

20 May 2025

Our ref: 25SYD-10932

Bayswater by HSN Pty Ltd & The Trustee for Rebel Bayswater Trust  
Level 2, 10-12 Elizabeth Street  
Paddington, NSW 2021

Attention: Bridget Allen

Dear Bridget,

**Re: 164-172 & 174-194 William Street, Woolloomooloo – Biodiversity Development Assessment Report (BDAR) Waiver Request**

Eco Logical Australia Pty Ltd (ELA) was engaged by HSN Pty Ltd & The Trustee for Rebel Bayswater Trust (the proponent) to provide an assessment of biodiversity impacts associated for a proposed mixed use with in-fill affordable housing State Significant Development Application (SSDA) located at 164-172 & 174-194 William Street, Woolloomooloo (herein referred to as the 'study area'). The study area encompasses the Lot number and Deposited Plan (DP) Lot 52//DP 1049805 and Lot 1//DP816050 (Figure 1).

The SSDA is for the construction of a multi-storey mixed-use building featuring commercial, residential, retail spaces and basement parking. The Secretary's Environmental Assessment Requirement (SEARs) for the project (SSD-80211463) were issued on 21 February 2025. The proponent intends to submit a request to waive the requirement of a Biodiversity Development Assessment Report (BDAR).

State Significant Development (SSD) and State Significant Infrastructure (SSI) are regulated under the *Environmental Planning and Assessment Act 1979* (EP&A Act). The EP&A Act requires proponents to apply to the Minister of Planning for development consent of infrastructure approval, supported by an Environmental Impact Statement (EIS). These applications are also subject to biodiversity assessment requirements under the *Biodiversity Conservation Act 2016* (BC Act). The BC Act requires that an SSD or SSI application must be accompanied by a BDAR 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 is referred to as a BDAR waiver. This letter provides an assessment of the proposal's impact on biodiversity values, within the study area, in accordance with the NSW Department of Planning, Industry and Environment's (DPIE) 2019 guidelines under *How to apply for a biodiversity development assessment report waiver for a Major Project Application* (DPIE 2019). Information to support the application is outlined in Table 1 and Table 2 below.

The assessment includes a literature and database review of relevant information to assess the potential impacts to biodiversity values from the proposed development. This includes the review of the most recent vegetation mapping (NSW DCCEEW 2025a), BioNet Atlas threatened flora and fauna records within 5 km of the study area (NSW DCCEEW 2025b) and the Biodiversity Values Map (NSW DCCEEW 2025c).

The assessment confirmed that the study area is located within the highly disturbed urban environment of Sydney with no vegetation present on site. The study area encompasses two abutting commercial structures and concrete sidewalks. A small amount of exotic vegetation is present immediately adjacent to the study area within the public domain. The study area lacks important habitat features required for threatened species such as intact native vegetation and contains no suitable breeding or roosting habitat such as hollow bearing trees.

It was determined that no site inspection was required for the study area given the lack of biodiversity within the study area based on aerial imagery, the state of existing buildings and the wider context of the site. The potential for threatened species (including microbats) to utilise human-made structures for habitat has been considered in the context of the study area and the findings are detailed below. The buildings onsite have been subject to sustained, ongoing commercial use and a review of aerial imagery of the study area demonstrated that all existing buildings are well-maintained and in good condition. The existing buildings show no evidence of habitat for threatened species such as microbats. Based on the review of aerial imagery and street view imagery, no potential roosting habitat such as crevices or gaps were observed in the exterior walls or roofs of the buildings. Given the absence of remnant native vegetation, that the study area is located within a highly urbanised and disturbed environment, and that the buildings onsite are relatively modern, well-maintained and in good condition, it is unlikely that there is suitable habitat available within the study area to support threatened species (including microbats).

The assessment concluded that the proposed development is not likely to have a significant impact on biodiversity values. No Matters of National Environmental Significance (MNES) listed under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) are likely to be affected by the SSDA. The proponent requests a waiver from the need to submit a BDAR.

Regards,



Sam Oomens

Environmental Consultant

# 1. Biodiversity Development Assessment Report Waiver Request

## 1.1 Introduction

The following project description has been provided by HSN Pty Ltd & The Trustee for Rebel Bayswater Trust.

