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Belinda Kennewell
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure

Dear Belinda,

Response to Submissions | SSD-36138263

This Information Request Letter (**RFI Letter**) has been prepared by Urbis Ltd (**Urbis**) on behalf of The Trustee for Huntingwood Property Trust (**the Applicant**) to address the matters raised during public exhibition of a Section 4.55(1A) application to modify the State Significant Development consent (SSD-36138263) (herein referred to as MOD 2).

The Department of Planning, Housing and Infrastructure (**DPHI**) issued a letter prepared by the Development Coordination Authority (**DCA**) to the Applicant on 19 August 2026 requesting a response to the issues raised by Environment, Biodiversity & Heritage Advisory, and Blacktown City Council (**Council**) during public submission of the MOD 2 application.

This RFI Letter responds to all issues raised and is accompanied by a response document and figures prepared by Anne Clements and Associates Pty Ltd included at **Appendix A**.

1 Exhibited Project

Following a post approval detailed review of the original development consent (as amended by MOD 1), the Applicant identified the need for further minor modifications. The changes are described under two key headings:

- Built form modifications relate to Warehouses 1–4 only (no changes to Warehouse 5) and comprise minor changes to internal warehouse and office configurations, updates to the warehouse and office façade designs, awnings, external lighting, estate signage and the construction of a skywalk access between Warehouses 3 and 4.
- Further, consent is sought for tree removal and civil works along the site's northern boundary opposite warehouses 1-4, and within the road reserve of the Great Western Highway to facilitate refined design to the approved upgrade works for the Flushcombe Road / Great Western Highway. More specifically, these tree removal and civil works will enable the delivery of a shared pedestrian pathway and slip lane resulting from conditions B6 to B12 on the overarching consent which requires ESR to enter into a Works Authorisation Deed (WAD) with TfNSW for all civil works associated with the access road connection to the highway.

Since the final s138 Approval, the road work design has been refined by TfNSW to include a changed earthworks extent and delivery of a shared path, which is now reflected in the WAD.

2 Response to Request for Additional Information

Table 1 below provides a summary of the items raised in the DPHI Request for Information and submissions received during the exhibition of the proposed modification, along with responses addressing each item.

Table 1 Response to RFIs

Issue Raised	Project Response	Supporting Document
DCA Environment, Biodiversity & Heritage Advisory		
1. Native vegetation impacts *The ground disturbance area shown in Figure 7a appears to include a line of trees parallel to Flushcombe Road. Clarify whether these trees will be impacted by the works and, if so, whether the vegetation meets the definition of native vegetation and/or aligns with Cumberland Plain Woodland Critically Endangered Ecological Community (CEEC). Any native vegetation impacts should be incorporated into the BAM assessment, including the vegetation mapping and credit calculations as relevant.*	The Ground disturbance area shown in Figure 7a attached with this response includes Blacktown City Council's road reserve on the eastern side of Flushcombe Road. The line of trees parallel to Flushcombe Road are those on the road reserve outside the western fenceline of the approved SSD Augusta Estate. The line of trees in question have been cleared as part of S138 Works. The clearing of these trees was approved on 27 February 2025 as an Engineering Delegated Authority Decision No RDA-24-03184 under the Road Act 1993 by Blacktown City Council (see the Decision in Appendix 1). This approximately 0.1 ha strip of roadside vegetation was sampled in BAM Plot 7 prior to its removal as part of the assessment process for the Augusta Estate BDAR (Clements et al. 2024a). The vegetation was identified as moderate condition PCT 3319 Cumberland Shale Hills Woodland, meeting the criteria for the Critically Endangered Ecological Community Cumberland Plain Woodland in the Sydney Basin Bioregion under the Biodiversity Conservation Act 2016 (Figure A). Despite this vegetation having a 42.9% cover by High Threat Weeds and being situated on a cut batter slope of a road reserve, the calculated Vegetation Integrity was relatively high at 63 (*see **attachment** response from Anne Clements & Associates Pty Ltd dated 3 September 2026*). This strip of roadside vegetation is mapped on the Biodiversity Values Map (Figure 2e of the Augusta	Appendix A

