

23 May 2019 Our ref: 19SYD - 12900

The Australian Turf Club: CO – MostynCopper Group Suite 2, Level 8 60 Pitt Street, Sydney 2000

Attention: Emily Lynch

Dear Emily,

RE: Ecological Assessment – Randwick Racecourse, Alison Road, Randwick

Eco Logical Australia (ELA) was engaged by MostynCopper Group to undertake an ecological assessment for a development application located at Randwick Racecourse, Alison Road, Randwick. The proposal is a State Significant Development (SSD) under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act).

The project will require the removal of four juvenile *Magnolia longifolia* (Southern magnolia) from Randwick Racecourse (Figure 2 and Figure 3). In accordance with Clause 7.9(2) of the *Biodiversity Conservation Act 2016* (BC Act), an application for State Significant Development is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environmental Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.

Eco Logical Australia undertook a site inspection and made an assessment of impacts to biodiversity values. The development will result in the removal of four exotic trees that are situated in a lawn area. The development will not have a significant impact on biodiversity values as defined by s7.2 or s7.3 of the BC Act 2016. The development is not located on land mapped on the Biodiversity Values Map.

See attached Table 1 for additional analysis.

The proponent may therefore seek a waiver from the Department of Planning for the preparation of a Biodiversity Development Assessment Report.

Regards,

Rebecca Ben-haim Environmental Consultant

Table 1 Criteria to assess biodiversity under the BC Act and BC Regulation

Legislation Criteria	Discussion of values within subject site	
Biodiversity Conservation Act (Clause 1.5)		
2 a) Vegetation integrity – being 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;	Due to previous and current land management practices, vegetation and soil within the subject site had been highly modified or disturbed and lacks any natural resilience. Vegetation within the site is composed of exotic trees planted as landscape features on a modified parkland. The plants are not consistent with any remnant native vegetation community or listed Plant Community Type (PCT) in the BioNet Vegetation Classification. No Threatened Ecological Communities will be impacted. The trees requiring removal as part of the modification include four juvenile exotic species (<i>magnolia grandiflora</i>) (Southern magnolia) (Figure 3). These trees are not representative of any remnant PCTs that would have been present within the development and therefore their removal does not compromise the vegetation integrity of the site.	
b) Habitat suitability – being the degree to which the habitat needs of threatened species are present at the particular site;	Suitable habitat for threatened species is highly limited within the site. No habitat is available for any threatened flora species. No foraging habitat is available for any threatened fauna species. Considering the small amount of isolated exotic vegetation present the site does not contain sufficient foraging resources to sustain any threatened fauna species. No roosting habitat is available within the subject site for hollow-dependent threatened fauna species due to the absence of hollow-bearing trees. The human made structures present within the study area are modern and do not consist of potential roosting habitat for threatened micro bat species such as open roof crevices, culverts, bridges, railway tunnels or stormwater tunnels. The removal of the four exotic trees will not compromise habitat suitability for threatened species.	
Biodiversity Conservation Act (Clause 6.3)		
a) the impacts of the clearing of native vegetation and the loss of habitat	The proposed development will not impact on any native vegetation.	
(b) the impacts of action that are prescribed by the regulations.	Impacts of actions that are prescribed by the regulations are addressed below.	
Biodiversity Conservation Regulation (Clause 1.4)		
a) Threatened species abundance – being the occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	No threatened ecological communities were present within the site. The small amount of vegetation present is Urban Exotics and is not consistent with any listed Plant Community Type (PCT). No habitat was available for threatened flora species due to the high level of modification of vegetation and soils within the site. No threatened fauna species were observed within the site during the site survey. No foraging habitat is available to any fauna species.	
	Considering the lack of native vegetation present, the site does not contain sufficient foraging resources to sustain any threatened	

