ACS Environmental Pty Ltd

BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT (BDAR)

FOR

PROPOSED TRANSIT-ORIENTATED DEVELOPMENT AT 19 - 25 BALFOUR STREET, LINDFIELD, NSW, 2107

PREPARED FOR:

Balfour Group Pty Ltd

2nd June 2025 (Revised April 2026)

ACS Environmental Pty Ltd

Flora and Fauna Surveys, Biodiversity and Ecological Impact Assessment and Bushland Plans of Management Services

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DOCUMENT CONTROL

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1	07/05/2025	P STRICKER & J DREVON	First Draft
3	02/06/2025	P STRICKER & J DREVON	Minor fixes
4	25/03/2026	J DREVON	Changes to plans, arborist report
5	1/04/2026	J DREVON	Minor fixes, response to Council

DECLARATIONS

i. Certification under clause 6.15 Biodiversity Conservation Act 2016

I certify that this report has been prepared based on the requirements of, and information provided under, the Biodiversity Assessment Method and clause 6.15 of the *Biodiversity Conservation Act 2016* (BC Act).

Signature: _____

Date: 01/04/2026

BAM Assessor Accreditation no: BAAS24033

ii. Details and experience of author/s and contributors

Name	Qualifications/training	Role
Peter Stricker Director ACS Environmental Principal Ecologist	BSc. (Hons) (USyd) Member Ecological Consultants Association NSW Inc ACS Environmental is an accredited Animal Research Establishment certified by the NSW Dept of Primary industries Over 20 years' experience in scientific research (ecological), biodiversity impact assessment and teaching in biological sciences.	Field assessment, project management, document draft
Josie Drevon Consultant Ecologist	BSc., Grad. Dip. (UNSW) Member Ecological Consultants Association NSW Inc Scientific Biodiversity Conservation Act Licence (SL102855) BAM Accredited Assessor (#BAAS24033) Over 10 years' experience in ecological field work, ecological impact assessment and teaching in biological sciences.	Field assessment, BAM calculations, BDAR preparation

EXECUTIVE SUMMARY

This Biodiversity Development Assessment Report (BDAR) has been prepared by ACS Environmental Pty Ltd on behalf of *Balfour Group Pty Ltd* to accompany a State Significant Development Application (SSDA) for a proposed residential flat building (including in-fill affordable housing) at 19 – 25 Balfour Street, Lindfield, within the Ku-ring-gai Local Government Area (LGA).

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-82709458) on 22 April 2025 and revised in March 2026.

This report concludes that the proposed residential flat building is suitable and warrants approval subject to the implementation of the following mitigation measures:

- The works are wholly contained within the property boundaries of the subject site including laydown of materials and equipment in a staged development
- Bats must be surveyed in roof cavities and under eaves etc to determine which species are present in buildings before demolition, during demolition, roofs must be dismantled in evenings when bats are likely foraging and not roosting in roof cavities
- Landscaping should include up to 80% of native tree, shrub, forb and grass species that are representative of PCT 3262, Sydney Turpentine Ironbark Forest, to enhance the native vegetation component of the locality, which in turn would increase potential roosting and foraging habitat for native fauna occurring in the locality

Following the implementation of the above mitigation measures, the remaining impacts are considered appropriate.

SHORTENED FORMS

APZ	Asset Protection Zone
BAM	Biodiversity Assessment Method
BC Act	Biodiversity Conservation Act (2016): legislation enacted in August 2017
BOS	Biodiversity Offsets Scheme
BV Map	Biodiversity Values Map
CEEC	Critically Endangered Ecological Community
DCCEEW	The Department of Climate Change, Energy, the Environment and Water
DEC	State Department of Environment and Conservation
DPE	Department of Planning and Environment
DPI	Department of Primary Industries
E (threatened species status)	Endangered species
EEC	Endangered Ecological Community as listed by the BC Act and EPBC Act
EMA	Effluent Management Area
EPA Act	Environment Protection Act
EPBC Act	Environmental Protection & Biodiversity Conservation Act (1999). Enacted to protect and manage nationally and internationally (migratory) flora, fauna and ecological communities, defined in the Act as matters of national environmental significance (NES)
HTW	High Threat Weeds
IPA	Inner Protection Zone
KTP	Key Threatening Process: a process that threatens the survival, life cycle, abundance or potential evolutionary development of a native species, population or ecological community. KTPs are listed under the BC Act and the EPBC Act.
Migratory Species	Listed under the EPBC Act and relating to international agreements to which Australia is a signatory. Includes the Japan-Australia Migratory Bird Agreement (JAMBA), Chine-Australia Migratory Bird Agreement (CAMBA) Republic of Korea Migratory Bird Agreement (ROKAMBA)
OEH	State Office of Environment and Heritage
OPA	Outer Protection Zone
NPWS	State National Parks and Wildlife Service
PCT	Plant Community Type identified as such using the Bionet Vegetation Classification system (OEH 2018)

RoTAP	Rare or Threatened Australian Plants
SRZ	Structural Root Zone
STIF	Sydney Turpentine Ironbark Forest
TBDC	Threatened Biodiversity Data Collection
Threatened species, populations or ecological communities	Entities listed by the BC Act and EPBC Act as 'Vulnerable to decreasing population growth in time', Endangered as population growth decreasing rapidly leading to eventual extinction' or 'Critically Endangered, a more extreme rate of population decrease than the former'
TPZ	Tree Protection Zone
V (threatened species status)	Vulnerable

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1 INTRODUCTION

1.1 Proposed development

In April 2025, ACS Environmental Pty Ltd was commissioned by The Balfour Group Pty Ltd to survey for flora and fauna and undertake a biodiversity impact assessment (BDAR) for an SSDA for a proposed Transit-orientated infill housing development (ToD) to occur at 19 - 25 Balfour Street, Lindfield.

Relevant Item	Detailed descriptions
Administration	• Proponent Name: Balfour Group Pty Ltd Contact details: +61 403 695 563 Applicant: Balfour Group Pty Ltd Local Contact: Aries Xu Contact details: +61 403 695 563 • Project ID: Application No. SSD-82709458 • Names and qualifications of persons completing this report. **Person 1** - Mr Peter Stricker (BSc Hons Syd Uni); 35 years ecological impact assessment experience (Director and Principal Ecologist ACS Environmental P/L); Practising Member Ecological Consultants Association NSW Inc; ACS Environmental is an accredited Animal Research Establishment certified by the NSW Dept of Primary industries **Person 2** - Ms Josie Drevon (Grad. Dip. (UNSW)) #^ Member Ecological Consultants Association NSW Inc # Accredited Biodiversity Assessment Assessor (Biodiversity Conservation Act 2016) – (Accreditation Number BAAS24033) ^ Scientific Biodiversity Conservation Act Licence (SL102855)
Site Details	• Street Address: 19 - 25 Balfour Street, Lindfield, NSW, 2071 LGA: Ku-ring-gai Council LGA. Description of existing site - all the combined allotments will be cleared for the proposed development, a total land area of 4,771m^2 or 0.477ha

SSDA for residential apartment building including affordable housing

Specifically, the SSDA seeks development consent for a proposed residential flat building, including in-fill affordable housing at 19 – 25 Balfour Street, Lindfield. The proposed works include demolition of existing structures, site preparation works, excavation and construction of the building and associated landscaping works.

The SSDA seeks development consent for:

- demolition of existing buildings and structures on site
- construction of a 10-storey residential flat building featuring:
    - basement level car parking
    - 30 affordable housing units
    - 90 market residential units
- associated landscaping works, including a communal open space
- associated infrastructure and services.

The proposal incorporates 17% affordable housing pursuant to Chapter 2, Section 15C and Chapter 5, Section 156 of the Housing SEPP. The proposal seeks to utilise the incentive controls under Chapter 2, Part 2, Division 1, Section 16 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) to achieve 30% additional building height and floor space ratio (FSR).

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) dated 22 April 2025 (SSD-82709458). This report has been prepared to respond to the SEARs requirement issued below.

Issue and Assessment requirements (SEARS)

Issue 16. Biodiversity

• Unless a waiver has been granted, provide a Biodiversity Development Assessment Report (BDAR) that assesses any biodiversity impacts associated with the development in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020

Property details

19-25 Balfour St is located in a long-established urban setting on a quiet street in Lindfield, on the northern suburbs of Sydney.

The 4 properties at 19 - 25 Balfour Street, Lindfield, have a total land area of 4,771m^2 or 0.477ha.

The property details are as follows:

Street number	**19**	**21**	**23**	**25**
Lot Number	12	1	13	13
DP Number	654363	121527	657173	663524

1.2 Existing Vegetation

The canopy of the mostly exotic and non-locally occurring native vegetation occurring on the subject land is comprised largely of semi-mature to mature trees to about 12m in height of species including Jacaranda, Magnolia, Northern Bangalow Palm, Chinese Hackberry, Orange Jessamine, Wild Banana etc (Scales 2025).

Common smaller exotic tree, shrub and ground cover species occurring in the general understorey canopy include Agapanthus, Camellia, Begonia, Abelia, Jasmine, Creeping Fig, Dietes, Philodendron, Kentia Palm, Hydrangea, Clivia etc.

The vegetation mapping indicates that PCT 3262 'Sydney Turpentine Ironbark Forest' (DCCEEW 2025) was the most likely ecological plant community that occurred at the subject site before mature native trees such as Blue Gum and Turpentine had died (Naturally Trees 2025). The TPZ's of neighbouring trees, including Sydney Blue Gum and Sydney Red Gum, which are a component of PCT 3262 that occur in Nos. 17 Balfour Street, Lindfield, and in Nos. 10 and 14 Highfield Road, Lindfield, do not encroach into the development footprint, such that impacts to living trees comprising PCT 3262 do not occur.

Figure 1 is a diagram indicating the location of the subject site in the Sydney region (Nearmap 2025).

Figure 2 is a locality aerial image of the subject site (blue marker) and surrounds in relation to landscapes and current urbanisation (Nearmap 2025).

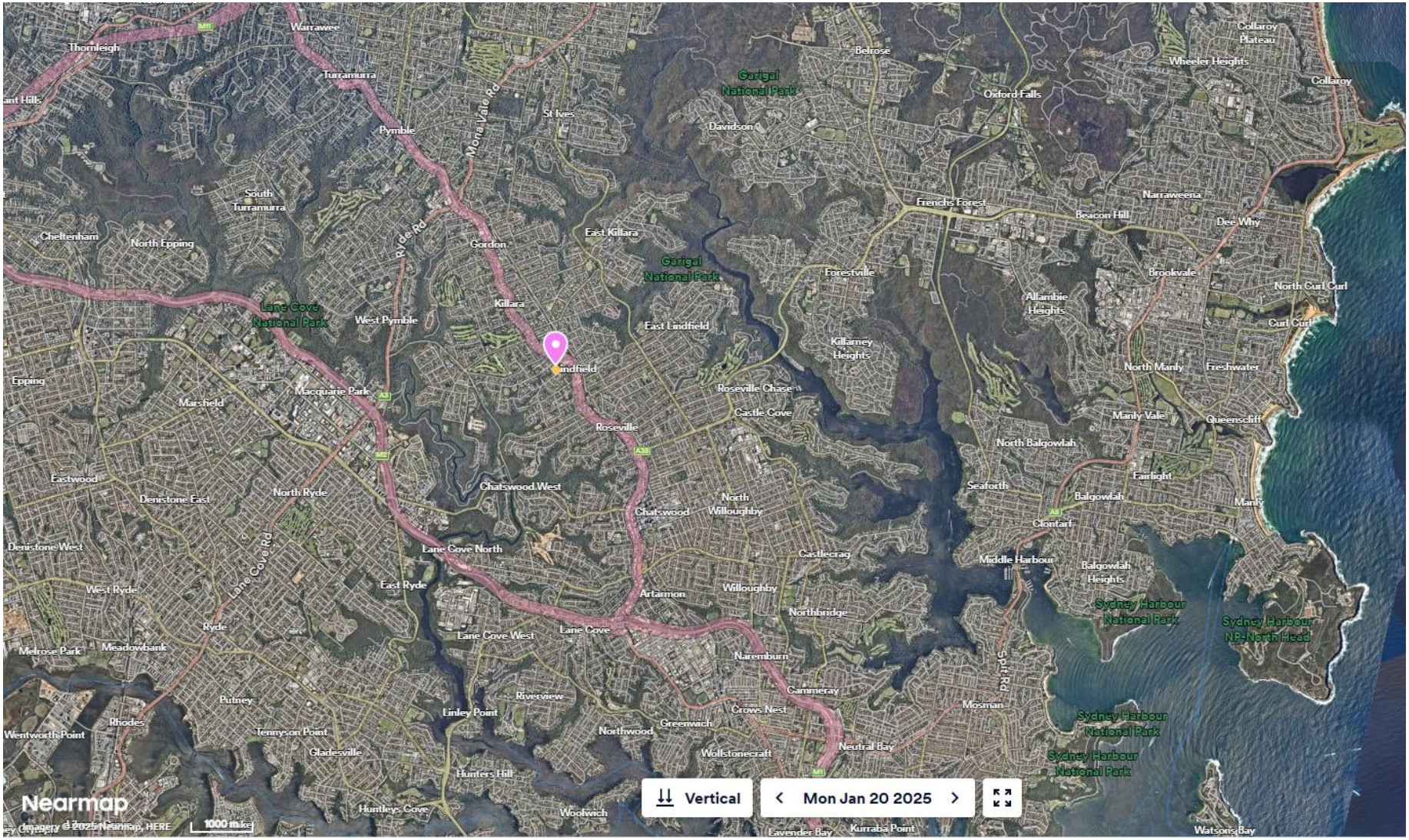
Figure 3 is an aerial image of the subject site at Balfour Street, Lindfield, indicating the long-established, urbanised landscaped vegetation occurring at the subject site.

Figure 4 is a site plan indicating that the TPZ's of trees occurring in neighbouring properties are not impacted by the proposed development (Giles tribe 2026).

Figure 5 is a schematic image of the proposed development area, indicating tree numbers within and outside the development footprint (from Naturally Trees 2026) and showing which trees will be removed as part of the development.

Figures 6, 7, 8 & 9 indicate typical established landscaped urbanised vegetation occurring in well managed gardens occurring in front yards, along the side fence-lines and in rear yards of the four subject properties.

Very few native species occur throughout the subject areas, the location of these, including mostly forbs, ferns and grasses are depicted in Figure 10.



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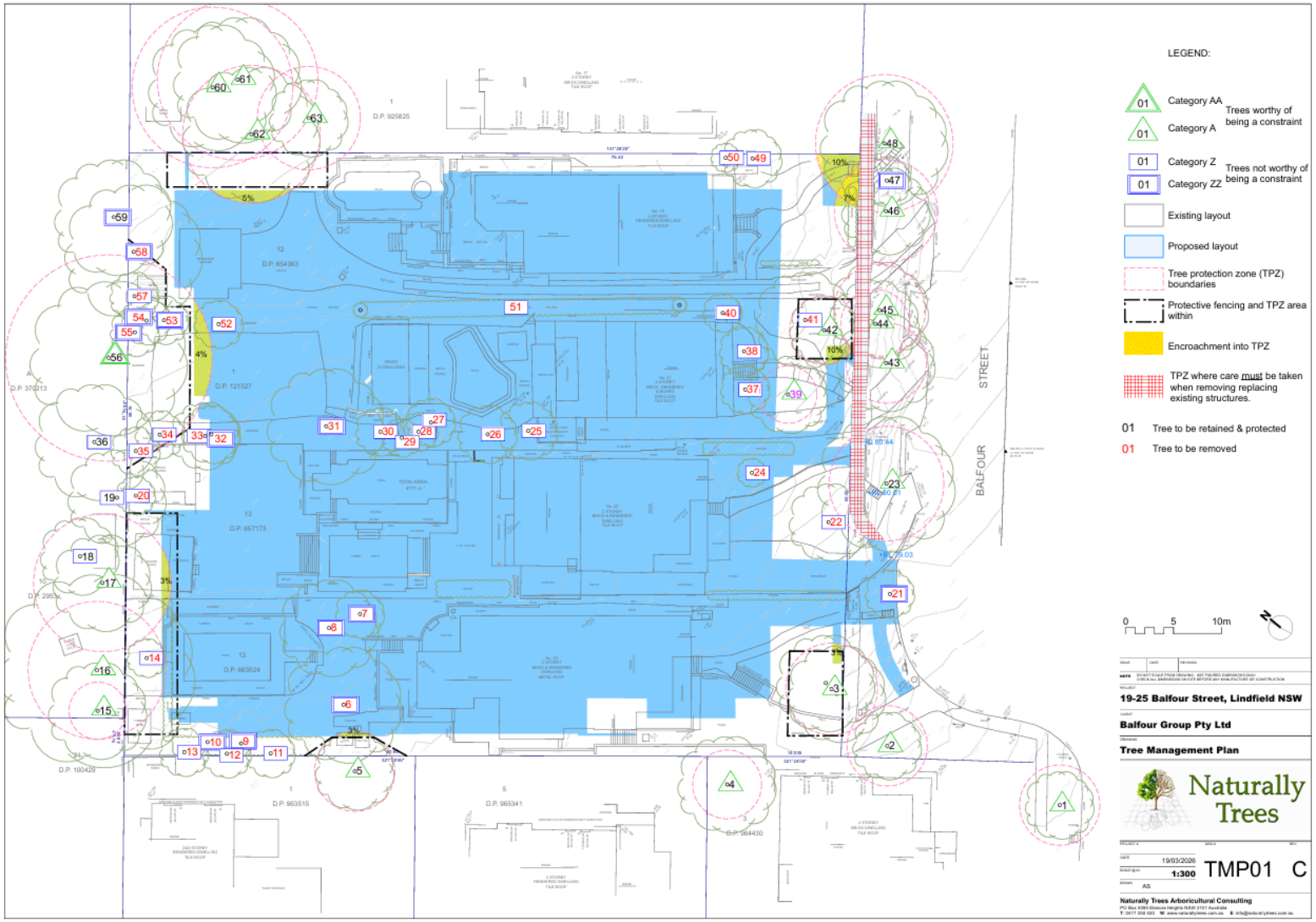

Figure 5 – Schematic image taken from the arboricultural impact assessment (AIA) report showing the proposed development footprint (blue shading) overlain by trees to be removed (mostly exotic species - red numbers) and those to be retained (mostly occurring outside the property boundaries - green numbers) (Naturally Trees 2026).

