



BDAR Waiver Request

Project Marvel – 20 Kelso Crescent, Moorebank

Mapletree SR Australia Management Pty Ltd

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Prepared by:

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SLR Project No.: 630.V14671

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Revision Record

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2.0	26 September 2025	Jordan Peppin Elise Newberry	Fiona Iolini	Joshua Drane

Basis of Report

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Mapletree SR Australia Management Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

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1.0 Introduction

Mapletree SR Australia Management Pty Ltd (Mapletree) is proposing to develop a warehouse and distribution centre with ancillary office space at 20 Kelso Crescent, Moorebank (hereafter 'subject land'). The subject land is located within the Liverpool local government area (LGA) and forms part of an established industrial precinct in Moorebank.

The proposed development is a State Significant Development (SSD) (SSD-589784472) and involves the construction of two separate two-storey warehouses, a central hardstand area and internal vehicle access. The total gross floor area of the proposed warehouses is approximately 33,700 m².

The subject land is zoned as E4 – General Industrial under the Liverpool Local Environmental Plan (LEP) 2008. The site currently comprises a concrete hardstand and is largely cleared of remnant native vegetation, with the exception of planted native vegetation and introduced species.

1.1 Background

In June 2023, Planning Secretary's Environmental Assessment Requirements (SEARs) were received. These included the requirement for the assessment of any biodiversity impacts associated with the development to be prepared in accordance with the *Biodiversity Conservation Act* 2016 (BC Act) and the Biodiversity Assessment Method 2020. The subject land is not biodiversity-certified land and contains limited biodiversity values. As such, the proponent is seeking to waive the requirements for the preparation of a Biodiversity Development Assessment Report (BDAR).

The following sections specifically address the information requirements outlined in the Department of Planning Industry and Environment (DPIE) (2019) guidelines "*How to apply for a Biodiversity Development Assessment Report Waiver for a Major Project Application*" (the 'BDAR waiver guidelines').

A BDAR Waiver was prepared by SLR Consulting Australia Pty Ltd (SLR) and submitted in support of the Environmental Impact Statement (EIS) in 2023. The Environment and Heritage Group delegate of the Secretary of the Department of Planning and Environment (DPE) considered the BDAR waiver and was satisfied the proposed development was not likely to have any significant impact on biodiversity values. Accordingly, the delegate granted the BDAR waiver in a letter dated 29 September 2023.

On 4 August 2025, Mapletree submitted a request to amend the proposed building design and layout of the existing SSD application to the DPE. The request was approved by DPE on 6 August 2025, with DPE requesting an Amendment Report to incorporate the revised design. As such, this BDAR Waiver is intended to assess biodiversity impacts associated with the amended development design.



2.0 Site Particulars

2.1 Terminology and Definitions

Site particulars and terminology used throughout this report are defined in Table 1 below.

Table 1: Site Particulars, Terminology and Definitions

Term	Definition
Subject land	Lot 1 in DP 1296586
Development site	Lot 1 in DP 1296586 The development site is the same as the subject land for the purposes of this report
Address of subject land	20 Kelso Crescent, Moorebank, 2170
Local government area	Liverpool
Land Zoning	'E4 – General Industrial'
IBRA region/subregion	Sydney Basin Bioregion / Cumberland Subregion

2.2 Administration Information

The BDAR waiver request requirements for administration are addressed in Table 2 below.

Table 2: Project Administration Information

Information Requirement	Project Information
Proponent name and contact details	- Mapletree SR Australia Management Pty Ltd - Suite 1, Level 9, 580 George Street, Sydney, 2000, NSW - Project contact: Tan Eng Khoon, mobile +61 478 224 778
Project ID (Information to identify which SSD or SSI project the request relates to and where the project is up to in the assessment process).	- SSD-58978472 - Kelso Crescent Multi Level Warehouse, Moorebank 20 Kelso Crescent within Liverpool City - SEARs issued 8 June 2023 - EIS submitted 23 April 2024 - Application for the amendment of SSD application (SSDA) requested on the 4 August 2025 - SSDA Amendment approved 6 August 2025
Name and ecological qualifications of person completing Table 2	Jordan Peppin - Bachelor of Science (Ecology), UNSW 2018 - Bachelor of Arts (Environmental Humanities), UNSW 2018 - BAM Assessor Accreditation BAAS25018 Elise Newberry - Bachelor of Environmental Biotechnology, UTS 2023



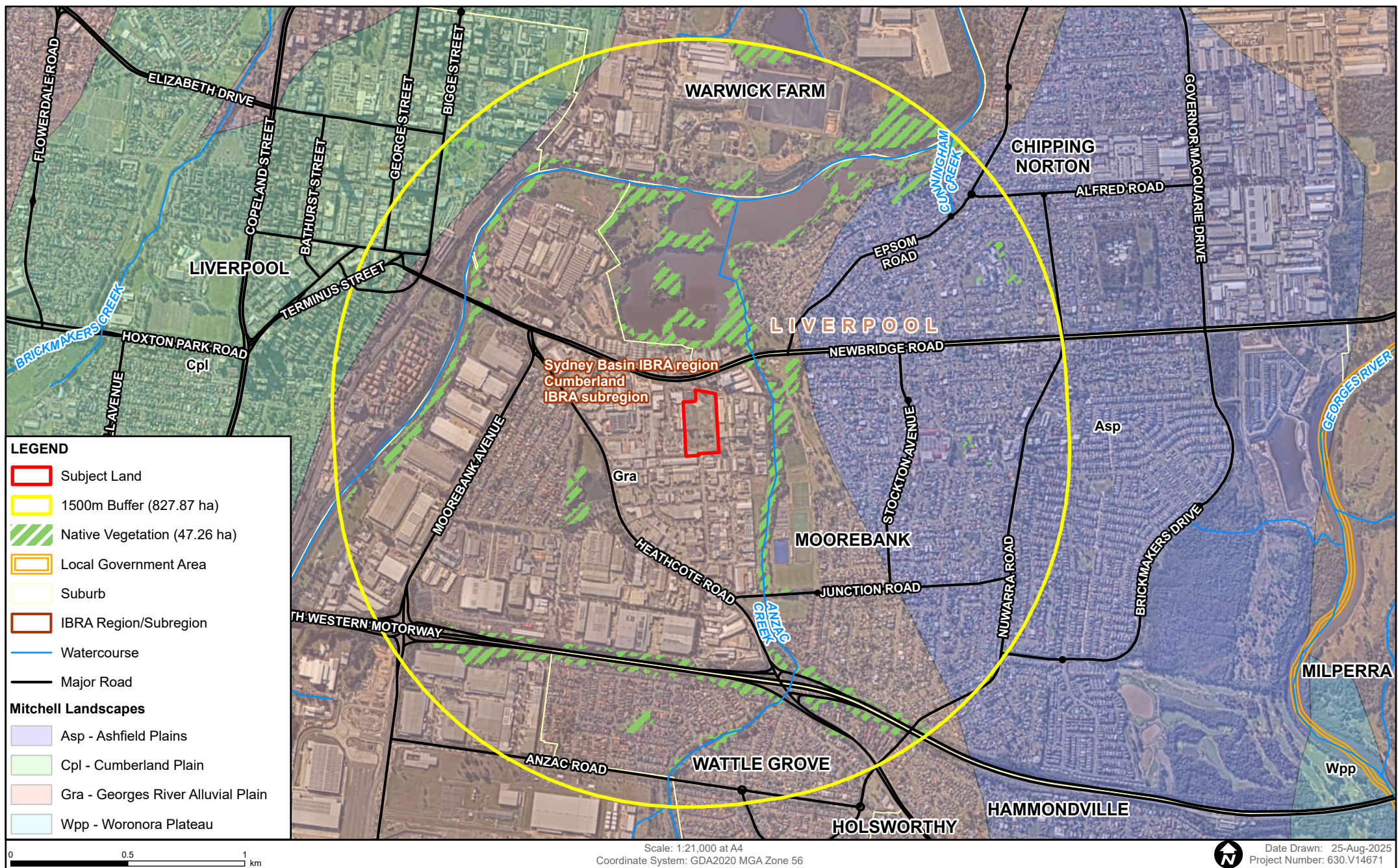
2.3 Site Details

The BDAR waiver request requirements for site details are addressed in Table 3 below.

Table 3: Site Details

Information Requirement	Project Information
Street address, Lot and DP, local government area	The subject land is located in the suburb of Moorebank, within the Liverpool LGA. The address of subject land is 20 Kelso Crescent, Moorebank, NSW 2170. The subject land comprises the following lot and deposited plan: • Lot 1 in DP1296586
Description of existing development site, i.e., the area of land that is subject to the proposed development application. If any part of the land is considered 'Category 1 – exempt land' information must be provided to demonstrate how the land meets the criteria that applies to Category 1 – exempt land.	The subject land is located within an existing industrial precinct. Both the subject land and adjoining properties have undergone historic clearing and development (see historic aerial imagery in Appendix A). The site covers an area of 35,192 m² and has an irregular shape, with frontage to Kelso Crescent to the north and Seton Road to the south. Access to the site is available from both Kelso Crescent and Seton Road. The land is predominantly cleared with most buildings and structures removed. However, multiple landscaped gardens are present across the site and subterranean fuel tanks remaining. The site previously accommodated storage buildings and external storage areas, which have since been demolished and removed. The subject land is situated within the Sydney metropolitan area and is zoned 'E4 General Industrial' and 'CA Complex Area'. As such the subject land cannot qualify as 'Category 1 – exempt land' under the <i>Local Land Services Act 1993</i>.
Location map showing the development site in the context of surrounding areas and landscape features. Satellite image of site in context of adjoining sites.	See Figure 1
Site Map (to scale, ideally as a spatial shapefile).	See Figure 2







0 50 100 m

Scale: 1:2,500 at A4
Coordinate System: GDA2020 MGA Zone 56

Data source: NSW SS
Aerial imagery supplied by Neamap (June 2025)

North Arrow

Date Drawn: 25-Aug-2025
Project Number: 630.V14671

3.0 Proposed Development

The BDAR waiver guidelines require “*Project Description providing enough information to enable an understanding of the nature and scale of the proposed development and any associated activities (including construction etc.)*” (DPIE, 2019).

The proposed SSD Application seeks approval for the construction and operation of two warehouse buildings with 8 tenancies and distribution centre, including:

- Demolition and removal of all existing buildings and structures, including subterranean fuel tanks
- Site preparation works, including the removal of 31 trees
- Earthworks to achieve proposed site levels
- Provision of infrastructure comprising civil works and utilities servicing
- Construction of eight (8) warehouse buildings, split over two (2) storeys with ramp-up access, comprising:
- Construction of two (2) warehouse buildings with eight (8) tenancies, split over two (2) storeys with ramp-up access, comprising:
 - Warehouse 1a, 1b, 2a and 2c at ground level
 - Warehouse 3a, 3b, 3c and 3d at first level
 - Total Warehousing – approximately 33,700 m²
- Ancillary office accommodation totalling 1,700 m²
- On grade car parking around the subject land and undercover parking off Seton Road, and loading docks across the two (2) storeys of warehousing
- Onsite cycle parking and end of trip facility
- Complementary landscaping and offset planting, providing 11% coverage
- Signage, including entry, business identification and wayfinding signage
- Diversion of overhead electricity transmission lines at the western and southern boundaries to new subterranean channels
- Allowance for operations up to 24 hours per day, seven (7) days per week

See Appendix B for proposed development plans.



