

Goodman
The Hayesbery, 1 11 Hayes Road
Rosebery NSW 2018

Attn: Caitlin D'Arcy

CC: Guy Smith, Lachlan O'Reilly

27 May 2023

Dear Caitlyn,

Roussell Road Warehouse and Distribution Centre (SSD-41807966)

Please find enclosed a response to Blacktown Council's informal comments (emailed 24.05.23) on the draft RTS package as they relate to biodiversity.

Comment	Response
The applicant has made very minor refinements to the architectural plans and access route following Council comments. Natural Areas concludes that a design change is needed to re-site the proposed building further from Reedy Creek. Top of bank modelling as was previously requested, has not been provided in the response and the proposal currently encroaches into the 30 m required riparian area for a 3rd order creek line (see Fig 2-1 of the BDAR).	The proposal does not encroach into the 30m required riparian area for a 3rd order stream. The inaccuracy of the hydro-line mapping used in Figure 2-1 was explained in the RTS v.1 and the BDAR Figure 2-1 since amended to show the correct alignment of Reedy Creek (see Figure 1 below):  Figure 1. Extract from BDAR figure 2-1 The Approved Boundary Definition Plan was also provided in Appendix D of the BDAR, which shows a 50m and 40m width from the surveyed top of bank and the adopted Reedy Creek lot boundary. This diagram has been notated for ease of reading and provided in Figure 2.



Figure 2. Boundary Definition Plan

Comment	Response
Increasing the separation of the proposal from the riparian corridor would also enable avoidance of impacts to the threatened ecological community PCT 1800, particularly that located within the riparian buffer for Reedy Creek. It would help to reduce direct and indirect impacts on this TEC and associated habitat for native and threatened species. It would reduce light spill to nocturnal bats and birds that could potentially use the adjacent vegetation for breeding, roosting and/or foraging. The subject land provides connections to vegetated areas to the south, east and north of the subject land, including eastwards and northwards to Eastern Creek. The riparian corridor is thus important to fauna movements as well.	The protection of the riparian corridor was considered in the planning and definition boundaries adopted (as shown in Figure 2). This has resulted in a much wider vegetated riparian zone than required under the WM Act. PCT 1800 within the Reedy Creek riparian zone has been substantially increased in extent (albeit this PCT did not exist at the time and the VMP reinstated river-flat eucalypt forest) in poor condition has encroached from established within the subject site due to: • A long delay in developing the western section of the lot; and • A lack of maintenance between clearing and earthworks (including fill) to establish a levelly formed pad for industrial development, as shown in aerial photograph below: The aerial photograph shows a large, rectangular, light-colored industrial pad situated next to a dark, vegetated riparian corridor. The pad appears to be a cleared area with some structures or equipment visible. The surrounding area includes more vegetation and some other industrial buildings in the distance. Above: finished industrial pad (2009) The development will increase light spill above that which currently exists, however this was always going to be an outcome of the Precinct's planning and provisions made for the riparian corridor. The potential indirect impact of light spill was accepted by the consent authority to not represent a significant impact. This due to the surrounding arterial and local road networks and industrial development (see appended location photographs). The development does not directly impact on the riparian corridor, which has been substantially improved through the implementation of the Precinct's VMP. The eastern riparian zone adjacent to the development provides a minimum width of 45m and maximum width of 150m, which is substantially above and beyond current approval conditions (see Figure 3).

Comment	Response
With no additional bio-basin proposed on site for this proposal, a greater setback to the creek as suggested would also increase deep soil zones and potential for native vegetation areas to assist with water percolation and reduce hardstand stormwater loads into adjacent TECs and creek lines.	The existing bio-basin was designed and constructed compliantly with the approved stormwater system for the masterplan area (to cater for the subject expansion development site area for both OSD and water quality). A greater than the existing 50m setback to the creek will not increase deep soil zones because the expansion area has already been subject to earthworks (cut and fill) to provide a level construction pad suitable for its intended industrial development. Photo plates provided in the BDAR show the compacted soils and overlying road base, which do not provide a suitable environment for natural regeneration or water percolation as suggested.
The proposal as it stands, results in a significant proportion of the site as hardscaped surface. This has poor outcomes for quality of landscaping, biodiversity, shade and heat island effects.	The proposed landscaping has addressed the key objectives of the NSW Greener Places & Urban Tree Canopy Guidelines and relevant Council DCP requirements.
The response indicated that a fully costed Vegetation Management Plan has already been implemented compliantly for the CCA major development including the conservation and restoration of a riparian corridor either side of Reedy Creek. This new development requires a new or updated VMP to protect and restore for 10 years following impacts of this new development.	The riparian corridor will not be directly impacted by the additional development of this site The potential for indirect impacts on the riparian corridor will be avoided through the implementation of, and strict adherence to, the project CEMP and specialist CEMP subplans. The new development is not located on waterfront land and does not trigger consideration under the WM Act (see Figure 4). The land including the riparian corridor will remain in private ownership by Goodman. Goodman may consider the creation of a Biodiversity Stewardship site on this land in the future but at present is not opting to do so.

Yours faithfully

K Duchatel

Kat Duchatel

BSc. Env. CEnvP EIANZ #691

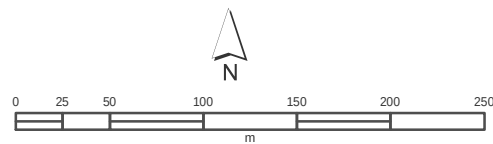
BAM Accreditation No. BAAS17054

Encl: Figures 3 & 4



Legend

- Subject_land
- Reedy_Creek
- Waterfront_land



Roussell Road Warehouse SSD 41807966

Figure 3. Waterfront land

Coordinate system: MGA Zone 56 (GDA 2020)

Image source: Nearmap 29 November 2022

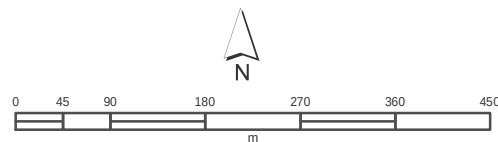
Date created: 27 Mary 2023

écologique



Legend

-  Subject_land
-  Reedy Creek riparian lot
-  Reedy_Creek



Roussell Road Warehouse SSD 41807966

Figure 4. VMP implementation

Coordinate system: MGA Zone 56 (GDA 2020)

Image source: Nearmap 29 November 2022

Date created: 27 Mary 2023