.3 of the BDAR, the proposal may potentially increase noise levels during construction and both noise and light levels during the operational stage.</p> <p>It is considered that the proposal will not result in significant additional noise and light impacts to local fauna as the surrounds include a main arterial and local road network and industrial development.</p> <p>The subject site does not provide any habitat important to any threatened species and any resident fauna would already be accustomed to the urbanised environment. The likelihood of a significant impact from noise and light is considered unlikely.</p>                                                                     |
| <ul style="list-style-type: none"> <li>• Increased areas for amelioration to deep soil zones and re-establishing native vegetation on site to assist with water percolation and stormwater loads into adjacent TECs and creeklines;</li> </ul>                                                            | <p>As evidenced in photo plates 9-10 of the BDAR, the substrate within the subject land no longer represents a natural soil landscape. Instead, it is heavily compacted with construction gravel evident which lacks a suitable A horizon soil for plant growth.</p> <p>It is unreasonable to expect the Applicant to disturb the existing pad to provide deep soil zones other than what is required for landscaping areas.</p> <p>Stormwater will be managed through management measures that comply with the SEARs and DCP requirements</p>                                                                                                                                                                                                      |

| Council amended informal comment 01/06/2023                                                                                                                                                                     | Response 05/06/2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <ul style="list-style-type: none"> <li>Decreased proportions of hardscaped surfaces on site which contribute to heat island effects, poor outcomes for amenity, landscaping, biodiversity and shade.</li> </ul> | <p>These factors have been accounted for in the masterplan for the M7 Industrial Hub, which includes riparian zone of Reedy Creek.</p> <p>The riparian zone and site landscaping will mitigate against these factors. The site landscaping has addressed the key objectives of the NSW Greener Places &amp; Urban Tree Canopy Guidelines and relevant Council DCP requirements).</p> <p>Further, it is noted that 13.7% of the site includes canopy cover which assists in reducing heat island effect.</p>                                                                                                        |
| <ul style="list-style-type: none"> <li>The new development also requires a new or updated VMP to protect and restore for 10 years following impacts of this new development.</li> </ul>                         | <p>This is not considered a necessary or reasonable request.</p> <p>Large bare/degraded areas of the riparian corridor were restored at a cost of \$800,000 through:</p> <ul style="list-style-type: none"> <li>Scalping to remove weed infested soils</li> <li>Topsoiling and deep ripping</li> <li>Spread of cleared native biomass, and</li> <li>Planting with native tubestock</li> </ul> <p>The riparian corridor will be protected from development impacts through mitigation measures specified in a Flora and Fauna Management Plan (FFMP) as a subplan to the CEMP, which is considered appropriate.</p> |

Yours faithfully

*K Duchatel*

**Kat Duchatel**

BSc. Env. CEnvP EIANZ #691

BAM Accreditation No. BAAS17054