

Ingham Property Group Pty Ltd





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Abbreviations

Abbreviation	Description		
AOBV	Areas of Outstanding Biodiversity Value		
BC Act	Biodiversity Conservation Act 2016		
Biodiversity and Conservation SEPP	State Environmental Planning Policy (Biodiversity and Conservation) 2021		
CPW	Cumberland Plain Woodland		
DCCEEW	commonwealth Department of Climate Change, Energy, the Environment and Vater		
DCP	Development Control Plan		
DPE	Department of Planning and Environment (NSW State Government)		
ENV	Existing Native Vegetation		
ELA	Eco Logical Australia Pty Ltd		
EP&A Act	Environmental Planning and Assessment Act 1979		
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999		
EPI	Environmental Planning Instrument		
НВТ	Hollow-bearing tree		
HBV	High Biodiversity Value (Existing Native Vegetation) as mapped in the SEPP – Precincts – Western parkland City 2021 High Biodiversity Values Areas Map		
HTW	High Threat Weeds		
LGA	Local Government Area		
LLS Amendment Act	Local Land Services Amendment Act 2016		
MNES	Matters of National Environmental Significance		
PCT	Plant Community Type		
Precinct Plan	Western Sydney Aerotropolis Precinct Plan (May 2023)		
RFEF	River-flat Eucalypt Forest		
SEPP	State Environmental Planning Policy		
SOFF	Swamp Oak Floodplain Forest		
TEC	Threatened Ecological Community		
Western Parkland City SEPP	State Environmental Planning Policy (Precincts – Western Parkland City) 2021		
WM Act	Water Management Act 2000		
WoNS	Weeds of National Significance		

Executive Summary

This Biodiversity Assessment Report (BAR) has been prepared by Eco Logical Australia Pty Ltd (ELA) for Ingham Property Group Pty Ltd (IPG) to support the proposed Master Plan for 475 Badgerys Creek Road, Bradfield NSW 2556. This report describes the biodiversity values of the impacted land, describes such impacts, and assesses the consistency of the Master Plan with the planning framework. The majority of the subject land is biodiversity certified. Biodiversity certified land requires no further assessment of biodiversity values under the *Biodiversity Conservation Act 2016* (BC Act).

Three Plant Community Types (PCT) are present within the subject land:

- PCT 4023 Coastal Valleys Swamp Oak Riparian Forest (Moderate Condition) Endangered under the BC Act
- PCT 4025 Cumberland Red Gum Riverflat Forest (Low to Moderate Condition) Endangered under the BC Act
- PCT 3320 Cumberland Shale Plains Woodland (Low Condition) Critically Endangered under the BC Act

The majority of the site became certified in 2010 as part of the biodiversity certification of the Sydney Region Growth Centres SEPP. The Aerotropolis Precinct Plan was prepared in 2020, and was supported by a biodiversity assessment. The biodiversity assessment for the Aerotropolis Precinct identified a potential shortfall in Existing Native Vegetation (ENV) within non-certified areas, meaning that the Precinct was unlikely to contribute sufficiently to meeting the 2000 ha for the Sydney Region Growth Centres. In order to meet the 2000 ha target, additional patches of vegetation that met definition of Existing Native Vegetation (ENV) on *certified* land were identified for protection via the Aerotropolis Precinct Plan. These were mapped in the Western Parkland City SEPP as High Biodiversity Value (Existing Native Vegetation).

Despite being biodiversity certified, HBV (ENV) areas in the Western Parkland City SEPP are protected. Consent cannot be granted for removal of HBV (ENV) as they contribute to the overall 2000 ha target for ENV protection in the Sydney Region Growth Centres. The Master Plan proposes the protection of all field validated HBV (ENV).

The removal of HBV is not permitted in accordance with Section 4.25A (2) of the SEPP:

(2) Development consent must not be granted to development on the land unless the consent authority is satisfied that the development will not result in clearing of native vegetation.

A minor encroachment of 104m2 into the HBV(ENV) area in the south of the central riparian corridor will not result in the removal of any native vegetation. Tree Protection Zones were determined by an arborist and retaining walls proposed (instead of batters) to ensure vegetation within the HBV (ENV) areas is not impacted. As the encroachment of the development within the mapped HBV (ENV) area will not result in the direct removal of native vegetation, the Master Plan is considered to be in accordance with the SEPP.

The Master Plan provides open space throughout the central riparian corridor and protection of higher quality native vegetation in the Badgerys Creek and South Creek/Wianamatta riparian corridors. While

the Master Plan open space network differs from the Precinct Plan (44 ha), the proposed approach provides better habitat connectivity through the central riparian corridor and offers 3.15 ha of additional open space.

Mitigation measures have been proposed to address residual impacts to native vegetation and native fauna (including threatened species) that have the potential to occur within the subject land before, during and after construction. The following management plans have also been prepared by ELA to manage impacts to biodiversity before, during and after construction:

- Flora and Fauna Management Plan (FFMP)
- Vegetation Management Plan (VMP)
- Dam Dewatering Plan (DDP)
- Weed Eradication Management Plan (WEMP)
- Wildlife Management Plan, in relation to potential wildlife risk in relation to the nearby Western Sydney Airport.

The above plans have been consolidated into a Biodiversity Management Plan (ELA 2024b). If the recommended mitigation measures are implemented, all vegetated HBV will be retained and protected and impacts to flora and fauna will be appropriately managed.

1. Introduction

This Biodiversity Assessment Report (BAR) has been prepared by Eco Logical Australia Pty Ltd (ELA) for Ingham Property Group Pty Ltd (IPG) for the proposed Master Plan Request for Badgerys Creek. This report describes the biodiversity values and demonstrates consistency or provides an explanation of inconsistencies between the proposed Master Plan and the relevant precinct and development control plans (DCP).

The Master Plan process is provided for under Chapter 4 (Western Sydney Aerotropolis), Section 4.41 of the *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* (Western City Parkland SEPP). The Master Plan must show consistency with the relevant DCP (Western Sydney Aerotropolis Phase 2 DCP), Master Plan Guidelines (DPIE 2021), and the relevant precinct plan (Western Sydney Aerotropolis Precinct Plan, DPE 2023). Where there are inconsistencies with the precinct plan, the proposed Master Plan must provide justification in accordance with the Master Plan Guidelines (DPIE 2021). This report details consistency of these matters with respect to biodiversity values.

1.1. Site Description

The proposed Master Plan Request is located at 475 Badgerys Creek Road, Bradfield, within the Liverpool local government area (LGA). The location of the subject land is shown in Figure 2, and is approximately 15 km west of the Liverpool Central Business District (CBD).

The total subject land is approximately 184 hectares (ha) of pasture-improved exotic grassland, scattered paddock trees, native vegetation, farm dams, built form and has a historical land use for agricultural purposes. The subject land is legally defined as Lots 99 and 100 in DP1287207.

1.2. Master Plan Proposal

The subject land is part of the Aerotropolis Core Precinct within the Western Sydney Aerotropolis and is predominately zoned for ENT (Enterprise) use under the Western City Parkland SEPP (Figure 5).

The subject land comprises a total area of 184 ha along Badgerys Creek Road, strategically located within the heart of the Western Parkland City. The majority of the site is under the ownership of IPG, with a small portion of land earmarked for the North Bradfield Zone Substation owned by Endeavour Energy. The site is largely grass land and is largely clear of vegetation as it is currently used for agricultural purposes. There is an internal road network within the site which had previously connected the now demolished sheds and ancillary structures dispersed across the site.

The subject land is situated within the Western Sydney Aerotropolis, with a direct interface with the Western Sydney International Airport (WSI). It is bound by two significant riparian corridors which define Western Sydney, with South Creek to the east and Badgerys Creek to the north-west. The immediate surroundings of the site are characterised by large rural landholdings used predominately for agricultural and light manufacturing purposes, all of which will redeveloped in accordance with the Aerotropolis Precinct Plan vision.

The IPG Master Plan was informed by a detailed assessment of the site-specific considerations through preliminary site investigations. The Master Plan breaks down the general application of the Enterprise zone across the site and provides a more granular approach to land use planning with considerations made to the opportunities and constraints of the site. The structure plan is made up of four key land uses which include enterprise and light industry, business and enterprise, and employment zone centres.

This EAR has been prepared by ELA to inform the assessment of the Master Plan and support the TAP co-design process.

1.3. Terms used in this report

1.3.1. Subject land

The subject land is presented as a solid red border and defined in Figure 2. This refers to the entire landholding subject to the Master Plan, within the property boundary Lots 99 and 100 in DP1287207.

1.3.2. Development Layout

The 'development layout' is presented in Figure 2 and defines the specific lot, road and batter works proposed under the Master Plan. The Master Plan layout is also provided in Figure 3.

1.3.3. Proposed Master Plan open space

As defined in Figure 4, 'open space' refers to the areas proposed under the Master Plan for a range of environmental and recreation uses including protection, passive and active recreation, and stormwater infrastructure such as basins. These areas contribute to the total pervious area of the subject land. Open space within riparian corridors will be revegetated, subject to the Vegetation Management Plan (VMP) prepared by ELA.

The proposed open space or retained areas are majority biodiversity certified, excluding the eastern panhandle contained the major riparian corridor, South Creek/Wianamatta (Figure 4).

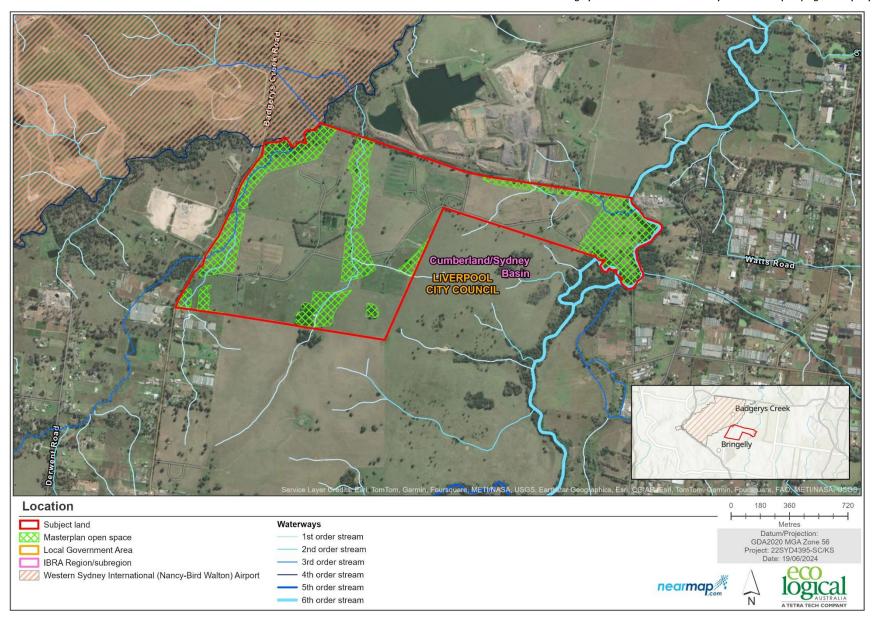


Figure 1 Location of the subject land

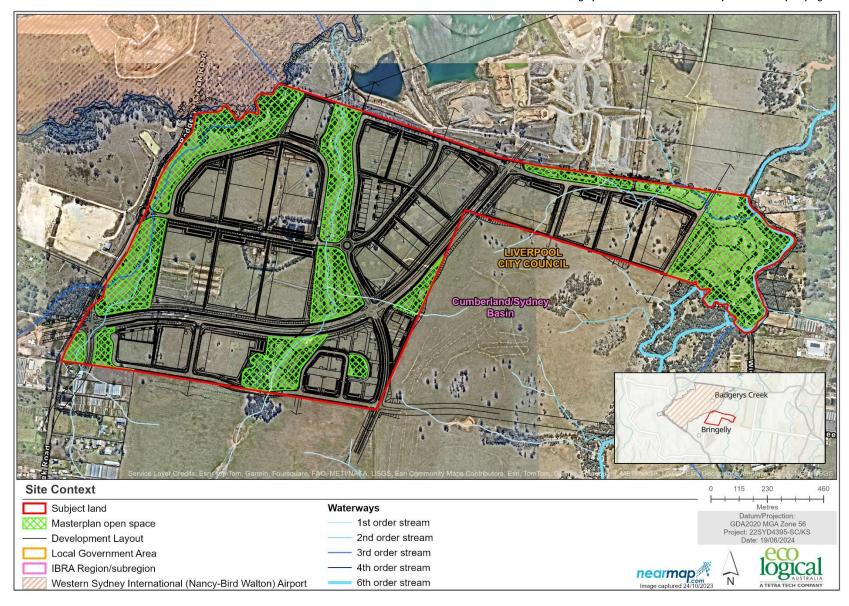


Figure 2 Site context showing development layout



Figure 3 Proposed Master Plan layout (IPG Public Domain Landscape Strategy, Site Image 2024)

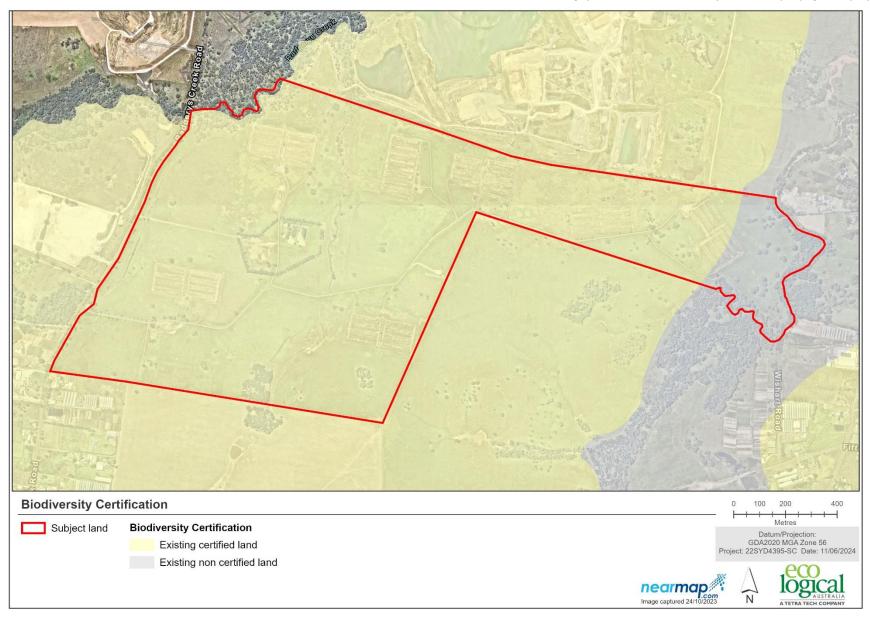


Figure 4 Biodiversity certification

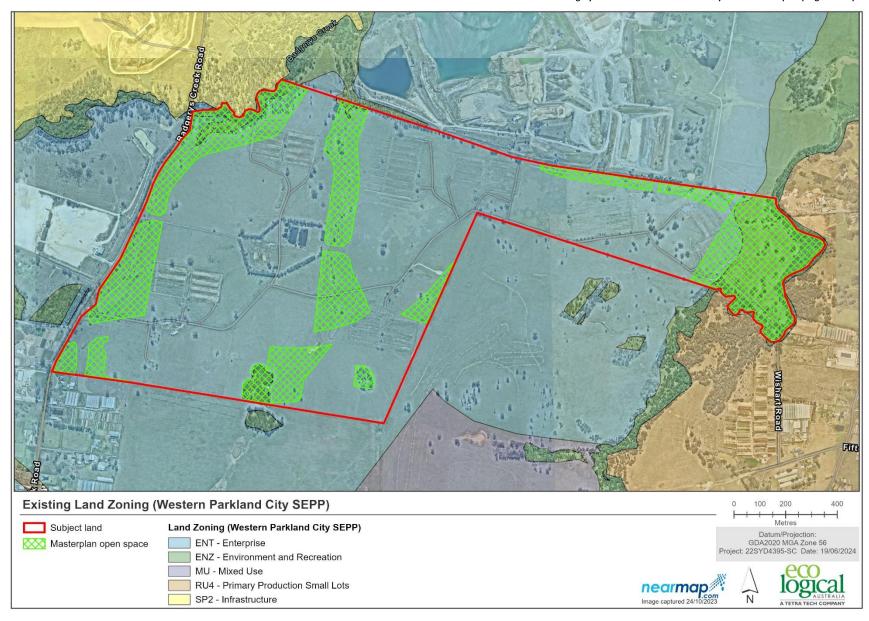


Figure 5 Land zoning



Figure 6 High Biodiversity Value (Existing Native Vegetation) from the Western Parkland City SEPP

