



BIODIVERSITY DEVELOPMENT ASSESSMENT

REPORT (BDAR)

FOR

PROPOSED TRANSIT-ORIENTATED

DEVELOPMENT AT 19 - 25 BALFOUR STREET,

LINDFIELD, NSW, 2107

PREPARED FOR:

Balfour Group Pty Ltd

2nd June 2025

ACS Environmental Pty Ltd

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CURRENCY OF BIODIVERSITY DEVELOPMENT ASSESSMENT REPORT

I, Josie Drevon, certify that this Biodiversity Development Assessment Report (BDAR) has been prepared on the basis of the requirements of (and information provided under) the biodiversity assessment method and submitted to the consent authority on the 2nd June 2025

The relevant application is for the proposed Transit-orientated Development at 19- 25 Balfour Street, Lindfield, NSW, 2107

Signed:

A handwritten signature in black ink, appearing to read 'J Drevon', written over a faint horizontal line.

Dated: 2nd June 2025

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GLOSSARY AND ACRONYMS

APZ	Asset Protection Zone
BAM	Biodiversity Assessment Method (2017) - supports the BC Act (2016)
BC Act	Biodiversity Conservation Act (2016) - legislation enacted in August 2017
BV Map	Biodiversity Values Map
CCPD	Crown Canopy Projective Density (DEC 2002)
CEEC	Critically Endangered Ecological Community
CRA	Conservation Risk Assessment
DCCEEW	Commonwealth Department of Climate Change, Environment, Energy and Water
DEC	State Department of Environment and Conservation
DPE	Department of Planning and Environment
DPI	Department of Primary Industries
E (threatened species status)	Endangered species
EEC	Endangered Ecological Community as listed by the BC Act and EPBC Act
EMA	Effluent Management Area
EPA Act	Environment Protection Act
EPBC Act	Environmental Protection & Biodiversity Conservation Act (1999). Enacted to protect and manage nationally and internationally (migratory) flora, fauna and ecological communities, defined in the Act as matters of national environmental significance (NES)
Habitat	areas occupied, either territorially, periodically or occasionally, by a species, population or ecological community
HTW	High Threat Weed
IPA	Inner Protection Zone
KTP	Key threatening process, a process that threatens the survival, life cycle, abundance or potential evolutionary development of native species, populations or ecological communities (Dept of Environment and Conservation 2004). KTP's are listed under the BC Act and the EPBC Act.
Migratory species	Listed under the EPBC Act and relating to international agreements to which Australia is a signatory. Includes the Japan-Australia Migratory Bird Agreement (JAMBA), China-Australia Migratory Bird Agreement (CAMBA) Republic of Korea Migratory Bird Agreement (ROKAMBA)
OEH	State Office of Environment and Heritage
OPA	Outer Protection Zone
PCT	Plant Community Type identified as such using the Bionet Vegetation Classification system (OEH 2018)

RoTAP	Rare or Threatened Australian Plants
SRZ	Structural Root Zone
Threatened species, populations or ecological communities	Entities listed by the BC Act and EPBC Act as 'Vulnerable to decreasing population growth in time', Endangered as population growth decreasing rapidly leading to eventual extinction' or 'Critically Endangered, a more extreme rate of population decrease than the former'.
SSDA	State Significant Development Application
ToD	Transit-orientated Development
TPZ	Tree Protection Zone
TSC Act	Threatened Species Conservation Act
V (threatened species status)	Vulnerable

EXECUTIVE SUMMARY

This Biodiversity Development Assessment Report (BDAR) has been prepared by ACS Environmental Pty Ltd on behalf of *Balfour Group Pty Ltd* to accompany a State Significant Development Application (SSDA) for a proposed residential flat building (including in-fill affordable housing) at 19 – 25 Balfour Street, Lindfield, within the Ku-ring-gai Local Government Area (LGA).

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-82709458) on 22 April 2025.

This report concludes that the proposed residential flat building is suitable and warrants approval subject to the implementation of the following mitigation measures:

- The works are wholly contained within the property boundaries of the subject site including laydown of materials and equipment in a staged development
- Bats must be surveyed in roof cavities and under eaves etc to determine which species are present in buildings before demolition, during demolition, roofs must be dismantled in evenings when bats are likely foraging and not roosting in roof cavities
- Landscaping should include up to 80% of native tree, shrub, forb and grass species that are representative of PCT 3262, Sydney Turpentine Ironbark Forest, to enhance the native vegetation component of the locality, which in turn would increase potential roosting and foraging habitat for native fauna occurring in the locality

Following the implementation of the above mitigation measures, the remaining impacts are considered appropriate.

The Vegetation Integrity Score (VIS) of the highly modified (degraded) vegetation recorded and sampled at the subject site was calculated to be 3, a score too low to generate any Plant Community Type Credits, and as such, No Biodiversity Offsets are required for this proposal.

1 INTRODUCTION

1.1 Proposed development

Biodiversity Development Assessment Report (BDAR)

In April 2025, ACS Environmental Pty Ltd was commissioned by The Balfour Group Pty Ltd to survey for flora and fauna and undertake a biodiversity impact assessment (BDAR) for an SSDA for a proposed Transit-orientated infill housing development (ToD) to occur at 19 - 25 Balfour Street, Lindfield.

Relevant Item	Detailed descriptions
Administration	- Proponent Name: Balfour Group Pty Ltd Contact details: +61 403 695 563 Applicant: Balfour Group Pty Ltd Local Contact: Aries Xu Contact details: +61 403 695 563 - Project ID: Application No. SSD-82709458 - Names and qualifications of persons completing this report. Person 1 - Mr Peter Stricker (BSc Hons Syd Uni); 35 years ecological impact assessment experience (Director and Principal Ecologist ACS Environmental P/L); Practising Member Ecological Consultants Association NSW Inc; ACS Environmental is an accredited Animal Research Establishment certified by the NSW Dept of Primary industries Person 2 - Ms Josie Drevon (Grad. Dip. (UNSW)) [□] [#] [^] [□] Member Ecological Consultants Association NSW Inc [#] Accredited Biodiversity Assessment Assessor (Biodiversity Conservation Act 2016) – (Accreditation Number BAAS24033) [^] Scientific Biodiversity Conservation Act Licence (SL102855)
Site Details	- Street Address: 19 - 25 Balfour Street, Lindfield, NSW, 2071 LGA: Ku-ring-gai Council LGA. - Description of existing site - all the combined allotments will be cleared for the proposed development, a total land area of 4,771m² or 0.477ha

SSDA for residential apartment building including affordable housing

Specifically, the SSDA seeks development consent for a proposed residential flat building, including in-fill affordable housing at 19 – 25 Balfour Street, Lindfield. The proposed works include demolition of existing structures, site preparation works, excavation and construction of the building and associated landscaping works.

The SSDA seeks development consent for:

- demolition of existing buildings and structures on site
- construction of a ten-storey residential flat building featuring:
 - basement level car parking
 - approximately 71 market residential units
 - approximately 27 affordable housing units
- associated landscaping works, including a communal open space.
- associated infrastructure and services

The proposal incorporates 17% affordable housing pursuant to Chapter 2, Section 15C and Chapter 5, Section 156 of the Housing SEPP. The proposal seeks to utilise the incentive controls under Chapter 2, Part 2, Division 1, Section 16 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) to achieve 30% additional building height and floor space ratio (FSR).

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) dated 22 April 2025 (SSD-82709458). This report has been prepared to respond to the SEARs requirement issued below.

Issue and Assessment requirements (SEARS)

Item	Description of requirement	Section reference (this report)
Item 16. Biodiversity	Unless a waiver has been granted, provide a Biodiversity Development Assessment Report (BDAR) that assesses any biodiversity impacts associated with the development in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020	The entire report addresses and assesses the potential impacts on biodiversity resulting from the proposed development at the subject site

Property details

19-25 Balfour St is located in a long-established urban setting on a quiet street in Lindfield, on the northern suburbs of Sydney.

The 4 properties at 19 - 25 Balfour Street, Lindfield, have a total land area of 4,771m² or 0.477ha.

The property details are as follows:

Street number	19	21	23	25
Lot Number	12	1	13	13
DP Number	654363	121527	657173	663524

Vegetation comprising the landscape

The canopy of the mostly exotic and non-locally occurring native vegetation occurring on the subject land is comprised largely of semi-mature to mature trees to about 12m in height of species including Jacaranda, Magnolia, Northern Bangalow Palm, Chinese Hackberry, Orange Jessamine, Wild Banana etc (Scales 2025).

Common smaller exotic tree, shrub and ground cover species occurring in the general understorey canopy include Agapanthus, Camellia, Begonia, Abelia, Jasmine, Creeping Fig, Dietes, Philodendron, Kentia Palm, Hydrangea, Clivia etc.

The vegetation mapping indicates that PCT 3626 'Sydney Turpentine Ironbark Forest' (DCCEEW 2025) was the most likely ecological plant community that occurred at the subject site before mature native trees such as Blue Gum and Turpentine had died (Scales 2025). The TPZ's of neighbouring trees, including Sydney Blue Gum and Sydney Red Gum, which are a component of PCT 3262 that occur in Nos. 17 Balfour Street, Lindfield, and in Nos. 10 and 14 Highfield Road, Lindfield, do not encroach into the development footprint, such that impacts to living trees comprising PCT 3262 do not occur.

Currently PCTid = 0 is the plant community type that best describes the landscaped vegetation at the subject site.

Figure 1 is a diagram indicating the location of the subject site in the Sydney region (Nearmap 2025).

Figure 2 is a locality aerial image of the subject site (blue marker) and surrounds in relation to landscapes and current urbanisation (Nearmap 2025).

Figure 3 is an aerial image of the subject site at Balfour Street, Lindfield, indicating the long-established, urbanised landscaped vegetation occurring at the subject site.

Figure 4 is a schematic image of the development footprint indicating that the TPZ's of trees occurring in neighbouring properties are not impacted by the proposed development (Giles tribe 2025).

Figure 5 is a schematic image of the south elevation of the proposed apartment towers (Giles Tribe (2025)

Figure 6 is a schematic image of the proposed development area, indicating tree numbers within and outside the development footprint (from Naturally Trees 2025).

Figures 7, 8, 9 & 10 indicate typical established landscaped urbanised vegetation occurring in well managed gardens occurring in front yards, along the side fence-lines and in rear yards of the four subject properties.

Very few native species occur throughout the subject areas, the location of these, including mostly forbs, ferns and grasses are depicted in Figure 11.

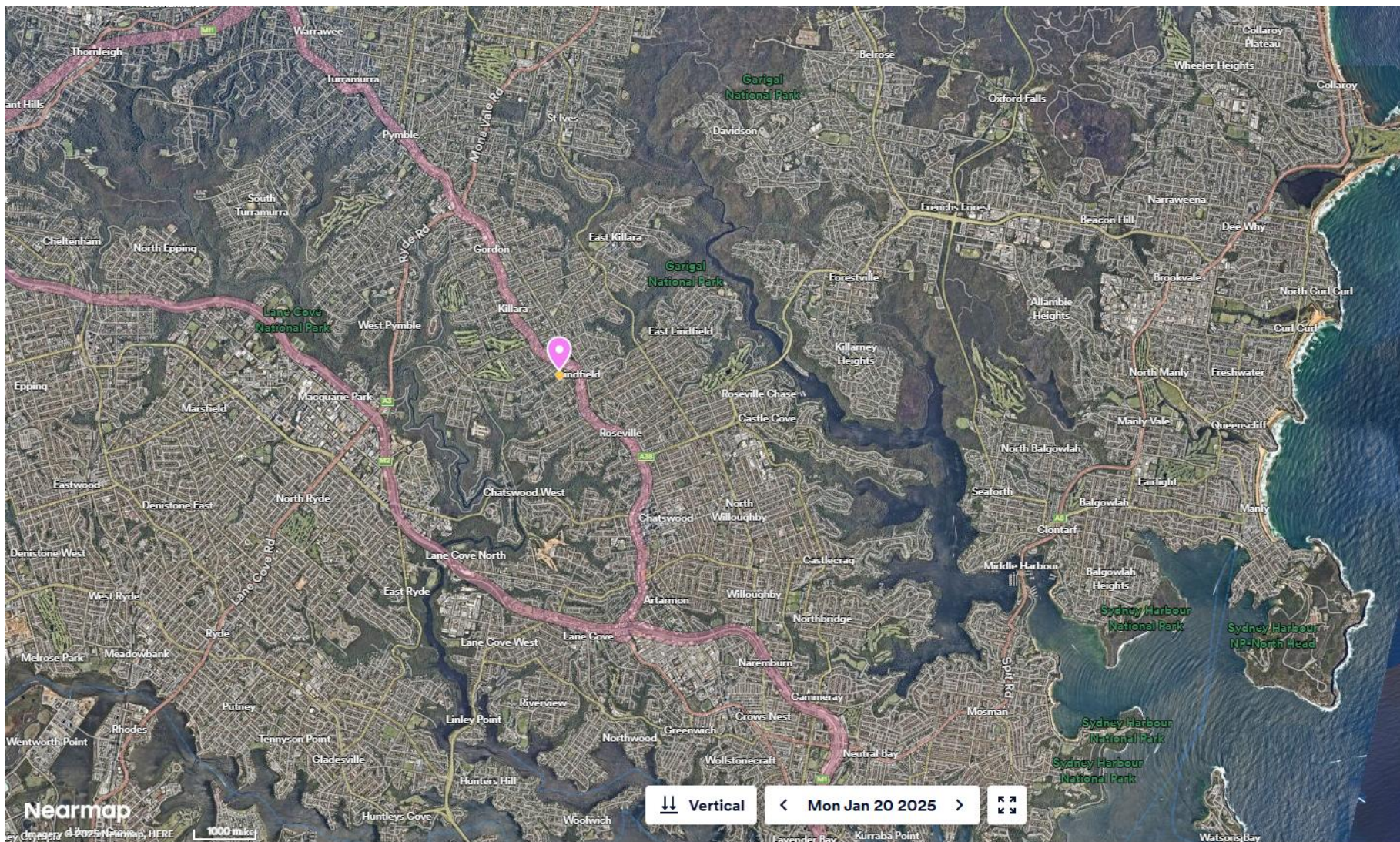


Figure 1 – Aerial view of subject land at 19-25 Balfour St, Lindfield (pink marker), in relation to the surrounding landscape and urbanisation (Nearmap 2025)



Figure 3 - Aerial image of the subject properties at 19 - 25 Balfour Street, Lindfield (blue marker) (Nearmap 2025) indicating residential buildings, Swimming pools and maintained established gardens.



