

20 November 2025

ELA ref: 25SYD10819

Homes NSW
4 Parramatta Square
12 Darcy Street
Parramatta, NSW 2150

Attention: Nick Hill, Project Director - Portfolio Development Nicholas.Hill@homes.nsw.gov.au

Re: Site 1: 68-80 Beauchamp Road, Hillsdale – Biodiversity Development Assessment Report (BDAR) Waiver Request

Eco Logical Australia Pty Ltd (ELA) was engaged by Homes NSW (the proponent) to provide an assessment of biodiversity impacts associated for a proposed affordable housing State Significant Development Application (SSDA) located at 68-80 Beauchamp Road, Hillsdale (herein referred to as the 'study area'). The study area encompasses the Lot number and Deposited Plan (DP) Lot 12/-/DP736905 (Figure 1).

The SSDA is for the construction of two new 7-8 storey residential flat buildings. Initial review of aerial imagery showed limited vegetation within the study area and surroundings that is likely to have been planted around the time of the original development (Figure 1). Therefore, the thresholds for triggering a BDAR are unlikely to be met in this instance and a BDAR waiver appears to be the appropriate assessment pathway.

Legislative context

State Significant Development (SSD) and State Significant Infrastructure (SSI) are regulated under the *Environmental Planning and Assessment Act 1979* (EP&A Act). The EP&A Act requires proponents to apply to the Minister of Planning for development consent for SSD or SSI, supported by an Environmental Impact Statement (EIS). These applications are also subject to biodiversity assessment requirements under the *Biodiversity Conservation Act 2016* (BC Act). The BC Act requires that an SSD or SSI application must be accompanied by a biodiversity development assessment report (BDAR) *unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values*. This is referred to as a BDAR waiver.

This letter provides an assessment of the proposal's impact on biodiversity values, within the study area, in accordance with the NSW Department of Planning, Industry and Environment's (DPIE) 2019 guidelines under *How to apply for a biodiversity development assessment report waiver for a Major Project Application* (DPIE 2019). Information to support the application is outlined in Table 1 and Table 2 below.

The assessment includes a literature and database review of relevant information to assess the potential impacts to biodiversity values from the proposed development. This includes the review of recent

vegetation mapping (NSW DCCEEW 2025a), the Biodiversity Values Map (NSW DCCEEW 2025b), and BioNet Atlas threatened flora and fauna records within 5 km of the study area (NSW DCCEEW 2025c).

A field survey was conducted on 12 August 2025 by ELA ecologists Hamish Pritchard and Kacey Tada. However, access into the study area was not granted at the time of the field survey, and the study area was observed from publicly accessible areas around each of the sites, using footpaths, reserves, neighbouring parkland, and communal and common open spaces. Any portions of the study area that could not be surveyed from publicly accessible areas have been assessed via a desktop assessment, with assumptions made on vegetation present and potential threatened species habitat in buildings within the study area that were unable to be assessed during the field survey. This assessment assumes the study area does not contain any vegetation that could be assigned to a plant community type (PCT).

The field survey identified multiple entry points into internal roof cavities, and into internal brick wall cavities that could allow microbats access into the buildings to utilise as roosting habitat. No signs of potential microbat use (such as guano or staining) were observed during the field surveys. Following feedback from the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW), emergence surveys were conducted by two ELA ecologists on 18 November 2025 to determine whether bats were utilising buildings within the study area as habitat. Emergence surveys commenced 30 minutes prior to sunset and concluded one hour after sunset. No microbats were recorded during the survey occurring within the study area.

Additionally, a likelihood of occurrence assessment was undertaken to determine whether the study area may be used by threatened microbat species (Appendix A). Given the location of the project, the low number of records of threatened microbat species within 5 km of the study area, and the limited amount of remnant native vegetation or preferred habitat for these species, it is considered unlikely that these species would actively utilise the buildings for habitat.

The assessment concluded that the proposed development is unlikely to have a significant impact on biodiversity values listed under the BC Act, following implementation of the above additional surveys prior to works commencing for the project.

Additionally, no Matters of National Environmental Significance (MNES) listed under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) are likely to be significantly affected by the development. The proponent requests a waiver from the need to submit a BDAR.

Regards,



Hamish Pritchard
Ecologist

1. Background

1.1 Introduction

The following project description has been provided by Homes NSW (the Proponent).