2. Statutory Framework

2.1. Commonwealth Legislation

Table 1 Commonwealth legislative context

Relevance to Project Environmental The EPBC Act establishes a regime for assessing and regulating the environmental impact of activities (including development) where a Matters of National Environmental Significance Protection and **Biodiversity** (MNES) may be affected. Under the EPBC Act, any action which has, will have, or is likely to have Conservation Act a significant impact on a matter of MNES is defined as a "controlled action", and requires 1999 approval from the Minister. (EPBC Act) On 28th February 2012, the Commonwealth Minister for the Environment announced that the program of development activities within the Growth Centres was approved under the EPBC Act Strategic Assessment process. Specifically, all actions associated with the development of the Western Sydney Growth Centres as described in the Sydney Growth Centres Strategic Assessment Program Report (November 2010) have been assessed at the strategic level and approved in regard to their impact on the following MNES: **World Heritage Properties**

- National Heritage Places
- Wetlands of International Importance
- Listed threatened species and communities
- Listed migratory species

These decisions indicate that the Commonwealth is satisfied that the conservation and development outcomes that will be achieved through the Western Sydney Growth Centres Program will satisfy their requirements for environmental protection under the EPBC Act. Provided that development activity proceeds in accordance with the Growth Centres requirements (such as the Biodiversity Certification Order, State Environmental Planning Policy (Precincts - Western Parkland City) 2021, Western Sydney Aerotropolis Development Control Plan (DCP) Phase 2, Growth Centres Development Code etc.) there is no requirement to assess the impact of development activities on MNES within the Growth Centres and no requirement for referral of activities to the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW).

The subject land is therefore exempt from further assessment of threatened species and endangered ecological communities listed under either the NSW BC Act or Commonwealth EPBC Act if the Master Plan is approved and undertaken in accordance with the relevant requirements.

Where habitat for native fauna is to be removed, regardless of biodiversity certification, the works should be done in such a manner that minimises the risk of injury or death to native fauna in accordance with the relevant management plans.

2.2. NSW State Legislation

Table 2 State legislative context

Act	Relevance to Project
Environmental Planning and Assessment Act 1979 (EP&A Act)	The EP&A Act is the principal planning legislation for NSW. It provides a framework for the overall environmental planning and assessment of development proposals. In relation to the Master Plan request, Part 3 Division 3.3 of the EP&A Act stipulates the framework for preparing a State Environmental Planning Policy (SEPP).
Biodiversity Conservation Act 2016	The subject land is located on land that is majority biodiversity certified under section 8.2 of the BC Act (Figure 4). Biodiversity certification removes the need for biodiversity assessment under

Act	Relevance to Project
(BC Act)	BC Act. The impact area is currently entirely biodiversity certified, however it is noted that the intention of HBV (ENV) under the Western parkland City SEPP is for these areas to become non-certified land at some point in the future for protection.
	This report has been prepared to provide evidence of biodiversity certification and provide an assessment of biodiversity values in the non-certified portions of land and High Biodiversity Value (Existing Native Vegetation) areas.
Local Land Services Amendment Act 2016 (LLS Amendment Act)	The LLS Amendment Act does not apply to the subject land. In accordance with Section 600, the clearing of any native vegetation has been authorised by biodiversity certification enacted under the BC Act.
Conveyancing Act 1919 (Conveyancing Act)	Part 6 (Covenants and powers), Division 4 Section 88 of the Conveyancing Act contains provisions for 'Requirements for easements and restrictions on use of land'. A Section 88 instrument will apply to the patch of HBV located in the south of the study area, being the stand of Casuarina glauca associated with PCT 4023, to protect this vegetation in perpetuity upon registration of the plan it is to be located within ('Lot 4') Similarly, if required, a Section 88 instrument would also be applied to a small portion of HBV in the north of the subject land associated with PCT 4025, to protect this land upon its registration as a new plan ('Lot 11'). However, it is noted that this patch is not validated HBV and therefore does not contain any native vegetation.

2.3. Environmental Planning Instruments (EPIs)

Table 3 EPIs relevant to the proposal

Planning Instrument	Relevance to Project
State Environmental Planning Policy (Biodiversity and Conservation) 2021 Biodiversity and Conservation SEPP	Strategic Conservation Planning The subject land is within the Cumberland Plain Conservation (CPCP) Area, for which controls are provided under Chapter 13 of the Biodiversity and Conservation SEPP. However, the subject land is not identified as any of the CPCP land categories and is not classified as 'Excluded' or 'Avoided' under the CPCP. As such, consideration of Chapter 13 is not required. Koala Habitat Protection In accordance with Schedule 2 of the Biodiversity and Conservation SEPP, Chapter 4 Koala Habitat Protection 2021 applies to the local government area (LGA) of Liverpool. The City of Liverpool corresponds to the Central Coast Koala Management Area (KMA). Consideration of koala habitat has been provided in Section 4.2.
State Environmental Planning Policy (Precincts – Western Parkland City) 2021 Western Parkland City SEPP	Chapter 4 – Western Sydney Aerotropolis Master Plan Part 4.7 of the SEPP details the mechanism used to initiate the Master Plan process in the Aerotropolis. The SEPP requires that a Master Plan shows consistency with a DCP, precinct plan, and/or inconsistencies are in accordance with the Master Plan guidelines (DPIE 2021). The Master Plan must be published on the NSW planning portal for at least 28 days prior to its approval. Consistency with the precinct plan is discussed below and in Section 4.3.3, and consistency with the DCP is discussed in Section 4.4. Land Zoning The following land use zones, apply to the impact area under Chapter 4 of the SEPP (Figure 5): • ENT – Enterprise • ENZ – Environment and Recreation The objectives of each land use zone are as described below. ENT Enterprise

Planning Instrument

Relevance to Project

- To encourage employment and businesses related to professional services, high technology, aviation, logistics, food production and processing, health, education and creative industries.
- To provide a range of employment uses (including aerospace and defence industries) that are compatible with future technology and work arrangements.
- To encourage development that promotes the efficient use of resources, through waste minimisation, recycling and re-use.
- To ensure an appropriate transition from non-urban land uses and environmental conservation areas in surrounding areas to employment uses in the zone.
- To prevent development that is not compatible with or that may detract from the future commercial uses of the land.
- To provide facilities and services to meet the needs of businesses and workers.

ENZ Environment and Recreation

- To protect, manage and restore areas of high ecological, scientific, cultural or aesthetic values
- To protect the ecological, scenic and recreation values of waterways, including Wianamatta–South Creek and its tributaries.
- To provide a range of recreational settings and activities and compatible land uses.
- To protect and conserve the environment, including threatened and other species of native fauna and flora and their habitats, areas of high biodiversity significance and ecological communities.

The proposed development primarily avoids ENZ zoned land, by incorporating this zoning into the proposed Master Plan open space. In the north of the subject land a small encroachment into ENZ occurs, however this area does not contain native vegetation.

In the south of the subject land, zoned ENZ will also be slightly impacted. The area of encroachment is previously cleared land, and does not contain native vegetation. Overall, the objectives of ENZ to protect and conserve the environment are not compromised by the minor encroachments into cleared land zoned as ENZ.

Part 4.4 Development Controls – general

Section 4.25 of Part 4.4 provides development controls for the ENZ zone and areas mapped as HBV. It states that a person must not clear native vegetation on ENZ or HBV (ENV) land without development consent, and that consent must not be granted unless the consent authority is satisfied that –

- (a) there is no reasonable alternative available to the disturbance of the native vegetation,
- (b) any impact of the proposed clearing on biodiversity values is avoided or minimised, and
- (c) the disturbance of the native vegetation will not increase salinity, and
- (d) native vegetation inadvertently disturbed for the purposes of construction will be reinstated where possible on completion of construction, and
- (e) the loss of remnant native vegetation caused by the disturbance will be compensated by revegetation on or near the land to avoid a net loss of remnant native vegetation, and
- (f) the clearing of the vegetation is unlikely to cause or increase soil erosion, salination, land slip, flooding, pollution or other adverse land or water impacts.

The Master Plan does not involve clearing of any native vegetation that is mapped as HBV (ENV). The impact area encroaches into mapped HBV in the south of the subject land, where it was field validated as exotic grassland.

Section 4.25(A) of the SEPP Is it noted that in accordance with Section 4.25(5), development for the following purposes is prohibited on land shown as "high biodiversity value" on the High Biodiversity Value Areas Map—

Planning Instrument (a) information and education facilities, (b) kiosks, (c) recreation areas other than a public park, reserve or garden, (d) recreation facilities (outdoor).

Western Sydney
Aerotropolis Precinct
Plan (Amendment 1 –
May 2023)

(Precinct Plan)

The Precinct Plan is created under the Western Parkland City SEPP and provides direction for development layouts within the Aerotropolis. This Precinct Plan establishes the strategic vision and general objectives, proposed land uses, performance criteria for development of land and the approach to both infrastructure and water cycle management among other factors.

In relation to biodiversity, the Precinct Plan requires the visions of the Western Parkland City to be met. It states that:

all the Aerotropolis Core Precinct is subject to precinct planning requirements of the Order to confer biodiversity certification on the State Environmental Planning Policy (Sydney Region Growth Centres) 2006. The Relevant Biodiversity Measures include a requirement to protect 2,000 hectares of Existing Native Vegetation (ENV) in the Growth Centres. 67.31 hectares of ENV Validated land needs to be protected within land subject to this Precinct Plan.

The subject land contains 5.13 ha of HBV, which is the equivalent of ENV for the Aerotropolis. Of this, field validation found that only 4.59 ha of the mapped HBV is vegetated (i.e., is validated HBV). The Master Plan proposes to retain and protect <u>all</u> validated vegetation within the HBV (ENV) mapped areas. A total of 5.08 ha of mapped HBV (including the 4.59 ha of validated HBV) will be protected by the Master Plan.

A small area (0.01ha) of HBV (ENV) area, which does not contain native vegetation, will be affected by the Master Plan in the south (

Figure 11). This is permissible under the SEPP considering Part 4.4 Clause 4.25A (2):

Development consent must not be granted to development on the land unless the consent authority is satisfied that the development will not result in clearing of native vegetation.

Impacts to mapped HBV (ENV) areas will not result in the clearing of native vegetation.

In addition, the Precinct Plan requires:

- The protection of areas of high biodiversity value including watercourses and riparian zones, Existing Native Vegetation and remnant vegetation and habitat of the Cumberland Plain.
- Increase and improve landscape connectivity through conservation and restoration of native vegetation to enable plant and animal communities to survive in the long term.
- Support long-term viability and ecological connectivity by ensuring development does not encroach on protected land.

Discussion of the masterplan in relation to the requirements of the Precinct Plan are presented in Section 4.3.3.

3. Biodiversity Values

3.1. Landscape Features

The subject land is within the Sydney Basin region under the Interim Biogeographic Regionalisation for Australia (IBRA) classification, within the Cumberland IBRA subregion. Under the NSW Mitchell landscapes classification, the subject land is underlain by Cumberland Plain and Hawkesbury-Nepean Channels and Floodplains.

DPI Strahler order mapping (Figure 2) showed six unnamed first order streams, three second order streams, and two third order streams present within the subject land. One fourth order watercourse (Badgerys Creek) occurs in the northwest corner of the subject land but is largely outside of the subject land. A sixth order stream, South Creek/Wianamatta, was identified in the eastern riparian corridor of the subject land. Both Badgerys Creek and South Creek only intersect with the subject land in small sections however the associated vegetated riparian zones (VRZs) clearly extend into the subject land. A riparian assessment has been completed by ELA in a separate report.

Several farm dams are present within the subject land totalling an area of 1.37 ha. These dams have limited riparian or fringing vegetation and poor aquatic habitat values as they are primarily utilised for irrigation purposes of the existing or previous agricultural land use. Some *Casuarina glauca* was present around the cluster of farm dams in the centre of the subject land, while groundcover was dominated by exotic Kikuyu grass with some native *Typha orientalis* (Bulrush). This vegetation did not meet the definition of a native PCT. One empty farm dam was present adjacent to the larger cluster and was dominated by exotic groundcover. Another dam was present in the east of the subject land and contained low water levels and little vegetation. A Dam Dewatering Plan (DDP) has been prepared by ELA to manage the removal of farm dams.

The impact area does not contain any Areas of Outstanding Biodiversity Value (AOBV) (DPE 2022). Vegetation associated with the Badgerys Creek and South Creek riparian corridors, in the west and east of the subject land respectively, are mapped under the Biodiversity Values (BV) Map.

3.2. Vegetation Validation

ELA Senior Ecologist Stacey Wilson completed preliminary survey of vegetation communities on site on 8 November 2022, which identified Plant Community Type (PCT) 835 *Cumberland Riverflat Forest* in varying conditions across the subject land. PCT numbers and classification have since been updated, with the decommissioned number PCT 835 in the east and western corners of the subject land now conforming to the updated classification, PCT 4025 *Cumberland Red Gum Riverflat Forest*.

