



Your ref: SSD-36138263  
Our ref: DOC24/244036

Mr Shaun Williams  
Senior Environmental Assessment Officer  
Department of Planning, Housing and Infrastructure  
4 Parramatta Square, 12 Darcy Street  
PARRAMATTA NSW 2124

Dear Mr Williams

Thank you for your email dated 27 March 2024, seeking comments from the Biodiversity Conservation and Science Group (BCS) on Augusta Street Warehouse and Distribution Centre (SSD-36138263).

In preparing this advice, BCS has reviewed the following documents:

- Biodiversity Development Assessment Report for the proposed Augusta Street warehouse and distribution centre in Huntingwood (prepared by Anne Clements and Associates, 24 March 2024)
- *Submissions Report SSD-36138263 | Augusta Street Warehouse and Distribution Centre* (prepared by Urbis, 26 March 2024)

Please note, issues that were raised in BCS's submission on the EIS that are not listed below are considered by BCS to be resolved.

To allow BCS to finalise its review of the BDAR, the assessor must address all the matters raised by BCS at Attachment A prior to determination.

If the Department of Planning, Housing and Infrastructure (DPHI) proceeds to approving this project, BCS requests DPHI to not assign a role for BCS in the conditions of consent unless BCS agrees to the role and the condition.

If you have any questions about this submission please contact Liz Peterson, Senior Conservation Planning Officer via [elizabeth.peterson@environment.nsw.gov.au](mailto:elizabeth.peterson@environment.nsw.gov.au).

Regards

19/04/2024

Susan Harrison  
Senior Team Leader  
**Greater Sydney Branch**  
**Biodiversity and Conservation**

**Attachment A – BCS Comments on the Augusta Street Warehouse and Distribution Centre (SSD-36138263).**

|              |                                                                                                                                                                                    |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BCS Issue ID | There is no discussion of limitations of the survey                                                                                                                                |
|              | The BDAR provides some discussion of limitations of species that were surveyed, but there is no discussion of whether there were any limitations for groups beyond those surveyed. |
| Recommend    | Include a discussion on the limitations of the survey, for the species or groups that were not surveyed.                                                                           |

|              |                                                                                                                                                   |
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| BCS Issue ID | There is no discussion of the use of planted and non-native vegetation as foraging and roosting habitat, in the discussion of prescribed impacts  |
|              | The BDAR responded by providing details on the limitations of the survey, which is not relevant.                                                  |
| Recommend    | Provide further detail in the discussion of prescribed impacts, on the use of planted and non-native vegetation as foraging and roosting habitat. |

|              |                                                                                                                                                                |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BCS Issue ID | The consideration of serious and irreversible impacts has not addressed the required criteria in section 9.1.1 of the BAM.                                     |
|              | The amended BDAR has applied the principles for determining serious and irreversible impacts. It has not addressed the factors under Section 9.1.1 of the BAM. |
| Recommend    | Prepare an assessment in accordance with section 9.1.1 of the BAM                                                                                              |

|              |                                                                                                                                                                   |
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| BCS Issue ID | The BDAR has been reviewed without access to the case in the BAM-C.                                                                                               |
|              | The BDAR states that Greater Sydney – Compliance and Regulation' have been added to the case in the BAM-C. However, BCS still cannot access the case in the BAM-C |
| Recommend    | The assessor must submit the case in the BAM-C to the consent authority.                                                                                          |

|              |                                                                                                                                                                                                            |
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| BCS Issue ID | The BDAR has also been reviewed without access to the spatial data.                                                                                                                                        |
|              | The BDAR states that BAM checklist in Table 24 and 25 of the BDAR has been saved in the parent case of the BAM-C. However, as stated above, BCS cannot access the case, so cannot access the spatial data. |
| Recommend    | The assessor must submit the case in the BAM-C to the consent authority.                                                                                                                                   |

**End of Submission**