SCHEDULE OF EXTERNAL FINISHES AND MATERIALS

BAL1		WC1		PF1		PF4		BT1	
BAL2		WC2		PF2		BT1		SC1	
BAL3		WC3		PF3		BT2			

DATE	24/06/2025	PROJECT	19-25 BALFOUR STREET
DRAWN BY	DAVID	CHECKED BY	DAVID
DATE	24/06/2025	PROJECT	19-25 BALFOUR STREET
DRAWN BY	DAVID	CHECKED BY	DAVID

GILES TRIBE
ARCHITECTS

SPECIALIST DRAWING
LINDFIELD
SOUTH ELEVATION

FOR APPROVAL
24062 DA300 B

Figure 5 – Image of South Elevation of proposed apartment building at 19 – 25 Balfour Street, Lindfield (for detail see Giles Tribe Architects 2025)

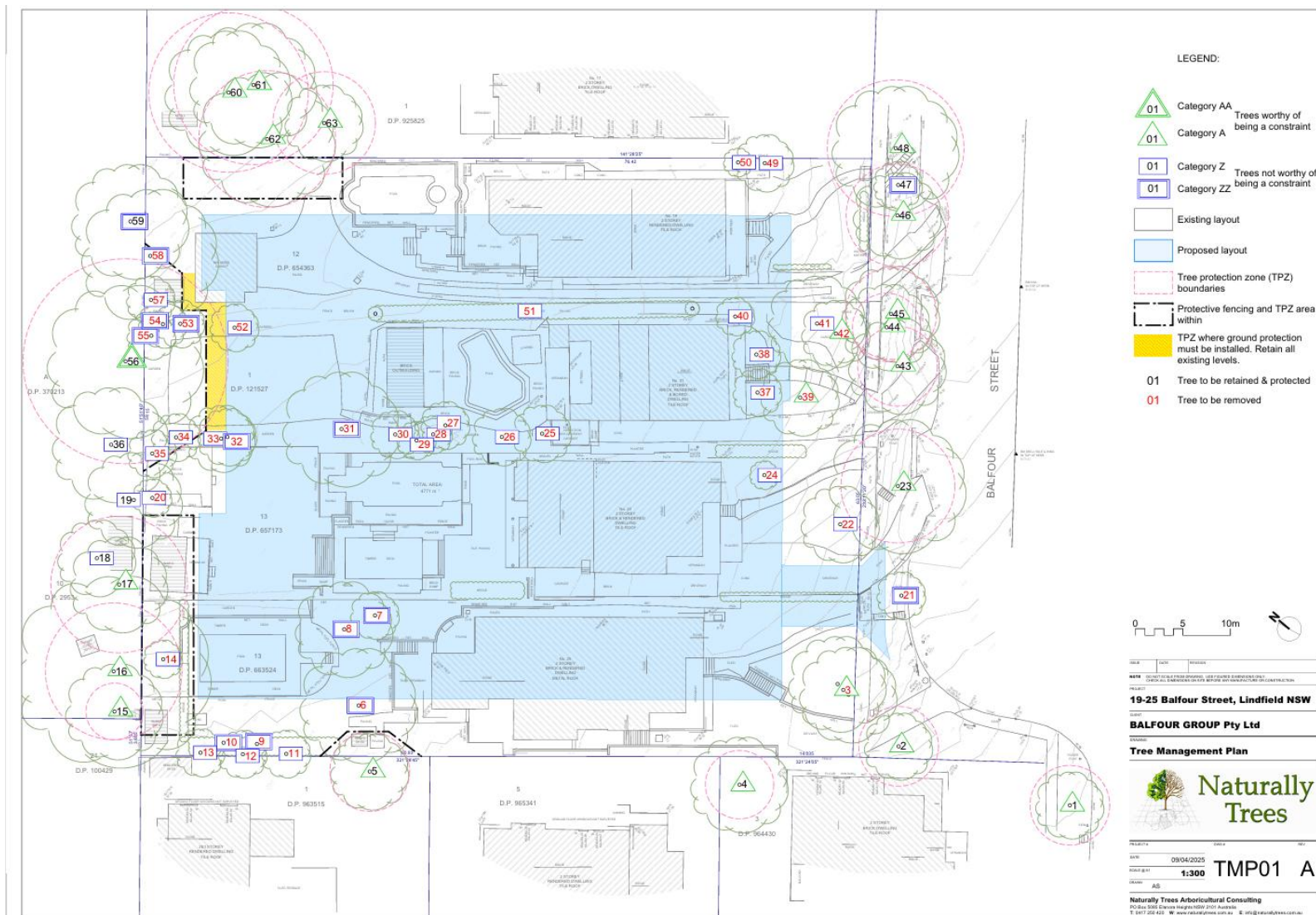


Figure 6 – Schematic image taken from the arboricultural impact assessment (AIA) report showing the proposed development footprint (blue shading) overlain by trees to be removed (mostly exotic species - red numbers) and those to be retained (mostly occurring outside the property boundaries - green numbers) (Naturally Trees 2025).



Figure 7 - Front yard of No. 19 Balfour Street indicating partially managed lawn comprising Common Couch and Kikuyu with ornamental hedges of Camellia and Murraya, with no native species occurring at this site



Figure 8 - Side yard of No. 21 Balfour Street indicating ornamental hedges of Camellia, Raphis Palm and Wild Banana, with Agapanthus and no native species occurring at this site, except for a dead individual of non-locally occurring Broad-leaved Paperbark in the background



Figure 9 – Image of rear yard of No. 23 Balfour Street, Lindfield, indicating unmanaged exotic grassland comprised of Kikuyu and Buffalo Grass with Pumpkin Vine, and with Cypress Pine hedges, Tibouchina, Japanese Maple, Agapanthus, Northern Bangalow Palm etc occurring in the garden

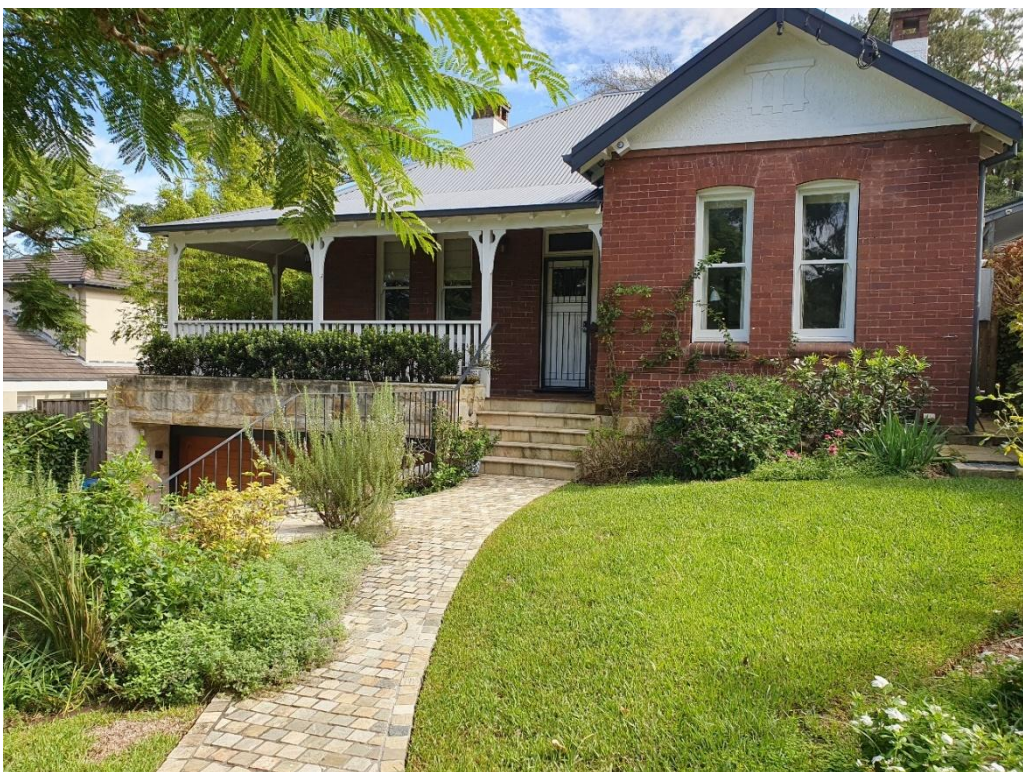


Figure 10 – Front yard of No. 25 Balfour St Lindfield showing managed lawns of Buffalo Grass and garden beds of exotic ornamental species such as Jacaranda, Gardenia, Agapanthus, Murraya, Montbretia, Dietes and Rosemary etc

1.2 Sampling vegetation attributes

An area of managed, urbanised (degraded) vegetation within in the footprint of the apartment footprint was sampled for vegetation composition attributes in a quadrat of size 10 x 40m to derive a Vegetation Integrity Score (VIS). This area and an additional area comprising 600m² within the subject area was sampled for functional attributes.

BAM attributes for floristic composition, structural variation and functional attributes were sampled on the 2nd of April 2025.

Figure 11 indicates the location of the sampling area at the subject property, as well as occurrences of native species elsewhere at the subject areas.

These plots provided the attributes that were used to derive potential offsets. The plots were orientated from the north-east to the south-west (Figure 11)

Table 1 summarises environmental and biotic attributes recorded in the floristic plot (PLOT 1) (Figure 9).

DESCRIPTION	MEDIUM TALL FOREST
PLOT COORDINATES (NE Corner of quadrat)	- 33.775225 151. 165286
BEARING	240 ⁰ SW
APPROX TREE CANOPY COVER (%)	~28%
TOTAL NUMBER LOCALLY- OCCURRING NATIVE SPP	3
LOCALLY- OCCURRING NATIVE CANOPY SPP OCCURRING AT >5% COVER IN 400m PLOT	<i>Eucalyptus sp (appears as sp of red gum),</i>
LOCALLY-OCCURRING NATIVE SPP OCCURRING AT <5% COVER IN 400m PLOT	<i>Oplismenus aemulus, Viola hederacea</i>

Table 1 - Summarises abiotic environmental and biotic attributes recorded at the sampled plot at the subject land.

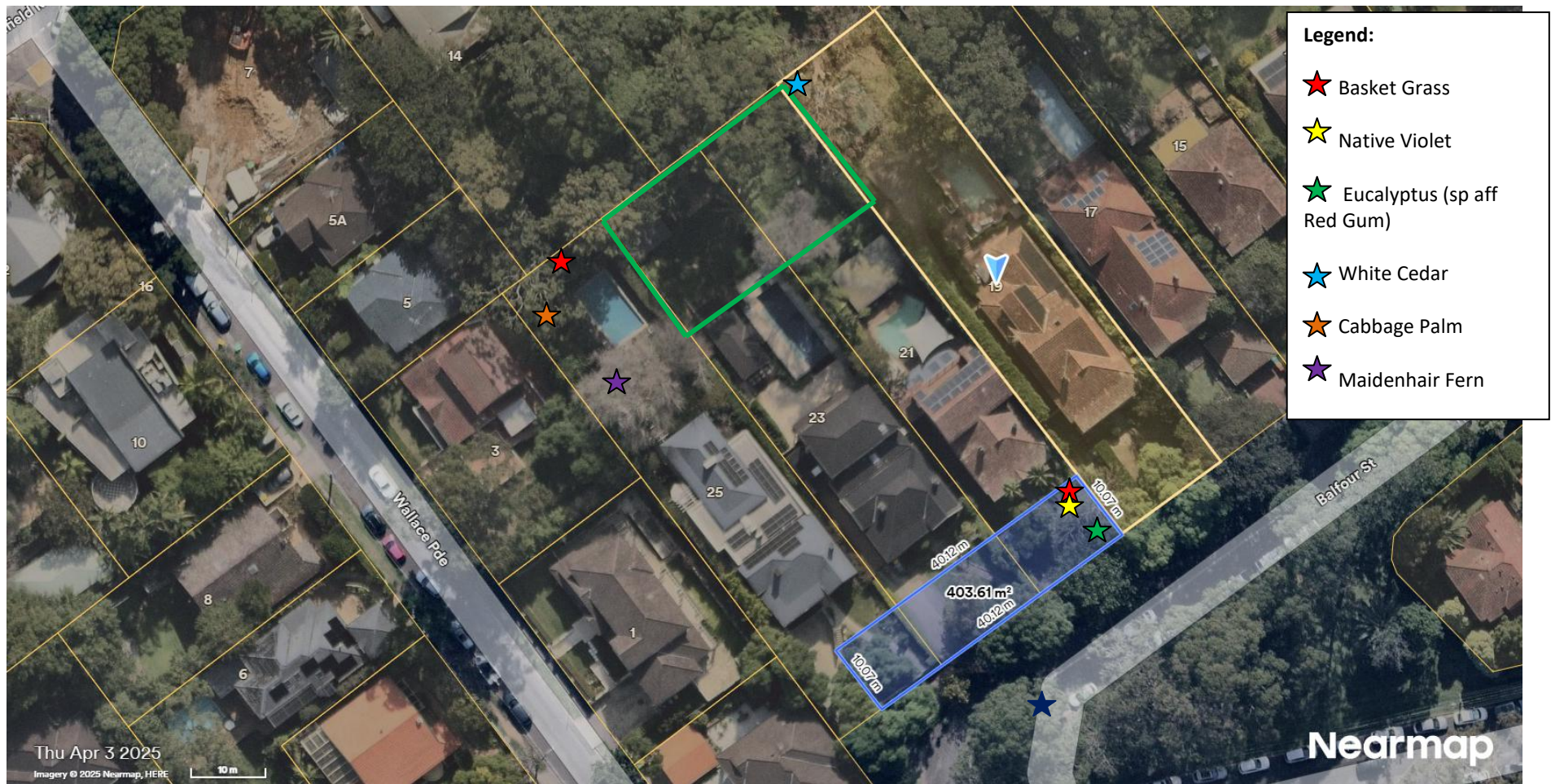


Figure 11 - Sampled quadrats at the subject land, the 400m² quadrat shaded in blue, the larger quadrat for additional functional attributes shaded in green (Nearmap 2025). The various star icons indicate the location of some native species that occur throughout the subject site

1.3 Extent of land to be affected by proposed development

The mapping of Biodiversity Value indicates that there is Biodiversity Value associated with the subject property (Figure 12), and biodiversity offsets would be required for the proposal (BAM 2020).

However, the Biodiversity Values Mapping is based on vegetation mapping of PCT3262 (Sydney Turpentine Ironbark Forest) of individuals of tall mature tree species that previously occurred in parts of the subject site, including a dead individual of Blue Gum that occurs at the rear of No. 19, a dead individual of Turpentine that occurs within the central section of No. 25 (Figure 13) and an individual of Sydney Red Gum that occurred at the rear of No. 23 Balfour Street, Lindfield (Ku-ring-gai Council *pers comm*).

Figure 11 indicates the extent of potential habitat (combined cover values of individual species that may be elements of PCT 3262) that would be impacted by the proposed development. As such, the potential area of impact footprint of the new proposed apartment towers on elements of PCT 3262 within the subject land is estimated at 121m² (or 0.0121ha)

As such, a total extent of 0.0121ha is used for land that is impacted and included in offset evaluation by the BAM Calculator.

The plant community has been mapped by DCCEEW (2025) on the basis of mature trees occurring in neighbouring rear yards, the trees that were present within the subject land that have (Figure 13), the geology of the local substrate, as well as the position on slope, as Sydney Turpentine Ironbark Forest (PCT 3262) (DCCEEW 2025).

This report will determine the number of Biodiversity Credits that may be required to offset the loss of 0.0121ha of former 'Sydney Turpentine Ironbark Forest' (PCT 3262), the offset to be paid under the NSW Biodiversity Offsets Agreement Management Scheme (BOAMS).