A second field survey was undertaken on 4 April 2023, by ELA Ecologist Michael Gregor and Alexis Gerasimou. The survey in the three vegetation clusters identified three PCTs in different broad condition states. Further details on each vegetation patch are provided below.

3.2.1. Plant Community Types (PCTs)

The PCTs identified and their broad condition states within the impact area are:

• PCT 3320: Cumberland Shale Plains Woodland (low condition)

- PCT 4023: Coastal Valleys Swamp Oak Riparian Forest (moderate condition)
- PCT 4025: Cumberland Red Gum Riverflat Forest (low and moderate condition)

PCT 4025 is listed as a threatened ecological community (TEC) under the BC Act and EPBC Act, River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria.

PCT 3320 is also listed as a TEC under the EPBC Act, *Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest*. However, the patches on the subject land did not meet the minimum condition threshold to meet the TEC listing under the EPBC Act as described in Table 4.

Being located within the Sydney Region Growth Centres, no further assessment under the EPBC Act is required as described in Section 5 if the Master Plan is deemed to be consistent with the activities and various requirements of the growth centres. No further assessment under the BC Act is required for biodiversity certified land.

3.2.2. Additional High Conservation Value Vegetation (AHCVV)

Within the study area, ELA identified patches of PCT 4025 within the subject land that meets two out of the three criteria for Existing Native Vegetation (ENV), however were not mapped as HBV under the Western Parkland City SEPP. In other Growth Centres ecological assessments, such vegetation was classified as 'Additional High Conservation Value Vegetation' (AHCVV). The vegetation has a canopy cover of at least 10% and is in a patch size of more than 0.5 ha.

The AHCVV identified within the study area is presented in Figure 8. All AHCVV is within the Master Plan open space areas along the Badgerys Creek and Wianamatta/South Creek riparian corridors. It will be managed under a VMP (ELA 2024a), being within the VMP boundary (Figure 8).

The total area of field-validated AHCVV identified within the subject land is 4.14 ha (Figure 8).

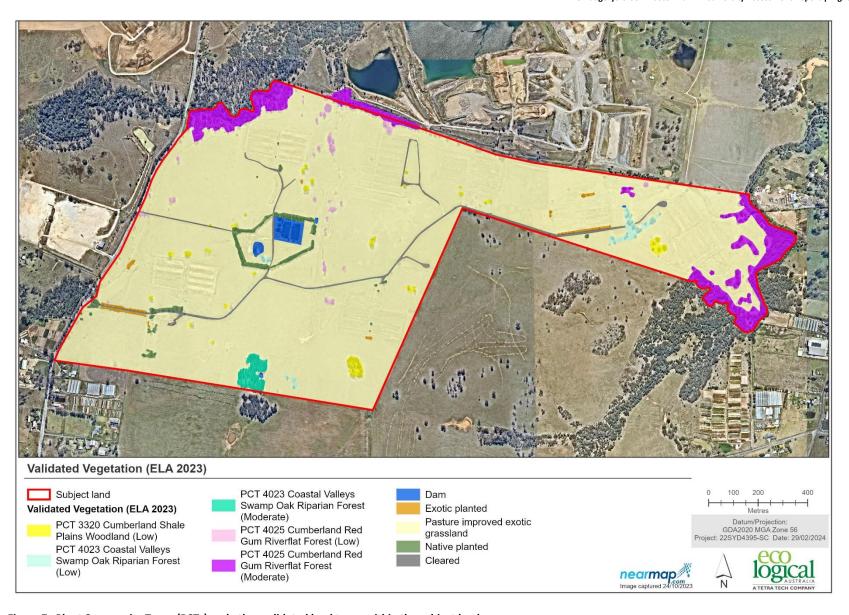


Figure 7 Plant Community Types (PCTs) and other validated land types within the subject land

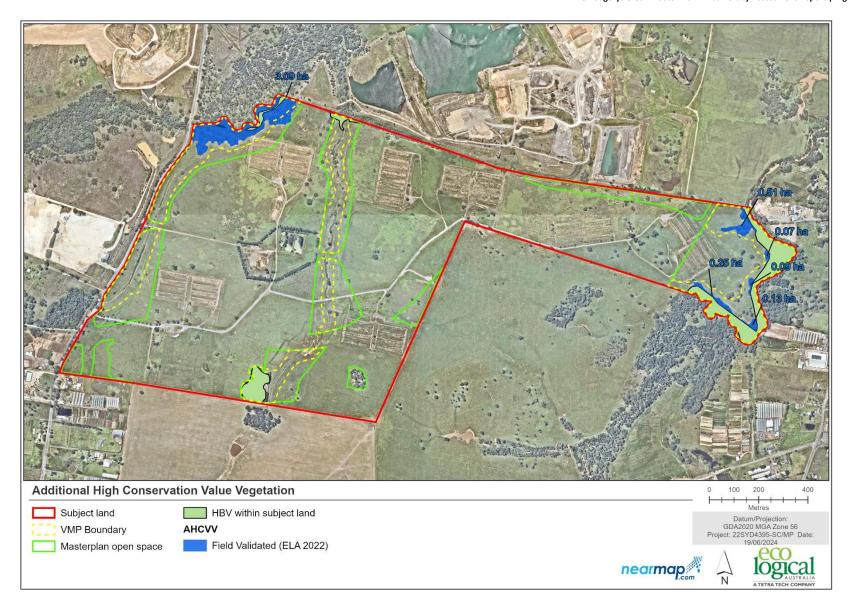


Figure 8 Additional High Conservation Value Vegetation (AHCVV)

3.2.3. Vegetation Descriptions

Table 4 PCT 3320 (Low) vegetation description

PCT 3320: Cumberland Shale Plains Woodland (Low)

Associated TEC(s) Cumberlar

Cumberland Plain Woodland in the Sydney Basin Bioregion (BC Act)

Vegetation Description

PCT 3320 (Low) was present as a small patch in south east of the subject land as isolated paddock trees throughout the higher elevation areas of the subject land. In the small patch the canopy consisted of native *Eucalyptus tereticornis* (Forest Red Gum) and *Eucalyptus moluccana* (Grey Box). The midstorey was absent. The groundcover was dominated by weed species (> 70% cover) including *Cenchrus clandestinus* (Kikuyu), *Polygonum aviculare* (Wireweed), *Stellaria media* (Chickweed), *Lepidium africanum* (Common Peppercress), *Cirisium vulgare* (Scotch Thistle), *Sida rhombifolia* (Paddy's Lucerne), *Verbena bonariensis* (Purpletop) and *Plantago lanceolata* (Lamb's Tongues). The native species present (< 5% cover) included *Microlaena stipoides* var. *stipoides* (Weeping Grass), *Einadia trigonos* subsp. *stellulata* and *Portulaca oleracea* (Pigweed).

The paddock tree canopy consisted of either a single *Eucalyptus tereticornis* (Forest Red Gum) or *Eucalyptus moluccana* (Grey Box). The midstorey was absent. The groundcover was entirely exotic with pasture improved species including *Cenchrus clandestinus* (Kikuyu), *Chloris gayana* (Rhodes Grass), *Paspalum dilatatum* (Paspalum), *Plantago lanceolata* (Lamb's Tongues), *Sida rhombifolia* (Paddy's Lucerne) and *Echinochloa* spp.

BC Act

The occurrence of PCT 3320 (Low) within the subject land met the Final Determination definition of Cumberland Plain Woodland in the Sydney Basin Bioregion (NSW Scientific Committee 2014) for the following reasons:

- The patches occur at around 71 m elevation, which is within the described range of up to 350 m
- The landform pattern where the patches are found matches that described in the Final Determination of *flat to undulating* or *hilly terrain*
- The species composition within all strata of the patches overlaps well with the assemblage of species detailed in the Final Determination as being characteristic of CPW.

EPBC Act

This PCT is also associated with the federally listed community Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (EPBC Act). Under the EPBC Act, a patch of vegetation must meet condition thresholds for it to be considered CPW. These criteria are based on the percent cover of native canopy and ground layer as well as the patch size. The patches mapped as PCT 3320 (Low) within the subject land did not meet the patch size criteria (> 0.5 ha) and therefore did not represent Cumberland Plain Woodland as defined by the EPBC Act.



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Table 5 PCT 4023 (Moderate) vegetation description

PCT 4023: Coastal Valleys Swamp Oak Riparian Forest (Moderate)

Associated TEC(s)

Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions (BC Act)

Vegetation Description

PCT 4023 (moderate) was present as a small patch in the southern area of the subject land. The canopy consisted of native *Casuarina glauca* (Swamp Oak), which were identified as regrowth in the ELA 2022 vegetation validation survey. The midstorey was absent. The groundcover was dominated by weed species (>70% cover) including *Cenchrus clandestinus* (Kikuyu), *Polygonum aviculare* (Wireweed), *Stellaria media* (Chickweed), *Lepidium africanum* (Common Peppercress), *Cirisium vulgare* (Scotch Thistle), *Sida rhombifolia* (Paddy's Lucerne), *Verbena bonariensis* (Purpletop) and *Plantago lanceolata* (Lamb's Tongues). The native species present (< 5% cover) included *Microlaena stipoides* var. *stipoides* (Weeping Grass), *Einadia trigonos* subsp. *stellulata* and *Portulaca oleracea* (Pigweed).

BC Act

The Final Determination for *Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions* (SOFF), listed as endangered under the BC Act, provides additional information to aid recognition of this community. The occurrence of PCT 4023 (Moderate) within the subject land meet the Final Determination definition of SOFF (NSW Scientific Committee 2012) for the following reasons:

- Occurs within the Sydney Basin with one of the recognised forms of open woodland.
- The landform pattern where the patches are found matches that described in the Final Determination of *drainage lines* or *inundated flats*
- The species composition within all strata of the patches overlaps well with the assemblage of species detailed in the Final Determination as being characteristic of SOFF.

EPBC Act

This PCT is also associated with the Commonwealth listed community 'Coastal Swamp Oak (*Casuarina glauca*) Forest of New South Wales and South East Queensland' ecological community under the EPBC Act. For listing under the EPBC Act, a patch of vegetation must meet key diagnostics and condition thresholds for it to be considered the Coastal Swamp Oak Forest.

These criteria are based on the percent cover of native canopy and ground layer as well as the patch size. The patches mapped as PCT 4023 (Moderate) within the subject land did not meet the condition threshold for EPBC listing. Despite meeting the small patch size criteria, they didn't meet the native understory vegetation cover, therefore, did not represent the TEC listing for Coastal Swamp Oak Forest as defined by the EPBC Act.



PCT 4023: Coastal Valleys Swamp Oak Riparian Forest (Moderate)



Table 6 PCT 4023 (Low) vegetation description

PCT 4023: Coastal Valleys Swamp Oak Riparian Forest (Low)

Associated TEC(s)

Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions (BC Act)

Vegetation Description

PCT 4023 (low) was present as a small patch in the southern area of the subject land. The canopy consisted of native *Casuarina glauca* (Swamp Oak). The midstorey was absent. The groundcover was entirely exotic with pasture improved species including *Cenchrus clandestinus* (Kikuyu), *Chloris gayana* (Rhodes Grass), *Paspalum dilatatum* (Paspalum), *Plantago lanceolata* (Lamb's Tongues), *Sida rhombifolia* (Paddy's Lucerne) and *Echinochloa* spp.

BC Act

The Final Determination for Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions (BC Act) provides additional information to aid recognition of this community. The occurrence of PCT 4023 (Low) within the subject land meet the Final Determination definition of SOFF (NSW Scientific Committee 2012) for the following reasons:

- Occurs within the Sydney Basin with one of the recognised forms of open woodland.
- The landform pattern where the patches are found matches that described in the Final Determination of *drainage lines* or *inundated flats*
- The species composition within all strata of the patches overlaps well with the assemblage of species detailed in the Final Determination as being characteristic of SOFF.

EBPC Act

This PCT is also associated with the federally listed community Coastal Swamp Oak (*Casuarina glauca*) Forest of New South Wales and South East Queensland ecological community (EPBC Act). Under the EPBC Act, a patch of vegetation must meet key diagnostics and condition thresholds for it to be considered the Coastal Swamp Oak Forest.

These criteria are based on the percent cover of native canopy and ground layer as well as the patch size. The patches mapped as PCT 4023 (low) within the subject land did not meet the condition threshold for EPBC listing due to not meeting the small patch size criteria, therefore, did not represent the Endangered Swamp Oak Forest, as defined by the EPBC Act.



Table 7 PCT 4025 (Moderate) vegetation description

PCT 4025: Cumberland Red Gum River-Flat Forest (Moderate)

Associated TEC(s)

River-Flat Eucalyptus Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions (BC Act)

River-Flat Eucalyptus Forest on Coastal Floodplains of Southern New South Wales and Eastern Victoria (EPBC Act)

PCT 4025: Cumberland Red Gum River-Flat Forest (Moderate)

Vegetation Description

PCT 4025 (Moderate) was present as a small patch in northern area just outside the boundary of the subject land. The canopy species present included *Angophora subvelutina* (Broadleaved Apple), *Eucalyptus tereticornis* (Forest Red Gum) and *Eucalyptus moluccana* (Grey Box). A native midstory was present and included *Bursaria spinosa* subsp. *spinosa* (Native Blackthorn) and regenerating *Eucalyptus* spp. The understorey was mixed native and exotic, the native species present includes *Microlaena stipodies* var. *stipodies* (Weeping Grass), *Glycine microphylla* (Small-leaf Glycine) *Dichondra repens* (Kidney Weed) and *Juncus usitatus* (Common Rush), however is mostly dominated by exotic species including *Tradescantia fluminensis* (Trad), *Cirsium vulgare* (Spear Thistle), *Lolium perenne* (Perennial ryegrass), *Sida rhombifolia* (Paddy's Lucerne), *Solanum* spp., and exotic vines, *Anredera cordifolia* (Madeira Vine) and *Araujia sericifera* (Moth Vine).

Cumberland Riverflat Forest was mapped in a low to moderate condition in the northwest (associated with the Badgerys Creek riparian corridor) and east (South Creek corridor) of the site. The eastern portion of the site contained remnant canopy species approximately 30 -40 m from the riparian corridor. These species include *Angophora subvelutina* (Broad-leaved Apple) and *Eucalyptus tereticornis* (Forest Red Gum). The northwest portion of the site also contained *E. tereticornis* and *Eucalyptus moluccana* (Grey Box) and *Eucalyptus eugenioides* (Thin-leaved Stringybark) and a sub-canopy of *Casuarina glauca* (Swamp Oak) and *Melaleuca decora* (White Feather Honey Myrtle). A native midstorey is present and includes *Bursaria spinosa* subsp. *spinosa* (Native Blackthorn) and regenerating *Eucalyptus* spp.