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Figure 9 – Front yard of No. 25 Balfour St Lindfield showing managed lawns of Buffalo Grass and garden beds of exotic ornamental species such as Jacaranda, Gardenia, Agapanthus, Murraya, Montbretia, Dietes and Rosemary etc

1.3 Sampling vegetation attributes

A single vegetation zone was delineated based on the uniform area of managed, urbanised vegetation within lots. This was sampled for vegetation composition attributes in a quadrat of size 10 x 40m to derive a Vegetation Integrity Score (VIS) of the current vegetation state at the site and to be compliant with the BAM methodology. This area and an additional area comprising 600m^2 within the subject area was sampled for functional attributes. The location of the plots was chosen to incorporate as much native vegetation as possible.

BAM attributes for floristic composition, structural variation and functional attributes were sampled on the 2nd of April 2025.

Figure 10 indicates the location of the sampling area at the subject property, as well as occurrences of native species elsewhere at the subject areas.

These plots provided the attributes that were used to derive potential offsets. The plots were orientated from the north-east to the south-west.

Table 1 summarises environmental and biotic attributes recorded in the floristic plot (PLOT 1).

DESCRIPTION	MEDIUM TALL FOREST
PLOT COORDINATES	- 33.775225 151. 165286
(NE Corner of quadrat)	
BEARING	240^0 SW
APPROX TREE CANOPY COVER (%)	~28%
TOTAL NUMBER LOCALLY-OCCURRING NATIVE SPP	3
LOCALLY- OCCURRING NATIVE CANOPY SPP OCCURRING AT >5% COVER IN 400m PLOT	*Eucalyptus sp (appears as sp of red gum),*
LOCALLY-OCCURRING NATIVE SPP OCCURRING AT <5% COVER IN 400m PLOT	*Oplismenus aemulus, Viola hederacea*

Table 1 - Summarises abiotic environmental and biotic attributes recorded at the sampled plot at the subject land.

Figure 10 - Sampled quadrats at the subject land, the 400m² quadrat shaded in blue, the larger quadrat for additional functional attributes shaded in green (Nearmap 2025). The various star icons indicate the location of some native species that occur throughout the subject site

1.4 Extent of land to be affected by proposed development

The mapping of Biodiversity Value indicates that there is Biodiversity Value associated with the subject property (Figure 12), and biodiversity offsets would be required for the proposal (BAM 2020).

However, the Biodiversity Values Mapping is based on vegetation mapping of PCT3262 (Sydney Turpentine Ironbark Forest) of individuals of tall mature tree species that previously occurred in parts of the subject site, including a dead individual of Blue Gum that occurs at the rear of No. 19, a dead individual of Turpentine that occurs within the central section of No. 25 and a removed individual of Sydney Red Gum that occurred at the rear of No. 23 Balfour Street, Lindfield (Ku-ring-gai Council *pers comm*). None of these trees have viable hollows that could be classified as habitat features.

Surrogate plots of extant STIF were not considered justified in this instance and current state of the vegetation was surveyed to reflect current biodiversity values on the subject land given that biodiversity values appear to have changed within the last 5 years (as per Biodiversity Assessment Method Operational Manual – Stage 1).

Figures 10 & 12 indicates the extent of live native vegetation (individual species that may be elements of PCT 3262) that would be impacted by the proposed development. As such, the potential area of impact of the new proposed apartment towers on elements of PCT 3262 within the subject land is estimated at 121m^2 (or 0.0121ha)

As such, a total extent of 0.0121ha is used for land that is impacted and included in offset evaluation by the BAM Calculator.

The plant community has been mapped by DCCEEW (2025) on the basis of mature trees occurring in neighbouring rear yards, the trees that were present within the subject land that have died (Figure 13), the geology of the local substrate, as well as the position on slope, as Sydney Turpentine Ironbark Forest (PCT 3262) (DCCEEW 2025).

This report will determine the number of Biodiversity Credits that may be required to offset the loss of 0.0121ha of potential 'Sydney Turpentine Ironbark Forest' (PCT 3262), the offset to be paid under the NSW Biodiversity Offsets Agreement Management Scheme (BOAMS).

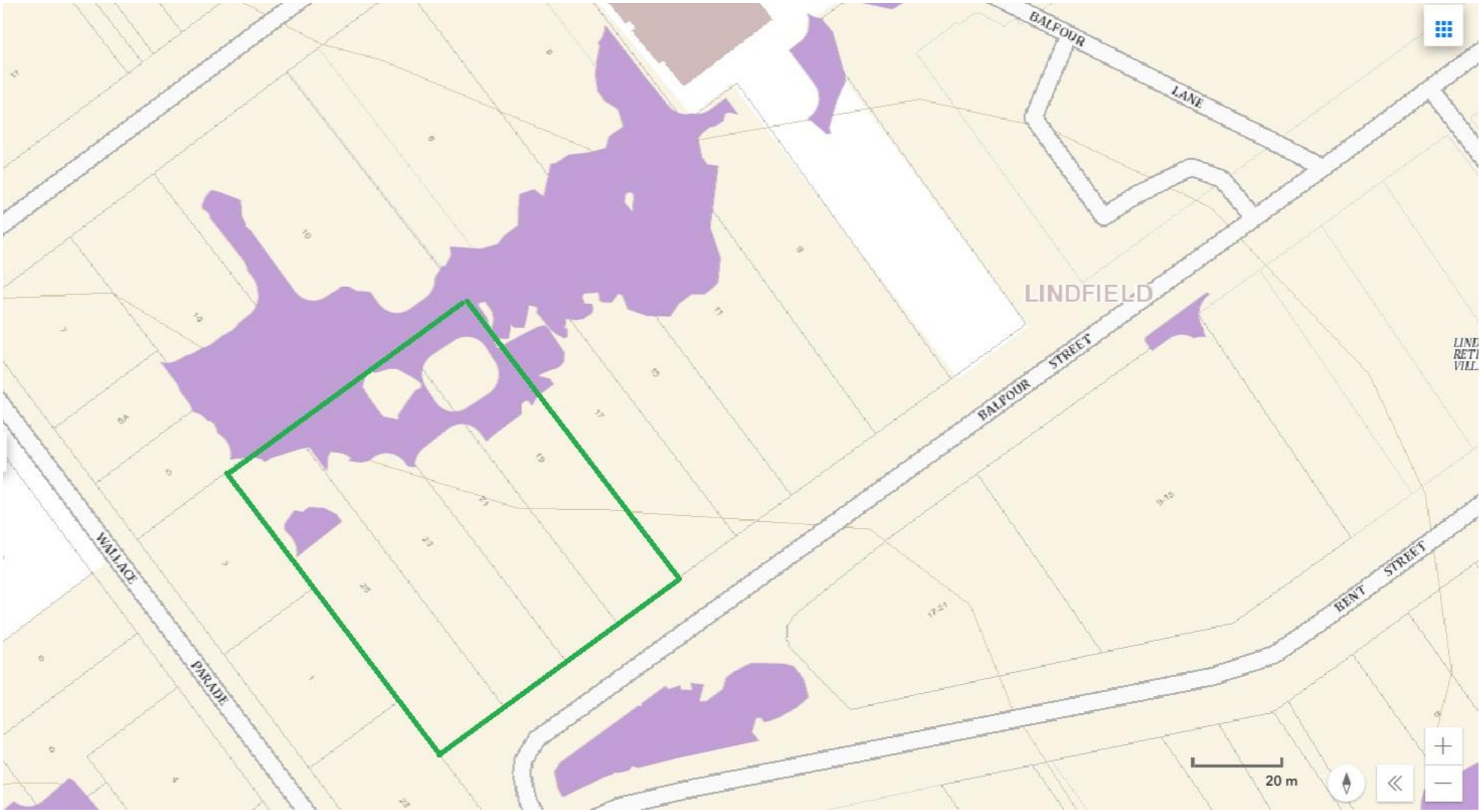


Figure 11 - Biodiversity Values (BV) map indicating that the subject land (green outlined border) at its northern sections have been mapped as having biodiversity value (purple shading) (DCCEEW 2025) due to former occurrences of component trees of PCT 3262 and TPZ"s of component trees occurring in neighbouring allotments

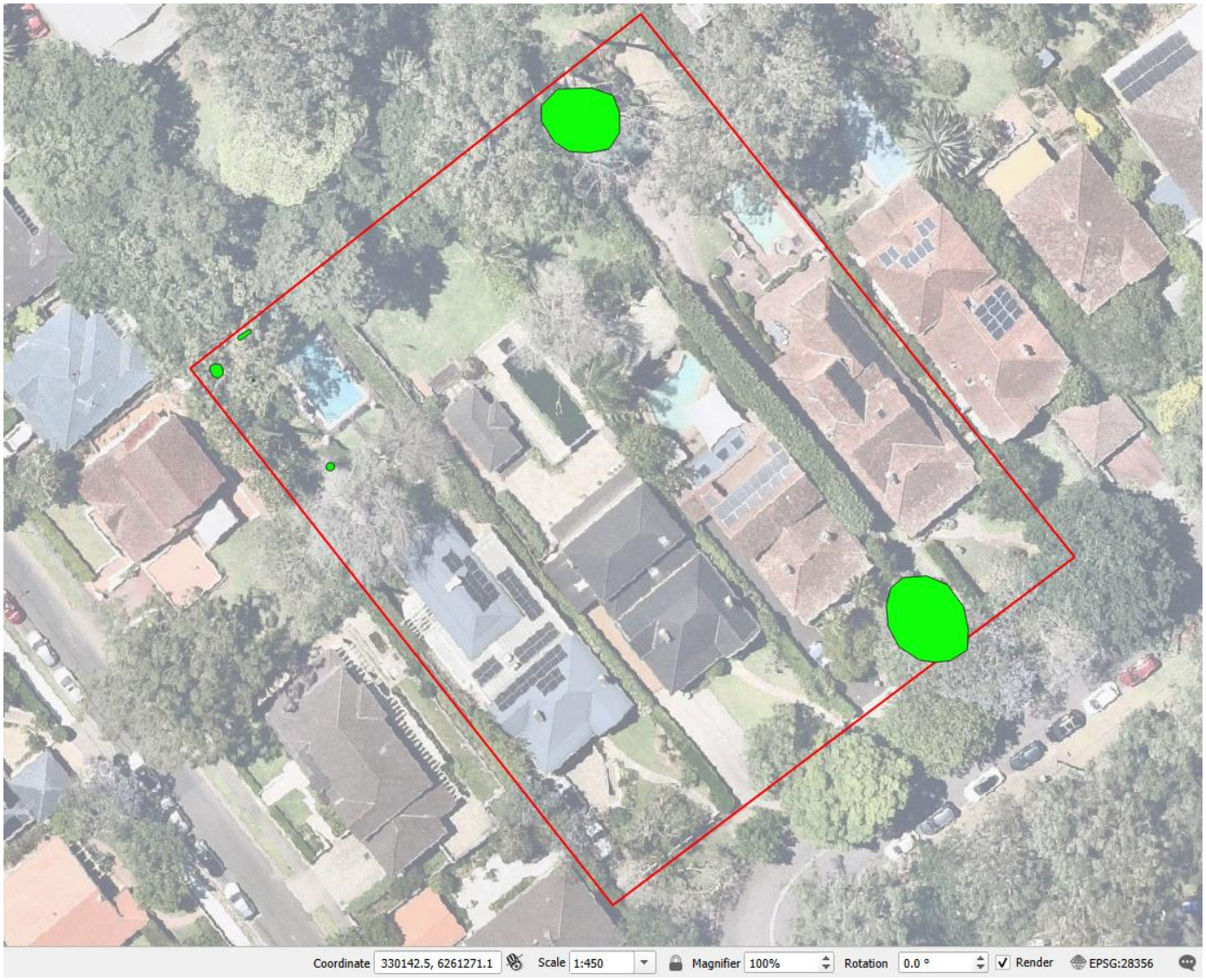


Figure 12: Areas of native vegetation that will be impacted by the development (green shading), totaling an area of 121m^2.

Figure 13 - Stag of dead individual of Turpentine to 24m tall with DBH 1400mm occurring in central section of No. 25 Balfour Street, Lindfield (Naturally Trees 2025)

1.5 Biodiversity Offsets Scheme Entry

Preparation of a Biodiversity Development Assessment Report (BDAR) in accordance with the Biodiversity Assessment Method (BAM) is required under the NSW Biodiversity Conservation Act (BC Act) as the proposal is a Major Project (State Significant Development – Div. 4.7 EP&A Act). The land is also mapped as having Biodiversity Values (Figure 13) at the rear of the properties.

Area of clearing limits for application of the small area development

Min Lot Size	Max area clearing limit
Less than 1 ha	≤1 ha
Less than 40 ha but not less than 1 ha	≤2 ha

The Minimum Lot Size for 19-25 Balfour St is 840m2, or 0.08ha each (Ku-ring-gai Council LEP 2015) and the area of native vegetation to be impacted is less than 1ha. As such, a site-based Small Area Assessment is appropriate as per Appendix C (Table 13) and Appendix L (Table 27) in the BAM 2020, and has been applied to this assessment in the BAM-C.

1.6 Information Sources

The following documentation was referred to in preparation of this BDAR;

- Arboricultural Impact Assessment: Naturally Trees (2025 & 2026)
- Architectural Drawing Set: Giles Tribe Architects (2025 & 2026)
- Ku-ring-gai Council LEP (2015)
- Ku-ring-gai Council DCP (2024)

And the following external sources of information/resources were used;

- Commonwealth DCCEEW Environmental Protected Matters Search Tool (2025)
- Commonwealth DCCEEW Directory of Important Wetlands (2025)
- Commonwealth DCCEEW Species Profile and Threats Database (2025)
- DPE Threatened Species, Populations and Ecological Communities website (2025);
- Guidelines for detecting bats listed as 'threatened' under the Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth of Australia 2013).
- Nearmap Aerial Imagery tool (2025)
- NSW BioNet Atlas of NSW Wildlife (2025)
- NSW BioNet Threatened Biodiversity Data Collection (TBDC) (2025)
- NSW BioNet Vegetation Classification (2025)
- NSW Guide to Surveying Threatened Plants (OEH 2016);
- NSW Scientific Committee Final Determinations (1996-2025)
- NSW SEPP (Resilience and Hazards) (2021)
- NSW Department of Planning, Industry and Environment (2025) eSPADE Soils and Landscapes
- PlantNet NSW Flora Online (2025)
- Sharing and Enabling Environmental Data online portal (SEED 2025)
- 'Species credit' threatened bats and their habitats: NSW survey guide for the Biodiversity Assessment Method (DPIE 2021);
- RoTAP (Briggs and Leigh 1996) databases.
- Survey guidelines for Australia's threatened birds. Guidelines for detecting birds listed as threatened under the EPBC Act 1999 (Commonwealth of Australia 2010a);
- Survey guidelines for Australia's threatened frogs. Guidelines for detecting frogs listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth of Australia 2010c);
- Survey guidelines for Australia's threatened mammals. Guidelines for detecting mammals listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth of Australia 2011);
- Survey guidelines for Australia's threatened orchids (2017);

- Threatened Biodiversity Survey and Assessment: Guidelines for Developments and Activities (Department of Environment and Conservation 2004);
- Threatened species survey and assessment guidelines: field survey methods for fauna: Amphibians (DEC 2009);
- QGIS version 3.34.5, EPSG 28356

2 SITE CONTEXT

2.1 Assessment Area

The assessment area includes the subject land and a 1500m buffer surrounding the edge of the property boundary for site-based development. Figure 14 shows the assessment area for 19-25 Balfour St, Lindfield.

2.2 Landscape Features

2.2.1 IBRA Regions and Subregions

The subject site occurs within the Sydney Basin IBRA region and the Cumberland IBRA Subregion.

The Sydney Basin Bioregion is on the east coast of NSW, covers approximately 3,629,597ha and includes a significant portion of the Hawkesbury-Nepean, Hunter and Shoalhaven catchment river systems.

The Cumberland Subregion is approximately 275,693ha containing the Cumberland Plain, and extends from Kurrajong in the north to Yanderra in the south. It's composed of Triassic Wianamatta Group shales and sandstones and Quaternary alluvium along the main streams. Characteristic landforms include low rolling hills and wide valleys, with swamps and lagoons on the floodplain of the Nepean River.

2.2.2 Topography, geology and soils

The local substrate geology of the subject area occurs on the Triassic Ashfield Shale of the Wianamatta Shale group of sediments, consisting of black to dark-grey shale and laminite (Herbert 1983).

The soil landscape of the site is classified as the erosional 'Glenorie' Soil Landscape Series (DCCEEW 2025).

The 'Glenorie' soil landscape series is characterised by undulating to rolling low hills, narrow ridges, hillcrests and valleys on Wianamatta Group shales. Gradients are at 5-20%, relief 50-80m. The vegetation is typically extensively cleared tall, open, wet sclerophyll forests.

Soils are shallow to moderately deep (<100cm) red podzolics on crests, moderately deep (70-150cm) red and brown podzolics on upper slopes, deep (> 200cm) yellow and gleyed podzolics along drainage lines (DCCEEW 2025).

2.2.3 Mitchell Landscapes (NSW Landscape regions)

The landscape features of the subject site included in a 1500m buffer zone centred around the subject site occurs within the Pennant Hills Ridges landscape in the Pittwater IBRA Subregion within the Sydney Basin IBRA region.

The Mitchell Landscape is described as follows:

Rolling to moderately steep hills on horizontal Triassic shales and siltstones. General elevation 10 to 90m, local relief 60m. Deep red texture-contrast soils on narrow hillcrests, red and brown to yellow texture-contrast soils on slopes becoming slightly harsher in drainage lines.

Tall open forest of Sydney blue gum (*Eucalyptus saligna*), turpentine (*Syncarpia glomulifera*), blackbutt (*Eucalyptus pilularis*), white stringybark (*Eucalyptus globoidea*), grey ironbark (*Eucalyptus paniculata*), forest oak (*Allocasuarina torulosa*) and rough-barked apple (*Angophora floribunda*).

Rainforest elements in protected moist gully heads with sweet pittosporum (*Pittosporum undulatum),* cheese tree (*Glochidion ferdinandi*), sandpaper fig (*Ficus coronata*) and black wattle (*Callicoma serratifolia*).

2.2.4 Connectivity

Landscapes that retain connections between patches of otherwise isolated areas of vegetation are more likely to maintain more numerous and more diverse populations of plant and animal species (Lindenmayer and Fischer 2006).

In the subject locality the canopy cover is highly fragmented with little connectivity among adjacent properties and surrounding canopies. It is considered that any potential connectivity to the biodiversity corridor that currently exists in the area would not be significantly impacted (Figure 14).

