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101 Sussex Street
Sydney NSW 2000
t: (02) 9259 3800

16 March 2020

Our ref: 19SYD - 14990

Fabcot Pty Ltd c/o Nettleton Tribe Architects

Attention: Donal Challoner

Dear Donal,

RE: 74 Edinburgh Road, Marrickville – Biodiversity Development Assessment Report Waiver

Eco Logical Australia Pty Ltd (ELA) was engaged by Fabcot Pty Ltd to provide a biodiversity assessment of the proposed redevelopment of an existing industrial site at 74 Edinburgh Road, Marrickville (Lot 202 DP 1133999) ('the development site').

The proposed development is to be assessed as a State Significant Development (SSD) by the Department of Planning, Industry and Environment (DPIE). As an SSD, Section 7.9 (2) of the *Biodiversity Conservation Act 2016* (BC Act) states the following:

> *"Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values."*

ELA conducted a field survey followed by an assessment of potential impacts to biodiversity values and concluded that the development will not have a significant impact on biodiversity values.

The BC Act also outlines the assessment requirements to determine whether a proposed development or activity is likely to significantly affect threatened species or ecological communities, or their habitats under Section 7.3 of the Act, and whether the Biodiversity Offsets Scheme (BOS) will be triggered. If thresholds for the BOS and application of the Biodiversity Assessment Method (BAM) are triggered, a Biodiversity Development Assessment Report (BDAR) would be required. Triggers for the BOS and BAM are as follows:

- Exceeding a native vegetation area clearance threshold relative to minimum lot size under the Local Environmental Plan, or actual lot size where not minimum lot size is provided; or
- Clearing of native vegetation identified on the NSW Government Biodiversity Values Map; or
- A significant impact on a threatened species or ecological community (as assessed by a qualified ecologist).

The proposal includes clearing a vegetation area of 0.27 ha, which does not trigger the area clearing threshold (0.5 ha or more) for an actual lot size of 2.81 ha. The development site is not mapped on the

NSW Government Biodiversity Values Map (accessed 9 March 2020). The development will not have a significant impact on biodiversity values. The proposed development therefore does not trigger the BOS.

It was determined that the applicant should seek a waiver from the need to prepare a BDAR. The attached tables describe the biodiversity values and impact in accordance with the NSW Department of Planning & Environment's 2018 *Biodiversity development assessment report waiver determinations for SSD and SSI applications fact sheet*. It is noted that Secretary's Environmental Assessment Requirements (SEARs) have not yet been issued for this project. The SEARs may require other biodiversity issues to be addressed.

Regards,

Carolina Mora
Ecologist

1. Biodiversity Development Assessment Report waiver request information

The information requirements for a BDAR waiver request, as outlined in the NSW Department of Planning and Environment's Guidelines, are provided in Table 1 and Table 2.

Table 1: BDAR waiver request information requirements

Requirement	Information
Administration	Proponent: Fabcot Pty Ltd Project ID: Not yet assigned Progress: Early consultation Completed by: Carolina Mora – Ecologist (Eco Logical Australia), B.Sc. (Advanced, Honours Class I) Reviewed by: Diane Campbell – Senior Ecologist, BAM accredited assessor (Eco Logical Australia), B.Sc. and Nicole McVicar – Senior Ecologist, BAM accredited assessor (Eco Logical Australia, B.Env.Sc.
Site Details	Street address: 74 Edinburgh Road, Marrickville Lot and DP: Lot 202 DP 1133999 Local government area (LGA): Inner West Council. The site is currently zoned as IN1: General Industrial and includes an easement zoned as SP2: Infrastructure under the Marrickville Local Environmental Plan 2011. Existing development site: The site is comprised of an unused entrance kiosk, three large, active industrial buildings, multiple car parks and nature strips. The size of the site is approximately 2.81 ha. No minimum lot size is provided under the Marrickville Local Environmental Plan 2011. The development site is not mapped under the NSW Government Biodiversity Values Map (accessed 9 March 2020). A location map is presented in Figure 1.
Proposed Development	The proposal for the redevelopment of the industrial site at 74 Edinburgh Road, Marrickville seeks consent for the demolition of existing structures and clearing of vegetation in the nature strips scattered throughout the site. The development proposes the construction of two warehouse buildings, loading docks, multiple office buildings, car and truck parking areas; as well as a six-metre fire trail. The preliminary preferred development scheme is presented in Figure 2.