The understorey includes a small presence of native species including *Microlaena stipodies* var. *stipodies* (Weeping Grass), *Glycine microphylla* (Small-leaf Glycine), *Dichondra repens* (Kidney Weed) and *Juncus usitatus* (Common Rush), however is mostly dominated by exotic species including *Tradescantia fluminensis* (Trad), *Cirsium vulgare* (Spear Thistle), *Lolium perenne* (Perennial ryegrass), *Sida rhombifolia* (Paddy's Lucerne), *Solanum* spp., and exotic vines, *Anredera cordifolia* (Madeira Vine) and *Araujia sericifera* (Moth Vine).

BC Act

The Final Determination for *River-Flat Eucalyptus Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions* (RFEF) listed as endangered under the BC Act provides additional information to aid recognition of this community. The occurrence of PCT 4025 (Moderate) within the subject land meet the Final Determination definition of RFEF (NSW Scientific Committee 2012) for the following reasons:

- Occurs within the Sydney Basin with one of the recognised forms of open woodland and within the elevation range of 50 m 250 m.
- The landform pattern where the patches are found matches that described in the Final Determination of alluvial flats, river terraces, drainage lines or inundated flats
- The species composition within all strata of the patches overlaps well with the assemblage of species detailed in the Final Determination as being characteristic of RFEF.

EPBC Act

This PCT is also associated with the federally listed community *River-Flat Eucalyptus Forest on Coastal Floodplains of Southern New South Wales and Eastern Victoria* (EPBC Act). This community is listed as critically endangered under the EPBC act. Under the EPBC Act, a patch of vegetation must meet key diagnostics and condition thresholds for it to be considered the River-flat Eucalyptus Forest.

These criteria are based on the percent cover of native canopy and ground layer as well as the patch size. The patches mapped as PCT 4025 (Moderate) within the subject land met the condition criteria of Moderate Condition – Class C2, therefore met the requirements for EPBC listing. No further assessment under the EPBC Act is required due to the subject land being located and carried out in accordance with the Sydney Region Growth Centres (see Section 5).

PCT 4025: Cumberland Red Gum River-Flat Forest (Moderate)



Table 8 PCT 4025 (Low) vegetation description

PCT 4025: Cumberland Red Gum Riverflat Forest (Low)

Associated TEC(s)

River-Flat Eucalyptus Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions (BC Act)

River-Flat Eucalyptus Forest on Coastal Floodplains of Southern New South Wales and Eastern Victoria (EPBC Act)

Vegetation Description

PCT 4025 (Moderate) was present as a small patches along the degraded drainage lines throughout the subject land. The canopy species present included either *Angophora subvelutina* (Broad-leaved Apple), *Eucalyptus tereticornis* (Forest Red Gum) and *Eucalyptus moluccana* (Grey Box) or *Eucalyptus amplifolia* (Cabbage Gum). The midstory was absent. The groundcover was entirely exotic with pasture improved species including *Cenchrus clandestinus* (Kikuyu), *Chloris gayana* (Rhodes Grass), *Paspalum dilatatum* (Paspalum), *Plantago lanceolata* (Lamb's Tongues), *Sida rhombifolia* (Paddy's Lucerne) and *Echinochloa* spp.

BC Act

The Final Determination for *River-Flat Eucalyptus Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions* (BC Act) provides additional information to aid recognition of this community. The occurrence of PCT 4025 (Moderate) within the subject land met the Final Determination definition of RFEF (NSW Scientific Committee 2012) for the following reasons:

- Occurs within the Sydney Basin with one of the recognised forms of open woodland and within the elevation range of 50 m – 250 m.
- The landform pattern where the patches are found matches that described in the Final Determination of *alluvial flats, river terraces, drainage lines* or *inundated flats*

The species composition within all strata of the patches overlaps well with the assemblage of species detailed in the Final Determination as being characteristic of RFEF.

EPBC Act

This PCT is also associated with the federally listed community *River-Flat Eucalyptus Forest on Coastal Floodplains of Southern New South Wales and Eastern Victoria* (EPBC Act). Under the EPBC Act, a patch of vegetation must meet key diagnostics and condition thresholds for it to be considered the critically endangered River-flat Eucalyptus Forest under the EPBC Act.

These criteria are based on the percent cover of native canopy and ground layer as well as the patch size. The patches mapped as PCT 4025 (low) within the study did <u>not</u> meet the patch size criteria (> 0.5 ha) and therefore did not represent River-Flat Eucalyptus Forest, as defined by the EPBC Act.

PCT 4025: Cumberland Red Gum Riverflat Forest (Low)



Table 9 Native Planted vegetation description

Native Planted	
Native Fiancea	
Associated TEC(s)	N/A
Conservation Status	N/A
Vegetation Description	The Native Planted vegetation zone was located along the roads and on the exterior of the previous buildings. This included rows of <i>Callistemon citrinus</i> (Crimson Bottlebrush), <i>Corymbia citriodora</i> (Lemon-scented Gum), <i>Casuarina glauca</i> (Swamp Oak), <i>Eucalyptus robusta</i> (Swamp Mahogany). These areas had an exotic groundcover layering including <i>Cenchrus clandestinus</i> (Kikuyu), <i>Chloris gayana</i> (Rhodes Grass), <i>Paspalum dilatatum</i> (Paspalum), <i>Plantago lanceolata</i> (Lamb's Tongues), <i>Sida rhombifolia</i> (Paddy's Lucerne) and <i>Echinochloa</i> spp.
BC Act	N/A
EPBC Act	N/A

Native Planted

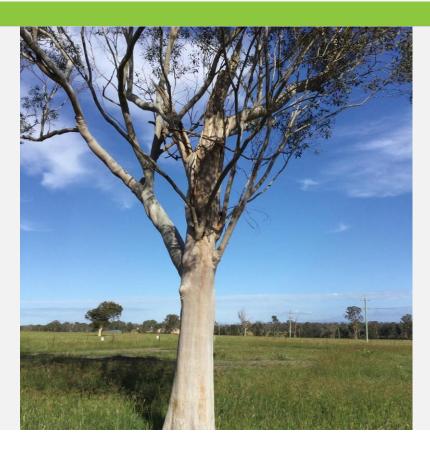


Table 10 Grassland, exotic planted and cleared vegetation/land type description

Pasture improved exotic grassland / Exotic planted / Cleared

Associated TEC(s) N/A

Conservation Status N/A

Vegetation Description
The Exotic vegetation zone includes the exotic vegetation planted along the roads and on the

exterior of the previous building sites and within the paddocks. The exotic grassland areas included *Cenchrus clandestinus* (Kikuyu), *Sporobolus fertilis* (Giant Parramatta Grass) *Chloris gayana* (Rhodes Grass), *Paspalum dilatatum* (Paspalum), *Plantago lanceolata* (Lamb's Tongue),

Sida rhombifolia (Paddy's Lucerne) and Echinochloa spp.

BC Act N/A

EPBC Act N/A



3.2.4. Weeds

The *Biosecurity Act 2015* (Biosecurity Act) and regulations provide specific legal requirements for state level priority weeds (Table 11). Under the BA Act all 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.

Specific legal requirements apply to State determined priorities under the *Greater Sydney Regional Strategic Weed Management Plan 2017-2022*, while Regional priorities include outcomes to demonstrate compliance with the general biosecurity duty and strategical responses in the region to achieve relevant management objectives (Great Sydney Local Land Services 2017). Weeds listed as 'other weeds of regional concern' under the plan warrant resources for local control or management programs and are a priority to keep out of the region. Inclusion in this list may assist Local Control Authorities and/or land managers to prioritise action in certain circumstances where it can be demonstrated the weed poses a threat to the environment, human health, agriculture etc. Of the weeds identified during the field survey, seven have been listed as State level priority weeds.

A total of seven Priority Weeds, including four Weeds of National Significance (WoNS) were identified in the subject land, summarised in Table 11 below. An additional nine other weeds of regional concern were also identified. A Weed Eradication Management Plan (WEMP) has been prepared as part of the BMP (ELA 2024b) to prevent the spread or introduction of weeds.

Table 11 A list of priority weeds and WoNS identified within the subject land

Scientific Name	Common Name	WoNS	Priority Weed Category
Anredera cordifolia	Madeira Vine	WoNS	State priority - Asset Protection
Araujia sericifera	Moth Vine	-	Environment
Asparagus asparagoides	Bridal Creeper	WoNS	State priority – Asset Protection
Cestrum parqui	Green Cestrum	-	Regional Priority Weed - Asset Protection
Cirsium vulgare	Spear Thistle	-	Environment
Conyza sp.	Fleabane	-	Environment
Cortaderia jubata	Pampas Grass	-	Asset Protection
Cyperus eragrostis	Umbrella sedge	-	Environment
Eragrostis curvula	African Lovegrass	-	Asset Protection
Ligustrum sinense	Chinese Privet	-	Containment
Lycium ferocissimum	African Boxthorn	WoNS	State priority - Asset Protection
Olea europaea subsp. cuspidata	African Olive	-	Containment
Senecio madagascariensis	Fireweed	WoNS	State priority - Asset Protection
Solanum sisymbriifolium	Sticky nightshade	-	Containment, Eradication
Sporobolus fertilis	Giant Parramatta Grass	-	Eradication, Asset Protection, Containment
Tradescantia fluminensis	Wandering Trad	-	Environment

3.3. Fauna Habitat

3.3.1. Hollow-bearing trees (HBTs)

Hollow-bearing trees (HBTs) can provide potential roosting and breeding habitat for a range of fauna species, depending on the size of the hollow. A total of six HBTs were recorded within the subject land. Their locations are provided in Figure 9. Hollows ranged in size across the site, from small sized hollows (\leq 20 cm diameter) to medium-large sized hollow (\geq 20 cm diameter). A total of 5 HBTs, (two containing hollows \geq 20 cm), are located within the impact area on wholly biodiversity certified land. A pre-clearance survey will be undertaken prior to the felling of trees to minimise harm to native fauna, per mitigation measures in Section 6. Any fauna identified during pre-clearance would be relocated in accordance with an appropriate Fauna Relocation Management Plan per the BMP (ELA 2024).

3.3.2. Stags

Stags are dead trees that still provide habitat value as they can contain many crevices and hollows for fauna to utilise. Eleven (11) stags were identified across the subject land, five (5) of which are located in the proposed Master Plan open space and would be retained. Six (6) stags would be impacted by the proposed Master Plan development, wholly on biodiversity certified land. A preclearance survey will be carried out to ensure harm to fauna is minimised when felling stags in accordance with the Flora and Fauna Management Plan (FFMP) prepared as part of the BMP (ELA 2024).

3.3.3. Wetland and Riparian Features

Riparian features have been addressed within a separate Riparian Assessment report prepared by ELA (2024b). Please refer to this report for further information.

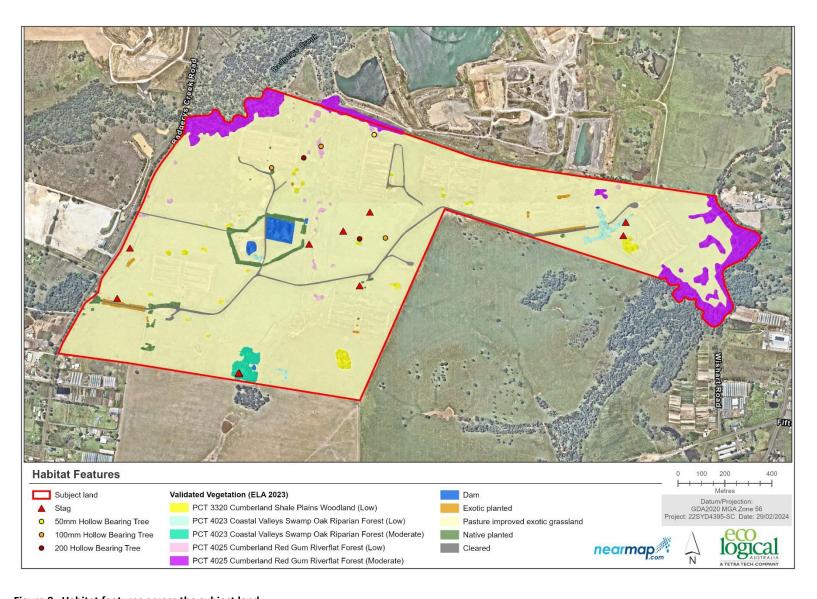


Figure 9 Habitat features across the subject land

3.4. Vegetation Impact and Retention Areas

Impacted, retained and total areas of PCTs and other vegetation or land types within the subject land are summarised below in Table 12.

Table 12 PCTs and non-native vegetation across the subject land

PCT ID	PCT Name / Vegetation Description	Open Space (ha)	Impact Area (ha)	Total Area (ha)
	PCTs			
3320	Cumberland Shale Plains Woodland (Low)	0.49	1.05	1.54
4023	Coastal Valleys Swamp Oak Riparian Forest (Low)	0.05	0.97	1.03
4023	Coastal Valleys Swamp Oak Riparian Forest (Moderate)	1.07	0.02	1.09
4025	Cumberland Red Gum Riverflat Forest (Low)	0.57	0.41	0.98
4025	Cumberland Red Gum Riverflat Forest (Moderate)	8.68	0.32	9.00
	Other vegetation a	nd land types		
-	Native planted	0.09	1.95	2.04
-	Exotic planted	0.21	0.50	0.71
-	Pasture improved exotic grassland	38.68	124.33	163.01
-	Cleared	0.19	2.86	3.06
-	Dam	0.03	1.34	1.37
	TOTAL	50.06	133.77	183.83

4. Consistency between Master Plan and planning framework

4.1. Biodiversity Conservation Act 2016

4.1.1. Biodiversity Certification

The majority of the impact area is located on biodiversity certified land (Figure 4), noting that the intention of mapped HBV is for it to become non-certified land in future biodiversity certification map updates.

Section 8.4(2) of the BC Act describes the effect of biodiversity certification in relation to development under Part 4 of the EP&A Act stating:

'an assessment of the likely impact on biodiversity of development on biodiversity certified land is not required for the purposes of Part 4 of the EP&A Act 1979'.

This report provides evidence of biodiversity certification (Figure 4) and addresses non-biodiversity certified land in Section 3 above and Section 4.3 below.

4.2. Biodiversity and Conservation SEPP

4.2.1. Chapter 4 (Koala Habitat Protection 2021

Chapter 4 of the Biodiversity and Conservation SEPP provides development controls for koala habitats. The subject land is within the City of Liverpool LGA, which is listed in Schedule 2 and corresponds to the Central Coast KMA. Therefore, Chapter 4 applies to the proposed Master Plan.

