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Our ref: SSD-79316759

28 February 2025

Subject: Concept Proposal for Mixed-Use with Affordable Housing – 45-53 Macleay Street, Potts Point (SSD-79316759)– Request to waive requirement to prepare a Biodiversity Development Assessment Report

Dear Ms Hather,

I refer to your correspondence dated 10 February 2025, regarding the request to waive the requirement for a Biodiversity Development Assessment Report (BDAR) to be submitted as part of the above referenced State significant development (SSD) application.

Under section 7.9(2) of the Biodiversity Conservation Act 2016 (BCA):

“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.”

This letter is to confirm that the Secretary of the Department of Planning, Housing and Infrastructure has determined that the proposed development as described above is not likely to have any significant impact on biodiversity values and that a BDAR is therefore not required to accompany any application for development consent or infrastructure approval for the proposed development.

I, as Delegate of the Planning Secretary within the Development Assessment and Sustainability division have determined that the proposed development is not likely to have any significant impacts on biodiversity values. Evidence that the Delegate of the Secretary within the NSW Department of Climate Change, Energy, the Environment and Water (Director) has made the determination is attached (dated 26 February 2025).

If there are any amendments to the proposed development, a fresh request for a BDAR waiver determination will be required or a BDAR may need to be prepared.

Department of Planning, Housing and Infrastructure



Should you have any further enquiries, please contact Justin Keen on 02 9995 6588 or via email to justin.keen@dpie.nsw.gov.au.

Yours sincerely,

Keith Ng
Team Leader
Affordable Housing Assessments
Development Assessment and Sustainability
Department of Planning, Housing and Infrastructure

As delegate of the Planning Secretary

Encl: CPHR of NSW DCCEEW determination

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Monday, 10 February 2025

Request for a Biodiversity Development Assessment Report Waiver for a State Significant Concept Development Application at 45-53 Macleay Street, Potts Point NSW 2011 (SSD-79316759) (Final 1.1)

To whom it may concern,

As an Accredited Biodiversity Assessor, I am writing this letter to provide to the NSW Department of Planning in request of a Biodiversity Development Assessment Report (BDAR) Waiver with regard to sections 1.5, 7.3 and 7.9 of the *Biodiversity Conservation Act 2016* (BC Act) and clause 1.4 of the *Biodiversity Conservation Regulation 2017*.

On behalf of the applicant, I kindly request that you provide your confirmation whether you agree that there is no need to submit a Biodiversity Development Assessment Report (BDAR) for a State Significant Development (SSD) concept application for the proposed residential mix use development (including affordable housing) at 45-53 Macleay Street, Potts Point NSW 2011 (Lot 3/-/SP934) (the 'Subject Property'; **Figure 1**). The Subject Property occurs within the Council of the city of Sydney.

Development Overview

The proposed development involves demolition of the existing man-made building within the Subject Property and construction of a 13-storey mixed-use building comprising of residential living units and commercial use facilities at the Subject Property (Urbis 2024).

Existing Site

The Subject Property covers an area of approximately 0.13ha and is comprised of an existing 12-storey mixed use building and hard stand along with associated landscaping. The property has two street frontage; Macleay Street (east) and McDonald Street (north).

The vegetation within the Subject Property has been extensively altered through urban development, landscaping and infill planting, and consists of a mix of exotic and non-indigenous trees native, shrubs, and groundcovers. All vegetation present within the Subject Property is proposed to be removed and therefore impacted by the proposed development.

BDAR Waiver details

Section 7.9(2) of the Biodiversity Conservation Act 2016 (BC Act) stipulates 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. The authority of the 'Planning Agency Head' is required to determine whether a proposed development is "not likely to have any significant impact on biodiversity values" is usually delegated to Directors within the Planning Services Division."

In preparing this request for a BDAR Waiver, Land Eco have completed a desktop and site assessment of the native vegetation and threatened species habitat values within the Subject Property (PlantNET 2024; NSW DCCEEW 2024b).

In applying for a BDAR Waiver, we have completed the tables provided by the NSW Department of Planning and Environment (DPE 2018) in order to assess the significance of the impacts of the proposed SSD on biodiversity values (**Table 2, Table 3**).