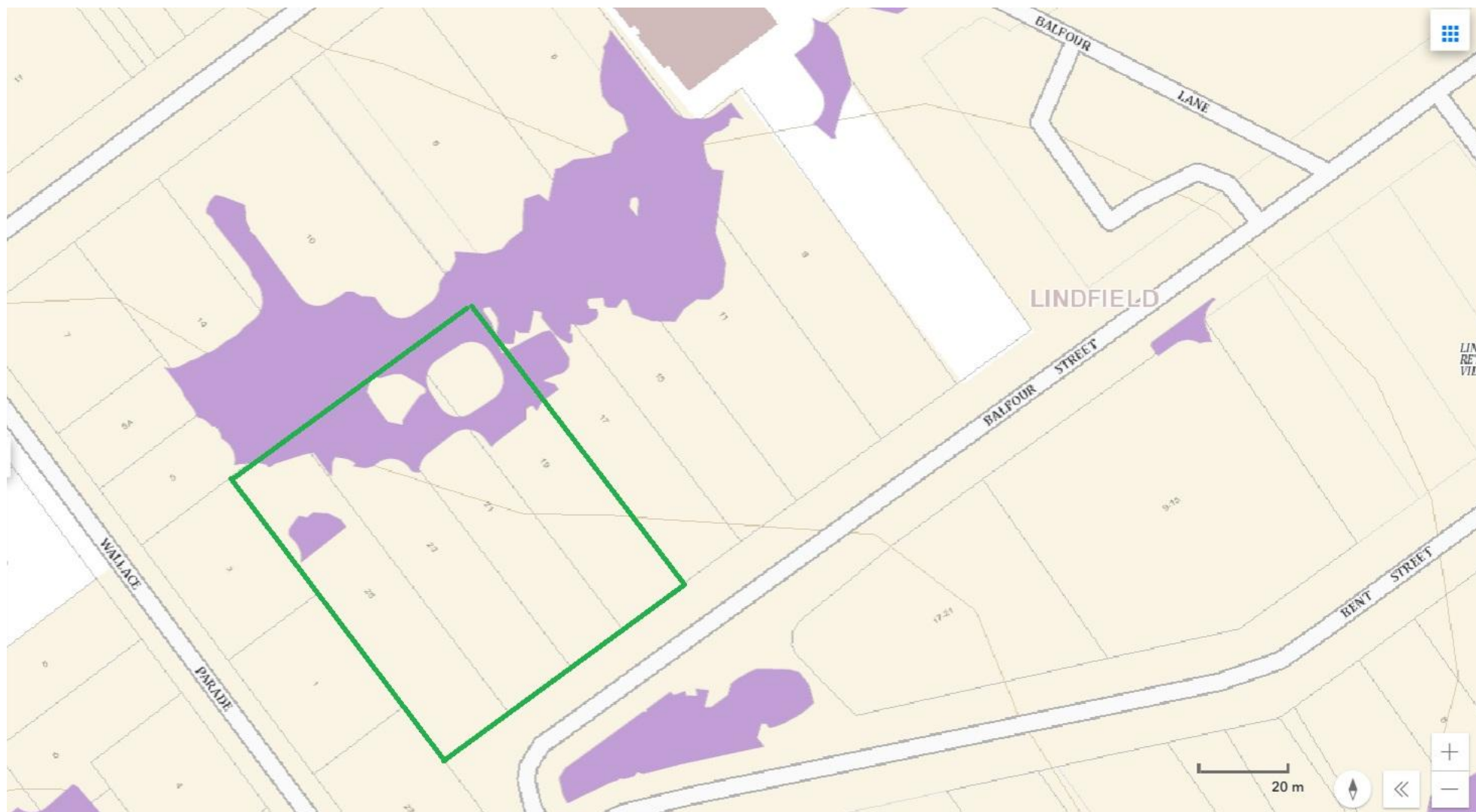


Figure 12 - Biodiversity Values (BV) map indicating that the subject land (green outlined border) at its northern sections have been mapped as having biodiversity value (purple shading) (DCCEEW 2025) due to former occurrences of component trees of PCT 3262 and TPZ's of component trees occurring in neighbouring allotments



*Figure 13 - Stag of dead individual of Turpentine occurring in central section of No. 25 Balfour Street, Lindfield
(Naturally Trees 2025)*

1.4 Topography, geology and soils

The local substrate geology of the subject area occurs on the Triassic Ashfield Shale of the Wianamatta Shale group of sediments, consisting of black to dark-grey shale and laminite (Herbert 1983).

The soil landscape of the site is classified as the erosional 'Glenorie' Soil Landscape Series (DCCEEW 2025).

The 'Glenorie' soil landscape series is characterised by undulating to rolling low hills, narrow ridges, hillcrests and valleys on Wianamatta Group shales. Gradients are at 5-20%, relief 50-80m. The vegetation is typically extensively cleared tall, open, wet sclerophyll forests.

Soils are shallow to moderately deep (<100cm) red podzolics on crests, moderately deep (70-150cm) red and brown podzolics on upper slopes, deep (> 200cm) yellow and gleyed podzolics along drainage lines (DCCEEW 2025).

1.5 Current database and mapping searches

Existing information on 'Threatened Flora of the Locality', defined as an area of 5km radius around the site, was accessed from the DCCEEW Bionet Atlas of NSW Wildlife (online BioNet 2025), Review of Commonwealth DCCEEW Environmental Protected Matters Search Tool for MNES records within an area of 5km radius around the site (May 2025) and RoTAP (Briggs and Leigh 1996) databases.

Other literature detailing regionally and locally threatened and significant flora and fauna, as well as plant communities of the study area, included NSW Scientific Committee Final Determinations (1996-2025), Benson and Howell (1994) and 'The Native Vegetation of the Sydney Metropolitan Catchment Management Authority Area' (OEH 2016).

1.6 Literature review

Information sources reviewed included the following:

Aerial Photograph Interpretation (API)

Relevant guidelines, including:

- Biodiversity Assessment Method (BAM) (2020);
- NSW Guide to Surveying Threatened Plants (OEH 2016);
- 'Species credit' threatened bats and their habitats: NSW survey guide for the Biodiversity Assessment Method (OEH 2018);
- Threatened Biodiversity Survey and Assessment: Guidelines for Developments and Activities (Department of Environment and Conservation 2004);

- DPE Threatened Species, Populations and Ecological Communities website (2024);
- Commonwealth DCCEEW Species, Profile and Threats Database (2024);
- Threatened species survey and assessment guidelines: field survey methods for fauna: Amphibians (DEC 2009);
- NSW Guideline to Surveying Threatened Plants (OEH 2016b);
- Survey guidelines for Australia's threatened birds. Guidelines for detecting birds listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth of Australia 2010a);
- Survey guidelines for Australia's threatened frogs. Guidelines for detecting frogs listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth of Australia 2010c);
- Survey guidelines for Australia's threatened mammals. Guidelines for detecting mammals listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth of Australia 2011);
- Survey guidelines for Australia's threatened orchids (2017);
- Guidelines for detecting bats listed as 'threatened' under the Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth of Australia 2013).

2 LANDSCAPE FEATURES

2.1 IBRA Regions and Subregions

The subject site occurs within the Sydney Basin IBRA region and the Cumberland IBRA Subregion.

2.2 Mitchell Landscapes (NSW Landscape regions)

The landscape features of the subject site included in a 1500m buffer zone centred around the subject site occurs within the Pennant Hills Ridges landscape in the Pittwater IBRA Subregion within the Sydney Basin IBRA region.

The Mitchell Landscape is described as follows:

Rolling to moderately steep hills on horizontal Triassic shales and siltstones. General elevation 10 to 90m, local relief 60m. Deep red texture-contrast soils on narrow hillcrests, red and brown to yellow texture-contrast soils on slopes becoming slightly harsher in drainage lines.

Tall open forest of Sydney blue gum (*Eucalyptus saligna*), turpentine (*Syncarpia glomulifera*), blackbutt (*Eucalyptus pilularis*), white stringybark (*Eucalyptus globoidea*), grey ironbark (*Eucalyptus paniculata*), forest oak (*Allocasuarina torulosa*) and rough-barked apple (*Angophora floribunda*).

Rainforest elements in protected moist gully heads with sweet pittosporum (*Pittosporum undulatum*), cheese tree (*Glochidion ferdinandi*), sandpaper fig (*Ficus coronata*) and black wattle (*Callicoma serratifolia*).

2.3 Extent of native vegetation in 1500m buffer

The area of native vegetation cover within a 1,500 m buffer area surrounding the site is shown in Figure 14. It is estimated that the native vegetation cover within the 1500m buffer area (Figure 14) to the subject site is 19.2% and this was used in the BAM Offsets calculations.

2.4 Wetlands, Rivers, Streams and Estuaries

No significant wetlands, rivers, streams and estuaries are present within the developmental section of the subject land or that would affect the assessment.

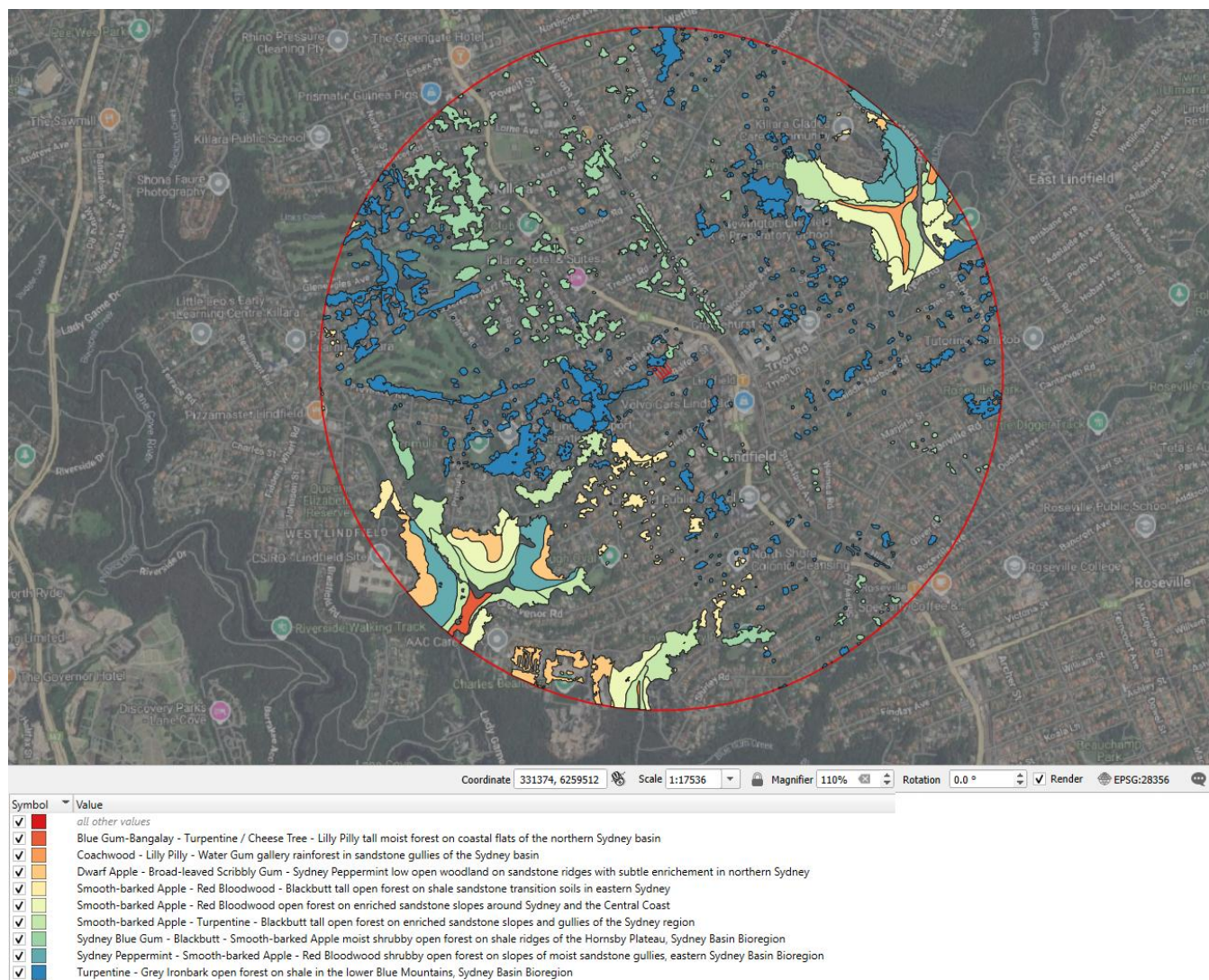


Figure 14 - Indicates the 1500m buffer zone surrounding the subject site at Lindfield where % vegetation within the buffer zone is 19% and patch size estimated at 141.5ha (Drevon GIS 2025)

2.5 Connectivity

Landscapes that retain connections between patches of otherwise isolated areas of vegetation are more likely to maintain more numerous and more diverse populations of plant and animal species (Lindenmayer and Fischer 2006).

In the subject locality the canopy cover is highly fragmented with little connectivity among adjacent properties and surrounding canopies. It is considered that any potential connectivity to the biodiversity corridor that currently exists in the area would not be significantly impacted.

2.6 Areas of geological significance and soil hazard features

These features are not present on the subject land. The landscape is stabilised by vegetative cover, dead foliage and building rubble and no evident soil creep or landslip features are apparent.

2.7 Areas of Outstanding Biodiversity Value (AOBV)

AOBV are special areas that contain irreplaceable biodiversity values that are considered important to NSW, Australia or globally. No listed AOBV occur within the site or within a 1,500m area buffer around the subject site.

2.8 Site context

2.8.1 Native vegetation cover

Native vegetation cover is calculated as a percentage cover occurring on the subject land and within the surrounding 1,500m buffer area (Figures 11 & 14) (Drevon GIS 2025).

Cover estimates are based on the cover of native woody and non-woody vegetation relative to the approximate benchmarks for the PCT considering the extent and condition of the vegetation. The native vegetation cover within the 1500m buffer area is estimated at 19.2% (Figure 14).

2.8.2 Patch size

Patch size is used to describe areas that include native vegetation with a gap of less than 100m from adjacent or surrounding areas of native vegetation that occur in moderate to good condition.

The patch size for the vegetation onsite is assessed as 141.5ha (Drevon GIS 2025) (Figure 14).

3 NATIVE VEGETATION

3.1 Native vegetation extent within subject site

The majority of the vegetation in the front and rear of the properties consist of landscaped yards and lawns with planted exotic ornamentals, including species such as *Clivia miniata* (Clivia), *Cupressus sp.* (Cypress Pine), *Buxus microphylla* (Buxus hedge), *Hydrangea macrophylla* (Garden Hydrangea), *Nephrolepis cordifolia* (Fishbone fern) and *Murraya paniculata* (Orange Jessamine).

A small number of non-native canopy species exist at the site, such as *Jacaranda mimosifolia* (Jacaranda), *Magnolia grandiflora* (Southern Magnolia), *Acer palmatum* (Japanese Maple) and *Archontophoenix alexandrae* (Northern Bangalow Palm).

A few native ground and shrub species were also noted with very low cover, such as *Adiantum aethiopicum* (Common Maidenhair), *Oplismenus aemulus* (Basket Grass) and *Viola hederacea* (Native Violet) (Figure 11).

Few live native canopy trees exist at the subject site. The three native trees within the lot boundaries are dead or dying, lack hollows and are marked for removal as part of the development (Trees 6, 31 and 58, Naturally Trees 2025; Figure 13).