Part 4.2 Section 4.9 applies to land greater than 1 ha in size (including adjoining land with the same ownership), that does not have an approved Koala Plan of Management (KPoM) applying to the land. The size of the subject land is approximately 182 ha, and the Central Coast KMA does not have an approved KPoM. Therefore, the controls provided in Section 4.9 apply to the development. Section 4.9 states that:

- (2) Before a council may grant consent to a development application for consent to carry out development on the land, the council must assess whether the development is likely to have any impact on koalas or koala habitat.
- (3) If the council is satisfied that the development is likely to have low or no impact on koalas or koala habitat, the council may grant consent to the development application.
- (4) If the council is satisfied that the development is likely to have a higher level of impact on koalas or koala habitat, the council must, in deciding whether to grant consent to the development application, take into account a koala assessment report for the development.
- (5) However, despite subsections (3) and (4), the council may grant development consent if the applicant provides to the council—
- (a) information, prepared by a suitably qualified and experienced person, the council is satisfied demonstrates that the land subject of the development application—
 - (i) does not include any trees belonging to the koala use tree species listed in Schedule 3 for the relevant koala management area, or
 - (ii) is not core koala habitat, or
- (b) information the council is satisfied demonstrates that the land subject of the development application—
 - (i) does not include any trees with a diameter at breast height over bark of more than 10 centimetres, or
 - (ii) includes only horticultural or agricultural plantations.

The subject land contains koala high preferred use species listed for the Central Coast KMA, specifically *Eucalyptus moluccana* (Grey Box), *Eucalyptus robusta* (Swamp Mahogany) and *Eucalyptus tereticornis* (Forest Red Gum). However, the proposed development is not identified as core koala habitat, an area of regional Koala significance (ARKS) nor has Koala previously been recorded within the subject land. Many native Eucalypt trees are to be retained within the subject land within PCT 4025. The protection

of vegetation in the east and west riparian corridors maintain habitat connectivity throughout the Aerotropolis.

4.3. Western Parkland City SEPP

4.3.1. Master Plan Guidelines

Chapter 4 of the Western Parkland City SEPP establishes an optional Master Planning process for certain land within the Aerotropolis. To prepare a Master Plan within the Aerotropolis, the Master Plan must meet criteria set out under the Western Parkland City SEPP and the Western Sydney Aerotropolis Master Plan Guidelines. A Master Plan should:

 align with a precinct plan that applies to the land, or where an amendment to the precinct plan is sought, achieves a superior planning outcome.

The Master Plan achieves a superior biodiversity outcome by increasing the area and quality of protected vegetation and provides for better connectivity through the central riparian corridor compared to the Precinct Plan. This is described in detail in Section 4.3.3 below.

Section 4.41(3) of the SEPP states that:

- The Minister may approve a Master Plan only
 - o with the consent of the owner of land to which the Master Plan applies, and
 - o if satisfied that the Master Plan is consistent with the Master Plan quidelines, and
 - o if the Minister has considered whether the Master Plan is consistent with a development control plan or draft development control plan that applies to the land, and
 - if satisfied that—
 - the Master Plan is consistent with a precinct plan that applies to the land, or
 - the inconsistency is appropriate, taking into account the Master Plan guidelines.

Considering that the Master Plan is inconsistent with the Precinct Plan (see Section 4.3.3), the Master Plan guidelines have been considered below.

4.3.2. Master Plan Requirements

DPE issued the proponent with the Master Plan requirements, in accordance with the Master Plan Guidelines, on 7 September 2022. The requirements relating to biodiversity have been addressed in Table 13 below.

Table 13 Response to DPE Master Plan Requirements

Master Plan Requirement (DPE)	Proposed Master Plan compliance
The draft Master Plan must:	
Describe the proposed regime for avoiding and minimising, managing and reporting any biodiversity impacts of future development	The Master Plan proposes an alternative arrangement to the Precinct Plan open space layout to allow for improved connectivity through the central riparian corridor, more pervious area and increased green space.
	The only proposed impacts to mapped HBV (ENV) is an area of

Master Plan Requirement (DPE)

Proposed Master Plan compliance

0.01 ha of HBV (ENV) in the south of the central riparian corridor. A road was required to be located in this area. However no native vegetation would be affected by construction of the road. Tree Protection Zones were mapped and a retaining wall designed so that a batter would not extend into the HBV (ENV) area. No native vegetation identified as HBV (ENV) will be removed as part of the Master Plan. All other impacts occur on biodiversity certified land, which has been offset elsewhere in the growth centres through the process of biodiversity certification.

This outcome has been achieved by redesigning the internal road network and lot layout in order to entirely avoid impacts to native vegetation identified as HBV. Large areas of native vegetation in certified land will also be retained and open space (Table 12) as well as protected and restored under a Vegetation Management Plan (VMP) (ELA 2024a). Biodiversity impacts resulting from future development will also be subject to a range of mitigation measures in accordance with the Biodiversity Management Plan (BMP) (ELA 2024) which includes dam dewatering, fauna and flora management, wildlife hazard management in addition to the VMP and weed management.

All future development that seeks a complying development certification (CDC) in accordance with the Master Plan will need to comply with the BMP and will therefore mitigate, manage and report any biodiversity impacts.

Demonstrate that the amount of existing native vegetation (ENV) protected under the draft Master Plan must be the same as that which is currently protected under the Western Sydney Aerotropolis Precinct Plan and State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (SEPP) on the land to which the draft Master Plan applies

For the purposes of the Aerotropolis, ENV is referred to HBV (ENV).

A total of 5.13 ha of mapped HBV (ENV) is within in the subject land. No native vegetation within mapped HBV (ENV) will be removed as a result of the Master Plan.

As such, the amount of HBV containing native vegetation will not be reduced as a result of the Master Plan. There are several areas of mapped HBV which do not contain native vegetation, but will be subject to a VMP. As such, the amount of actual vegetated HBV within the subject land is expected to increase.

Be supported by a report and maps (including shapefiles).

This report includes mapping and addresses this requirement. Shapefiles have been supplied by ELA.

4.3.3. Western Sydney Aerotropolis Precinct Plan 2022

Part 4.7 of the Western Parklands City SEPP provisions for development of Precinct Plans and requires development within the Aerotropolis to be consistent with the Western Sydney Aerotropolis Precinct Plan (DPE 2023). The Precinct Plan was adopted in 2022 and updated (Amendment 1) in May 2023.

The site is located in the Aerotropolis Core Precinct. It is a dense urban precinct planned around the Aerotropolis Metro station and Wianamatta-South Creek Corridor system (DPE 2023).

Table 14 provides a comparison of the Western Sydney Precinct Plan objectives and controls with the proposed Master Plan.

Please note that objectives relating to water cycle management, landscaping or arboriculture have not been addressed in Table 14 below. Riparian provisions are addressed in the riparian assessment (ELA 2024b).

Table 14 Compliance with Aerotropolis Precinct Plan (DPIE 2023)

Objectives (BGO) and Requirements (BG)

Master Plan Compliance

4.5 Blue-Green Infrastructure Framework

BGO1 To integrate blue and green systems across the Aerotropolis for water quality management, biodiversity and recreation.

BG1 Development is to contribute to the establishment of the blue-green infrastructure framework for the Aerotropolis in accordance with Figure 5.

BG1 Development is to contribute to the In accordance with Figure 5 of the Precinct Plan, the subject site establishment of the blue-green infrastructure contains land designated as:

- Watercourses
- Stormwater infrastructure
- Indicative Open Space
- Regional Park
- Riparian Streets
- Active Open Space

There are differences between the Precinct Plan open space layout (44 ha) and the proposed Master Plan open space layout (50.06 ha) as presented in Figure 10. The proposed Master Plan provides 3.15 ha more open space than indicated in Figure 5 of the Precinct Plan (Figure 10). This provides many benefits, including improved connectivity through the central riparian corridor and greater pervious area than required under the Precinct Plan.

The alternative open space layout proposed by the Master Plan allows for a more connected blue green grid. This is beneficial for the blue-green infrastructure network, allowing more space for stormwater infrastructure (such as basins) and waterways.

4.5.2 Riparian Corridors

Please refer to the Riparian Assessment (ELA 2024b).

4.5.4 Biodiversity and vegetation corridors

BGO1 Achieve the objectives of, and implement, the Cumberland Plain Conservation Plan.

BGO2 Achieve the vision of a Western Parkland City and maintain Wianamatta-South Creek Corridor as a regionally significant ecological corridor.

BGO3 Protect areas of high biodiversity value including watercourses and riparian zones, Existing Native Vegetation and remnant vegetation and habitat of the Cumberland Plain.

BGO4 Increase and improve landscape connectivity through conservation and restoration of native vegetation to enable plant and animal communities to survive in the long term.

BGO5 Support long-term viability and ecological connectivity by ensuring development does not encroach on protected land and any ecological restoration program selects species that are resilient to a changing climate.

BG1 Existing Native Vegetation and other vegetation under the Cumberland Plain Conservation Plan (refer to Figure 7) is to be protected as required by the Aerotropolis SEPP. Development applications are to demonstrate, to the satisfaction of the consent authority, that measures are in place to protect and provide for the long term management of the

The subject land contains 5.13 ha of ENV, referred to as HBV in the Aerotropolis Core Precinct. Minor impacts to mapped HBV are proposed under the Master Plan, with no native vegetation identified as HBV to be removed. These are described below.

A minor encroachment into HBV in the south of the subject land is proposed by the Master Plan. No native vegetation will be impacted in the mapped HBV area. Some overhanging canopy

Objectives (BGO) and Requirements (BG)

vegetation to achieve biodiversity conservation outcomes under the Growth Centres Biodiversity Certification Order or the Cumberland Plain Conservation Plan as relevant.

Master Plan Compliance

appears within the development footprint, but does not constitute impacts to its TPZ. A retaining wall is proposed to protect this vegetation long-term. A Section 88 instrument under the Conveyancing Act will also be in place for long-term protection of this HBV patch. This is shown in

- Figure 11.
- A minor encroachment into HBV in the north of the subject land is also proposed. No validated native vegetation is present within the affected HBV. This is presented in Figure 12. If required, a Section 88 instrument can be proposed for this patch of mapped HBV outside of the Master Plan open space, however noting it does not contain validated HBV.

All validated HBV is to be retained. A total of 0.055 ha of mapped HBV will be affected in the north and south of the subject land, as described above, but will not affect native vegetation. Only areas containing exotic grassland are to be affected.

As such, it is considered that all existing validated HBV will be protected under the Master Plan.

BG2 Recreation facilities, pathways and other infrastructure are not to be located on land referred to in Requirement BG1.

Land referred to in BG1 encompasses HBV within the subject land. Recreation, pathways, and other hard infrastructure are not located in the mapped HBV areas except where impacts to HBV are described above (BG1). No native vegetation in HBV areas will be cleared as a result of the Master Plan.

BG3 Revegetation and landscaping are designed and managed to account for future climatic conditions and include climate ready species. Resources relating to climate-ready species are available at https://www.mq.edu.au/ data/assets/pdf file/000 6/807666/Climate-Reveg-Guide-v2-2018.pdf

Plantings will be managed under both a landscape plan (Site Image 2023) and a VMP (ELA 2024a) and will select species that are:

- Climate ready in accordance with the Climate Revegetation Guide (2018) wherever possible; and
- Appropriate for the rehabilitation of native PCTs.

It is noted that the priority is to select species and design landscaping in a way that complies with wildlife hazard reduction requirements under the SEPP. As such, in areas outside the VMP, climate ready or locally indigenous species may not be used.

The VMP forms part of a suite of management plans (ELA 2024a) that will guide biodiversity management should the Master Plan be approved and proceed with complying development.

BG4 Development applications are to demonstrate:

- a. reuse of native plants (including but not limited to seed collection) and top soil from development sites that contain known or potential native seed bank. Appropriate uses may include, but are not limited to, application in re-vegetation or restoration works and landscaping in the precincts,
- the relocation of native animals from development sites, prior to development commencing.

Evidence of native seedbank within topsoil exists in the patch of PCT 4023 (Moderate) in the south of the subject land, largely within the impact area. During 2022 vegetation validation survey, this patch was identified as regrowth with no evidence of regeneration works. It was poor in structure with no native midstorey in 2022. By 2023, ELA noted that a native midstory was present and included *Bursaria spinosa* subsp. *spinosa* (Native Blackthorn) and regenerating *Eucalyptus* spp.

As such, this patch is a priority for collection of topsoil and associated native seedbank for reuse in landscaping across the subject land. It is recommended that topsoil from this patch is used in adjacent landscaping works, in areas to be used as HBV offsets (if approved) or other landscaping uses wherever possible.

Objectives (BGO) and Requirements (BG)	Master Plan Compliance
	Reuse of materials within the VMP is identified as an action under the Flora and Fauna Management Plan (FFMP) (ELA 2024a).
	Prior to construction, preclearance survey will be undertaken to ensure any native fauna using habitat features across the site (stags and hollows) are identified and relocated in accordance with the FFMP (ELA 2024a). Similarly, dams to be removed will be subject to a DDP and any native fauna present in the dams will be relocated accordingly.



Figure 10 Precinct Plan (DPE 2023) and proposed Master Plan consistency



Figure 11 HBV (ENV) in the south



Figure 12 Validated HBV in relation to development footprint (north)

4.4. Western Sydney Aerotropolis Development Control Plan 2022 Phase 2

The Western Sydney Aerotropolis Development Control Plan – Phase 2 (Phase 2 DCP) was finalised in November 2022 and applies to the subject land. Chapter 2.4.2 and 2.4.3 of the DCP provide general controls relevant to the protection of biodiversity, trees, and vegetation, in relation to specific performance outcomes. Table 15 below addresses the performance outcomes relating to biodiversity, noting that landscaping and arboricultural specific controls are not address in this report.