This BDAR Waiver Request is submitted to the Department of Planning, Housing and Infrastructure (DPHI) on behalf of the Proponent to support a State Significant Development Application (SSDA) for a residential development at 68-80 Beauchamp Road, Hillsdale (the study area). The proposed development includes:

- Demolition of all existing structures on the site, tree removal, excavation and site preparation works,
- Construction of two residential flat buildings of 7-8 storeys with basement car parking,
- Associated landscaping and communal open space.

1.2 Assessment

Field survey was undertaken by ELA ecologists Hamish Pritchard and Kacey Tada on 12 August 2025 to assess whether potential remnant native vegetation or habitat for threatened fauna was present within the study area. (i.e. along Beauchamp Road). However, access into the study area was not granted at the time of the field survey, and the study area was observed from publicly accessible areas around each of the sites, using footpaths, reserves, neighbouring parkland, and communal and common open spaces. Any portions of the study area that could not be surveyed from publicly accessible areas have been assessed via a desktop assessment. Therefore, assumptions have been made regarding vegetation and potential habitat within the study area. Additionally, historical aerial imagery and online databases have been reviewed to help form this assessment.

The field survey and desktop assessment determined that all vegetation within the study area was likely planted, with trees appearing to be purposefully planted in locations equal distance from buildings, roads and fence lines, and all being of similar size class. Other vegetation within the study area contained garden beds of commonly planted horticulture plants for hedging or aesthetic purposes. Remaining vegetation within the study area has been assessed using historical imagery (Figure 5 – Figure 9). It is likely that this vegetation has also been planted, with the study area having been previously cleared of all vegetation, with plantings occurring sometime after 1986 (Figure 10).

1.2.1 Potential microbat roosting habitat and survey effort

The initial field survey conducted on 12 of August found no potential microbat habitat in the exterior of the buildings when observed from publicly accessible areas.

Following feedback from NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW), emergence surveys were conducted by ELA ecologists Cornelia Ersson and Haley Winch on the evening of 18 November 2025. Access was granted into the study area along shared driveways and pathways. Inspections of the exterior of the buildings was undertaken prior to emergence surveys to identify whether any entry and/or exit points into buildings which may provide habitat for microbats was present. The field survey identified multiple openings on the buildings within the study area (Figure 10, Figure 13 and Figure 14). These were medium sized openings (approximately 20 cm wide) in the

awnings of some buildings that likely lead into the roof cavities, and small openings (approximately 5 cm in diameter) on the exterior brick walls which may lead into internal wall cavities. These openings could be used by threatened microbats to gain access and utilise this space as roosting habitat. There is potential for additional openings to be present on parts of the buildings that were unable to be assessed within the study area. The existing two- and three-storey brick walk-up dwellings contain tiled roofs and eave voids that could create dark, sheltered microclimates suitable for small roosting groups of insectivorous microbats. Additionally, access to the internal areas of the dwellings remains restricted; therefore, internal inspections of roof cavities could not be undertaken at the time of the field survey. External visual assessments of both openings did not identify signs of microbat activity (such as staining, guano, or calls) at the time of the field survey.

Two optimal locations for emergence surveys based on potential habitat recorded and flight paths were selected (Figure 10). Following this, both ecologists took position approximately 30 minutes prior to sunset. Survey involved listening using handheld ultrasonic detectors with microphones aimed at potential bat habitat within the study area. Spotlights were carried to be used after sunset to allow continual visual surveillance on potential habitat within the study area. Surveys concluded one hour after sunset. No microbats were visually or audibly detected during the emergence surveys.

A likelihood of occurrence assessment was also undertaken to determine the potential of threatened microbat species utilising the study area as habitat (Appendix A). The assessment concluded that given the location of the project, the low number of records of threatened microbat species with 5 km of the study area, and the limited amount of remnant native vegetation or preferred habitat for these species, it is unlikely that threatened microbat species would actively utilise the buildings for roosting or breeding habitat.

1.3 Conclusion

Subject to the literature and database review, field survey results, and implementation of above mitigation measures, it is concluded that the proposal is unlikely to have significant impacts to biodiversity values. No threatened microbats were identified during the field surveys. Therefore, the proposed project is unlikely to have potential prescribed impacts to a threatened species.