An individual of eucalypt (likely a species of Red Gum) occurs within the front yard of No. 21 Balfour Street, and will be impacted by the development and its canopy spread is included in the area impacted by the proposed development (Naturally Trees 2025).

The remaining native trees occur outside the lot boundaries, and their Tree Protection Zones (TPZs) do not encroach within the development's impact zone (Figures 3 & 5; Naturally Trees 2025).

Appendix 1 contains a full list of flora species found at the subject site, and Figures 7, 8, 9 & 10 indicate typical vegetation occurring within the front and rear yards of the residential properties.

The total area of isolated patches of native vegetation cover, including trees, shrubs, grasses, forbs and ferns, within the site was estimated at about 2.5% of the total area of the subject property (Figure 11) and equates to about 121m² (mostly afforded by an individual of eucalypt with a canopy spread of 12m (Naturally Trees 2025).

The extent of isolated patches native vegetation intended for removal is estimated to be about 0.0121ha or 121m², and includes a patch of Basket Grass, an individual of Maidenhair

Fern, an individual of eucalypt (*aff.* Red Gum) a patch of Native Violet, a sapling of the opportunistic species White Cedar, and a sapling of Cabbage Palm (Figure 11).

This extent equates to about 2.5% of the total area of the development site, the large proportion consisting of managed gardens and lawns of ornamental and exotic plant species (Figures 7, 8, 9 & 10).

As such, a total of 0.0121ha was included in the BAM calculator for the potential impacted area of native vegetation which would be cleared to construct a new apartment block for ToD development (Figures 4, 5 & 6)

3.2 Plant Community Types (PCTs)

3.2.1 Plant Community Type mapped and PCT assessed as occurring at the site

Mapping by DCCEEW (2025) and ground-truthing the vegetation has confirmed the vegetation across the subject site includes current fragmented elements and former elements of PCT 3262 - Sydney Turpentine Ironbark Forest (Figure 15).

The description of PCT 3262 refers to a tree canopy that commonly includes a high cover of *Syncarpia glomulifera*, *Eucalyptus saligna*, *Eucalyptus paniculata* and *Angophora costata* (DCCEEW 2025).

As such, PCT 3262 was entered into the BAM calculator as the relevant PCT for this assessment.

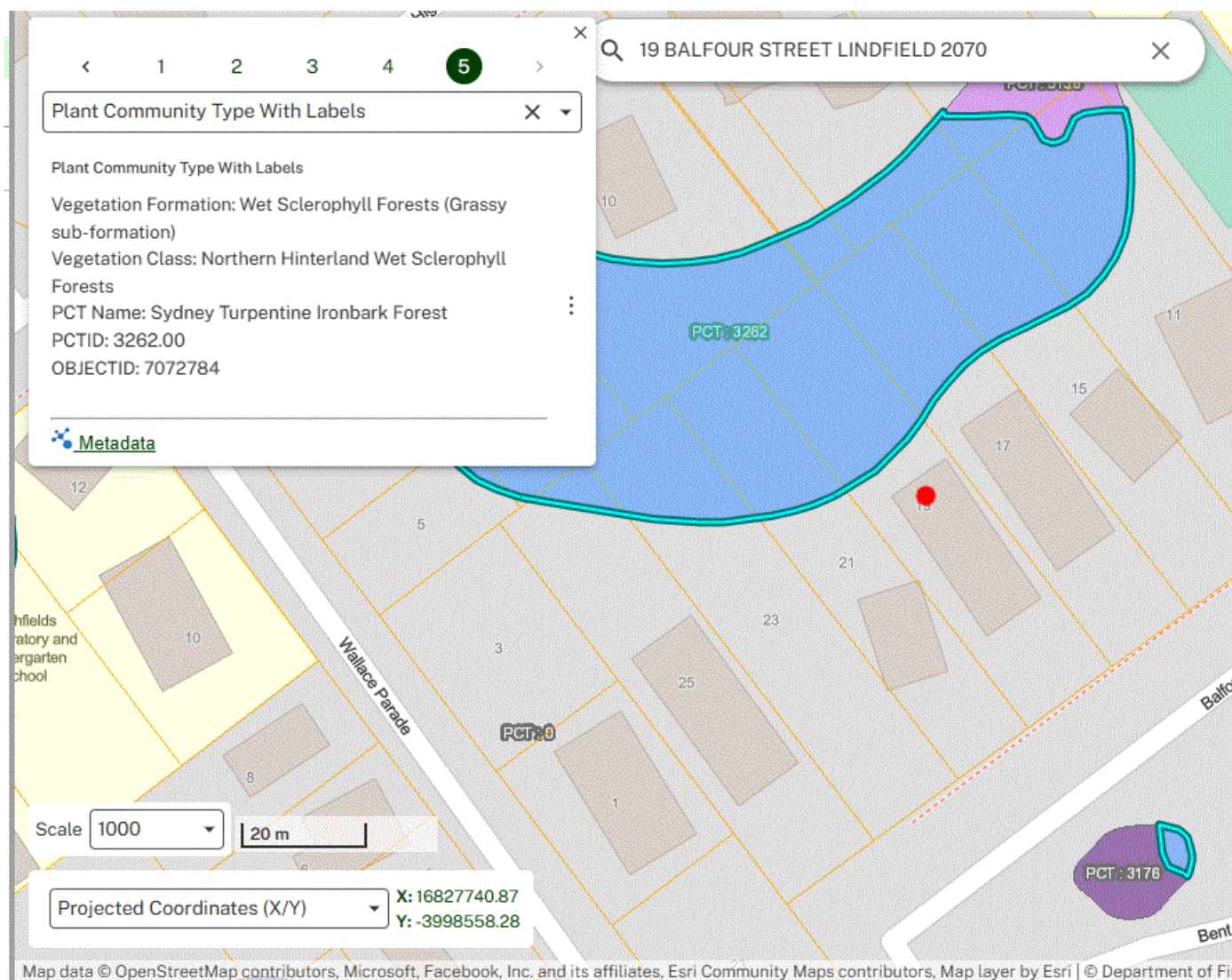


Figure 15 - Mapping of ecological communities in the locality including the Study Area indicating a distribution of Sydney Turpentine Ironbark Forest (PCT 3262) occurring in a wide band (blue shading with aqua border) through the northern sections of the subject properties (red dot) (DCCEEW mapping 2025).

Description of Sydney Turpentine Ironbark Forest (STIF) (from DCCEEW 2025)

BioNet Vegetation Classification - Community Profile Report

Plant Community Type ID (PCT ID): 3262

PCT Name: Sydney Turpentine Ironbark Forest

Classification Confidence Level: 1-Very High

Total Number of Replicates: 132

Number of Primary Replicates: 120

Number of Secondary Replicates: 12

Vegetation Description: A tall to very tall sclerophyll open forest with mid-stratum of mixed sclerophyll and mesophyll shrubs and a ground layer of grasses and forbs, found on shale or sheltered shale-sandstone soils mainly in the northern suburbs of Sydney and lower Blue Mountains. The tree canopy very frequently includes *Syncarpia glomulifera* either as a canopy dominant or as a smaller tree or both. Other species which are localised and occasionally dominant or co-dominant occasionally include *Eucalyptus pilularis*, *Angophora costata* and *Eucalyptus punctata*, rarely with one of several species from the ironbark, stringybark or mahogany eucalypt groups of which *Eucalyptus paniculata*, *Eucalyptus globoidea* and *Eucalyptus resinifera* are the most frequent of each group. The mid-stratum is layered, with a sparse cover of small trees that includes eucalypts, occasionally *Acacia parramattensis* and *Allocasuarina torulosa*, rarely with *Allocasuarina littoralis*. The lower shrub layer very frequently includes *Pittosporum undulatum* and *Leucopogon juniperinus*, commonly with *Breynia oblongifolia*, *Polyscias sambucifolia*, *Ozothamnus diosmifolius* and *Notelaea longifolia*. The ground layer includes a diverse cover of grasses that very frequently includes *Microlaena stipoides* and *Entolasia stricta*, commonly with *Imperata cylindrica*, *Entolasia marginata* and *Themeda triandra*. Small forbs including *Lobelia purpurascens* are also very frequent, together with *Lomandra longifolia*. This PCT occurs as small remnants in mosaics of urban land use in the shale-dominated landscapes in higher rainfall zones of the Sydney Metropolitan area. The northern suburbs between Baulkham Hills and Ku-ring-gai include the highest number of remnants, however small areas remain in Sutherland, Heathcote, Menai, lower Blue Mountains and Oakdale plateau west of Picton. Only a small number of remnants remain on the Wianamatta Group shales of the eastern Cumberland Plain between Villawood and Bankstown. This community grades into tall moist shrub forests PCT 3136 in higher rainfall shale-rich soils on the north shore, or into PCT 3620 in sandstone environments. On the margins of the Cumberland Plain it may grade into dry forests PCTs 3321 or 3616 with increased exposure.

Vegetation Formation: Wet Sclerophyll Forests (Grassy sub-formation);

Vegetation Class: Northern Hinterland Wet Sclerophyll Forests;

IBRA Bioregion(s): Sydney Basin;

IBRA Sub-region(s): Burragorang; Cumberland; Pittwater; Sydney Cataract; Wollemi;

LGA: BLUE MOUNTAINS; CAMPBELLTOWN; CANADA BAY; CANTERBURY-BANKSTOWN; HAWKESBURY; HORNSBY; KU-RING-GAI; CITY OF PARRAMATTA; RYDE; SUTHERLAND SHIRE; THE HILLS SHIRE; WOLLONDILLY;

Elevation (m) (Min, Median, Max): 5.0 96.4 460.6

Annual Rainfall (mm) (Min, Median, Max): 806 1020 1256

Annual Mean Temperature (deg C) (Min, Median, Max): 14.16 16.60 17.09

Median Native Species Richness per plot: 44

TEC Assessed: Has associated TEC

TEC List: Listed BC Act, CE: Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion (Equivalent); Listed EPBC Act, CE: Turpentine-Ironbark Forest of the Sydney Basin Bioregion (Part);

TEC Comments: (Comment TEC1) Relates to the NSW Sydney Turpentine-Ironbark Forest TEC. (Comment TEC2) Relates to the Commonwealth Turpentine-Ironbark Forest TEC where it occurs within the stated LGAs as per Section 4 of the Listing Advice (LGA boundaries as at 26 August 2005) and fits the condition classes as per Section 3 of the Listing Advice.

PCT Percent Cleared: 95.91

PCT Definition Status: Approved

3.2.1 Plot data used in BAM Calculator

The area containing Plot 1 (Figure 11) was subject to BAM analysis for a Vegetation Integrity Score that may require biodiversity offsets.

The data for Plot 1 is presented in Appendix 1.

3.2.2 Flora species occurring in plot

The complement of flora species and respective cover values are listed in Appendix 1.

3.2.3 Fauna species and potential fauna habitat

The area subject to offsets (Figure 11) mostly comprises established ornamental gardens and lawns (Figures 7, 8, 9 & 10) with very few locally-occurring native species representative of PCT 3262 occurring in the assemblage (Table 1; Appendix 1).

During the site survey no tree hollows were sighted in any mature trees or stags occurring within the development footprint (Figures 7, 8, 9 & 10 & 13).

A range of common native bird species may forage and overfly the mostly exotic canopy and shrub species present at the subject site, including Noisy Minor, Rainbow Lorikeet, Laughing Kookaburra, Little Wattle Bird, Red Wattle Bird and the Sulphur Crested Cockatoo. Natural tree cover is relatively sparse across the immediate locality, habitat not very suitable for arboreal species and species of avifauna.

The ground stratum has a high cover of ornamental plants (Figures 7, 8, 9 & 10) though with low weed cover and a very low native species diversity. This stratum contains a relatively poor structural habitat for sheltering and foraging.

Reptiles observed include the Dark-flecked Skink, though the Eastern Water Skink is also expected to occur.

Birds

A Titley Chorus Bat Detector was placed over a period of 7 days to record acoustic bird activity for a period of 2 hours each day (an hour either side of sunrise), totalling 14 hours of recordings.

These were analysed for bird activity in this area. In addition to the above, the most frequently recorded birds included the Rainbow Lorikeet (*Trichoglossus moluccanus*), the Australian Raven (*Corvus coronoides*), the Australian Magpie (*Gymnorhina tibicen*), and Grey Butcherbird (*Cracticus torquatus*).

Mammals

Bandicoot diggings were not found within the boundaries of the subject site but were noted in the rear garden of an adjoining property (14 Highfield Rd), likely belonging to the common Long-nosed Bandicoot, however no individuals were sighted or recorded.

Tree trunks did not show any activity of arboreal fauna markings, however some trees on the council verges and in adjoining properties contained bark fissures large enough to accommodate hollow-dwelling microchiropteran bats.

A Titley Chorus Bat Detector was configured to record ultrasonically for 2 hours each day (an hour either side of sunset) over 7 nights in an attempt to record any bat activity, and was placed in a corridor in the front garden of 19 Balfour Street.

A total of 216 sequences were recorded. Of these, 69 (32%) were of sufficient quality to enable a positive, or near positive identification.

Two categories of confidence are used for the identification of these species:

Definitely recorded (D), where the quality and structure of the call sequence is such that the identity of the bat can be made with a strong possibility of accuracy, and

Potentially recorded (P), where the quality and structure of the call sequence is such that there is some possibility of overlap between two or more species.

After analysis of the recorded sequences, there was found to be at least 5, possibly 7, species of microchiropterans recorded during the survey (Table 2).

The following table lists the results and indicates the status of the Bat under the Biodiversity Conservation Act (2016).

Scientific Name	Common Name	Presence	BC Act Status
<i>Chalinolobus gouldii</i>	Gould's Wattled Bat	D	
<i>Miniopterus australis</i>	Little Bent-wing Bat	P	Vulnerable
<i>Ozimops planiceps</i>	Southern free-tailed bat	P	
<i>Ozimops ridei</i>	Eastern Free-tail bat	D	
<i>Saccolaimus flaviventris</i>	Yellow-bellied sheath-tail bat	P	Vulnerable
<i>Vespadelus pumilus</i>	Eastern forest bat	P	
<i>Vespadelus regulus</i>	Southern forest bat	D	

Table 2 - Microbat species recorded at the subject site and Status under the NSW Biodiversity Conservation Act (2016)

It is not expected that any individuals of microbats will be impacted by the proposed development though it is expected that a targeted microbat survey is undertaken of any apparent roof cavities or under eaves where microbats may be roosting, at a time after the properties have been vacated but before demolition.

Demolition would involve removing sections of the roof sequentially during the evening when any potential roosting microbats will likely be foraging and not occupying any spaces in the buildings.

3.3 Vegetation Integrity Assessment

3.3.1 Vegetation Zone

The vegetation zone comprises an established urbanised managed landscape with maintained lawns, gardens, hedges and rows or patches of mostly exotic trees.

Plot 1 was dominated by 1 tree species - an individual of eucalypt, most likely a species of red gum, likely not locally-occurring in the locality (Appendix 1).

There was one forb species Native Violet (*Viola hederacea*) that occurred sparsely in the ground layer of No. 21 Balfour Street and one native grass species, Basket Grass (*Oplismenus aemulus*) that also occurred sparsely in the ground layer of No. 21 Balfour Street (Figure 11).

The plot was located as shown in Figure 11.