Table 15 Phase 2 DCP Performance Outcomes

rformance Outcome Benchmark S	lution	Response
Cł		
the condition of suitable habitat improves within areas of the Cumberland subregion most likely to support long-term viability. a. Bes Fort Cha b. Rec Guit Bus Cha 2. Fencing threaten for ongo 3. Tempora identifies prior to 0 4. Allow pr mainten. 5. Protect i 6. Impleme populativactions u 7. Locate A wholly w determin Fire Serv type, slo	Practice Guidelines: Cooks River/Castlereagh Ironbark of (NSW Department of Environment and Climate age, 2008) within and adjacent to the TEC; and avering Bushland on the Cumberland Plain: Best Practice delines for the Management and Restoration of Iland (NSW Department of Environment and Climate age, 2005). It is to be constructed where required to protect ad species habitat. Site design allows access to fencing any maintenance. They protective fencing to be erected around areas for conservation on or immediately adjoining the site construction commencing. Bolic access to temporary fencing to ensure ongoing ance throughout construction. It open structure design for roads adjacent to known and the Save our Species Program (EES, 2020). The seet Protection Zones (APZs) for bushfire protection in the Castled Ind. The appropriate APZ distance is and development type. It is done and dogs within certified-urban capable is and development type.	The proposed Master Plan is located predominantly on biodiversity certified land. The impact area is wholly biodiversity certified (Figure 4). No further assessment of biodiversity under the BC Act is required for biodiversity certified land. Impacts to HBV are limited to certified land, and will not involve the clearing of native vegetation. A total of 0.055 ha of HBV containing exotic grassland will be affected by the Master Plan. Note that the protection of the HBV in the south will also protect a small area of similar vegetation that is of greater area than 0.055ha. Details of temporary fencing will be provided under the Construction Environment Management Plan (CEMP) and will be in accordance with the DCP. No-go areas are identified within the FFMP, and will be delineated with protective fencing prior to works to protect habitat (specifically HBV areas). The impact area is unlikely to support long-term viability of threatened species, given the majority of this area is exotic grassland. The Master Plan has been sited with this in mind, prioritising the protection of key west and east riparian corridors and the rehabilitation of the central riparian corridor. The control of domestic animals is not relevant as the proposed Master Plan does not include residential development. Seed collection of native vegetation is recommended prior to any clearing as described above, and per the

Perfo	ormance Outcome	Ве	nchmark Solution	Response
		9.	land, consistent with relevant council guidelines as permitted and appropriate. Provide for the reuse of native plants (including but not limited to seed collection) and topsoil from development sites that contain known or potential native seed bank.	FFMP (ELA 2024a).
PO3	Development facilitates the connected movement of native animals through the landscape.	1.	Avoid impacts to habitat features which provide essential habitat for native fauna including ground cover and shrub layers, emerging trees, mature trees, dead trees capable of providing habitat, natural drainage lines and rock outcrops and avoid impacts to soil within the Tree Protection Zone (TPZ) of the retained trees and the subject and neighbouring sites. Movement of fauna is facilitated within and through wildlife corridors by: a. Ensuring that development, services and landscaping associated activities do not create barriers to the movement of fauna along and within wildlife corridors. b. Protect fauna from potential construction hazards during pre-construction and construction. c. Prepare a pre-clearance native fauna survey immediately prior to clearing of native vegetation to ensure that arboreal mammals, roosting and hollow-using birds, bats and reptiles are stopped from accessing any vegetation to be cleared and are translocated prior to clearing. Translocation may require a licence from NSW Environment, Energy and Science under the Translocation Operational Policy. d. Adopt and implement open structure design for roads adjacent to known populations of the Cumberland Plain Land Snail in accordance with actions under the NSW Government's Saving Our Species program.	No wildlife corridors are located within the impact area as no wildlife corridors are mapped in the DCP, CPCP or Aerotropolis Precinct Plan. The Badgerys Creek riparian corridor, the central riparian corridor and South Creek/Wianamatta will be protected and rehabilitated under a VMP (ELA 2024a). This will provide substantial fauna connectivity throughout the subject land and into the wider landscape. Barriers to movement of fauna are not expected to occur as a result of vegetation removal. The proposed removal of HBV occurs in a small, isolated patches of exotic grassland — no native vegetation mapped as HBV will be cleared. Movement of fauna will continue be facilitated by the large extents of habitat within open space across the subject land. The proposed Master Plan will therefore not interfere with the movement of native animals through the landscape, or significantly fragment native fauna habitats.
PO4	Within land subject to the Cumberland Plain	1.	The following threatened species require setbacks:	The development is not within 100 m of a Grey-

Performance Outcome	Benchmark Solution	Response
Conservation Plan only, development adjoining conservation areas provides ecological setbacks to threatened species.	i Grey-headed flying fox camp requires 100m setback to any buildings and development; ii The setback area should be maintained free of flying fox roosting habitat; and iii A flying fox management plan should be provided to demonstrate management and mitigation measures. Raptors: i Raptor nests require a 500m circular setback from where nests are in extensive undisturbed bushland; and ii Where nests are located closer to existing developments, a minimum circular setback distance of 250m should be maintained along with an undisturbed corridor at least 100m wide extending from the nest to the nearest foraging grounds.	headed Flying-fox camp. No raptor species were assessed as potentially or likely to be using the impact area, therefore raptor setbacks are not applicable.
PO5 Noise and light adjacent, and near, conservation areas does not result in any disturbance to wildlife.	 High intensity lighting including industrial or commercial lighting, sports field lighting, lighting within carparking areas and associated with any industrial or commercial-scale retail development shall be designed to avoid light spill into adjoining parks and biodiversity areas (AS 4282 Control of the Obtrusive Effects of Outdoor Lighting, or updates to that standard, are to be considered as a minimum). Install warm coloured LED street lighting where a development footprint contains or is within 100m of known microbat colonies or habitat likely to support microbat colonies to deter insects. Manage light spill and noise producing activities where wildlife impacts are likely to arise from the proposed development and where development is adjacent to avoided land. Measures shall include appropriate noise treatment barriers along major roads and other light and noise attenuation mitigation measures. 	Mitigation measures are provided to ensure lighting is in accordance with ASNZS 4282:2019 Control of the obtrusive effects of outdoor lighting. Measures such as shielding and use of warm-toned lights in proximity to the riparian corridors are recommended to ensure light impacts are minimised. Daily timing of construction activities is recommended in accordance with the standard daytime hours to avoid noise impacts to wildlife during the evening and night, per the FFMP (ELA 2024a).

Performance Outcome		Performance Outcome Benchmark Solution Response		
		4.	Ensure that any residual noise impacts on wildlife arising from development are appropriately mitigated.	
PO7	Retain and protect koala populations and their habitats through mitigating indirect and ongoing impacts from development.		 For all certified-urban capable land adjacent to koala habitat, the following controls apply: a. Design subdivision layout, including perimeter roads and asset protection zones to reduce impacts to, and protect areas of, adjacent koala habitat. b. Signpost areas adjoining koala habitat to identify koalas in the area and associated penalties for non-compliance. c. Exclude planting tree species in open space, recreation areas and urban streets that are koala feed tree species set out below by Schedule 2 – Central and Southern Tablelands and Central Coast Koala Use Tree Species of the State Environmental Planning Policy (Koala Habitat Protection) 2021. d. An ecologist shall be present through the duration of any pre-clearance koala surveys and vegetation clearing works to maintain oversight and responsibility of the activities and koala translocation. Where a koala exclusion fence is not installed between koala habitat and certified-urban capable land, the following development controls apply: a. Prepare a pre-clearance koala survey immediately prior to the removal of native vegetation to ensure minimal disturbance to koala habitat. Implement a translocation plan if koalas are found. Translocation may require a licence from NSW Environment, Energy and Science (EES) under the Translocation Operational Policy. b. Implement a tree-felling protocol to avoid impacts to koalas in trees to be cleared. c. Enforce vehicle wash-down points for machinery, 	Koala have not been recorded on the site or within proximity to it. The Subject land is not within a koala management area under Chapter 3 or 4 of the Biodiversity and Conservation SEPP. Therefore, the Subject land is not adjacent to koala habitat. Regardless, mitigation measures to avoid indirect and ongoing impacts to habitat outside the impact area have been provided in Section 6. Specifically, a preclearance survey has been recommended which will identify and relocate any fauna, including unlikely koala individuals, utilising the trees within the impact footprint prior to their removal. Consideration of the Biodiversity and Conservation SEPP in relation to Koala has been provided in Section 4.2.

Performance Outcome	Benchmark So	olution	Response
	cons	pment and tyres prior to entering and leaving the struction site to control the spread of vegetation logens known to affect koala feed trees.	
	Pre-constructi	on Temporary Fencing	
	prot imm	t temporary protective fencing designed for koala ection to protect adjacent koala habitat on or ediately adjoining the site prior to construction to are koala protection.	
	Dog Containm	ent Fencing	
		gn and construct public dog recreation areas with re containment fencing.	
		gn residential lots with dog containment fencing in ordance with Council requirements.	
	Development	Operation	
	g. Man koal	age roadside vegetation to increase the visibility of as.	
	Vehicle Strike		
	h. Impl	ement traffic calming measures for all development	
		Implement 40km/hr speed limit restrictions on local roads adjacent to koala habitat.	
		Install koala information signposts on perimeter roads and roads adjacent to wildlife habitat areas in accordance with Austroads, Roads and Maritime Services (RMS) technical guidelines, Council Guidelines and relevant Australian Standards.	
	iii	Install traffic calming devices such as speed humps and audible surfacing along perimeter roads adjacent to koala habitat.	
	iv	Install koala-friendly road design structures, such as underpasses, fauna bridges and overpasses as	

Perfo	ormance Outcome	enchmark Solution	Response
		required. Reference to the is to be made.	RMS Biodiversity Guidelines
Chap	ter 2.4.3 – Protection of Trees and Vegetation		
PO1	Existing trees and vegetation are retained, protected, enhanced, and incorporated into the development, wherever possible.	Development is designed to minimis for invasive species and/or noxious we development is designed to minimist vehicular access, utility installations a	bulk earthworks to create suitable levels, retention of tremoval of trees (includes trees within the impact area is unlikely to be practical.
PO2	Minimise threats to the long-term survival of existing trees through tree preservation zones and pruning techniques.	Works and construction activities ar Protection Zone (TPZ) of trees unleassessed the tree and provided guid can be carried out with minimal risk the tree and this has been inclu Protection Plan (Drawing and Specific Any pruning or tree removal works the ecological communities are to adherometric protection and provided to the protection of the protection of the protection of the provided to the protection of the protection	using tree protection zones, which will delineate 'no go' zones for vegetation removal at the construction phase. Where possible, trees will be pruned instead of removed.

Perfo	ormance Outcome	Ber	nchmark Solution	Response
		3.	 practice guidelines: a. Best Practice Guidelines: Cooks River/Castlereagh Ironbark Forest (Department of Environment and Climate Change NSW, 2008) within and adjacent to the threatened ecological community; and b. Recovering Bushland on the Cumberland Plain: Best Practice Guidelines for the Management and Restoration of Bushland (Department of Environment and Climate Change NSW, 2005). Development is designed to avoid impacts on trees, except for priority weeds in accordance with the Council's weed policy. Existing trees have appropriate soil volumes and setbacks from buildings, footpath, road/kerb and gutter and services to provide sufficient space for root and canopy development to ensure the tree reaches its identified mature height and spread. 	
PO3	Where hollow-bearing tree cannot be retained and are removed, they shall be replaced with nesting boxes, as close as possible to where the removed tree was located.	 2. 3. 	The removal of the hollow bearing trees shall be offset by the installation of nesting boxes. The size of the nest box is to reflect the size and dimensions of the hollow removed. Alternatively, the tree hollow could be appropriately mounted on one of the retained trees in a manner where it will not pose a risk to life or property. All nesting boxes and hollows shall be mounted at least 5m above the ground. Requirement for 60% of nest boxes (replacement habitat) to be in place prior to clearing of hollow-bearing trees.	One hollow-bearing tree is proposed to be retained. Five hollow bearing trees will be removed because of the proposed masterplan. A FFMP (ELA 2024a) has been prepared that recommends that nest boxes are installed the existing vegetation of the east and east riparian corridors within the subject land. Hollow bearing trees that are felled should be cut into large sections and retained as deadwood within the VMP area.

5. EPBC - Matters of National Environmental Significance

The EPBC Act establishes a process for assessing the environmental impact of activities and developments where Matters of National Environmental Significance (MNES) may be affected. Under the Act, any action which 'has, will have, or is likely to have a significant impact on a matter of MNES' is defined as a controlled action, and requires approval from the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW), which is responsible for administering the EPBC Act.

The process includes undertaking an Assessment of Significance for listed threatened species and ecological communities that represent a matter of MNES that will be affected because of the proposed action. Significant impact guidelines that outline criteria which have been developed by the Commonwealth of Australia (2013), to provide assistance in conducting the Assessment of Significance and help decide whether or not a referral to the Commonwealth is required.

However, assessment of MNES is not required. On 28th February 2012, the Commonwealth Minister for the Environment announced that the program of development activities within the Sydney Region Growth Centres was approved under the EPBC Act Strategic Assessment process. Specifically, all actions associated with the development of the Western Sydney Growth Centres as described in the *Sydney Growth Centres Strategic Assessment Program Report* (November 2010) have been assessed at the strategic level and approved in regard to their impact on the following MNES:

- World Heritage Properties
- National Heritage Places
- Wetlands of International Importance
- Listed threatened species and communities
- Listed migratory species

These decisions indicate that the Commonwealth is satisfied that the conservation and development outcomes that will be achieved through the Western Sydney Growth Centres Program will satisfy their requirements for environmental protection under the EPBC Act. Provided that development activity proceeds in accordance with the Growth Centres requirements (such as the Biodiversity Certification Order, the Western Parkland City SEPP, Phase 2 DCP, Growth Centres Development Code etc.) there is no requirement to assess the impact of development activities on MNES within the Growth Centres and no requirement for referral of activities to the Commonwealth DCCEEW.

The subject land is therefore exempt from further assessment of threatened species and endangered ecological communities listed under the Commonwealth EPBC Act if the proposed Master Plan is granted approval at the State level and is in accordance with the various Growth Centres requirements.

Regardless, where habitat for native fauna is to be removed, irrespective of biodiversity certification, the works should be done in such a manner that minimises the risk of risk of injury or death to native fauna.

6. Mitigating and Managing Impacts

Measures proposed to mitigate and manage impacts to the environment and native fauna within the impact area before, during and after construction are detailed in the Biodiversity Management Plan (BMP) (ELA 2024a). All works are to be complaint with the measures provided in the approved BMP, which includes:

- Flora and Fauna Management Plan (FFMP) for impacts during construction;
- Vegetation Management Plan (VMP) for post-construction restoration and assisted regeneration of native vegetation;
- Wildlife Management Plan, in relation to wildlife hazards and risk;
- Weed Eradication Management Plan (WEMP); and
- Dam Dewatering Plan (DDP).

7. Conclusion

This report has been prepared by ELA for Ingham Property Group Pty Ltd (IPG) (the Proponent) to support the Master Plan Request for 475 Badgerys Creek Road, Bradfield NSW 2556.

The Master Plan is located within majority biodiversity certified land under Chapter 8 of the BC Act. This report describes the vegetation within the subject land, biodiversity certification, proposed impacts to mapped HBV validated as exotic grassland (0.055 ha), and the Master Plan's consistency with the planning framework (Western Sydney Aerotropolis DCP and Aerotropolis Precinct Plan).

Ultimately, the Master Plan will provide a greater area open space than required by the Precinct Plan, and will protect and restore large areas of HBV equivalent than required by the Biodiversity Certification Order, Western Parkland City SEPP and Precinct Plan. No native vegetation mapped as HBV will be removed under the Master Plan.

The proposed Master Plan layout also provides better connectivity through the central riparian corridor, through proposed adjustment to the Precinct Plan open space network. Revegetation works to be completed under a VMP and landscaping are proposed, which aim to improve the condition and extent of native vegetation across the riparian corridors and within the patch of Casuarinas identified as HBV.