4.0 Assessment of Impacts

4.1 Overview

The subject land is not mapped by the Biodiversity Values Map and Threshold Tool (NSW DCCEE 2025b) as containing biodiversity values. Regional-scale mapping (NSW DCCEE 2025a) indicates that there are no native vegetation communities (or Plant Community Types, 'PCTs') within the subject land or immediately adjoining properties.

An ecological site inspection was undertaken by SLR ecologist Vander Bertoldo on 19 August 2025, confirming that no native vegetation or PCTs are present on the subject land. The vegetation primarily consists of planted trees and weeds.

The Arboricultural Impact Assessment Report (AIA) (Urban Arbor 2025) identifies a total of 40 trees on the subject land, of which nine are proposed for retention. The tree species identified in the AIA include:

- Thirteen species that are native to NSW including *Angophora costata*, *Brachychiton acerifolius*, *Callistemon viminalis*, *Corymbia maculata*, *Eucalyptus nicholii*, *Eucalyptus saligna*, *Eucalyptus tereticornis*, *Leptospermum petersonii*, *Melaleuca linariifolia*, *Melaleuca quinquenervia*, *Melia azedarach*, *Pittosporum undulatum* and two unidentified *Eucalyptus* spp.
- One species that is non-native to NSW, being *Corymbia ficifolia*
- Seven exotic tree species *Albizia* sp., *Cotoneaster* sp., *Ligustrum lucidum*, *Prunus* sp., *Pyrus* sp., *Schinus molle* and *Thuja orientalis*

These species were verified during the ecology site inspection on 19 August 2025, with the exception of one *Eucalyptus saligna* (Tree 17 in AIA), which was not present. The proposal will require the removal of 31 trees due to their location within the development footprint.

Additional species recorded during the site inspection were predominantly exotic and occurred in the ground or shrub layer. These include:

- Herbaceous annual or short-lived perennial weeds such as *Sonchus oleraceus* (Common Sowthistle), *Taraxacum* sp. (Dandelion), *Bidens Pilosa* (Cobblers Pegs), *Cerastium glomeratum* (Mouse-ear Chickweed), *Senecio madagascariensis* (Fireweed), *Medicago polymorpha* (Burr Medic), *Plantago lanceolata* (Lamb's Tongues), *Verbena bonariensis* (Purpletop), *Foeniculum vulgare* (Fennel) and *Brassica fruticulosa* (Twiggy Turnip) and *Conyza bonariensis* (Flaxleaf Fleabane).
- Annual or perennial exotic grasses: *Bromus* spp. (Bromes), *Setaria parviflora* (Slender Pigeon Grass), *Setaria pumila* (Pale Pigeon Grass), *Melinis repens* (Red Natal Grass), *Briza maxima* (Quaking Grass), *Eragrotis curvula* (African Lovegrass), *Avena fatua* (Wild Oats) and *Stenotaphrum secundatum* (Buffalo Grass).
- Other problematic environmental weeds: *Cardiospermum grandiflorum* (Balloon Vine), *Opuntia stricta* (Prickly Pear), Bridal Creeper *Asparagus asparagoides*, *Lantana camara* (Lantana), *Senna pendula* var. *glabrata* (Easter Cassia), *Ricinus communis* (Castor Oil Plant), *Rubus fruticosus* species aggregate (Blackberry) and *Araujia sericifera* (Moth Vine).
- Exotic garden plants: *Agave attenuata* (Foxtail Agave), *Phoenix canariensis* (Canary Island Date Palm) and *Juniperus conferta* (Japanese Shore Juniper).

Eight species detected during the ecology site inspection are listed under the *Biosecurity Act 2015* as 'priority' weeds requiring prevention, management, control or eradication



(DPI 2025). These include *Asparagus asparagoides*, *Cardiospermum grandiflorum*, *Lantana camara*, *Opuntia stricta*, *Senecio madagascariensis*, *Ricinus communis*, *Rubus fruticosus* species aggregate and *Araujia sericifera*. All priority weed species detected on the subject land require 'General Biosecurity Duty', being "*All pest plants are regulated with a general biosecurity duty to prevent, eliminate or minimise any biosecurity risk they may pose. Any person who deals with any plant, who knows (or ought to know) of any biosecurity risk, has a duty to ensure the risk is prevented, eliminated or minimised, so far as is reasonably practicable*".

The only native groundcover species detected within the subject land was *Dichondra repens* (Kidney Weed), which was found to occur in a low abundance.

An updated licensed search of the BioNet Wildlife Atlas database (NSW DCCEE 2025c) for records of threatened species within 10 km of the subject land was undertaken on 26 August 2025 (see Appendix C). The search returned 9,981 records of 82 species. Most of these species are unlikely to occur on the subject land due to geographic limitations, lack of suitable habitat and the disturbed and modified condition of the subject land.

Many of the fauna species recorded closest to the subject land are forest or estuary dependent and the location of the records are associated with nearby bushland of Georges River and its tributaries (e.g. Green and Golden Bell Frog, White-bellied Sea-Eagle, Eastern Osprey, Black Bittern, Curlew Sandpiper, Caspian Tern, Crested Tern, South-eastern Glossy Black Cockatoo, Powerful Owl, Little Lorikeet, Swift Parrot, Scarlet Robin, Dusky Woodswallow and Southern Myotis). Most other records of threatened fauna species are sporadic through the 10 km surrounds and represent highly mobile species, or are a substantial distance from the subject land, without connecting habitat (e.g. Koala, Eastern Pygmy-possum, Squirrel Glider and Cumberland Plain Land Snail). The habitat connectivity of the vegetation on the subject land with bushland is impeded by the surrounding commercial developments and roads.

Mobile species recorded nearby that may be of relevance to the subject land include the Grey-headed Flying-fox, and several threatened microchiropteran bats (such as Yellow-bellied Sheath-tail-bat, Eastern Coastal Free-tailed Bat, Little Bent-winged Bat and Large Bent-winged Bat). There is some potential, in particular, that these species could use the native tree canopies across the subject land, or that the structures could be considered potential habitat for threatened microchiropteran bats ('microbats').

Based on the results of an ecological site inspection, the areas of vegetation and the structure to be removed provide marginal artificial habitat for threatened species and removal of these features is not likely to result in a significant impact on threatened species.

An assessment of impacts on biodiversity values in accordance with the BDAR waiver requirements is provided in Table 4. An assessment of each of the specific requirements of the BC Act and BC Regulation are also included in Sections 4.2 to 4.9 in accordance with BDAR waiver guidelines.

Table 4: Impacts on Biodiversity Value

Information Requirement	Project Information
Complete Table 2 below on Biodiversity Values. For each biodiversity value, the proponent must either: explain why the value is not relevant to the proposed development	See Sections 4.2 to 4.9.



Information Requirement	Project Information
where a biodiversity value may be relevant, provide an explanation of how impacts have been avoided and identify the likelihood and extent of any remaining impacts of the proposed development, including impacts prescribed under clause 6.1 of the BC Regulation. A biodiversity value is not relevant to a proposed development if the value is not present on the development site and there is no potential for direct or indirect impacts on the biodiversity value if it occurs off-site.	
Where one or more biodiversity values may be relevant to the proposed development, Table 2 is to be completed by a suitably qualified person with tertiary qualifications in natural sciences including subjects that relate to the observation and description of terrestrial biodiversity and landforms, and at least three years of work experience in environmental assessment including field identification of plant and animal species and habitats. The person does not need to be an accredited person under the BC Act.	This BDAR waiver request has been updated by Jordan Peppin and Elise Newberry. Jordan and Elise's qualifications are included in the "admin" section above.
Attach any additional information required where biodiversity values are relevant to the site. E.g. Vegetation Map (indicating plant community types), Ecology Reports, Water Quality data, BioNet Atlas, Directory of Important Wetlands (DIWA), migratory bird flyway information.	There is no native vegetation mapped by NSW DCCEE 2025a on the subject land. See Figure 1 for native vegetation mapping for the locality and Appendix C for BioNet Atlas search results. The AIA tree schedule and map are provided in Appendix D. Photographs from a site inspection undertaken by SLR Project Ecologist Vander Bertoldo on 19 August 2025 are included in Appendix E. The subject land is not situated in or near any wetlands of national importance, with the nearest wetland being Voyager Point located approximately 4 km to the southeast.

4.2 Vegetation Abundance

Vegetation abundance means the "*occurrence and abundance of vegetation at a particular site*". Vegetation abundance is addressed in Table 5 in accordance with the requirements of Section 1.4(b) of the BC Regulation.

Table 5: Vegetation Abundance

Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
Where vegetation is present on the development site, provide a map on digital aerial photography or the best available imagery of the development site showing:	There is no native vegetation mapped or identified on the subject land but there are a few scattered cultivated native plants across the site. The subject land has a long history of disturbance, as evidenced by historic aerial imagery (refer to Appendix A) and its current condition (Appendix



Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
- native vegetation (including grasslands and other non-woody vegetation types) and non-native vegetation - the area of land that is directly impacted by the proposed development, including related infrastructure such as roads, pipelines, access tracks, temporary material stockpiles, asset protection zones and powerlines, if applicable. Describe how the proposed development avoids impacts on native vegetation and identify the likelihood and extent of any remaining impacts including removal of isolated or cultivated native plants.	E), which supports the view that any native trees presently on the site are planted, cultivated specimens. The subject land and immediately adjacent area contain a total of 40 trees including: - A total of 29 that are native to NSW, being: 6 <i>Melaleuca quinquenervia</i> 5 <i>Callistemon viminalis</i> 3 <i>Leptospermum petersonii</i> 3 <i>Corymbia maculata</i> 2 <i>Eucalyptus nicholii</i> 2 <i>Eucalyptus</i> spp. 2 <i>Brachychiton acerifolius</i> 1 <i>Eucalyptus saligna</i> 1 <i>Eucalyptus tereticornis</i> 1 <i>Angophora costata</i> 1 <i>Melaleuca linariifolia</i> 1 <i>Pittosporum undulatum</i> 1 <i>Melia azedarach</i> - One tree that is native to other states, being <i>Corymbia ficifolia</i> - A total of 10 that are exotic An additional 29 plant species were recorded during the site inspection, of which: - A total of 28 are exotic (including eight priority weeds) - One native herb The vegetation on the subject land is within formed landscaping and street verges and does not represent the native vegetation of the Cumberland Subregion. A total of 31 trees will be removed to facilitate the proposed development. There are no important biodiversity values that would require avoidance through proposed development design. However, the proposal retains a total of nine trees, including: 6 <i>Melaleuca quinquenervia</i> 1 <i>Brachychiton acerifolius</i> 1 <i>Albizia</i> spp. (neighbouring trees) 1 <i>Eucalyptus tereticornis</i> (neighbouring trees) Any trees that are retained will be subject to the AIA and standard tree protection in accordance with Australian Standard AS 4970-2009. This would reduce the likelihood of incidental or indirect impacts on retained trees.

4.3 Vegetation Integrity

Vegetation integrity means the “degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near-



natural state". Vegetation integrity is addressed in Table 6 in accordance with the requirements of Section 1.5(2)(a) of the BC Act.