Vegetation Within the Subject Property

The vegetation on the Subject Property has been historically cleared and constitutes primarily of planted exotic and non-indigenous native trees, shrubs and groundcovers. The vegetation (garden beds and lawns) occurring predominantly around the borders of the Subject Property, contain a mixed assemblage of exotic and non-indigenous native ornamental plants.

The majority of the trees and shrubs within the Subject Property are introduced species / commonly planted ornamentals that offer low habitat value within this highly modified, urbanised locality.

Owing to the degraded nature of the vegetation within the Subject Property as a result of historical clearing, infill planting and ongoing garden maintenance, the vegetation within the Subject Property represents low conservation value.

Threatened Species that may use Subject Property

The NSW Wildlife Atlas online survey tool (BioNet) (NSW DCCEEW 2024b) was used to obtain a list of threatened flora and fauna species previously recorded within a 10km radius of the Subject Property. There are no historical records of threatened fauna or flora within the Subject Property. The habitat requirements of each species were assessed and compared to what was observed by the Land Eco Ecologist within the Subject Property using aerial imagery and street view software.. A shortlist of species that may occur on the Subject Property and/or be impacted from the proposed development was produced (**Table 1**).

This shortlist was selected by excluding species from the BioNet search that were considered unlikely to use the Subject Property due to the absence of required habitat features or as a result of the degraded condition of the habitat within the Subject Property. The excluded species are believed to utilise more favourable habitat such as Royal Botanic Garden Sydney, Sydney Harbour National Park and Garigal National Park.

The Subject Property offers no marginal foraging habitat for species of flying fox such as the Grey-headed Flying-fox (*Pteropus poliocephalus*), however the species may occasionally flying over the Subject Property and may temporarily perch in the nearby trees. Flying-foxes are highly mobile and capable of moving significantly long distances during foraging bouts. There are no known records of roost camps for the Grey-headed Flying-fox within the Subject Property (DCCEEW 2024).

Birds of prey such as the Powerful Owl (*Ninox strenua*), White-bellied Sea-eagle (*Haliaeetus leucogaster*), Little Eagle (*Hieraaetus morphnoides*), Eastern Osprey (*Pandion cristatus*) and Square-tailed Kite (*Lophoictinia isura*), may occasionally fly-over the Subject Property, however, the habitat is highly degraded with low connectivity to remnant vegetation and no suitable breeding habitat (i.e. large eucalypts/hollow-bearing trees) occurs within the Subject Property. These species are highly mobile, and the Subject Property is not expected to form important foraging, roosting or breeding habitat, it is simply too urban and disturbed.

Locally occurring threatened microbat species listed in **Table 1** may occasionally forage within and fly over the Subject Property. It is considered likely that these locally occurring species may forage within the Subject Property and roost within some of the existing buildings, using open gutters and roofing cavities as entry points. Although, due to the limited canopy cover and disturbed urban locality, the Subject Property is unlikely to form important foraging habitat for these species. Suitable foraging and roosting habitat will continue to remain in the locality post-development.

Protected Species that may use the Subject Property

Open or cavernous parts of the existing buildings within the Subject Property may act as roosting habitat for common protected microbat species in the locality such as Gould's Wattle Bat (*Chalinolobus gouldii*). Microbat species, including threatened microbats, are known to utilise building cavities for habitat, however, the densely urbanised locality of this building makes it less suitable for utilisation by microbats.

The vegetation present within the Subject Property may provide foraging, roosting and breeding habitat for protected bird species in the locality. These protected species may subsequently be affected by the removal of vegetation and the demolition of buildings for the proposed development.

