



14 June 2022

**Submission of Blacktown & District Environment Group Inc  
SSD-49584708**

**Light Horse Interchange 165 Wallgrove Rd Eastern Creek**

Blacktown & District Environment Group Inc (BDEG) objects to the proposal SSD-49584708 at 165 Wallgrove Rd, Eastern Creek, Light Horse Interchange Warehouses Lot 1 and 3

The proposal represents a gross overdevelopment of the site and is surely inconsistent with the objectives of Western Sydney Parklands as a green space and a biodiversity corridor, land that when Western Sydney Parklands were established were "never to be developed" as stated by the Premier of the day *circa* 2005. Western Sydney Parklands were intended to restore a balance between urban development and nature in Western Sydney.

The bulk and scale of the proposed warehouses on site at over 30 m high and over 165,000 m<sup>2</sup> of gross floor area plus hardstand areas for car parks and ancillary buildings devoid of canopy has poor outcomes for the quality of landscaping, biodiversity and urban heat island effects.

Setback distances of just 10 m from the M4 and M7 and multi-storey carparks and buildings closely spaced across the site leave little room for landscaping and inadequate areas of deep soil capable of supporting canopy trees.

Truck movements across the site 24 hours per day pose unacceptable risks of vehicle collisions with fauna in the parklands. A traffic management plan inclusive of protecting fauna from vehicle strike is needed.

The proposed 24 hour lighting poses unacceptable disturbance to fauna in the parklands. Nocturnal lighting impacts should be assessed and managed in line with Commonwealth Dept of Environment and Energy 2020 'Light Pollution Guidelines for Wildlife'.

We have stated this previously and we repeat it here - specifically, under this proposal for Lot 3, the proposed 'realignment' of Eskdale Creek off Lot 3 and into the parklands is not supported for several reasons:

1. The NSW Department of Environment – Water (formerly NRAR) 'Controlled activities guidelines for riparian corridors on waterfront land' do not support disturbance or 'realignments' of 2<sup>nd</sup> order streams (see Table 2 Riparian corridor matrix);
2. Designing for Country guidelines from First Nations people which are to be considered in all State Significant developments do not support disturbance of creeklines;

3. Disturbance of a neighbouring 1<sup>st</sup> order creekline on the other side of Wallgrove Road by the landfill owners has resulted in years of bank slumping, scouring, washout and failed vegetation plantings with poor ecological outcomes and at ongoing cost;
4. Not more than 3km from this site is a parcel of land through which Bungarribee Creek flows. The land is owned by Blacktown Workers Club and a couple of decades ago the Club attempted to do the very same type of creek realignment as is proposed with SSD-49584708 viz to accommodate construction of two warehouses on the land. Understandably, the government of the day rejected the proposal because of the environmental impacts of bulldozing thousands of years of ecological function and profile with respect to the creek.
5. It places the burden of ongoing management, repair and maintenance onto Western Sydney Parklands

There must be someone in the Department of Planning and Environment who has integrity to apply the spirit of environmental protection legislation? There must be someone who will resist 'bending the knee' to the development dollar which regards environmental legislation as something to be skirted around or, worse, a tool to enable environmental destruction?

When Cumberland Plain Woodland was first listed as an "Endangered" ecological community there was estimated to be only 6% cover remaining from what was here before Europeans arrived. That was not sufficient concern to development dollar minded people within society and government. The ecological community was further targeted to the extent that it later had to be listed as "Critically Endangered". Did that alter the destruction and loss? No! In an act which brings disgrace on this generation of public administration, environmental legislation was amended to enable continued loss of the ecological community on the premise that existing conserved land would generate income for itself through offsetting or biobanking as some sort of a compensatory strategy while a net loss occurs elsewhere through 'development' destruction.

It is shameful that public administration does not have the wherewithal to develop an economy through other means rather than a gutless rollover to developer interests and those business people who profit solely from a "Big Australia". All the while the rape of the environment of Western Sydney, the loss of aesthetic values and the hardness of a 'sea' of bitumen, brick and concrete is offered up as the future Cumberland Plain of Sydney.

In much regret over the degenerate Australia of today,



Wayne Olling  
Manager  
Flora & Fauna