Mitigation measures relating to potential direct and indirect impacts are provided within this report to reduce and address any residual impacts from the Master Plan. A Biodiversity Management Plan (BMP) (ELA 2024a) has been prepared to guide the management of biodiversity before, during and after construction and includes the following:

- Flora and fauna management plan (FFMP)
- Vegetation Management Plan (VMP)
- Weed eradication and management plan (WEMP)
- Wildlife Management Plan
- Dam Dewatering Plan (DDP)

The proposed Master Plan has avoided impacts to protected native vegetation, in the form of validated HBV, and will continue to appropriately manage biodiversity impacts throughout future development stages in accordance with the BMP and other relevant plans (e.g. Construction Environmental Management Plan).

8. References

Department of Planning and Environment (DPE) 2022. *Register of Declared Areas of Outstanding Biodiversity Value*. Accessed 21 June 2023 from https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/areas-of-outstanding-biodiversity-value-register.

Department of Planning and Environment (DPE) 2023. Western Sydney Aerotropolis Precinct Plan. Amendment 1 - May 2023. Accessed 15 June 2023.

Department of Planning, Industry and Environment (DPIE) 2021. *Western Sydney Aerotropolis Master Plan Guidelines*. Accessed https://www.planning.nsw.gov.au/sites/default/files/2023-03/western-sydney-aerotropolis-master-plan-guidelines.pdf.

Eco Logical Australia (ELA) 2024a. *Biodiversity Management Plan – IPG Badgerys Creek Master Plan.* Prepared for Ingham Property Group.

Eco Logical Australia (ELA) 2024b. *IPG Badgerys Creek Master Plan Riparian Assessment*. Prepared for Ingham Property Group.

IPG Badgerys Creek N	laster Plan– Biodiversity Assessment Report Ingham Property Group Pty Ltd
Appendix A Biodiversity Consistency Repo	ort

Badgerys Creek Master Plan Biodiversity Consistency Report

An assessment of consistency between the Relevant Biodiversity Measures of the Biodiversity Certification Order, and the Western Sydney Aerotropolis (Aerotropolis Core, Badgerys Creek, Wianamatta-South Creek) Precinct Plan and the proposed 475 Badgerys Creek Road, Bradfield NSW Master Plan

June 2024

1. Introduction

In December 2007 an order conferring biodiversity certification on *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (Growth Centres SEPP) was made by the then Minister for the Environment under section 126G of the then *Threatened Species Conservation Act 1995* (TSC Act).

In July 2008, the Minister's certification was validated by the *Threatened Species Conservation Amendment (Special Provisions) Act 2008* which was subsequently incorporated into Part 7 of Schedule 7 of the TSC Act. The amendment gives the Minister for the Environment the power to suspend or revoke the certification if any of its conditions, termed Relevant Biodiversity Measures (RBMs), are not complied with. RBMs refer to the conditions under Schedule 1 of the *Order to confer biodiversity certification on the State Environmental Planning Policy (Sydney Region Growth Centres) 2006* – referred to as the Biodiversity Certification Order.

The RBMs applying to the certification have remained unaltered since gazettal of the original order and require (among other things) the permanent protection of 2,000 hectares of high-quality vegetation within the Growth Centres.

On 25 August 2017, the *Biodiversity Conservation Act 2016* (BC Act) came into force, replacing the TSC Act. However, section 35 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017 provides that:

35 Biodiversity certification that was conferred on land under Part 7AA of the Threatened Species Conservation Act 1995 and that was in force on the repeal of that Act is taken to be biodiversity certification conferred on the land under Part 8 of the new Act.

This report has been prepared to assess the consistency of the proposed Badgerys Creek Master Plan with the Aerotropolis precinct plan, biodiversity certification and the RBMs.

This report has been prepared in a table format and addresses all RBMs that are relevant to the master planning process. It is noted that some RBMs related to other government policies, responsibilities and programs and are not specific to this matter and have therefore not been included in the report.

A complete copy of the relevant biodiversity measures can be found on the Department of Planning, Industry and Environment's website at Register of biodiversity certification orders | NSW Environment, Energy and Science.

Where this report indicates that the proposed master plan is inconsistent with the precinct planning and/or biodiversity certification, full justification for the inconsistency is provided as part of the Biodiversity Assessment Report for the precinct.

Definitions

Terms defined below appear in **bold** in the table. Where the terms are also defined in the Biodiversity Certification Order, the definitions provided are consistent with those in the Order. However, the Department of Planning and Environment (DPE) and Environment and Heritage Group (EHG) division are replaced in this report for the Growth Centres Commission and the Department of Environment and Climate Change, respectively.

- Biodiversity Certification Maps means the maps marked "North West Growth Centre Biodiversity Certification" and "South West Growth Centre – Biodiversity Certification" dated November 2007 and included in Schedule 2 of the Biodiversity Certification Order.
- BC Act means the Biodiversity Conservation Act 2016 (replaces the Threatened Species Conservation Act 1995).
- Certified Area means an area marked as a certified area on a biodiversity certification map.
- Non-certified Area means an area marked as a non-certified area on a biodiversity certification map.
- Clearing of existing native vegetation means any one or more of the following:
 - a) cutting down, felling, thinning, logging or removing existing native vegetation in whole or in part,
 - b) killing, destroying, poisoning, ringbarking, uprooting or burning existing native vegetation in whole or in part.
- EP&A Act means the Environmental Planning and Assessment Act 1979.
- Western Parkland City SEPP, or 'the SEPP', refers to the relevant State Environmental Planning Policy which applies to the subject land, being the State Environmental Planning Policy (Precincts Western Parkland SEPP).
- Existing Native Vegetation (*ENV*) means areas of indigenous trees (including any sapling) that:
 - c) had 10% or greater over storey canopy cover present,
 - d) were equal to or greater than 0.5 Ha in area, and
 - e) were identified as "vegetation" on maps 4 and 5 of the draft Growth Centres Conservation Plan.
- High Biodiversity Value (HBV) means the same as ENV but is the term used for ENV within the Aerotropolis under the Western Parklands City SEPP. For the purposes of this repot, the term ENV is used instead as this is the term used under the Growth Centres Biodiversity Certification Order.
- Minister means the Minister administering the TSC Act and/or the BC Act.
- Protection or Protected in relation to land means land that is protected by a land use zoning
 under an environmental planning instrument or public ownership arrangements that provide
 for the protection of biodiversity values as a priority, or another arrangement that provides in
 perpetuity security for biodiversity on the subject land.
- Relevant Biodiversity Measures means the conditions in Schedule 1 of the Biodiversity Certification Order.
- TSC Act means the Threatened Species Conservation Act 1995.

2. Consistency Assessment

Table 1: Assessment of proposed Badgerys Creek Master Plan consistency with the relevant biodiversity measures of the Biodiversity Certification Order and the Western Sydney Aerotropolis Precinct Plan (DPE 2023)

	Relevant Biodiversity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
		General		
4	Copies of all final reports, maps, reviews, plans and monitoring data referred to in the conditions of biodiversity certification must be held by the DPE and made publicly available, either on request and/or by a mechanism that is broadly publicly accessible. This does not apply to material that is commercially sensitive or contains sensitive information regarding the location of threatened species, populations or ecological communities or their habitat.	All information required by the RBMs for the Master Plan such as this report and associated spatial data will be supplied as required and for public exhibition.	Yes	-
	Native	vegetation to be retained within the	e Growth Centres	
6	A minimum of 2,000 hectares of existing native vegetation must be retained and protected within the Growth Centres, either within the certified areas and/or the non-certified areas , subject to conditions 7 to 13 below.	The Masterplan will protect 4.59 ha of ground truthed ENV.	Yes.	The Western Parkland City SEPP identifies 5.13 ha of HBV (ENV) to be protected within the subject land to maintain parity with the 2,000 ha requirement. However, as per condition 13 below, ground truthing of the ENV found that 0.54 ha of the mapped HBV (ENV) did not contain native vegetation. For the purposes of this consistency report, the amount of ENV to be protected is therefore 4.59 ha.

	Relevant Biodiversity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
Reter	ition of existing native vegetation during precinct planning			
7	During the precinct planning process, the DPE may determine to make areas of existing native vegetation within the non-certified areas available for development if the clearance of such vegetation is considered necessary for either the provision of essential infrastructure and/or to meet the required Development Parameters specified in the Growth Centres Development Code.	No areas of ENV on non-certified land are proposed to be developed. All ENV on non-certified land will be avoided.	Yes	
8	In making a determination under condition 7, the DPE must demonstrate by way of information provided during the public exhibition of the precinct plan (where that exhibition occurs after this order takes effect) that the clearing of any existing native vegetation in the non-certified areas will be offset by: (a) the protection of an equal or greater area of existing native vegetation elsewhere in the Growth Centres; and/or (b) the revegetation and/or restoration of an area of land elsewhere in the Growth Centres, subject to satisfying the following, (i) that the clearance of existing native vegetation in the non-certified areas will not affect the capacity to		NA	
	non-certified areas will not affect the capacity to achieve overall improvement or maintenance of biodiversity values for threatened species, populations and ecological communities and their habitats,			

Relevant Biodiversity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
(ii) the revegetated and/or restored areas will be protected,			
(iii) the extent of revegetation and/or restoration compared to clearing of existing native vegetation must be undertaken at a ratio of at least 3:1 (to reflect the greater ecological risks relative to retaining existing native vegetation),			
(iv) areas subject to revegetation and/or restoration must be of a suitable boundary configuration and design to support long-term management,			
(v) revegetation and/or restoration of the proposed areas would not be undertaken under another scheme or regulatory requirement already in operation at the time that the clearing is approved (this includes but is not limited to any approvals, and associated conditions of such approvals, that may be required under the <i>Rivers and Foreshores Improvement Act 1948</i> and <i>Water Management Act 2000</i>),			
(vi) revegetation and/or restoration will be undertaken by suitably qualified and experienced persons using indigenous plant stock, and			
(vii) sufficient resources will be made available to undertake the revegetation and/or restoration and any necessary follow-up maintenance and monitoring for a minimum period of 5 years following the commencement of the revegetation and/or restoration.			

	Relevant Biodiversity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
9	Revegetation and/or restoration may be partly counted towards meeting the overall requirement to protect 2,000 hectares of existing vegetation required in condition 6. The amount that may be counted shall be calculated by dividing the total area of revegetation and/or restoration required under condition 8b (iii) by 3. Note: for example, if 9 hectares of revegetation is undertaken then 3 hectares may be counted.	Whilst revegetation is not necessary for this precinct to be compliant with the conditions, the Master Plan proposes to protect, restore or regenerate an additional 23.73 ha of land to PCT 4025 Cumberland Red under a Vegetation Management Plan (VMP) throughout the riparian corridors.	NA	NA

	Relevant Biodiversity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
	ntion of existing native vegetation shown in areas marked with atching			
12	Notwithstanding any other conditions of biodiversity certification, in the lands marked by a red hatching on the biodiversity certification maps existing native vegetation must not be cleared unless it is in accordance with a plan of management or unless such clearance has been agreed to by the DPE.	No land marked with red hatching on the biodiversity certification maps is within the subject land.	Yes	
Ground-truthing of existing native vegetation				

	Relevant Biodiversity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
13	If new information becomes available after the biodiversity certification order took effect that demonstrates that the vegetation within an area does not otherwise meet the definition of existing native vegetation , then for the purposes of conditions 7 to 8 and condition 11 to 12 only the area of confirmed existing native vegetation shall be considered.	ELA conducted ground truthing of the 5.13 ha of mapped ENV within the subject land. A total of 0.54 ha of mapped ENV did not contain native vegetation. Therefore, for the purposes of conditions 7 to 8 and 11 to 12, the relevant amount of ENV to be protected is 4.59 ha.	Yes	
Addit veget	ional conservation actions within the Growth Centres – native ation			
14	During or before the preparation of the relevant precinct plan(s) under the Growth Centres Development Code, a further detailed assessment must be undertaken of the areas adjoining or proximate to the Shanes Park Air Services Australia site marked in blue hatching on the biodiversity certification maps .	N/A	Yes	-
15	The assessment referred to in condition 14 must examine whether the areas meet the criteria specified in Schedule 3.	N/A	Yes	-
16	Based on the outcomes of the assessment the EES shall provide advice to the Minister on whether the areas should be included within the certified areas or the non-certified areas shown on the biodiversity certification maps .	N/A	Yes	-
Addit	ional conservation actions within the Growth Centres – plants			

	Relevant Biodivers	ity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
17	plan(s) under the	the preparation of the relevant precinct Growth Centres Development Code relating erred to in the table below, the following indertaken:	N/A The black hatched areas are outside the Precinct boundaries.	Yes	-
	Species Acacia pubescens	Required action Potential populations at Cross Street, Kemps Creek and Thirty-second Avenue, Austral – as shown in black hatching on the biodiversity certification maps: • survey to confirm the presence of the species, and if the species is present, provide for the protection of the area of suitable habitat for the species to the satisfaction of the OEH.			
	Pimelea spicata	Potential populations at Denham Court Road – as shown in black hatching on the biodiversity certification maps: • survey to confirm the presence of species, and if the species is present, provide for the protection of the area of suitable habitat for the species to the satisfaction of the OEH.			

Relevant Biodiversity Measure		Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
Persoonia hirsuta	Potential populations at North Kellyville — as shown in black hatching on the biodiversity certification maps: • survey to confirm the presence of the species, and if the species is present, provide for the protection of the area of suitable habitat for the species to the satisfaction of the OEH.			
Leucopogon fletcheri	Known population at North Kellyville – as shown in black hatching on the biodiversity certification maps: • survey to confirm the extent of the population, and provide for the protection of the population to the satisfaction of the OEH.			
Darwinia biflora Hibbertia superans	Known populations at North Kellyville – as shown in black hatching on the biodiversity certification maps:			
Epacris purpurascens var purpurascens Eucalyptus sp	survey to confirm the extent of the populations, and provide for the protection of the population to the satisfaction of the OEH.			

	Relevant Biodivers	ity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
	decide that it is a	tion of the above actions the Minister may opropriate to amend the boundaries of the odiversity certification, in accordance with			
Addit	ional conservation a	ctions within the Growth Centres – animals			
18	plan(s) under the (the preparation of the relevant precinct Growth Centres Development Code relating It to in the table below, the following actions in:	N/A The black hatched areas are outside the Precinct boundaries.	Yes	-
	Species Green and Golden Bell Frog	Required action Potential population at Riverstone – as shown in black hatching on the biodiversity certification maps: Option 1 • survey to confirm the presence of the species, and • if the species is present, provide protection of the area of suitable habitat for the species to the satisfaction of the OEH. Option 2 • if the species is present at			

	Relevant Biodiversity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
	Riverstone but cannot be adequately protected to the satisfaction of the OEH, then: a) undertake targeted survey to confirm the presence of the species elsewhere in the Growth Centres, and b) if the species is present elsewhere in the Growth Centres, provide for the protection of an area(s) of suitable habitat for the species to the satisfaction of the OEH. Note: On completion of the above actions the Minister may decide that it is appropriate to amend the boundaries of the area subject to biodiversity certification, in accordance with condition 3.			
	ional conservation actions within the Growth Centres – opment sites			
19	Within twelve months of the biodiversity certification order taking effect, the DPE (in consultation with the EHG) must put in place procedures so that all future precinct plans (excluding any plans that were publicly exhibited before the biodiversity certification order took effect), where practicable, provide for the appropriate re-use of: (a) native plants (including but not limited to seed collection) and the re-location of native animals from development	These provisions will be addressed by management plans.	Yes	These provisions will be incorporated into the Biodiversity Management Plan (BMP) (ELA 2023) as required by the Phase 2 DCP.