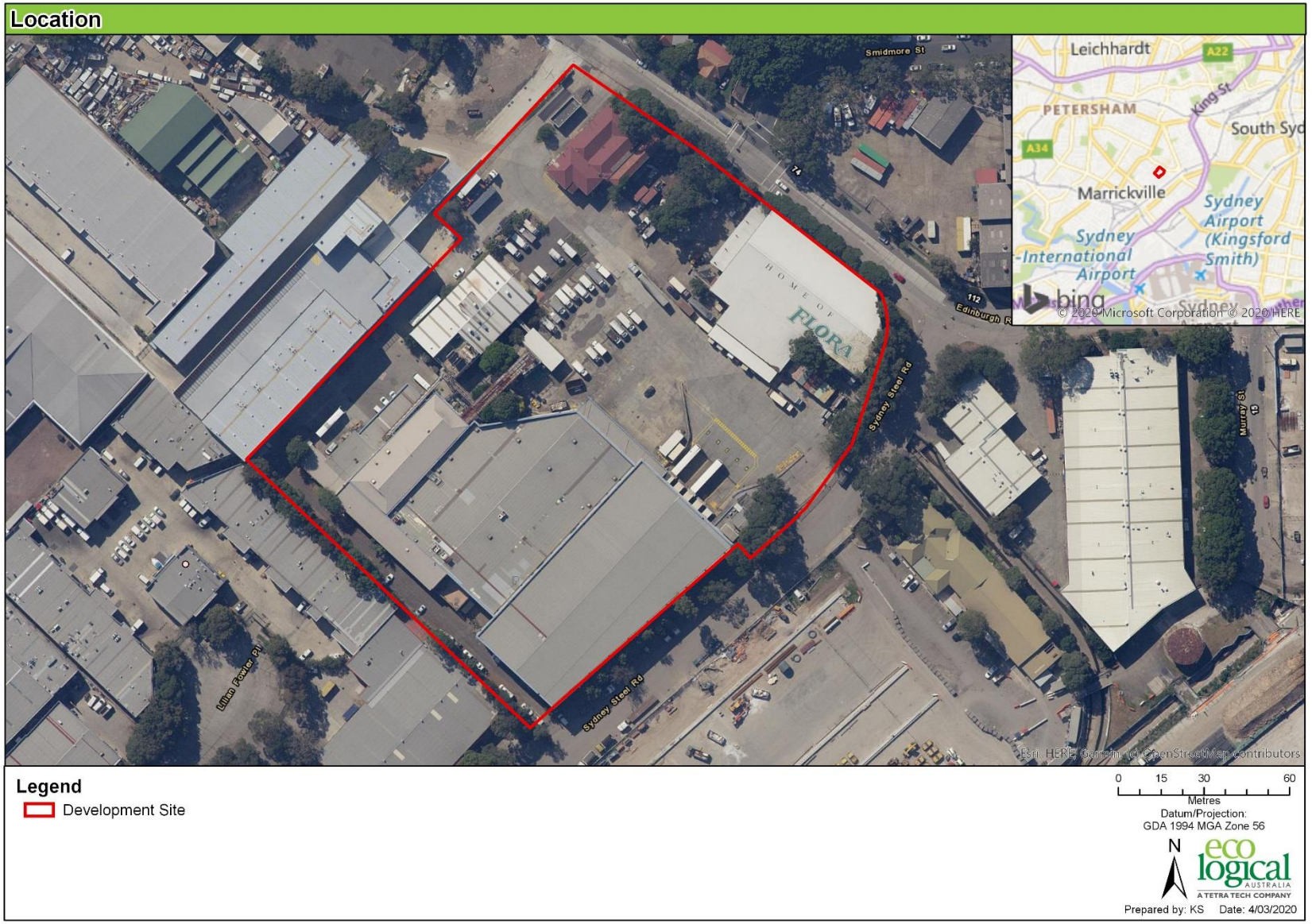

Figure 1: Location of the proposed works.

General	Area
SITE AREA	23,549.m²
REMAINING SITE AREA	4,460.m²
TOTAL SITE AREA	28,009.m²

ROAD WIDENING A	293.m²
ROAD WIDENING B	483.m²
UNDEVELOPABLE AREA	776.m²

TOTAL DEVELOPABLE AREA	27,233.m²

Name		Area
SPEC WAREHOUSE 1	(Ground Level)	4,411.m²
SPEC WAREHOUSE 2	(Ground Level)	4,411.m²
CFC WAREHOUSE	(Level 2)	16,450.m²
TOTAL INDUSTRIAL		25,272.m²
ONLINE PICKUP	(Ground Level)	109.8m²
CFC OFFICE 1	(Level 3)	3,028.5m²
CFC OFFICE 2	(Level 2)	1,539.m²
TOTAL CFC OFFICE		4,567.5m²
STRATA OFFICE 1	(Ground Level)	621.m²
STRATA OFFICE 2	(Ground Level)	392.4m²
STRATA OFFICE 3	(Ground Level)	111.6m²
WH OFFICE 1	(Ground Level)	142.2m²
WH OFFICE 2	(Ground Level)	108.m²
STRATA OFFICE 4	(Level 3)	1,043.1m²
STRATA OFFICE 5	(Level 4)	1,539.m²
STRATA OFFICE 6	(Level 4)	1,043.1m²
STRATA OFFICE 7	(Level 5)	1,539.m²
STRATA OFFICE 8	(Level 5)	1,043.1m²
TOTAL OFFICE		7,582.5m²
TOTAL COMMERCIAL (EXC.PICKUP)		12,150.m²
OUTDOOR	(Ground Level)	50.m²
LOBBY	(Ground Level)	62.m²
LOBBY 1	(Ground Level)	75.m²
LIFT+STAIR	(Ground Level)	31.m²
STAIR+LIFT	(Ground Level)	33.m²
BOH	(Ground Level)	52.m²
COMM.BOH	(Ground Level)	280.m²
CFC HOIST AREA	(Ground Level)	428.4m²
TOTAL GFA		37,531.8m²