Table 6: Vegetation Abundance

Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
Describe the vegetation integrity and any impacts on vegetation integrity of identified plant communities. For example, information on impacts from proposed development to vegetation cover, structure, condition and function. This can include details on the presence of weeds, disturbance, planted native vegetation and species and growth form diversity.	There are no mapped or identified plant communities on the subject land or adjoining properties therefore it is not expected that the proposal will impact on the vegetation integrity (i.e. vegetation cover, structure, condition and function) of any plant communities. With respect to planted native vegetation, the subject land contains 29 native trees of which, the development involves the removal of 21. The vegetation situated on the subject land exists in an urban environment and represents planted trees, common and invasive weeds (species as stated in Section 4.1). The subject land's long history of disturbance is evident from the analysis of historic aerial imagery (refer to Appendix A) and it's current condition (Appendix E). Many of the native species on the subject land are not typically found in the Cumberland subregion. Other than the occasional specimen of <i>Dichondra repens</i> (which is a persistent native and at times may be considered a pest species) there is no native ground layer or shrub layer present. Accordingly, vegetation integrity for the planted vegetation within the subject land is likely to be low. Given the existing vegetation on the subject land consists of planted trees and exotic species, the proposal is unlikely to impact vegetation integrity.



4.4 Habitat Suitability

Habitat suitability means the “*degree to which the habitat needs of threatened species are present at a particular site*”. Habitat suitability for potentially relevant threatened species and communities is addressed in Table 7 in accordance with the requirements of Section 1.5(2)(b) of the BC Act.

Table 7: Habitat Suitability

Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
Identify any threatened species or ecological communities or their habitat on the development site. Describe how the proposed development avoids impacts on habitat suitability and identify the likelihood and extent of any remaining impacts including the impacts of development on the following habitat of threatened species or ecological communities: 1. karst, caves, crevices, cliffs and other geological features of significance 2. rocks 3. human-made structures 4. non-native vegetation (prescribed under clause 6.1(1)(a) of the BC Regulation). Impacts may include the removal or modification (e.g. noise, light, etc.) of the habitat of threatened species or ecological communities.	Threatened species of fauna that could potentially utilise the artificial habitats (native and exotic landscape plantings and man-made structures) within the subject land include highly mobile species such as bats and birds. The ecological site inspection undertaken on 19 August 2025, involved inspection of any human-made structures and vegetation for potential microbat roosts in accordance with the DPIE 2019 BDAR waiver guidelines (i.e. using a torch and bat detector to search for roosts), as well as searches for hollows and nests and other signs of fauna activity. No evidence of microbats was detected, and no hollows or other evidence of fauna activity (such as flying fox camps) was noted. There are no buildings or structures on the subject land that could represent suitable habitat for microbats (see photos at Appendix E). The subject land does not represent important habitat or potential breeding habitat for any of the relevant threatened species of fauna (microbats, raptors and forest owls). The site does not contain any natural rocks, karst, caves, crevices, cliffs and other geological features of significance. The subject land does not contain any remnant native vegetation, threatened flora habitats or threatened ecological communities and the prescribed impact features of the subject land, including human-made structures and non-native vegetation, are unlikely to provide any important habitat for any threatened species of fauna potentially using the subject land. One species of threatened plant, <i>Eucalyptus nicholii</i>, has been identified in the centre of the subject land, comprising a total of two trees. The <i>E. nicholii</i> is listed vulnerable under Schedule 1 of the BC act and <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act). Although the <i>E. nicholii</i> plants are native to NSW, the known distribution for this species is restricted to the New England Tablelands from Nundle to north of Tenterfield. <i>E. nicholii</i> is widely cultivated for street tree and landscaping use in southeastern NSW (EUCLID 2025). Due to the history of disturbance at the subject land and the nature of the specimens (within disturbed ground in formed garden beds) the <i>E. nicholii</i> on subject land are almost certainly cultivated for garden purposes. Due to the cultivated nature of the <i>E. nicholii</i> on the subject land these plants do not warrant protection or



Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
	assessment as threatened species under the BC Act. No other threatened species of flora were detected during the ecological site inspection, and the subject land does not represent suitable habitat for threatened flora due to a lack of native vegetation and site disturbances. The subject land is currently not in active use. The proposed development will potentially increase noise, dust and light during the construction phase. The potential increase is unlikely to result in a significant impact on any potential threatened species using the subject land.

4.5 Threatened Species Abundance

Threatened species abundance means the “*occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site*”.

Threatened species abundance is addressed in Table 8 in accordance with the requirements of Section 1.4(a) of the BC Regulation.

Table 8: Threatened Species Abundance

Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
Describe how the proposed development avoids impacts on threatened species abundance and identify the likelihood and extent of any remaining impacts including: - Impacts of vehicle strikes on threatened species of animals or on animals that are part of a threatened ecological community (prescribed under clause 6.1(1)(f) of the Regulation). - Impacts on threatened species, for example, microbats, associated with the demolition of human-made structures (prescribed by 6.1 (1) a (iii) of the Regulation). - Impacts on threatened species habitat associated with non-native vegetation (prescribed by 6.1 (1) a (iv) of the Regulation). - Impacts on threatened species habitat associated with non-natural water bodies (prescribed by 6.1 (1) a (iii) of the Regulation). For example, threatened frogs such as the green and golden bell frog in landfill areas, drains and brick pits.	The proposed development does not involve the removal of native vegetation; however it does include the removal of planted native trees and occasional specimens of <i>Dichondra repens</i>. The cultivated vegetation potentially represents marginal habitat for highly mobile threatened species, such as microbats and birds. With respect to remaining impacts: - Due to the slow speeds of vehicles travelling across the subject land and the lack of evidence for and low likelihood of resident threatened species, impacts of vehicle strikes on threatened species of animal are considered negligible and equivalent to existing vehicle traffic conditions. - As detailed in Section 4.4, there is no potential microbat habitat on the subject land. Impacts on threatened species associated with the demolition of human-made structures are therefore not relevant. - The potential impact on threatened species habitat due to removal of planted trees is likely to be negligible. The development involves the removal of two vulnerable tree species listed under the BC Act and EPBC Act: Narrow-leaved Black Peppermint <i>Eucalyptus nicholii</i>. However, as described in Section 4.4 these two trees are planted and do not represent a relevant example of the threatened species. - There are no relevant impacts on threatened species habitat associated with non-natural waterbodies.



4.6 Habitat Connectivity

Habitat connectivity means the “*degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range*”. Habitat connectivity is addressed in Table 9 in accordance with the requirements of Section 1.4(c) of the BC Regulation.

Table 9: Habitat Connectivity

Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
Identify whether the development site contributes to habitat connectivity. Describe how the proposed development avoids impacts on habitat connectivity and identify the likelihood and extent of any remaining impacts of development on the connectivity of different areas of habitat of threatened species that facilitates the movement of those species across their range (prescribed under clause 6.1(1)(b) of the BC Regulation).	As shown in Figure 1, native vegetation occurs primarily to the north in areas that are associated with Georges River and the South Western Motorway (M5) road corridor. There is a thin strip of native vegetation along Anzac Creek, a tributary of Georges River to the east of the subject land. The subject land is separated from nearby bushland by surrounding commercial developments and roads. As such, the vegetation within the subject land is unlikely to contribute to habitat connectivity in the landscape. Potential impacts on habitat connectivity are avoided in the design through the retention of planted vegetation where possible. The proposed development is unlikely to impact habitat connectivity.

4.7 Threatened Species Movements

Threatened species movements mean the “*degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle*”. Threatened species movements are addressed in Table 10 in accordance with the requirements of Section 1.4(d) of the BC Regulation.

Table 10: Threatened Species Movements

Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
Describe how the proposed development avoids impacts on threatened species movement and identify the likelihood and extent of any remaining impacts of development on movement of threatened species that maintains their lifecycle (prescribed under clause 6.1(1)(c) BC Regulation).	The project proposes the removal of planted vegetation and man-made structures from the subject land. The vegetation within the subject land is disjunct from any area of native vegetation. As such, this habitat is only considered marginal habitat for mobile threatened fauna. The proposed development is unlikely to have any conceivable impacts on threatened species movements.

4.8 Flight Path Integrity

Flight path integrity means the “*degree to which the flight paths of protected animals over a particular site are free from interference*”. Flight path integrity is addressed in Table 11 in accordance with the requirements of Section 1.4(e) of the BC Regulation.



Table 11: Flight Path Integrity

Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
Identify whether flight paths of protected animals occur over the development site. Protected animals are animals of a species listed or referred to in Schedule 5 of the BC Act. They include any species of birds, mammals, amphibians or reptiles that are native to Australia or that periodically or occasionally migrate to Australia. Describe how the proposed development avoids impacts on flight path integrity and identify the likelihood and extent of any remaining impacts. Note: The impacts of wind turbine strikes on protected animals are prescribed under clause 6.1(1)(e) of the BC Regulation. It is, therefore, unlikely that a BDAR waiver would be issued for a proposed wind farm.	Mobile species of bats and birds (such as the Grey-headed Flying Fox, Eastern False Pipistrelle, Greater Broad-nosed Bat, Large Bent-winged Bat, Little Lorikeet and Swift Parrot) could regularly fly over the site. The proposed development would not have any conceivable impacts the flight path integrity of any protected species. The proposed development does not include a wind farm.

4.9 Water Sustainability

Water sustainability means the “*degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site*”. Water sustainability is addressed in Table 12 in accordance with the requirements of Section 1.4(f) of the BC Regulation.

Table 12: Water Sustainability

Explain and document potential impacts including additional impacts prescribed under the BC Regulation	Project Information
Describe how the proposed development avoids impacts on water sustainability and identify the likelihood and extent of any remaining impacts of development on water quality, water bodies and hydrological processes that sustain threatened species and threatened ecological communities (including from subsidence or upsidence resulting from underground mining or other development) (prescribed under clause 6.1(1)(d) of the BC Regulation).	There are no waterbodies or threatened ecological communities on the subject land or adjoining properties. The proposed development will avoid impacts on water sustainability through implementation of best practise erosion and sediment control and stormwater design. The proposed development is not likely to have any conceivable impacts on water sustainability.



5.0 Conclusion

The subject land has a long history of disturbance, initially cleared for agricultural purposes prior to 1943, and more recently impacted by urban development. The vegetation currently consists primarily of planted trees with a weedy under storey. The subject land contains a total of 40 trees, 29 of which are native to NSW. However, at Moorebank, many of these species occur outside their known NSW distribution. A total of 10 trees are exotic species, and one is native to another state of Australia. The vegetation within the subject land does not represent a native PCT, including any PCT that is known to occur in the Cumberland IBRA subregion. The subject land does not contain any waterbodies or watercourses, any natural rocks, karst, caves, crevices, cliffs and other geological features of significance.

Two *Eucalyptus nicholii* have been identified in the centre of the subject land. This species is listed as vulnerable under the BC Act and EPBC Act. Although the *E. nicholii* plants are native to NSW, the known distribution for this species is restricted to the New England Tablelands from Nundle to north of Tenterfield. *E. nicholii* are also known to be widely cultivated for street tree and landscaping purposes in southeastern NSW (EUCLID 2025). Due to the history of disturbance at the site and the nature of the specimens (within disturbed ground in formed garden beds) the *E. nicholii* on site are almost certainly cultivated for landscape purposes. Due to the cultivated nature of the *E. nicholii* on the site these plants do not warrant protection or assessment as threatened species under the BC Act. No other threatened species of flora were detected during the ecological site inspection, and the subject land does not represent suitable habitat for threatened flora due to a lack of native vegetation and site disturbances.