Quantitative measures for species composition, structure and function attributes (Table 3) were derived from the intact vegetation within the plot as listed in Table 2 of BAM (2020).

The 10m x 40m plot was located within mostly intact vegetation, including lawns, hedges and small clumps of mostly exotic tree species (Figure 11) and scores derived for functional attributes included the larger plot (Figure 11).

Condition attributes use to assess composition of vegetation	Condition attributes use to assess structure within vegetation	Condition attributes use to assess functionality within vegetation
Tree richness	Tree cover	Number large trees
Shrub richness	Shrub cover	Tree regeneration potential
Grass and grass-like richness	Grass and grass-like cover	Tree stem size classes Tree hollows
Forb richness	Forb cover	Total length of fallen logs
Fern richness	Fern cover	Litter cover
Other richness (Twining, Palms etc)	Other cover (Twining etc)	High Threat Weed cover

Table 3 - Condition attributes for composition, structure and function at plots (Table 1; Figure 8) which were sampled for BAM analysis (from Table 2 in BAM 2020).

Table 4 tabulates the plot scores for the attributes listed in Table 3 for the plot.

PLOT 1 (Figure 9)

Life-form	Tree	Shrub	Grass & Grass-like	Forb	Fern	Other
Counts for composition	1	0	1	1	0	0
Counts for cover (%)	28	0	0.01	0.01	0	0

Number large trees (>80cm DBH)	Tree regeneration	Tree stem size classes (cm)					Length fallen logs	Litter cover (%)	Tree Hollows	HTW (%)
		5-9	10-19	20-29	30-49	50-79				
0	absent	no	no	no	no	yes	0	0	0	0

Table 4 - Condition attributes for composition, structure and function in Plot 1 (Figure 9)

Table 5 summarises the condition attributes for composition, structure and functionality of the biota in the plot which were sampled for BAM analysis, with the resultant Vegetation Integrity Score (VIS) based on the area of 0.0121ha impacted (from Table 2 in BAM 2020). The VIS is used to calculate the offset credits required and the costs incurred for clearing elements of native vegetation representative of PCT 3262 on the subject land.

PLOT 1 (Figure 11)

ATTRIBUTE	COMPOSITION SCORE	STRUCTURE SCORE	FUNCTION SCORE	VEGETATION INTEGRITY SCORE (VIS)
PCT 3262	1	20.8	1.3	3

Table 5 - Condition attribute scores for composition, structure, function and VIS at Plot 1 for PCT 3234.

4 THREATENED SPECIES

4.1 Ecosystem Credit Species

These species are those where the likelihood of occurrence of the species potential elements of the species habitat can reasonably be predicted by vegetation surrogates and features of the landscape, or for which targeted species surveys have a low probability of detection.

The Threatened Biodiversity Data Collection (TBDC) has identified 23 potential ecosystem credit species as predicted by vegetation surrogates and landscape features. These are listed and addressed in Appendix 2.

4.2 Species Credit Species (Candidate Species)

These species are those where the likelihood of occurrence of the species, or potential suitable elements of the species habitat, cannot be reliably predicted by vegetation surrogates and landscape features and can more reliably be detected by species surveys.

The TBDC has identified 39 potential candidate species and these are listed and addressed in the following Table 5.

In accordance with Section 5.3 of BAM (2020) a targeted species survey must be undertaken for a threatened candidate species that is likely to occur at the site based on the application of Steps 1 - 3 in Sub-sections 5.2.1 - 5.2.3 (BAM 2020).

The habitat features for breeding for threatened microchiropterans (such as caves, rocky overhangs and escarpments) are not present on the subject land that is proposed to be impacted. No other cliffs or caves occur within the area proposed for development.

Targeted surveys for Scrub Turpentine (*Rhodamnia rubescens*) and Eastern Australian Underground Orchid (*Rhizanthella slateri*) were undertaken throughout the proposed development site but none were located.

Even though it is totally incongruous that the TBDC has identified 39 species of threatened taxa that could potentially occur in an urbanised, managed landscape with mostly exotic plants, the BAM dictates that all these Species Credit Species (Candidate Species) listed in the TBDC be addressed as to their suitability to the habitat and likelihood of occurrence. This list is presented in Table 6.

Table 6 - Candidate species assessment table for highly degraded PCT 3262 occurring at 19 - 25 Balfour Street, Lindfield (Duchatel 2023, DCCEEW 2025)

Species name	Common name	Credit type	Retained	Justification in BAM C if not retained (habitat characteristics - constraints)
Amphibians				
<i>Litoria aurea</i>	Green and golden bell frog	Species	No	Habitat absent: i.e., inhabits marshes, dams and stream-sides, particularly those containing bullrush (<i>Typha</i> spp.) or spikerushes (<i>Eleocharis</i> spp.). Optimum habitat includes waterbodies that are unshaded, free of predatory fish such as Plague Minnow (<i>Gambusia holbrooki</i>), have a grassy area nearby and diurnal sheltering sites available.
<i>Pseudophryne australis</i>	Red-crowned toadlet	Species	No	Habitat degraded: i.e., occur in open forests, mostly on Hawkesbury and Narrabeen Sandstones. Inhabits periodically wet drainage lines below sandstone ridges that often have shale lenses or cappings. Shelters under rocks and amongst masses of dense vegetation or thick piles of leaf litter. Breeding congregations occur in dense vegetation and debris beside ephemeral creeks and gutters. Red-crowned Toadlets have not been recorded breeding in waters that are even mildly polluted or with a pH outside the range 5.5 to 6.5. Such habitat is absent from the subject land.
Microchiropterans				
<i>Chalinolobus dwyeri</i>	Large-eared pied bat	Species	No	Habitat constraint: i.e., absence of caves, crevices in cliffs, old mine workings, disused nests of the Fairy Martin (<i>Petrochelidon ariel</i>) which are not available within the subject land.
<i>Miniopterus australis</i>	Little bent-winged bat	Species (breeding)	No	Breeding habitat constraint: i.e., only five nursery sites /maternity colonies are known in Australia Maintained as ecosystem credit species in BAM C. Recorded as foraging in the subject area.
<i>Miniopterus</i>	Large bent-	Species	No	Breeding habitat constraint: i.e., maternity caves with specific temperature and

Species name	Common name	Credit type	Retained	Justification in BAM C if not retained (habitat characteristics - constraints)
<i>orianae oceanensis</i>	winged bat	(breeding)		humidity regimes. Maintained as ecosystem credit species in BAM C.
<i>Myotis macropus</i>	Southern myotis	Species	No	Habitat absent: i.e., generally roost in groups of 10 - 15 close to water in caves, mine shafts, hollow-bearing trees, storm water channels, buildings, under bridges and in dense foliage. Forage over streams and pools catching insects and small fish by raking their feet across the water surface. Such habitat is absent from the subject land.
Megabats				
<i>Pteropus poliocephalus</i>	Grey-headed flying fox	Species (breeding)	No	Breeding habitat constraint: i.e., the prospect of the species forming a maternity colony habitat at the populated area of the subject land is considered highly unlikely. Maintained as ecosystem credit species in BAM C.
Birds				
<i>Anthochaera phrygia</i>	Regent honeyeater	Species (breeding)	No	Breeding habitat constraint: i.e., subject land not within a mapped breeding area for the species (which is only known to breed at three locations). Maintained as ecosystem credit species in BAM C.
<i>Burhinus grallarius</i>	Bush stone curlew	Species	No	Habitat absent: i.e., inhabits open forests and woodlands with a sparse grassy groundlayer and fallen timber and nests on the ground in a scrape or small bare patch. Subject land lacks fallen timber and nesting habitat.
<i>Callocephalon fimbriatum</i>	Gang-gang cockatoo	Species (breeding)	No	Breeding habitat constraint: i.e., hollows that are 10 cm in diameter or larger and at least 9m above the ground in eucalypts. Maintained as ecosystem credit species in BAM C.
<i>Calyptorhynchus lathamii</i>	Glossy black cockatoo	Species (breeding)	No	Breeding habitat constraint: i.e., dependent on large hollow-bearing eucalypts for nest sites Maintained as ecosystem credit species in BAM C.
<i>Haliaeetus leucogaster</i>	White-bellied sea	Species (breeding)	No	Breeding habitat constraint: i.e., nest trees are typically large emergent eucalypts and often have emergent dead branches or large dead trees nearby which are used

Species name	Common name	Credit type	Retained	Justification in BAM C if not retained (habitat characteristics - constraints)
	eagle			as 'guard roosts'. Nests are large structures built from sticks and lined with leaves or grass. Maintained as ecosystem credit species in BAM C.
<i>Hieraaetus morphnoides</i>	Little eagle	Species (breeding)	No	Breeding habitat constraint: i.e., nests in tall living trees within a remnant patch, where pairs build a large stick nest in winter. Maintained as ecosystem credit species in BAM C.
<i>Lathamus discolor</i>	Swift parrot	Species (breeding)	No	Breeding habitat constraint: i.e., subject land is located adjacent BAM important area for the species. Subject land is not located on land mapped in BAM as an important area for the species (though immediately adjacent to mapped important areas, however the proposal will not impact on this area) Maintained as ecosystem credit species in BAM C.
<i>Lophoictinia isura</i>	Square tailed kite	Species (breeding)	No	Breeding habitat constraint: i.e., nest sites generally located along or near watercourses, in a fork or on large horizontal limbs. Maintained as ecosystem credit species in BAM C.
<i>Ninox connivens</i>	Barking owl	Species (breeding)	No	Breeding habitat constraint: i.e., hollows of large, old trees. Living eucalypts are preferred though dead trees are also used. No large hollows in mature dead trees onsite Maintained as ecosystem credit species in BAM C.
<i>Ninox strenua</i>	Powerful owl	Species (breeding)	No	Breeding habitat constraint: i.e., nest in large tree hollows (at least 0.5 m deep), in large eucalypts (diameter at breast height of 80-240 cm) that are at least 150 years old. Maintained as ecosystem credit species in BAM C.
<i>Pandion cristatus</i>	Eastern osprey	Species (breeding)	No	Breeding habitat constraint: i.e., nests are made high up in dead trees or in dead crowns of live trees, usually within one kilometre of the sea. Maintained as ecosystem credit species in BAM C.
<i>Tyto novaehollandiae</i>	Masked owl	Species (breeding)	No	Breeding habitat constraint: i.e., Roosts and breeds in moist eucalypt forested gullies, using large tree hollows or sometimes caves for nesting.

Species name	Common name	Credit type	Retained	Justification in BAM C if not retained (habitat characteristics - constraints)
				Maintained as ecosystem credit species in BAM C.
Invertebrates				
<i>Meridolum corneovirens</i>	Cumberland Plain land snail	Species	No	Habitat absent and degraded: i.e., primarily inhabits Cumberland Plain Woodland living under litter of bark, leaves and logs, or shelters in loose soil around grass clumps. Occasionally shelters under rubbish. Such habitat is absent from subject land.
<i>Pommerhelix duralensis</i>	Dural land snail	Species	No	Habitat absent and degraded: i.e., the species has a strong affinity for communities in the interface region between shale-derived and sandstone-derived soils, with forested habitats that have good native cover and woody debris. The subject land is located within this interface region but has been wholly modified with virtually no native cover and woody debris is absent.
Marsupials				
<i>Cercartetus nanus</i>	Eastern pygmy possum	Species	No	Habitat degraded: i.e., found in a broad range of habitats, but in most areas woodlands and heath appear to be preferred, except in north-eastern NSW where they are most frequently encountered in rainforest. They may occupy small patches of vegetation in fragmented landscapes and although the species prefers habitat with a rich shrub understory, they are known to occur in grassy woodlands and the presence of Eucalypts alone is sufficient to support populations in low densities. Feed largely on nectar and pollen collected from banksias, eucalypts and bottlebrushes; an important pollinator of heathland plants such as banksias; soft fruits are eaten when flowers are unavailable. Also feeds on insects throughout the year; this feed source may be more important in habitats where flowers are less abundant such as wet forests. Shelter in tree hollows, rotten stumps, holes in the ground, abandoned bird-nests, Ringtail Possum (<i>Pseudocheirus peregrinus</i>) dreys or thickets of vegetation, (e.g.

Species name	Common name	Credit type	Retained	Justification in BAM C if not retained (habitat characteristics - constraints)
				grass-tree skirts); nest-building appears to be restricted to breeding females; tree hollows are favoured but spherical nests have been found under the bark of eucalypts and in shredded bark in tree forks. Such habitat is absent and highly degraded due to the managed curtilage within the subject land.
<i>Petaurus norfolcensis</i>	Squirrel glider	Species	No	Habitat degraded: inhabits mature or old growth Blackbutt-Bloodwood forest with heath understorey in coastal areas. Prefers mixed species stands with a shrub or Acacia midstorey. Require abundant tree hollows for refuge and nest sites, which are absent from the subject land.
<i>Perameles nasuta</i> - Endangered Population in inner western Sydney	Long-nosed Bandicoot population in inner western Sydney	Species	No	Habitat degraded: Shelter mostly under older houses and buildings Forage in parkland and back-yards. There are apparently no large blocks of suitable habitat, likely to support a large source population, on the Cooks River to the south, or along the southern foreshore of Parramatta River and Sydney Harbour to the north. No evidence of this species located at the subject site. Not recorded in the Ku-ring-gai Council LGA
<i>Phascolarctus cinereus</i>	Koala	Species	No	Habitat degraded: Occurs in natural eucalypt forests and woodlands. Koala feed trees listed under Schedule 2 of SEPP 2020 legislation include: Forest red gum <i>Eucalyptus tereticornis</i> ; Tallowwood, <i>Eucalyptus microcorys</i> ; Grey Gum, <i>Eucalyptus punctata</i> ; Manna Gum, <i>Eucalyptus viminalis</i> ; River Red Gum, <i>Eucalyptus camaldulensis</i> ; Broad leaved scribbly gum, <i>Eucalyptus haemastoma</i> ; Scribbly gum and Swamp mahogany, <i>Eucalyptus robusta</i> . No Koala feed or Koala use trees occur on the subject land.
Flora				
<i>Acacia prominens</i>	Gosford		No	Habitat degraded: Species not found, managed curtilage

Species name	Common name	Credit type	Retained	Justification in BAM C if not retained (habitat characteristics - constraints)
-endangered population	wattle, Hurstville and Kogarah LGAs			
<i>Acacia pubescens</i>			No	Habitat degraded: Species not found, managed curtilage
<i>Callistemon linearifolius</i>			Yes	Habitat degraded: Species not found
<i>Darwinia peduncularis</i>			No	Habitat degraded: i.e., Managed curtilage, maintained exotic grassland dominated by Couch, Kikuyu and Buffalo Grass.
<i>Epacris purpurascens</i> var. <i>purpurascens</i>			No	Habitat degraded: i.e., Managed curtilage, maintained exotic grassland dominated by Couch and Buffalo Grass.
<i>Haloragodendron lucasii</i>			No	Habitat degraded and unsuitable: i.e., Managed curtilage
<i>Hibbertia puberula</i>			No	Habitat degraded: i.e., Managed curtilage
<i>Hibbertia spanatha</i>			No	Habitat degraded: i.e., Managed curtilage
<i>Lasiopetalum joyceaea</i>			No	Habitat degraded: i.e., Managed curtilage
<i>Leucopogon fletcheri</i>			No	Habitat degraded: i.e., Managed curtilage
<i>Marsdenia viridiflora</i> populations in western Sydney			No	Habitat degraded: i.e., Managed curtilage Does not occur in Ku-ring-gai Council LGA

Species name	Common name	Credit type	Retained	Justification in BAM C if not retained (habitat characteristics - constraints)
<i>Pomaderris prunifolia</i> – endangered population		Species	No	Geographic limitation: i.e., Managed curtilage
<i>Pterostylis saxicola</i>		Species	No	Habitat degraded: i.e., Managed curtilage
<i>Rhodamnia rubescens</i>		Species	No	Habitat degraded: Species not found
<i>Rhizanthella slateri</i>		Species	No	Habitat degraded: Species not found

4.3 Description of impacts

4.3.1 Direct impacts to subject site

The extent of land to be potentially impacted by the development is largely comprised of a long-established urbanised development with managed gardens and lawns with landscaped exotic species (Figures 7, 8, 9 & 10). Very few native species occur across the subject properties, these including small patches of grasses, forbs and ferns such as Native Violet, Basket Grass and Maidenhair Fern. A sapling of Cabbage Gum and one of White Cedar were also recorded (Figure 11).

