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Macquarie Data Centre IC3 State Significant Development: Response to City of Ryde Council Submission

Dear James,

The purpose of this letter is to respond to a submission made by the City of Ryde Council (Council) on the Biodiversity Development Assessment Report waiver request prepared by Cumberland Ecology (ref. 21116 – Let2, dated 19 August 2021) to support the State Significant Development of the Macquarie Data Centre IC3 located at 17-23 Talavera Road, Macquarie Park (the 'site'). Council's submission is provided below in italics, followed by our response.

Council Submission

Despite the extent of vegetation clearing outlined above, no assessment of the ecological impacts has been undertaken to demonstrate the proposal is acceptable with regards to impacts to flora and fauna on site. Whilst acknowledged the Planning Secretary of the Department of Planning, Industry and Environment has determined that the proposed development is not likely to have any significant impact on biodiversity values, and subsequently waived the requirement for a BDAR, it is maintained that insufficient information has been provided to determine what level of impact is to be imposed upon flora and fauna species.

Of particular note is the removal of Trees 36, 45, 47, 51, 54, 56, 62, 66, 71, 76, 77, 78, 119 & 121 which are of a species consistent with those listed under two Critically Endangered Ecological Communities (CEEC), being Blue Gum High Forest in the Sydney Basin Bioregion (BGHF) and Sydney-Turpentine-Ironbark Forest in the Sydney Basin Bioregion (STIF). Although the documentation provided asserts that site vegetation is likely to have been planted following land clearing works undertaken prior to 1943, it remains unclear what ecological value this planted, but well-established, CEEC vegetation holds.

Cumberland Ecology Response

Review of historical aerial imagery via the NSW Government 'Spatial Portal' shows that by 1943 the site was nearly completely cleared for agriculture, though some vegetation may have remained along the north-western boundary of the site. By 1971 all vegetation across the site had been cleared, and some of the current plantings appear to have been undertaken in the intervening period between then and 1986, in neat lines surrounding hard stand car parking areas. As the entire site has been cleared of historical vegetation which may have originally comprised either the BGHF or the STIF threatened ecological communities (TECs), there are no current ecological values present on the site pertaining to a remnant or regrowth occurrence of either TEC.

Some tree species are present which would naturally occur in either TEC, such as *Eucalyptus saligna* (Sydney Blue Gum) and *Angophora costata* (Smooth-barked Apple); however, these species have been planted for landscaping purposes in a matrix including non-indigenous native and exotic species. As such, there is no similarity between this landscaped vegetation and a natural occurrence of either TEC beyond that the vegetation contains some species that could occur in either TEC. However, the individuals of these species are of unknown provenance, and are likely to have been sourced from mass nursery stock which has the potential to either be of non-local provenance, or potentially from inbred nursery stock which may have an accumulation of deleterious recessive alleles. These trees are therefore unlikely to contribute to the retention of local genetic diversity of the species and have no ecological value beyond foraging habitat for local fauna species.

While the final determination for BGHF and STIF mention the community can persist as remnant trees over an exotic understorey, the value of these trees is described only in terms of ecological significance due to being persistent remnant trees, and as a source of genetic material to be used in rehabilitation plantings. Neither final determination states that planted trees of characteristic species (even if undertaken for revegetation versus landscaping purposes) conform to the listed communities. As the trees are landscape plantings, and not intentional revegetation plantings, and furthermore were from a time before provenance of plants in revegetation projects was considered important, the trees are very unlikely to contain local genetic diversity or have any particular ecological significance in terms of being associated with TECs. The ecological purpose they serve is therefore of no greater significance than any other garden plantings of native species. It is further noted that the species present within the site are commonly used in landscaping in Sydney and elsewhere in NSW.

Yours sincerely,

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