Oakdale West Industrial Estate Buildings 4C & 4D

Biodiversity Impact Assessment

prepared for

Goodman Property Services (Aust.) Pty Ltd

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Oakdale West Industrial Estate - Buildings 4C & 4D - Biodiversity Impact Assessment

prepared for

Goodman Property Services (Aust.) Pty Ltd

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16/01/2023

Revision Schedule

Rev No	Date	Description	Issued to
1	14/11/2022	DRAFT Biodiversity Impact Statement (BIA)	Goodman
2	16/12/2022	BIA for DA submission	Goodman
3	16/01/2023	BIA for DA submission - amended masterplan	Goodman

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1. Introduction

1.1. Background

écologique has been engaged by Goodman Property Services (Aust.) Pty Ltd (Goodman) to provide a Biodiversity Impact Statement to support the development application (DA) for the proposed industrial buildings 4C and 4D at the Oakdale West Industrial Estate (the Estate).

The Estate which comprises 154 hectares of land within the Western Sydney Employment Area (WSEA) and is owned by a Joint Venture (JV) between Goodman and Brickworks Limited.

The Estate is subject to State Significant Development consent no. SSD 7348, approved on 13 September 2019.

Most biodiversity related SSD 7348 consent conditions were specific to both pre-construction and the construction (i.e., bulk earthworks) for the SSD 7348 Concept Plan and Stage 1 development phase. The key consent conditions, which have been completed compliantly relate to the following:

- Retirement of 172 ecosystem credits, under the NSW Biodiversity Offsetting Scheme, to offset the removal of native vegetation on the Estate; and
- Preparation and implementation of a Flora and Fauna Management Plan (FFMP) as a subplan to the SSD 7348 Construction Environmental Management Plan (CEMP).

The proposed buildings will be assessed as local development and Penrith City Council (Council) the consent authority.

Under the Penrith Development Control Plan 2014 (DCP) development consent is required for any removal, clearing or otherwise harm caused to any tree or other vegetation, which is proposed as part of development.

The information in this report is provided as evidence that the proposed DA will not result in any removal, clearing or harm to vegetation or any biodiversity values.

The evidence provided is considered to sufficiently justify that further assessment of matters relating to biodiversity values under the DCP and relevant State and Federal legislation is not required.

1.2. Subject site

Within the context of the Estate, the subject site is located at the northern end of Precinct 4, which is bounded by the future Southern Link Road to the west, Transgrid easement to the east and Buildings 4B and 4E to the south (see Figure 1-1).

Substantial cut and fill earthworks have been undertaken across the Estate with retained native vegetation located outside of the developable precinct areas.

No native vegetation or fauna habitat features have been retained within the subject site.

The majority of retained native vegetation is protected in Biodiversity Management Areas (BMAs) with additional patches of native vegetation located in easements that will not be developed (see Figure 1-1).

As shown in Figure 1-1 the subject site is located proximal to an isolated stand of remnant vegetation (approximately 0.45ha in extent) located in the adjacent Transgrid easement. This vegetation is separated from the subject site by a sealed access road and the subject site is already benched, serviced and ready for aboveground construction (see Figure 1-2).

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Oakdale West Estate Buildings 4C-4D

Fig. 1-1. Site Context







Figure 1-2. Remnant vegetation in adjacent easement

1.3. The proposal

The Development consists of two (2) new warehouse buildings each with ancillary office facilities, external hardstand spaces, staff carparking, landscaping and solar panels.

Approval is requested for the construction, operation and use, and fit-out of the buildings.

The following key features are proposed

- Building 4C spans 30,020 sqm of warehouse space and 1,200 sqm of office space, creating a total Gross Lettable Area of 31,220 sqm and a proposed ridge height of 14.6m.
- Building 4D spans 5,200 sqm of warehouse space and 400 sqm of office space, creating a total Gross Lettable Area of 5,600 sqm and a proposed ridge height of 14.6m.
- 24/7 operations with a focus on warehouse and industrial use.

The proposed developments comply with MOD 12 of SSD 7348 Concept Plan that is currently with the Department of Planning and Environment (DPE) for assessment.

An indicative layout of the proposed development is shown in Figure 1-3.

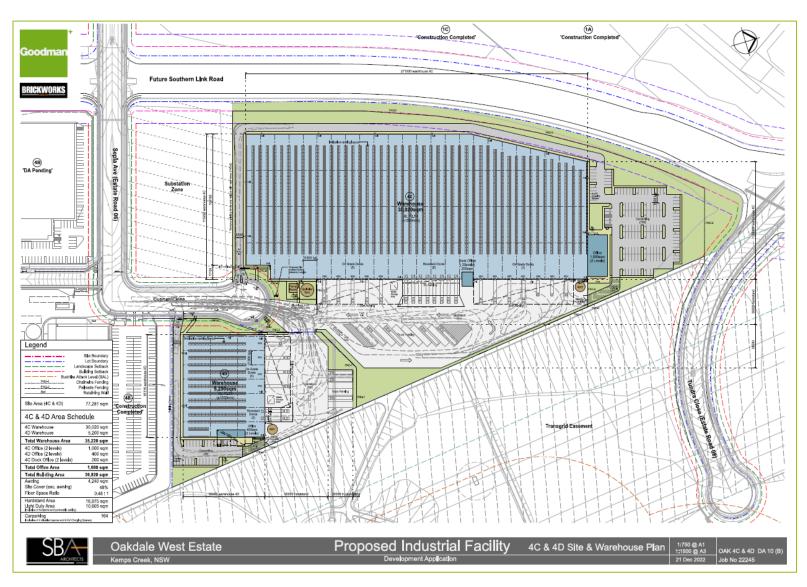


Figure 1-3. Proposed development layout

Biodiversity Impact Assessment

Consent conditions

SSD 7348 included provisions for native vegetation clearing of approximately 4.38ha. No additional vegetation clearing is required as a result of the proposed development.

Vegetation clearing approved under SSD 7348 comprises threatened ecological communities under both the NSW *Biodiversity Conservation Act 2016* (BC Act) and the National *Environment Protection and Biodiversity Conservation Act 1999* (EBPC Act).

Table 2-1 summarises the history of all relevant SSD 7348 consent conditions and the status of each condition, as they relate to biodiversity matters and Section 2.2 summarises compliance with an approved controlled activity under the EPBC Act.

Table 2-1. Summary of relevant biodiversity consent conditions

SSD 7348 con	sent condition	Status
D88.	The Applicant must prepare a Flora and Fauna Management Plan (FFMP) for Stage 1, to the satisfaction of the Planning Secretary.	Completed compliantly (see Section 2.1)
D89.	Bulk earthworks are not to commence until the FFMP is approved by the Planning Secretary and the most recent approved version of the FFMP is to be implemented for the duration of bulk earthworks and construction.	Completed compliantly
D90.	Within 12 months of the date of this development consent, or as otherwise agreed with the Planning Secretary, the Applicant must retire 172 ecosystem credits to offset the removal of 4.41 hectares of native vegetation on the Site.	Amended in MOD 1
D90.	Within 12 months of the date of this development consent, or as otherwise agreed with the Planning Secretary, the Applicant must retire 173 ecosystem credits to offset the removal of 4.38 hectares of native vegetation on the Site.	Completed compliantly
D91	The Applicant shall establish a Biodiversity Offset Area on the Site, consistent with the area described in the RTS, in accordance with a Biodiversity Stewardship Agreement with the Biodiversity Conservation Trust.	Deleted in MOD 1
D92	The Applicant must maintain the Biodiversity Offset Area on the Site in accordance with a Biodiversity Management Action Plan approved by the Biodiversity Conservation Trust (BCT).	Deleted in MOD 1
MOD 1	SSD 7348 Conditions D91 and D92 deleted and new Condition D91 inserted as follows: D91. Within 12 months of the date of the approval of MOD 1, or as otherwise agreed with the Planning Secretary, the Applicant must prepare and implement a VMP for the restoration and rehabilitation of 4.2 ha of Riparian Corridor adjacent to Ropes Creek to meet the objectives of the Water Management Act 2000.	Amended in MOD 6
MOD 6	 Approval granted to amend the VMP extent as follows: Remove locations adjacent to the future SLR (due to future disturbance from its construction) Increase the extent from 4.2 to 4.45 ha 	Completed compliantly