Very little remnant vegetation representing a former distribution of Sydney Turpentine Ironbark Forest (STIF) remains, indicated currently only by the TPZ's of mature trees of Blue Gum and Sydney Red Gum, the root systems of some of which encroach into the subject properties (Figure 3 & 5). However, the development footprint avoids these TPZ's (Figures 3 & 5) and, as such, direct impacts to this former distribution of STIF is minimal.

4.3.2 Potential for runoff, erosion and sedimentation during construction

Construction activities could potentially encourage soil erosion and increase local sediment wash downslope when a house is constructed at the top of the slope.

Sediment fences along the gentle downslope contours would lessen these impacts.

Though unlikely, accidental leaks, oil spills, fuel, cement or other substances washed downslope could also act to pollute downstream water bodies (Lane Cove River Catchment).

A certified Construction Environment Management Plan (CEMP) must be provided with the approved application prior to issue of the Construction Certificate to address any of these potential issues.

4.3.3 Biodiversity Credits for PCT 32362 (Sydney Turpentine Ironbark Forest)

The vegetation community mapped by DCCEEW (2025) as occurring at the northern sections of the 4 properties (DCCEEW 2025) was based on previous occurrences of component tree species, of which none are retained at the subject site.

Sydney Turpentine Ironbark Forest in the Sydney Basin Bioregion, is listed as a Critically Endangered Ecological Community on registers of the BC Act (2016). A former remnant forest vegetation occurs in a highly degraded, floristically, structurally and functionally modified condition with very few representative species recorded as occurring in the assemblage (Appendix 1) (Figures 7, 8, 9 & 10).

This assessment (prepared using the BAM-C Offsets Calculator) has determined that for the potential clearing of 0.0121ha in area of some indicative species in a stand of former STIF, the

Vegetation Integrity Score is three (3), and no ecosystem credits are required to offset impacts to the removal of 0.0121ha of the highly modified vegetation of this subject site.

4.3.4 Serious and Irreversible Impacts (SAIIs)

Species and ecological communities with a 'very high' biodiversity risk weighting are considered to be a potential serious and irreversible impact (SAII). These 'potential SAI entities' are identified by the BAM calculator (BAM 2020).

The determination of serious and irreversible impacts on biodiversity values is to be made by the consent authority in accordance with the principles set out in the BC Regulation. To assist the consent authority, the guidance document 'Guidance to Assist a Decision Maker to determine a serious and irreversible impact' includes criteria that enable the application of the four principles set out in clause 6.7 of the BC Regulation. These criteria provide a guide to identify the species and ecological communities that are likely to be the subject of serious and irreversible impacts.

These four principles include the following (BC Regulation 2018):

An impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of a threatened species or ecological community becoming extinct because:

- (a) it will cause a further decline of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to be in a rapid rate of decline, or
- (b) it will further reduce the population size of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to have a very small population size, or
- (c) it is an impact on the habitat of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to have a very limited geographic distribution, or
- (d) the impacted species or ecological community is unlikely to respond to measures to improve its habitat and vegetation integrity and therefore its members are not replaceable.

For the purpose of this clause, a decline of a species or ecological community is a continuing or projected decline in:

- (a) an index of abundance appropriate to the taxon, or
- (b) the geographic distribution and habitat quality of the species or ecological community.

Sydney Turpentine Ironbark Forest (PCT 3262)

PCT 3262 in the Sydney Basin Bioregion is listed as a threatened entity with 96% of its distribution having already been cleared (DCCEEW 2025).

The clearing of the current vegetation assemblage that occurs at 19 - 25 Balfour Street, Lindfield, will have no effect on the present extent of STIF in the Sydney Basin Bioregion as the vegetation occurs in a highly floristically and structurally modified condition at the subject site with very few indicative species of the community present in the assemblage (Figures 7, 8, 9 & 10).

4.3.5 Potential Direct Impacts

4.3.5.1 Removal of vegetation and potential habitat

The impacts would include the potential removal of an area of approximately 0.0121ha of a highly modified, mostly exotic species assemblage at the subject site (Figures 7, 8, 9 & 10).

4.3.5.2 Potential for runoff, sedimentation and erosion during construction

Due to relatively gentle sloping ground surfaces of the subject land, construction activities could potentially lead to some soil erosion and increase in sediment load downslope.

The potential for accidental leaks/spills of oil, fuel, cement or other substances entering the downslope stream channel could potentially pollute ground water and downslope water bodies.

Sediment fences installed along downslope contours from construction activities would serve to reduce potential erosion of land surfaces and decrease the sediment wash downslope during clearing operations.

An approved Construction Environment Management Plan (CEMP) is required to be prepared for the proposal and be provided with the approved application prior to issue of the Construction Certificate to address these potential issues.

4.3.5.3 Potential temporary noise, dust, excessive lighting and vibration disturbance during construction period

The potential effects of temporary but excessive noise, dust, bright lighting and vibration disturbance during construction activities upon potential fauna activity are difficult to predict.

Potential impacts may include negative effects on predator-prey interactions and changes to roosting and breeding behaviours in the short term.

An approved Construction Environment Management Plan (CEMP) is required to be prepared for the proposal and be provided with the approved application prior to issue of the Construction Certificate to address these potential issues.

4.3.6 Indirect Impacts

Indirect impacts occur when the proposal or activities relating to the construction or operation of the proposal may affect adjacent or proximal areas of native vegetation, threatened ecological communities or threatened species habitat beyond the subject site (BAM 2020).

As such, it must be ensured that indirect impacts including the following are adequately constrained or minimised:

- a. inadvertent impacts on adjacent habitat or vegetation – adjacent vegetation will not be impacted. The TPZ of neighbouring trees will be avoided and vegetation clearing is limited to within the property boundaries of the subject site;
- b. reduced viability of adjacent habitat due to edge effects - edge effects can be minimised by appropriate management including fencing and weed control regimes;
- c. reduced viability of adjacent habitat due to noise, dust or light spill - light spill can be minimised by shining lights toward the ground, dust and sediment fences should be used to minimise noise and dust impacts to neighbouring residences;
- d. transport of weeds and pathogens from the site to adjacent vegetation - A vegetation Management Plan has been prepared for the proposal to address the removal and control of any weeds;
- e. increased risk of starvation or exposure, and loss of shade or shelter - minimal loss of shelter is considered to occur as a result of the proposal and a vegetation management/landscape plan should be prepared to compensate for any loss of shade/shelter;
- f. loss of breeding habitat - minimal loss of breeding habitat is considered to occur as a result of the proposal as there is none considered to be present at the site;
- g. trampling of threatened flora species - no threatened flora species would be impacted as these do not occur within the development footprint;
- h. fertiliser drift - care must be undertaken when using fertiliser around the building such that nutrient regimes beyond the development area are not compromised, increased nutrient status of soils may encourage weed colonisation at the expense of native species;
- i. rubbish dumping - unlikely to occur as the surrounds will be continually inhabited and less opportunity for inadvertent or deliberate rubbish dumping to occur;
- j. removal and disturbance of rocks, including bush rock – not applicable at the site;

h. increase in predators - it is requisite that predatory pets such as cats and dogs be kept restrained to avoid predation on native animals; and

i. increase in pest animal populations - pests such as rodents and feral avifauna should be removed and controlled should these opportunistically occur at the development site.

4.3.6.1 Hydrological changes

Potential indirect impacts to flora and fauna would include hydrological changes to the surface water-runoff flow. Any additional hard surface areas created as a result of the proposed construction would be expected to potentially result in some changes to the current hydrological regime. However, it would be proposed that all water run-off would be directed within the property to the current urban stormwater management system.

4.3.6.2 Introduction of pathogens

The introduction of pathogens may occur into the site and surrounding remnant bushland, via machinery, tools and equipment and clothing (i.e. boots). Diseases that require caution include Phytophthora (also known as Root Rot – type of water mould) and Myrtle Rust (*Puccinia psidii* – type of fungus). Simple procedures such as minimising entry points to the site and washing down tyres and boots before entry, minimise this risk.

4.3.6.3 Weed removal, future growth and invasion

The subject site includes well maintained gardens and lawns and very little weed occurrence was recorded. These minimal occurrences would be removed during clearing of the land.

Weeds will colonize and pioneer on any cleared grounds, so weed establishment must be managed throughout the duration of the project as well as on-going post works.

4.3.7 Prescribed and uncertain impacts

Prescribed impacts on biodiversity values includes any potential impacts that are not a result of direct vegetation clearing or construction development that have been prescribed by the Biodiversity Conservation Regulation (2017), these listed in Table 7 as follows:

Attributes or features of the habitat	Potential impacts	Actions to alleviate or ameliorate potential impacts
Species using caves, cliffs, karsts or crevices. Includes potential roosting sites for cave-dwelling microchiropterans	There are no caves, cliffs, karsts or crevices on or near the subject site.	N/A
Habitat of threatened species associated with rocks	There are no rocks in the subject site	N/A

Habitat of threatened species associated with man-made structures such as drainage pipes and earth dams	Some species of microchiropterans are known to roost in the eaves of buildings. None were observed at the subject site but have been recorded in the area.	Recommend removing building roofs sequentially in the evenings to allow bats to disperse prior to demolition.
Habitat of threatened species associated with non-native vegetation	Non-native vegetation will be removed as part of the development proposal.	No habitat for threatened species currently occurs at the subject site, however, revegetation of native species representative of STIF in any landscape plan may afford foraging and sheltering resources to avifauna
Connectivity of habitats within and between allotments facilitating movement of species across their range	Connectivity is not considered to be reduced by the proposal due to similar and better vegetation in surrounding properties	Revegetation of native species representative of STIF in any landscape plan may afford some degree of connectivity in the local area
Movement of threatened species required to maintain life cycles	No living canopy trees will be removed and no hollows exist in dead/dying trees to be removed so it is considered that the proposal will not further contribute to the decline in maintenance of life cycles, particularly with regard to avian fauna.	The proposal is unlikely to cause decline in maintenance of life cycles, particularly with regard to highly mobile avian and microchiropteran fauna
Hydrological regimes required to sustain threatened species	Not applicable.	N/A

Table 7 - List of potential prescribed impacts which may occur as a result of the proposed development.

4.3.8 Avoidance/minimisation of impacts

The major canopy elements of PCT 3262 – Sydney Turpentine Ironbark Forest (STIF) (DCCEEW 2025) occur in neighbouring allotments, with some TPZ's encroaching into the subject site (Figures 3 & 5). However, the development footprint avoids these root systems and these trees will not be impacted (Figures 3 & 5).

In order to further avoid and minimise the environmental impact of the proposed development, it is recommended to use up to 80% of species representative of Sydney Turpentine Ironbark Forest in any landscaping that is associated with the proposed development.

A Vegetation Management Plan has been prepared for the proposal which details management actions to protect any retained trees occurring adjacent to the construction footprint, as well as a weeding program to remove any invasive weeds from the property prior to and following potential construction.

4.3.9 Mitigation measures

4.3.9.1 Wildlife corridor/ revegetation

Native tree replanting commensurate with Sydney Turpentine Ironbark Forest assemblages will restore the long-term retention of canopy.

Species plantings in any landscape plan should include locally native species representative of Sydney Turpentine Ironbark Forest assemblages. This will provide greater foraging and nesting habitat for native species and will deliver greater biodiversity gain outcomes than currently occur at the subject site. The greatest ecological outcome is to recreate areas of Sydney Turpentine Ironbark Forest community where environmental criteria are favourable including trees, shrubs, native grasses and forbs.

4.3.9.2 Retaining mature trees at subject site

There are no mature individuals of canopy trees belonging to the Sydney Turpentine Ironbark Forest plant community occurring at the subject construction site (Naturally Trees 2025).

Species plantings in any landscape plan should include locally native species representative of Sydney Turpentine Ironbark Forest assemblages as this would act to reduce the minimal environmental impact of the proposed development.

5 IMPACT SUMMARY AND CONCLUSIONS

5.1 Serious and irreversible impacts (SAIIs)

OEH (2017) 'Guidance to Assist a Decision-maker to Determine a Serious and Irreversible Impact' lists the ecological communities and species that are 'potential serious and irreversible impact (SAII) entities'.

Sydney Turpentine Ironbark Forest (PCT 3262) occurring in the Ku-ring-gai LGA in the Sydney Basin Bioregion is listed as an endangered ecological community on registers of the BC Act (2016) and EPBC Act (1999).

PCT 3262 in the Sydney Basin Bioregion is listed as a threatened entity with 96% of its distribution having already been cleared (DCCEEW 2025).

The clearing of the current vegetation assemblage that occurs at 19 - 25 Balfour Street, Lindfield, will have no effect on the present extent of STIF in the Sydney Basin Bioregion as the vegetation occurs in a highly floristically and structurally modified condition at the subject site, with very few indicative species of the community present in the assemblage (Figures 7, 8, 9 & 10).

5.2 Impacts that require an Offset

Table 8 summarises the impact to areas of PCT 3234 that require an offset.

Vegetation Zone (Description)	PCT	Extent of potential area impacted	Current Vegetation Integrity Score (VIS)	Future Vegetation Integrity Score	Number of Ecosystem credits required
Highly floristically, structurally and functionally modified assemblage of plants at the subject site (mostly ornamental landscapings) with very few representative plant species of STIF present in the composition (Figures 7, 8, 9, 10 & 11)	3262	0.0121ha	3	0	0

Table 8 – Potential impact to PCT Areas

5.3 Conclusions of assessment

The proposed development is sited on land that has been historically cleared since well before 1943 (DCCEEW 2025), is highly degraded in relation to remnant native species, the vegetation composition of managed gardens and lawns dominated by exotic species landscaping (Figures 7, 8, 9, 10 & 11).

The vegetation structure is varied and consists of some dead/dying canopy trees, shrubs and ground cover plants that provide some shelter and foraging resources for avifauna, arboreal and ground dwelling mammals and reptiles.

No area of significant biodiversity value will be impacted by the proposal as the construction footprint avoids all TPZ's of neighbouring canopy trees (Figures 3 & 5).