The following mitigation measures are recommended:

- Pre-clearance surveys of vegetation to determine whether any fauna habitat is present. If fauna habitat is identified, trees should be clearly marked, and all other vegetation should be cleared prior. An ecologist or similarly qualified personnel should be present during clearance works of vegetation containing identified fauna habitat.
- Incorporate locally indigenous flowering species into the landscaping and garden designs to support local biodiversity.
- Erosion and sediment controls be implemented during the construction phase to prevent runoff affecting any water bodies within the nearby area.

Following the implementation of the above mitigation measures, the remaining impacts to biodiversity are considered to be minimal and appropriate for approval.

2. Biodiversity Development Assessment Report Waiver Request

2.1 Relevant Secretary's Environmental Assessment Requirements

This BDAR waiver request addresses the relevant Secretary's Environmental Assessment Requirements (SEARs) assumed to be issued for the SSDA as provided in the Industry-Specific SEARs (Housing) set out in Table 1 below, being SEARs issue 16.

Table 1 Secretary's Environmental Assessment Requirements relevant to this Report

Relevant SEARs Key Issue	Location in Report
Section 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 <i>Biodiversity Conservation Act 2016</i> and the <i>Biodiversity Assessment Method 2020</i> - OR - If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	ELA has prepared a BDAR waiver to address Section 16 of the Industry Specific SEARs. The Waiver is found in Table 2 of this report.

2.2 Study area location and context

The development information requirements for a BDAR waiver request, in accordance with Attachment A of the BDAR report waiver guidelines (DPIE 2019), are addressed in Table 2. Table 3 provides information regarding the impacts of the proposed development on biodiversity values in accordance with Attachment B of the guidelines (DPIE 2019).

Table 2: BDAR waiver request information requirements

Requirement	Information
Administration	Project ID: not yet available Project name: Homes NSW BDAR Waiver Hillsdale Proponent: Homes NSW Completed by: Hamish Pritchard – Ecologist, B. Conservation Biology Cornelia Ersson – Graduate Ecologist (ELA) – B.Sc. (Environmental Science) (Biology) Reviewed by: Alex Gorey – Associate Ecologist and BAM Accredited Assessor BAAS #22003, B. Environmental Science and Geography, M. Sc Sustainability
Study Area Details	Street Address 68-80 Beauchamp Road Hillsdale 2036 (i.e. the study area) Lot and DP The study area is located across the following Lot / DP: 12/-/DP736905 Local Government Area (LGA) Bayside Council The study area is currently zoned as R3 Medium Density Residential under the <i>Bayside Local Environmental Plan 2021</i> (Bayside LEP). The objectives of R3 zoning are as follows: - To provide for the housing needs of the community within a medium density residential environment. - To provide a variety of housing types within a medium density residential environment.

Requirement	Information
	c. <i>To enable other land uses that provide facilities or services to meet the day to day needs of residents.</i> d. <i>To ensure land uses are carried out in a context and setting to minimise impact on the character and amenity of the area.</i> e. <i>To enable residential development in accessible locations to maximise public transport patronage and encourage walking and cycling.</i>
	Existing Study area The study area is currently occupied by multiple 1980's two-storey brick and lightweight buildings and is constrained by a stormwater culvert, which diagonally bisects the study area. North of the study area is Rhodes Street Reserve and three 6-7 storey residential apartment buildings. Matraville Public School is located to the east. Surrounding the study area is a mix of housing types with predominantly 3-storey walk-ups on Flack Avenue and lower density single dwellings within the Randwick LGA R2 Low Density Residential zone to the south. The study area is within 500m of the Matraville local centre on Bunnderong Road and approximately 1.7km south of Westfield Eastgardens. Heffron Park is less than 500m north-east of the study area and Grace Campbell Reserve is within 750m. Location Map: An aerial location map is presented in Figure 1. Biodiversity A field survey was conducted on 12 August 2025 by ELA ecologists Hamish Pritchard and Kacey Tada. However, survey could only be undertaken from publicly accessible areas and therefore not all of the study area was surveyed. To supplement this, a desktop assessment has been undertaken to assess biodiversity values in the study area and assumptions have been made. The study area is not mapped under the Biodiversity Values Map (accessed May 2025) (NSW DCCEEW 2025b) (Figure 3). There are no native plant community types (PCTs) previously mapped within the study area (NSW DCCEEW 2025a) (Figure 10) Figure 4). The study area is in a highly residential area in Eastern Sydney with no connection to remnant bushland (Figure 3). An assessment of biodiversity values is provided in Table 3 of this report. Historical Context The earliest historical imagery accessed via the NSW Historical Imagery viewer (Spatial Services 2024) shows that in 1943 the study area was cleared of vegetation, except for a strip of trees along half of the western boundary and a few trees along a stormwater culvert, which diagonally bisects the study area (Figure 5). Imagery from 1955 show the study area occupied by numerous buildings (Figure 5). Sometime between 1955 and 1971, all remaining vegetation within the study area was removed (Figure 7). Imagery from 1986 shows the demolition of these buildings and bulk earthworks occurring across the study area (Figure 8). By 2005, the current two-storey brick and lightweight buildings had been constructed (Figure 9). Areas surrounding the study area have experience a similar level of disturbance and are predominantly comprised of residential dwellings and cleared land. Therefore, it is understood that there is no remnant vegetation present on the study area or in proximity to the study area.