	Relevant Biodiversity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
	sites, prior to development commencing; and (b) top soil from development sites that contain known or potential native seed bank. For the purposes of condition 19a and 19b appropriate uses may include, but are not limited to, application in revegetation or restoration works and landscaping in the Growth Centres.			
Futur	re precinct plans			
35	During the preparation of future precinct plans (excluding any precinct plans already publicly exhibited before this order took effect) the GCC must undertake and make publicly available an assessment of the consistency of the proposed precinct plan with the conditions of biodiversity certification. This may occur during or before any public exhibition of future precinct plans.	This assessment of consistency has been prepared to satisfy this RBM. This report may be publicly exhibited with the full Master Plan package as required.	Yes	This assessment addresses all RBMs applicable to the planning for the Badgerys Creek Master Plan.
Futur	re threatened species listings or discoveries			
36	Where a preliminary determination is made under the Act to list a species, population or ecological community, and that species, population or ecological community may or is known to occur within the Growth Centres, then the DPE must (as soon as practicable) provide advice to the EHG on whether: (a) the species, population or ecological community is known or likely to be present in the Growth Centres; (b) it was considered during the preparation of the draft Growth Centres Conservation Plan by the DPE; and	DPE does not propose to make a preliminary determination under the Act to list a species, population or ecological community. EHG to provide comments during the exhibition of the Master Plan package.	Yes	-

	Relevant Biodiversity Measure	Comment	Consistent with RBMs and Part 7 of Schedule 7 of the TSC Act	Justification
	(c) whether the SEPP, and related measures, provides adequate protection for the species, population or ecological community.			
37	Based on the information provided in accordance with condition 36, and any other relevant matters, the EHG shall advise the Minister on whether to formally review, maintain, modify, suspend or revoke the biodiversity certification of the SEPP if the species, population or ecological community is listed under the Act.	-	Yes	-

3. Conclusion

This report includes assessment of the consistency of the proposed Badgerys Creek Master Plan with the Western Sydney Aerotropolis Precinct Plan, biodiversity certification and the applicable relevant biodiversity measures.

It is concluded that the Master Plan could be deemed consistent with the biodiversity certification of the Growth Centres SEPP, as follows:

- The Master Plan would protect 4.59 ha of field validated ENV identified under the Western Parkland City SEPP as being protected via the HBV (ENV) clause.
- The SEPP includes Chapter 4 Clause 4.25A (2) which prohibits the clearing native vegetation within Existing Native Vegetation (ENV) areas (i.e. HBV). No native vegetation will be cleared under mapped HBV (ENV) areas. Only exotic grassland will be affected in mapped HBV (ENV) areas, therefore the Master Plan is consistent with the SEPP.
- The Master Plan is consistent with the Precinct Plan due to an alternate open space layout, and an additional 3.15 ha of open space has been dedicated by the Master Plan within the subject land. The Master Plan is thought to provide better riparian connectivity through the central corridor, and will allow for a greater pervious area than the Precinct Plan.

Annex A
Biodiversity Certification of the Badgerys Creek Master Plan (Chapter 4 (Western Sydney Aerotropolis) of the Western Parkland City SEPP)

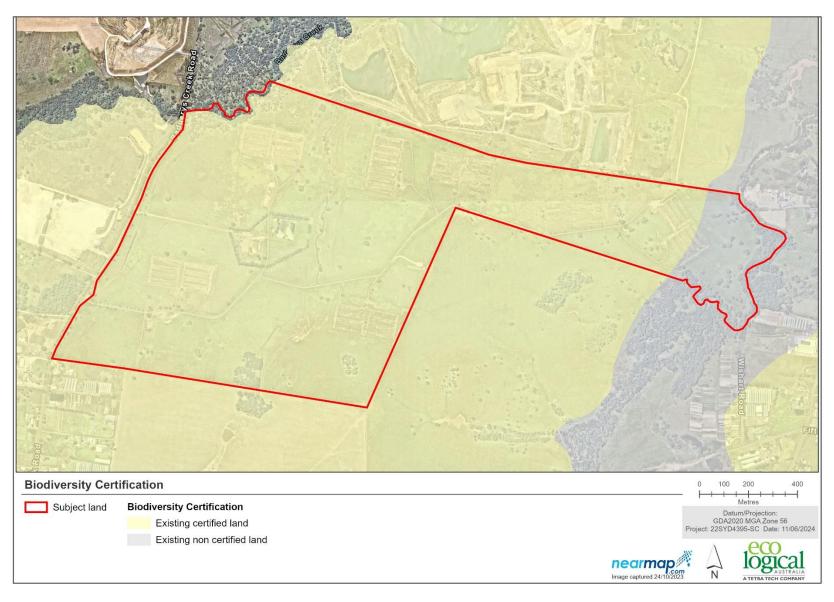
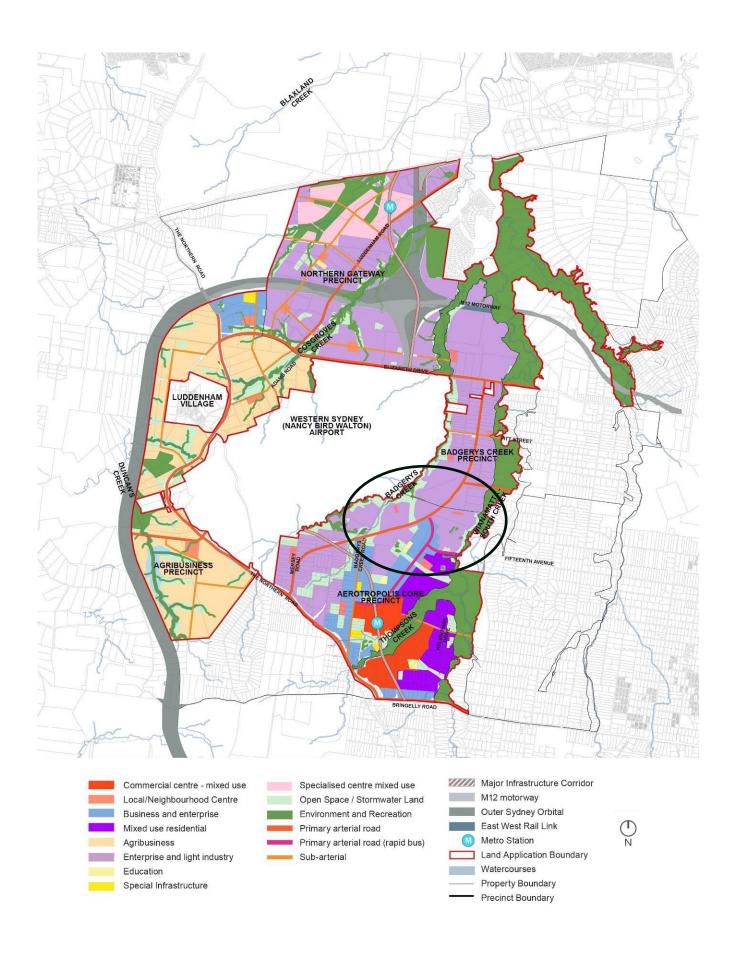


Figure 13 Biodiversity certified land



Figure 14 High Biodiversity Value (Existing Native Vegetation) - Western Parkland City SEPP

Annex B
Adopted Precinct Plan for the Western Sydney Aerotropolis (DPE 2023)
Biodiversity Consistency Assessment - Western Sydney Aerotropolis - 475 Badgerys Creek, Bradfield Master Plan Request



Annex C
Proposed Master Plan consistency with the Precinct Plan (including field-validated High Biodiversity Value (ENV) and ACHVV calculations)

Calculations of validated HBV (ENV) within the subject land

Results of field validation for HBV

Note: As the HBV (ENV) in this precinct partially exists on certified land, this Consistency Report assesses the protection of HBV (ENV) regardless of whether it is certified or non-certified.

Reference	Item	Area (ha)	Area (ha)	Ha Total
		Non-certified	Certified land	
А	Area of mapped HBV (as per Conservation Plan/SEPP)	3.67	1.46	5.13
В	Area of validated HBV	3.44	1.15	4.59

Summary of impacts, offsets and areas of HBV to be protected

Reference	Item	Area (ha)
Α	Area of mapped HBV in non-certified areas (as per	3.67
	Conservation Plan)	
A2	Area of mapped HBV in certified areas	1.46
В	Area of validated HBV in non-certified areas	3.44
B2	Area of validated HBV in certified areas	1.15
С	Impacts: Validated non-certified HBV to be cleared (area to	0.00
	become certified)	
C2	Impacts: Validated certified HBV to be cleared (under	0.00
	proposed Master Plan)	
D	Offsets: Validated certified HBV to be used as offset (area to	N/A
	become non-certified)	
Е	Total area of validated HBV to be protected in non-certified	3.44
	areas (E = B-C+D)	
E2	Total area of validated HBV to be protected in certified areas	1.15
	(E2 = B2-C2+D)	
F	Total area of validated HBV to be protected (F = E+E2)	4.49



Figure 15: HBV (ENV) in the south. No impacts to native vegetation.

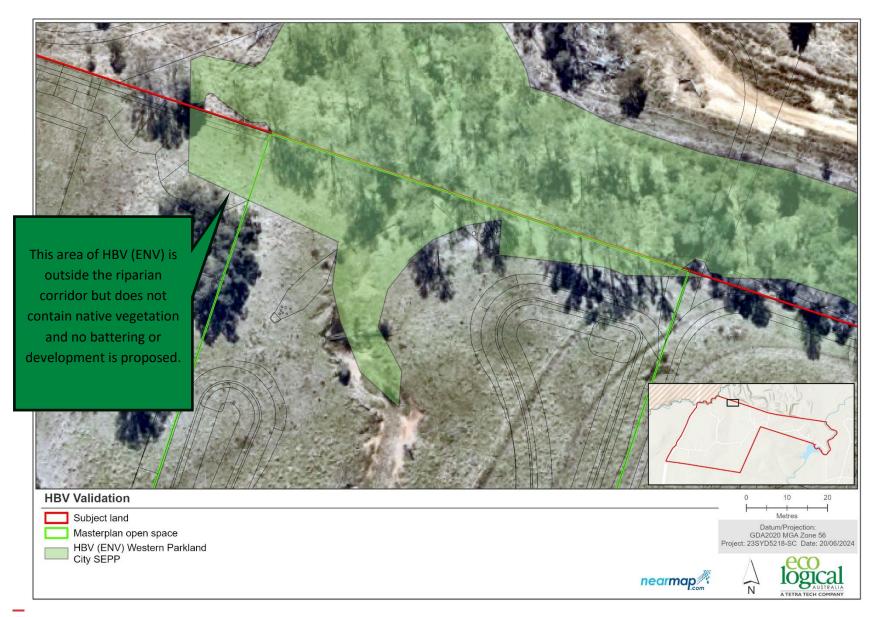


Figure 16: Validated HBV (ENV) at the northern end of central riparian corridor.

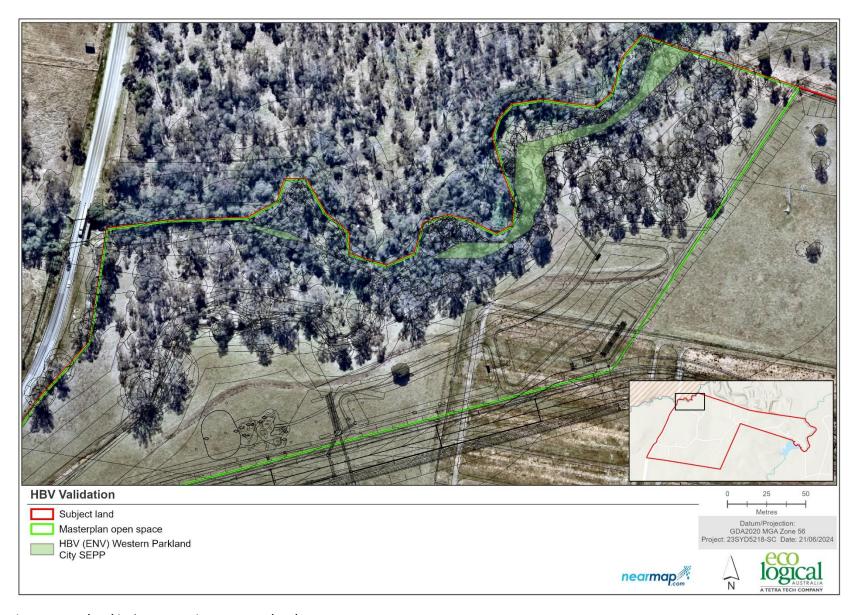


Figure 17: HBV (ENV) in the west. No impact to HBV (ENV).



Figure 18: HBV (ENV) in the east is within the riparian corridor and Open Space. No impacts to HBV (ENV).

Annex D			
Proposed Amendments to Biodivers	sity Certificatio	on Map	
Biodiversity Consistency Assessment - Western Sydney A	Aerotropolis – 475 Bado	gerys Creek. Bradfield Ma	ster Plan Request

Comparison of existing and proposed certified/non-certified land

The following table outlines the current and proposed certified and non-certified areas in the subject land.

No changes are proposed to certified/non-certified land as part of the Master Plan. It is noted that mapping updates to the existing biodiversity certification areas are may occur, however this is not part of the Master Plan proposal. Majority of the subject land's HBV (ENV) is located within certified land.

The Master Plan only proposes to impact non-native vegetation mapped as HBV (ENV) within certified land.

Land Type	Precinct Current Area in subject land (ha)	Master Plan Proposed Area (ha)
Certified Land	170.46	170.46
Non-Certified Land	13.36	13.36
Not Subject to State Environmental Planning Policy (Sydney Region Growth Centres) 2006	0.00	0.00

Annex E	
Proposed Changes to the Precinct Plan Open Space Layout	

Comparison of Masterplan and Precinct Plan open space networks

The following table outlines the current and proposed open space network in the subject land.

The Masterplan provides a greater area of open space (additional 3.15 ha) with improved connectivity through the central riparian corridor.

Land Type	Current Precinct Plan Area (ha)	Master Plan Proposed Area (ha)
Open Space	44	50.06