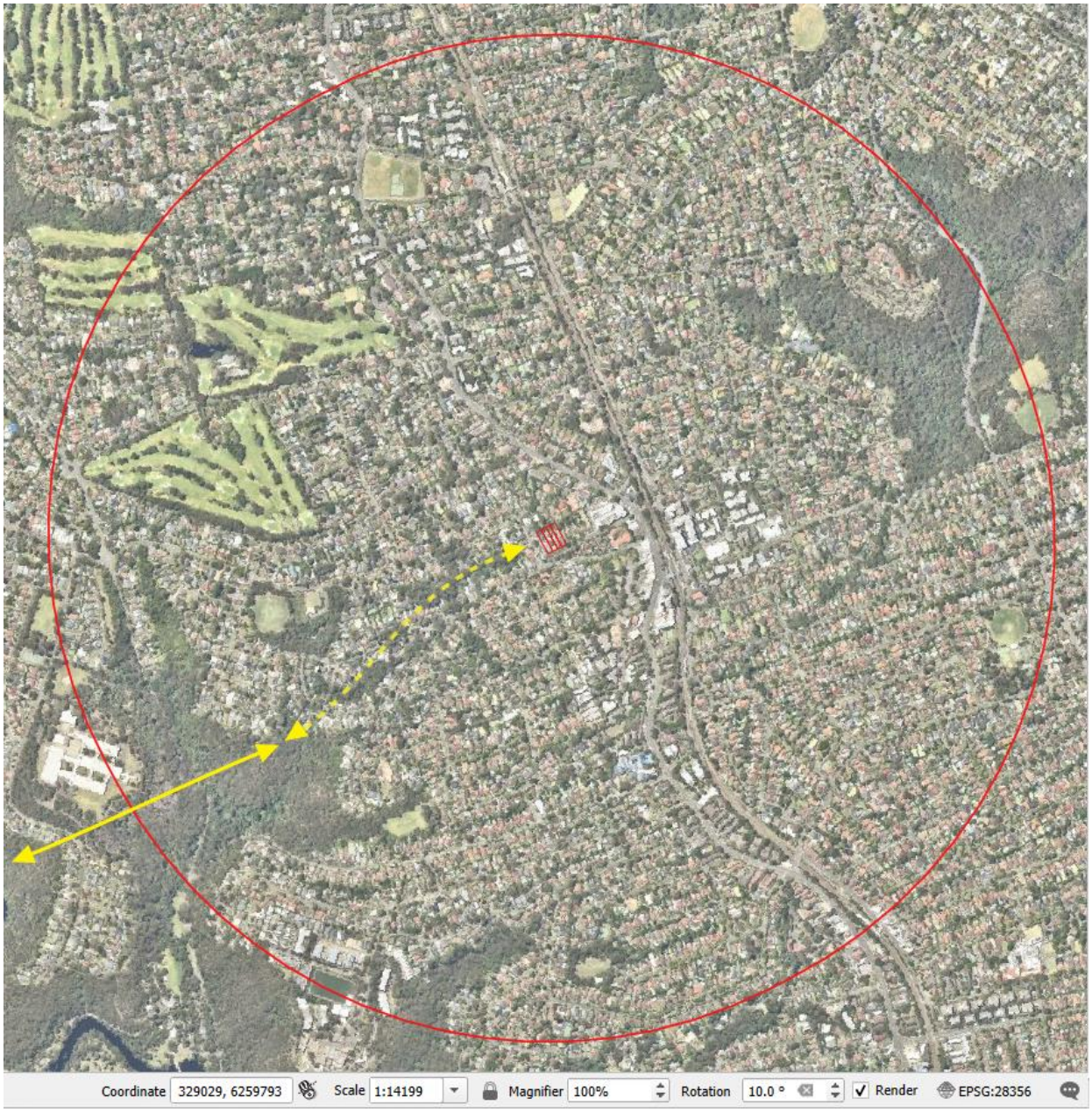


Figure 14: The assessment area includes a 1500m buffer from the edge of the subject site. Potential vegetation corridors are shown in yellow.

2.2.5 Areas of geological significance and soil hazard features

These features are not present on the subject land. The landscape is stabilised by vegetative cover, dead foliage and building rubble and no evident soil creep or landslip features are apparent.

2.2.6 Areas of Outstanding Biodiversity Value (AOBV)

AOBV are special areas that contain irreplaceable biodiversity values that are considered important to NSW, Australia or globally. No listed AOBV occur within the site or within a 1,500m area buffer around the subject site.

2.2.7 Wetlands, Rivers, Streams and Estuaries

Within the buffer area of the subject site there are 6 first order streams and one second order stream that are recognized under the Water Management Act 2010 as can be seen on the NSW Water Management Regulation 2018 Hydroline Spatial Data (Figure 15). The closest first order stream is Little Blue Gum Creek which lies approximately 400m to the west of the subject site and the second order stream is Gordon Creek, approximately 1.2km to the north east. First order streams require a protected riparian zone of 10m around the streams and second order streams require 20m. As these zones lie outside the impact area of the subject site, it is considered that the proposal will have no impacts on the hydrological function of these streams.

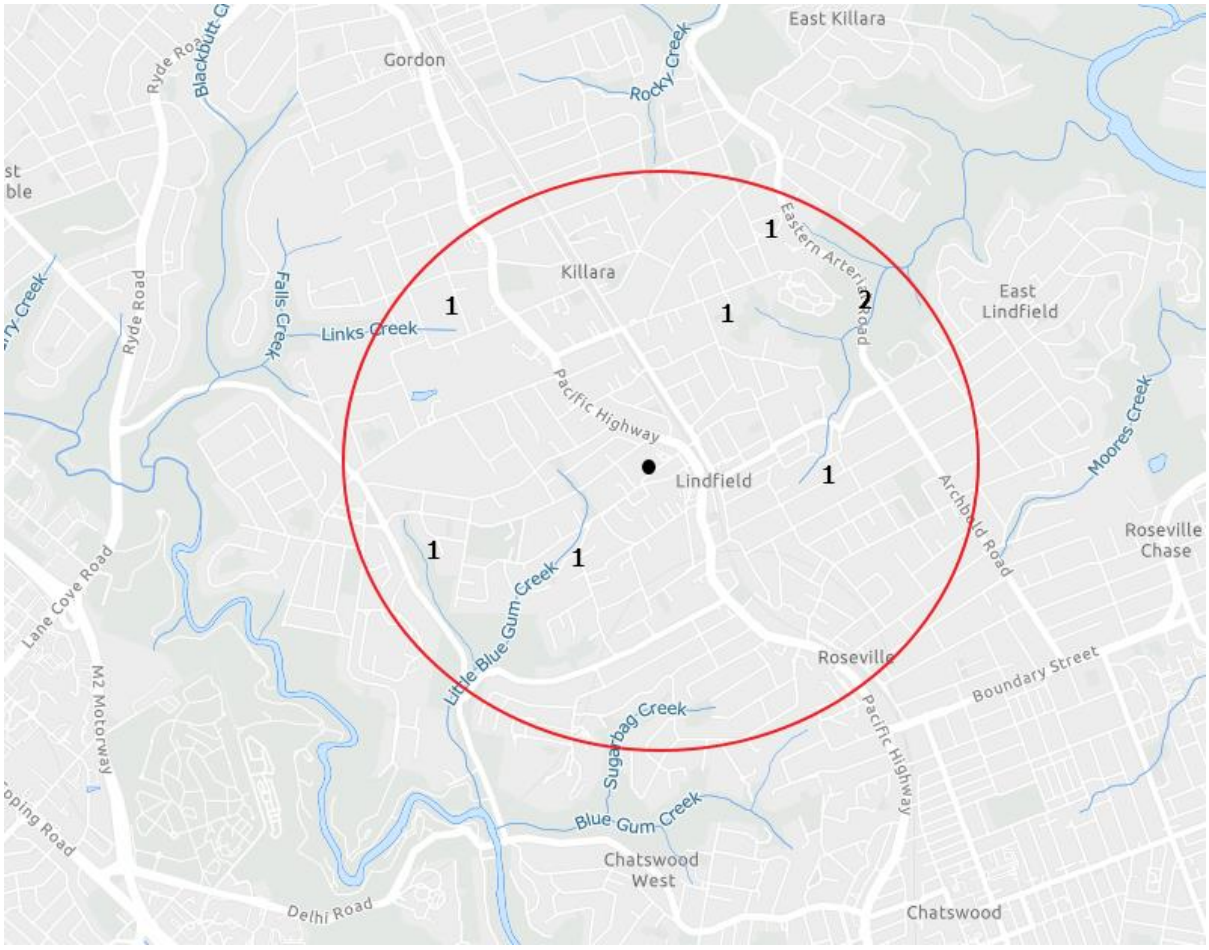


Figure 15: Streams located within the assessment area of the subject site (black dot) (Hydroline 2025).

2.3 Native vegetation cover in the assessment area

Native vegetation cover is calculated as a percentage cover occurring on the subject land and within the surrounding 1,500m buffer area (Figure 14) (Drevon GIS 2025).

Cover estimates are based on the cover of native woody and non-woody vegetation relative to the approximate benchmarks for the PCT considering the extent and condition of the vegetation.

Figure 16 indicates the extent of areas within the 1,500m buffer area that have been mapped as native vegetation DCCEEW (2025). This airborne mapping was reviewed and accepted after ground truthing via road side drive-bys where appropriate.

Using this mapping, it is estimated that the native vegetation cover within the 1500m buffer area to the subject site 19.2% (Drevon GIS 2025).

2.3.1 Patch size

Patch size is used to describe areas that include native vegetation with a gap of less than 100m from adjacent or surrounding areas of native vegetation that occur in moderate to good condition.

The patch size for the vegetation onsite is assessed as 141.5ha (Drevon GIS 2025), which is in the > 100ha hectare class.

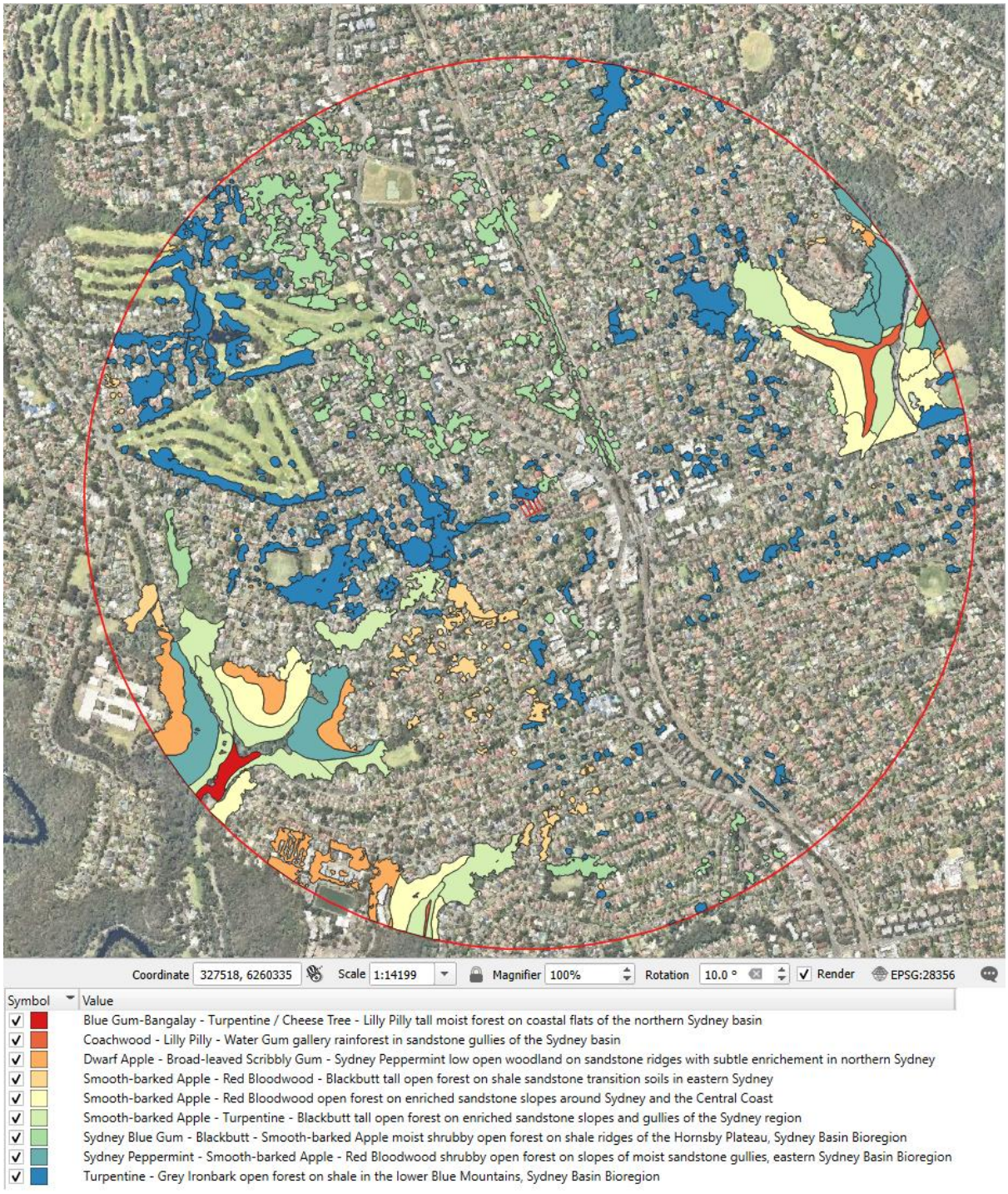


Figure 16 - Indicates the 1500m buffer zone surrounding the subject site at Lindfield where % vegetation within the buffer zone is 19% and patch size estimated at 141.5ha (Drevon GIS 2025)

3 NATIVE VEGETATION

3.1 Native vegetation extent within subject site

The majority of the vegetation in the front and rear of the properties consist of landscaped yards and lawns with planted exotic ornamentals, including species such as *Clivia miniata* (Clivia), *Cupressus sp. (*Cypress Pine), *Buxus microphylla* (Buxus hedge), *Hydrangea macrophylla* (Garden Hydrangea), *Nephrolepis cordifolia (*Fishbone fern) and *Murraya paniculata* (Orange Jessamine).

A small number of non-native canopy species exist at the site, such as *Jacaranda mimosifolia* (Jacaranda), *Magnolia grandiflora* (Southern Magnolia), *Acer palmatum* (Japanese Maple) and *Archontophoenix alexandrae* (Northern Bangalow Palm).

A few native ground and shrub species were also noted with very low cover, such as *Adiantum aethiopicum* (Common Maidenhair), *Oplismenus aemulus* (Basket Grass) and *Viola hederacea* (Native Violet) (Figure 11).

Few live native canopy trees exist at the subject site. The three native trees within the lot boundaries are dead or dying, lack hollows and are marked for removal as part of the development (Trees 6, 31 and 58, Naturally Trees 2025; Figure 13).

An individual of eucalypt (likely a species of Red Gum) occurs within the front yard of No. 21 Balfour Street, and will be impacted by the development and its canopy spread is included in the area impacted by the proposed development (Naturally Trees 2026).

The remaining native trees occur outside the lot boundaries, and their Tree Protection Zones (TPZs) do not encroach within the development's impact zone (Figures 3 & 5; Naturally Trees 2026).

Appendix 1 contains a full list of flora species found at the subject site, and Figures 7, 8, 9 & 10 indicate typical vegetation occurring within the front and rear yards of the residential properties.

The total area of isolated patches of native vegetation cover, including trees, shrubs, grasses, forbs and ferns, within the site was estimated at about 2.5% of the total area of the subject property (Figure 11) and equates to about 121m^2 (mostly afforded by an individual of eucalypt with a canopy spread of 12m (Naturally Trees 2025).

The extent of isolated patches native vegetation intended for removal is estimated to be about 0.0121ha or 121m^{2,} and includes a patch of Basket Grass, an individual of Maidenhair Fern, an individual of eucalypt (*aff.* Red Gum) a patch of Native Violet, a sapling of the opportunistic species White Cedar, and a sapling of Cabbage Tree Palm (Figure 11).

This extent equates to about 2.5% of the total area of the development site, the large proportion consisting of managed gardens and lawns of ornamental and exotic plant species (Figures 7, 8, 9 & 10).

As such, a total of 0.0121ha was included in the BAM calculator for the potential impacted area of native vegetation which would be cleared to construct a new apartment block for ToD development.

3.2 Plant Community Types (PCTs)

3.2.1 Plant Community Type mapped and PCT assessed as occurring at the site

Mapping by DCCEEW (2025) indicates that parts of the rear yards of the 4 properties contain elements of Sydney Turpentine Ironbark Forest (Plant Community Type 3262) (Figure 17), which is a critically endangered ecological community listed under registers of the BC Act (2016) and the Commonwealth EPBC Act (1999).

In order to determine and review the mapping, the native species recorded (including native canopy species found in adjoining properties as a surrogate plot) were run through the Bionet Vegetation Database filter to return possible matching PCTs.

The Bionet filter returned 16 possible PCTs with matches on all 6 or more native species. Nine were discounted based on incorrect IBRA Sub Region and another 2 based on incorrect formation, being rainforest.

Of the remaining 5, PCT 3615 (Sydney Hinterland Apple-Blackbutt Gully Forest) was discounted due to location, being found in sandstone gullies in the upper Nepean and Georges River catchments in south-western Sydney. Similarly, PCT 3592 (Sydney Coastal Enriched Sandstone Forest) and PCT 3176 (Sydney Enriched Sandstone Moist Forest) both occur on enriched Hawkesbury Sandstone in gullies or on sheltered slopes, and so were discounted based on substrate geology.

The remaining PCTs were 3136 (Sydney Blue Gum High Forest) and 3262 (Sydney Turpentine Ironbark Forest), both of which are found on shale substrates in the northern suburbs of Sydney.

A comparison of theses PCTs is shown below in Table 2

PCT	3262 (Sydney Turpentine Ironbark Forest)	3136 (Sydney Blue Gum High Forest)
Formation	Wet Sclerophyll	Wet Sclerophyll
Sub Formation	Shrubby	Grassy
Substrate Geology	Shale or sheltered shale-sandstone soils	Rich shale soils in high rainfall areas of north shore, in gullies, ridgelines and slopes underlain with Wianamatta Group shales
Dominant Canopy	*Syncarpia glomulifera, Notelaea longifolia, Allocasuarina torulosa, Angophora costata*	*Eucalyptus saligna, Eucalyptus pilularis, Syncarpia glomulifera, Notelaea longifolia*
Freq of *Eucalyptus saligna*	5	84
Freq of *Brachychiton acerifolius*	8	30
Grades into	3136 in higher rainfall shale-rich soils on north shore	3262 on thinner shale soils on slopes

Table 2: Comparison of suitable Plant Community Types at the subject site

On the Cumberland Plain, Turpentine-Ironbark Forest grades into Blue Gum High Forest where the annual rainfall exceeds 1050 mm (at around 100m), i.e. ascending the Hornsby Plateau (Tozer 2003). The presence of *Eucalpytus saligna* as the dominant native canopy species in the immediate surrounds of the subject site would suggest that the more likely fit is PCT 3136 (Blue Gum High Forest), however the shale substrate likely has a sandstone influence at the subject site, and it is not located in a gully, ridgeline or slope. This concurs with the current mapping by DCCEEW (2025).