Requirement	Information
Proposed Development	The proposal aims to develop two seven-eight storey residential flat buildings with basement car parking.



Figure 1 Location of the study area with proposed layout.





Figure 3: NSW DCCEEW Biodiversity Values mapped within 2 km of the study area



Figure 4: Plant Community Types (PCT) mapped in proximity to the study area (DCCEEW 2024)



Figure 5: Aerial imagery of the study area from 1943



Figure 6: Aerial imagery of the study area from 1955



Figure 7: Aerial imagery of the study area from 1971



Figure 8: Aerial imagery of the study area from 1986



Figure 9: Aerial imagery of the study area from 2005



Figure 10: Validated vegetation based on historical aerial imagery, SVTM and field survey from publicly accessible areas and potential entry/exit points into buildings for microbats.

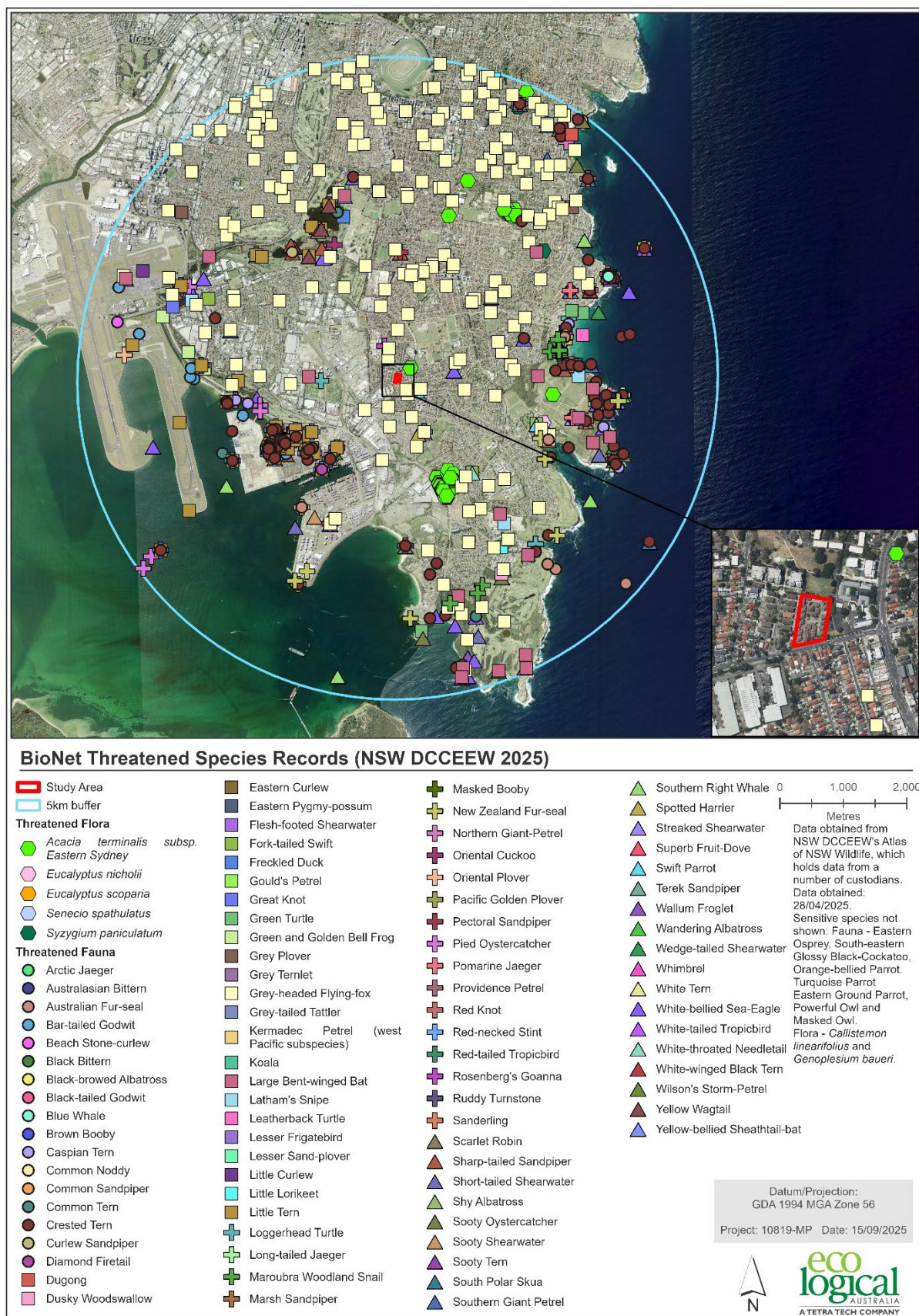


Figure 11: Threatened flora and fauna BioNet records within a 5 km buffer of the study area (NSW DCCEEW 2025c)



Figure 12: Threatened microbat species BioNet records within a 5 km buffer of the study area (NSW DCCEEW 2025c)



Figure 13: Example of potential entry/exit point into exterior brick wall cavity observed on one building, which may provide access to roosting habitat for microbats.



Figure 14: Potential entry/exit point into roof cavities observed on another building, which may provide access to roosting habitat for microbats.

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

Biodiversity Value		Meaning	Relevant? (✓ or N/A)	Discussion of values within the site
<i>Biodiversity Conservation Act (Clause 1.5 (2))</i>				
Vegetation Integrity 1.5(2)(a)		Degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near-natural state.	N/A	A review of historical imagery of the study area shows that the study has undergone significant development on multiple occasions which have resulted in the total removal of vegetation on the study area. While vegetation is present within the existing context of the study area, it is likely all vegetation has been planted since 1986 based on historical imagery (Figure 8). Due to previous and current development of the study area, vegetation and soils have been highly modified, disturbed or removed (Figure 5 – Figure 9). Vegetation surveyed within the study area was identified as planted native and exotic, with remaining vegetation unable to be assessed during the field survey assumed to consist of planted native and exotic vegetation