FSR	
ALLOWABLE FSR	0.95:1
ACHIEVED FSR	1.33:1

CARS REQUIRED	
COMMERCIAL (INC.CFC OFFICE)	203
INDUSTRIAL	253
PICK UP	4
TOTAL REQ. CARS	460

CARS PROVIDED	
GROUND FLOOR	255
LEVEL 1	206
TOTAL PROV. CARS	461

VAN PARKING PROVIDED	
LEVEL 2	29
LEVEL 3	85
TOTAL PROV. VANS	114

Figure 2: Ground level plan of the preliminary preferred development scheme. Supplied by Nettleton Tribe.

Table 2: Criteria to assess biodiversity under the BC Act and BC Regulation

Biodiversity Value	Meaning	Relevant	Discussion of values within the site
Biodiversity Conservation Regulation (Clause 1.4)			
a) Threatened Species Abundance	The occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site.	N/A	No threatened ecological communities have been previously mapped in the site (Figure 3), nor were any observed within the site during the field survey. The 0.27 ha of vegetation present within the development site was identified as Planted Native/Exotic (Figure 4 and Figure 5). The removal of this vegetation will not trigger the BOS threshold for a lot with the actual size of 2.81 ha (0.5 ha or more). No threatened flora or fauna species were observed within the site during the survey (Appendix A). There are no BioNet (Atlas of NSW Wildlife) records of flora or fauna species previously recorded within the site. Records of threatened species within a 5 km radius of the site are presented in Figure 6 and Figure 7. No habitat was available for threatened flora species due to the high level of modification of vegetation within the site. Due to the limited amount of planted native vegetation present, the site does not contain sufficient foraging resources to sustain any threatened fauna species. At best, native and exotic plantings have the potential to provide marginal seasonal foraging habitat for the highly mobile species *Pteropus poliocephalus* (Grey-headed Flying-fox). The removal of this potential foraging habitat was considered in both the Test of Significance (BC Act) in Appendix A and the Significant Impact Criteria (EPBC Act) in Appendix C. In accordance with these assessments, the proposed development will not result in a significant impact to this threatened species. Suitable roosting habitat for threatened fauna species was not identified within the site.
b) Vegetation Abundance	The occurrence and abundance of vegetation at a particular site.	N/A	Native vegetation within the site was of low abundance. The majority of the site consisted of industrial structures and 0.27 ha of vegetation, mainly within planted nature strips containing native and exotic species and opportunistic weeds. Weed species identified within the site included seven Priority Weeds listed in the Greater Sydney Strategic Weed Management Strategy 2017-2022, one of which is also listed as Weeds of National Significance (Appendix A). Based on the soil landscape and site location, vegetation within the site was not consistent with any remnant native vegetation communities and did not conform to any listed Plant Community Types (PCTs). A full list of flora species identified during field survey is presented in Appendix A.
c) Habitat Connectivity	The degree to which a particular site connects	N/A	Vegetation within the site is part of a highly fragmented urbanised landscape.

Biodiversity Value		Meaning	Relevant	Discussion of values within the site
		different areas of habitat of threatened species to facilitate movement of those species across their range.		The site does not provide any significant level of connectivity to facilitate movement of threatened species across their range.
d)	Threatened Species Movement	The degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle;	N/A	The development site contains minimal vegetation which is fragmented by buildings and areas of hardstand surfaces. Movement for less mobile threatened fauna, such as mammals (not including bats), across the site is highly unlikely due to fencing, buildings, cleared open areas and a lack connective vegetation. Opportunities for movement across the site for more mobile threatened fauna including birds and bats are available, however the site is not considered to be significant for the movement of any threatened species to maintain their lifecycle.
e)	Flight Path Integrity	The degree to which the flight paths of protected animals over a particular site are free from interference.	N/A	Given the limited vegetation within the site, and the absence of connectivity in the canopy, it is unlikely that the site would be a significantly important flight path for protected animals to travel between areas of habitat.
f)	Water Sustainability	The degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.	N/A	No natural water courses are present within the site. Drainage structures were observed within the site but are related to the site's use as an industrial precinct. In its current state, the site is highly disturbed and does not contain water bodies or drainage structures that contribute to hydrological processes that sustain threatened species or ecological communities within or adjacent to the site.
Biodiversity Conservation Act (Clause 1.5 (2))				
a)	Vegetation Integrity	The degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near natural state.	N/A	Due to previous and current land management practices, vegetation and soils within the site have been highly modified or disturbed and lack natural resilience. Native species – some of which are outside their natural range of distribution – have been planted within the site as landscape specimens in an urban environment. Other vegetation within the site includes opportunistic weeds and planted exotic species. Vegetation present within the site was not consistent with any listed Plant Community Type. Overall, vegetation within the site is highly modified and altered from its natural state. Therefore, the development will not compromise the vegetation integrity of the site.
b)	Habitat Suitability	The degree to which the habitat needs of threatened species are present at the particular site.	N/A	Suitable habitat for threatened species is highly limited within the site. Soils within the site have been highly modified and provide no habitat for any threatened flora species. Due to the limited amount of planted native vegetation present, the site does not contain

Biodiversity Value	Meaning	Relevant	Discussion of values within the site
			sufficient foraging resources to sustain any threatened fauna species. The removal of planted native and exotic vegetation, which may provide marginal seasonal foraging habitat for the Grey-headed Flying-fox, will not result in a significant impact to the species. The site lacks geological features, hollow bearing trees, derelict artificial structures or non-native vegetation with the potential to provide nesting or roosting habitat for any threatened fauna species. Therefore, the proposed development will not compromise habitat suitability for threatened species.