Legislation Criteria	Discussion of values within subject site	
	fauna species. No roosting habitat is available within the subject site for hollow-dependent threatened fauna species due to the absence of hollow-bearing trees.	
	The removal of four exotic trees will not affect threatened species.	
<i>b)</i> Vegetative abundance – being the occurrence and abundance of vegetation at a particular site;	Vegetation within the subject site is of very low abundance and biodiversity quality. The site is located wholly on land modified for the racecourse and associated public recreation. Vegetation within the site was composed of exotic planted trees. Vegetation within the site is not consistent with any remnant native vegetation communities and did not conform to any listed Plant Community Types (PCTs).	
c) Habitat connectivity – being the degree to which a particular site connects different areas of habitat of threatened species to facilitate movement of those species across their range:	Vegetation within the site is highly fragmented and does not contribute to habitat connectivity across the local landscape (Figure 1). Vegetation is limited to individual planted trees distributed through the site between buildings. Movement of threatened species across the site would be limited by the complete lack of vegetation connectivity and buildings.	
species across their runge,	The site does not provide any significant level of connectivity to facilitate movement of threatened species across their range.	
d) Threatened species movement – being the degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle;	The site contains minimal vegetation which is fragmented due to clearance for recreational activity. Movement for less mobile threatened fauna such as mammals across the site is highly unlikely due to existing development within the site. Opportunities for movement across the site for mobile threatened fauna including birds and bats are limited to small buildings and sparse vegetation. The site is not considered to be significant for the movement of any threatened species to maintain their lifecycle.	
e) Flight path integrity – being the degree to which the flight paths of protected animals over a particular site are free from interference; and	The landscape within and surrounding the site is mostly cleared of vegetation, with several small buildings present within the site and a lack of vegetation between them. The flight paths of protected animals over the site are unlikely to be further impacted by the proposed project. The removal of four exotic trees will not significantly affect flight paths of protected animals.	
f) Water sustainability – being the degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.	No natural water courses are present within the site. In its current state, the site is highly developed and does not contain water bodies or contribute to hydrological processes that sustain threatened species or ecological communities within or adjacent to the site. The removal of the four exotic trees will not impact on water quality, water bodies or hydrological processes.	
Biodiversity Conservation Regulation (Clause 6.1)		
 a) the impacts of development on the following habitat of threatened species or ecological communities: (i) karst, caves, crevices, cliffs and other geological features of significance, (ii) rocks, (iii) human made structures, 	The proposed development will not impact on any karst, caves, crevices, cliffs or any other geological features of significance, nor will it impact on any rocks. No human made structures, which may provide potential roosting habitat for threatened species, such as open roof crevices, culverts, bridges, railway tunnels or stormwater tunnels, are present within the study area. While the Southern Magnolia does provide flowering fruit, it is unlikely to provide potential foraging resources for threatened fauna species within the area due to the level of clearance. Due to the developed and cleared nature of the site, frequent recreational use and lack of vegetation, the study area is unlikely to support any threatened flora and fauna species.	

Legislation Criteria	Discussion of values within subject site
(iv) non-native vegetation	
(b) the impacts of development on the connectivity of different areas of habitat of threatened species that facilitates the movement of those species across their range,	Vegetation within the site is highly fragmented and does not contribute to habitat connectivity across the local landscape. Vegetation is limited to individual juvenile planted trees distributed through the site between buildings. Movement of threatened species across the site would be limited by the existing buildings and complete lack of vegetation connectivity. The site does not provide any significant level of connectivity to facilitate movement of threatened species across their range.
(c) the impacts of development on movement of threatened species that maintains their lifecycle,	The site contains minimal vegetation which is fragmented by cleared parkland. Movement for less mobile threatened fauna such as mammals across the site is highly unlikely due to existing development within the site. Opportunities for movement across the site for mobile threatened fauna including birds and bats are limited to small buildings and sparse juvenile plantings. The site is not considered to be significant for the movement of any threatened species to maintain their lifecycle.
(d) the impacts of development on water quality, water bodies and hydrological processes that sustain threatened species and threatened ecological communities (including from subsidence or upsidence resulting from underground mining or other development),	No natural water courses are present within the site. In its current state, the site is highly developed and does not contain water bodies or contribute to hydrological processes that sustain threatened species or ecological communities within or adjacent to the site. The removal of the eight juvenile exotic trees will not impact on water quality, water bodies or hydrological processes.
(e) the impacts of wind turbine strike on protected animals,	The development of wind turbines is not proposed within this development.
(f) the impacts of vehicle strike on threatened species of animals or on animals that are part of a threatened ecological community.	The site contains minimal vegetation which is fragmented by parkland and buildings and wholly cleared. Impacts of vehicle strikes on threatened species would therefore not increase as a result of the proposed development.



Figure 1: Location of the study area and vegetation communities within the locality (OEH, 2016)

Legend Study Area Cadastre Vegetation Communities (OEH 2016) Urban Exotic/Native 0 15 30 60 Metres Datum/Projection: GDA 1994 MGA Zone 56



Prepared by KS Date: 13/05/2019

Figure 2: Field validated vegetation within the study area (ELA 2019)



Validated Vegetation Communities (ELA 2019)

C Study Area Validated Vegetation Communities (ELA 2019) Urban Exotic





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Figure 3: Southern Magnolia trees present within the study area, proposed for removal