A total of 7 indigenous flora species will be impacted by the development, however their current abundance and cover is very low, and only a few of these are representative of the currently mapped Plant Community Type Sydney Turpentine Ironbark Forest (PCTID 3262), a critically endangered ecological community under the BC Act (2016) and the EPBC Act (1999).

Several native trees that were representative of the PCT are dead, so it is considered that the vegetation at the subject site is no longer representative of the Sydney Turpentine Ironbark Forest Plant Community.

The retention of the individual of Lilly Pilly along the Council verge along Balfour Street and the root systems of trees in the adjacent properties at 17 Balfour Street and 18 and 14 Highfield Road, Lindfield (Figure 5, Naturally Trees 2025) avoids impact to significant elements of biodiversity value at the subject site.

Bionet (2025) returned 15 potential flora species of conservation significance that have been recorded within 5km of the subject site within the last 20 years, however a targeted search for these did not locate any of these individuals.

Seven High Threat Weed species was recorded at the site.

Bionet (2025) returned 34 potential fauna species conservation significance that have been recorded within 5km of the subject site within the last 20 years. Two of these (microchiropterans) were potentially recorded foraging on the site, however a definite identification could not be obtained due to the quality of the bat call.

Bandicoot diggings were found in adjacent properties but not in the any at the subject site.

The subject site has been mapped as having significant biodiversity value by the Biodiversity Conservation Regulation based on the mapping as a threatened ecological community. This

triggers the Biodiversity Offsets Scheme (BOS), However, ground truthing by ACS has concluded that the subject site is no longer representative of PCT 3262.

It is considered that no threatened entities will be impacted by the proposal.

Species plantings in any landscape plan should include locally native species representative of Sydney Turpentine Ironbark Forest assemblages. This will provide greater foraging and nesting habitat for common native species and will deliver greater biodiversity gain outcomes than currently occur at the subject site. The greatest ecological outcome is to recreate areas of Sydney Turpentine Ironbark Forest community where environmental criteria are favourable including trees, shrubs, native grasses and forbs.

6 BIODIVERSITY CREDIT REPORT (LIKE FOR LIKE)

For the proposed Transit-Orientated Development at 19 - 25 Balfour Street, Lindfield, an area of 0.0121ha of plant species indicative of the STIF ecological community in a highly degraded condition, is proposed to be cleared (Naturally Trees 20245) (Figures 7, 8, 9, 10 & 11).

The vegetation is assessed as having a very low floristic, low structural and very low functional integrity in the canopy tree, shrub and ground strata.

There is very low composition of natural species in the assemblage, a very low spread of tree DBH sizes with no regeneration occurring.

The Vegetation Integrity Score is only 3% (Table 5)

The Biodiversity Credit Report for the proposal is as follows:



BAM Biodiversity Credit Report (Like for like)

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00057567/BAAS24033/25/00057568	19-25 Balfour St Lindfield	28/10/2024
Assessor Name	Assessor Number	BAM Data version *
Josie Drevon	BAAS24033	Current classification (live - default) (80)
Proponent Names	Report Created	BAM Case Status
Aries Xu	21/05/2025	Finalised
Assessment Revision		Assessment Type
0		Major Projects
Date Finalised	* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.	
21/05/2025		

Potential Serious and Irreversible Impacts

Name of threatened ecological community	Listing status	Name of Plant Community Type/ID
Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion	Critically Endangered Ecological Community	3262-Sydney Turpentine Ironbark Forest
Species		
Nil		

Assessment Id	Proposal Name
00057567/BAAS24033/25/00057568	19-25 Balfour St Lindfield

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BAM Biodiversity Credit Report (Like for like)

Additional Information for Approval

PCT Outside Ibra Added

None added

PCTs With Customized Benchmarks

PCT

No Changes

Predicted Threatened Species Not On Site

Name

Calyptrorhynchus lathami lathami / South-eastern Glossy Black-Cockatoo

Ephippiorhynchus asiaticus / Black-necked Stork

Grantiella picta / Painted Honeyeater

Ixobrychus flavicollis / Black Bittern

Haliaeetus leucogaster / White-bellied Sea-Eagle

Pycnoptilus floccosus / Pilotbird

Ecosystem Credit Summary (Number and class of biodiversity credits to be retired)

Assessment Id

00057567/BAAS24033/25/00057568

Proposal Name

19-25 Balfour St Lindfield

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BAM Biodiversity Credit Report (Like for like)

Name of Plant Community Type/ID	Name of threatened ecological community	Area of impact	HBT Cr	No HBT Cr	Total credits to be retired
3262-Sydney Turpentine Ironbark Forest	Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion	0.0	0	0	0

3262-Sydney Turpentine Ironbark Forest	Like-for-like credit retirement options					
	Name of offset trading group	Trading group	Zone	HBT	Credits	IBRA region
	Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion This includes PCT's: 3262	-	3262_Urbanised	No	0	Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi and Yengo. or Any IBRA subregion that is within 100 kilometers of the outer edge of the impacted site.

Species Credit Summary

No Species Credit Data

Credit Retirement Options

Like-for-like credit retirement options

Assessment Id	Proposal Name	Page 3 of 3
00057567/BAAS24033/25/00057568	19-25 Balfour St Lindfield	

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Appendix 1 - Species occurrence at 19 - 25 Balfour Street, Lindfield

KEY Status pl – planted in landscape * - exotic HTW - High Threat Weed Vegetation No definable ecological community (PCTid = 0) Relative presence ranking within range of properties * - uncommon or occasional ** - relatively common *** - common or abundant

STATUS	SCIENTIFIC NAME	COMMON NAME	TREES ON COUNCIL VERGES	PLANTS IN MANAGED CURTILAGE OF 19-25 BALFOUR STREETR	PLANTS IN ADJOINING PROPERTIES
*	FILICOPSIDA				
	Davalliaceae				
	<i>Nephrolepis cordifolia</i>	Fishbone Fern		**	
	Dicksoniaceae				
	<i>Calochlaena dubia</i>	Soft Bracken		*	
pl	Polypodiaceae				
	<i>Platynerium bifurcatum</i>	Elkhorn		*	
	Pteridaceae				
	<i>Adiantum aethiopicum</i>	Common Maidenhair		*	
	<i>Adiantum hispidulum</i>	Rough Maidenhair			**
	GYMNOSPERMAE:				
	CONIFERALES				
*pl	Cupressaceae				
	<i>Cupressus sp.</i>	Cypress Pine		**	
*pl	<i>Cupressus sempervirens</i>	Italian Cypress		*	
*pl	<i>Cupressocyparis leylandii</i>	Leyland Cypress		*	
pl	Zamiaceae				
	<i>Macrozamia communis</i>	Burrawang		*	

STATUS	SCIENTIFIC NAME	COMMON NAME	TREES ON COUNCIL VERGES	PLANTS IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	PLANTS IN ADJOINING PROPERTIES
	MAGNOLIOPSIDA: MAGNOLIDAE				
	Araliaceae				
*	<i>Hedera helix</i>	English Ivy		*	
	Asteraceae				
*	<i>Conyza bonariensis</i>	Flaxleaf Fleabane		**	
	Begoniaceae				
*pl	<i>Begonia sp.</i>	Begonia		***	
	Berberidaceae				
*pl	<i>Nandina domestica</i>	Sacred Bamboo		*	
	Betulaceae				
*pl	<i>Betula nigra</i>	River Birch		*	
	Bignoniaceae				
*pl	<i>Jacaranda mimosifolia</i>	Jacaranda	***	*	
	Bromeliaceae				
*pl	<i>Neoregelia carolinae</i>	Neoregelia		*	
	Buxaceae				
*pl	<i>Buxus microphylla</i>	Buxus		***	
	Cannabaceae				
*pl	<i>Celtis sinensis</i>	Hackberry			***
	Caprifoliaceae				
*pl	<i>Abelia chinensis</i>	Abelia		*	
	Casuarinaceae				
pl	<i>Casuarina cunninghamiana</i>	River Oak			*
	Crassulaceae				
*pl	<i>Aeonium sp</i>	Tree houseleek		*	

STATUS	SCIENTIFIC NAME	COMMON NAME	TREES ON COUNCIL VERGES	PLANTS IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	PLANTS IN ADJOINING PROPERTIES
*pl	Fagaceae <i>Quercus robur</i>	English Oak	*		*
*pl	Hydrangeaceae <i>Hydrangea macrophylla</i>	Garden Hydrangea		***	
*	Lamiaceae <i>Plectranthus ciliata</i>			*	
*pl	Lythraceae <i>Lagerstroemia indica</i>	Crepe Myrtle		*	
*pl	Magnoliaceae <i>Magnolia grandiflora</i>	Southern Magnolia		***	
*pl	<i>Magnolia soulangeana</i>	Magnolia		*	
	Meliaceae <i>Melia azederach</i>	White Cedar		*	
*pl	Melastomataceae <i>Pleroma urvilleanum</i>	Tibouchina		*	
*pl	Moraceae <i>Ficus pumila</i>	Creeping Fig		**	
	Myrtaceae <i>Acmena smithii</i>	Lilly Pilly	*		
	<i>Angophora costata</i>	Sydney Red Gum			*
pl	<i>Callistemon citrinus</i>	Lemon-scented Bottlebrush		* (hedge)	
	<i>Callistemon salignus</i>	Sweet-willow Bottlebrush			*
	<i>Corymbia maculata</i>	Spotted Gum			*
	Myrtaceae <i>Eucalyptus saligna</i> X <i>E. botryoides</i> #	Sydney Bluegum X Coastal Mahogany			***
	<i>Eucalyptus</i> sp.	Eucalypt		*	
pl	<i>Leptospermum petersonii</i>	Lemon-scented Teatree		*	*

STATUS	SCIENTIFIC NAME	COMMON NAME	TREES ON COUNCIL VERGES	PLANTS IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	PLANTS IN ADJOINING PROPERTIES
*pl	Oleaceae <i>Jasminum mesneyi</i>	Primrose Jasmine		*	
*	<i>Trachelospermum asiaticum</i>	Star Jasmine		*	
	Oxalidaceae <i>Oxalis corniculata</i>	Oxalis		*	
pl	Proteaceae <i>Macadamia tetraphylla</i>	Macadamia Nut			*
	Rhamnaceae <i>Alphitonia excelsa</i>	Red Ash	**		
*pl	Rosaceae <i>Eriobotrya japonica</i>	Loquat		*	
*pl	<i>Pyrus calleryana</i>	Callery Pear		*	
*pl	Rubiaceae <i>Gardenia florida</i>	Gardenia		**	
*pl	Rutaceae <i>Murraya paniculata</i>	Orange Jessamine		***	
*pl	Sapindaceae <i>Acer buergerianum</i>	Trident Maple		*	
*pl	<i>Acer negundo</i>	Box Elder	*		
*pl	<i>Acer palmatum</i>	Japanese Maple		**	
*	Solanaceae <i>Solanum mauritianum</i>	Tobacco Bush		*	
*	<i>Solanum nigrum</i>	Black Nightshade		*	
*pl	Theaceae <i>Camellia sasanqua</i>	Camellia		**	
*pl	<i>Gordonia axillaris</i>	Fried Egg Plant		*	
	Violaceae <i>Viola hederacea</i> f. F	Ivy-leaved Violet		*	

STATUS	SCIENTIFIC NAME	COMMON NAME	TREES ON COUNCIL VERGES	PLANTS IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	PLANTS IN ADJOINING PROPERTIES
*	<i>Viola odorata</i>	Sweet Violet		*	
	MAGNOLOPSIDA: LILIDAE				
	Agavaceae				
*pl	<i>Yucca brevifolia</i>	Joshua Tree		*	
	Amaryllidaceae				
*	<i>Clivia miniata</i>	Clivia		**	
	Araceae				
*	<i>Colocasia esculenta</i>	Taro		*	
*	<i>Monstera deliciosa</i>	Fruit Salad Plant			*
*	<i>Philodendron xanadu</i>	Philodendron xanadu		*	
	Arecaceae				
*pl	<i>Archontophoenix alexandrae</i>	Northern Bangalow Palm		**	
*pl	<i>Howea forsteriana</i>	Kentia Palm		**	
	<i>Livistona australis</i>	Cabbage Tree Palm		**	
*pl	<i>Rhaphis excelsa</i>	Broad-leaved Lady Palm		***	
*pl	<i>Syagrus romanzoffianum</i>	Queen Palm		**	
	Asparagaceae				
HTW	<i>Asparagus aethiopicus</i>	Ground Asparagus Fern		*	
	Cannaceae				
*	<i>Canna indica</i>	Indian Shot Plant		*	
	Commelinaceae				
HTW	<i>Tradescantia fluminensis</i>	Wandering Jew		*	
	Cyperaceae				
*	<i>Cyperus eragrostis</i>	Umbrella Sedge		*	
	Doryanthaceae				
pl	<i>Doryanthes excelsa</i>	Gynea Lily			*

STATUS	SCIENTIFIC NAME	COMMON NAME	TREES ON COUNCIL VERGES	PLANTS IN MANAGED CURTILAGE OF 19-25 BALFOUR STREET	PLANTS IN ADJOINING PROPERTIES
	Iridaceae				
*	<i>Agapanthus praecox</i>	Agapanthus		***	***
*	<i>Crocasmia x crocosmiiflora</i>	Montbretia		*	
*	<i>Dietes bicolor</i>	Fortnight Lily		**	
	Poaceae				
HTW	<i>Cenchrus clandestinus</i>	Kikuyu		***	***
HTW	<i>Cenchrus setaceus</i>	Fountain Grass		*	
HTW	<i>Ehrharta erecta</i>	African Veldt Grass		**	
*pl	<i>Ophiopogon japonicus</i>	Mondo Grass		*	
	<i>Oplismenus aemulus</i>	Basket Grass		*	**
HTW	<i>Phyllostachys nigra</i>	Black Bamboo		*	
*	<i>Stenotaphrum secundatum</i>	Buffalo Grass		***	
	Strelitzaceae				
*pl	<i>Strelitzia nicolai</i>	Wild Banana		**	
*pl	<i>Strelitzia reginae</i>	Crane Flower		*	
	Zingiberaceae				
pl	<i>Alpinia caerulea</i>	Native Ginger		*	
*	<i>Hedychium gardnerianum</i>	Wild Ginger			*

Appendix 2 - BAAS Profile for J Drevon

Department of Climate Change, Energy, the Environment and Water



CERTIFICATE OF ACCREDITATION AS A BIODIVERSITY ASSESSMENT METHOD ASSESSOR under the *Biodiversity Conservation Act 2016* (NSW)

BAM Assessor		
Josie Drevon		
Accreditation number	Accreditation date (Date of issue)	Expiry Date of
BAAS24033	September 26, 2024	September 25, 2027

The person named above is accredited under section 6.10 of the *Biodiversity Conservation Act 2016* (NSW) (**BC Act**) as a Biodiversity Assessment Method Assessor to apply the Biodiversity Assessment Method in connection with the preparation of biodiversity stewardship site assessment reports, biodiversity development assessment reports and biodiversity certification assessment reports pursuant to Part 6 of the BC Act.

The accreditation is in force until and including the Expiry Date. The accreditation is subject to the conditions set out in the *Accreditation Scheme for the Application of the Biodiversity Assessment Method*, under the BC Act, and the conditions specified on the reverse of this certificate.