	Estate BDAR), hence clearing of this vegetation would trigger the Biodiversity Offset Scheme, if it had not already been approved for clearing.	
2. Mitigation measures *The BDAR proposes expansion of the conservation areas fronting the GWH. This is to compensate for impacts to existing conservation areas that provide habitat for the Swift Parrot. However, the proposed revised conservation area footprint is not mapped, and it is unclear how or where this measure will be implemented.* *Provide mapping and details of the proposed conservation area expansion, including its location, extent and proposed implementation. This should also and demonstrate how the measure will contribute to mitigation of impacts to Swift Parrot habitat.*	The vegetation and landform within the Augusta Estate Conservation Areas are subject to the approved Augusta Estate Vegetation Management Plan (VMP) (Clements et al. 2024b). The aims of the VMP include the conservation, enhancement and re-establishment of connected Cumberland Plain Woodland (CPW) linking the existing degraded fragments. Despite the existing fragmented patches of canopy trees in Conservation Areas A and B, these conservation areas have recently been mapped as Important Habitat for Swift Parrot (Lathamus discolor). This mapping assumes success implementation of the Augusta Estate VMP with extensive re-establishment of Eucalyptus tereticornis and E. moluccana. The MOD 2 proposal provides an opportunity to expand the Augusta Estate conservation areas with works directed to providing Swift Parrot habitat as part of the conservation, enhancement and re-establishment of connected Cumberland Plain Woodland (CPW). The Swift Parrot migrates to the Australian south-east mainland between February and October. From the Bionet Profile, Swift Parrot occur in areas where eucalypts are flowering profusely or where there are abundant lerp infestations. Within the Cumberland Plain Woodland within the Augusta Estate, the available food resources are the canopy trees of Eucalyptus tereticornis and E. moluccana. Both these species are known to flower in winter time and E. moluccana is commonly lerp infested. The proposed expansion of Conservation Area A is up to approximately 0.5 ha depending on the requirements of TfNSW for the GWH, ideally connecting Conservation Area A with Conservation Area C. Plantings of large stands of local native canopy trees Eucalyptus tereticornis and E. moluccana, as prescribed in the VMP for Conservation Area A, would extend across the approved landscape setback fronting the GWH (including the Light Blue Area on the Landscape Plan shown on Figure 1f). The approximate conservation	Appendix A

area expansion, depending on the requirements of TfNSW for the GWH, is shown on Figure B.

Proposed implementation and how the measure will contribute to mitigation of impacts to Swift Parrot habitat.

The expansion of Conservation Area A is directed to providing Swift Parrot food resources, with dense planting of large stands of Eucalyptus moluccana and E. tereticornis. This measure is in line with the Conservation Strategy and Critical Actions for Swift Parrot under the Saving our Species strategy which includes:

> *increase the extent and quality of habitat to increase food supply and improve foraging efficiency….include locally occurring species that provide important food resources in revegetation programs where appropriate.*

This Swift Parrot habitat expansion is to be implemented in accordance with the approved Augusta Estate VMP which outlines the methods of re-establishing connected Cumberland Plain Woodland (CPW) in the Augusta Estate conservation areas.

The natural resilience of the proposed extended Conservation Area A is generally low. The works required in the extension area include:

- primary weed control
- creating final landforms
- soils preparation
- ongoing secondary weed control, followed by establishing early colonising species such as Bursaria spinosa, Indigofera australis and Hardenbergia violaceae
- native tree planting

Conservation assets on the Augusta Estate are limited. They include:

- limited native seed sources for direct seeding and propagation
- native tree biomass, especially seed bearing upper eucalypt branches

- extensive non-woody weeds and weedy topsoil (details in Objective 5 of the VMP)
- abundant woody weeds in the drainage swale (details in Objective 5 of the VMP).

These resources are to be collected and used in the conservation areas. Weeds are to be rafted into windrows, providing erosion control and returning carbon to the scalped soils. Further details are provided in Section 4.3.4 of the VMP.

In addition to direct transfer of native biomass to the conservation areas, seed collected onsite or nearby is to be propagated, as available, in specialist nurseries to be ready for planting as specified by the Environmental Manager. Nursery stock grown from collected seed should be ready as planting areas become available.

Dense row planting of tubestock is to occur along contours separated by strips of bare soil to allow ready weed control and germination from the developing seed bank. Species selection is provided in the VMP in Section 4.3.7 Management Objective 7 – Habitat enhancement for native fauna species and increasing connectivity. Planting / direct seeding in Conservation Areas A and B is for the reconstruction of a native woodland with long-term targets for plant species' cover and diversity based on the CPW bench marks (details in Objectives 4, 9 of the VMP). In accordance with the approved Augusta Estate VMP, the long term targets for the existing and the extended Conservation Area A are:

- At least 15% cover by canopy species
- At least 2 tree species (Eucalyptus tereticornis and E. moluccana)
- At least 3 shrub species
- At least 5 groundcover species
- Less than 20% bare ground
- <5% weed cover.

Note: In areas where the vegetation is predominantly exotic grasses and other weeds and it may be difficult to achieve the 5% weed cover target. For this area less than 30% weed cover may be all that can be achieved.

Blacktown City Council		
The Modification Application does not adequately quantify or assess the extent of proposed tree removal under this modification application. Specifically, no information has been provided regarding the number, species, size, health, or precise locations of trees proposed to be removed, and no Arboricultural Impact Assessment or Arborist Report has been submitted in support of the application. *Please provide a comprehensive Arboricultural Impact Assessment prepared by a suitably qualified arborist. Until this information is provided, we are unable to fully assess the environmental impacts of the proposed modification, including the extent to which existing tree canopy and vegetation values will be affected.*	Arboricultural Impact Assessments reports provide an assessment on the health and vigour of trees, while confirming whether a proposed development would result in the need to remove a tree. That is, the report itself does not qualify or quantify whether a tree can be removed based on opinion, other than circumstances where the tree is in ill-health or posing a risk to public safety. In an instance where the tree removal is required, and the assessment of that impact is undertaken via a Biodiveristy Development Assessment Report (**BDAR**), the provision of an arborist report would provide no added benefit to the assessment of impact related to tree removal. The applicant's obligations for providing an adequate assessment of impact have been fulfilled via the provision of a BDAR. No further arboricultural reporting is considered necessary.	n/a

3 Additional Modification Scope Plan Amendments

As has been discussed with the DPHI, part of the ongoing design development has been identified that Warehouses 1-4 may require a reduced overall building height. It is noted that the maximum approved building height is 16.8m.