This BDAR Waiver Request is submitted to the Department of Planning, Housing and Infrastructure (DPHI) on behalf of HSN Pty Ltd & The Trustee for Rebel Bayswater Trust to support a SSDA for a mixed-use development containing residential, commercial and retail uses and public domains at 164-172 & 174-194 William Street (the study area). The proposed development includes:

- Site preparation, including ground excavation and the demolition of existing structures at the site.
- Construction of four (4) new mixed-use towers, which will accommodate:
  - Residential apartments, including affordable housing component.
  - Central publicly accessible park.
  - Retail and commercial floorspace.
- Basement levels with car parking facilities and plant rooms to service the proposed development.
- One (1) loading zone at the Lower Ground Level.
- Vehicle access from Dowling Street and Forbes Street.
- Associated building plant, utilities and service connections

## 1.2 Relevant Secretary’s Environmental Assessment Requirements

This BDAR waiver request will address the following biodiversity SEARs based on SEARs requirements for similar SSD applications. The SEARs are set out in Table 1 below.

**Table 1 Secretary’s Environmental Assessment Requirements relevant to this Report**

SEARS	Location in Report
<b>Section 8 Biodiversity</b> <ul style="list-style-type: none"><li>• Assess any biodiversity impacts associated with the concept development in accordance with the <i>Biodiversity Conservation Act 2016</i> and the Biodiversity Assessment Method 2020, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted or the site is on biodiversity certified land.</li><li>• If the concept development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.</li></ul>	ELA has prepared a BDAR waiver to address Section 8 of the SEARs. The Waiver is found in Table 3 of this report.

### 1.3 Site location and context

The development information requirements for a BDAR waiver request, in accordance with the BC Act 2016 (Section 1.5) and BC Regulation 2017 (Clause 1.4), are addressed in Table 2. Table 3 provides information regarding the impacts of the proposed development on biodiversity values in accordance with the Attachment B of the Guidelines (DPIE 2019).

**Table 2: BDAR waiver request information requirements**

Requirement	Information
Administration	<p><b>Project ID:</b> not yet provided</p> <p><b>Project name:</b> William Street Project</p> <p><b>Proponent:</b> HSN Pty Ltd &amp; The Trustee for Rebel Bayswater Trust</p> <p><b>Completed by:</b> Sam Oomens – Environmental Consultant (ELA), MSc. Environmental Science and Cornelia Ersson – Graduate Ecologist (ELA) – B.Sc. (Environmental Science) (Biology)</p> <p><b>Reviewed by:</b> Stacey Wilson – Associate Ecologist (ELA) BAM accredited assessor (BAAS22030) – B.Sc. Biodiversity and Conservation, Master Environmental Science (specialising in Environmental Science)</p>
Site Details	<p><b>Street Address</b> 164-172 &amp; 174-194 William Street, Woolloomooloo NSW (i.e. the study area)</p> <p><b>Lot and DP</b> The study area is located across the following Lot / DP:</p> <ul style="list-style-type: none"> <li>• Lot 52//DP1049805</li> <li>• Lot 1//DP816050</li> </ul> <p><b>Local Government Area (LGA)</b> Council of the City of Sydney</p> <p>The study area is currently zoned as MU1 (Mixed Use) under the <i>Sydney Local Environmental Plan 2012</i> (Sydney LEP) (Figure 1). The objectives of MU1 zoning are as follows:</p> <ol style="list-style-type: none"> <li><i>To encourage a diversity of business, retail, office and light industrial land uses that generate employment opportunities</i></li> <li><i>To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces</i></li> <li><i>To minimise conflict between land uses within this zone and land uses within adjoining zones</i></li> <li><i>To encourage business, retail, community and other non-residential land uses on the ground floor of buildings</i></li> <li><i>To ensure land uses support the viability of nearby centres</i></li> <li><i>To integrate suitable business, office, residential, retail and other land uses in accessible locations that maximise public transport patronage and encourage walking and cycling.</i></li> </ol> <p><b>Existing Development Site</b></p> <p>The study area is approximately 0.64 ha and contains two existing commercial structures, one of which is a vacant three storey commercial building and the other is multi-storey vehicle rental building in the Kings Cross District of Sydney (Figure 1).</p> <p>The study area is within the Kings Cross Precinct located approximately 1.4 km east of the Sydney Central Business District entry and approximately 230 m west of the Kings Cross Rail Station. A summary of the surrounding development is provided below:</p> <ul style="list-style-type: none"> <li>• <b>North:</b> The study area adjoins a mix of commercial and residential buildings to the north along Dowling Street and Forbes Street.</li> <li>• <b>East:</b> The study area is bounded by Dowling Street to the east.</li> <li>• <b>South:</b> The study area adjoins William Street on the south, providing east-west access to the Sydney CBD.</li> <li>• <b>West:</b> The study area is bound by Forbes Street to the west.</li> </ul> <p><b>Location Map:</b> An aerial location map is presented in Figure 1.</p>

