

2 November 2020

Department of Planning, Industry and Environment
Green and Resilient Places Division
Locked Bag 5022
Parramatta NSW 2124
biodiversity@planning.nsw.gov.au

Dear Sir/Madam,

Lots [REDACTED] – Kemps Creek

We are writing this submission on behalf of Clifton Avenue Holdings the owner of Lots [REDACTED]. The [REDACTED] Lots is shown in **Figure 1** below. Clifton Avenue is currently evaluating the land with a view to facilitating employment related development in line with the objectives of the Aerotropolis Plan once the Kemps Creek Precinct is zoned under *State Environmental Planning Policy (Western Sydney Aerotropolis) 2020*.

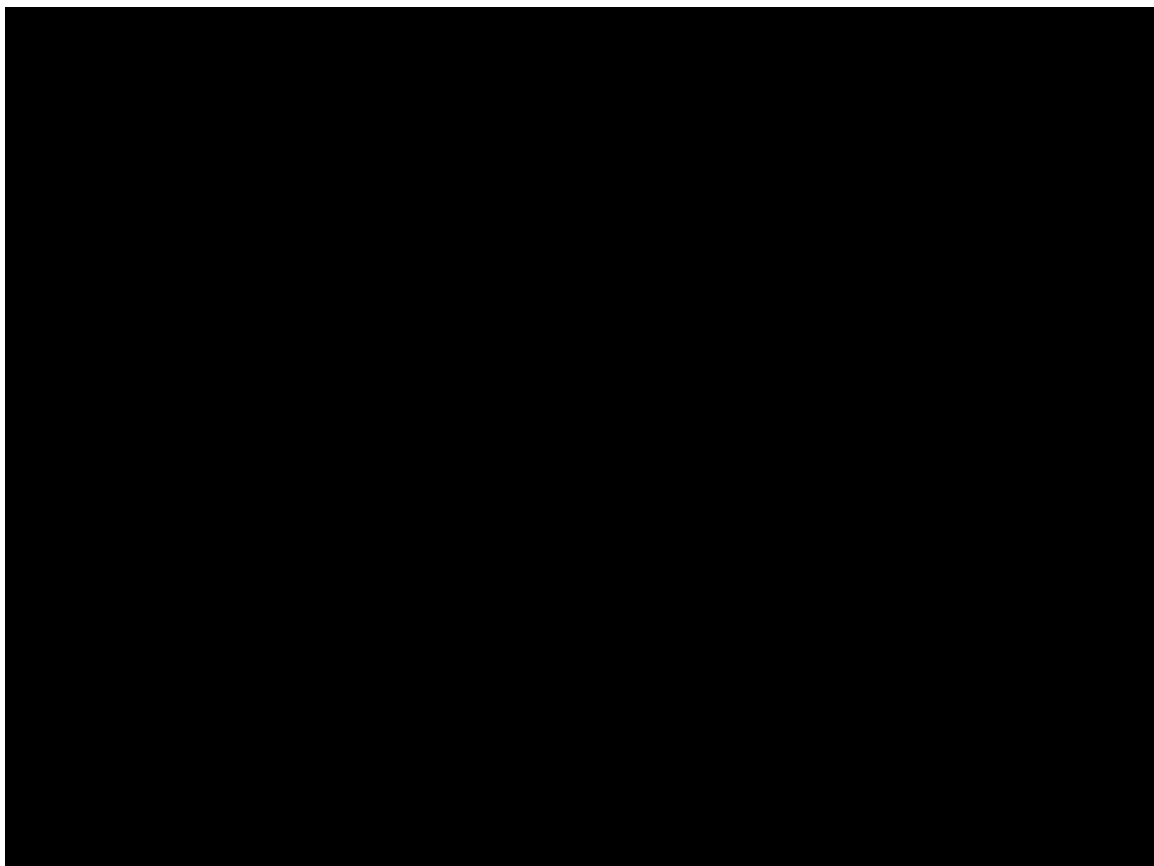


Figure 1 Site Aerial
Source: Sixmaps

Clifton Avenue objects to the designation of a significant area of Lot [REDACTED] as a Strategic Conservation Area (SCA) under the draft Cumberland Plain Conservation Plan (CPCP). This objection is based on the limited vegetation present on the lot and its general poor condition. In the absence of a detailed survey of the vegetation on the lot, Clifton Avenue contends that the Department is not in a position to finalise the draft CPCP without the benefit of a detailed on the ground survey of the existing vegetation communities on the site and their condition.

There is a balance that is required to ensure that, while the conservation objectives of the Aerotropolis are achieved, this should be weighed against the achievement of sufficient, serviceable land close to the Western Sydney Airport for employment purposes.

An Ecologist has been briefed on the site and is about to commence vegetation surveys to establish an informed basis for ecological assessment. This work is expected to be completed over the next month.