SSD 7348 con	sent condition	Status
	Provide a wider riparian zone, which connects to isolated patches of retained vegetation	
	D93. Within 12 months of the date of this development consent, or as otherwise agreed with the Planning Secretary, the Applicant must:	
SSD 7348	Offset 0.42ha of vegetation lost in the Erksine Park Biodiversity Corridor as a result of the WNSLR by carrying out planting within the area shown in the green edging on Figure 9 (Appendix 6 of consent conditions). Plant the areas shown in the green edging on Figure 9 (Appendix 6 of consent conditions) with species similar to those identified for zone 4a, on the south-eastern side of Ropes Creek, in the Biodiversity Management Plan Erskine Park Employment Area (HLA-Envirosciences, 2 May 2006).	Amended in MOD 5
MOD 5	MOD 5 sought to amend the area within which offsetting is take place due to this area no longer being available for this purpose. In consultation with the Planning Ministerial Corporation a new location has been agreed on and a VMP prepared and submitted with MOD 5 that details the amended location and methods in which the now obsolete Condition D93 will be fulfilled. Conditions D94 and D95 remain unchanged.	Completed compliantly
D94	The Applicant shall monitor and maintain the planting for a period of six months to ensure a minimum 85% planting survival rate.	Completed compliantly
D95	The Applicant must notify the Planning Ministerial Corporation at least one month before the completion of planting to enable the Planning Ministerial Corporation to arrange ongoing maintenance.	Completed compliantly
D96	Prior to construction of Stage 1, the Applicant must implement snake management measures to limit, to the extent practicable, movement of snakes from the Site into the adjacent school and retirement village on the western boundary of the Site. The measures (provision of alternative snake habitat on Site, fencing along the western boundary and installation of snake deterrents) shall be detailed in the CEMP.	
MOD 7	Minor change to building layouts across Precinct 3 and 4, namely Lot 3B, 3C, and 4E, which results in minor amendments to the estate infrastructure including bulk earthworks in both precincts, the removal of an Estate Road in Precinct 4, and inclusion of additional retaining walls in Precinct 3 & 4	
MOD 8	Modifications to approved plans for Warehouses 1A, 1B and 1C	
MOD 9	Changes associated with the Modifications to the Concept Plan including	
MOD 10	Changes to Precinct 1 signage plans, including façade signage, amendments to GFA values in Precincts 3 to 5 and changes to Precinct 5 design.	Not applicable - no change to biodiversity conditions
MOD 11	Changes to the concept approval to reflect the development applications (DAs) lodged with Penrith City Council for the Amenity Precinct, Lot 3C and Lot 5.	

2.1. Flora and Fauna Management Plans

Implementation of the Oakdale West FFMP (écologique, 2020) ensured that the following key biodiversity condition requirements were completed compliantly:

- Clearing of native vegetation 4.38 hectares of native vegetation and potential fauna habitat as a component of the site's bulk earthworks;
- Decommissioning of four farm dams, including the capture and relocation of native aquatic fauna;
- Installation of snake deterrent fencing along the western boundary of Oakdale West and snake habitat within the north-western biodiversity management area (BMA); and
- Relocation of large woody debris to the north-western and eastern BMA areas.

Subsequent FFMPs have been prepared to support staged development across the Estate and operational phase of the Estate as follows:

- Buildings 1B and 1C FFMP (16/02/2021)
- Building 3A FFMP (12/05/2021)
- Building 3B FFMP (03/09/2021)
- Building 4E FFMP (20/10/2021)
- Building 2A FFMP (13/12/2021)
- Oakdale Estate Operational FFMP (24/03/2022)
- Buildings 2C and 2D FFMP (07/04/2022)
- Building 1A FFMP (02/09/2022
- Building 4E SSD FFMP (20/10/2022)
- Buildings 5A and 5B DA FFMP (13/12/2022)

2.2. EPBC Act controlled action

Consent for SSD7348 approved the removal of approximately 4.4 hectares (ha) of remnant native vegetation, which included 2.06 ha of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest¹.

Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (CPW) is a critically endangered community under the *Environmental Protection and Biodiversity Conservation Act* 1999 (EPBC Act).

Approval to clear no more than 2.06 ha of CPW was initially granted by the Australian Government under section 75 of the EPBC Act on the 31 August 2017 (EPBC 2017/7952).

All relevant consent conditions associated with EPBC 2017/7952 have been complied with. An extract from the final Annual Report submitted to the Australian Department of Agriculture Water and Environment is provided in Appendix B.

¹ Both Cumberland river-flat forest (PCT 835) and Cumberland swamp oak floodplain forest (PCT 1800), which are present within the Estate were listed as threatened ecological communities under the EPBC Act post SSD 7348 approval.

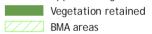
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Oakdale West Estate Buildings 4C & 4D

Figure 2-1. FFMP context

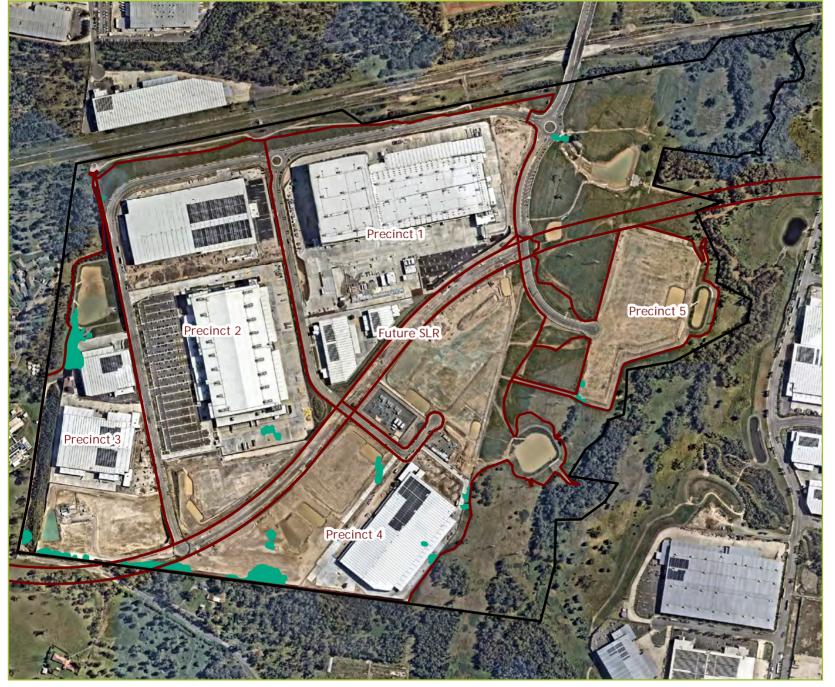






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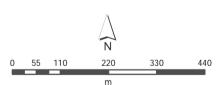
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Oakdale West Estate Buildings 4C & 4D

Figure 2-2. EBPC context





Coordinate System: MGA Zone 56 (GDA 2020) | Image sources: Nearmap 29 October 2022

3. Conclusion

The proposed DA will not result in any removal, clearing or harm to vegetation or any biodiversity values.

The subject site has been cleared compliantly with the Oakdale West SSD7348 concept plan consent and does not contain any vegetation or manmade structures that provide habitat for threatened species.

Proximal remnant vegetation is located within the adjacent easement (which is separated from the site by a sealed access road) and will not be impacted by the proposal.

Direct and indirect impacts of the Estate's operation on biodiversity values have been assessed and offset under the Oakdale West SSD7348 concept plan approval.

Further assessment of matters relating to biodiversity values under the DCP and relevant State and Federal legislation is not required.