following the literature and database review (Figure 10). No remnant native vegetation or previously mapped PCTs is likely to occur within the study area. The exotic and planted native vegetation present within the study area is likely to have been planted given the highly modified environment (Figure 5 – Figure 9). Any presence of regenerating native vegetation within the study area is highly unlikely given that the study area is disconnected from other patches of intact native vegetation (Figure 4), and has been subjected to intensive development, disturbance, and soil modification over roughly 40 years. As such, the development would not compromise vegetation integrity as no remnant vegetation or regenerating native vegetation will be affected.
Habitat Suitability 1.5(2)(b)		Degree to which the habitat needs of threatened species are present at a particular site	✓	No threatened flora or fauna species, including microbats, have previously been recorded within the study area (NSW DCCEE 2025c) (Figure 11). Threatened flora is unlikely to occur within or adjacent to the study area given the historical land clearing and current urban land use. Planted native and exotic vegetation within and immediately adjacent to the study area have a limited potential to provide marginal habitat for highly mobile fauna species. Species would only utilise this vegetation on occasion to shelter and forage opportunistically. There is some foraging habitat present for threatened <i>Pteropus poliocephalus</i> (grey-headed flying-fox), which have been recorded frequently within 5 km of the study area (Figure 11). This vegetation is unlikely to be heavily relied upon by these species given similar foraging resources are scattered throughout the surrounding area and the species is highly mobile. Additionally, microbats would likely utilise the study area as foraging habitat, although would only form part of a much wider area in which individuals would forage. If vegetation is to be removed within the study area, offset planting of locally indigenous flowering plants would help to mitigate the loss of potential foraging habitat. Of the buildings assessed within the study area, multiple entry/exit points were observed which could be utilised by threatened microbat species. Emergence surveys were conducted and did not record any microbats occurring within the study area (Figure 10). It is considered unlikely that threatened microbats are utilising buildings within the study area.