As such, PCT 3262 was entered into the BAM calculator as the relevant PCT for this assessment.

The current state of the plant community at the subject site however, is highly urbanized with the understorey replaced by managed garden beds of mostly exotic ornamentals

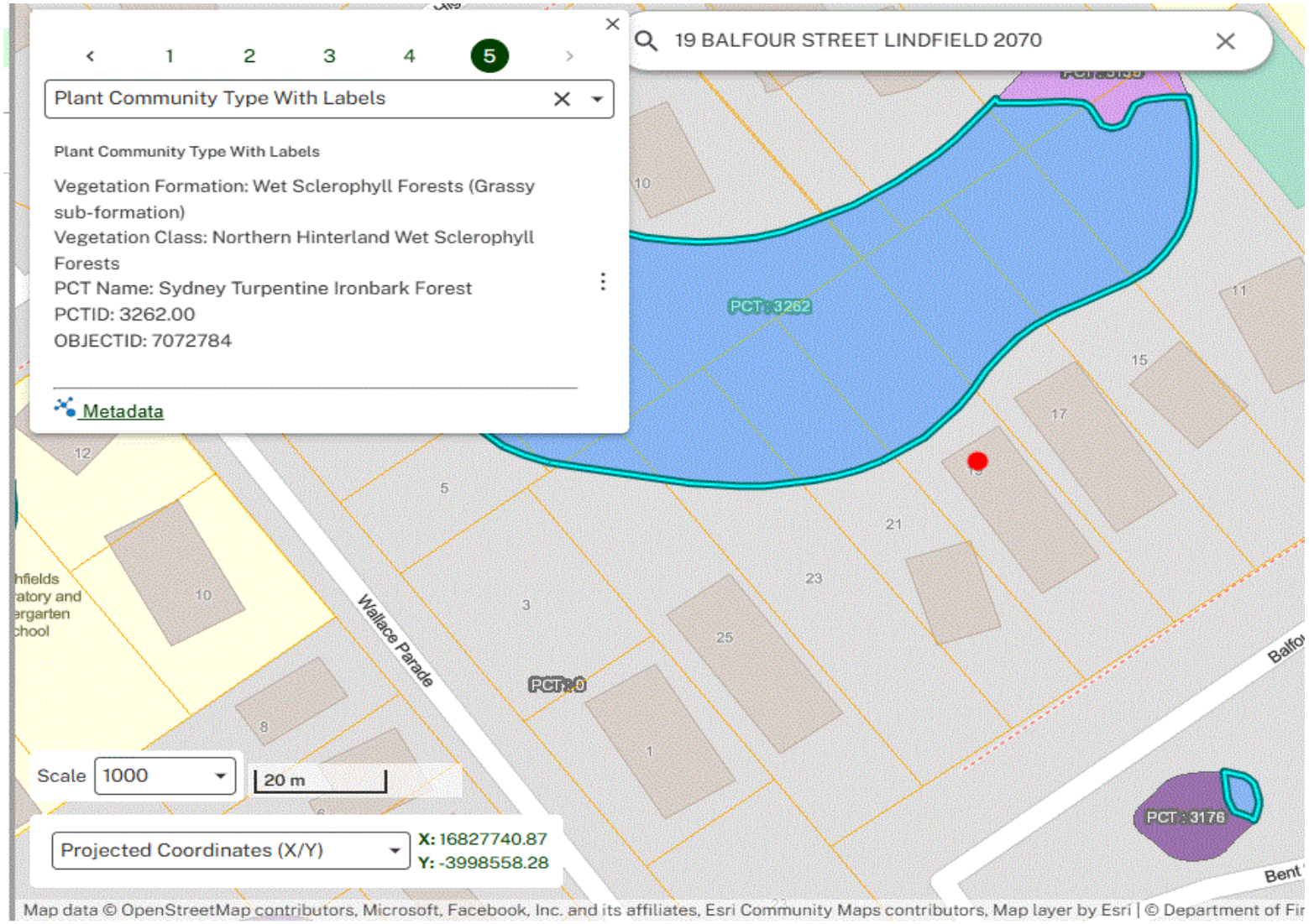


Figure 17 - Mapping of ecological communities in the locality including the Study Area indicating a distribution of Sydney Turpentine Ironbark Forest (PCT 3262) occurring in a wide band (blue shading with aqua border) through the northern sections of the subject properties (red dot) (DCCEEW mapping 2025).

Description of PCT 3262 (STIF) from Bionet Vegetation Classification (DCCEEW 2025)

Plant Community Type ID (PCT ID): 3262

PCT Name: Sydney Turpentine Ironbark Forest
Classification Confidence Level: 1-Very High
Total Number of Replicates: 132
Number of Primary Replicates: 120
Number of Secondary Replicates: 12
Vegetation Description: A tall to very tall sclerophyll open forest with mid-stratum of mixed sclerophyll and mesophyll shrubs and a ground layer of grasses and forbs, found on shale or sheltered shale-sandstone soils mainly in the northern suburbs of Sydney and lower Blue Mountains. The tree canopy very frequently includes Syncarpia glomulifera either as a canopy dominant or as a smaller tree or both. Other species which are localised and occasionally dominant or co-dominant occasionally include Eucalyptus pilularis, Angophora costata and Eucalyptus punctata, rarely with one of several species from the ironbark, stringybark or mahogany eucalypt groups of which Eucalyptus paniculata, Eucalyptus globoidea and Eucalyptus resinifera are the most frequent of each group. The mid-stratum is layered, with a sparse cover of small trees that includes eucalypts, occasionally Acacia parramattensis and Allocasuarina torulosa, rarely with Allocasuarina littoralis. The lower shrub layer very frequently includes Pittosporum undulatum and Leucopogon juniperinus, commonly with Breynia oblongifolia, Polyscias sambucifolia, Ozothamnus diosmifolius and Notelaea longifolia. The ground layer includes a diverse cover of grasses that very frequently includes Microlaena stipoides and Entolasia stricta, commonly with Imperata cylindrica, Entolasia marginata and Themeda triandra. Small forbs including Lobelia purpurascens are also very frequent, together with Lomandra longifolia. This PCT occurs as small remnants in mosaics of urban land use in the shale-dominated landscapes in higher rainfall zones of the Sydney Metropolitan area. The northern suburbs between Baulkham Hills and Ku-ring-gai include the highest number of remnants, however small areas remain in Sutherland, Heathcote, Menai, lower Blue Mountains and Oakdale plateau west of Picton. Only a small number of remnants remain on the Wianamatta Group shales of the eastern Cumberland Plain between Villawood and Bankstown. This community grades into tall moist shrub forests PCT 3136 in higher rainfall shale-rich soils on the north shore, or into PCT 3620 in sandstone environments. On the margins of the Cumberland Plain it may grade into dry forests PCTs 3321 or 3616 with increased exposure.
Vegetation Formation: Wet Sclerophyll Forests (Grassy sub-formation);
Vegetation Class: Northern Hinterland Wet Sclerophyll Forests;
IBRA Bioregion(s): Sydney Basin;
IBRA Sub-region(s): Burragorang; Cumberland; Pittwater; Sydney Cataract; Wollemi;
LGA: BLUE MOUNTAINS; CAMPBELLTOWN; CANADA BAY; CANTERBURY-BANKSTOWN; HAWKESBURY; HORNSBY; KU-RING-GAI; CITY OF PARRAMATTA; RYDE; SUTHERLAND SHIRE; THE HILLS SHIRE; WOLLONDILLY;
Elevation (m) (Min, Median, Max): 5.0 96.4 460.6
Annual Rainfall (mm) (Min, Median, Max): 806 1020 1256
Annual Mean Temperature (deg C) (Min, Median, Max): 14.16 16.60 17.09
Median Native Species Richness per plot: 44
TEC Assessed: Has associated TEC
TEC List: Listed BC Act,CE: Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion (Equivalent); Listed EPBC Act,CE: Turpentine-Ironbark Forest of the Sydney Basin Bioregion (Part);
TEC Comments: (Comment TEC1) Relates to the NSW Sydney Turpentine-Ironbark Forest TEC. (Comment TEC2) Relates to the Commonwealth Turpentine-Ironbark Forest TEC where it occurs within the stated LGAs as per Section 4 of the Listing Advice (LGA boundaries as at 26 August 2005) and fits the condition classes as per Section 3 of the Listing Advice.
PCT Percent Cleared: 95.91
PCT Definition Status: Approved

3.2.1 Plot data used in BAM Calculator

The area containing Plot 1 (Figure 11) was subject to BAM analysis for a Vegetation Integrity Score that may require biodiversity offsets.

The data for Plot 1 is presented in Appendix 1.

3.2.2 Flora species occurring in plot

The complement of flora species and respective cover values are listed in Appendix 1.

3.2.3 Fauna species and potential fauna habitat

The area subject to offsets (Figure 11) mostly comprises established ornamental gardens and lawns (Figures 7, 8, 9 & 10) with very few locally-occurring native species representative of PCT 3262 occurring in the assemblage (Table 1; Appendix 1).

During the site survey no tree hollows were sighted in any mature trees or stags occurring within the development footprint (Figures 7, 8, 9 10 & 13).

A range of common native bird species may forage and overfly the mostly exotic canopy and shrub species present at the subject site, including Noisy Minor, Rainbow Lorikeet, Laughing Kookaburra, Little Wattle Bird, Red Wattle Bird and the Sulphur Crested Cockatoo. Natural tree cover is relatively sparse across the immediate locality, habitat not very suitable for arboreal species and species of avifauna.

The ground stratum has a high cover of ornamental plants (Figures 7, 8, 9 & 10) though with low weed cover and a very low native species diversity. This stratum contains a relatively poor structural habitat for sheltering and foraging.

3.2.3.1 Reptiles

Reptiles observed include the Dark-flecked Skink, though the Eastern Water Skink is also expected to occur.

3.2.3.2 Birds

A Titley Chorus Bat Detector was placed over a period of 7 days to record acoustic bird activity for a period of 2 hours each day (an hour either side of sunrise), totalling 14 hours of recordings.

These were analysed for bird activity in this area. In addition to the above, the most frequently recorded birds included the Rainbow Lorikeet (*Trichoglossus moluccanus*), the Australian Raven (*Corvus coronoides*), the Australian Magpie (*Gymnorhina tibicen*), and Grey Butcherbird (*Cracticus torquatus*).

3.2.3.3 Mammals

Bandicoot diggings were not found within the boundaries of the subject site but were noted in the rear garden of an adjoining property (14 Highfield Rd), likely belonging to the common Long-nosed Bandicoot, however no individuals were sighted or recorded.

Tree trunks did not show any activity of arboreal fauna markings, however some trees on the council verges and in adjoining properties contained bark fissures large enough to accommodate hollow-dwelling microchiropteran bats.

A Titley Chorus Bat Detector was configured to record ultrasonically for 2 hours each day (an hour either side of sunset) over 7 nights in an attempt to record any bat activity, and was placed in a corridor in the front garden of 19 Balfour Street.

A total of 216 sequences were recorded. Of these, 69 (32%) were of sufficient quality to enable a positive, or near positive identification.

Two categories of confidence are used for the identification of these species:

Definitely recorded (D), where the quality and structure of the call sequence is such that the identity of the bat can be made with a strong possibility of accuracy, and

Potentially recorded (P), where the quality and structure of the call sequence is such that there is some possibility of overlap between two or more species.

After analysis of the recorded sequences, there was found to be at least 5, possibly 7, species of microchiropterans recorded during the survey (Table 3).

The following table lists the results and indicates the status of the Bat under the Biodiversity Conservation Act (2016).

Scientific Name	Common Name	Presence	BC Act Status
Chalinolobus gouldii	Gould's Wattled Bat	D	
Miniopterus australis	Little Bent-wing Bat	P	Vulnerable
Ozimops planiceps	Southern free-tailed bat	P	
Ozimops ridei	Eastern Free-tail bat	D	
Saccolaimus flaviventris	Yellow-bellied sheath-tail bat	P	Vulnerable
Vespadelus pumilus	Eastern forest bat	P	
Vespadelus regulus	Southern forest bat	D	

Table 3 - Microbat species recorded at the subject site and Status under the NSW Biodiversity Conservation Act (2016)

It is not expected that any individuals of microbats will be impacted by the proposed development though it is expected that a targeted microbat survey is undertaken of any apparent roof cavities or under eaves where microbats may be roosting, at a time after the properties have been vacated but before demolition.

Demolition would involve removing sections of the roof sequentially during the evening when any potential roosting microbats will likely be foraging and not occupying any spaces in the buildings.

3.3 Vegetation Integrity Assessment

3.3.1 Vegetation Zone

The single vegetation zone comprises an established urbanised managed landscape with maintained lawns, gardens, hedges and rows or patches of mostly exotic trees.

Plot 1 was dominated by 1 tree species - an individual of eucalypt, most likely a species of red gum, likely not locally-occurring in the locality (Appendix 1).

There was one forb species Native Violet (*Viola hederacea*) that occurred sparsely in the ground layer of No. 21 Balfour Street and one native grass species, Basket Grass (*Oplismenus aemulus*) that also occurred sparsely in the ground layer of No. 21 Balfour Street.

The plot was located as shown in Figure 11.

Quantitative measures for species composition, structure and function attributes (Table 4) were derived from the intact vegetation within the plot as listed in Table 2 of BAM (2020).

The 10m x 40m plot was located within mostly intact vegetation, including lawns, hedges and small clumps of mostly exotic tree species and scores derived for functional attributes included the larger plot (Figure 11).

Condition attributes use to assess composition of vegetation	**Condition attributes use to assess structure within vegetation**	**Condition attributes use to assess functionality within vegetation**
Tree richness	Tree cover	Number large trees
Shrub richness	Shrub cover	Tree regeneration potential
Grass and grass-like richness	Grass and grass-like cover	Tree stem size classes Tree hollows
Forb richness	Forb cover	Total length of fallen logs
Fern richness	Fern cover	Litter cover
Other richness (Twiners, Palms etc)	Other cover (Twiners etc)	High Threat Weed cover

Table 4 - Condition attributes for composition, structure and function at plots (Table 1; Figure 8) which were sampled for BAM analysis (from Table 2 in BAM 2020).

Table 5 tabulates the plot scores for the attributes listed in Table 4 for the plot.

PLOT 1

Life-form	Tree	Shrub	Grass & Grass-like	Forb	Fern	Other
Counts for composition	1	0	1	1	0	0
Counts for cover (%)	28	0	0.01	0.01	0	0

Number large trees (>80cm DBH)	Tree regeneration	Tree stem size classes (cm)					Length fallen logs	Litter cover (%)	Tree Hollows	HTW (%)
		5-9	10-19	20-29	30-49	50-79				
0	absent	no	no	no	no	yes	0	0	0	0

Table 5 - Condition attributes for composition, structure and function in Plot 1

Table 6 summarises the condition attributes for composition, structure and functionality of the biota in the plot which were sampled for BAM analysis, with the resultant Vegetation Integrity Score (VIS) based on the area of 0.0121ha impacted (from Table 2 in BAM 2020). The VIS is used to calculate the offset credits required and the costs incurred for clearing elements of native vegetation representative of PCT 3262 on the subject land.

PLOT 1

ATTRIBUTE	COMPOSITION SCORE	STRUCTURE SCORE	FUNCTION SCORE	VEGETATION INTEGRITY SCORE (VIS)
PCT 3262	**1**	**20.8**	**1.3**	**3**

Table 6 - Condition attribute scores for composition, structure, function and VIS at Plot 1 for PCT 3262.

4 THREATENED SPECIES

4.1 Ecosystem Credit Species

These species are those where the likelihood of occurrence of the species potential elements of the species habitat can reasonably be predicted by vegetation surrogates and features of the landscape, or for which targeted species surveys have a low probability of detection.

The Threatened Biodiversity Data Collection (TBDC) has identified 29 potential ecosystem credit species as predicted by vegetation surrogates and landscape features. These are listed and addressed in Appendix 2.

4.2 Species Credit Species (Candidate Species)

These species are those where the likelihood of occurrence of the species, or potential suitable elements of the species habitat, cannot be reliably predicted by vegetation surrogates and landscape features and can more reliably be detected by species surveys.

The TBDC has identified 9 potential candidate species and these are listed and addressed in Table 7 below.

In accordance with Section 5.3 of BAM (2020) a targeted species survey must be undertaken for a threatened candidate species that is likely to occur at the site based on the application of Steps 1 - 3 in Sub-sections 5.2.1 - 5.2.3 (BAM 2020).

The habitat features for breeding for threatened microchiropterans (such as caves, rocky overhangs and escarpments) are not present on the subject land that is proposed to be impacted. No other cliffs or caves occur within the area proposed for development.

Targeted surveys for Scrub Turpentine (*Rhodamnia rubescens*) and Eastern Australian Underground Orchid (*Rhizanthella slateri*) were undertaken throughout the proposed development site but none were located.

Table 7 - Candidate species assessment table for highly degraded PCT 3262 occurring at 19 - 25 Balfour Street, Lindfield (Duchatel 2023, DCCEEW 2025)

Species name	Common name	Retained	Justification in BAM C if not retained (habitat characteristics - constraints)
Microchiropterans			
Chalinolobus dwyeri	Large-eared pied bat	No	**Habitat constraint:** i.e., absence of caves, crevices in cliffs, old mine workings, disused nests of the Fairy Martin (*Petrochelidon ariel*) which are not available within the subject land.
Miniopterus australis	Little bent-winged bat	No	**Breeding habitat constraint:** i.e., only five nursery sites /maternity colonies are known in Australia Maintained as ecosystem credit species in BAM C. Recorded as foraging in the subject area.
Miniopterus orianae oceanensis	Large bent-winged bat	No	**Breeding habitat constraint:** i.e., maternity caves with specific temperature and humidity regimes. Maintained as ecosystem credit species in BAM C.
Birds			
Anthochaera phrygia	Regent honeyeater	No	**Breeding habitat constraint:** i.e., subject land not within a mapped breeding area for the species (which is only known to breed at three locations). Maintained as ecosystem credit species in BAM C.
Lathamus discolor	Swift parrot	No	**Breeding habitat constraint:** i.e., Subject land is not located on land mapped in BAM as an important area for the species (though immediately adjacent to mapped important areas, however the proposal will not impact on this area) Maintained as ecosystem credit species in BAM C.