Requirement	Information
	<p><b>Biodiversity</b></p> <p>A review of historical aerial imagery shows that no vegetation has been present within the study area since at least the 1940's. As such, no field survey was proposed. The study area comprises a wholly developed site with no vegetation present within its boundaries, except for small amounts of exotic tree canopy overhanging from the adjacent street trees.</p> <p>Immediately adjacent to the study areas southern, northern, eastern and western boundaries, within the public domain are a number of exotic street trees. The study area is not mapped under the Biodiversity Values Map (accessed 8 May 2025) (NSW DCCEEW 2025a) (Figure 2). There are no native Plant Community Types (PCT) mapped within the study area (NSW DCCEEW 2025b) (Figure 3). The study area is located next to a high traffic road within a heavily modified area of Sydney with limited surrounding Biodiversity value (Figure 1).</p> <p>An assessment of biodiversity values is provided in Table 3 of this report.</p> <p><b>Historical Context</b></p> <p>The earliest historical imagery accessed via the NSW Historical Imagery viewer (Spatial Services 2024) shows that in 1943 the study area was fully developed and contained mostly residential row houses, with no vegetation visible within or in proximity to the study area (Figure 4). There were no significant changes to the study area until sometime between 1965 and 1970, with aerial imagery showing that several residential buildings were removed (Figure 5). It appears that the buildings within the study area have remained largely unchanged since then. The study area has consistently been devoid of vegetation since the 1940's and likely earlier.</p> <p><b>Site Plan:</b> The architectural concept plans illustrating the proposed layout (at ground level) of the building is presented in Figure 6 (fjc studio, 2025).</p>
Proposed Development	This letter refers to the proposed development of 164-172 & 174-194 William Street. The proposal is for the demolition of existing buildings and development of four (4) mixed-use commercial and residential buildings. A description of the proposed works is provided in Section 1.1 above.

