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3 September 2026

Att: Will Dwyer
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Re: Response to Development Coordination Authority (DCA) Technical advice for SSD-36138263- MOD-2

1. Project details

Project name:	Augusta Street Warehouse MOD-2 – Warehouse Layout amendment
DPHI/Major Projects reference	SSD-36138263
Description of development (related to Biodiversity)	... Tree removal, and earth works within the road reserve of the Great Western Highway and along the northern portion of the site within the site boundary.
Response prepared by:	Dr AnneMarie Clements, Dr Anne Baumann, Caitlyn Birrell

2. Assessment section

2.1 Development Coordination Authority Environment, Biodiversity & Heritage Advisory

Biodiversity	
Advice summary	*Access to the Augusta Estate is via the Great Western Highway (GWH). It is understood that TfNSW has specified the requirements for the proposed slip lane and share path. While there appears to be limited scope to modify their location, further information is required to address the requirements of the Biodiversity Assessment Method (BAM) 2020, specifically:* • *impact to native vegetation* • *proposed mitigation measures.*
Detailed advice and recommendations	***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 calculation as relevant.
	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.*
Documents reviewed	• *Biodiversity Development Assessment Report for the additional clearing associated with the Great Western Highway Upgrade for: Augusta Estate: SSD 36138263 MOD 2.* • *Modification Application: Augusta Street Warehouse and Distribution Centre MOD 2. Dated July 2026.*
Additional information	*None*

In response:

Item 1. Native vegetation impacts
The Ground disturbance area shown in Figure 7a 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:

Assumed PCT	Sampled in	Vegetation Condition	Composition condition score	Structure condition score	Functional condition score	Current vegetation integrity score
PCT 3319 *Cumberland Shale*	Plot 7	Moderate	72	46.7	74.5	63

Assumed PCT	Sampled in	Vegetation Condition	Composition condition score	Structure condition score	Functional condition score	Current vegetation integrity score
Hills Woodland						

This strip of roadside vegetation is mapped on the Biodiversity Values Map (Figure 2e of the Augusta Estate BDAR), hence clearing of this vegetation would trigger the Biodiversity Offset Scheme, if it had not already been approved for clearing.

Item 2. Mitigation measures

Location and extent of the proposed conservation area expansion

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 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;* and
- 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); and
- 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; and
- <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].

References

Clements A, Baumann A, Rodd T, Dever P, Harding T (2024a). *Biodiversity Development Assessment Report for the proposed Augusta Street warehouse and distribution centre in Huntingwood.* Report prepared for The Trustee for Huntingwood Property Trust. Revision 5. Dated

6 August 2024.

Clements A, Baumann A, Rodd T, Harding T (2024b). *Vegetation Management Plan for Conservation Areas associated with the proposed Augusta Street warehouse and distribution centre in Huntingwood.* Report prepared for The Trustee for Huntingwood Property Trust. Revision 3. Dated 5 August 2024.

Clements A, Baumann A, Rodd T, Birrell C, Moskina E (2026) *Biodiversity Development Assessment Report for the additional clearing associated with the Great Western Highway Upgrade for Augusta Estate: SSD 36138263 MOD 2.* Report prepared for The Trustee for Huntingwood Property Trust. Revision 1. Dated 9 July 2026.

Figures
From the Augusta Estate 2024 BDAR

1f. Landscape Strategy (Habit8 – Project No. H8-22032, Rev. N, Dated 29.07.2024)

2e. Site boundary overlaid on the Biodiversity Values map – version 16

6c. Sampling locations overlaid on Vegetation Mapping

From the 2026 MOD 2 BDAR

5f. Important Habitat map for the Swift Parrot

7a. Vegetation mapping within MOD 2 ground disturbance area

7b. Vegetation impacted within MOD 2 ground disturbance area

Additional figures

A. Vegetation clearing along Flushcombe Road

B. Proposed extension to Conservation Area A

Appendix

1. Engineering Delegated Authority Approval dated 27 February 2025