Biodiversity Value	Meaning	Relevant? (✓ or N/A)	Discussion of values within the site
Biodiversity Conservation Regulation 2017 (Clause 1.4)			
Threatened Abundance 1.4(a)	Species Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	✓	The existing buildings have been identified to contain potential roosting habitat for threatened species such as microbats, with four areas identified within the study area on three of the existing buildings. The buildings are currently occupied by people and there is likely a high level of disturbance. Additionally, <i>Acridotheres tristis</i> (common myna) was present in high abundance during the field survey and was observed flying in and out of one of the cavities located in the awning of a building. It is likely that common myna would be utilising this potential roosting habitat as well and may potentially compete with microbats for the habitat. Emergence surveys did not identify any microbats occurring within the study area and it is considered unlikely threatened microbats are utilising buildings as habitat. There are no threatened ecological communities (TECs) likely to be present within the study area. The study area is assumed to contain exotic and planted native vegetation (Figure 10). The study area is currently developed with no PCTs recorded in previous mapping (NSW DCCEEW 2025a) (Figure 4). There are no BioNet (NSW Atlas of Wildlife) records of threatened flora within the study area (Figure 11) (NSW DCCEEW 2025c). The study area lacks remnant native vegetation, resulting from a history of disturbance, development and modification of the soil profile (Figure 8). It is therefore highly unlikely that threatened flora would occur within or near the study area given no suitable habitat is available due to the urban context and historical disturbance. The nearest threatened species records are for <i>Pteropus poliocephalus</i> (grey-headed flying-fox), with numerous records within 5 km of the study area. However, it is noted that this is a highly mobile species which relies on large flowering and fruiting trees for foraging and roosting. Marginal habitat is present within the study area and it is likely the species forages on this habitat from time to time. Similar quality foraging and roosting habitat exists within the wider area (5 km) and would supplement removal of potential habitat from the study area. The following two threatened microbat species have been recorded within a 5 km radius of the study area (Figure 12): • <i>Miniopterus orianae oceanensis</i> (large bent-winged bat) • <i>Saccolaimus flaviventris</i> (yellow-bellied sheath-tail bat). The likelihood of threatened microbats occurring and roosting within the study area is discussed within Appendix A.
Vegetation abundance - 1.4(b)	Occurrence and abundance of vegetation at a particular site	✓	The study area is predominantly comprised of buildings, other hardstand surfaces, lawn and landscaped garden beds, with planted mature vegetation found in residential gardens and yards (Figure 10). The entirety of vegetation within the study area has been assessed following field survey and background review of relevant literature and databases as containing planted vegetation, having been completely cleared of vegetation by 1971 (Figure 7). There are no previously or currently mapped PCTs or TECs (NSW DCCEEW 2025a) present within the study area (Figure 4). A review of historical aerial imagery of the study area shows that there has been significant redevelopment, with no vegetation continuously present since sometime post-1955 (Figure 6). Furthermore, the study area is located within a highly urbanised and fragmented environment, and is not mapped as containing any mapped high biodiversity values