Species name	Common name	Retained	Justification in BAM C if not retained (habitat characteristics - constraints)
Flora			
Haloragodendron lucasii		No	**Habitat degraded and unsuitable:** i.e., Managed curtilage
Hibbertia spanatha	Julian's Hibbertia	No	**Habitat degraded:** i.e., Managed curtilage
Rhizanthella slateri	Eastern Australian Underground Orchid	No	**Habitat degraded:** Species not found
Rhodamnia rubescens	Scrub Turpentine	No	**Habitat degraded:** Species not found

4.3 Description of impacts

4.3.1 Direct impacts

4.3.1.1 Removal of vegetation and potential habitat

The direct impacts include the potential removal of an area of approximately 0.0121ha of a long-established, urbanised area with managed gardens and lawns with landscaped exotic species (Figures 7, 8, 9 & 10).

Very few native species occur across the subject properties, including small patches of grasses, forbs and ferns such as Native Violet, Basket Grass and Maidenhair Fern. A sapling of Cabbage Tree Palm, and one of White Cedar were also recorded (Figure 11).

Very little remnant vegetation representing a former distribution of Sydney Turpentine Ironbark Forest (STIF) remains, indicated currently only by the TPZ's of mature trees of Blue Gum and Sydney Red Gum, the root systems of some of which encroach into the subject properties (Figure 3 & 5). However, the development footprint avoids these TPZ's (Figures 3 & 5) and, as such, direct impacts to this former distribution of STIF is minimal.

4.3.1.2 Potential for runoff, sedimentation and erosion during construction

Due to relatively gentle sloping ground surfaces of the subject land, construction activities could potentially lead to some soil erosion and increase in sediment load downslope.

The potential for accidental leaks/spills of oil, fuel, cement or other substances entering the downslope stream channel could potentially pollute ground water and downslope water bodies.

Sediment fences installed along downslope contours from construction activities would serve to reduce potential erosion of land surfaces and decrease the sediment wash downslope during clearing operations.

An approved Construction Environment Management Plan (CEMP) is required to be prepared for the proposal and be provided with the approved application prior to issue of the Construction Certificate to address these potential issues.

4.3.1.3 Potential temporary noise, dust, excessive lighting and vibration disturbance during construction period

The potential effects of temporary but excessive noise, dust, bright lighting and vibration disturbance during construction activities upon potential fauna activity are difficult to predict.

Potential impacts may include negative effects on predator-prey interactions and changes to roosting and breeding behaviours in the short term.

An approved Construction Environment Management Plan (CEMP) is required to be prepared for the proposal and be provided with the approved application prior to issue of the Construction Certificate to address these potential issues.

4.3.2 Indirect Impacts

Indirect impacts occur when the proposal or activities relating to the construction or operation of the proposal may affect adjacent or proximal areas of native vegetation, threatened ecological communities or threatened species habitat beyond the subject site (BAM 2020).

As such, it must be ensured that indirect impacts including the following are adequately constrained or minimised:

a. inadvertent impacts on adjacent habitat or vegetation – adjacent vegetation will not be impacted. The TPZ of neighbouring trees will be avoided and vegetation clearing is limited to within the property boundaries of the subject site;

b. reduced viability of adjacent habitat due to edge effects - edge effects can be minimised by appropriate management including fencing and weed control regimes;

c. reduced viability of adjacent habitat due to noise, dust or light spill - light spill can be minimised by shining lights toward the ground, dust and sediment fences should be used to minimise noise and dust impacts to neighbouring residences;

d. transport of weeds and pathogens from the site to adjacent vegetation - the introduction of pathogens may occur into the site and surrounding remnant bushland, via machinery, tools and equipment and clothing (i.e. boots). Diseases that require caution include Phytophthora (also known as Root Rot – type of water mould) and Myrtle Rust (*Puccinia psidii* – type of fungus). Simple procedures such as minimising entry points to the site and washing down tyres and boots before entry, minimise this risk. Weeds will colonize and pioneer on any cleared grounds, so weed establishment must be managed throughout the duration of the project as well as on-going post works. A vegetation Management Plan has been prepared for the proposal to address the removal and control of any weeds;

e. increased risk of starvation or exposure, and loss of shade or shelter - minimal loss of shelter is considered to occur as a result of the proposal and a vegetation management/landscape plan should be prepared to compensate for any loss of shade/shelter;

f. loss of breeding habitat - minimal loss of breeding habitat is considered to occur as a result of the proposal as there is none considered to be present at the site;

g. trampling of threatened flora species - no threatened flora species would be impacted as these do not occur within the development footprint;

h. fertiliser drift - care must be undertaken when using fertiliser around the building such that nutrient regimes beyond the development area are not compromised, increased nutrient status of soils may encourage weed colonisation at the expense of native species;

i. rubbish dumping - unlikely to occur as the surrounds will be continually inhabited and less opportunity for inadvertent or deliberate rubbish dumping to occur;

j. removal and disturbance of rocks, including bush rock – not applicable at the site;

k. increase in predators - it is requisite that predatory pets such as cats and dogs be kept restrained to avoid predation on native animals; and

l. increase in pest animal populations - pests such as rodents and feral avifauna should be removed and controlled should these opportunistically occur at the development site.

m. hydrological changes - potential indirect impacts to flora and fauna would include hydrological changes to the surface water-runoff flow. Any additional hard surface areas created as a result of the proposed construction would be expected to potentially result in some changes to the current hydrological regime. However, it would be proposed that all water run-off would be directed within the property to the current urban stormwater management system.

4.3.3 Prescribed and uncertain impacts

Prescribed impacts on biodiversity values includes any potential impacts that are not a result of direct vegetation clearing or construction development that have been prescribed by the Biodiversity Conservation Regulation (2017), these listed in Table 8 as follows:

Attributes or features of the habitat	Potential impacts	Actions to alleviate or ameliorate potential impacts
Species using caves, cliffs, karsts or crevices. Includes potential roosting sites for cave-dwelling microchiropterans	There are no caves, cliffs, karsts or crevices on or near the subject site.	N/A
Habitat of threatened species associated with rocks	There are no rocks in the subject site	N/A
Habitat of threatened species associated with man-made structures such as drainage pipes and earth dams	Some species of microchiropterans are known to roost in the eaves of buildings. None were observed at the subject site but have been recorded in the area.	Recommend removing building roofs sequentially in the evenings to allow bats to disperse prior to demolition.

Habitat of threatened species associated with non-native vegetation	Non-native vegetation will be removed as part of the development proposal.	No habitat for threatened species currently occurs at the subject site, however, revegetation of native species representative of STIF in any landscape plan may afford foraging and sheltering resources to avifauna
Connectivity of habitats within and between allotments facilitating movement of species across their range	Connectivity is not considered to be reduced by the proposal due to similar and better vegetation in surrounding properties	Revegetation of native species representative of STIF in any landscape plan may afford some degree of connectivity in the local area
Movement of threatened species required to maintain life cycles	No living canopy trees will be removed and no hollows exist in dead/dying trees to be removed so it is considered that the proposal will not further contribute to the decline in maintenance of life cycles, particularly with regard to avian fauna.	The proposal is unlikely to cause decline in maintenance of life cycles, particularly with regard to highly mobile avian and microchiropteran fauna
Hydrological regimes required to sustain threatened species	Not applicable.	N/A

Table 8 - List of potential prescribed impacts which may occur as a result of the proposed development.

4.3.4 Serious and Irreversible Impacts (SAIIs)

Species and ecological communities with a 'very high' biodiversity risk weighting are considered to be a potential serious and irreversible impact (SAII). These 'potential SAII entities' are identified by the BAM calculator (BAM 2020).

The determination of serious and irreversible impacts on biodiversity values is to be made by the consent authority in accordance with the principles set out in the BC Regulation. To assist the consent authority, the guidance document 'Guidance to Assist a Decision Maker to determine a serious and irreversible impact' includes criteria that enable the application of the four principles set out in clause 6.7 of the BC Regulation. These criteria provide a guide to identify the species and ecological communities that are likely to be the subject of serious and irreversible impacts.

These four principles include the following (BC Regulation 2018):

An impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of a threatened species or ecological community becoming extinct because:

> (a) it will cause a further decline of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to be in a rapid rate of decline, or
>
> (b) it will further reduce the population size of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to have a very small population size, or
>
> (c) it is an impact on the habitat of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to have a very limited geographic distribution, or
>
> (d) the impacted species or ecological community is unlikely to respond to measures to improve its habitat and vegetation integrity and therefore its members are not replaceable.

For the purpose of this clause, a decline of a species or ecological community is a continuing or projected decline in:

> (a) an index of abundance appropriate to the taxon, or
>
> (b) the geographic distribution and habitat quality of the species or ecological community.

The Sydney Turpentine Ironbark Forest in the Sydney Basin Bioregion Ecological Community is listed as serious and irreversible impact (SAII) entity in the *Guidance to Assist a Decision Maker to determine a Serious and Irreversible Impact* based on principles 1 and 2.

The clearing of the current vegetation assemblage that occurs at 19 - 25 Balfour Street, Lindfield, will have no effect on the present extent of STIF in the Sydney Basin Bioregion as the vegetation occurs in a highly floristically and structurally modified condition at the subject site with very few indicative species of the community present in the assemblage (Figures 7, 8, 9 & 10).

Nevertheless, details of the assessment of this SAII in accordance with the criteria set out in Subsection 9.1.1 of BAM 2020 is provided in Table 9.

4.3.4.1 Sydney Turpentine Ironbark Forest in the Sydney Basin Bioregion

Table 9: Additional Impact Assessment to assist the determination of Serious and Irreversible Impacts on the Sydney Turpentine Ironbark Forest in the Sydney Basin Bioregion Ecological Community

CRITERIA	SAII ASSESSMENT INFORMATION
The action and measures taken to avoid the direct and indirect impact on the TEC at risk of an SAII. Where these have been addressed elsewhere the assessor can refer to the relevant sections of the BDAR and BCAR.	Refer section 4.4 where the location of the development proposal has been designed in such a way that limits the clearing of mature canopy species.
Current status of the TEC	
Evidence of reduction in geographic distribution (Principle 1, clause 6.7(2)(a) BC Regulation) as the current total geographic extent of the TEC in NSW AND the estimated reduction in geographic extent of the TEC since 1970 (not including impacts of the proposal)	The estimated reduction in geographic extent of the TEC since 1970 is unknown, however a national study by NPWS in 1997 estimate that approximately 1181.5ha remained out of a pre-1970 estimate of 30,124.9ha (DCCEEW SPRAT 2025). The current extent is estimated to be 1038ha (Bionet 2025), which is a reduction of 12%. Pre-European (1750) extent is estimated to be 25348ha, which is an overall reduction of 95.91%. Within the Ku-ring-gai LGA, approximately 5.5% of the original (pre-1750) 1246.3ha remained extant as of 1997 (NPWS 2002). The current distribution is restricted to the Sydney Basin Bioregion, and is largely associated with the rim of the Cumberland Plain and lower Blue Mountains, with outlier remnant patches in approximately 21 LGAs, being AUBURN, BANKSTOWN, BAULKHAM HILLS, BLUE MOUNTAINS, CAMPBELLTOWN, CANADA BAY, CANTERBURY, CONCORD, HAWKESBURY, HORNSBY, KOGARAH, KU-RING-GAI, LANE COVE, LIVERPOOL, PARRAMATTA, PENRITH, RYDE, SUTHERLAND, WINGECARRIBEE, WOLLONGONG and WOLLONDILLY.

Extent of reduction in ecological function for the TEC using evidence that describes the degree of environmental degradation or disruption to biotic processes (Principle 2, clause 6.7(2)(b) BC Regulation) indicated by: i. change in community structure ii. change in species composition iii. disruption of ecological processes iv. invasion and establishment of exotic species v. degradation of habitat, and vi. fragmentation of habitat	The location of the development proposal has been designed so as to re-use the existing building footprints and remove mostly exotic vegetation and limit clearing of extant native vegetation. In many of the remaining patches of the TEC, only remnant trees remain. The native trees representative of the TEC at the subject site exist in a landscaped environment so will not contribute to the long-term persistence of the community at the site. However, with post construction landscaping using representative species of this community at each structural level, it is considered that there will be minimal change to the existing structure, composition and ecological function of the community. A Vegetation Management Plan/Landscape Plan has been prepared to ensure the composition and structure of the TEC can be restored as much as possible. Regarding invasion and establishment of exotic species, there is already a high abundance of exotic ground cover, mainly from planted ornamentals. A Vegetation Plan of Management has been prepared which includes a monitoring program to ensure exotic weed species that may re-colonise are periodically removed and disposed of in a licensed disposal facility. Regarding degradation of habitat, landscaping to restore habitat features such as rocks and using suitable representative species are outlined in the Vegetation Management Plan. Regarding fragmentation of habitat, the development proposal has been designed such all (live) mature canopy trees will be retained so that further fragmentation of habitat within the surrounds would not likely occur.
Evidence of restricted geographic distribution (Principle 3, clause 6.7(2)(c) BC Regulation), based on the TEC's geographic range in NSW according to the: i. extent of occurrence ii. area of occupancy, and iii. number of threat-defined locations	Evidence of restricted geographic distribution based on the TEC's geographic range in NSW according to the i. extent of occurrence – The estimated total extent of the TEC listed under the *Environmental Protection and Biodiversity Conservation Act 1999* (Commonwealth) that remained in 2005 was 2495 ha, and the current extent is estimated to be approximately 1038ha (Bionet 2025). It is predominantly associated with the rim of the Cumberland Plain and lower Blue Mountains, including the eastern side of the northern Hornsby Plateau and on the

Woronora Plateau (Benson & Howell 1990). Outliner remnants remain in 21 of an estimated previous 25 LGAs.

ii. area of occupancy – the most recent estimate of the area of occupancy is approximately 1038 ha, with only a small percentage of this included in conservation reserves.

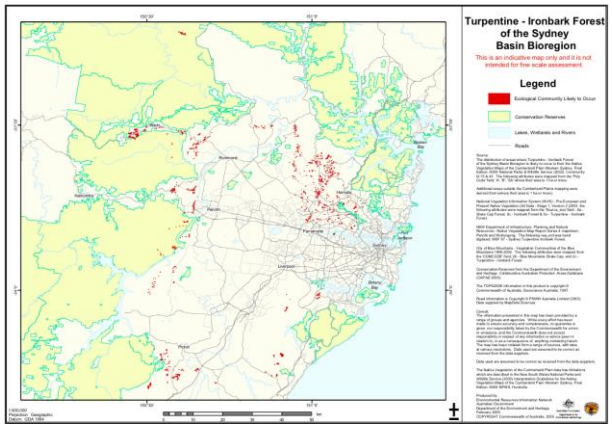
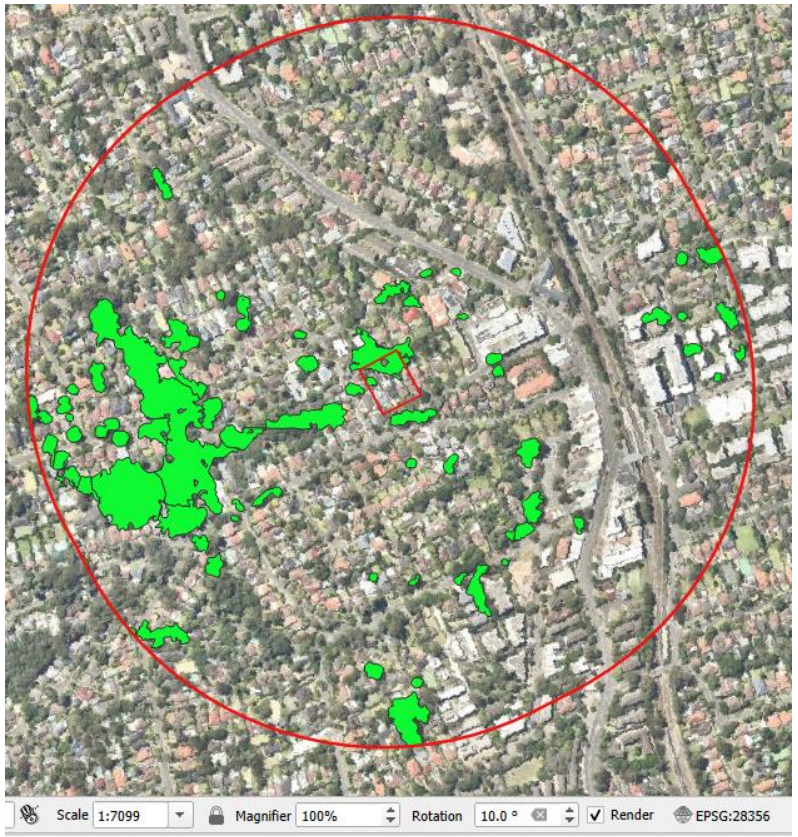


Figure 18: Current estimated distribution of Turpentine-Ironbark Forest in NSW

iii. number of threat locations – the exact number of threat locations appears unknown, however recent mapping of the community indicates that it remains in patches in 21 LGAs: AUBURN, BANKSTOWN, BAULKHAM HILLS, BLUE MOUNTAINS, CAMPBELLTOWN, CANADA BAY, CANTERBURY, CONCORD, HAWKESBURY, HORNSBY, KOGARAH, KU-RING-GAI, LANE COVE, LIVERPOOL, PARRAMATTA, PENRITH, RYDE, SUTHERLAND, WINGECARRIBEE, WOLLONGONG and WOLLONDILLY.

Other remnants that are not part of the listed community are reported to occur in Ashfield, Drummoyne, Hunters Hill, Leichhardt, Marrickville and Rockdale LGAs (DCCEEW 2025).