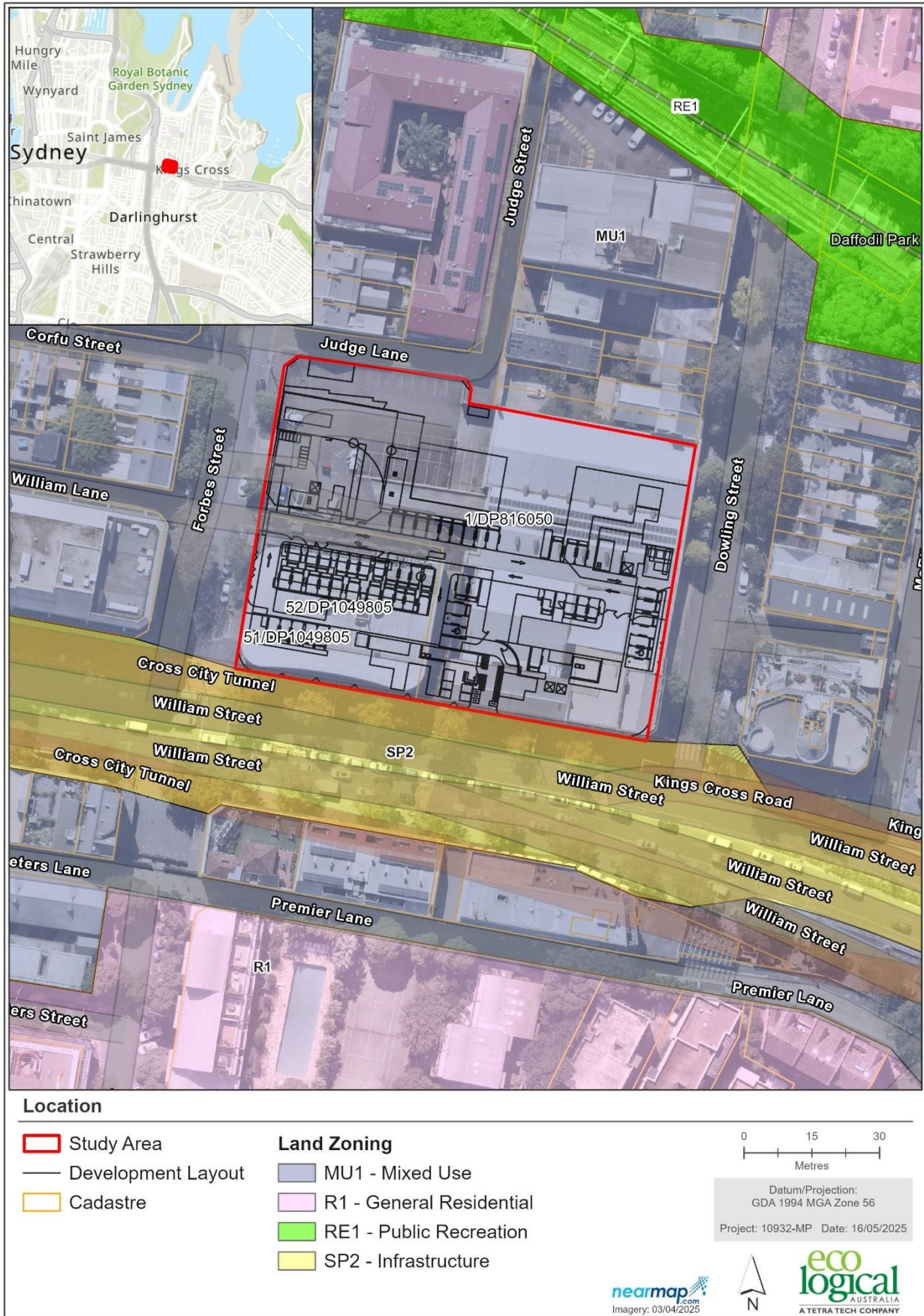


Figure 1: Location and land zoning of the proposed development.



Figure 2: NSW DCCEEW Biodiversity Values mapped within 2 km of the study area (NSW DCCEEW 2025a)



Previous Vegetation Mapping (NSW DCCEEW SVTM 2024)

Study Area

**Plant Community Types**

- PCT3040 - Sydney Coastal Foreshores Gully Rainforest
- PCT3594 - Sydney Coastal Sandstone Foreshores Forest
- PCT3812 - Sydney Coastal Sandstone Headland Heath
- PCT4091 - Grey Mangrove-River Mangrove Forest

0 500 1,000  
Metres

Datum/Projection:  
GDA 1994 MGA Zone 56  
Project: 10932-MP Date: 16/05/2025



Figure 3: Plant Community Types (PCT) mapping within the vicinity of the study area (NSW DCCEEW 2025b)



Figure 4: 1943 aerial imagery of the study area (Spatial Services 2025)



Figure 5: 1971 aerial imagery of the study area (Spatial Services 2025)



**Table 3: Criteria to assess biodiversity under the BC Act and BC Regulation**

Biodiversity Value	Meaning	Relevant? (✓ or N/A)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation Attach additional supporting documentation where appropriate
Vegetation abundance - 1.4(b) BC Regulation	Occurrence and abundance of vegetation at a particular site	✓	<p>The study area comprises a wholly developed site with no vegetation present within its boundaries, except for small amounts of exotic tree canopy overhanging from the adjacent street trees (Figure 3).</p> <p>Immediately adjacent to the study areas southern, northern, eastern and western boundaries, within the public domain, are 13 street trees of what appears to be exotic <i>Platanus × acerifolia</i> (London Plane) with a ground cover of <i>Liriope muscari</i> (Lily turf) (Figure 7). The study area does not contain any mapped PCTs or remnant native vegetation community (NSW DCCEEW 2024b) (Figure 3). A review of historic aerial imagery clearly demonstrates that the study area has been subject to repeated development and has predominately existed as hardstand surface, with scattered patches of vegetation since 1943 (Figure 4). The study area is disconnected from other patches of mapped native vegetation within the area. The closest patch of mapped native vegetation is PCT 4091 – Grey Mangrove-River Mangrove Forest and PCT 3594 – Sydney Coastal Sandstone Foreshores Forest, approximately 1.9 km away to the northeast of the study area (Figure 3).</p>
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.	N/A	<p>A review of historical imagery of the study area shows that the study area has maintained residential and commercial development from at least 1943.</p> <p>Due to previous and current development of the study area, vegetation and soils have been highly modified, disturbed or removed. No remnant native vegetation or previously mapped PCTs occur within the study area nor in the surrounding landscape (Figure 3). The exotic vegetation present immediately adjacent to the study area is planted in restricted areas within a highly modified environment.</p> <p>Any presence of regenerating native vegetation within the study area is highly unlikely given that the study area is disconnected from other patches of intact native vegetation, and has been subjected to intensive development, disturbance, and soil modification. As such, the development would not compromise vegetation integrity as no remnant vegetation or regenerating native vegetation will be affected.</p>
Habitat Suitability 1.5(2)(b) BC Act	Degree to which the habitat needs of threatened species are present at a particular site	N/A	<p>Given that the study area contains no vegetation and entirely exist as hardstand surfaces, it is highly unlikely to contain any significant habitat for threatened species.</p> <p>No threatened flora species have previously been recorded within the study area (NSW DCCEEW 2025c) (Figure 8<b>Error! Reference source not found.</b>). Soils within the study area have been highly modified due historical development of the surrounding area, such that any native soil seedbank that would have existed is likely to have been replaced with fill or concrete hardstand. The study area is therefore highly unlikely to provide habitat for any threatened flora species or native flora seed.</p> <p>No threatened fauna species have previously been recorded within the study area (NSW DCCEEW 2025c) (Figure 8<b>Error! Reference source not found.</b>).</p>