Biodiversity Value		Meaning	Relevant? (✓ or N/A)	Discussion of values within the site
				(NSW DCCEEW 2025b, accessed May 2025), as seen in Figure 3. The study area is disconnected from patches of mapped native vegetation within the surrounding area, with the closest patches being PCT3545 (Coastal Sands Bloodwood Low Forest) located approximately 1 km south of the study area, and PCT3806 (Sydney Coastal Sand Mantle Heath) located approximately 1km South-west of the study area (Figure 4). Field survey confirmed all vegetation occurring along Beauchamp Road as being planted native. This was determined due to the placement within the study area, with all trees being similarly distanced from the fence line, buildings and internal driveways, and all trees being of similar age class. Remaining vegetation within the study area included commonly planted horticultural species used for hedging and aesthetic purposes. There are no BioNet (NSW Atlas of Wildlife) records of threatened flora species recorded within the study area (Figure 11, NSW DCCEEW 2025c). Threatened flora would be very unlikely to occur within or near the study area given little to no suitable habitat is available due to the urban context of the study area. Given the lack of threatened flora species or PCTs within or in proximity to the study area, changes to vegetation abundance is highly unlikely to be significant.
Habitat Connectivity 1.4(c)		Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	N/A	Vegetation within the study area is assumed to be limited to planted native and exotic vegetation which does not form part of a PCT and is located within a highly fragmented and developed urban area in Hillsdale, NSW. The study area does not significantly contribute to habitat connectivity across the local landscape and is mainly surrounded by roads, built structures including multi-storey buildings, is in close proximity to the Sydney Airport and is not connected to areas of intact native vegetation. As such, the study area provides limited connectivity to facilitate the movement of threatened species across their range. Replacement plantings of any native vegetation removed will help to mitigate the limited degree of habitat fragmentation that will occur because of the development.
Threatened Species Movement 1.4(d)		Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	✓	Vegetation within the study area does not contain habitat that is critical to maintaining the life cycle of threatened species, excluding grey-headed flying-fox as any foraging habitat is considered critical habitat to their survival. Given the context of the study area and the presence of more intact and expansive vegetation around the study area, the removal of vegetation within the study area is not considered to cause a significant impact on grey-headed flying-fox to the extent that their life cycle would be affected. Movement for less mobile threatened fauna, such as mammals (excluding bats) across the study area is highly unlikely due to roads, dense array of buildings and lack of connective vegetation within the landscape. There are some limited opportunities for movement around the study area for more mobile threatened fauna including birds and bats due to the presence of mature canopy trees within the study area, as well as to the north of the study area. However, this limited extent of planted native and exotic vegetation is a very small component of a larger matrix of urban vegetation and is unlikely to be heavily relied upon by any threatened species.

Biodiversity Value	Meaning	Relevant? (✓ or N/A)	Discussion of values within the site
			Removal of the buildings and construction of new buildings is unlikely to increase vehicle strikes or limit the movement of microbats, and other highly mobile threatened species such as birds or grey-headed flying-fox given the proposed building will occur in an area which already contains buildings.
Flight Path Integrity 1.4(e)	Degree to which the flight paths of protected animals over a particular site are free from interference	N/A	The proposed development is within an existing built environment of Hillsdale, which contain various sized buildings and residential dwellings. Protected animals are unlikely to rely on the limited extent of vegetation identified within the study area, along their flight path. Two threatened microbat species have been recorded within a 5 km radius of the study area, and grey-headed flying-fox have been recorded within proximity (approximately 200 m) of the study area (Figure 11 and Figure 12). These species are highly mobile and are likely to move throughout the locality in multiple directions, and are unlikely to solely rely on a flight path over the land where the residential building is proposed. The proposal is unlikely to affect flight paths nearby, considering existing buildings adjacent to the study area and available habitat in the greater surrounding landscape.
Water Sustainability 1.4(f)	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site	N/A	The study area is highly disturbed. There are no natural watercourses or other water bodies present within the study area. No hydrological processes exist within the study area itself that would support threatened species or ecological communities. It is recommended that erosion and sediment controls be implemented during the construction phase to prevent runoff affecting any water bodies within the nearby area.