Table 1. Shortlist of threatened species that may use the Subject Property, produced by Land Eco, derived from a 10km BioNet search of the Subject Property's Area

Class	Scientific Name	Common Name	BC Act	Habitat usage
Aves	<i>Anthochaera phrygia</i>	Regent Honeyeater	Critically Endangered	Unlikely to occur. Avoids densely built-up, urban environments. Only occurs locally as a vagrant non-breeding visitor.
Aves	<i>Glossopsitta pusilla</i>	Little Lorikeet	Vulnerable	Unlikely to occur. Avoids densely built-up, urban environments. Only occurs locally as a vagrant non-breeding visitor.
Aves	<i>Haliaeetus leucogaster</i>	White-bellied Sea-eagle	Vulnerable	Occasionally may fly over and utilise the Subject Property to hunt for small prey. The Subject Property is however disturbed by roads and people and is unlikely to be used regularly. However, the Subject Property contains no remnant tall trees suitable for nesting.
Aves	<i>Hieraetus morphnoides</i>	Little Eagle	Vulnerable	Occasionally may fly over and utilise the Subject Property to hunt for small prey. The Subject Property is however disturbed by roads and people and is unlikely to be used regularly. However, the Subject Property contains no remnant tall trees suitable for nesting.
Aves	<i>Lathamus discolor</i>	Swift Parrot	Endangered	Unlikely to occur. Avoids densely built-up, urban environments. Only occurs locally as a vagrant non-breeding visitor.
Aves	<i>Lophoictinia isura</i>	Square-tailed Kite	Vulnerable	Occasionally may fly over and use the Subject Property to hunt small prey. The Subject Property is however disturbed by roads and people and is unlikely to be used regularly. It also does not contain suitable trees for nesting. Square-tailed Kites construct large nest on horizontal forks and branches of tall trees which are not found within or around the Subject Property.
Aves	<i>Ninox connivens</i>	Barking Owl	Vulnerable	Unlikely to occur. Avoids densely built-up, urban environments.
Aves	<i>Ninox strenua</i>	Powerful Owl	Vulnerable	There is a pair of Powerful Owl in Centennial Parklands, and individuals are occasionally observed in Hyde Park. They can forage anywhere there is tree cover in the locality, hunting for rats and possums. May on occasion use the Subject Property to hunt small prey. The tree canopies are too open to present a roosting opportunity but may provide temporary perching on occasion. The Subject Property contains no large hollows in mature trees and is too open and disturbed to be suitable for breeding or permanent habitation.
Aves	<i>Pandion cristatus</i>	Eastern Osprey	Vulnerable	Occasionally may fly over and utilise the Subject Property to hunt for small prey. The Subject Property is however disturbed by roads and people and is unlikely to be used regularly. However, the Subject Property contains no remnant tall trees suitable for nesting.
Aves	<i>Petroica phoenicea</i>	Scarlet Robin	Vulnerable	Unlikely to occur. Avoids densely built-up, urban environments. Only occurs locally as a vagrant non-breeding visitor.

Class	Scientific Name	Common Name	BC Act	Habitat usage
Aves	<i>Tyto novaehollandiae</i>	Masked Owl	Vulnerable	Unlikely to occur. Avoids densely built-up, urban environments.
Aves	<i>Tyto tenbricosa</i>	Sooty Owl	Vulnerable	Unlikely to occur. Avoids densely built-up, urban environments.
Mammalia	<i>Chalinolobus dwyeri</i>	Large-eared Pied Bat	Vulnerable	May on occasion fly over and forage around the tree canopies in the Subject Property. This species is unlikely to use the Subject Property's artificial structures as permanent roosting/breeding habitat.
Mammalia	<i>Falsistrellus tasmaniensis</i>	Eastern False Pipistrelle	Vulnerable	May on occasion use the Subject Property to forage but generally inhabits moist areas, with trees taller than 20m. The Eastern False Pipistrelle generally roosts in eucalypt hollows but has also been found under loose bark on trees or in buildings. While this species has also been recorded roosting within man-made structures such as large bridges and culverts, the buildings within the Subject Property are not highly suitable for this species.
Mammalia	<i>Micronomus norfolkensis</i>	Eastern Coastal Free-tailed Bat	Vulnerable	May on occasion fly over and forage around the tree canopies in the Subject Property. This species is unlikely to use the Subject Property's artificial structures as permanent roosting/breeding habitat.
Mammalia	<i>Miniopterus australis</i>	Little Bent-winged Bat	Vulnerable	May on occasion fly over and forage around the tree canopies in the Subject Property. However, Little Bent-winged Bats generally forage beneath the canopy of densely vegetated habitats and roost in limestone caves which are absent from the Subject Property. It is therefore unlikely that the Subject Property acts as an important foraging or roosting site.
Mammalia	<i>Miniopterus orianae oceanensis</i>	Large Bent-winged Bat	Vulnerable	May on occasion fly over and forage around the tree canopies in the Subject Property. This species is unlikely to use the Subject Property's artificial structures as permanent roosting/breeding habitat as this species primarily uses limestone caves.
Mammalia	<i>Myotis macropus</i>	Southern Myotis	Vulnerable	May on occasion fly over and forage around the tree canopies in the Subject Property. This species is unlikely to use the Subject Property's artificial structures as permanent roosting/breeding habitat.
Mammalia	<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox	Vulnerable	Occasionally may use the habitat to forage on nectar from flowering/fruiting trees. Unlikely to roost or breed within the Subject Property due to low habitat connectivity, low abundances of large native trees, and the highly disturbed and urbanised nature of the Subject Property and surrounding area.
Mammalia	<i>Saccolaimus flaviventris</i>	Yellow-bellied Sheath-tail-bat	Vulnerable	Occasionally may use the habitat to forage around tree canopies. This species is unlikely to use the artificial structures within the Subject Property as permanent roosting/breeding habitat. While this species has been