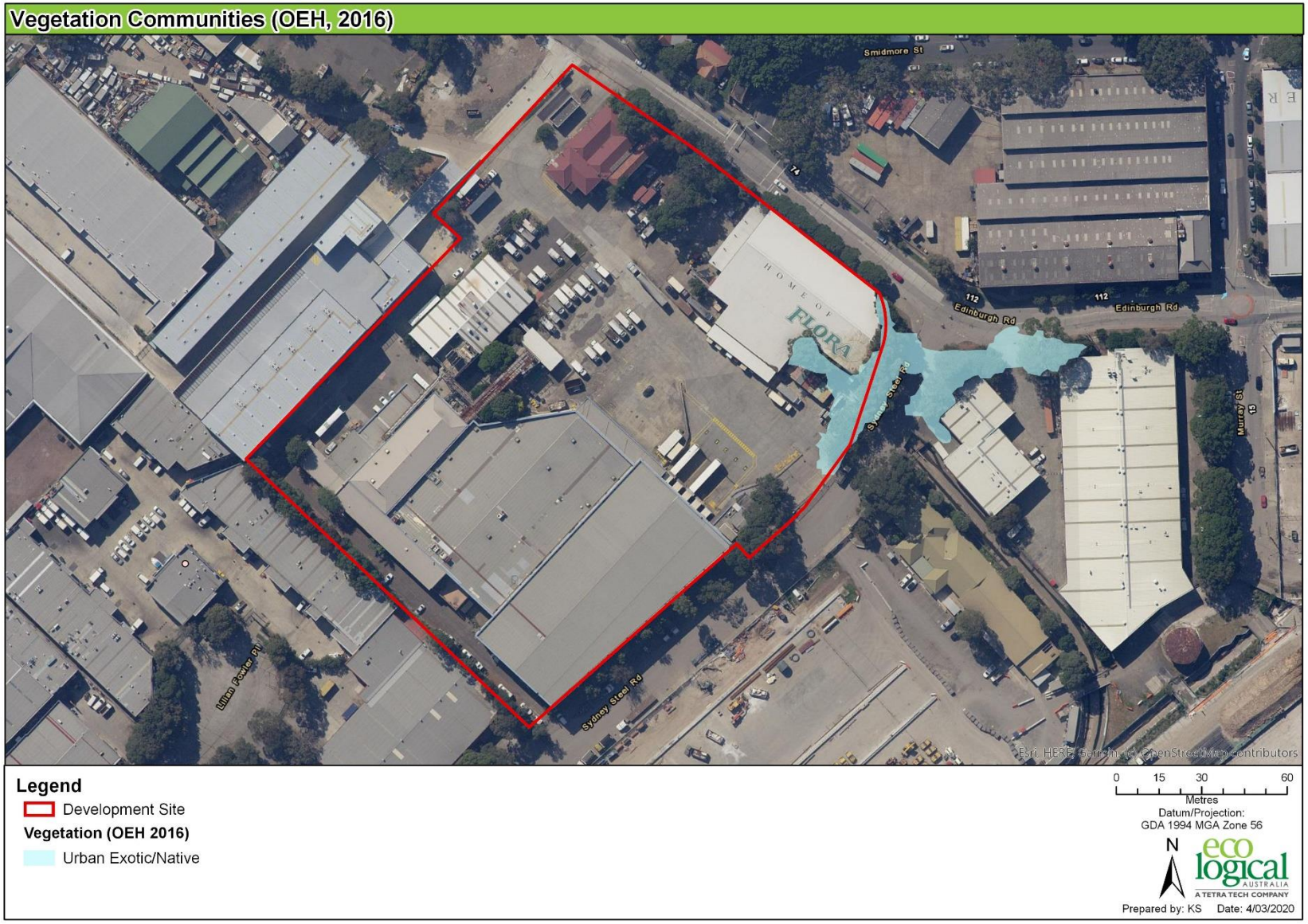

Figure 3: Previously mapped vegetation (OEH 2016).