Evidence that the TEC is unlikely to respond to management (Principle 4, clause 6.7(2)(d) BC Regulation).	As of 2021, a recovery plan is being prepared by the NSW Department of Environment and Heritage, however suggested priority recovery actions include prevention of further clearing, weed management, fencing of important remnants and vegetation rehabilitation. The TEC at the subject site would likely respond to vegetation rehabilitation and weed management through a Vegetation Management Plan.
Impacts of the Proposal	
The impact on the geographic extent of the TEC (Principles 1 and 3) by estimating the total area of the TEC to be impacted by the proposal: i. in hectares, and ii. as a percentage of the current geographic extent of the TEC in NSW. Data and information should include direct impacts (i.e. from clearing) and indirect impacts where partial loss of the TEC is likely as a result of the proposal. The assessor should consider for example, changes to fire regime (frequency, severity), hydrology, pollutants, species interactions (increased competition, changes to pollinators or dispersal), fragmentation, increased edge effects and disease, pathogens and parasites, which are likely to contribute to the loss of flora	The area of native vegetation that will be impacted by the proposal includes clearing of vegetation for the new building. It is not considered that there will be changes to hydrology, fire regimes, pathogens, parasites, edge effects and fragmentation of the PCT in undeveloped sections of the property as a result of the proposal as the direct and indirect impacts are restricted to an area of 0.0121ha. i. It is estimated that a total area of 0.0121ha of native vegetation will be impacted by the proposal. ii. This equates to 0.001166% of the current geographic extent of the TEC in NSW (1038ha).

and/or fauna species characteristic of the TEC	
The extent that the proposed impacts are likely to contribute to further environmental degradation or the disruption of biotic processes (Principle 2) of the TEC by: i. estimating the size of any remaining, but now isolated, areas of the TEC; including areas of the TEC within 500 m of the development footprint or equivalent area for other types of proposals ii. describing the impacts on connectivity and fragmentation of the remaining areas of TEC measured by: • distance between isolated areas of the TEC, presented as the average distance if the remnant is retained AND the average distance if the remnant is removed as proposed, and • estimated maximum dispersal distance for native flora species characteristic of the TEC, and • other information relevant to describing the impact on connectivity and fragmentation, such as the area to perimeter	i. It is estimated that the size of the remaining TEC within 500m of the development footprint is 7.63ha (Drevon GIS 2025) (Figure 19), however this figure does not allow for the intergrades between Sydney Blue Gum High Forest (PCT 3136), which could cause this figure to fluctuate slightly up or down.  *Figure 19: Estimated remaining Sydney Turpentine Ironbark Forest (green) within 500m of the subject site (red outline)* ii. the small area of the proposed development occurs in an extensively landscaped and urbanised form of the ecological community, with similar urbanised areas

<table>
<tr>
<td>ratio for remaining areas of the TEC as a result of the development

iii. describing the condition of the TEC according to the vegetation integrity score for the relevant vegetation zone(s) (Section 4.3). The assessor must also include the relevant composition, structure and function condition scores for each vegetation zone.</td>
<td>surrounding the development such that there would be minimal loss of potential connectivity across the distribution of the PCT within the property and the locality as a whole. The native trees could potentially disperse pollen and seed to other areas within the LGA and the trees to be retained can continue to provide this function. Dispersal studies suggest that eucalypt pollen regularly travels distances of over 1km, although most is distributed within 200m (Booth 2017).

iii. the VI Score of the subject land is only 3% with a low composition score of 1% and a function score of 1.3%. This represents an area of the TEC in a highly urbanized and landscaped condition but with high percent cover of remnant trees within the plot.
The Vegetation Integrity Scores for the TEC at the subject site are as follows:
<table>
<tr><th>Composition</th><th>Structure</th><th>Function</th><th>Total VI</th></tr>
<tr><td>1</td><td>20.8</td><td>1.3</td><td>3</td></tr>
</table>
</td>
</tr>
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4.4 Avoidance/minimisation of impacts

The major canopy elements of PCT 3262 – Sydney Turpentine Ironbark Forest (STIF) (DCCEEW 2025) occur in neighbouring allotments, with some TPZ's encroaching into the subject site (Figures 3 & 5). However, the development footprint avoids these root systems and these trees will not be impacted. Development of this site is avoiding the development of other sites that may have higher biodiversity values.

After consultation with the Architects and Arborist, the plans were redesigned in February 2026 so that Trees 3, 39 and 42 that were initially marked for removal will be now be retained, and encroachments on several other trees was minimised.

Figure 20 shows three different architectural design options that were considered for the building. After consideration of avoidance and minimisation to biodiversity values, Option 3 was chosen over Option 2 to minimise encroachment on the trees to the rear of the site.

Figure 21 shows the evolution of the site plans on the Arborist Tree Management Plan, demonstrating the changes that led to the retention of Trees 3, 39 and 42.

Avoidance measures have been put in place such that:

- The boundary wall and booster have been relocated away from the trunk of Tree 3
- The landing has been adjusted to achieve a TPZ encroachment of less than 10% on Tree 42.
- The footpath has been realigned to reduce encroachment on Tree 23
- Relocation of Tree 39 in the Landscape Plan
- Podium levels that were originally at the rear of the site (Option 2 in Figure 20) were relocated to the south, allowing an increased building setback at the rear to minimise incursion into the TPZ of Tree 56

In order to further minimise the environmental impact of the proposed development, it is recommended to use up to 80% of species representative of Sydney Turpentine Ironbark Forest in any landscaping that is associated with the proposed development. Species representative of STIF can be found in Appendix 4.

A Vegetation Management Plan has been prepared for the proposal which details management actions to protect any retained trees occurring adjacent to the construction footprint, as well as a weeding program to remove any invasive weeds from the property prior to and following potential construction.

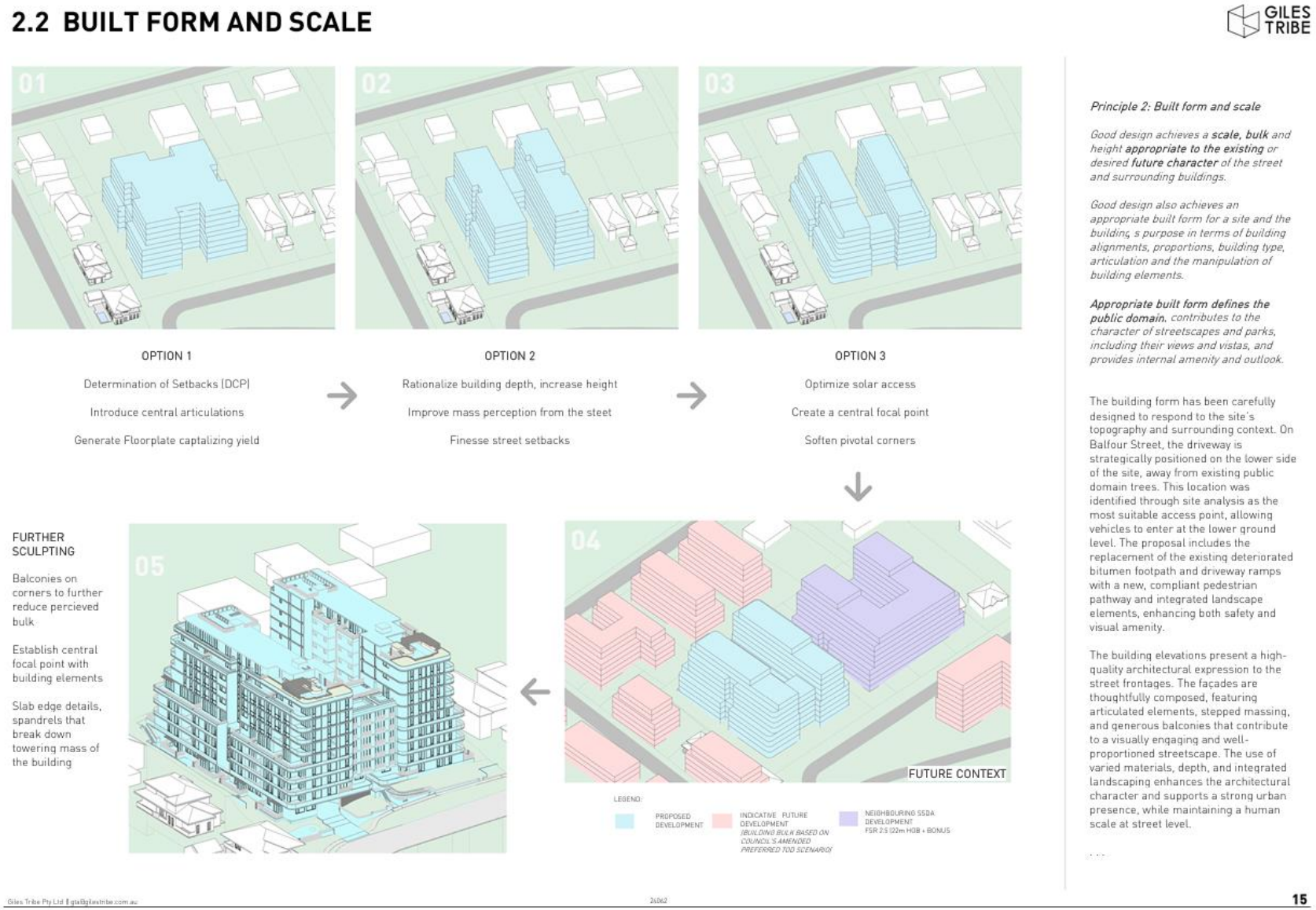

Figure 20: Extract from Architecture Design Report showing the 3 design options that were considered for the proposal. Option 3 was chosen after consideration of avoidance of impacts to Biodiversity Values. (Giles & Tribe 2026)

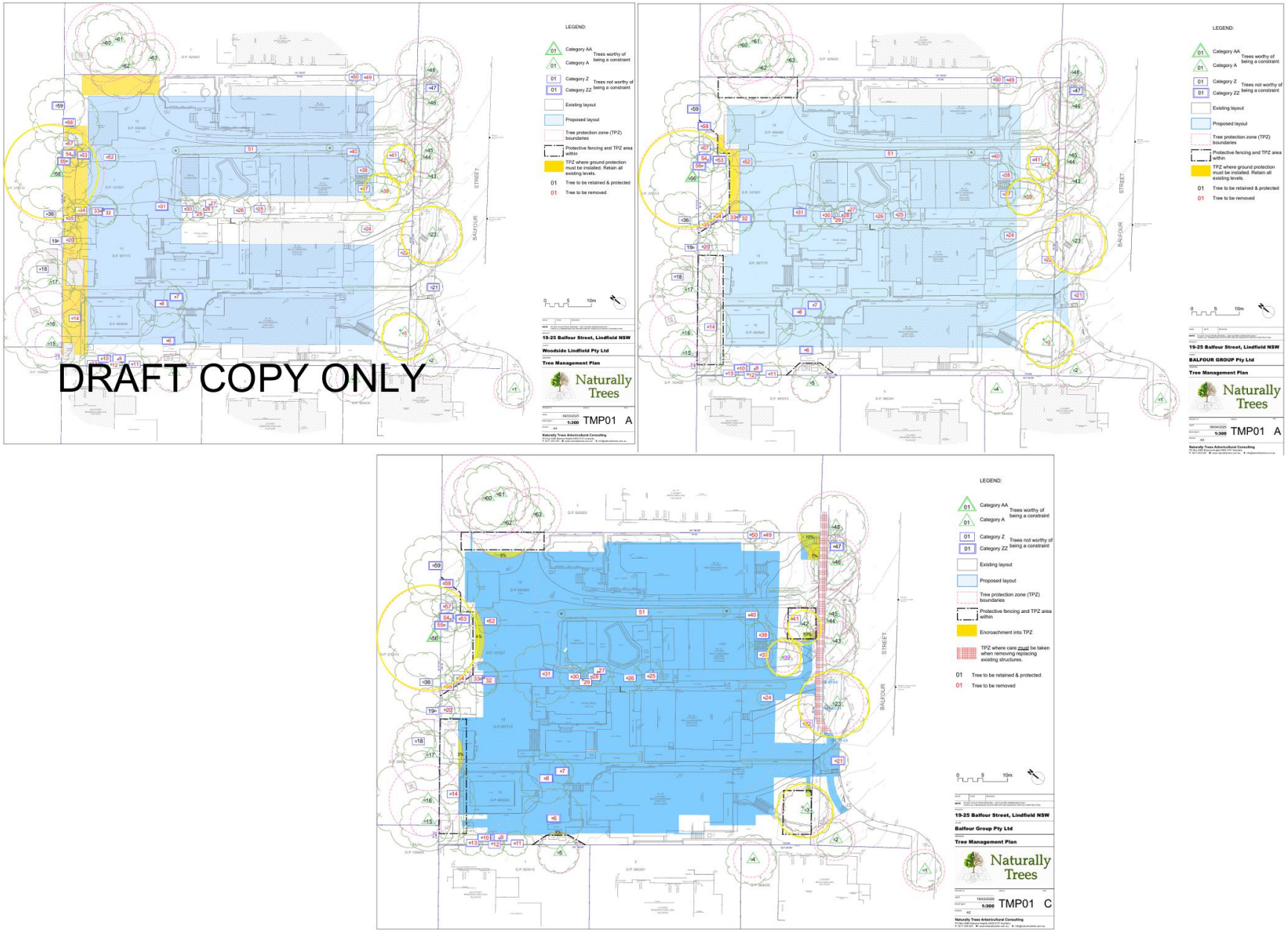

Figure 21: Evolution of the plans to avoid removal of Trees 3, 39 and 42, and to increase setbacks to minimise incursion into the TPZ of Tree 56 and footpath realigned to reduce encroachment on Tree 23 (trees circled in yellow) (Naturally Trees 2025 & 2026).

4.5 Mitigation measures

4.5.1 Wildlife corridor/ revegetation

Native tree replanting commensurate with Sydney Turpentine Ironbark Forest assemblages will restore the long-term retention of canopy.

Species plantings in any landscape plan should include locally native species representative of Sydney Turpentine Ironbark Forest assemblages. This will provide greater foraging and nesting habitat for native species and will deliver greater biodiversity gain outcomes than currently occur at the subject site. The greatest ecological outcome is to recreate areas of Sydney Turpentine Ironbark Forest community where environmental criteria are favourable including trees, shrubs, native grasses and forbs.

4.5.2 Retaining mature trees at subject site

There are no mature individuals of canopy trees belonging to the Sydney Turpentine Ironbark Forest plant community occurring within the subject construction site.

Species plantings in any landscape plan should include locally native species representative of Sydney Turpentine Ironbark Forest assemblages as this would act to reduce the minimal environmental impact of the proposed development.

5 IMPACT SUMMARY AND CONCLUSIONS

5.1 Impacts that require an Offset

The vegetation community mapped by DCCEEW (2025) as occurring at the northern sections of the 4 properties (DCCEEW 2025) was based on previous occurrences of component tree species, of which none are retained at the subject site.

Sydney Turpentine Ironbark Forest in the Sydney Basin Bioregion, is listed as a Critically Endangered Ecological Community on registers of the BC Act (2016). A former remnant forest vegetation occurs in a highly degraded, floristically, structurally and functionally modified condition with very few representative species recorded as occurring in the assemblage (Appendix 1) (Figures 7, 8, 9 & 10).

This assessment (prepared using the BAM-C Offsets Calculator) has determined that for the potential clearing of 0.0121ha in area of some indicative species in a stand of former STIF, the Vegetation Integrity Score is three (3), and no ecosystem credits are required to offset impacts to the removal of 0.0121ha of the highly modified vegetation of this subject site.

Table 10 summarises the impact to areas of PCT 3262 that require an offset.

Vegetation Zone (Description)	PCT	Extent of potential area impacted	Current Vegetation Integrity Score (VIS)	Future Vegetation Integrity Score	Number of Ecosystem credits required
Highly floristically, structurally and functionally modified assemblage of plants at the subject site (mostly ornamental landscapings) with very few representative plant species of STIF present in the composition (Figures 7, 8, 9, 10 & 11)	**3262**	**0.0121ha**	**3**	**0**	**0**

Table 10 – Potential impact to PCT Areas

5.3 Conclusions of assessment

The proposed development is sited on land that has been historically cleared since well before 1943 (DCCEEW 2025), is highly degraded in relation to remnant native species, the vegetation composition of managed gardens and lawns dominated by exotic species landscaping (Figures 7, 8, 9, 10 & 11).

The vegetation structure is varied and consists of some dead/dying canopy trees, shrubs and ground cover plants that provide some shelter and foraging resources for avifauna, arboreal and ground dwelling mammals and reptiles.

No area of significant biodiversity value will be impacted by the proposal as the construction footprint avoids all TPZ's of neighbouring canopy trees (Figures 3 & 5).

A total of 7 indigenous flora species will be impacted by the development, however their current abundance and cover is very low, and only a few of these are representative of the currently mapped Plant Community Type Sydney Turpentine Ironbark Forest (PCTID 3262), a critically endangered ecological community under the BC Act (2016) and the EPBC Act (1999).

Several native trees that were representative of the PCT are dead, so it is considered that the vegetation at the subject site is no longer a true representation of the Sydney Turpentine Ironbark Forest Plant Community.

The retention of the individual of Lilly Pilly along the Council verge along Balfour Street and the root systems of trees in the adjacent properties at 17 Balfour Street and 18 and 14 Highfield Road, Lindfield (Figure 5, Naturally Trees 2025) avoids impact to significant elements of biodiversity value at the subject site.

Bionet (2025) returned 15 potential flora species of conservation significance that have been recorded within 5km of the subject site within the last 20 years, however a targeted search for these did not locate any of these individuals.

Seven High Threat Weed species was recorded at the site.

Bionet (2025) returned 34 potential fauna species conservation significance that have been recorded within 5km of the subject site within the last 20 years. Two of these (microchiropterans) were potentially recorded foraging on the site, however a definite identification could not be obtained due to the quality of the bat call.

Bandicoot diggings were found in adjacent properties but not in the any at the subject site.

The subject site has been mapped as having significant biodiversity value by the Biodiversity Conservation Regulation based on the mapping as a threatened ecological community. This triggers the Biodiversity Offsets Scheme (BOS), However, ground truthing by ACS has concluded that the subject site is no longer representative of PCT 3262.

It is considered that no threatened entities will be impacted by the proposal.

Species plantings in any landscape plan should include locally native species representative of Sydney Turpentine Ironbark Forest assemblages. This will provide greater foraging and nesting

habitat for common native species and will deliver greater biodiversity gain outcomes than currently occur at the subject site. The greatest ecological outcome is to recreate areas of Sydney Turpentine Ironbark Forest community where environmental criteria are favourable including trees, shrubs, native grasses and forbs.

6 BIODIVERSITY CREDIT REPORT (LIKE FOR LIKE)

For the proposed Transit-Orientated Development at 19 - 25 Balfour Street, Lindfield, an area of 0.0121ha of plant species indicative of the STIF ecological community in a highly degraded condition, is proposed to be cleared.

The vegetation is assessed as having a very low floristic, low structural and very low functional integrity in the canopy tree, shrub and ground strata.

There is very low composition of natural species in the assemblage, a very low spread of tree DBH sizes with no regeneration occurring.

The Biodiversity Credit Report for the proposal is as follows:

BAM Biodiversity Credit Report (Like for like)

Proposal Details

Assessment Id 00057567/BAAS24033/26/00065308	Proposal Name 19-25 Balfour St Lindfield	BAM data last updated * 05/08/2025
Assessor Name Josie Drevon	Assessor Number BAAS24033	BAM Data version * Current classification (live - default) (82)
Proponent Names Aries Xu	Report Created 25/03/2026	BAM Case Status Finalised
Assessment Revision 0	BOS entry trigger BOS Threshold: Biodiversity Values Map	Assessment Type Part 4 Developments (Small Area)
Date Finalised 25/03/2026	* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.	