Class	Scientific Name	Common Name	BC Act	Habitat usage
				recorded roosting within man-made structures such as large bridges and culverts, the buildings are disturbed within the Subject Property and are not highly suitable for this species.
Mammalia	<i>Scoteanax rueppellii</i>	Greater Broad-nosed Bat	Vulnerable	May on occasion fly over and forage around the tree canopies in the Subject Property. This species generally roosts in tree hollows which are absent from the Subject Property. While this species has also been recorded roosting within man-made structures such as roofs of buildings, the buildings within the Subject Property are not highly suitable for this species.

From the information I have been provided by the applicant, to date, I anticipate the impacts of the proposed development will not adversely affect a local, viable population of any threatened species. I also anticipate that the proposed development will not impact upon any area of remnant or self-sown indigenous native vegetation.

Trees present within and adjacent to the Subject Property, are believed to be historically planted and consist mainly of exotic and non-indigenous native species commonly used in landscaping. Considering the origins of all of the vegetation on the Subject Property, and its current position in a highly modified, urban landscape (garden beds and road verges), it is not likely that this vegetation provides any importance for local biodiversity.

It is in my professional opinion that any impacts to the non-native vegetation, artificial structures and historically planted, 'native vegetation' on the Subject Property will be of little consequence, and as such a BDAR Waiver is a suitable path forward for this development.

In conclusion, it is in my professional opinion that the proponent, Time & Place Development Pty Ltd, should not be required to prepare a BDAR, and therefore I support the request by Time & Place Development Pty Ltd, for a BDAR Waiver to accompany this SSD.

Thank you.

Yours sincerely,



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References

Department of Planning and Environment (DPE) (2018) Biodiversity Development Assessment Report Waiver determinations for SSD and SSI applications [accessed 15/11/2024]

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NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) (2024b) NSW BioNet. The website of the Atlas of NSW Wildlife <http://www.bionet.nsw.gov.au/> [accessed 15/11/2024]

NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) (2024c) NSW Transitional native vegetation regulatory map viewer <https://www.lmbc.nsw.gov.au/Maps/index.html?viewer=NVRMap>

NSW WeedWise (NSW WeedWise) (2024) <https://www.dpi.nsw.gov.au/biosecurity/weeds> [accessed 15/11/2024]

PlantNET (2024) The NSW Plant Information Network System; 2020. Royal Botanic Gardens and Domain Trust, Sydney <https://plantnet.rbgsyd.nsw.gov.au> [15/11/2024]

Threatened Species Scientific Committee (TSSC) (2001) Commonwealth Listing Advice on *Pteropus poliocephalus* (Grey-headed Flying-fox) <https://www.dcceew.gov.au/environment/biodiversity/threatened/conservation-advice/pteropus-poliocephalus> [accessed 15/11/2024]