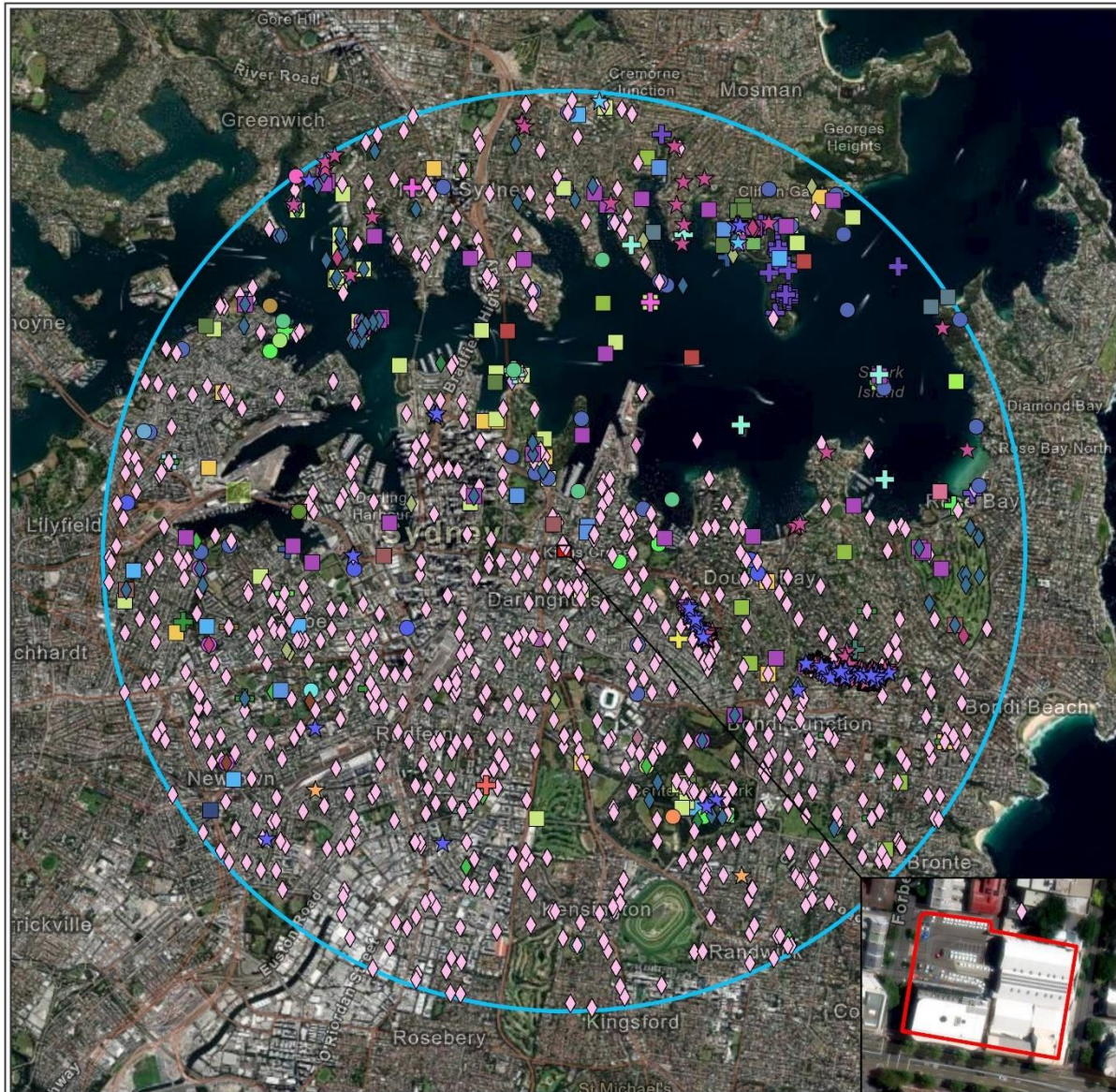
Biodiversity Value	Meaning	Relevant? (✓ or N/A)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation Attach additional supporting documentation where appropriate
			<p>The exotic vegetation immediately adjacent to the study area have a limited potential to provide marginal habitat for highly mobile fauna species such as birds and bats, to shelter and forage opportunistically. This includes <i>Pteropus poliocephalus</i> (grey-headed flying-fox) and threatened microbat species including <i>Saccolaimus flaviventris</i> (yellow-bellied sheath-tail-bat) which have been recorded within close proximity of the study area (Figure 8 <b>Error! Reference source not found.</b>). This exotic vegetation may only represent marginal habitat for these species and would unlikely be relied upon given the absence of other suitable habitat, remnant native vegetation cover, connective habitat and being located in a highly modified environment. The exotic vegetation would also not provide any suitable habitat for less mobile threatened species.</p> <p>The study area has no potential to provide roosting or nesting habitat for threatened species in the form of native canopy species. Due to the lack of vegetation and high disturbance occurring within the landscape, it is highly unlikely the study area would be utilized as breeding habitat by threatened fauna species for extended periods of time.</p> <p>A review of aerial imagery of the study area found no potential microbat roost such as crevices or gaps in the exterior walls and roofs of the manmade structures (building). The buildings are not derelict in nature; they are in good condition and are in current use, and they are located in a highly urbanised area, adjacent to highly trafficked roads and train lines. The study area also lacks native vegetation cover. Therefore, the study area was determined to not meet the habitat requirements of threatened species, including microbat species.</p>
<b>Threatened Species Abundance</b> <b>1.4(a) BC Regulation</b>	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	N/A	<p>There are no Threatened Ecological Communities (TECs) present within the study area. The study area contains no vegetation, except for small amounts of exotic tree canopy overhanging from the adjacent street trees existing in the public domain. The study area is currently fully developed and contains two large buildings with no PCTs recorded in previous mapping (Figure 2). The study area has remained cleared of native vegetation and developed since 1943 (Figure 4).</p> <p>There are no BioNet (NSW Atlas of Wildlife) records of threatened flora within or within the vicinity of the study area (Figure 8 <b>Error! Reference source not found.</b> <b>Error! Reference source not found.</b>) (NSW DCCEEW 2025c). No habitat was available for threatened flora species with the study area. The study area lacks remnant native vegetation, resulting from a history of disturbance, development and modification of soil profile. It is therefore highly unlikely that threatened flora would occur within or near the study area given no suitable habitat is available due to the urban context of the study area.</p> <p>There are no BioNet (NSW Atlas of Wildlife) records of threatened fauna species recorded within the study area (Figure 8 <b>Error! Reference source not found.</b>) (NSW DCCEEW 2025c). There are numerous records of grey-headed flying-fox within a 5 km radius of the study area and a close previous record approximately 15 m to the north of the study area (Figure 8 <b>Error! Reference source not found.</b>). This is a highly mobile species which relies on large flowering and fruiting trees, particularly <i>Ficus</i> and myrtaceous species, for foraging and roosting (DAWE 2021). No such habitat is available</p>