Potential Serious and Irreversible Impacts

Name of threatened ecological community	Listing status	Name of Plant Community Type/ID
Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion	Critically Endangered Ecological Community	3262-Sydney Turpentine Ironbark Forest

Species
Nil

BAM Biodiversity Credit Report (Like for like)

Additional Information for Approval

PCT Outside Ibra Added

None added

PCTs With Customized Benchmarks

PCT
No Changes

Predicted Threatened Species Not On Site

Name
Calyptorhynchus lathami lathami / South-eastern Glossy Black-Cockatoo
Ephippiorhynchus asiaticus / Black-necked Stork
Grantiella picta / Painted Honeyeater
Ixobrychus flavicollis / Black Bittern
Haliaeetus leucogaster / White-bellied Sea-Eagle
Pycnoptilus floccosus / Pilotbird

Ecosystem Credit Summary (Number and class of biodiversity credits to be retired)

No Ecosystem Credit Data

BAM Biodiversity Credit Report (Like for like)

Species Credit Summary

No Species Credit Data

Credit Retirement Options

Like-for-like credit retirement options

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Appendix 1 - Species occurrence at 19 - 25 Balfour Street, Lindfield

KEY

Status

pl – planted in landscape

* - exotic

HTW - High Threat Weed

Relative presence ranking within range of properties

* - uncommon or occasional

** - relatively common

*** - common or abundant

STATUS	SCIENTIFIC NAME	COMMON NAME	ON COUNCIL VERGES	IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	IN ADJOINING PROPERTIES
	FILICOPSIDA				
	Davalliaceae				
*	*Nephrolepis cordifolia*	Fishbone Fern		**	
	Dicksoniaceae				
	Calochlaena dubia	Soft Bracken		*	
	Polypodiaceae				
pl	*Platycerium bifurcatum*	Elkhorn		*	
	Pteridaceae				
	Adiantum aethiopicum	Common Maidenhair		*	
	Adiantum hispidulum	Rough Maidenhair			**
	GYMNOSPERMAE: CONIFERALES				
	Cupressaceae				
*pl	*Cupressus sp.*	Cypress Pine		**	
*pl	*Cupressus sempervirens*	Italian Cypress		*	
*pl	*Cupressocyparis leylandii*	Leyland Cypress		*	

STATUS	SCIENTIFIC NAME	COMMON NAME	ON COUNCIL VERGES	IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	IN ADJOINING PROPERTIES
	Zamiaceae				
pl	*Macrozamia communis*	Burrawang		*	
	MAGNOLIOPSIDA: MAGNOLIDAE				
	Araliaceae				
*	*Hedera helix*	English Ivy		*	
	Asteraceae				
*	*Conyza bonariensis*	Flaxleaf Fleabane		**	
	Begoniaceae				
*pl	*Begonia sp.*	Begonia		***	
	Berberidaceae				
*pl	*Nandina domestica*	Sacred Bamboo		*	
	Betulaceae				
*pl	*Betula nigra*	River Birch		*	
	Bignoniaceae				
*pl	*Jacaranda mimosifolia*	Jacaranda	***	*	
	Bromeliaceae				
*pl	*Neoregelia carolinae*	Neoregelia		*	
	Buxaceae				
*pl	*Buxus microphylla*	Buxus		***	
	Cannabaceae				
*pl	*Celtis sinensis*	Hackberry			***
	Caprifoliaceae				
*pl	*Abelia chinensis*	Abelia		*	
	Casuarinaceae				
pl	*Casuarina cunninghamiana*	River Oak			*
	Crassulaceae				
*pl	*Aeonium sp*	Tree houseleek		*	

STATUS	SCIENTIFIC NAME	COMMON NAME	ON COUNCIL VERGES	IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	IN ADJOINING PROPERTIES
	Fagaceae				
*pl	*Quercus robur*	English Oak	*		*
	Hydrangeaceae				
*pl	*Hydrangea macrophylla*	Garden Hydrangea		***	
	Lamiaceae				
*	*Plectranthus ciliata*			*	
	Lythraceae				
*pl	*Lagerstroemia indica*	Crepe Myrtle		*	
	Magnoliaceae				
*pl	*Magnolia grandiflora*	Southern Magnolia		***	
*pl	*Magnolia soulangeana*	Magnolia		*	
	Meliaceae				
	Melia azederarch	White Cedar		*	
	Melastomataceae				
*pl	*Pleroma urvilleanum*	Tibouchina		*	
	Moraceae				
*pl	*Ficus pumila*	Creeping Fig		**	
	Myrtaceae				
	Acmena smithii	Lilly Pilly	*		
	Angophora costata	Sydney Red Gum			*
pl	*Callistemon citrinus*	Lemon-scented Bottlebrush		* (hedge)	
	Callistemon salignus	Sweet-willow Bottlebrush			*
	Corymbia maculata	Spotted Gum			*
	Eucalyptus saligna X E. botryoides#	Sydney Bluegum X Coastal Mahogany			***
	Eucalyptus sp.	Eucalypt		*	
pl	*Leptospermum petersonii*	Lemon-scented Teatree		*	*

STATUS	SCIENTIFIC NAME	COMMON NAME	ON COUNCIL VERGES	IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	IN ADJOINING PROPERTIES
	Oleaceae				
*pl	*Jasminum mesneyi*	Primrose Jasmine		*	
*	*Trachelospermum asiaticum*	Star Jasmine		*	
	Oxalidaceae				
*	*Oxalis corniculata*	Oxalis		*	
	Proteaceae				
pl	*Macadamia tetraphylla*	Macadamia Nut			*
	Rhamnaceae				
	Alphitonia excelsa	Red Ash	**		
	Rosaceae				
*pl	*Eriobotrya japonica*	Loquat		*	
*pl	*Pyurus calleryana*	Callery Pear		*	
	Rubiaceae				
*pl	*Gardenia florida*	Gardenia		**	
	Rutaceae				
*pl	*Murraya paniculata*	Orange Jessamine		***	
	Sapindaceae				
*pl	*Acer buergerianum*	Trident Maple		*	
*pl	*Acer negundo*	Box Elder	*		
*pl	*Acer palmatum*	Japanese Maple		**	
	Solanaceae				
*	*Solanum mauritianum*	Tobacco Bush		*	
*	*Solanum nigrum*	Black Nightshade		*	
	Theaceae				
*pl	*Camellia sasanqua*	Camellia		**	
*pl	*Gordonia axillaris*	Fried Egg Plant		*	

STATUS	SCIENTIFIC NAME	COMMON NAME	ON COUNCIL VERGES	IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	IN ADJOINING PROPERTIES
	Violaceae				
	Viola hederacea f. F	Ivy-leaved Violet		*	
*	*Viola odorata*	Sweet Violet		*	
	MAGNOLOPSIDA: LILIDAE				
	Agavaceae				
*pl	*Yucca brevifolia*	Joshua Tree		*	
	Amaryllidaceae				
*	*Clivia miniata*	Clivia		**	
	Araceae				
*	*Colocasia esculenta*	Taro		*	
*	*Monstera deliciosa*	Fruit Salad Plant			*
*	*Philodendron xanadu*	Philodendron xanadu		*	
	Arecaceae				
*pl	*Archontophoenix alexandrae*	Northern Bangalow Palm		**	
*pl	*Howea forsteriana*	Kentia Palm		**	
	Livistona australis	Cabbage Tree Palm		**	
*pl	*Rhaphis excelsa*	Broad-leaved Lady Palm		***	
*pl	*Syagruf romanzoffianum*	Queen Palm		**	
	Asparagaceae				
HTW	*Asparagus aethiopicus*	Ground Asparagus Fern		*	
	Cannaceae				
*	*Canna indica*	Indian Shot Plant		*	
	Commelinaceae				
HTW	*Tradescantia fluminensis*	Wandering Jew		*	
	Cyperaceae				
*	*Cyperus eragrostis*	Umbrella Sedge		*	

STATUS	SCIENTIFIC NAME	COMMON NAME	ON COUNCIL VERGES	IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	IN ADJOINING PROPERTIES
	Doryanthaceae				
pl	*Doryanthes excelsa*	Gymea Lily			*
	Iridaceae				
*	*Agapanthus praecox*	Agapanthus		***	***
*	*Crocosmia x crocosmiiflora*	Montbretia		*	
*	*Dietes bicolor*	Fortnight Lily		**	
	Poaceae				
HTW	*Cenchrus clandestinus*	Kikuyu		***	***
HTW	*Cenchrus setaceous*	Fountain Grass		*	
HTW	*Ehrharta erecta*	African Veldt Grass		**	
*pl	*Ophiopogon japonicus*	Mondo Grass		*	
	Oplismenus aemulus	Basket Grass		*	**
HTW	*Phyllostachys nigra*	Black Bamboo		*	
*	*Stenotaphrum secundatum*	Buffalo Grass		***	
	Strelitzaceae				
*pl	*Strelitzia nicolai*	Wild Banana		**	
*pl	*Strelitzia reginae*	Crane Flower		*	
	Zingiberaceae				
pl	*Alpinia caerulea*	Native Ginger		*	
*	*Hedychium gardneranum*	Wild Ginger			*

Appendix 2 - BAAS Profile for J Drevon

Department of Climate Change, Energy, the Environment and Water

NSW GOVERNMENT

CERTIFICATE OF ACCREDITATION AS A BIODIVERSITY ASSESSMENT METHOD ASSESSOR under the *Biodiversity Conservation Act 2016* (NSW)

BAM Assessor		
Josie Drevon		
Accreditation number	**Accreditation date (Date of issue)**	**Expiry Date of**
BAAS24033	September 26, 2024	September 25, 2027

The person named above is accredited under section 6.10 of the *Biodiversity Conservation Act 2016* (NSW) (**BC Act**) as a Biodiversity Assessment Method Assessor to apply the Biodiversity Assessment Method in connection with the preparation of biodiversity stewardship site assessment reports, biodiversity development assessment reports and biodiversity certification assessment reports pursuant to Part 6 of the BC Act.

The accreditation is in force until and including the Expiry Date. The accreditation is subject to the conditions set out in the *Accreditation Scheme for the Application of the Biodiversity Assessment Method*, under the BC Act, and the conditions specified on the reverse of this certificate.

STEEN GYRN

Senior Team Leader, Accreditation and Training
Biodiversity and Conservation Division | Department of Climate Change, Energy, the Environment and Water

NOTES

- DCCEEW maintains a register of Accredited Biodiversity Assessment Method (BAM) Assessors accessible from the DCCEEW website.
- The BAM Assessor's accreditation expires on the Expiry Date unless renewed in accordance with the *Accreditation Scheme for the Application of the Biodiversity Assessment Method*. It is the BAM Assessor's responsibility to monitor the Expiry Date of their accreditation, and apply for any renewal with sufficient time for the application to be processed prior to the Expiry Date.
- Words and expressions used in this accreditation instrument and which are also used in the Act have the same meaning.

Appendix 3 - BAM Summary Reports

NSW GOVERNMENT

BAM Credit Summary Report

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00057567/BAAS24033/26/00065308	19-25 Balfour St Lindfield	05/08/2025
Assessor Name	Report Created	BAM Data version *
Josie Drevon	25/03/2026	Current classification (live - default) (82)
Assessor Number	BAM Case Status	Date Finalised
BAAS24033	Finalised	25/03/2026
Assessment Revision	BOS entry trigger	Assessment Type
0	BOS Threshold: Biodiversity Values Map	Part 4 Developments (Small Area)

* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

Ecosystem credits for plant communities types (PCT), ecological communities & threatened species habitat

Zone	Vegetation zone name	TEC name	Current Vegetation integrity score	Change in Vegetation integrity (loss / gain)	Area (ha)	Sensitivity to loss (Justification)	Species sensitivity to gain class	BC Act Listing status	EPBC Act listing status	Biodiversity risk weighting	Potential SAII	Ecosystem credits

BAM Credit Summary Report

Sydney Turpentine Ironbark Forest												
1	3262_Urbanised	Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion	3	3.0	0.01	Population size	High Sensitivity to Gain	Critically Endangered Ecological Community	Not Listed	2.50	True	0
											Subtotal	**0**
											Total	**0**

Species credits for threatened species

Vegetation zone name	Habitat condition (Vegetation Integrity)	Change in habitat condition	Area (ha)/Count (no. individuals)	Sensitivity to loss (Justification)	Sensitivity to gain (Justification)	BC Act Listing status	EPBC Act listing status	Potential SAII	Species credits

BAM Candidate Species Report

Proposal Details

Assessment Id 00057567/BAAS24033/26/00065308	Proposal Name 19-25 Balfour St Lindfield	BAM data last updated * 05/08/2025
Assessor Name Josie Drevon	Report Created 25/03/2026	BAM Data version * Current classification (live - default) (82)
Assessor Number BAAS24033	Assessment Type Part 4 Developments (Small Area)	BAM Case Status Finalised
Assessment Revision 0	BOS entry trigger BOS Threshold: Biodiversity Values Map	Date Finalised 25/03/2026

* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

List of Species Requiring Survey

Name	Presence	Survey Months

Threatened species Manually Added

None added

Threatened species assessed as not on site

Refer to BAR for detailed justification

Common name	Scientific name	Justification in the BAM-C
Eastern Australian Underground Orchid	Rhizanthella slateri	Habitat degraded
Haloragodendron lucasii	Haloragodendron lucasii	Habitat degraded Habitat constraints Geographic limitations
Julian's Hibbertia	Hibbertia spanantha	Habitat degraded
Large Bent-winged Bat	Miniopterus orianae oceanensis	Habitat degraded Habitat constraints
Large-eared Pied Bat	Chalinolobus dwyeri	Habitat degraded
Little Bent-winged Bat	Miniopterus australis	Habitat degraded Habitat constraints

Regent Honeyeater	Anthochaera phrygia	Habitat degraded Habitat constraints
Scrub Turpentine	Rhodamnia rubescens	Habitat degraded
Swift Parrot	Lathamus discolor	Habitat degraded Habitat constraints

Masked Owl	Tyto novaehollandiae	Habitat degraded Habitat constraints
Netted Bottle Brush	Callistemon linearifolius	Habitat degraded
P. prunifolia in the Parramatta, Auburn, Strathfield and Bankstown Local Government Areas	Pomaderris prunifolia - endangered population	Habitat degraded
Powerful Owl	Ninox strenua	Habitat degraded Habitat constraints
Red-crowned Toadlet	Pseudophryne australis	Habitat degraded
Regent Honeyeater	Anthochaera phrygia	Habitat degraded Habitat constraints
Scrub Turpentine	Rhodamnia rubescens	Habitat degraded
South-eastern Glossy Black-Cockatoo	Calyptorhynchus lathami lathami	Habitat degraded Habitat constraints
Southern Myotis	Myotis macropus	Habitat degraded Habitat constraints
Square-tailed Kite	Lophoictinia isura	Habitat degraded Habitat constraints
Squirrel Glider	Petaurus norfolcensis	Habitat degraded
Swift Parrot	Lathamus discolor	Habitat degraded Habitat constraints
White-bellied Sea-Eagle	Haliaeetus leucogaster	Habitat degraded Habitat constraints

BAM Predicted Species Report

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00057567/BAAS24033/26/00065308	19-25 Balfour St Lindfield	05/08/2025
Assessor Name	**Report Created**	**BAM Data version ***
Josie Drevon	25/03/2026	Current classification (live - default) (82)
Assessor Number	**Assessment Type**	**BAM Case Status**
BAAS24033	Part 4 Developments (Small Area)	Finalised
Assessment Revision	**BOS entry trigger**	**Date Finalised**
0	BOS Threshold: Biodiversity Values Map	25/03/2026

* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

Threatened species reliably predicted to utilise the site. No surveys are required for these species. Ecosystem credits apply to these species.