Attachment A. Offset payment confirmation



Credit retirement report

Effective date: 11-August-2020

Transaction number: 202008-RT-558

Credit owners' details

Credit owner ID: 690

Name of credit holder: BGMG 11 Pty Limited as trustee for BGMG 1 Oakdale West Trust

Other owner(s):

No other owners

Reason for retirement: to meet part of the biodiversity credit development obligation for SSD 7348.



	Ecosystem credit(s) retired							
Number of credits	Credit profile ID	Agreement ID	Vegetation code	Vegetation type	CMA subregion	% surrounding vegetation	Patch size	Vegetation formation(see key)
18	3,287	413	HN528	HN528/Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	Cumberland - Hawkesbury/Nep ean	11-30%	<5 ha	GRW
22	2,596	283	HN528	HN528/Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	Cumberland - Hawkesbury/Nep ean	>70%	<5 ha	GRW
28	3,509	447	HN529	HN529/Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion	Cumberland - Hawkesbury/Nep ean	31-70%	<5 ha	GRW
2	3,514	447	HN529	HN529/Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion	Cumberland - Hawkesbury/Nep ean	31-70%	<5 ha	GRW



Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation

Pursuant to section 6.33 of the *Biodiversity Conservation Act 2016*, the NSW Biodiversity Conservation Trust confirms that the following payments have been made into the Biodiversity Conservation Fund under section 6.30(1) of the Act to satisfy an obligation to retire biodiversity credits.

Payment made by:	Goodman Property Services (Aust) Pty Ltd
Date received:	13/08/2020
NSW statutory obligation reference ¹	SSD 7348
Commonwealth EPBC Act controlled action reference (if applicable) ²	
BCT Reference	BCF123

Der nererense	50, 125				
Biodiversity credit retirement obligations satisfied by payment to the Biodiversity Conservation Fund:					
Biodiversity credit type (Credit ID and name)	Offset trading group	EPBC Act Controlled	Number of	Cost per credit	Total payment per
(c. cancil and name,		Action	credits	or can	credit type
		offset			
		obligation			(Exc. GST)
		(Y / N)		(Exc. GST)	, ,
835- Forest Red Gum - Rough-	River-Flat Eucalypt	No	33	\$16,487.13	\$544,075.26
barked Apple grassy woodland on	Forest on Coastal				
alluvial flats of the Cumberland	Floodplains of the New				
Plain, Sydney Basin Bioregion	South Wales North				
	Coast, Sydney Basin and				
	South East Corner				
	Bioregions Endangered				
	Ecological Community				
1232-Swamp Oak floodplain	River-Flat Eucalypt	No	54	\$16,487.13	\$890,304.97
swamp forest, Sydney Basin	Forest on Coastal				
Bioregion and South East Corner	Floodplains of the New				
Bioregion	South Wales North				
	Coast, Sydney Basin and				
	South East Corner				
	Bioregions Endangered				
	Ecological Community				\$1,434,380.23
Total (Exc. GST)					
GST					\$143,438.02
Total (Inc. GST)		-		-	\$1,577,818.25

¹This refers to either; a development application number for a development consent under Part 4 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**), a State significant infrastructure approval under the previous Part 5.1 (now Part 5, Division 5.2) of the EP&A Act, a decision of a determining authority to carry out or approve the carrying out of an activity under Part 5 of the EP&A Act, or a biobank statement number or biodiversity certification number.

² This refers to a controlled action under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* for which a biodiversity offset obligation has been met through payment into the BCF.

Paul Elton

Chief Executive Officer

Date: 14 August 2020

Attachment B. EPBC controlled action completion



prepared for

Goodman Property Services (Aust.) Pty Ltd

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Oakdale West Estate EPBC 2017/7952 Annual Report

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25/02/2021

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Revision Schedule

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1	17/02/2021	Draft for Goodman review/input	Goodman
2	25/02/2021	Final for submission	Goodman

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1. Introduction

1.1 Background

Oakdale West Industrial Estate (Oakdale West) is a regional warehouse and distribution hub, located at Kemps Creek and forms part of the broader Oakdale Industrial Precinct located within the Western Sydney Employment Area (WSEA) (see Figure 1-1).

Goodman Property Services (Aust) Pty Ltd (Goodman) obtained Development Consent SSD 7348 on 13 September 2019 from the Department of Planning, Industry and Environment (DPIE) for the Oakdale West 'Concept Proposal' and 'Stage 1 Development'.

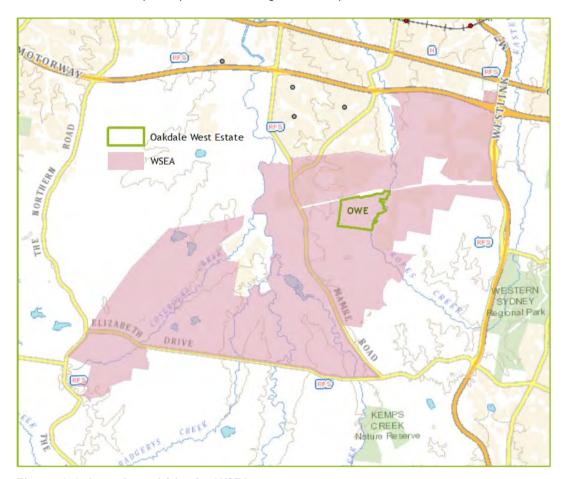


Figure 1-1. Location within the WSEA

The Concept Proposal comprises the Oakdale West Masterplan, which guides development staging and core development controls that form the basis for design and assessment of future site development applications. This includes the management of the site's biodiversity.

Consent for SSD7348 approved the removal of approximately 4.4 hectares (ha) of remnant native vegetation, which included 2.06 ha of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest.

Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (CPW) is a critically endangered community under both the *Environmental Protection and Biodiversity Conservation Act* 1999 (EPBC Act) and *Biodiversity Conservation Act* 2016 (NSW).

1.2 EPBC 2017/7952 consent

Approval to clear no more than 2.06 ha of CPW was initially granted by the Australian Government under section 75 of the EPBC Act on the 31 August 2017 (EPBC 2017/7952).

As a result of the amendments proposed under MOD 1 (refer Section 1.3) consultation was undertaken with the Department of Agriculture, Water and the Environment (the Department) to amend the development footprint. This resulted in an updated notification of approval dated 25 November 2019 with the reference number of EPBC 2017/7952 remaining unchanged. The signed EPBC 2017-7952 Approval Decision Notice is provided in Appendix A.

The updated EPBC 2017/7952 approval is subject to the consent conditions issued by the Department. Table 2-1 provides a summary of these conditions and how they have been complied with.

1.3 SSD Modifications

Development Consent SSD 7348 has been modified on five occasions, as follows:

MOD 1 - approved on 26 March 2020 to modify the concept plan and Stage 1 development, including changes to building pad level of Precinct 2, bio-retention basins and biodiversity offset strategy.

MOD 2 - approved on 21 April 2020 to modify the concept layout and Stage 1, including master plan layout, increase in gross floor area and expansion of Building 1A, changes to internal roads, civil design and building pad levels.

MOD 3 - approved on 3 April 2020 to modify the Concept Proposal including changes to the layout and development staging, reconfiguration of the internal road network and changes to height controls, finished pad levels and changes to retaining walls and noise walls.

MOD 4 - approved on 24 March 2020 for additional works associated with the WNSLR.

MOD 5 - approved on 5th November 2020 to modify the Concept Proposal and Stage 1 DA, including a reduction in building setback to accommodate the widening of the future Southern Link Road (SLR) road reserve, amendments to Precinct 1A layout and car parking spaces, increase in quantities of dangerous goods to be stored in Building 1A, setting up an alternative WNSLR offset site, and extension to required completion date for the noise barriers along the western boundary.

A further modification, MOD 6, is currently under assessment, which is to modify the Concept Proposal and Stage 1 DA, including changes in Precincts 2A, 2C, 2D, 2E layouts, increase in building height control for Precinct 2A, vegetation management plan layout, and inclusion of construction Estate Road 8 as part of Stage 1 development.

