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Mr Jason Chen
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SYDNEY NSW 2000

By email: jchen@eg.com.au

Our reference: LCC 21-1159

23rd November 2021

RE: Proposed development at 1411 The Northern Road, Bringelly

Dear Jason,

This letter is provided to address ecological outcomes arising from proposed development of 1411 The Northern Park Bringelly (Lot 6 DP1217784) in the Liverpool LGA.

This lot is currently zoned RU4 Primary Production Small Lots, and has historically been used for such a land use, with a dwelling, shed, dam, and a market garden evident in available current and historical aerial photography – see Figure 1.

The site is located within the Dwyer Road Precinct that is associated with the Western Sydney Aerotropolis, and I understand that it is anticipated that the zoning in and around this lot may change to reflect the strategic planning needs of this rapidly developing part of Sydney. Further, I understand that EG Property Advisory is in favour of an Enterprise Zoning that would allow for development of a service station and take-away food premises. It is this concept that I address here regarding ecological matters.

The subject lot is within the South West Growth Centre and its development is therefore controlled by the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (the *Growth Centres SEPP*). As Biodiversity Certification has been granted over the Growth Centres SEPP, impact assessments for threatened entities no longer need to be undertaken: threatened biodiversity losses have already been offset elsewhere in the Growth Centre.

The relevant mapping that is part of *Growth Centres SEPP* does not show native vegetation, offset lands, or otherwise protected lands in or near the subject property.

Notwithstanding this biocertification, best practice land development provides the opportunity to consider the ecological values of each site outside of the context of impact assessment, but within other statutory controls.

Biodiversity in and around the Dwyer Road Precinct has been assessed by others[1] as as part of the investigations for the Western Sydney Aerotropolis. That study identified important biodiversity features across the landscape:

- **Areas of native vegetation.** Native vegetation in this part of western Sydney is significant given the long history of clearing and farming: remnant or regrowth patches are generally rare and comprise endangered ecological communities. However, no native vegetation is recognised on the subject site – see Figure 2.
- **Riparian land.** Land associated with watercourses is valuable in many ways: it is part of the catchment, it protects the structural integrity of the watercourse, it maintains the water quality, and provides habitat for specific vegetation and fauna. Two first order streams are mapped on site: one follows approximately the western boundary, and the other crosses the south eastern corner – see Figure 3. The western arm arises on site and has the small dam located on it, while the other arises in a property to the north. These meet to the south of the subject lot and form a tributary of Moore Gully that heads east, eventually flowing into South Creek. There is no evidence from topographic survey or aerial photography that these mapped stream heads on site exhibit any creek morphology (e.g. beds or banks) or carry water. They instead manifest as shallow depressions along which overland flow and subsoil moisture is directed.
- **Habitat connectivity.** Areas of vegetation that are connected, or close enough to provide stepping stones of habitat for the movement of flora and fauna are particularly important in a highly fragmented landscape such as in this part of western Sydney. However, canopy trees are almost entirely absent from the subject lot, it is surrounded by similarly cleared properties, and has frontage to a busy arterial road. Therefore it provides little contribution to local or regional habitat connectivity – see Figure 4.

The lot's current ecological values are:

- **Small dam as a source of open water.** This may be principally of value to mobile species such as birds and bats.
- **Planted trees along front boundary and a few scattered trees elsewhere on the property.** These may have value as habitat for other species, or intrinsic value as a vegetation community.
    - Given the young age of the majority of the trees on site and their location within a largely cleared agricultural landscape, these trees are likely to provide shelter and foraging resources for only a few species, and probably only common birds adapted to fragmented landscapes.
    - The native trees on site are likely to be species characteristic of Cumberland Plain Woodland, a Critically Endangered Ecological Community. The relative value of

[1] *Western Sydney Aerotropolis – Draft Biodiversity Assessment* prepared by EcoLogical Australia, version 6, dated 14 December 2020

the scattered and planted trees has been assessed as part of the *Growth Centres SEPP* and their loss offset through that same instrument.

- **Potential to provide threatened species habitat.** Given the degree of clearing, the types of land use of the site and surrounds, and the depauperate habitats available, there is little likelihood for threatened species to occur.

A site's ecological value should also be judged in terms of its relationship to other areas. To this end, the proximity of the site to areas recognised as being important to particular species was also explored – see Figure 5. This shows that important habitat areas for the Regent Honeyeater (Critically Endangered) and the Swift Parrot (Endangered) identified across the Cumberland Plain are all distant from the subject site. This distance - plus the absence of suitable habitat for these threatened species on site and in the site's immediate surrounds - mean that it is unlikely to play any role in the movement of these species through the landscape.