Biodiversity Value	Meaning	Relevant? (✓ or N/A)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation Attach additional supporting documentation where appropriate
			<p>within the study area nor within close proximity to the study area. While grey-headed flying-foxes are known to also utilise exotic vegetation for supplementary feeding and roosting, the vegetation around the perimeter of the study area does not comprise of the preferred exotic species which have found to be <i>Cinnamomum camphora</i> (camphor laurel), <i>Celtis</i> spp. (hackberry), <i>Ligustrum</i> spp. (privet), <i>Cocos nucifera</i> (cocos palm) and <i>Psidium</i> spp. (guava) (DAWE 2021). The nearest active grey-headed flying-fox camp is located in Centennial Park approximately 3.3 km to the southeast of the study area. Better quality foraging and roosting habitat for this species exists within the wider area further reducing the likelihood of occurrence within the study area.</p> <p>A review of aerial imagery of the study area demonstrates that the existing buildings are well maintained and in good condition (Figure 9 - Figure 12). The existing buildings show no evidence of habitat for threatened species such as microbats. The nearest threatened microbat species records are from Yellow-bellied Sheath-tail-bat, approximately 260 m north of the study area (Figure 6). Yellow-bellied Sheath-tail-bats primarily roost in tree hollows but have also been found to roost in buildings (OEH 2019). There is also one previous record of <i>Miniopterus orianae oceanensis</i> (Large Bent-winged Bat) within 1 km of the study area (Figure 8 <b>Error! Reference source not found.</b>). This species relies on caves for roosting habitat, but may also use derelict mines, stormwater tunnels, building and other manmade structures (OEH 2019). All other threatened microbat records are more than 1 km from the study area. The study area does not contain hollow bearing trees, caves, mines, or suitable tunnels or culverts. No potential roosting habitat such as crevices or gaps were observed in the exterior walls and roofs of the building in the imagery. Given the absence of remnant native vegetation, that the study area is located within a highly urbanised and disturbed environment, and that the building on the site is relatively modern and maintained, it is highly unlikely that threatened microbats occur within the study area.</p>
<b>Habitat Connectivity</b> <b>1.4(c) BC Regulation</b>	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	<p>There is no vegetation within the study area and is located within a highly fragmented and developed urban area in North Sydney. The study area does not contribute to habitat connectivity across the local landscape and is surrounded by major roads, multi-storey buildings and is not connected to areas of intact native vegetation. As such, the study area provides very limited connectivity to facilitate the movement of threatened species across their range.</p> <p>Replacement plantings of any native vegetation removed will help to provide a very small degree of habitat.</p>
<b>Threatened Species Movement</b> <b>1.4(d) BC Regulation</b>	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	N/A	<p>The lack of vegetation within the subject site provides no suitable breeding habitat or habitat that is critical to maintaining the life cycle of any threatened species. Movement for less mobile threatened fauna, such as mammals (excluding bats) across the study area is highly unlikely due to major roads, dense array of buildings and lack of connective vegetation within the landscape. There are some limited opportunities for movement around the study area for more mobile threatened fauna including birds and bats due to the presence of limited canopy vegetation</p>