No hollow-bearing trees, microbat habitat or other resources of potential importance to native fauna are present on the site. There are no existing man-made structures (e.g. buildings, warehouses, sheds) on the subject land that could provide habitat for threatened species such as microbats. The landscaped and exotic vegetation on the site is disconnected from any patches of native vegetation, and it is unlikely that this artificial habitat plays a role in the migration movements of any protected species.

The planted trees and exotic vegetation, along with the man-made structures on the site, provide only marginal artificial habitat for mobile threatened species. The proposed development involves the removal of these planted trees and exotic vegetation and includes the construction of two warehouse distribution centres, comprising eight two-storey warehouses, ancillary office accommodation, multilevel carparking, and associated infrastructure.

The development does not propose the construction of turbines that could pose a risk to protected birds or bats. Therefore, it is unlikely to significantly impact the flight paths of any threatened species.

The subject land currently holds very limited and negligible biodiversity values. The proposed development has been designed to avoid and minimise impacts on biodiversity, by the retaining existing planted trees where possible.

Based on the results of the ecological site inspection, the landscaped vegetation provides only marginal artificial habitat for any threatened species that may potentially utilise the subject land. Therefore, the removal of these features is unlikely to result in a significant impact on any threatened species, populations or ecological communities. Accordingly, we request that the requirement for a Biodiversity Development Assessment Report (BDAR), as outlined in the SEARs, be waived for this project application.



6.0 References

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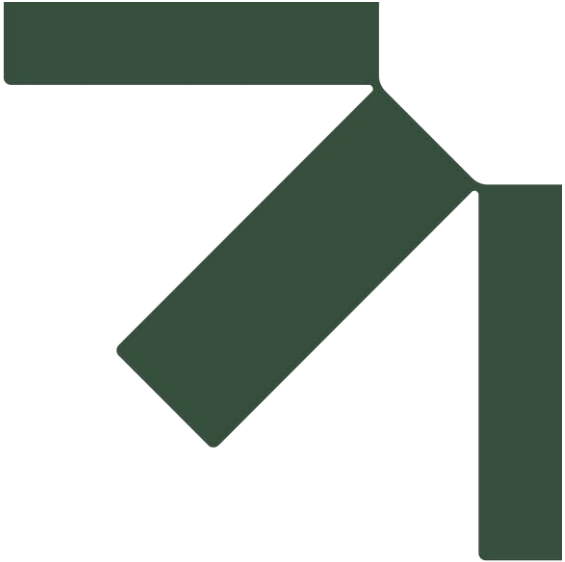
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Appendix A Historic Aerial Imagery

BDAR Waiver Request

Project Marvel – 20 Kelso Crescent, Moorebank

Mapletree SR Australia Management Pty Ltd

SLR Project No.: 630.V14671

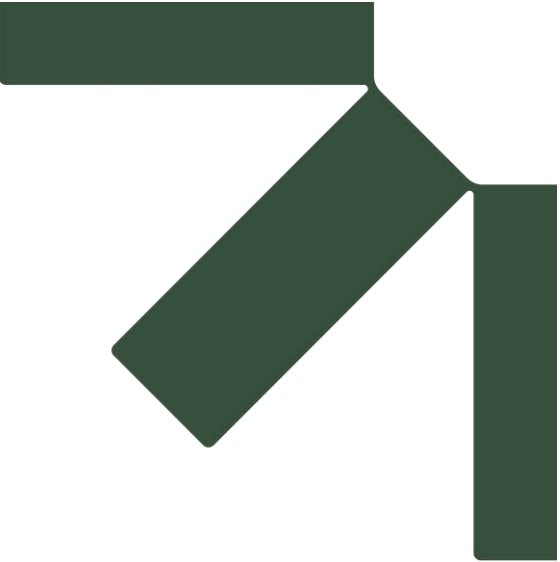
26 September 2025

Figure A1: Extract of Nearmap 2009 Historic Aerial Imagery, showing site boundary (Nearmap 2025)



Figure A2: Extract of Six Maps 1943 Historic Aerial Imagery (DFSI 2023)





Appendix B Site Plans

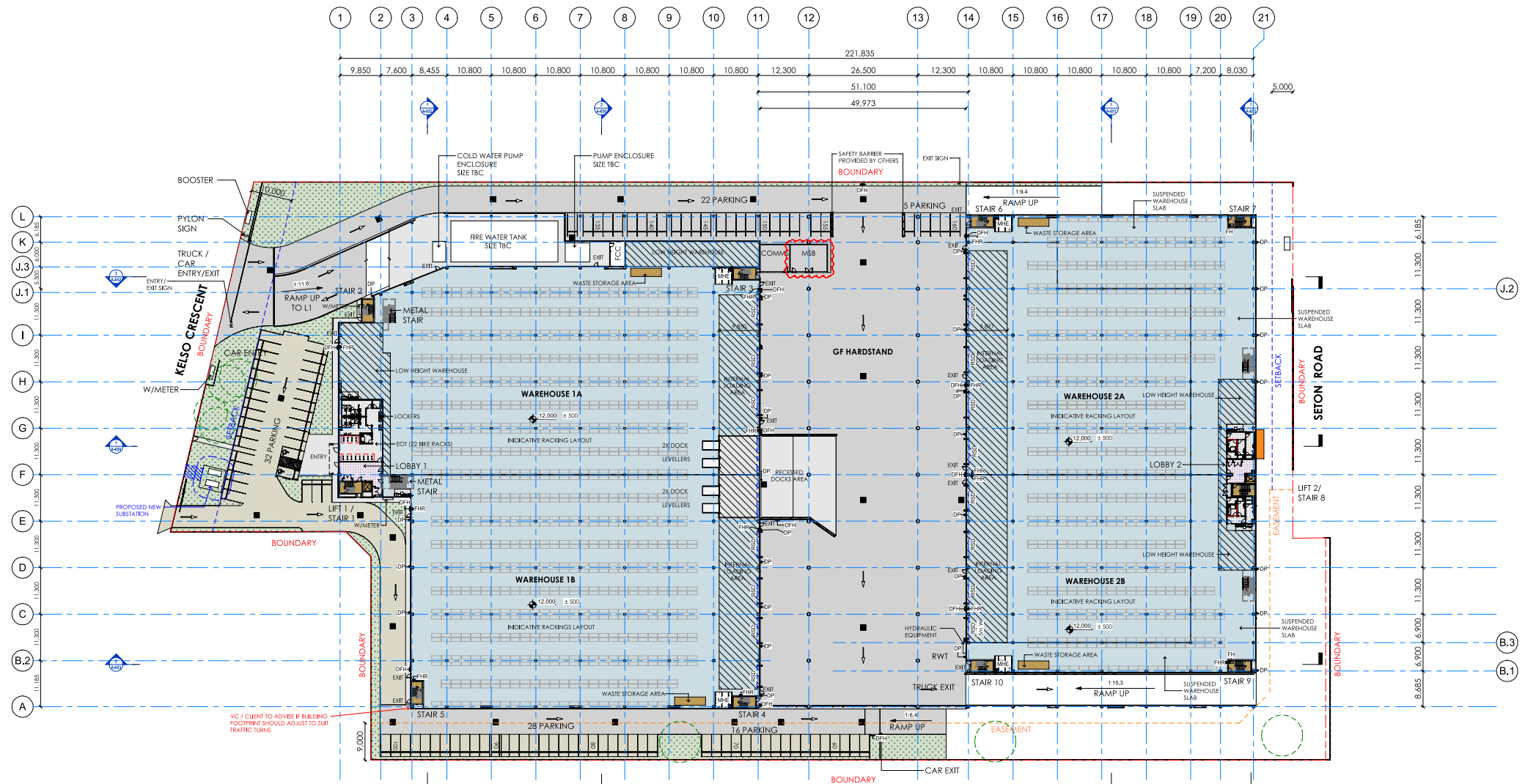
BDAR Waiver Request

Project Marvel – 20 Kelso Crescent, Moorebank

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SLR Project No.: 630.V14671

26 September 2025



1 GROUND FLOOR
1:400 A-600

NOTE: ALL FLOOR LEVELS ± 500

GENERAL LEGEND	
DPH	DUAL HEAD FIRE HYDRANT
DP	DOWNPIPE: POWDERCOATED FINISH IN COLORBOND MONUMENT (WITH 1500mm HIGH GALV MS PROTECTION IN TRAFFICABLE AREAS) - REFER TO HYD ENG'S DETAILS
FH	FIRE HYDRANT
FHR	FIRE HOSE REEL
MHE	MATERIAL HANDLING EQUIPMENT CHARGING STATION
RSD	ROLLER SHUTTER DOOR - POWDERCOATED FINISH - REFER TO DOOR SCHEDULE

NOTE: THE LOCATION OF PROPERTY ALARMING IS DETERMINED FROM SURVEY INFORMATION PROVIDED BY SUBSECTOR.
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MARVEL MAPLETREE
20 KELSO CRES. MOOREBANK
NSW 2170
PRELIMINARY

REVISION	DESCRIPTION	DATE
P1	PRELIMINARY	18.06.25
P2	GENERAL UPDATES	19.07.25
P3	PRELIMINARY	19.07.25
P4	RL CHANGES AND TRUCK TURNS	22.07.25
P5	GENERAL UPDATES	04.08.25
P6	REQUESTED UPDATES	14.08.25