References

- Atlas of Living Australia (ALA) 2025. Atlas of Living: Explore Your Area. Available: <https://biocache.ala.org.au/explore/your-area#-34.0083|151.1065|12|Mammals>. (Accessed June 2025)
- Churchill, S. 2008. *Australian Bats*. Second edition. Published by Allen & Unwin.
- Department of Planning, Industry and Environment (DPIE) 2019. *How to apply for a biodiversity development assessment report waiver for a Major Project Application*. NSW Government. Environment, Energy and Science. (Accessed April 2025). Available: <https://nswdpe.intersearch.com.au/nswdpejspui/bitstream/1/12463/1/apply-biodiversity-development-assessment-report-waiver-190593.pdf>
- Department of Climate Change, Energy, the Environment, and Water (NSW DCCEEW) 2025a. NSW State Vegetation Type Map (STVM). Available: <https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/nsw-bionet/state-vegetation-type-map>. (Accessed April 2025)
- Department of Climate Change, Energy, the Environment, and Water (NSW DCCEEW) 2025b. Biodiversity Values Map and Threshold Tool (online). Available: <https://www.lmbc.nsw.gov.au/Maps/index.html?viewer=BOSETMap>. (Accessed April 2025)
- Department of Climate Change, Energy, the Environment, and Water (NSW DCCEEW) 2025c. NSW BioNet: NSW Atlas of Wildlife online search tool. Available: <http://www.bionet.nsw.gov.au/>. (April 2025)
- NSW Department of Climate Change, Energy, the Environment, and Water (NSW DCCEEW) 2025d. NSW Threatened Species Profile Database. Available: <https://threatenedspecies.bionet.nsw.gov.au/>
- NSW Spatial Services, 2025. Historical Image Viewer – 29 Florida Street, Sylvania. imagery from 1943-2005. (Accessed April 2025) Available: <https://portal.spatial.nsw.gov.au/portal/apps/webappviewer/index.html?id=f7c215b873864d44bccdda8075238cb>

Appendix A Threatened Microbat Habitat Associations

Two threatened microbat species have previously been recorded within 5 km of the study area (Figure 10). No threatened microbat species have previously been recorded within the study area. Whilst there are previous records of both species utilising man-made structures (including buildings) for roosting, intact and partially occupied urban buildings (such as that present in the study area) are not considered core roosting habitat or breeding habitat, for either of these species (Churchill 2008 and NSW DCCEW 2025d).

A likelihood of occurrence assessment was conducted for the microbat species previously recorded within 5 km of the study area in Table 4.

Table 4: Likelihood of occurrence of threatened microbat species previously recorded within 5 km of the study area

Species name	Common Name	Records in 5 km	Habitat associations	Likely to occur within the study area
<i>Saccolaimus flaviventris</i>	yellow-bellied sheath-tail-bat	1	Hunts above the canopy in forested areas, but in mallee or open country it comes lower to the ground. This species primarily roosts in tree hollows and has been found in abandoned nets of sugar gliders. Occasionally found resting on the walls of buildings in broad daylight. It is usually a solitary species but occasionally occurring in colonies of fewer than 10 individuals. Large maternity colonies may exceed 100 individuals	Unlikely to occur – based on the number of local records and proximity of the closest records to the study area. There is only 1 local record for this species 3 km north-west of the study area associated with The Lakes Golf Club. There is some existing planted native vegetation present in the study area such as <i>Eucalyptus crebra</i> that could encourage this species to travel into the locality. However, more suitable habitat exists in the surrounding area. Unlikely to be roosting – Local records predominantly occur in more densely vegetated areas. Vegetation within and adjacent to the study area is minimally forested and offers limited potential habitat for the species which prefer tree hollows. The study area does not contain any hollows for roosting. Although this species has been observed roosting on buildings, this is only on the rare occasion when individuals have been sick or exhausted. Additionally, emergence surveys did not identify any microbat species occurring within the study area.
<i>Miniopterus orianae oceanensis</i>	large bent-winged bat	22	Hunts in forested areas above the canopy. This species primarily roosts in caves, but is known to use derelict mines, stormwater drains, buildings and other human made structures. There are just a few	Unlikely to occur – based on the number of local records and proximity of the closest records to the study area. There are 22 local records for this species with the closest record approximately 1.5 km west of the

Species name	Common Name	Records in 5 km	Habitat associations	Likely to occur within the study area
			known maternity roosts throughout this species' range. Caves are the primary habitat for maternity roosts and breeding or roosting colonies can contain from 100-150,000 individuals	study area associated with some vegetation in an industrial area. Unlikely to be roosting – Local records predominantly occur in more densely vegetated areas. Vegetation within and adjacent to the study area is limited and is therefore not preferential for this species. This species is known to roost in human made structures such as derelict mines, stormwater drains and buildings and therefore has the potential to be roosting within structures in the study area. While this species is known to roost in buildings, it is considered unlikely to be roosting within the study area due to a lack of suitable surrounding habitat, specifically the presence of any caves, mines or derelict drains. Additionally, emergence surveys did not identify any microbat species occurring within the study area.