During development, it will be important to control activities that have the potential to impose environmental harm, such as pollutant spills or mobilisation of soil during construction. Such actions are routinely controlled by standard civil construction management plans.

In the post-development landscape, it will be important to prevent pollution of the underlying water table or downslope environments from faulty fuel tanks or hydrocarbon spills. Again, such controls are provided by design and construction to the relevant safety standards, as well as the implementation of standard management systems.

Soft landscaping may provide amenity, habitat, and other ecological services and so the planting palette should be at least partially informed by the locally-native species and vegetation communities.

In summary, the site does not contain important ecological values of note. The general absence of ecological constraints are properly reflected in the relevant strategic planning documents. The biodiversity features of the site provide no additional constraint to an Enterprise land zoning and subsequent development for service station / take away food outlet.

Yours sincerely,

Elizabeth Ashby
Principal Consultant

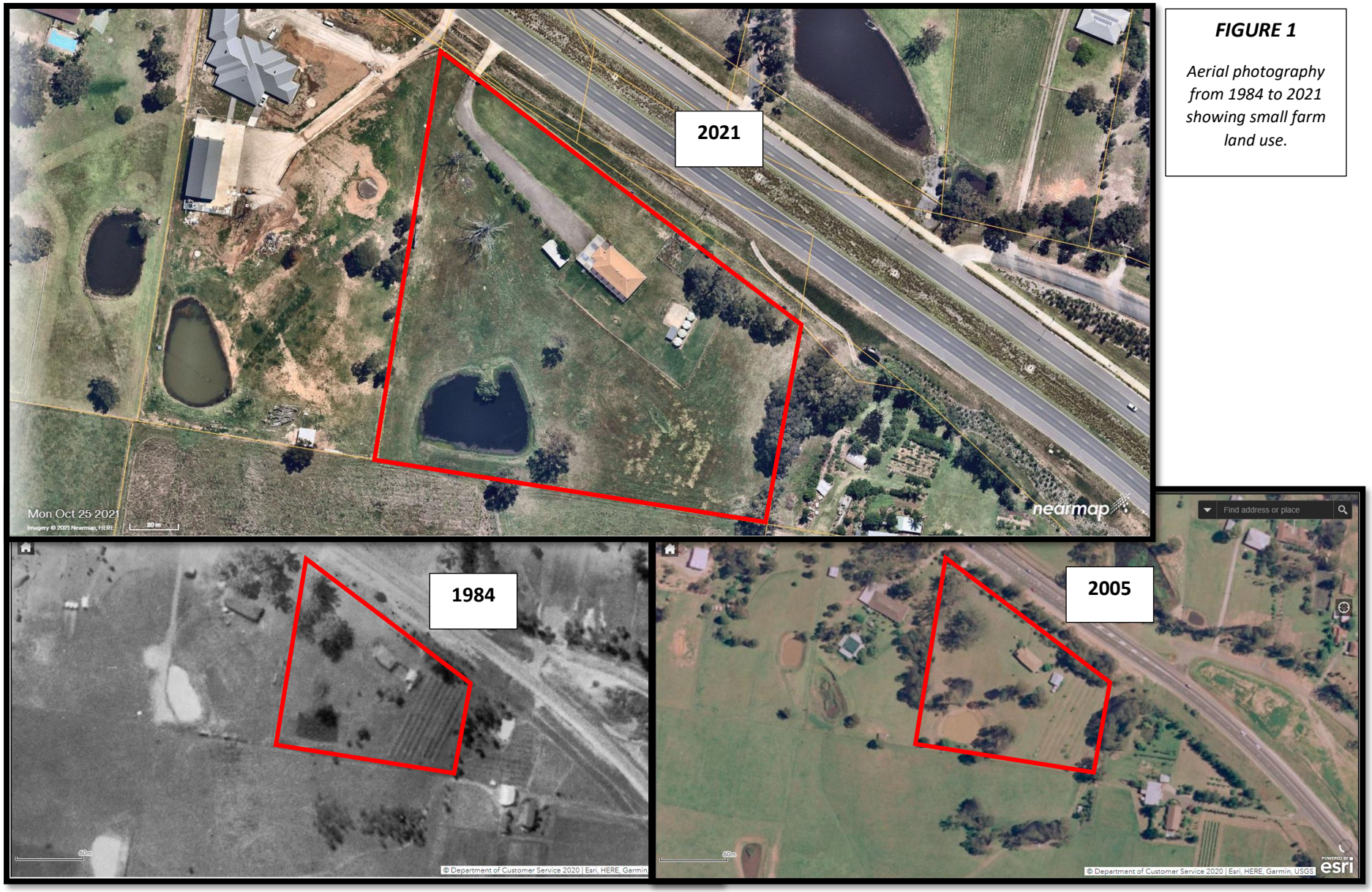


FIGURE 1

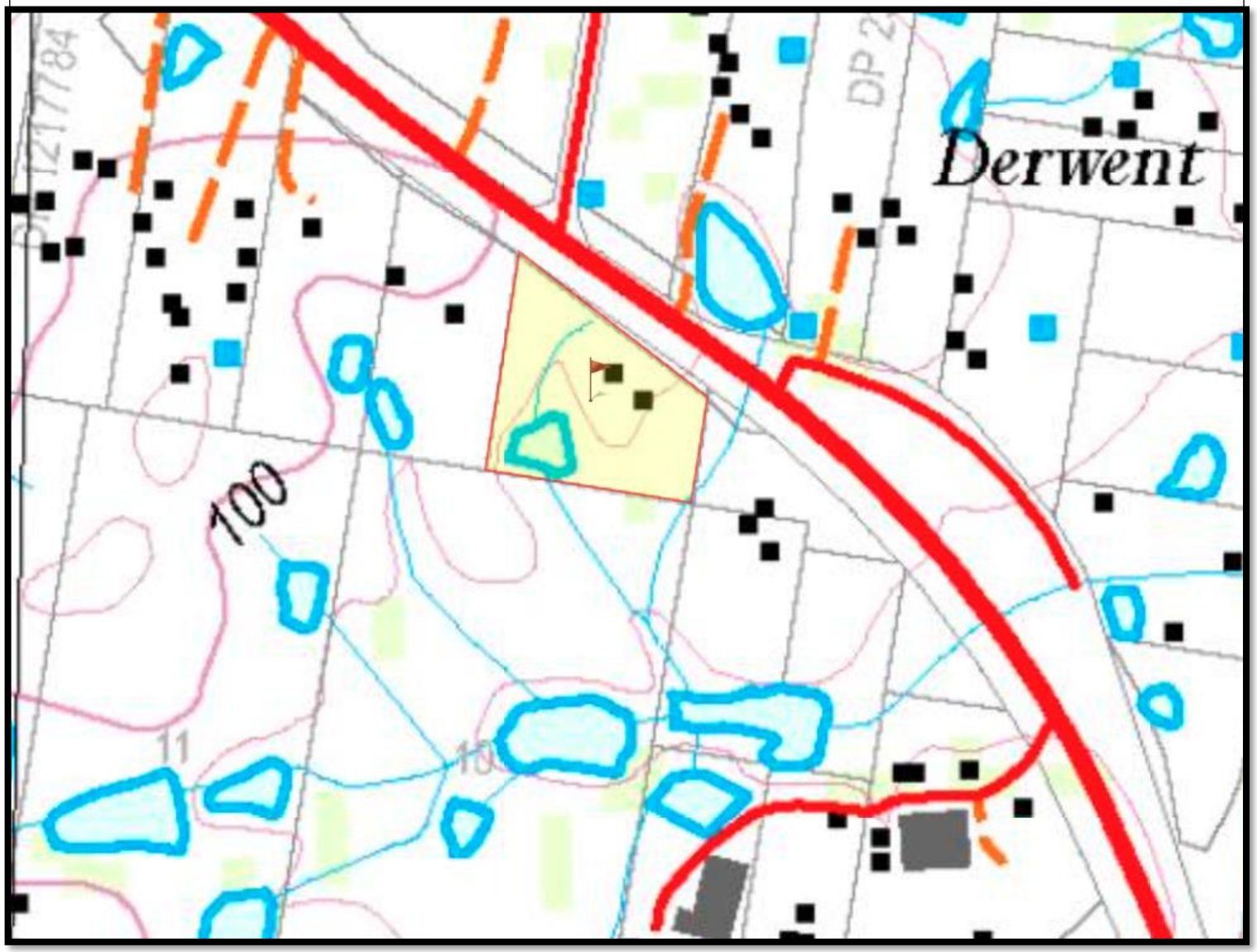
Aerial photography from 1984 to 2021 showing small farm land use.