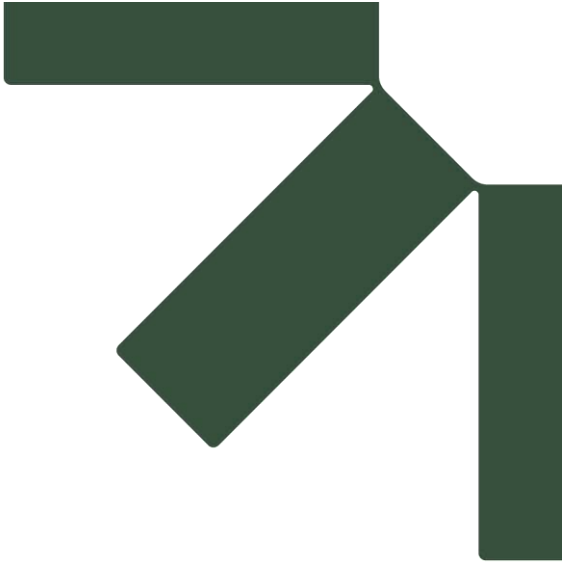
ARCHITECT
PACE
ARCHITECTS

BUILDER / PROJECT MANAGER
VAUGHAN
CONSTRUCTIONS

CLIENT
maple tree

scale 1:400
purpose PRELIMINARY
GROUND FLOOR

date 14.08.25
project no 250211
dwg no 250211 - A-205
sheet no SP
issue P6



Appendix C BioNet Atlas Search Results

BDAR Waiver Request

Project Marvel – 20 Kelso Crescent, Moorebank

Mapletree SR Australia Management Pty Ltd

SLR Project No.: 630.V14671

26 September 2025

Table C-1: Threatened Species BioNet Records within 5 km of the Site

Scientific Name	Common Name	BC Act	EPBC Act	Records
<i>Pseudophryne australis</i>	Red-crowned Toadlet	V		3
<i>Litoria aurea</i>	Green and Golden Bell Frog	E1	V	26
<i>Stictonetta naevosa</i>	Freckled Duck	V		3
<i>Apus pacificus</i>	Fork-tailed Swift		C,J,K	2
<i>Hirundapus caudacutus</i>	White-throated Needletail	V	V,C,J,K	13
<i>Ephippiorhynchus asiaticus</i>	Black-necked Stork	E1		2
<i>Botaurus poiciloptilus</i>	Australasian Bittern	E1	E	1
<i>Ixobrychus flavicollis</i>	Black Bittern	V		25
<i>Circus assimilis</i>	Spotted Harrier	V		8
<i>Haliaeetus leucogaster</i>	White-bellied Sea-Eagle	V		74
<i>Hieraaetus morphnoides</i>	Little Eagle	V		24
<i>Lophoictinia isura</i>	Square-tailed Kite	V		9
<i>Pandion cristatus</i>	Eastern Osprey	V		13
<i>Falco subniger</i>	Black Falcon	V		1
<i>Pluvialis squatarola</i>	Grey Plover	V	V,C,J,K	2
<i>Actitis hypoleucos</i>	Common Sandpiper		C,J,K	3
<i>Calidris acuminata</i>	Sharp-tailed Sandpiper	V	V,C,J,K	1
<i>Calidris ferruginea</i>	Curlew Sandpiper	E4A	CE,C,J,K	1
<i>Gallinago hardwickii</i>	Latham's Snipe	V	V,J,K	4
<i>Limosa lapponica</i>	Bar-tailed Godwit		C,J,K	1
<i>Tringa nebularia</i>	Common Greenshank	E1	E,C,J,K	1
<i>Tringa stagnatilis</i>	Marsh Sandpiper		C,J,K	1
<i>Hydroprogne caspia</i>	Caspian Tern		J	2
<i>Thalasseus bergii</i>	Crested Tern		J	3
<i>Callocephalon fimbriatum</i>	Gang-gang Cockatoo	E1	E	3
<i>Calyptorhynchus lathami lathami</i>	South-eastern Glossy Black-Cockatoo	V	V	7
<i>Lophochroa leadbeateri</i>	Pink Cockatoo	V	E	1
<i>Lathamus discolor</i>	Swift Parrot	E1	CE	37
<i>Neophema pulchella</i>	Turquoise Parrot	V		2
<i>Parvipsitta pusilla</i>	Little Lorikeet	V		132
<i>Ninox connivens</i>	Barking Owl	V		1
<i>Ninox strenua</i>	Powerful Owl	V		22
<i>Tyto novaehollandiae</i>	Masked Owl	V		1



Scientific Name	Common Name	BC Act	EPBC Act	Records
<i>Anthochaera phrygia</i>	Regent Honeyeater	E4A	CE	6
<i>Epthianura albifrons</i>	White-fronted Chat	V		1
<i>Epthianura albifrons</i>	White-fronted Chat population in the Sydney Metropolitan Catchment Management Area	E2,V		1
<i>Melithreptus gularis gularis</i>	Black-chinned Honeyeater (eastern subspecies)	V		10
<i>Daphoenositta chrysoptera</i>	Varied Sittella	V		32
<i>Artamus cyanopterus cyanopterus</i>	Dusky Woodswallow	V		64
<i>Petroica boodang</i>	Scarlet Robin	V		6
<i>Petroica phoenicea</i>	Flame Robin	V		7
<i>Phascolarctos cinereus</i>	Koala	E1	E	237
<i>Cercartetus nanus</i>	Eastern Pygmy-possum	V		3
<i>Petaurus norfolcensis</i>	Squirrel Glider	V		2
<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox	V	V	535
<i>Saccolaimus flaviventris</i>	Yellow-bellied Sheath-tail-bat	V		15
<i>Micronomus norfolkensis</i>	Eastern Coastal Free-tailed Bat	V		18
<i>Chalinolobus dwyeri</i>	Large-eared Pied Bat	E1	E	3
<i>Falsistrellus tasmaniensis</i>	Eastern False Pipistrelle	V		25
<i>Myotis macropus</i>	Southern Myotis	V		25
<i>Scoteanax rueppellii</i>	Greater Broad-nosed Bat	V		29
<i>Miniopterus australis</i>	Little Bent-winged Bat	V		10
<i>Miniopterus orianae oceanensis</i>	Large Bent-winged Bat	V		27
<i>Meridolum corneovirens</i>	Cumberland Plain Land Snail	E1		90
<i>Marsdenia viridiflora</i> subsp. <i>viridiflora</i>	Marsdenia viridiflora R. Br. subsp. viridiflora population in the Bankstown, Blacktown, Camden, Campbelltown, Fairfield, Holroyd, Liverpool and Penrith local government areas	E2		453
<i>Wahlenbergia multicaulis</i>	Tadgell's Bluebell in the local government areas of Auburn, Bankstown, Baulkham Hills, Canterbury, Hornsby, Parramatta and Strathfield	E2		3
<i>Allocasuarina diminuta</i> subsp. <i>mimica</i>	Allocasuarina diminuta subsp. mimica population in the Sutherland Shire and Liverpool City local government areas	E2		3
<i>Allocasuarina glareicola</i>		E1	E	1
<i>Wilsonia backhousei</i>	Narrow-leafed Wilsonia	V		1



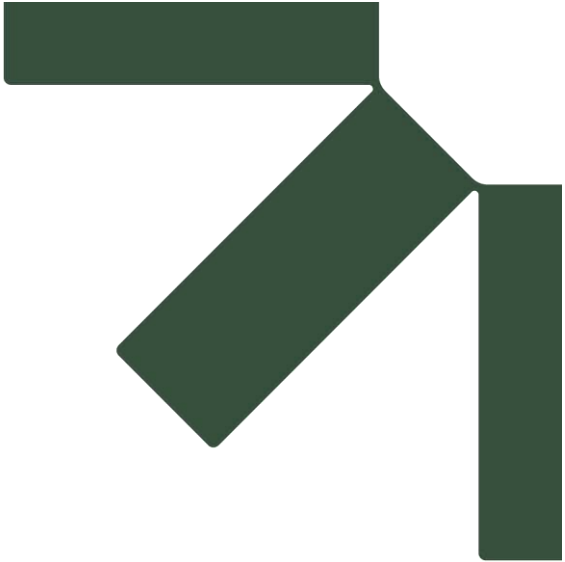
Scientific Name	Common Name	BC Act	EPBC Act	Records
<i>Hibbertia fumana</i>		E4A		1118
<i>Hibbertia puberula</i>		E1		1251
<i>Hibbertia</i> sp. Bankstown		E4A	CE	217
<i>Epacris purpurascens</i> var. <i>purpurascens</i>		V		1
<i>Leucopogon exolasius</i>	Woronora Beard-heath	V	V	3
<i>Pultenaea pedunculata</i>	Matted Bush-pea	E1		2
<i>Acacia bynoeana</i>	Bynoe's Wattle	E1	V	159
<i>Acacia pubescens</i>	Downy Wattle	V	V	2752
<i>Prostanthera saxicola</i>	<i>Prostanthera saxicola</i> population in Sutherland and Liverpool local government areas	E2		1
<i>Callistemon linearifolius</i>	Netted Bottle Brush	V		25
<i>Eucalyptus nicholii</i>	Narrow-leaved Black Peppermint	V	V	2
<i>Eucalyptus scoparia</i>	Wallangarra White Gum	E1	V	2
<i>Melaleuca deanei</i>	Deane's Paperbark	V	V	1
<i>Rhodamnia rubescens</i>	Scrub Turpentine	E4A	CE	1
<i>Syzygium paniculatum</i>	Magenta Lilly Pilly	V	V	1
<i>Diuris aequalis</i>	Buttercup Doubletail	E1	E	1
<i>Grevillea parviflora</i> subsp. <i>parviflora</i>	Small-flower Grevillea	V	V	1756
<i>Macadamia integrifolia</i>	Macadamia Nut		V	2
<i>Macadamia tetraphylla</i>	Rough-shelled Bush Nut	V	V	2
<i>Persoonia hirsuta</i>	Hairy Geebung	E1	E	2
<i>Persoonia nutans</i>	Nodding Geebung	E1	E	514
<i>Pomaderris brunnea</i>	Brown Pomaderris	E1	V	5
<i>Pimelea spicata</i>	Spiked Rice-flower	E1	E	127

Key: BC Act (species listing under the *Biodiversity Conservation Act 2016*); EPBC Act (species listing under the *Environment Protection and Biodiversity Conservation Act 1999*); V (vulnerable); E1 and E (endangered); E4A and CE (critically endangered); E2 (endangered population); E4 and X (extinct) C, J, K (migratory species - China, Japan and/or Korea migratory bird agreements).

Data from the BioNet Atlas website, which holds records from a number of custodians. The data are only indicative and cannot be considered a comprehensive inventory, and may contain errors and omissions. Species listed under the Sensitive Species Data Policy may have their locations denatured (^ rounded to 0.1°C; ^^ rounded to 0.01°C. Copyright the State of NSW through the Department of Planning, Industry and Environment. Search criteria : Licensed Report of all Valid Records of Threatened (listed on BC Act 2016) ,Commonwealth listed ,CAMBA listed ,JAMBA listed or ROKAMBA listed Entities in selected area [North: -33.88 West: 150.89 East: 150.99 South: -33.98] returned a total of 9,981 records of 82 species.

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Appendix D Arboricultural Impact Assessment Report Tree Map and Tree Schedule