2. Consent Compliance

Table 2-1. Compliance summary table

Condition	on	Compliance?	Evidence/Comments
Part A -	Conditions specific to the action		
1.	The approval holder must not clear more than 2.06 hectares (ha) of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest ecological community (CPW), and must not clear any CPW outside the area designated as the 'development site' in the map at Attachment A	Compliant	Shapefiles submitted to Post Approval 9 April 2020 showing extent of clearing undertaken from the designated 'development site' at 1.924 ha. As construction was still in progress at this time, Goodman (the approval holder) indicated that should further clearing of CPW, in addition to the 1.924 ha cleared (but not exceeding the approved 2.06 ha), Goodman (the approval holder) would provide updated shapefiles.
2.	 To compensate for the loss of 2.06 ha of CPW, the approval holder must, within 12 months of the date of this decision, or as otherwise agreed in writing by the Minister: a) Retire 70 like-for-like credits under the NSW FBA and provide offset shapefiles; or b) Retire the equivalent of 70 like-for-like credits under the Biodiversity Conservation Act 2016 (NSW), as converted by DPIE EES in a statement of reasonable equivalence of biodiversity credits, a copy of which must be provided to the Department before like-for-like credits are retired, and provide offset shapefiles; or c) Fund a Biodiversity Conservation Action for CPW under the Biodiversity Conservation Act 2016 (NSW) in accordance with the Biodiversity Conservation Regulation 6.2 (2) (c) (NSW), which has been approved by the DPIE EES. 	Compliant	70 like-for-like credits under the NSW FBA were retired within the required 12month period. Shapefiles of offset areas submitted to Post Approval 17 November 2020 (refer Appendix D EPBC 2017 7952 Part A. Condition 2 Compliance)

Conditio	on	Compliance?	Evidence/Comments
	Note: The variation rules under the Biodiversity Conservation Regulation 6.2 (2) (c) (NSW) must not be applied.		
	Offset obligations for CPW under the EPBC Act must not be discharged through payment into the Biodiversity Conservation Fund (NSW) without prior written approval from the Minister		
			Mod 1 & 4 - submitted 31.03.2020
			Mod 2 - submitted 22.04.2020
			Mod 3 - submitted 20.04.2020
	The approval holder must inform the Department in writing within five (5) business days of any changes to the NSW conditions of consent.	Compliant	Mod 5 - submitted 09.11.2020
			Evidence of these notifications are provided in Appendix E.
3.			It should be noted that notification of Mod 3 was made after five (5) business days. However, with the exception of Mod 1, Mods 2, 3, 4 and 5 have not resulted in any change to consent conditions relating to biodiversity.
			The Department was consulted prior to the issuing of Mod 1 approval, which resulted in the Department's original approval (EPBC 2017 7952 dated 31.07.2017) being amended to the current approval (EPBC 2017 7952 dated 25.11.2019).
4.	Within three (3) months of the commencement of the action, the approval holder must provide shapefiles of the final project area and the precise areas of CPW being cleared.	Compliant	Shapefiles submitted to Post Approval 9 April 2020 showing extent of clearing undertaken from the designated 'development site' at 1.924 ha. Refer Appendix C EPBC 2017 7952 Provision of Shapefiles in.

Conditio	on	Compliance?	Evidence/Comments
Part B -	Standard administrative conditions		
	Notification of date of commencement of the action		Confirmation by the Department regarding
4.	The approval holder must notify the Department in writing of the date of commencement of the action within five (5) business days after the date of commencement of the action	Compliant	notification of commencement is provided in Appendix B.
5.	If the commencement of the action does not occur within five (5) years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	Not applicable	
	Compliance records		
6.	The approval holder must maintain accurate and complete compliance records. If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department with the timeframe specified in the request. Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through general media.	Compliant	Completion records maintained and available on request
7.	Annual compliance reporting The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or as otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:	Compliant	Purpose of this report
	 a) Publish each compliance report on the website with 60 business days following the relevant 12month period; 		

Condition		Compliance?	Evidence/Comments	
	b)	Publish each compliance report on the website with 60 business days following the relevant 12month period;		
	c)	Notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report with five (5) business days of the date of the publication;		
	d)	 Keep all compliance reports publicly available on the website until this approval expires; 		Purpose of this report
7.	e)	 e) Exclude or redact sensitive ecological data from compliance reports published on the website; and 		
	f)	f) Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within five (5) business days of publication.		
	Note: Compliance reports may be published on the Department's website.			
	Reporting non-compliance			
	The approval holder must notify the Department in writing of any: incident or non-compliance with the conditions. The notification must be given within seven (7) days after becoming aware of the incident or non-compliance. The notification must specify:			
8.	a)	Any condition which is or may be in breach;	Not	
	b)	A short description of the incident and/or non-compliance; and	applicable	
	c)	The location (including coordinates), date, and time of the incident and / or non-compliance. In the event the exact information cannot be provided, provide the best information available.		

Condition		Compliance?	Evidence/Comments
	The approval holder must notify the Department the details of any incident or non-compliance with the conditions as soon as practicable and no later than ten (10) business days after becoming aware for the incident or non-compliance, specifying:		
9.	 a) Any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future, 	Not applicable	
	 b) The potential impacts of the incident or non-compliance; and 		
	c) The method and timing of any remedial action that will be undertaken by the approval holder.		
	Independent audit	Noted	
10.	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.		
	For each independent audit, the approval holder must:	Noted	
	 a) Provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; 		
11.	 Only commence the independent audit once the audit criteria have been approved in writing by the Department; 		
	 c) Submit an audit report to the Department within the timeframe specified in the approved audit criteria. 		
12.	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Noted	
13.	Completion of the action	Compliant	Actioned in this report (refer Section 3).

3. Completion of Action

Goodman confirms that as of this date, being the 25th of February 2020:

- a. All construction activities that involved the clearing of CPW from within Oakdale West have been completed, and
- b. All consent conditions as required under the EPBC 2017/7952 approval have been fulfilled.

Goodman does not anticipate any further clearing of would be necessary as a result of future development stages within Oakdale West.

Goodman acknowledges that any further clearing of CPW within Oakdale West would constitute a controlled action under the EBPC Act and a referral to the Department required for the Minister's decision as to whether approval should be granted.

Appendix A. EPBC 2017-7952 Approval Decision Notice



APPROVAL

Oakdale West Estate commercial development, NSW (EPBC 2017/7952)

This decision is made under sections 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)*. Note that section 134(1A) of the **EPBC Act** applies to this approval, which provides in general terms that if the approval holder authorises another person to undertake any part of the action, the approval holder must take all reasonable steps to ensure that the other person is informed of any conditions attached to this approval, and that the other person complies with any such condition.

Details

Person to whom the approval is granted (approval holder)	Goodman Property Services (Aust) Pty Ltd
ABN of approval holder	40 088 981 793
Action	The project seeks to facilitate the development of the Oakdale West precinct, 6 kilometres (km) east of Horsley Park in western Sydney, into a regional warehousing and distribution hub. Oakdale West represents the third stage of development within the broader Oakdale estate [See EPBC Act referral 2017/7952].

Approval decision

My decisions on whether or not to approve the taking of the action for the purposes of each controlling provision for the action are as follows.

Controlling Provisions

Listed Threatened Species and Com	munities	
Section 18	Approve	
Section 18A	Approve	

Period for which the approval has effect

This approval has effect until 31 December 2039

Decision-maker

Name and position	Louise Vickery
	Assistant Secretary
	Environment Approvals and Wildlife Trade Branch
	Department of the Environment and Energy
Signature	Loeuse Nickous
Date of decision	25/11/2019.

Conditions of approval

This approval is subject to the conditions under the EPBC Act as set out in ANNEXURE A.