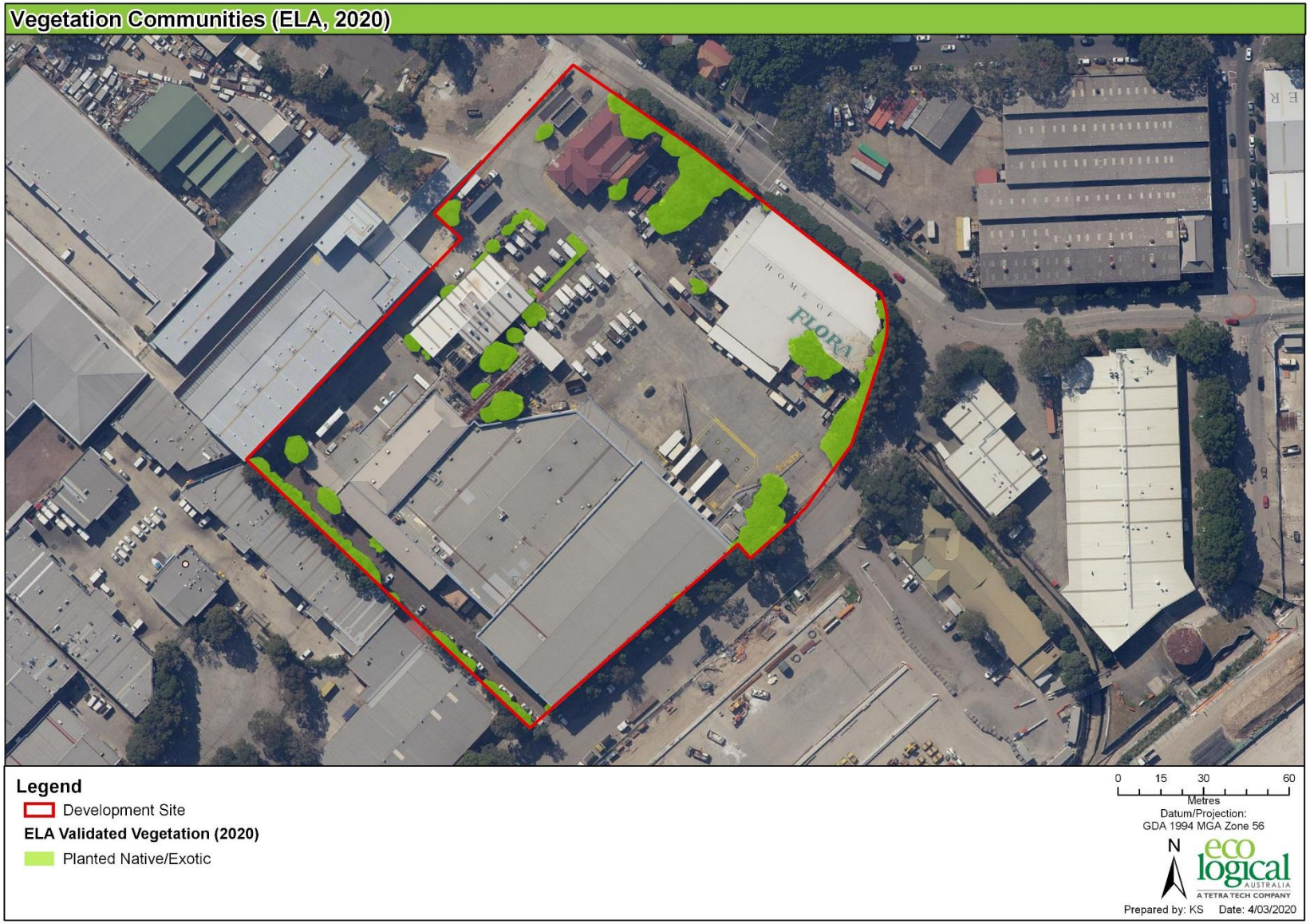

Figure 4: Validated vegetation (ELA 2020).

Figure 5: Vegetation within the development site

Figure 6: Threatened flora records within 5 km radius of the site.