The applicant proposes to include a tolerance to the approved building height allowing for a ridge height of Warehouses 1-4 at 14.6m minimum, and 16.8 maximum (variance of 1.2m). This tolerance is shown on all relevant architectural plans which are intended to form part of this modification (see example image at Figure 1 below).

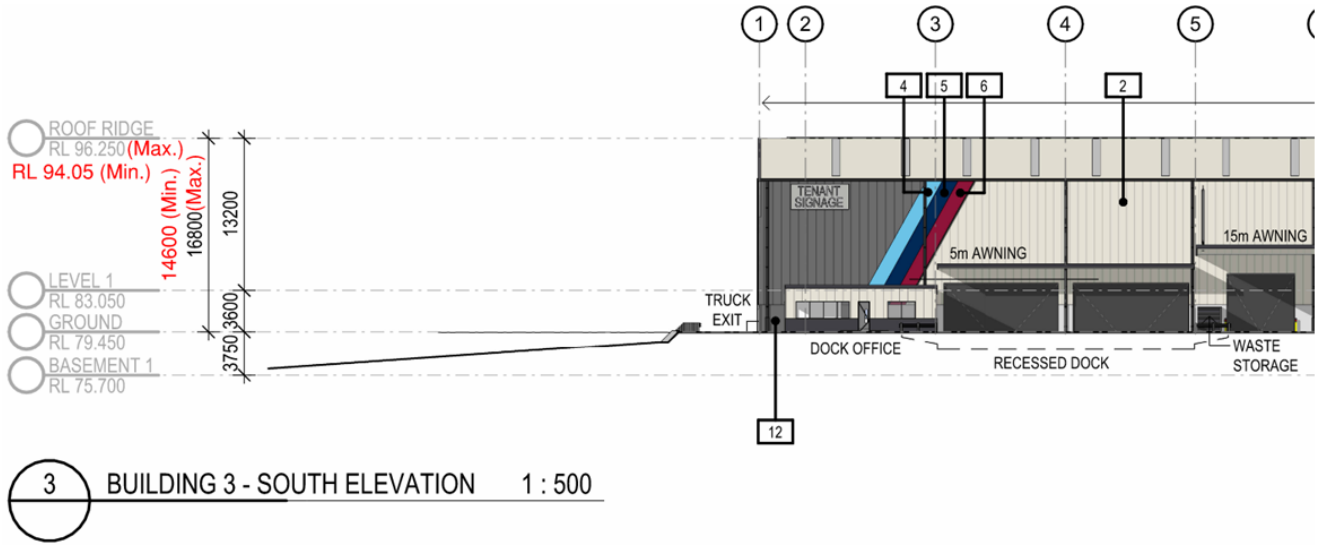
Updated plans are included with this RFI response, including a maximum height tolerance range of 1.46m to 16.8m from the approved bul earthworks level on the site.

The updated plans include:

- DA120 – Building 1 – Office Plans – 05/06/2026
- DA130 – Building 1 – Elevations – 28/08/2026
- DA140 – Building 1 – Sections – 28/08/2026

- DA220 – Building 2 – Office Plans – 28/08/2026
- DA230 – Building 2 – Elevations – 28/08/2026
- DA240 – Building 2 – Sections – 28/08/2026
- DA300 – Building 3 & 4 – Site & Basement Plan – 05/06/2026
- DA301 – Building 3 – Site Plan – 01/09/2026
- DA320 – Building 3 – Office Plans – 05/06/2026
- DA330 – Building 3 – Elevations – 01/09/2026
- DA340 – Building 3 – Sections – 28/08/2026
- DA420 – Building 4 – Office Plans – 05/06/2026
- DA430 – Building 4 – Elevations – 28/08/2026
- DA440 – Building 4 – Sections – 28/08/2026

Figure 1 Example Update to Approved Building Heights (Warehouse 3)



Due to the minor nature of the changes, the applicant is of the view these changes can be included in the current modification without the need to renotify the application for the following reasons:

- The proposed changes to the approved building height would, on warehouses of this scale, be imperceivable when constructed.
- Known impacts resulting from building height would, if anything, be improved should the lower height be constructed.
- Tolerances in approved earthworks / pad levels is commonplace in projects of this scale. Allowing a tolerance in building height will ensure an outcome which is equal to, or better than the anticipated outcome for the site from an environmental impact perspective.

It is therefore requested that the approved plans listed within Condition 1 of the consent are updated to reflect the revised architectural set provided with this RTS package.

4 Conclusion

We trust that the information provided in this letter and the supporting documentation satisfactorily responds to the request for information and enables DPHI to finalise the assessment of the proposed Mod 2. If any additional information is required or queries arise, please do not hesitate to reach out to the undersigned.

Kind regards,



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