ANNEXURE A - CONDITIONS OF APPROVAL

Part A - Conditions specific to the action

- 1. The approval holder must not **clear** more than 2.06 hectares (ha) of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest ecological community **(CPW)**, and must not **clear** any **CPW** outside the area designated as the 'development site' in the map at <u>Attachment A</u>.
- 2. To compensate for the loss of 2.06 ha of **CPW**, the approval holder must, within 12 months of the date of this decision, or as otherwise agreed in writing by the **Minister**:
 - a. Retire 70 like-for-like credits under the NSW FBA and provide offset shapefiles; or
 - b. Retire the equivalent of 70 like-for-like credits under the Biodiversity Conservation Act 2016 (NSW), as converted by DPIE EES in a statement of assessment of reasonable equivalence of biodiversity credits, a copy of which must be provided to the Department before like-for-like credits are retired, and provide offset shapefiles; or
 - c. Fund a Biodiversity Conservation Action for **CPW** under the *Biodiversity Conservation Act* 2016 (NSW) in accordance with the Biodiversity Conservation Regulation 6.2 (2) (c) (NSW), which has been approved by **DPIE EES**.

Note: The variation rules under the *Biodiversity Conservation Regulations 2017* (section 6.4) (NSW) must not be applied.

Offset obligations for **CPW** under the EPBC Act must not be discharged through payment into the Biodiversity Conservation Fund (NSW) without prior written approval from the **Minister**.

- 3. The approval holder must inform the **Department** in writing within five (5) business days of any changes to the **NSW conditions of consent.**
- 4. Within three (3) months of the **commencement of the action**, the approval holder must provide **shapefiles** of the final project area and the precise areas of **CPW** being **cleared**.

Part B - Standard administrative conditions

Notification of date of commencement of the action

- 4. The approval holder must notify the **Department** in writing of the date of **commencement of the action** within five (5) **business days** after the date of **commencement of the action**.
- 5. If the **commencement of the action** does not occur within five (5) years from the date of this approval, then the approval holder must not **commence the action** without the prior written agreement of the **Minister**.

Compliance records

6. The approval holder must maintain accurate and complete compliance records. If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.

Note: **Compliance records** may be subject to audit by the **Department** or an independent auditor in accordance with section 458 of the **EPBC Act**, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the **Department**'s website or through the general media.

Annual compliance reporting

- 7. The approval holder must prepare a **compliance report** for each 12 month period following the date of **commencement of the action**, or otherwise in accordance with an annual date that has been agreed to in writing by the **Minister**. The approval holder must:
 - a. publish each **compliance report** on the **website** within 60 **business days** following the relevant 12 month period;
 - notify the **Department** by email that a **compliance report** has been published on the **website**and provide the weblink for the **compliance report** within five (5) **business days** of the date of
 publication;
 - c. keep all compliance reports publicly available on the website until this approval expires;
 - d. exclude or redact **sensitive ecological data** from **compliance reports** published on the **website**; and
 - e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within five (5) business days of publication.

Note: Compliance reports may be published on the Department's website.

Reporting non-compliance

- 8. The approval holder must notify the **Department** in writing of any: **incident or** non-compliance with the conditions. The notification must be given within seven (7) days after becoming aware of the **incident** or non-compliance. The notification must specify:
 - a. any condition which is or may be in breach;
 - b. a short description of the incident and/or non-compliance; and
 - c. the location (including co-ordinates), date, and time of the **incident** and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.
- 9. The approval holder must provide to the **Department** the details of any **incident** or non-compliance with the conditions as soon as practicable and no later than ten (10) **business days** after becoming aware of the **incident** or non-compliance, specifying:
 - a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;
 - b. the potential impacts of the incident or non-compliance; and
 - c. the method and timing of any remedial action that will be undertaken by the approval holder.

Independent audit

- 10. The approval holder must ensure that **independent audits** of compliance with the conditions are conducted as requested in writing by the **Minister**.
- 11. For each independent audit, the approval holder must:
 - a. provide the name and qualifications of the independent auditor and the draft audit criteria to the **Department**;
 - b. only commence the **independent audit** once the audit criteria have been approved in writing by the **Department**; and
 - c. submit an audit report to the **Department** within the timeframe specified in the approved
- 12. The approval holder must publish the audit report on the **website** within 10 **business days** of receiving the **Department's** approval of the audit report and keep the audit report published on the **website** until the end date of this approval.

Completion of the action

13. Within 30 days after the **completion of the action**, the approval holder must notify the **Department** in writing and provide **completion data**.

Part C - Definitions

In these conditions, except where contrary intention is expressed, the following definitions are used:

Business day(s) means a day that is not a Saturday, a Sunday or a public holiday in the state or territory of the action.

Clear / Clearing means the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning of vegetation (but not including weeds – see the *Australian weeds strategy 2017 to 2027* for further guidance).

Commencement of the action (also **commence the action**) means the first instance of any specified activity associated with the action including **clearing** and **construction**. **Commencement of the action** does not include minor physical disturbance necessary to:

- i. undertake pre-clearance surveys or monitoring programs;
- ii. install signage and /or temporary fencing to prevent unapproved use of the project area;
- iii. protect environmental and property assets from fire, weeds and pests, including use of existing surface access tracks;
- iv. install temporary site facilities for persons undertaking pre-commencement activities so long as these are located where they have no impact on the **protected matters**.

Completion data means an environmental report and spatial data clearly detailing how the conditions of this approval have been met. The **Department**'s preferred spatial data format is **shapefile**.

Completion of the action means the time at which all approval conditions (except condition 13) have been fully met.

Compliance records means all documentation or other material in whatever form required to demonstrate compliance with the conditions of approval in the approval holder's possession or that are within the approval holder's power to obtain lawfully.

Compliance reports means written reports:

- i. providing accurate and complete details of compliance, **incidents**, and non-compliance with the conditions:
- ii. consistent with the **Department's** Annual Compliance Report Guidelines (2014);
- iii. which include a **shapefile** of any **clearance** of any **protected matters**, or their habitat, undertaken within the relevant 12 month period.

Construction means the undertaking of any preparatory works, earthworks, erection of any infrastructure, the formation of any hardstand surfaces, or the first instance of any use of heavy duty equipment for earthworks, the laying of pipes and other prefabricated materials in the ground, and any associated excavation work; but excluding the erection of temporary fences and signage.

CPW means Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest ecological community, listed as critically endangered under the **EPBC Act** on 9 December 2009, defined in the *Approved Conservation Advice for Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest ecological community* (Department of the Environment. Water, Heritage and the Arts, 2009). and the equivalent plant community types (PCTs), which are:

- i. PCT 724 Broad-leaved Ironbark Grey Box Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion.
- ii. PCT 849 Grey Box Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion.
- iii. PCT 850 Grey Box Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion.

DPIE EES means the Department of Planning, Infrastructure and Environment's Environment, Energy and Science group, formerly known as the Office of Environment and Heritage.

Department means the Australian Government department responsible for the administration of the **EPBC Act**.

EPBC Act means the Environment Protection and Biodiversity Conservation Act 1999 (Cth).

Incident means any event which has the potential to, or does, impact on **protected matters**.

Independent means a person that does not have an individual or by employment or family affiliation, any conflicting or competing interest with the approval holder, the approval holder's staff, representatives or associated persons; or the project, including any personal, financial, business or employment relationship, other than receiving payment for undertaking the role for which the condition requires an independent person.

Independent audit: means an audit conducted by an **independent** and **suitably qualified person** as detailed in the *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines* (2019).

Like-for-like credits has the meaning given under the *Biodiversity Conservation Act 2016* (NSW) (BC Act).

Minister means the Australian Government minister responsible for administering the **EPBC Act**, and includes a delegate of the **Minister**.

NSW FBA means the New South Wales Framework for Biodiversity Assessment published by the Office of Environment and Heritage (2018).

NSW conditions of consent means the document recording the final approval for the Oakdale West Estate commercial development by the delegate of the NSW Minister for Planning and Public Spaces, dated 13 September 2019 and titled 'Development Consent, Section 4.38 of the *Environmental Planning and Assessment Act 1979'*.

Protected matter means a matter protected under a controlling provision in Part 3 of the **EPBC Act** for which this approval has effect.

Retire / retired / retiring means to change the status of a credit such that the credit can no longer be bought or sold.