A handwritten signature in blue ink, appearing to read "Steen Gyrn".

STEEN GYRN

Senior Team Leader, Accreditation and Training
Biodiversity and Conservation Division | Department of Climate Change, Energy, the Environment and Water

NOTES

- DCCEEW maintains a register of Accredited Biodiversity Assessment Method (BAM) Assessors accessible from the DCCEEW website.
- The BAM Assessor's accreditation expires on the Expiry Date unless renewed in accordance with the *Accreditation Scheme for the Application of the Biodiversity Assessment Method*. It is the BAM Assessor's responsibility to monitor the Expiry Date of their accreditation, and apply for any renewal with sufficient time for the application to be processed prior to the Expiry Date.
- Words and expressions used in this accreditation instrument and which are also used in the Act have the same meaning.

Appendix 3 - BAM Summary Reports



BAM Credit Summary Report

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00057567/BAAS24033/25/00057568	19-25 Balfour St Lindfield	28/10/2024
Assessor Name	Report Created	BAM Data version *
Josie Drevon	21/05/2025	Current classification (live - default) (80)
Assessor Number	BAM Case Status	Date Finalised
BAAS24033	Finalised	21/05/2025
Assessment Revision		Assessment Type
0		Major Projects

* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

Ecosystem credits for plant communities types (PCT), ecological communities & threatened species habitat

Zone	Vegetation zone name	TEC name	Current Vegetation integrity score	Change in Vegetation integrity (loss / gain)	Area (ha)	Sensitivity to loss (Justification)	Species sensitivity to gain class	BC Act Listing status	EPBC Act listing status	Biodiversity risk weighting	Potential SAIL	Ecosystem credits
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BAM Credit Summary Report

Sydney Turpentine Ironbark Forest

1	3262_Urbanised	Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion	3	3.0	0.01	Population size	High Sensitivity to Gain	Critically Endangered Ecological Community	Not Listed	2.50	True	0
											Subtotal	0
											Total	0

Species credits for threatened species

Vegetation zone name	Habitat condition (Vegetation Integrity)	Change in habitat condition	Area (ha)/Count (no. individuals)	Sensitivity to loss (Justification)	Sensitivity to gain (Justification)	BC Act Listing status	EPBC Act listing status	Potential SAI	Species credits
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Assessment Id

00057567/BAAS24033/25/00057568

Proposal Name

19-25 Balfour St Lindfield

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BAM Biodiversity Credit Report (Variations)

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00057567/BAAS24033/25/00057568	19-25 Balfour St Lindfield	28/10/2024
Assessor Name	Assessor Number	BAM Data version *
Josie Drevon	BAAS24033	Current classification (live - default) (80)
Proponent Name(s)	Report Created	BAM Case Status
Aries Xu	21/05/2025	Finalised
Assessment Revision		Assessment Type
0		Major Projects
Date Finalised	* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.	
21/05/2025		

Potential Serious and Irreversible Impacts

Name of threatened ecological community	Listing status	Name of Plant Community Type/ID
Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion	Critically Endangered Ecological Community	3262-Sydney Turpentine Ironbark Forest
Species		
Nil		

Additional Information for Approval

PCT Outside Ibra Added
None added

BAM Biodiversity Credit Report (Variations)

PCTs With Customized Benchmarks

PCT

No Changes

Predicted Threatened Species Not On Site

Name

Calyptrorhynchus lathami lathami / South-eastern Glossy Black-Cockatoo

Ephippiorhynchus asiaticus / Black-necked Stork

Grantiella picta / Painted Honeyeater

Ixobrychus flavicollis / Black Bittern

Haliaeetus leucogaster / White-bellied Sea-Eagle

Pycnoptilus floccosus / Pilotbird

Ecosystem Credit Summary (Number and class of biodiversity credits to be retired)

Name of Plant Community Type/ID	Name of threatened ecological community	Area of impact	HBT Cr	No HBT Cr	Total credits to be retired
3262-Sydney Turpentine Ironbark Forest	Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion	0.0	0	0	0.00
3262-Sydney Turpentine Ironbark Forest	Like-for-like credit retirement options				
	Class	Trading group	Zone	HBT	Credits
	Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion This includes PCT's: 3262	-	3262_Urbanised	No	0
					Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi and Yengo. or Any IBRA subregion that is within 100 kilometers of the outer edge of the impacted site.

Assessment Id

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BAM Biodiversity Credit Report (Variations)

Species Credit Summary

No Species Credit Data

Credit Retirement Options

Like-for-like options

Assessment Id

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Proposal Name

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Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00057567/BAAS24033/25/00057568	19-25 Balfour St Lindfield	28/10/2024
Assessor Name	Report Created	BAM Data version *
Josie Devon	21/05/2025	Current classification (live - default) (80)
Assessor Number	Assessment Type	BAM Case Status
BAAS24033	Major Projects	Finalised
Assessment Revision		Date Finalised
0		21/05/2025

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List of Species Requiring Survey

Name	Presence	Survey Months
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Threatened species Manually Added

None added

Threatened species assessed as not on site

Refer to BAR for detailed justification

Common name	Scientific name	Justification in the BAM-C
Barking Owl	Ninox connivens	Habitat degraded Habitat constraints
Bush Stone-curlew	Burhinus grallarius	Habitat degraded Habitat constraints
Cumberland Plain Land Snail	Meridolum comeovirens	Habitat degraded
Darwinia peduncularis	Darwinia peduncularis	Habitat degraded Habitat constraints
Downy Wattle	Acacia pubescens	Habitat degraded
Dural Land Snail	Pommerhelix duralensis	Habitat degraded
Eastern Australian Underground Orchid	Rhizanthella slateri	Habitat degraded

BAM Candidate Species Report

Eastern Osprey	<i>Pandion cristatus</i>	Habitat degraded Habitat constraints
Eastern Pygmy-possum	<i>Cercartetus nanus</i>	Habitat degraded
<i>Epacris purpurascens</i> var. <i>purpurascens</i>	<i>Epacris purpurascens</i> var. <i>purpurascens</i>	Habitat degraded
Gang-gang Cockatoo	<i>Callocephalon fimbriatum</i>	Habitat degraded Habitat constraints
Gosford Wattle, Hurstville and Kogarah Local Government Areas	<i>Acacia prominens</i> - endangered population	Habitat degraded
Green and Golden Bell Frog	<i>Litoria aurea</i>	Habitat degraded Habitat constraints
Grey-headed Flying-fox	<i>Pteropus poliocephalus</i>	Habitat degraded Habitat constraints
<i>Haloragodendron lucasii</i>	<i>Haloragodendron lucasii</i>	Habitat degraded Habitat constraints Geographic limitations
<i>Hibbertia puberula</i>	<i>Hibbertia puberula</i>	Habitat degraded
Julian's Hibbertia	<i>Hibbertia spanantha</i>	Habitat degraded
Koala	<i>Phascolarctos cinereus</i>	Habitat degraded Habitat constraints
Large Bent-winged Bat	<i>Miniopterus orianae oceanensis</i>	Habitat degraded Habitat constraints
Large-eared Pied Bat	<i>Chalinolobus dwyeri</i>	Habitat degraded Habitat constraints
<i>Lasiopetalum joyceae</i>	<i>Lasiopetalum joyceae</i>	Habitat degraded
<i>Leucopogon fletcheri</i> subsp. <i>fletcheri</i>	<i>Leucopogon fletcheri</i> subsp. <i>fletcheri</i>	Habitat degraded Habitat constraints
Little Bent-winged Bat	<i>Miniopterus australis</i>	Habitat degraded Habitat constraints
Little Eagle	<i>Hieraaetus morphnoides</i>	Habitat degraded Habitat constraints
Long-nosed Bandicoot population in inner western Sydney	<i>Perameles nasuta</i> - endangered population	Habitat degraded
<i>Marsdenia viridiflora</i> R. Br. subsp. <i>viridiflora</i> population in the Bankstown, Blacktown, Camden, Campbelltown, Fairfield, Holroyd, Liverpool and Penrith local government areas	<i>Marsdenia viridiflora</i> subsp. <i>viridiflora</i> - endangered population	Habitat degraded

Assessment Id

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Proposal Name

19-25 Balfour St Lindfield

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BAM Candidate Species Report

Masked Owl	<i>Tyto novaehollandiae</i>	Habitat degraded Habitat constraints
Netted Bottle Brush	<i>Callistemon linearifolius</i>	Habitat degraded
<i>P. prunifolia</i> in the Parramatta, Auburn, Strathfield and Bankstown Local Government Areas	<i>Pomaderris prunifolia</i> - endangered population	Habitat degraded
Powerful Owl	<i>Ninox strenua</i>	Habitat degraded Habitat constraints
Red-crowned Toadlet	<i>Pseudophryne australis</i>	Habitat degraded
Regent Honeyeater	<i>Anthochaera phrygia</i>	Habitat degraded Habitat constraints
Scrub Turpentine	<i>Rhodamnia rubescens</i>	Habitat degraded
South-eastern Glossy Black-Cockatoo	<i>Calyptorhynchus lathami lathami</i>	Habitat degraded Habitat constraints
Southern Myotis	<i>Myotis macropus</i>	Habitat degraded Habitat constraints
Square-tailed Kite	<i>Lophoictinia isura</i>	Habitat degraded Habitat constraints
Squirrel Glider	<i>Petaurus norfolcensis</i>	Habitat degraded
Swift Parrot	<i>Lathamus discolor</i>	Habitat degraded Habitat constraints
White-bellied Sea-Eagle	<i>Haliaeetus leucogaster</i>	Habitat degraded Habitat constraints

BAM Predicted Species Report

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00057567/BAAS24033/25/00057568	19-25 Balfour St Lindfield	28/10/2024
Assessor Name	Report Created	BAM Data version *
Josie Drevon	21/05/2025	Current classification (live - default) (80)
Assessor Number	Assessment Type	BAM Case Status
BAAS24033	Major Projects	Finalised
Assessment Revision		Date Finalised
0		21/05/2025

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Threatened species reliably predicted to utilise the site. No surveys are required for these species. Ecosystem credits apply to these species.

Common Name	Scientific Name	Vegetation Types(s)
Black-chinned Honeyeater (eastern subspecies)	Melithreptus gularis gularis	3262-Sydney Turpentine Ironbark Forest
Brown Treecreeper (eastern subspecies)	Climacteris picumnus victoriae	3262-Sydney Turpentine Ironbark Forest
Diamond Firetail	Stagonopleura guttata	3262-Sydney Turpentine Ironbark Forest
Dusky Woodswallow	Artamus cyanopterus cyanopterus	3262-Sydney Turpentine Ironbark Forest
Eastern Coastal Free-tailed Bat	Micronomus norfolkensis	3262-Sydney Turpentine Ironbark Forest
Eastern Osprey	Pandion cristatus	3262-Sydney Turpentine Ironbark Forest
Flame Robin	Petroica phoenicea	3262-Sydney Turpentine Ironbark Forest
Gang-gang Cockatoo	Callocephalon fimbriatum	3262-Sydney Turpentine Ironbark Forest
Grey-headed Flying-fox	Pteropus poliocephalus	3262-Sydney Turpentine Ironbark Forest

BAM Predicted Species Report

Large Bent-winged Bat	<i>Miniopterus orianae oceanensis</i>	3262-Sydney Turpentine Ironbark Forest
Little Bent-winged Bat	<i>Miniopterus australis</i>	3262-Sydney Turpentine Ironbark Forest
Little Eagle	<i>Hieraaetus morphnoides</i>	3262-Sydney Turpentine Ironbark Forest
Little Lorikeet	<i>Glossopsitta pusilla</i>	3262-Sydney Turpentine Ironbark Forest
Regent Honeyeater	<i>Anthochaera phrygia</i>	3262-Sydney Turpentine Ironbark Forest
Rosenberg's Goanna	<i>Varanus rosenbergi</i>	3262-Sydney Turpentine Ironbark Forest
South-eastern Hooded Robin	<i>Melanodryas cucullata cucullata</i>	3262-Sydney Turpentine Ironbark Forest
Speckled Warbler	<i>Chthonicola sagittata</i>	3262-Sydney Turpentine Ironbark Forest
Spotted-tailed Quoll	<i>Dasyurus maculatus</i>	3262-Sydney Turpentine Ironbark Forest
Square-tailed Kite	<i>Lophoictinia isura</i>	3262-Sydney Turpentine Ironbark Forest
Swift Parrot	<i>Lathamus discolor</i>	3262-Sydney Turpentine Ironbark Forest
Varied Sittella	<i>Daphoenositta chrysoptera</i>	3262-Sydney Turpentine Ironbark Forest
White-throated Needle-tail	<i>Hirundapus caudacutus</i>	3262-Sydney Turpentine Ironbark Forest
Yellow-bellied Sheath-tail-bat	<i>Saccolaimus flaviventris</i>	3262-Sydney Turpentine Ironbark Forest

Threatened species Manually Added

None added

Threatened species assessed as not within the vegetation zone(s) for the PCT(s)

Common Name	Scientific Name	Plant Community Type(s)
Black Bittern	<i>Ixobrychus flavicollis</i>	3262-Sydney Turpentine Ironbark Forest
Black-necked Stork	<i>Ephippiorhynchus asiaticus</i>	3262-Sydney Turpentine Ironbark Forest
Painted Honeyeater	<i>Grantiella picta</i>	3262-Sydney Turpentine Ironbark Forest
Pilotbird	<i>Pycnoptilus floccosus</i>	3262-Sydney Turpentine Ironbark Forest
South-eastern Glossy Black-Cockatoo	<i>Calyptorhynchus lathami lathami</i>	3262-Sydney Turpentine Ironbark Forest

BAM Predicted Species Report

White-bellied Sea-Eagle	Haliaeetus leucogaster	3262-Sydney Turpentine Ironbark Forest
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Threatened species assessed as not within the vegetation zone(s) for the PCT(s)

Refer to BAR for detailed justification

Common Name	Scientific Name	Justification in the BAM-C
Black Bittern	<i>Ixobrychus flavicollis</i>	Habitat constraints
Black-necked Stork	<i>Ephippiorhynchus asiaticus</i>	Habitat constraints
Painted Honeyeater	<i>Grantiella picta</i>	Habitat constraints
Pilotbird	<i>Pycnoptilus floccosus</i>	Refer to BAR
South-eastern Glossy Black-Cockatoo	<i>Calyptorhynchus lathami lathami</i>	Habitat constraints
White-bellied Sea-Eagle	<i>Haliaeetus leucogaster</i>	Habitat constraints

BAM Vegetation Zones Report

Proposal Details

Assessment Id	Assessment name	BAM data last updated *
00057567/BAAS24033/25/00057568	19-25 Balfour St Lindfield	28/10/2024
Assessor Name	Report Created	BAM Data version *
Josie Drevon	21/05/2025	Current classification (live - default) (80)
Assessor Number	Assessment Type	BAM Case Status
BAAS24033	Major Projects	Finalised
Assessment Revision		Date Finalised
0		21/05/2025

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Vegetation Zones

#	Name	PCT	Condition	Area	Minimum number of plots	Management zones
1	3262_Urbanised	3262-Sydney Turpentine Ironbark Forest	Urbanised	0.01	1	

Assessment Id	Proposal Name
00057567/BAAS24033/25/00057568	19-25 Balfour St Lindfield