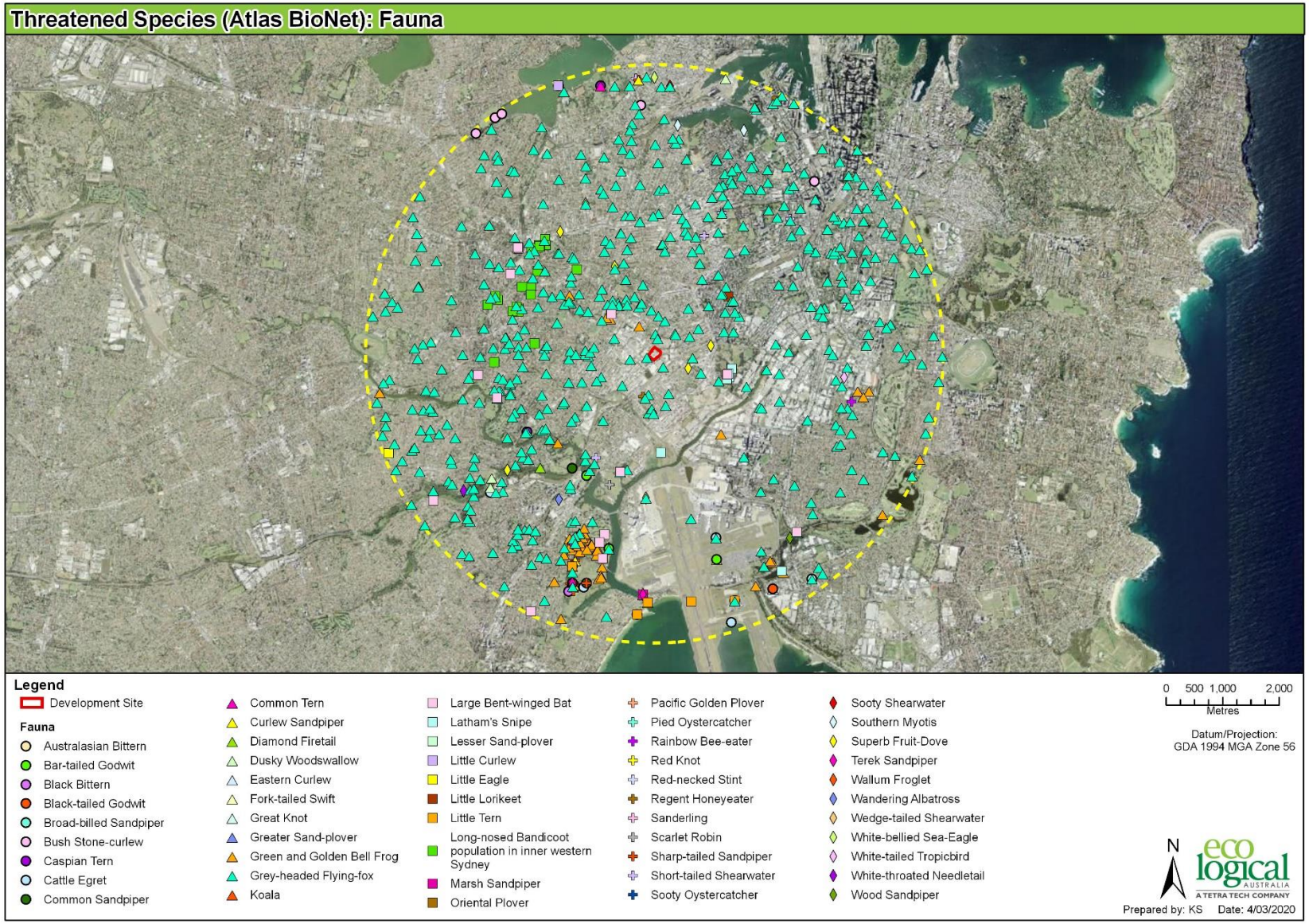

Figure 7: Threatened fauna records within 5 km radius of the site.

Appendix A Species List

Table 3: Indicative species list recorded in the site during survey.

Scientific name	Common name	Native (N) / Exotic (E)
	FLORA	
Acacia podalyriifolia	Queensland Silver Wattle	E
Agapanthus sp.	-	E
Ageratina adenophora	Crofton Weed	E (PW***)
Allocasuarina littoralis	Black She-oak	N
Angophora costata	Sydney Red Gum	N
Araujia sericifera	Moth Vine	E (PW***)
Avena sp.	-	E
Banksia integrifolia	Coast Banksia	N
Bidens pilosa	Cobblers Pegs	E
Bougainvillea sp.	Bougainvillea	E
Breynia oblongifolia	Coffee Bush	N
Bromus sp.	-	E
Callistemon citrinus	Crimson Bottlebrush	N
Celtis sinensis	Japanese Hackberry	E
Cenchrus clandestinus	Kikuyu Grass	E
Cenchrus setaceus	Fountain Grass	E
Chloris gayana	Rhodes Grass	E (PW***)
Cinnamomum camphor	Camphor Laurel	E (PW***)
Cissus antarctica	Kangaroo Vine	N
Clematis aristata	Old Man's Beard	N
Commelina cyanea	-	N
Conyza bonariensis	Flaxleaf Fleabane	E
Cupaniopsis anacardioides	Tuckeroo	N
Cyperus eragrostis	Umbrella Sedge	E
Dianella caerulea	Blue Flax-lily	N
Ehrharta erecta	Panic Veldtgrass	E
Eriobotrya japonica	Loquat	E
Eucalyptus microcorys	Tallowwood	N
Eucalyptus punctata	Grey Gum	N
Eucalyptus robusta	Swamp Mahogany	N
Grevillea horticultural sp.	Grevillea	N
Hibbertia aspera	Rough Guinea Flower	N

Scientific name	Common name	Native (N) / Exotic (E)
Homolanthus populifolius	Bleeding Heart	E
Hypochaeris radicata	Catsear	E
Jacaranda mimosifolia	Jacaranda	E
Lomandra longifolia	Spiny-headed Mat-rush	N
Melia azedarach	White Cedar	N
Mentha sp.	Mint	E
Nothoscordum inodorum	Onion Weed	E
Olea europaea subsp. *cuspidata*	African Olive	E (PW**)
Oplismenus aemulus	Australian Basket Grass	N
Pandorea jasminoides	Bower Vine	N
Phyllanthus virgatus	-	N
Pittosporum undulatum	Native Daphne	N
Plumbago auriculata	Cape Plumbago	E
Poa affinis	-	N
Ricinus communis	Castor Oil Plant	E
Robinia pseudoacacia	Black Locust	E
Schefflera actinophylla	Umbrella Tree	E
Senecio madagascariensis	Fireweed	E (WoNS, PW*)
Senna pendula	-	E (PW***)
Setaria parviflora	-	E
Solanum nigrum	Black-berry Nightshade	E
Solanum sp.	-	E
Sporobolus africanus	Parramatta Grass	E
Syagrus romanzoffiana	Cocos Palm	E (PW***)
Syncarpia glomulifera	Turpentine	N
Verbena hybrida	Verbena	E
	FAUNA	
Acridotheres tristis	Common Myna	E
Cacatua sanguinea	Little Corella	N
Cantareus aspersus	Garden Snail	E
Felis catus	Cat	E
Gymnorhina tibicen	Australian Magpie	N