Sensitive ecological data means data as defined in the Australian Government Department of the Environment (2016) *Sensitive Ecological Data – Access and Management Policy V1.0.*

Shapefile means location and attribute information of the action provided in an Esri shapefile format. Shapefiles must contain '.shp', '.shx', '.dbf' files and a '.prj' file that specifies the projection/geographic coordinate system used. **Shapefiles** must also include an '.xml' metadata file that describes the shapefile for discovery and identification purposes.

Website means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

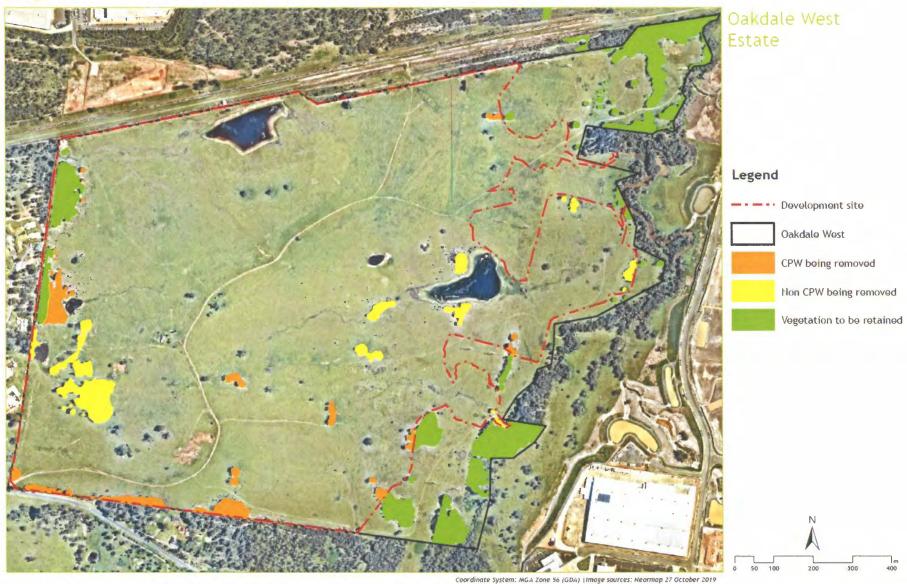
ATTACHMENTS

Attachment A Map of construction footprint where proposed action will take place

Attachment A

Extent of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest to be removed within the construction footprint, labelled in this figure as the development site.

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Appendix B. EPBC 2017 7952 Confirmation of Commencement

EPBC reference: 2017/7952

Email: epbcmonitoring@environment.gov.au

Kym Dracopoulos Manager, Technical Services Goodman Property Services (Aust) Pty Limited GPO Box 4703 Sydney NSW 2001

Dear Ms Dracopoulos

Commencement of the Action – Oakdale West Estate commercial development, NSW (EPBC 2017/7952)

I refer to your email of 21 January 2020 notifying the Department of the Environment and Energy (the Department) of commencement of the action of Oakdale West Estate commercial development, NSW in accordance with condition 4 of the *Environment Protection and Biodiversity Conservation Act 1999* (the Act) approval (EPBC 2015/7513).

I note that the project commenced on 14 January 2020.

Condition 2

Condition 2 of the approval requires that the approval holder must within 12 months of the date of the decision:

- a. Retire 70 like-for-like credits under NSW FBA and provide offset shapefiles; or
- b. Retire the equivalent of 70 like-for-like credits under the *Biodiversity Conservation Act 2016* (NSW), as converted by DPIE EES, and provide offset shapefiles; or
- c. Fund a Biodiversity Conservation Action for CPW under the *Biodiversity*Conservation Act 2016 (NSW) in accordance with the Biodiversity Conservation

 Regulation 6.2(2)(c) (NSW) approved by DPIE EES.

The requirements under condition 2 are due by 25 November 2020.

Condition 4

Condition 4 of the approval requires that within 3 months of the commencement of action the approval holder must provide to the Department, shapefiles of the final project area and the precise areas of CPW being cleared.

Condition 7

Condition 7 of the approval requires that the approval holder must prepare Annual Compliance Reports for each 12 month period following the date of commencement of the action, and must continue to publish and submit to the Department until the expiry of the approval on 31 December 2039. The reports must be published and submitted to the Department within 60 business days of every 12 month anniversary of commencement.

Please submit the report by email including a link to where it is publically available to epbcmonitoring@environment.gov.au. The first report is due by 13 April 2021.

When preparing the report please refer to the Department's Annual Compliance Report Guidelines available on the Department's website at http://www.environment.gov.au/epbc/publications/annual-compliance-report-guidelines

Please note that conditions of the approval require the approval holder to maintain accurate records of all activities associated with, or relevant to, the approval conditions so that they can be made available to the Department on request. These documents may be subject to audit and be used to verify compliance. Summaries of audits may be published by the Department.

Section 142 of the Act requires an approval holder to comply with conditions attached to an approval. Penalties may apply to approval holders who contravene conditions.

More information about the Department's Monitoring and Audit program is available on the Department's website at http://www.environment.gov.au/epbc/compliance-and-enforcement/auditing.

If you would like to discuss this matter further, please contact Kranti Kulkarni at epbcmonitoring@environment.gov.au

Yours sincerely

Ms Toni Hart Assistant Director

Environment Audit

January 2020



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ABN: 12 043 047 145 12 Wanganella Street Balgowlah NSW 2093 Tel 0437 821 110

Department of Agriculture, Water and the Environment GPO Box 787 Canberra ACT 2601

Attn:

Compliance and Enforcement Branch Environment Assessment and Compliance Division Audit and Assurance Section

CC: Kym Dracopoulos (Goodman)

9 April 2020

EPBC Ref. 2017/7952 - Condition 4: provision of shapefiles

On behalf of Goodman Property Services (Aust) Pty Ltd (Goodman) please find attached relevant shapefiles (as required under Condition 4 of your department's approval for EPBC 2017/7952).

Condition 4 of the approval requires that within 3 months of the commencement of action the approval holder must provide to the Department, shapefiles of the final project area and the precise areas of CPW being cleared.

As required relevant shapefiles provided include the following:

Shapefile name	Description
Development_footprint	Extent of internal Oakdale West development footprint
20200408 OWE PCT849-850# clearing	Extent of CPW cleared as at 09/04/2020

^{*} NSW plant community type (PCT) commensurate with EPBC Act listed CPW are provided below along with area in hectares (ha) that have been cleared as at 09/04/2020:

NSW PCT Code / Common Name				
PCT 849	Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	1.121		
PCT 850	Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion			
TOTAL CPW removed				

The shapefiles provided evidence of compliance with Part A - Conditions specific to the action, specifically condition 1 as at 09/04/2020:

1. The approval holder must not clear more than 2.06 hectares (ha) of Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest ecological community (CPW), and must not clear any CPW outside the area designated as the 'development site' in the map at Attachment A.

Figure 1. Vegetation cleared (enclosed) illustrates the extent of the development footprint and CPW cleared.

As construction is ongoing, should further clearing of CPW (i.e. in addition to the current 1.924 ha cleared, but not exceeding the approved 2.06 ha), Goodman (the approval holder) will provide updated shapefiles to your department.

Should you have any queries related to the information provided please contact the undersigned. All other correspondence should continue to be directed to Goodman's contact Mr Kym Dracopoulos.