Biodiversity Value	Meaning	Relevant? (✓ or N/A)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation Attach additional supporting documentation where appropriate
			<p>approximately 25 m north along Dowling Street, as well as trees along the public domain. However, this limited extent of planted native and exotic vegetation is a very small component of a larger matrix of urban vegetation but is unlikely to be relied upon by any threatened species.</p> <p>No field survey was undertaken to identify potential microbat habitat within the study area. A review of existing mapping was undertaken and given the state of the structures and known activities within the site; it was determined that no field survey was necessary. No high-potential roost habitat or suitable breeding habitat (e.g., caves, culverts, bridges) was identified within the buildings based on existing imagery of the study area.</p> <p>Removal of the buildings and construction of new buildings is unlikely to increase vehicle strikes or limit the movement of microbats, and other highly mobile threatened species such as birds or grey-headed flying-foxes given the proposed building will occur in an area which already contains buildings.</p> <p>The indicative ground floor landscape plans (Figure 6) for the development will likely include planted trees which may assist to facilitate movement of fauna species and aid in connectivity.</p>
<b>Flight Path Integrity</b> <b>1.4(e) BC Regulation</b>	Degree to which the flight paths of protected animals over a particular site are free from interference	N/A	The proposed development is within an existing built environment of Sydney, which features a dense configuration of medium and high-rise buildings and several residential dwellings. Protected animals are unlikely to rely on the limited extent of planted exotic and planted native vegetation identified in proximity to the study area along their flight path. Seven threatened microbat species have been recorded within a 5 km radius of the study area, and Yellow-bellied Sheathtail-bat and Grey-headed Flying Fox, have been recorded within close proximity (15-260 m) of the study area (Figure 8Error! Reference source not found.). These species are highly mobile and are likely to move throughout the locality in multiple directions. Given that the proposed mixed-use building will be of a height consistent with other buildings in proximity to the study area, it is unlikely that it would have a significant effect on the flight path of these species, or any other protected species. These species are likely to move within the landscape in multiple directions and are unlikely to solely rely on a flight path over the land where the mixed-use building is proposed. The proposal is unlikely to affect flight paths nearby, considering existing buildings adjacent to the study area and available habitat in the greater surrounding landscape.
<b>Water Sustainability</b> <b>1.4(f) BC Regulation</b>	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site	N/A	The study area is high disturbed. There are no natural watercourses or other water bodies present within the study area. The proponent will design the proposal with adequate stormwater management measures. The development would not alter water quality as a result of runoff or other processes that would impact or sustain threatened species or ecological communities within or adjacent to the study area. No hydrological processes exist within the study area itself that would support threatened species or ecological communities