WoNS = Weeds of National Signficance, PW = Priority Weed: * State Level, ** Regional Level, *** Other Weed of Regional Concern.

Appendix B Biodiversity Conservation Act 2016 Test of Significance

Section 7.3 of the *Biodiversity Conservation Act 2016* (BC Act) requires a number of factors to be taken into account for the purposes of determining whether a proposed development or activity is likely to significantly affect threatened species or ecological communities, or their habitats. These factors are addressed below for the species likely to be impacted by the proposed development.

B1 *Pteropus poliocephalus* (Grey-headed Flying-fox)

The Grey-headed Flying-fox, listed as vulnerable under the BC Act and Commonwealth *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act), utilises a wide variety of habitats (including disturbed areas) for foraging and are recorded as travelling long distances on feeding forays. Fruits and flowering plants of a wide variety of species are the main food source. The species roosts in large 'camps' of up to 200,000 individuals. Camps are usually formed close to water and along gullies however the species has been known to form camps in urban areas.

This species was not recorded on site during the survey but has been recorded within 5 km of the site. There are two Nationally Important Flying-fox Camps within 5 km of the development site, one to the northeast at Centennial Park and the other to the southwest at Wolli Creek. The proposed development will remove 0.27 ha of planted native and exotic vegetation – some of which includes species that are potential seasonal foraging habitat for this species. No camps will be affected by the proposed development.

BC Act	Question	Response
7.3.1 a)	In the case of a threatened species: whether the proposed development or activity is likely to have an adverse effect on the life cycle of the species such that a viable local population of the species is likely to be placed at risk of extinction	The proposed development will remove 0.27 ha of planted native and exotic vegetation which may provide marginal seasonal foraging opportunities for the species, including *Eucalyptus robusta* and *Banksia integrifolia*. Given the abundance of landscaped gardens and street trees in similar condition (0.62 ha) directly adjacent to the development site, the loss of vegetation is unlikely to adversely affect the Grey-headed Flying-fox such that its population will be placed at risk of extinction.
7.3.1 b) i	In the case of an endangered ecological community or critically endangered ecological community, whether the proposed development or activity: Is likely to have an adverse effect on the extent of the ecological community such that its local occurrence is likely to be placed at risk of extinction, or	Not applicable, this species is not an endangered ecological community or critically endangered ecological community..
7.3.1 b) ii	In the case of an endangered ecological community or critically endangered ecological community: Whether the proposed development or activity is likely to substantially and adversely	Not applicable, this species is not an endangered ecological community or critically endangered ecological community

BC Act	Question	Response
	modify the composition of the ecological community such that its local occurrence is likely to be placed at risk of extinction.	
7.3.1 c) i	In relation to the habitat of a threatened species or ecological community: The extent to which habitat is likely to be removed or modified as a result of the proposed development or activity	The 0.27 ha of planted native and exotic vegetation being removed as part of the proposed development represents marginal foraging habitat for the Grey-headed Flying-Fox. However, given that potential foraging habitat is available in the area surrounding the development site this impact is likely minor. Additionally, this species is highly mobile and is likely to utilise foraging resources within the locality.
7.3.1 c) ii	In relation to the habitat of a threatened species or ecological community: Whether an area of habitat is likely to become fragmented or isolated from other areas of habitat as a result of the proposed development or activity	The area of potential foraging habitat to be removed forms part of highly modified and planted urban nature strips which contains a mix of planted native and exotic vegetation. There are large amounts of similar vegetation available immediately adjacent to the development site. The proposed development is unlikely to have an adverse impact on habitat connectivity. The species is highly mobile and will continue to use the surrounding locality for foraging.
7.3.1 c) iii	In relation to the habitat of a threatened species or ecological community: The importance of the habitat to be removed, modified, fragmented or isolated to the long-term survival of the species, population or ecological community in the locality.	The 0.27 ha of marginal foraging habitat to be removed is considered a minor amount compared with adjacent foraging habitat recorded in the locality. The vegetation within the development site is not considered important for the long-term survival of the Grey-headed Flying-fox population due to the availability of similar vegetation adjacent to the development site. No camps were recorded in the development site.
7.3.1 d)	Whether the proposed development or activity is likely to have an adverse effect on any declared area of outstanding biodiversity value (either directly or indirectly).	The proposed development will not directly or indirectly impact any declared area of outstanding biodiversity value.
7.3.1 e)	Whether the proposed development or activity is or is part of a key threatening process or is likely to increase the impact of a key threatening process.	The clearing of native vegetation is one key threatening process relevant to the proposed development. However, with respect to the Grey-headed Flying-Fox, the proposed development involves a minimal impact to potential foraging habitat in the context of the locality.
Conclusion	Is there likely to be a significant impact?	No. The proposed removal of planted native and exotic vegetation is unlikely to have a significant impact on the Grey-headed Flying Fox for the following reasons: • Foraging habitat within the site is marginal and would provide seasonal foraging opportunities, at best. • Similar foraging habitat (0.62 ha) is abundant immediately adjacent to the development site. • Roosting habitat was not identified within the study area and will not be impacted by the proposed development.