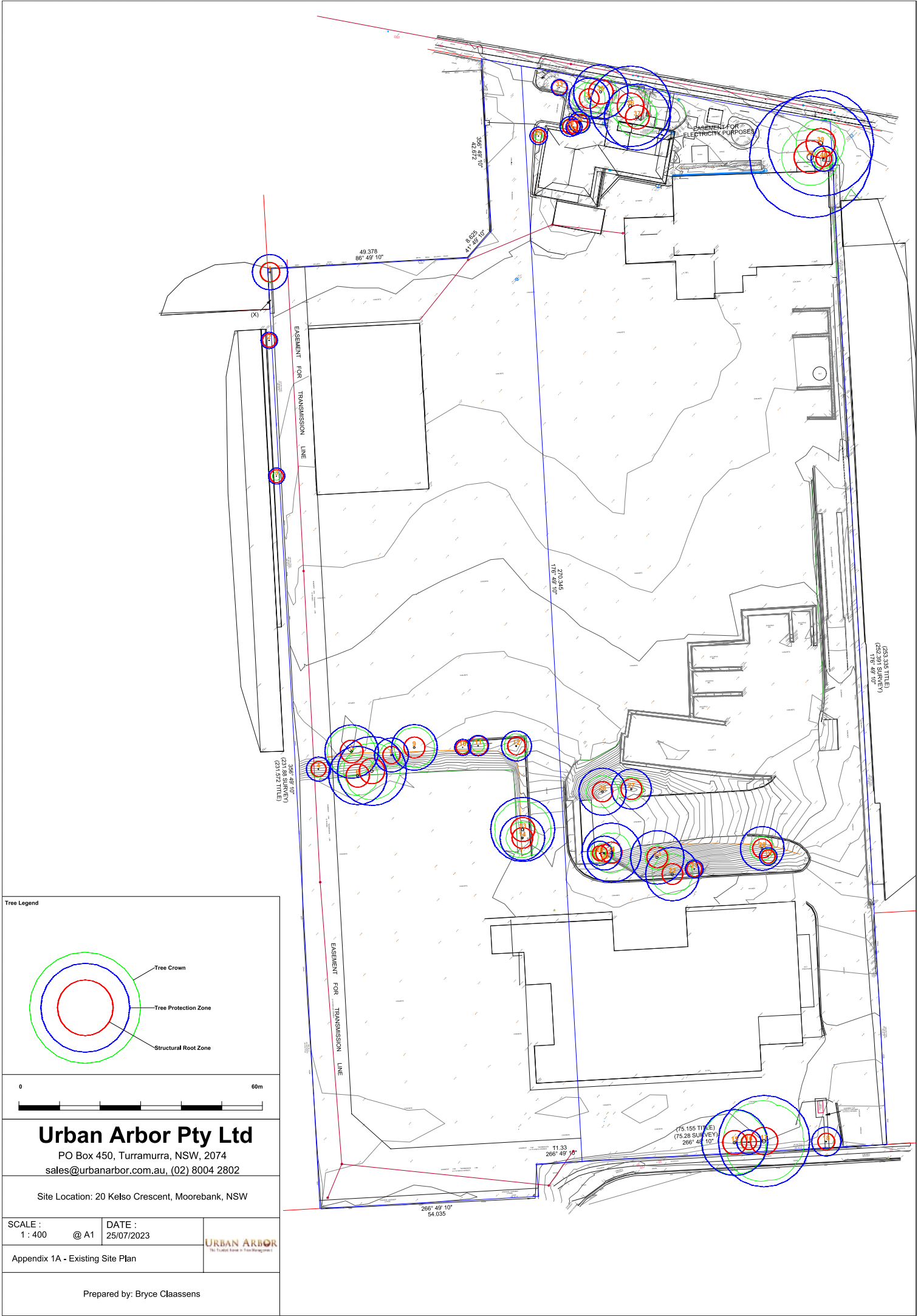
BDAR Waiver Request

Project Marvel – 20 Kelso Crescent, Moorebank

Mapletree SR Australia Management Pty Ltd

SLR Project No.: 630.V14671

26 September 2025



Appendix 2 - Tree Inspection Schedule

Tree ID	Common Name	Botanical Name	Age Class	Height (m)	Canopy Spread Radius (m)	Stem 1	Stem 2	Stem 3	Stem 4	Stem 5	DBH (mm)	DAB (mm)	Health	Structure	Amenity Value	SULE	Retention Value	TPZ Radius (m)	SRZ Radius (m)	Notes
1	Snow In Summer	<i>Melaleuca linariifolia</i>	Semi-mature	7	2.5	330	150				362	460	Good	Fair	Low	3. Short	Z10	4.3	2.4	The tree has not been identified on the received plans. Previously topped, crown is epicormic regrowth only.
2	Forest Red Gum	<i>Eucalyptus tereticornis</i>	Young	6	2	170					170	200	Good	Fair	Very Low	5. Small/Young	Z1	2.0	1.7	The tree has not been identified on the received plans. Located within the adjoining property. DBH estimated.
3	Albizia	<i>Albizia spp</i>	Young	5	1	150					150	180	Good	Fair	Low	5. Small/Young	Z1	2.0	1.6	The tree has not been identified on the received plans. Located within the adjoining property.
4	Broad Leaved Privet	<i>Ligustrum lucidum</i>	Semi-mature	4.5	2	250					250	250	Good	Fair	Very Low	5. Small/Young	Z3	3.0	1.8	Exempt species.
5	Spotted Gum	<i>Corymbia maculata</i>	Mature	19	6	550					550	680	Good	Good	High	1. Long	A1	6.6	2.8	None.
6	Spotted Gum	<i>Corymbia maculata</i>	Mature	16	5	600					600	720	Good	Good	High	1. Long	A1	7.2	2.9	Asymmetric crown shape.
7	Spotted Gum	<i>Corymbia maculata</i>	Mature	20	7	710					710	890	Good	Good	Very High	1. Long	AA1	8.5	3.2	None.
8	Broad Leaved Privet	<i>Ligustrum lucidum</i>	Mature	5	3	350					350	350	Good	Fair	Very Low	5. Small/Young	Z3	4.2	2.1	Exempt species.
9	Eucalypt	<i>Eucalyptus spp</i>	Mature	8	5	470					470	560	Fair	Good	High	2. Medium	A2	5.6	2.6	Low foliage density for species.
10	Pear	<i>Pyrus spp</i>	Young	4	1.5	120	110				163	200	Good	Fair	Low	5. Small/Young	Z1	2.0	1.7	None.
11	Eucalypt	<i>Eucalyptus spp</i>	Young	6	1.5	140	80	100	50	80	212	450	Good	Fair	Low	5. Small/Young	Z9	2.5	2.4	Regrowth from stump.
12	White Cedar	<i>Melia azedarach</i>	Mature	6	3	310					310	370	Good	Good	Medium	2. Medium	A1	3.7	2.2	Not in leaf.
13	Black Peppermint	<i>Eucalyptus nicholii</i>	Mature	12	7	660					660	770	Good	Good	High	2. Medium	A1	7.9	3.0	None.
14	Black Peppermint	<i>Eucalyptus nicholii</i>	Mature	9	4	460					460	550	Fair	Fair	High	3. Short	Z11	5.5	2.6	Low foliage density for species. Suppressed by adjacent tree.
15	Smooth Barked Apple	<i>Angophora costata</i>	Mature	19	8	680					680	780	Good	Good	High	1. Long	A1	8.2	3.0	None.
16	Red Flowering Gum	<i>Corymbia ficifolia</i>	Semi-mature	4	2	250					250	250	Fair	Fair	Low	5. Small/Young	Z1	3.0	1.8	Vine cover. Suppressed.
17	Sydney Blue Gum	<i>Eucalyptus saligna</i>	Mature	21	10	940					940	1060	Good	Good	Very High	1. Long	AA1	11.3	3.4	Crown raised to 8m on North side.
18	Illawara Flame	<i>Brachychiton acerifolius</i>	Semi-mature	5	2	110	220	140	100		300	330	Fair	Good	Low	5. Small/Young	Z1	3.6	2.1	Low foliage density.
19	Sweet Pittosporum	<i>Pittosporum undulatum</i>	Semi-mature	5	2	180					180	200	Good	Fair	Low	5. Small/Young	Z1	2.2	1.7	Surrounded by weed species.
20	Weeping Bottlebrush	<i>Callistemon viminalis</i>	Semi-mature	5.5	3	450					450	450	Good	Fair	Low	5. Small/Young	Z1	5.4	2.4	The tree has not been identified on the received plans. DBH estimated at base.
21	Broad Leaved Privet	<i>Ligustrum lucidum</i>	Young	5	2	120	140				184	250	Fair	Fair	Very Low	5. Small/Young	Z3	2.2	1.8	Exempt species.
22	Cotoneaster	<i>Cotoneaster spp</i>	Mature	6	5	550					550	550	Good	Fair	Low	3. Short	Z9	6.6	2.6	Located on steep embankment.
23	Broad Leaved Privet	<i>Ligustrum lucidum</i>	Mature	6	3	550					550	550	Fair	Fair	Very Low	3. Short	Z3	6.6	2.6	Exempt species. Dieback in crown.
24	Peppercorn	<i>Schinus molle</i>	Mature	7	5	460	400				610	580	Good	Fair	Medium	2. Medium	A1	7.3	2.6	Located on steep embankment.
25	Weeping Bottlebrush	<i>Callistemon viminalis</i>	Semi-mature	4.5	2.5	350					350	350	Good	Fair	Low	5. Small/Young	Z1	4.2	2.1	The tree has not been identified on the received plans. DBH estimated at base.
26	Weeping Bottlebrush	<i>Callistemon viminalis</i>	Semi-mature	4.5	1.5	250					250	250	Good	Fair	Low	5. Small/Young	Z1	3.0	1.8	The tree has not been identified on the received plans. DBH estimated at base.
27	Weeping Bottlebrush	<i>Callistemon viminalis</i>	Mature	6	3	300	200	200			412	550	Good	Fair	Medium	2. Medium	A1	4.9	2.6	Epicormic growth at base.
28	Weeping Bottlebrush	<i>Callistemon viminalis</i>	Mature	7	4	250	360	210			486	520	Good	Good	Medium	1. Long	A1	5.8	2.5	Mistletoe in lower crown.
29	Chinese Thuja	<i>Thuja orientalis</i>	Young	3.5	1	180					180	190	Good	Fair	Low	5. Small/Young	Z1	2.2	1.6	The tree has not been identified on the received plans.
30	Lemon Scented Tea Tree	<i>Leptospermum petersonii</i>	Semi-mature	4.5	2	130	160				206	250	Poor	Fair	Low	4. Remove	Z4	2.5	1.8	Advanced decline.
31	Lemon Scented Tea Tree	<i>Leptospermum petersonii</i>	Young	4	1.5	150					150	170	Good	Good	Low	5. Small/Young	Z1	2.0	1.6	None.
32	Lemon Scented Tea Tree	<i>Leptospermum petersonii</i>	Semi-mature	4.5	2.5	220					220	340	Good	Fair	Low	5. Small/Young	Z1	2.6	2.1	Co-dominant stems with included bark.
33	Prunus	<i>Prunus spp</i>	Semi-mature	3.5	2	110	110				156	250	Good	Fair	Low	5. Small/Young	Z1	2.0	1.8	The tree has not been identified on the received plans.
34	Broad Leaved Paperbark	<i>Melaleuca quinquenervia</i>	Mature	10	4	420					420	480	Good	Good	High	1. Long	A1	5.0	2.4	None.
35	Broad Leaved Paperbark	<i>Melaleuca quinquenervia</i>	Mature	12	4	560					560	800	Good	Good	High	1. Long	A1	6.7	3.0	Pruned for power line clearance.
36	Broad Leaved Paperbark	<i>Melaleuca quinquenervia</i>	Mature	12	5	830					830	990	Good	Good	High	1. Long	A1	10.0	3.3	None.
37	Broad Leaved Paperbark	<i>Melaleuca quinquenervia</i>	Mature	10	5	680					680	750	Good	Good	High	1. Long	A1	8.2	2.9	Within 2m of the existing building.
38	Broad Leaved Paperbark	<i>Melaleuca quinquenervia</i>	Veteran	18	7	1600					1600	1600	Good	Good	Very High	1. Long	AA1	15.0	4.0	DBH and DAB measured at 0.5m above grade. 2.9m from the existing building.
39	Broad Leaved Paperbark	<i>Melaleuca quinquenervia</i>	Mature	17	6	1090					1090	1240	Good	Good	Very High	1. Long	AA1	13.1	3.6	None.
40	Illawara Flame	<i>Brachychiton acerifolius</i>	Mature	8	2.5	260					260	280	Good	Fair	Medium	3. Short	Z11	3.1	1.9	Asymmetric crown shape. Suppressed by adjacent trees.