FIGURE 2

Native vegetation mapping – none recognised on the subject site.

FIGURE 3

First order streams and the subject site.



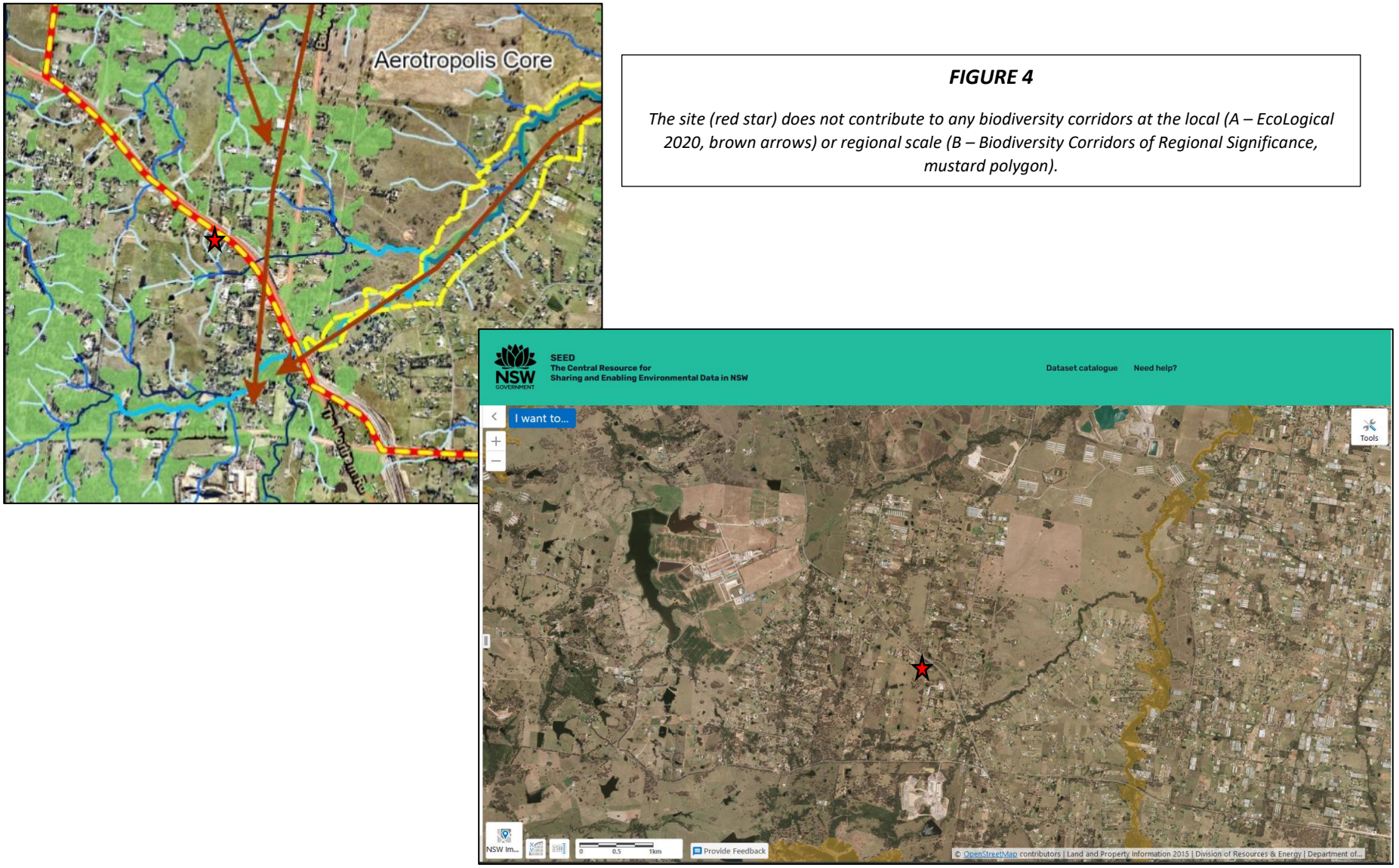


FIGURE 4

The site (red star) does not contribute to any biodiversity corridors at the local (A – EcoLogical 2020, brown arrows) or regional scale (B – Biodiversity Corridors of Regional Significance, mustard polygon).

FIGURE 5

The site (yellow circle) is distant from important areas of habitat for Swift Parrot (purple) and Regent Honeyeaters (green). The blue areas represent important habitat for migratory shorebirds and are not relevant to the terrestrial woodland habitats on the Cumberland Plain.