Appendix C - *Environment Protection and Biodiversity Conservation Act 1999* Significant Impact Criteria

The following assessment w prepared in accordance with the *EPBC Act Matters of National Environmental Significance: Significant Impact Guidelines 1.1*. These guidelines have been established to assist proponents to determine whether a proposed action is likely to result in a significant impact on a matter of national environmental significance.

C1 *Pteropus poliocephalus* (Grey-headed Flying-fox)

Criterion	Question	Response
An action is likely to have a significant impact on a vulnerable species if there is a real chance or possibility that it will:		
1)	lead to a long-term decrease in the size of an important population of a species	No roosting habitat (camps) will be affected by the proposed action. However, the proposed action will remove 0.27 ha of planted native and exotic vegetation, some of which comprises marginal seasonal foraging habitat for the Grey-headed Flying-fox. The Grey-headed Flying-fox is recorded as travelling long distances (up to 50 km) on feeding forays. Given the proximity of more suitable habitat within the assessment area, the removal of this potential foraging habitat would not lead to the long-term decrease in the size of an important population of Grey-headed Flying-fox.
2)	reduce the area of occupancy of an important population	The proposed action would reduce the amount of potential foraging habitat for this species by 0.27 ha. The Grey-headed Flying-fox is not known to occupy the development site in the form of a camp but may occasionally forage within the site when feed trees are flowering. The Grey-headed Flying-fox is recorded as travelling long distances on feeding forays and would likely utilise the potential foraging habitat outside of the development site. Therefore the proposed action would reduce the areas of occupancy by 0.27 ha of seasonal foraging habitat.
3)	fragment an existing important population into two or more populations	The proposed action will remove 0.27 ha of vegetation, some of which comprises seasonal foraging habitat for the Grey-headed Flying-fox. No camps will be directly or indirectly removed, and other areas of foraging habitat (0.62 ha) are present directly adjacent to the development site. The species is highly mobile, therefore it is considered that the proposed action will not fragment an existing important population into two or more populations.
4)	adversely affect habitat critical to the survival of a species	The Draft Recovery Plan for the Grey-headed Flying-fox 2017 identifies 'a continuous temporal sequence of productive foraging habitats, linked by migration corridors or stopover habitats, and suitable roosting habitat within nightly commuting distance of foraging areas' as habitat critical to the survival of the species. No camps will be directly or indirectly removed by the proposed action. The proposed action will remove 0.27 ha of vegetation, some of

Criterion	Question	Response
		which comprises seasonal foraging habitat for the Grey-headed Flying-fox. The Grey-headed Flying-fox is recorded as travelling long distances (50 km) on feeding forays and suitable habitat is available outside of the development site. Therefore it is considered the proposed action will not adversely affect habitat critical to the survival of the species.
5)	disrupt the breeding cycle of an important population	The proposed action will remove 0.27 ha of vegetation, some of which comprises marginal seasonal foraging habitat for the Grey-headed Flying-fox. The proposed action will not disrupt the breeding cycle of the Grey-headed Flying-fox given that no camps will be removed by the proposed action and larger areas suitable foraging habitat is available adjacent to the development site and within the broader locality.
6)	modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline	The proposed action will remove 0.27 ha of vegetation, which includes seasonal foraging habitat for the Grey-headed Flying-fox. Grey-headed Flying-fox camps will not be removed or disturbed, and more suitable foraging and roosting habitat is available outside of the development site.
7)	result in invasive species that are harmful to a vulnerable species becoming established in the vulnerable species' habitat	The proposed action is unlikely to result in the establishment of an invasive species that is harmful to the Grey-headed Flying-fox.
8)	introduce disease that may cause the species to decline, or	Grey-headed Flying-fox are reservoirs for the Australian bat lyssavirus, Hendra Virus and Menangle virus, and can cause clinical disease and mortality in Grey-headed Flying-fox. The proposed action would not increase the incidence of this disease.
9)	interfere substantially with the recovery of the species.	A Draft National Recovery Plan for the Grey-headed Flying-fox was developed in 2017. The relatively small amount of foraging habitat to be removed is unlikely to substantially interfere with the recovery of this species.
Conclusion	Is there likely to be a significant impact?	No. The proposed removal of planted native and exotic vegetation is unlikely to have a significant impact on the Grey-headed Flying Fox for the following reasons: • Foraging habitat within the site is marginal and would provide seasonal foraging opportunities, at best. • Similar foraging habitat is abundant in the locality. • Roosting habitat was not identified within the study area and will not be impacted by the proposed development.