Urbis (2024) Scoping Report - 45-53 Macleay Street, Potts Point

Appendix



Figure 1. The Subject Property – 45-53 Macleay Street, Potts Point, NSW 2011 (Lot 3/-/SP934)

Table 2. Analysis of BDAR waiver request information required

Action	Details
Administration	This BDAR waiver was prepared by qualified Ecologist Sam Dreux (MZool) with 3+ years of experience in environmental assessment and reviewed by Principal Ecologist and Accredited Biodiversity Assessor (#BAAS18059) Kurtis Lindsay (BSc (Hons)) for Time & Place Chimes Development Pty Ltd for a State Significant Development (SSD-79316759)
Site Details	The Subject Property contains an existing 12-storey residential flat building comprising 80 studio apartments and associated car parking at 45-53 Macleay Street, (Lot 3/-/SP934), Potts Point (Figure 1). The Subject Property is located within the Council of the city of Sydney within land mapped as 'Land excluded from LLS Act' (NSW DCCEEW 2024c)
Proposed Development	The proposed development involves the demolition of the existing man-made building within the Subject Property and construction of a 13-storey (up to 50.05m) mixed-use shop-top housing development comprising three levels of basement car parking, ground floor retail and residential above. All vegetation proposed for removal on the Subject Property has been assessed by a qualified and experienced Ecologist (Table 3).
Impacts on Biodiversity Value	Impacts to Biodiversity Values were assessed by qualified and experience Ecologist Sam Dreux (MZool). Details of Biodiversity Value, their Meaning and Relevance and an explanation of the potential impacts are detailed in Table 3 .

Table 3. Analysis of Impacts of the Proposed Development on Biodiversity Values

Biodiversity Value	Meaning	Relevant (✓or N/A)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation
Vegetation abundance – 1.4(b) BC Regulation	Occurrence and abundance of vegetation at a particular site	✓	The proposed development avoids impacting upon areas of remnant native vegetation through its situation within a historically cleared urban matrix. Given that the vegetation is all historically planted, and the trees/shrubs are a mix of exotic and non-indigenous native species, the loss of this vegetation from an urban/industrial landscape in this context is not considered significant to the IBRA sub-bio region, or to any threatened species that may utilise the vegetation on occasion.
Vegetation integrity– 1.5(2)(a) BC Act	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.	✓	The Subject Property consists of hardstand and buildings with narrow garden beds planted with predominantly exotic trees, shrubs and groundcovers. The composition, structure and function of vegetation at the site and the surrounding landscape has been extensively altered due to historical clearing, landscaping, infill planting and ongoing garden maintenance, no longer representing a natural state. It currently represents low conservation value. The vegetation within the Subject Property is not representative of a plant community type or intact ecosystem. Replacement/enhancement planting of locally native species is recommended elsewhere on the Subject Property as a part of the proposed development to maintain the native biodiversity. There will be no significant impact upon the vegetation integrity of the Subject Property beyond its current state.
Habitat suitability - 1.5(2)(b) BC Act	Degree to which the habitat needs of threatened species are present at a particular site.	✓	The Subject Property does not provide important habitat to any threatened species. Threatened bird species listed in Table 1 such as raptors and owls may fly over and perch in tree on the margins

Biodiversity Value	Meaning	Relevant (✓ or N/A)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation
			of the Subject Property. Due to the limited number of trees and largely exotic vegetation, it is unlikely that the habitat within the Subject Property provides substantial foraging habitat for these species. The human disturbance and lack of hollow-bearing trees and habitat connectivity make it unlikely that the avian species mentioned in Table 1 would use the Subject Property to nest. In addition, any bird species that may utilise the Subject Property are highly mobile and can fly over the 'hostile matrix' of the City of Sydney without the need for substantial vegetation cover, and therefore would not rely on the trees proposed for removal to facilitate their movement. Grey-headed Flying-fox may intermittently fly over the Subject Property and perch in these trees during flowering/fruiting periods, however, these trees occur in low numbers and with poor habitat connectivity to more abundant patches of remnant, native vegetation of flowering trees and shrubs. It is unlikely that the trees and the habitat within the Subject Property would form an important foraging resource for the Grey-headed Flying-fox as this species is highly mobile and capable of moving significantly long distances during foraging. Suitable foraging habitat will remain in the locality post-development. It is not expected the Subject Property would form important roosting or breeding habitat for threatened species as the Subject Property is too open and disturbed. Locally occurring threatened microbat species listed in Table 1 may occasionally forage within and fly over the Subject Property. However, due to the limited canopy cover and disturbed urban locality, the Subject Property is unlikely to form important foraging habitat for these species. Suitable foraging and roosting habitat will continue to remain in the locality post-development, as such the local occurrence of these species will not be substantially impacted. No other threatened species are highly likely to use the habitat within the Subject Property.