Figure 7: Example of the exotic street trees of *Platanus × acerifolia* (London Plane) immediately adjacent to the study area



### Threatened Species Records (NSW DCCEEW BioNet 2025)



Figure 8: Threatened fauna and flora BioNet records within a 5 km buffer of the study area (NSW DCCEEW 2025c)



Figure 9: A view of the study area from the south west (on the corner of William Street and Forbes street).



Figure 10: A view of the study area from the south (on William Street), showing the two commercial buildings present.



Figure 11: A view of the study area from the west (on Forbes Street).

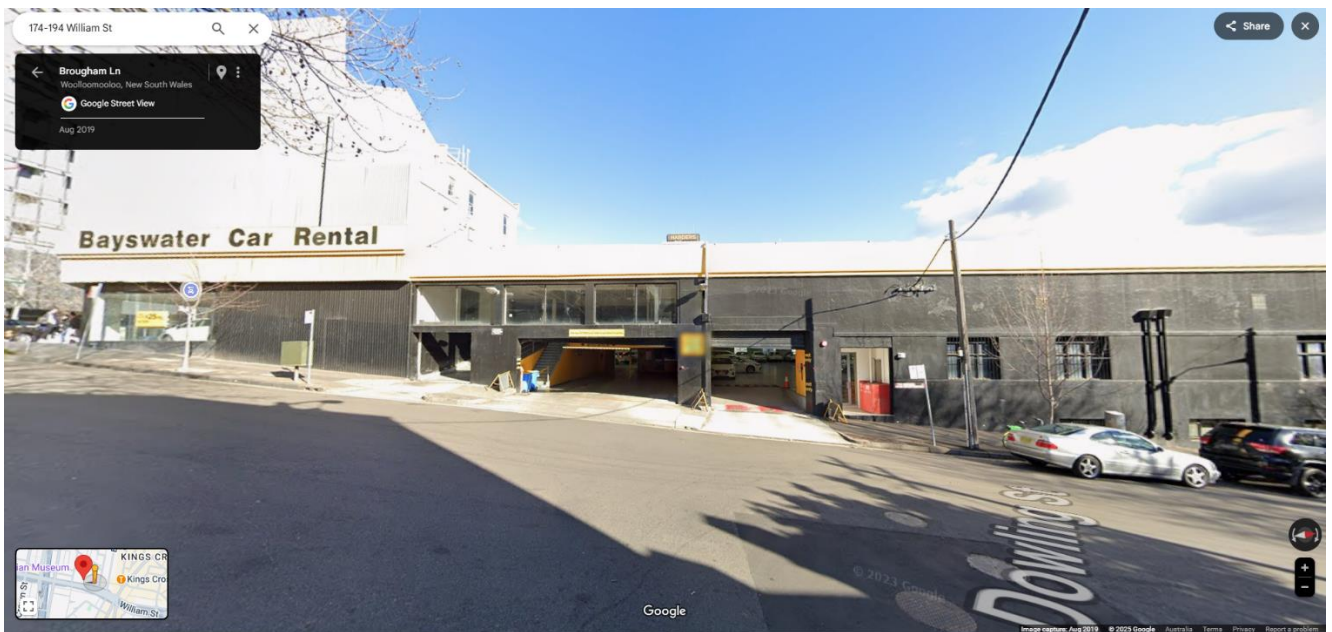


Figure 12: A view of the study area from the east (on Dowling Street).

## References

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