Appendix 2 - Tree Inspection Schedule

Tree ID	Common Name	Botanical Name	Age Class	Height (m)	Canopy Spread Radius (m)	Stem 1	Stem 2	Stem 3	Stem 4	Stem 5	DBH (mm)	DAB (mm)	Health	Structure	Amenity Value	SULE	Retention Value	TPZ Radius (m)	SRZ Radius (m)	Notes
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Explanatory Notes

Tree Species - Common name followed by botanical name. Where species is unknown it is indicated with an 'spp'.

Age Class - Over mature (OM), Mature (M), Early mature (EM), Semi mature (SM), Young (Y).

Diameter at Breast Height (DBH) - Measured with a DBH tape or estimated at approximately 1.4m above ground level.

Diameter Above root Buttresses (DAB): Measured with a DBH tape or estimated above root buttresses (DAB) for calculating the SRZ.

Height - Height from ground level to top of crown. All heights are estimated unless otherwise indicated.

Spread - Radius of crown at widest section. All tree spreads are estimated unless otherwise indicated.

Tree Protection Zone (TPZ) - DBH x 12. Measured in radius from the centre of the trunk. Rounded to nearest 0.1m. For monocots, the TPZ is set at 1 metre outside the crown projection.

Structural Root Zone (SRZ) - $(DAB \times 50)^{0.42} \times 0.64$. Measured in radius from the centre of the trunk. Rounded up to nearest 0.1m.

Health - Good/Fair/Poor/Dead

Structure - Good/Fair/Poor

Safe Useful Life Expectancy (SULE) - 1. Long (40+years), 2. Medium (15 - 40 years), 3. Short (5 - 15 years), 4. Remove (under 5 years), 5. Small/young.

Amenity Value - Very High/High/Medium/Low/Very Low.

Retention Value: Tree AZ, see appendix 3 for categories.

11. TREE PROTECTION REQUIREMENTS

- 11.1 Use of this report:** All contractors must be made aware of the tree protection requirements prior to commencing works at the site. This report and a copy of the site plans (Appendix 1) drawing must also be made available to any contractor prior to works commencing and during any on site operations. Appendix 1B includes the recommended location of tree protection overlaid onto the proposed site plan.
- 11.2 Project Arborist:** Prior to any works commencing at the site a project Arborist should be appointed. The project Arborist should be qualified to a minimum AQF level 5 and/or equivalent qualifications and experience, and should assist with any development issues relating to trees that may arise. If at any time it is not feasible to carryout works in accordance with this, an alternative must be agreed in writing with the project Arborist.
- 11.3 Tree work:** All tree work should be carried out by a qualified and experienced Arborist with a minimum of AQF level 3 in arboriculture, in accordance with NSW Work Cover Code of Practice for the Amenity Tree Industry (1998) and AS4373 Pruning of amenity trees (2007).
- 11.4 Initial site meeting/on-going regular inspections:** The project Arborist is to hold a pre-construction site meeting with principal contractor to discuss methods and importance of tree protection measures and resolve any issues in relation to tree protection that may arise. In accordance with AS4970-2009, the project Arborist should carryout regular site inspections to ensure works are carried out in accordance with this document throughout the development process. Site inspections are recommended on a monthly frequency throughout the development.
- 11.5 Site Specific Tree Protection Recommendations:** It is the responsibility of the principal contractor to install tree protection prior to works commencing at the site (prior to demolition works) and to ensure that the tree protection remains in adequate condition for the duration of the development. The tree protection must not be moved without prior agreement of the project Arborist. The project Arborist must inspect that the tree protection has been installed in accordance with this document and AS4970-2009 prior to works commencing. See section 11.6 for requirements of tree protection. See Appendix 1B for indicative fencing location.

Tree ID	Tree Species	TPZ Radius (m)	SRZ Radius (m)	Recommendations
1	<i>Melaleuca linariifolia</i>	4.3	2.4	Remove.
2	<i>Eucalyptus tereticornis</i>	2.0	1.7	Retain and protect. Tree protection fencing within the site only. The fencing must be setback from the proposed hard surfacing by 1m to allow for the works. TPZ signage is required on the fencing. Mulch is required within the fenced area.

Tree ID	Tree Species	TPZ Radius (m)	SRZ Radius (m)	Recommendations
3	<i>Albizia spp</i>	2.0	1.6	Retain and protect. Tree protection fencing within the site only. The fencing must be setback from the proposed hard surfacing by 1m to allow for the works. TPZ signage is required on the fencing. Mulch is required within the fenced area.
4	<i>Ligustrum lucidum</i>	3.0	1.8	Remove.
5	<i>Corymbia maculata</i>	6.6	2.8	Remove.
6	<i>Corymbia maculata</i>	7.2	2.9	Remove.
7	<i>Corymbia maculata</i>	8.5	3.2	Remove.
8	<i>Ligustrum lucidum</i>	4.2	2.1	Remove.
9	<i>Eucalyptus spp</i>	5.6	2.6	Remove.
10	<i>Pyrus spp</i>	2.0	1.7	Remove.
11	<i>Eucalyptus spp</i>	2.5	2.4	Remove.
12	<i>Melia azedarach</i>	3.7	2.2	Remove.
13	<i>Eucalyptus nicholii</i>	7.9	3.0	Remove.
14	<i>Eucalyptus nicholii</i>	5.5	2.6	Remove.
15	<i>Angophora costata</i>	8.2	3.0	Remove.
16	<i>Corymbia ficifolia</i>	3.0	1.8	Remove.
17	<i>Eucalyptus saligna</i>	11.3	3.4	Remove.
18	<i>Brachychiton acerifolius</i>	3.6	2.1	Remove.
19	<i>Pittosporum undulatum</i>	2.2	1.7	Remove.
20	<i>Callistemon viminalis</i>	5.4	2.4	Remove.
21	<i>Ligustrum lucidum</i>	2.2	1.8	Remove.
22	<i>Cotoneaster spp</i>	6.6	2.6	Remove.
23	<i>Ligustrum lucidum</i>	6.6	2.6	Remove.
24	<i>Schinus molle</i>	7.3	2.6	Remove.
25	<i>Callistemon viminalis</i>	4.2	2.1	Remove.
26	<i>Callistemon viminalis</i>	3.0	1.8	Remove.
27	<i>Callistemon viminalis</i>	4.9	2.6	Remove.
28	<i>Callistemon viminalis</i>	5.8	2.5	Remove.
29	<i>Thuja orientalis</i>	2.2	1.6	Remove.
30	<i>Leptospermum petersonii</i>	2.5	1.8	Remove.
31	<i>Leptospermum petersonii</i>	2.0	1.6	Remove.
32	<i>Leptospermum petersonii</i>	2.6	2.1	Remove.
33	<i>Prunus spp</i>	2.0	1.8	Remove.

 Site Address: 20 Kelso Crescent, Moorebank, NSW.

Prepared for: Marvel.

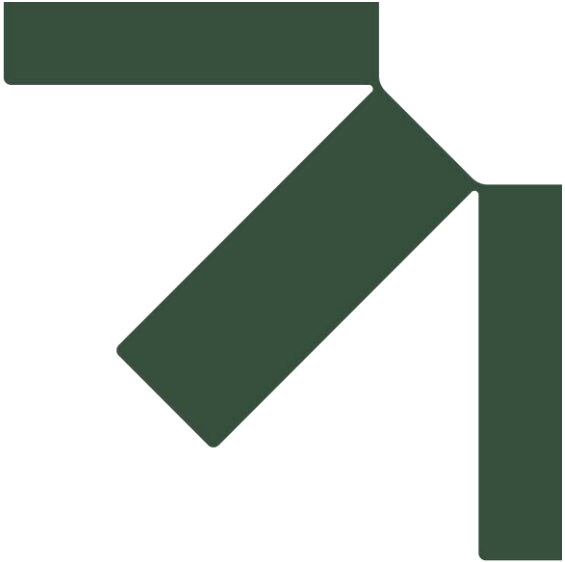
Prepared by: Bryce Claassens, Urban Arbor Pty Ltd, sales@urbanarbor.com.au, (02) 8004 2802.

Date prepared: 18 September 2025. Rev: 3.

Tree ID	Tree Species	TPZ Radius (m)	SRZ Radius (m)	Recommendations
34	<i>Melaleuca quinquenervia</i>	5.0	2.4	Retain and protect. Tree protection fencing is to create a combined exclusion zone for tree 34, 35, 36 and 37. The Fencing is to encompass as much of the TPZ area within the site as practical whilst allowing for the works. The fencing should be set back from the proposed hard surfacing by 1m to allow for the works. TPZ signage is required on the fencing. Mulch is required within the fenced area.
35	<i>Melaleuca quinquenervia</i>	6.7	3.0	Retain and protect. See tree protection recommendations for tree 34.
36	<i>Melaleuca quinquenervia</i>	10.0	3.3	Retain and protect. See tree protection recommendations for tree 34.
37	<i>Melaleuca quinquenervia</i>	8.2	2.9	Retain and protect. See tree protection recommendations for tree 34.
38	<i>Melaleuca quinquenervia</i>	15.0	4.0	Retain and protect. Tree protection fencing is to create a combined exclusion zone for tree 38, 39 and 40. The Fencing is to encompass as much of the TPZ area within the site as practical whilst allowing for the works. The fencing should be set back from the proposed hard surfacing by 1m to allow for the works. TPZ signage is required on the fencing. Mulch is required within the fenced area.
39	<i>Melaleuca quinquenervia</i>	13.1	3.6	Retain and protect. See tree protection recommendations for tree 38.
40	<i>Brachychiton acerifolius</i>	3.1	1.9	Retain and protect. See tree protection recommendations for tree 38.

11.6 Tree Protection Specifications:

- 11.6.1 Trunk and Branch Protection: The trunk must be protected by wrapped hessian or similar material to limit damage. Timber planks (50mm x 100mm or similar) should then be placed around tree trunk. The timber planks should be spaced at 100mm intervals, and must be fixed against the trunk with tie wire, or strapping and connections finished or covered to protect pedestrians from injury. The hessian and timber planks must not be fixed to the tree in any instance. The trunk and branch protection shall be installed prior to any work commencing on site and shall be maintained in good condition for the entire development period.
- 11.6.2 Protective fencing: The protective fencing must be constructed of 1.8 metre 'cyclone chainmesh fence'. The fencing should only be removed for the landscaping phase and this should be approved by the project Arborist. Where it is not feasible to install fencing at the specified location due to factors such as restricting access to areas of the site or for constructing new structures, an alternative location and protection specification must be agreed with the project Arborist. Any modifications to the fencing locations must be approved by the project Arborist.