Biodiversity Value	Meaning	Relevant (✓ or N/A)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation
Threatened species abundance - 1.4 (a) BC Regulation	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	✓	The proposed development will not significantly impact on the occurrence and abundance of threatened entities on the Subject Property or locality. Locally occurring birds of prey will likely only use the Subject Property sporadically due to low connectivity to remnant vegetation. Grey-headed Flying-fox will only use the Subject Property when their foraging trees are in flower/ fruiting. Grey-headed Flying-foxes are capable of nightly flights of up to 50 km from their roost to different feeding areas as food resources change (TSSC 2001) and therefore the loss of these feed trees is unlikely to cause a major impact on their local abundance. It is recommended that any replacement planting includes suitable nectar bearing indigenous trees to provide suitable habitat for these species. It is unlikely that the Subject Property forms important foraging habitat for threatened microbat populations listed in Table 1 given the urban locality and disturbed nature of the area. However, the demolition of buildings has the possibility of effecting locally occurring microbat species that may be roosting inside. Suitable foraging and roosting habitat will continue to remain in the locality post-development. The complete removal of vegetation and the demolition of buildings may minimally reduce the abundance of threatened species within the Subject Property. However, due to the low overall impact and isolation of the habitat within a hostile urban matrix, the overall value to these species is negligible.
Habitat connectivity – 1.4 (c) BC Regulation	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	N/A	The Subject Property has the potential to facilitate the movement of threatened species across their range. The Grey-headed Flying-fox and microbats may temporarily stop and forage in/around the ornamental trees. However, these species are highly mobile and can fly over the 'hostile matrix' of the City of Sydney without the need for cover, and therefore would not heavily rely on the trees proposed for removal for facilitated movement. The proposed development will not significantly impact on habitat connectivity. The vegetation within the Subject Property is an isolated patch of historically planted specimens. There is low habitat connectivity with natural areas.
Threatened species movement – 1.4 (d) Regulation	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	N/A	The proposed development will not significantly impact any threatened species' movement. Although, threatened species including the Grey-headed Flying-fox and Powerful Owl may temporarily forage in the Subject Property, these species do not rely on these trees within the Subject Property to facilitate their movement to maintain their lifecycle. These species are highly mobile.

Biodiversity Value	Meaning	Relevant (✓ or N/A)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation
Flight path integrity – 1.4 (e) BC Regulation	Degree to which the flight paths of protected animals over a particular site are free from interference	✓	There is the potential that the proposed development will interfere with 'flight paths' of some protected animals. Many protected animals including threatened species discussed in Table 1 such as the Grey-headed Flying-fox, microbats, and birds such as Raptors, and nectarivorous birds could potentially utilise flight paths over the Subject Property. Other protected species such as the Australian White Ibis are likely to use the locality. These species are generally widespread and adapted to urban areas with tall buildings. The building is proposed to be 50.05 metres tall (Urbis 2024). The proposed development will largely be in scale with the neighbouring building heights. The proposed development will not significantly impact on flight path integrity beyond its current state. Many of the species that may utilise this flight path including the Grey-headed Flying-fox (TSSC 2001) and microbat species are highly mobile and can change their movement patterns to avoid collisions with buildings.
Water sustainability 1.4 (f) BC Regulation	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.	N/A	There are no watercourses within the Subject Property. The proposed development will not significantly impact on water sustainability due to the low-lying, flat topography of the local area.



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