Notwithstanding the above, Clifton Avenue acknowledges that there is likely to be conservation value in the vegetation along the south east boundary of Lot 2 where it adjoins the adjoining property [REDACTED]. Regeneration of this area would connect established vegetation to the east of the site through to the South Creek Corridor and form part of a longer corridor connecting South Creek with Kemps Creek to the east. Preliminary advice from the ecologist indicates that a 75m corridor in this location would be sufficient to perform this function.

In addition, Clifton Avenue is willing to designate additional land along the South Creek Corridor in Lot [REDACTED] for conservation purposes. This land would enhance conservation outcomes in the Wianamatta-South Creek Precinct / Corridor. The areas proposed as an alternative conservation outcome are shown coloured red in **Figure 2** below.

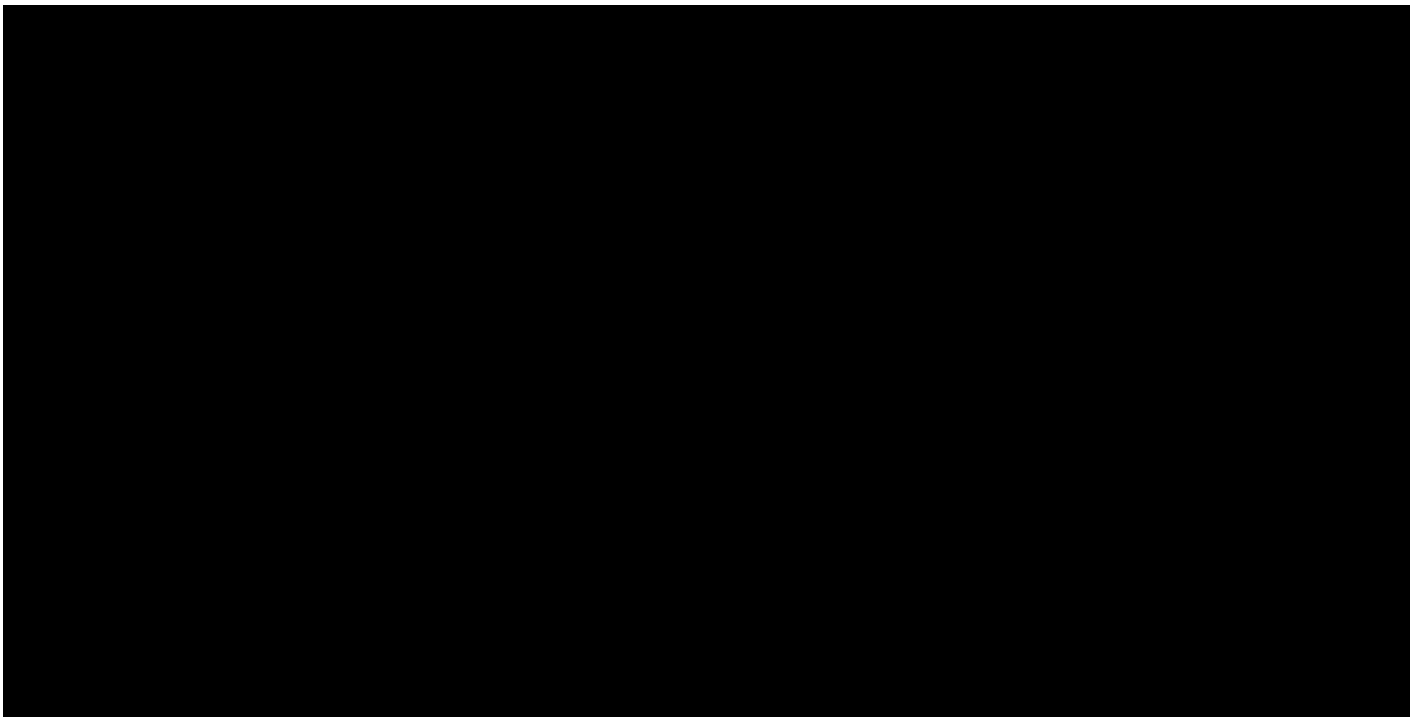


Figure 2 Proposed Conservation Outcomes

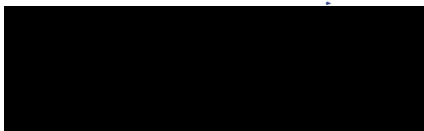
Source: DPIE / Clifton Avenue Holdings

ETHOS URBAN

The final CPCP should include flexibility to enable conservation outcomes to be delivered through detailed investigation as part of future master planning of development sites and the evidence based specialist technical studies prepared as part of those processes.

Clifton Avenue would be happy to meet with the Department to further discuss the findings of the detailed surveys when they have been undertaken with a view to an informed

Yours sincerely,



Director, Planning