Appendix E Site Photos

BDAR Waiver Request

Project Marvel – 20 Kelso Crescent, Moorebank

Mapletree SR Australia Management Pty Ltd

SLR Project No.: 630.V14671

26 September 2025

Photo 1: Vegetation along Kelso Crescent frontage, looking north-west



Photo 2: Hardstand area along western boundary of subject land



Photo 3: Weed Species *Taraxacum officinale* within subject land



Photo 4: View facing southwest of central gravel area within subject land

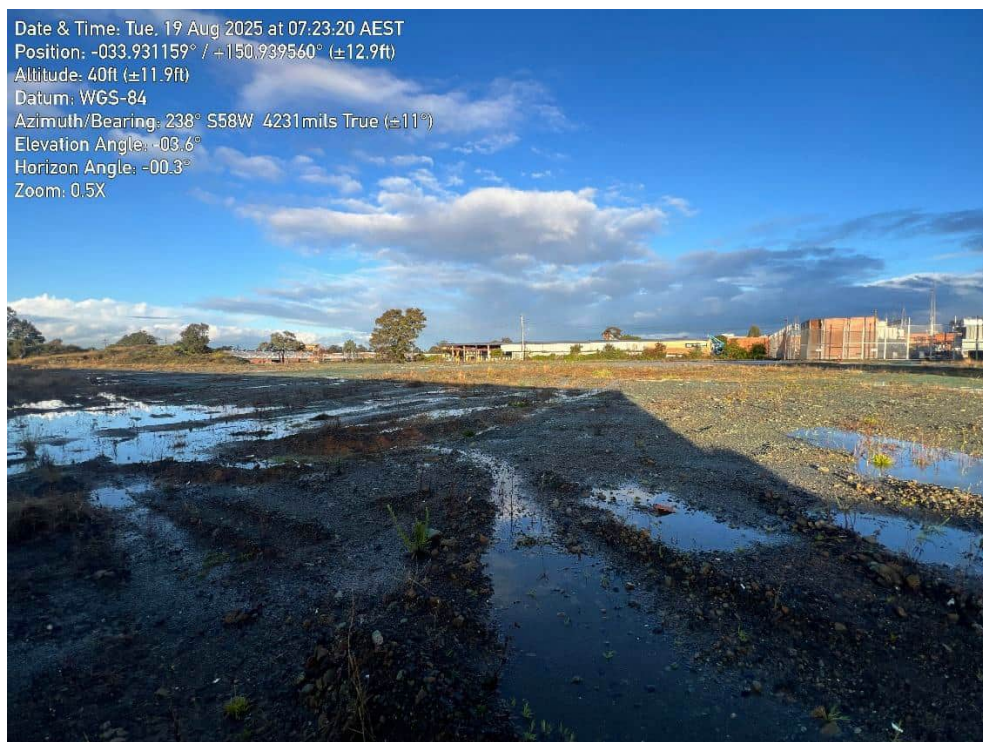


Photo 5: Patch of exotic vegetation along western boundary of subject land

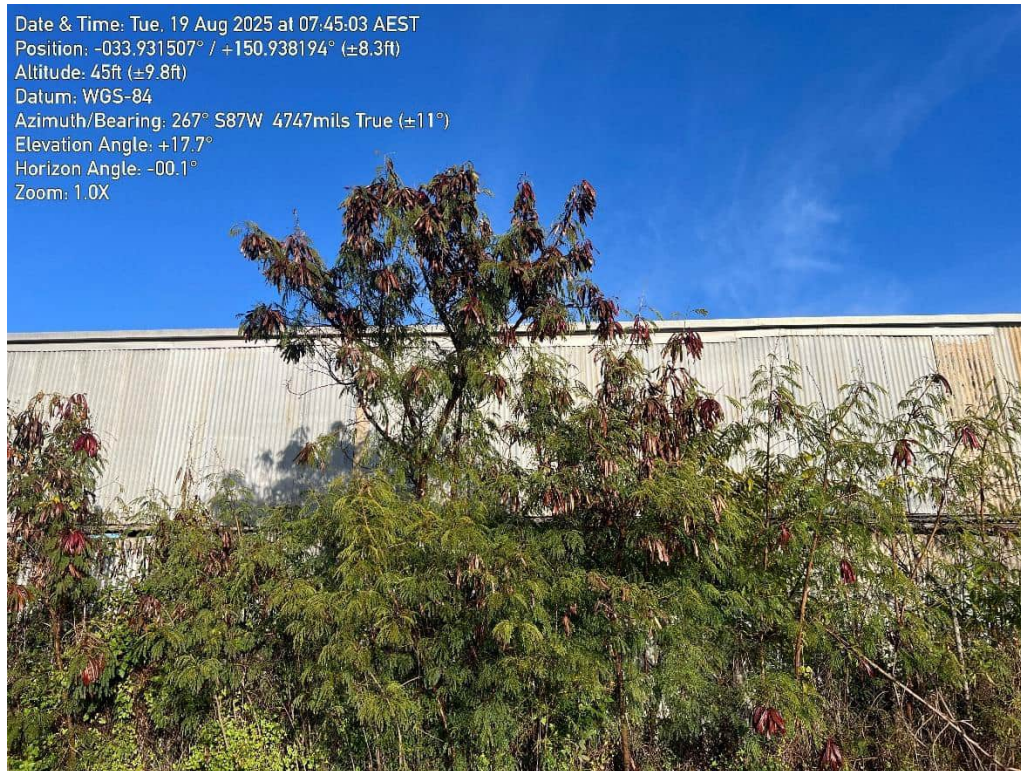


Photo 6: View of the centre of the subject land, looking north-west



Photo 7: Vegetation along Seaton Road frontage, looking west

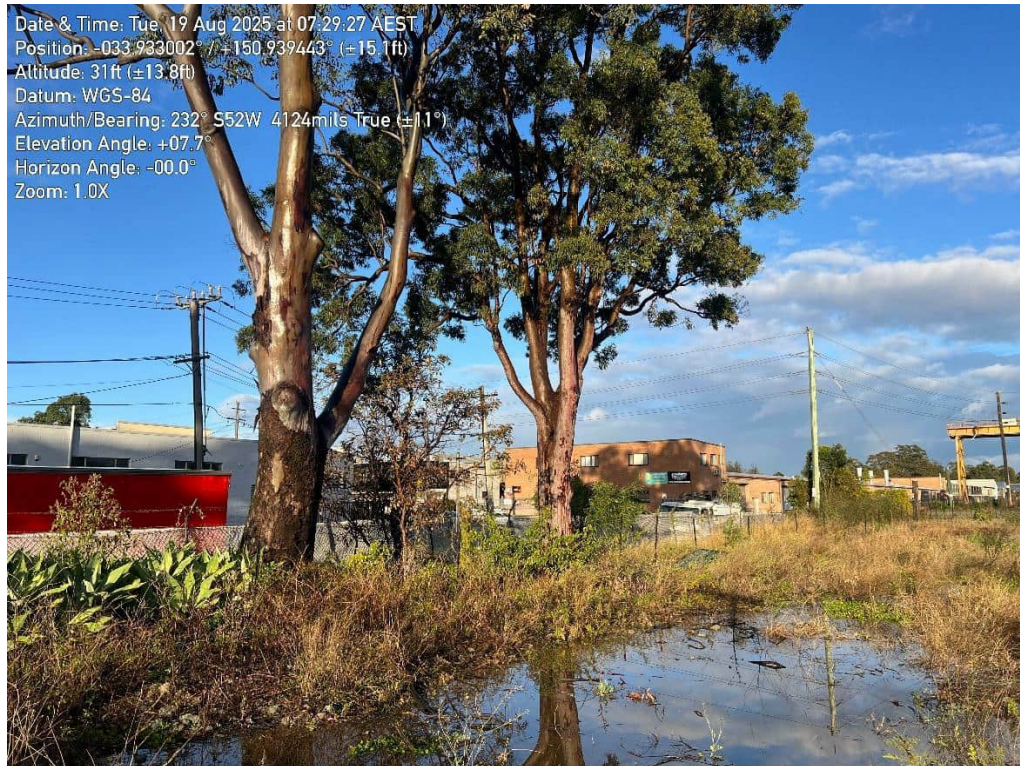
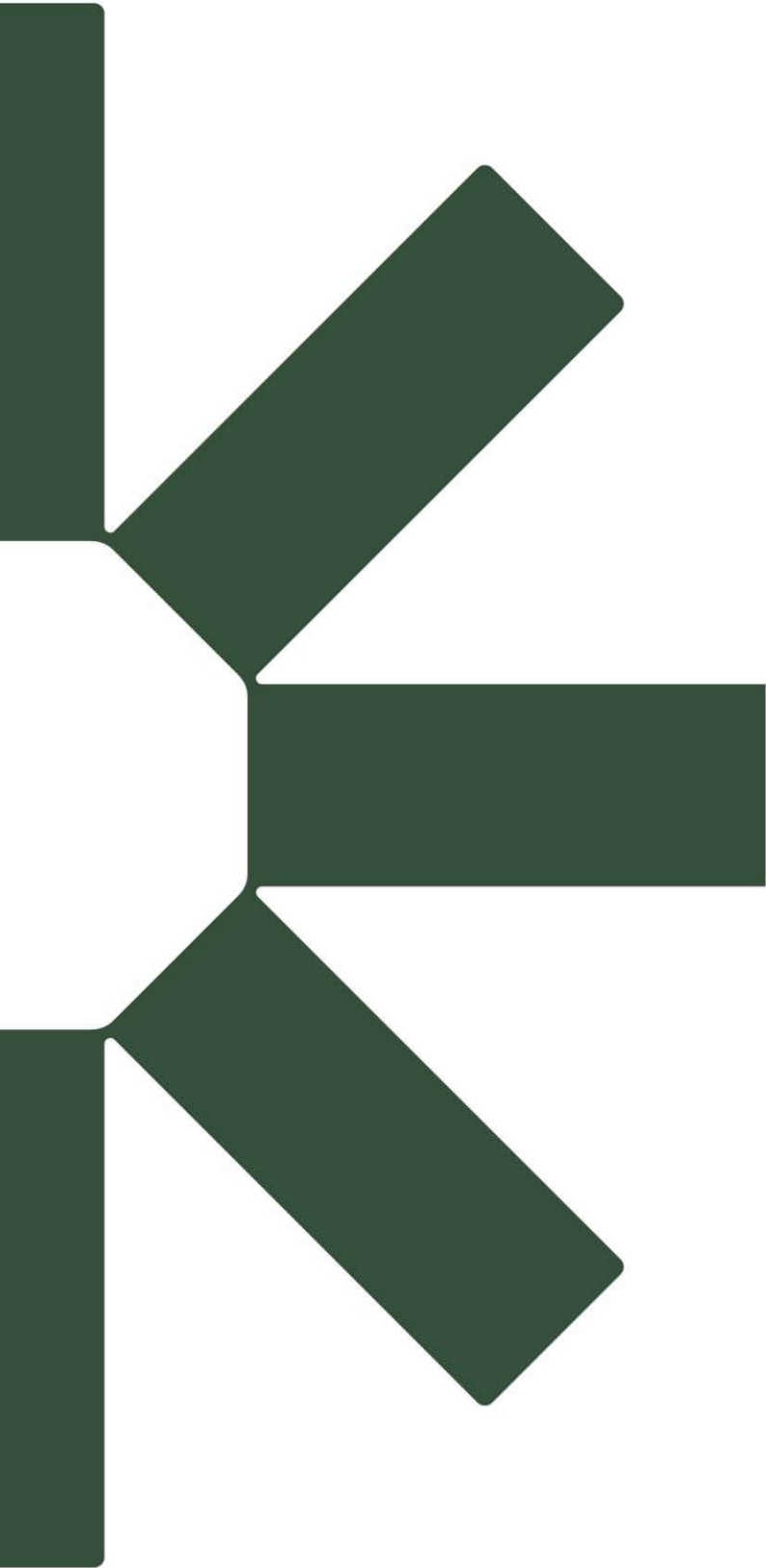


Photo 8: *Eucalyptus nicholii* in the centre of the subject land





Making Sustainability Happen