Yours faithfully

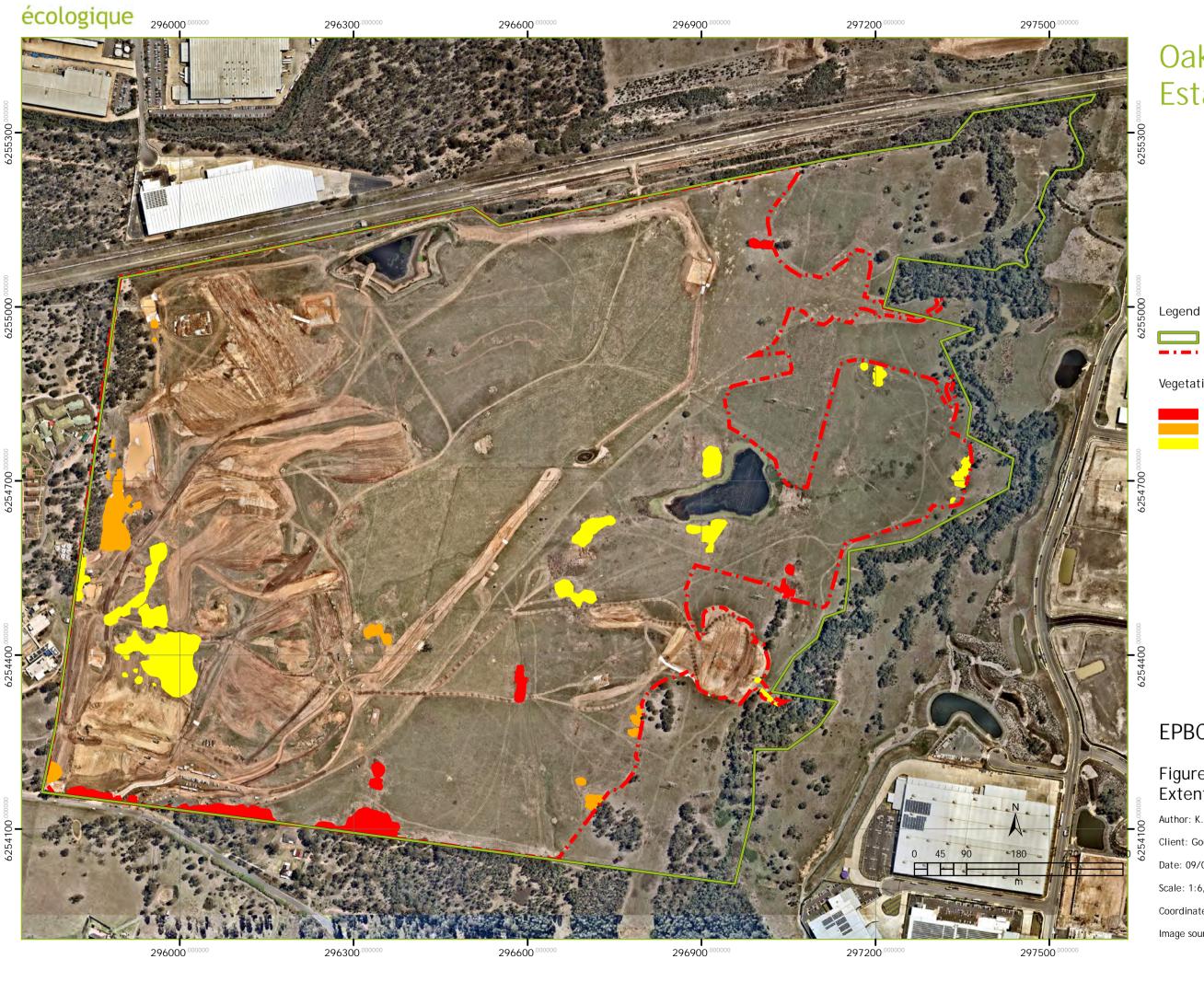
Kat Duchatel

BSc. Env. CEnvP EIANZ #691

Tel: 0437 821 110 | Em: kat@ecologique.com.au

Encl.

Figure 1. Vegetation cleared



Oakdale West Estate

OWE boundary Development site

Vegetation cleared

CPW on flats (PCT 850) CPW on shale (PCT 849) Non CPW being removed

EPBC Ref. 2017/7952

Figure 1. Extent of vegetation cleared

Author: K.Duchatel

Client: Goodman Property Services (Aust.) Pty Ltd

Date: 09/04/2020

Scale: 1:6,000 @ A3

Coordinate System: MGA Zone 56 (GDA 94) Image sources: Nearmap 22 January 2020



écologique

ABN: 12 043 047 145 12 Wanganella Street Balgowlah NSW 2093 Tel 0437 821 110

Department of Agriculture, Water and the Environment GPO Box 787 Canberra ACT 2601

Attn:

Compliance and Enforcement Branch Environment Assessment and Compliance Division Audit and Assurance Section

CC: Kym Dracopoulos (Goodman)

17 November 2020

EPBC Ref. 2017/7952 - Condition 2: provision of shapefiles

Under Condition 2 of the approval for EPBC 2017/7952, Goodman Property Services (Aust) Pty Ltd (Goodman) is required to compensate for the loss of 2.06 ha of Cumberland Plain Woodland (CPW), within 12 months of the date of the approval (25/11/2019), through the following means:

- a. Retire 70 like-for-like credits under the NSW FBA and provide offset shapefiles; or
- b. Retire the equivalent of 70 like-for-like credits under the Biodiversity Conservation Act 2016 (NSW), as converted by DPIE EES in a statement of reasonable equivalence of biodiversity credits, a copy of which must be provided to the Department before the like-for-like credits are retired, and provide offset shapefiles; or
- c. Fund a Biodiversity Conservation Action for **CPW** under the Biodiversity Conservation Act 2016 (NSW) in accordance with the Biodiversity Conservation Regulation 6.2 (2) (c) (NSW), which has been approved by **DPIE EES**.

Goodman has retired 70 like-for-like credits to fulfil part (a) of this condition, from the following NSW plant community types (PCTs):

- PCT 849 Grey Box Forest Red Gum grassy woodland on flats of the Cumberland Plain,
 Sydney Basin Bioregion (40 credits)
- PCT 850 Grey Box Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion (30 credits)

Note: A statement of reasonable equivalence (from biobanking credits to biodiversity credits) was provided by the DPIE EES with no change in the number of credits required for the relevant CPW PCTs.

On behalf of Goodman Property Services (Aust) Pty Ltd (Goodman), écologique has repeatedly requested assistance in obtaining the shapefiles from the DPIE EES. These are yet to be provided.

In order to comply with the 12 month time frame in which Condition 2 must be met, shapefiles have been created to show the boundaries of either:

- Biobanking offset sites based on information provided publicly on the NSW Biobanking Agreement Register biobanking offset site, or
- The allotment that the biobanking offset site is known to be located, based on the agreement for the sale and purchase between Goodman and the Vendor.

The following shapefiles are provided and shown in Figures 1, 2 and 3:

Shapefile name	Description	Credits retired	Equivalent NSW PCT
BA283_boundaries.shp	Digitised boundaries of biobanking offset sites under agreement no. 283	22	PCT 849 Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion (HN528)
BA413_boundaries.shp	Digitised boundaries of biobanking offset sites under agreement no. 413	18	PCT 849 Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion (HN528)
BA447_boundaries.shp	Digitised boundaries of allotment containing biobanking offset sites under agreement no. 447	30	PCT 850 Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion (HN529)

Should you have any queries related to the information provided please contact the undersigned. All other correspondence should continue to be directed to Goodman's contact Mr Kym Dracopoulos.