Common Name	Scientific Name	Vegetation Types(s)
Black-chinned Honeyeater (eastern subspecies)	Melithreptus gularis gularis	3262-Sydney Turpentine Ironbark Forest
Brown Treecreeper (eastern subspecies)	Climacteris picumnus victoriae	3262-Sydney Turpentine Ironbark Forest
Diamond Firetail	Stagonopleura guttata	3262-Sydney Turpentine Ironbark Forest
Dusky Woodswallow	Artamus cyanopterus cyanopterus	3262-Sydney Turpentine Ironbark Forest
Eastern Coastal Free-tailed Bat	Micronomus norfolkensis	3262-Sydney Turpentine Ironbark Forest
Eastern Osprey	Pandion cristatus	3262-Sydney Turpentine Ironbark Forest
Flame Robin	Petroica phoenicea	3262-Sydney Turpentine Ironbark Forest
Gang-gang Cockatoo	Callocephalon fimbriatum	3262-Sydney Turpentine Ironbark Forest
Grey-headed Flying-fox	Pteropus poliocephalus	3262-Sydney Turpentine Ironbark Forest

Large Bent-winged Bat	Miniopterus orianae oceanensis	3262-Sydney Turpentine Ironbark Forest
Little Bent-winged Bat	Miniopterus australis	3262-Sydney Turpentine Ironbark Forest
Little Eagle	Hieraaetus morphnoides	3262-Sydney Turpentine Ironbark Forest
Little Lorikeet	Glossopsitta pusilla	3262-Sydney Turpentine Ironbark Forest
Regent Honeyeater	Anthochaera phrygia	3262-Sydney Turpentine Ironbark Forest
Rosenberg's Goanna	Varanus rosenbergi	3262-Sydney Turpentine Ironbark Forest
South-eastern Hooded Robin	Melanodryas cucullata cucullata	3262-Sydney Turpentine Ironbark Forest
Speckled Warbler	Chthonicola sagittata	3262-Sydney Turpentine Ironbark Forest
Spotted-tailed Quoll	Dasyurus maculatus	3262-Sydney Turpentine Ironbark Forest
Square-tailed Kite	Lophoictinia isura	3262-Sydney Turpentine Ironbark Forest
Swift Parrot	Lathamus discolor	3262-Sydney Turpentine Ironbark Forest
Varied Sittella	Daphoenositta chrysoptera	3262-Sydney Turpentine Ironbark Forest
White-throated Needletail	Hirundapus caudacutus	3262-Sydney Turpentine Ironbark Forest
Yellow-bellied Sheathtail-bat	Saccolaimus flaviventris	3262-Sydney Turpentine Ironbark Forest

Threatened species Manually Added

None added

Threatened species assessed as not within the vegetation zone(s) for the PCT(s)

Common Name	Scientific Name	Plant Community Type(s)
Black Bittern	Ixobrychus flavicollis	3262-Sydney Turpentine Ironbark Forest
Black-necked Stork	Ephippiorhynchus asiaticus	3262-Sydney Turpentine Ironbark Forest
Painted Honeyeater	Grantiella picta	3262-Sydney Turpentine Ironbark Forest
Pilotbird	Pycnoptilus floccosus	3262-Sydney Turpentine Ironbark Forest
South-eastern Glossy Black-Cockatoo	Calyptorhynchus lathami lathami	3262-Sydney Turpentine Ironbark Forest

White-bellied Sea-Eagle	Haliaeetus leucogaster	3262-Sydney Turpentine Ironbark Forest

Threatened species assessed as not within the vegetation zone(s) for the PCT(s)

Refer to BAR for detailed justification

Common Name	Scientific Name	Justification in the BAM-C
Black Bittern	Ixobrychus flavicollis	Habitat constraints
Black-necked Stork	Ephippiorhynchus asiaticus	Habitat constraints
Painted Honeyeater	Grantiella picta	Habitat constraints
Pilotbird	Pycnoptilus floccosus	Refer to BAR
South-eastern Glossy Black-Cockatoo	Calyptorhynchus lathami lathami	Habitat constraints
White-bellied Sea-Eagle	Haliaeetus leucogaster	Habitat constraints

BAM Vegetation Zones Report

Proposal Details

Assessment Id	Assessment name	BAM data last updated *
00057567/BAAS24033/26/00065308	19-25 Balfour St Lindfield	05/08/2025
Assessor Name	Report Created	BAM Data version *
Josie Drevon	25/03/2026	Current classification (live - default) (82)
Assessor Number	Assessment Type	BAM Case Status
BAAS24033	Part 4 Developments (Small Area)	Finalised
Assessment Revision	BOS entry trigger	Date Finalised
0	BOS Threshold: Biodiversity Values Map	25/03/2026

* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

Vegetation Zones

#	Name	PCT	Condition	Area	Minimum number of plots	Management zones
1	3262_Urbanised	3262-Sydney Turpentine Ironbark Forest	Urbanised	0.01	1	

Appendix 4 – Species representative of Sydney Turpentine Ironbark Forest (STIF)

Source: Bionet Vegetation Classification

TREES	
Species	Frequency of occurrence
Syncarpia glomulifera	84
Notelaea longifolia	56
Allocasuarina torulosa	46
Angophora costata	46
Acacia parramattensis	45
Eucalyptus pilularis	44
Eucalyptus punctata	36
Eucalyptus paniculata	30
Eucalyptus resinifera	30
Eucalyptus globoidea	25
Clerodendrum tomentosum	20
Corymbia gummifera	16
Angophora floribunda	15
Allocasuarina littoralis	14
Glochidion ferdinandi	14
Eucalyptus fibrosa	12
Acacia decurrens	9
Brachychiton acerifolius	8
Eucalyptus eugenioides	7
Eucalyptus haemastoma	7
Eucalyptus crebra	6
Eucalyptus deanei	6
Eucalyptus acmenoides	5
Eucalyptus notabilis	5
Eucalyptus saligna	5
Eucalyptus tereticornis	5
Melia azedarach	5
Corymbia maculata	4
Eucalyptus agglomerata	4
Eucalyptus piperita	4
Grevillea robusta	4
Alphitonia excelsa	3
Casuarina glauca	3
Eucalyptus sparsifolia	3
Angophora bakeri	2
Brachychiton populneus	2
Eucalyptus umbra	2
Acacia binervia	1
Acacia elata	1

Species	Frequency of occurrence
Acmena smithii	1
Araucaria cunninghamii	1
Ceratopetalum apetalum	1
Ceratopetalum gummiferum	1
Cupaniopsis anacardioides	1
Eucalyptus botryoides <--> saligna	1
Eucalyptus longifolia	1
Eucalyptus moluccana	1
Eucalyptus oblonga	1
Eucalyptus racemosa	1
Eucalyptus sclerophylla	1
Eucalyptus sieberi	1
Trochocarpa laurina	1

SHRUBS	
Species	Frequency of occurrence
Pittosporum undulatum	79
Leucopogon juniperinus	78
Polyscias sambucifolia	65
Breynia oblongifolia	64
Hibbertia aspera	55
Ozothamnus diosmifolius	51
Bursaria spinosa	47
Dodonaea triquetra	47
Persoonia linearis	43
Pittosporum revolutum	36
Exocarpos cupressiformis	28
Myrsine variabilis	28
Zieria smithii	28
Acacia longifolia	27
Phyllanthus hirtellus	27
Pimelea linifolia	20
Acacia ulicifolia	19
Kunzea ambigua	18
Denhamia silvestris	17
Acacia floribunda	16
Acacia implexa	15
Elaeocarpus reticulatus	15
Hibbertia diffusa	15
Leucopogon lanceolatus	15
Platylobium formosum	15
Lomatia silaifolia	14
Acacia linifolia	13
Correa reflexa	13

Species	Frequency of occurrence
Acacia falcata	12
Hakea sericea	11
Indigofera australis	11
Podolobium ilicifolium	11
Daviesia ulicifolia	10
Homalanthus populifolius	9
Pomaderris intermedia	9
Acacia myrtifolia	7
Persoonia levis	7
Phyllanthus gunnii	7
Pultenaea villosa	7
Acacia stricta	6
Acrotriche divaricata	6
Goodenia ovata	6
Leptospermum polygalifolium	6
Leptospermum trinervium	6
Pultenaea flexilis	6
Backhousia myrtifolia	5
Exocarpos strictus	5
Hibbertia obtusifolia	5
Lasiopetalum ferrugineum	5
Lissanthe sapida	5
Olearia microphylla	5
Olearia viscidula	5
Pomaderris elliptica subsp. elliptica	5
Trema tomentosa var. aspera	5
Astrotricha latifolia	4
Hakea salicifolia	4
Lasiopetalum parviflorum	4
Melaleuca nodosa	4
Micrantheum ericoides	4
Pomaderris ferruginea	4
Acacia longissima	3
Acacia parvipinnula	3
Acacia terminalis	3
Astrotricha floccosa	3
Bossiaea obcordata	3
Hibbertia empetrifolia subsp. empetrifolia	3
Jacksonia scoparia	3
Persoonia laurina	3
Platysace lanceolata	3
Pomaderris lanigera	3
Pultenaea linophylla	3
Pultenaea retusa	3
Rubus parvifolius	3

Species	Frequency of occurrence
Acacia fimbriata	2
Acacia irrorata	2
Acacia penninervis	2
Acacia suaveolens	2
Banksia spinulosa	2
Calotis dentex	2
Cassinia aculeata	2
Epacris pulchella	2
Gompholobium latifolium	2
Grevillea sericea	2
Hakea dactyloides	2
Leptomeria acida	2
Lissanthe strigosa	2
Melaleuca decora	2
Notelaea venosa	2
Persoonia pinifolia	2
Pittosporum multiflorum	2
Pultenaea scabra	2
Santalum obtusifolium	2
Acacia mearnsii	1
Acacia obtusifolia	1
Acacia paradoxa	1
Acacia trinervata	1
Astroloma humifusum	1
Bossiaea buxifolia	1
Commersonia dasyphylla	1
Coronidium elatum	1
Dodonaea viscosa	1
Epacris longiflora	1
Epacris purpurascens	1
Gompholobium inconspicuum	1
Grevillea linearifolia	1
Hibbertia bracteata	1
Hibbertia linearis	1
Hibbertia monogyna	1
Hovea longifolia	1
Isopogon anemonifolius	1
Leucopogon muticus	1
Logania albiflora	1
Melaleuca styphelioides	1
Melicope micrococca	1
Myrsine howittiana	1
Notelaea ovata	1
Persoonia oblongata	1
Pimelea latifolia subsp. hirsuta	1

Species	Frequency of occurrence
Pultenaea daphnoides	1
Pultenaea mollis	1
Solanum brownii	1
Stenocarpus salignus	1
Zieria pilosa	1

FERNS	
Species	Frequency of occurrence
Cheilanthes sieberi subsp. sieberi	45
Adiantum aethiopicum	22
Pteridium esculentum	20
Doodia aspera	13
Lindsaea microphylla	12
Blechnum cartilagineum	5
Asplenium flabellifolium	4
Lindsaea linearis	4
Pellaea falcata	4
Adiantum hispidulum	3
Cheilanthes austrotenuifolia	3
Nephrolepis cordifolia	2
Blechnum ambiguum	1
Blechnum spinulosum	1
Hypolepis muelleri	1
Pteris tremula	1

FORBS	
Species	Frequency of occurrence
Dianella caerulea	82
Lobelia purpurascens	82
Pseuderanthemum variabile	59
Dichondra repens	53
Pomax umbellata	30
Veronica plebeia	25
Centella asiatica	23
Dianella revoluta	22
Gonocarpus tetragynus	20
Hydrocotyle sibthorpioides	20
Oxalis perennans	20
Poranthera microphylla	20
Solanum prinophyllum	20
Goodenia hederacea	19
Oxalis exilis	17
Opercularia diphylla	15
Brunoniella pumilio	12

Species	Frequency of occurrence
Desmodium rhytidophyllum	11
Commelina cyanea	10
Lagenophora stipitata	10
Stypandra glauca	10
Brunoniella australis	9
Galium binifolium	9
Opercularia hispida	9
Arthropodium milleflorum	8
Coronidium scorpioides	8
Vernonia cinerea	8
Wahlenbergia gracilis	8
Einadia hastata	7
Pterostylis longifolia	7
Sigesbeckia orientalis subsp. orientalis	7
Dianella longifolia	6
Gonocarpus teucrioides	6
Acianthus fornicatus	5
Geranium homeanum	5
Hydrocotyle laxiflora	5
Hypericum gramineum	5
Opercularia aspera	5
Pterostylis nutans	5
Viola hederacea	5
Brachyscome angustifolia	4
Brachyscome graminea	4
Cryptostylis erecta	4
Goodenia heterophylla	4
Opercularia varia	4
Oxalis chnoodes	4
Patersonia glabrata	4
Plectranthus parviflorus	4
Pterostylis grandiflora	4
Stackhousia viminea	4
Viola betonicifolia	4
Xanthosia tridentata	4
Bossiaea prostrata	3
Caesia parviflora	3
Chrysocephalum apiculatum	3
Einadia trigonos	3
Geranium solanderi	3
Helichrysum rutidolepis	3
Plantago debilis	3
Senecio hispidulus	3
Solenogyne bellioides	3
Arthropodium minus	2

Species	Frequency of occurrence
Caladenia catenata	2
Calotis cuneifolia	2
Dampiera purpurea	2
Dendrobium speciosum	2
Dichondra sp. Inglewood	2
Drosera auriculata	2
Galium leiocarpum	2
Hypoxis hygrometrica	2
Hypoxis pratensis	2
Lagenophora gracilis	2
Laxmannia gracilis	2
Microtis parviflora	2
Solanum pungetium	2
Thysanotus tuberosus	2
Trachymene incisa subsp. incisa	2
Veronica calycina	2
Xanthosia pilosa	2
Acianthus exsertus	1
Acianthus pusillus	1
Arthropodium sp. South-east Highlands	1
Centipeda minima subsp. minima	1
Chiloglottis formicifera	1
Corybas fimbriatus	1
Cryptostylis subulata	1
Desmodium gunnii	1
Dipodium variegatum	1
Euchiton involucratus	1
Euchiton sphaericus	1
Galium gaudichaudii	1
Goodenia bellidifolia	1
Hovea linearis	1
Hydrocotyle tripartita	1
Hypericum japonicum	1
Oxytes brachypoda	1
Persicaria decipiens	1
Phyllanthus similis	1
Pterostylis acuminata	1
Senecio bathurstianus	1
Senecio biserratus	1
Senecio pinnatifolius	1
Stackhousia monogyna	1
Stylidium graminifolium	1
Thelymitra pauciflora	1
Tricoryne simplex	1
Viola caleyana	1

GRASS & GRASSLIKE	
Species	Frequency of occurrence
Microlaena stipoides	88
Entolasia stricta	83
Lomandra longifolia	73
Lepidosperma laterale	65
Entolasia marginata	58
Imperata cylindrica	55
Themeda triandra	53
Aristida vagans	45
Echinopogon caespitosus	45
Lomandra filiformis	40
Lomandra multiflora subsp. multiflora	39
Oplismenus aemulus	34
Oplismenus imbecillis	33
Poa affinis	26
Echinopogon ovatus	25
Panicum simile	23
Austrostipa rudis	21
Digitaria parviflora	20
Lomandra obliqua	20
Austrostipa pubescens	18
Dichelachne micrantha	15
Cymbopogon refractus	14
Eragrostis leptostachya	11
Paspalidium distans	11
Anisopogon avenaceus	10
Gahnia aspera	10
Eragrostis brownii	9
Cynodon dactylon	8
Poa labillardierei var. labillardierei	7
Carex inversa	5
Cyathochaeta diandra	5
Dichelachne inaequiglumis	5
Lepidosperma gunnii	5
Lomandra confertifolia	5
Lomandra cylindrica	5
Rytidosperma racemosum	5
Rytidosperma tenuius	5
Schoenus melanostachys	5
Aristida ramosa	4
Austrostipa ramosissima	4
Dichelachne parva	4
Digitaria diffusa	4

Species	Frequency of occurrence
Digitaria ramularis	4
Lomandra brevis	4
Lomandra gracilis	4
Poa sieberiana	4
Cyperus imbecillis	3
Dichelachne rara	3
Juncus usitatus	3
Sporobolus creber	3
Carex breviculmis	2
Cyperus gracilis	2
Cyperus laevis	2
Digitaria didactyla	2
Lachnagrostis filiformis	2
Lepidosperma latens	2
Paspalidium gracile	2
Austrostipa verticillata	1
Bothriochloa decipiens var. decipiens	1
Bothriochloa macra	1
Deyeuxia quadriseta	1
Fimbristylis dichotoma	1
Gahnia clarkei	1
Isolepis inundata	1
Juncus planifolius	1
Juncus vaginatus	1
Lachnagrostis aemula	1
Lepidosperma concavum	1
Lepidosperma filiforme	1
Lepidosperma urophorum	1
Lomandra glauca	1
Paspalidium aversum	1
Rytidosperma bipartitum	1
Rytidosperma longifolium	1
Rytidosperma pallidum	1
Rytidosperma pilosum	1
Rytidosperma semiannulare	1
Rytidosperma setaceum	1
Schoenus maschalinus	1
Tetraria capillaris	1

OTHER	
Species	Frequency of occurrence
Billardiera scandens	63
Pandorea pandorana subsp. pandorana	55

Species	Frequency of occurrence
Glycine clandestina	45
Glycine microphylla	43
Eustrephus latifolius	41
Clematis glycinoides	35
Tylophora barbata	33
Clematis aristata	26
Hardenbergia violacea	26
Desmodium varians	22
Glycine tabacina	19
Cassytha pubescens	18
Kennedia rubicunda	18
Cassytha glabella	15
Geitonoplesium cymosum	14
Parsonsia straminea	13
Smilax glyciphylla	13
Smilax australis	10
Gynochthodes jasminoides	9
Passiflora herbertiana subsp. herbertiana	6
Cayratia clematidea	5
Hibbertia dentata	5
Stephania japonica var. discolor	5
Calochlaena dubia	4
Xanthorrhoea media	4
Cissus antarctica	3
Livistona australis	3
Polymeria calycina	3
Sarcopetalum harveyanum	3
Xanthorrhoea concava	3
Cissus hypoglauca	2
Xanthorrhoea arborea	2
Xanthorrhoea minor	2
Comesperma volubile	1
Cordyline stricta	1
Cyathea australis	1
Cymbidium suave	1
Dendrophthoe vitellina	1
Doryanthes excelsa	1
Hibbertia scandens	1
Marsdenia suaveolens	1

Appendix 5 – Response to Council's review of BDAR

The following is a response to Council's submission to DHPI regarding their review of the BDAR:

1. **Survey design and data quality: BAM requires representative plots across all condition states. The BDAR relied on a single degraded landscaped plot, producing a VIS of 3. This ignores the former STIF condition and unlawfully cleared areas, leading to an artificially low score. The survey design is inadequate and non compliant.**

   ACS Response:

   A single vegetation zone (condition state) was delineated across the whole site, being entirely exotic landscaped garden beds and lawns with a couple of very small patches of native ground cover scattered in the rear yards. As per BAM Section 3.4.3, the "Current" condition of native vegetation on the subject land was assessed and BAM plots were placed to include as much native vegetation as possible.

   ACS Environmental noted that one or two native trees representative of STIF were dead. It was reported to council who said they were aware of the dead trees, but could not prove how or when this occurred. Judging by the condition of the trees, ACS assessed they more than likely died within the last 5 years. As per Section 3.4 of the BAM, the condition state and biodiversity values were ascertained to have changed within the last 5 years due to the removal of these trees, so an "onsite" assessment was undertaken. We have ascertained what the most likely original PCT was (as per Box 2 – BAM Operational Manual – Stage 1), which agrees with current mapping, and can only base the VI scores on that assessment.

2. **Avoidance and minimisation: BAM requires demonstration of avoidance and minimisation before offsets are considered. The BDAR claims avoidance by noting the footprint does not encroach into adjoining tree protection zones, but within the site all remnant or indicative STIF is removed. No alternative layouts were tested. Landscaping with up to 80% STIF species is proposed as mitigation, but this is not an avoidance measure under BAM. The avoidance hierarchy has not been applied.**

   ACS Response:

   Alternative layouts were considered as discussed in Section 4.4. Redesign of development footprints to avoid impacts to Biodiversity Values is applying the avoidance hierarchy, as state in section 3.1 of the BAM.

3. **Offsets: BAM requires offsets to be calculated where impacts remain. The BDAR concludes no offsets are required on the basis of the degraded plot data, despite acknowledging clearing of 0.0121 ha of vegetation indicative of STIF. Offsets have been avoided by underestimating biodiversity values. This is inconsistent with BAM.**

   ACS Response:

   As per 1: Offsets have been calculated by the BAM-C based on measured "Current State" native vegetation cover and complies with BAM methodology.

4. **Consistency with planning instruments: The proposal conflicts with LEP 2015 Clause 6.3 as it does not protect, maintain or improve biodiversity values and fails to avoid TEC loss. It also conflicts with DCP Part 18 by not providing for genuine restoration or connectivity.**

   ACS Response:

   The loss of the TEC is in the form of small patches of (non-threatened) ground cover species of about 0.012ha (121m2), which is addressed in the VMP, by using these and other representative species of STIF in the landscaping. Existing connectivity is not affected as no live canopy trees are being impacted. Regardless, replanting of STIF canopy trees has been recommended in the VMP.