Yours faithfully

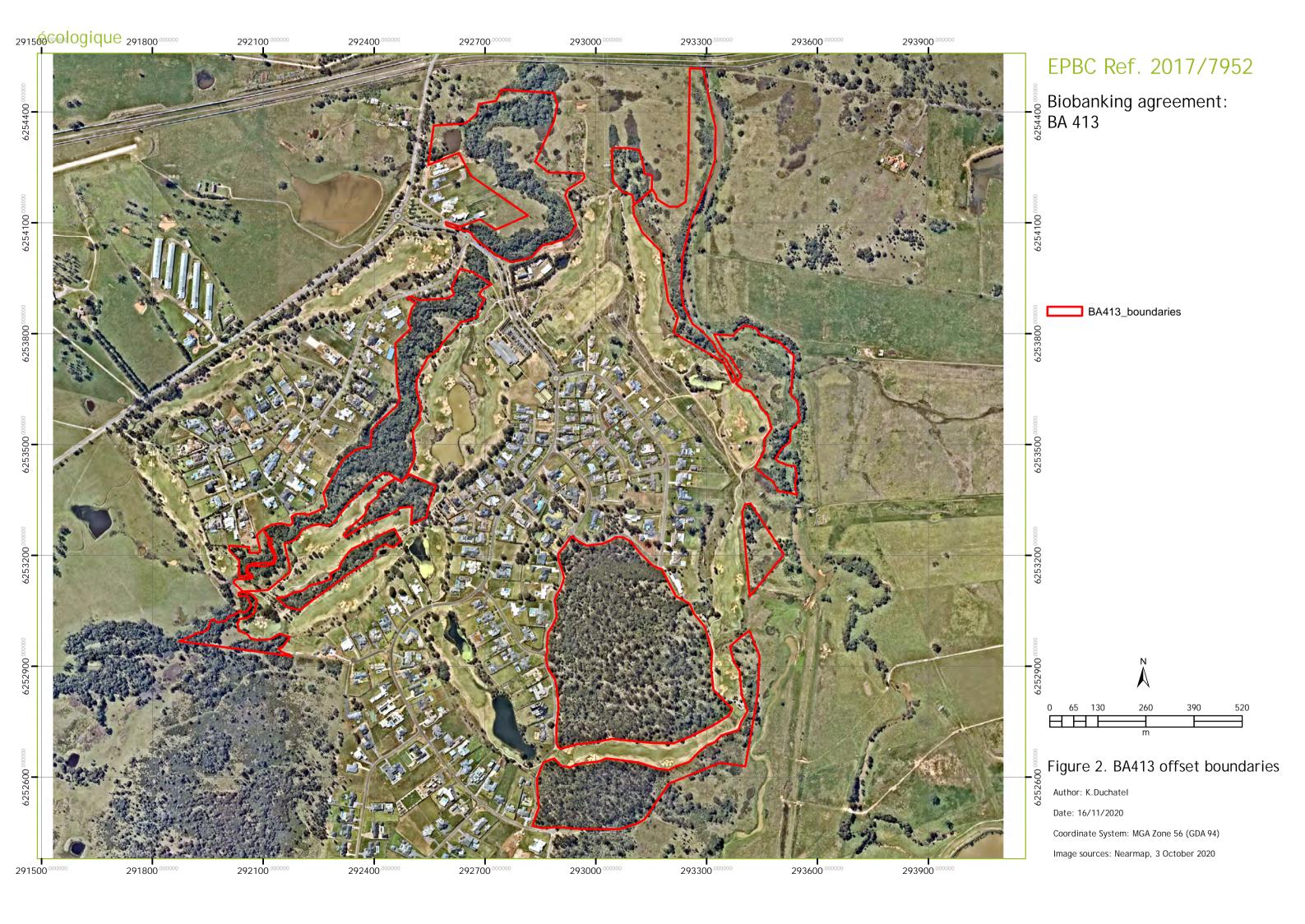
Kat Duchatel

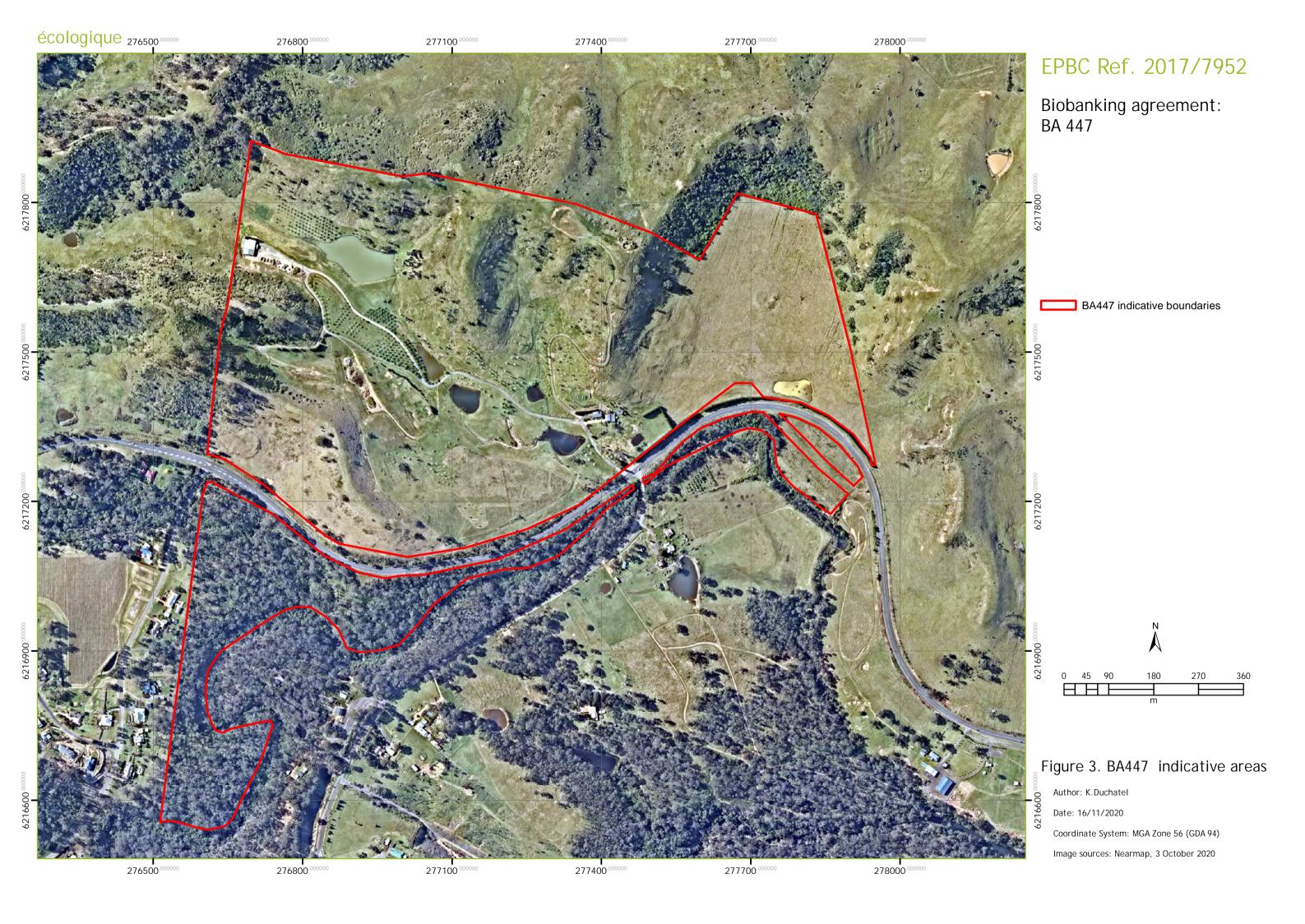
BSc. Env. | BAM Accreditation No. BAAS17054



Encl. Figures 1, 2 and 3, and Biobanking credit retirement summary report









Credit retirement report

Effective date: 11-August-2020

Transaction number: 202008-RT-558

Credit owners' details

Credit owner ID: 690

Name of credit holder: BGMG 11 Pty Limited as trustee for BGMG 1 Oakdale West Trust

Other owner(s):

No other owners

Reason for retirement: to meet part of the biodiversity credit development obligation for SSD 7348.



Ecosystem credit(s) retired									
Number of credits	Credit profile ID	Agreement ID	Vegetation code	Vegetation type	CMA subregion	% surrounding vegetation	Patch size	Vegetation formation(see key)	
18	3,287	413	HN528	HN528/Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	Cumberland - Hawkesbury/Nep ean	11-30%	<5 ha	GRW	
22	2,596	283	HN528	HN528/Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	Cumberland - Hawkesbury/Nep ean	>70%	<5 ha	GRW	
28	3,509	447	HN529	HN529/Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion	Cumberland - Hawkesbury/Nep ean	31-70%	<5 ha	GRW	
2	3,514	447	HN529	HN529/Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion	Cumberland - Hawkesbury/Nep ean	31-70%	<5 ha	GRW	

