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16 June 2025

Our ref: 25SYD-11158

Legpro 45 Pty Ltd ATF Legpro 45 Unit Trust c/o Legacy Property
Level 45, 25 Martin Place
Sydney NSW 2000

Attention: Peter Navratil

Dear Peter,

RE: 253-265 Pacific Highway, North Sydney Biodiversity Development Assessment Report Waiver Request (SSD-84416958)

Eco Logical Australia Pty Ltd (ELA) was engaged by Legacy Property on behalf of Legpro 45 Pty Ltd to provide a biodiversity development assessment report waiver (BDAR Waiver) to accompany a detailed design State Significant Development Application (SSDA) for the proposed mixed-use development at 253-265 Pacific Highway, North Sydney (the 'subject site', as shown in Figure 1).

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-84416958) (Table 2). State Significant Development (SSD) is regulated under the *Environmental Planning and Assessment Act 1979* (EP&A Act). The EP&A Act requires proponents to apply to the Minister of Planning for development consent of SSD, supported by an Environmental Impact Statement (EIS). These applications are also subject to biodiversity assessment requirements under the *Biodiversity Conservation Act 2016* (BC Act). Clause 7.9 of the BC Act requires that an SSD application is 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 letter assesses potential impacts to biodiversity as a result of the SSD, in accordance with the NSW Department of Planning & Environment's *How to apply for a biodiversity development assessment report waiver for a major project application document* (DPIE 2019). Information to support the application is outlined in Table 4 and Table 5 below.

The assessment includes a literature and database review of relevant information concerning potential impacts to biodiversity values as a result of the proposed SSDA. The following database reviews were undertaken:

- BioNet threatened flora and fauna records 5km radius (NSW DCCEEW 2024a)
- Biodiversity Values Mapping (NSW DCCEEW 2024b)
- State Type Vegetation Mapping (STVM) (DPE 2023).

A site inspection was undertaken by an ELA ecologist on 6 June 2025 to identify biodiversity values within the subject site. Vegetation within subject site consisted of predominantly exotic species which were confined to a concrete planter box, with some exotic species also growing along the buildings. Two exotic street street trees were also present. No remnant vegetation or vegetation which corresponds to a plant community type (PCT) was recorded within the subject site. Vegetation within the subject site is not connected to patches of intact native vegetation or part of important flight paths for migratory species.

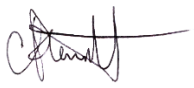
It is known that some threatened microchiropteran bats (microbat) including, but not limited to, *Miniopterus australis* (little bent-winged bat), *Miniopterus orianae oceanensis* (large bent-winged bat) and *Myotis macropus* (southern myotis) will roost in humanmade structures, including buildings. Overall, buildings were in a reasonable condition. However, multiple openings into potential roosting spaces were observed during the field survey. External grate leading to a dark, underground space was identified at 253 Pacific Highway, with external openings into roof cavities and awnings also identified at 255-259, 261-263 and 265 Pacific Highway. A dilapidated shed behind building 265 Pacific Highway was also identified as potential habitat for microbats.

During the site inspection, a daytime microbat roost search was undertaken using a handheld torch and an ultrasonic detector (Anabat Swift). The survey was limited to reasonably accessible areas. As a result, not all roof cavities or buildings were surveyed entirely. No signs of microbat habitation such as scat, staining or fly casings were identified. No calls were detected during the survey.

It is considered unlikely that threatened microbats are using buildings within the subject site as roosting habitat. However, ELA notes that the roost search was undertaken during winter and during the day when microbat activity and detectability are diminished, with not all areas of potential habitat surveyed in their entirety. As a precautionary measure, the proposed development should include an unexpected finds protocol to facilitate reassessment should any potential or suspected threatened fauna, including microbats, be encountered during works. It is also recommended that ultrasonic surveys are undertaken prior to demolition to confirm buildings have not since become inhabited by microbats.

This SSD is considered highly unlikely to have a significant impact on biodiversity values or threatened species listed under the BC Act. No Matters of National Environmental Significance (MNES) listed under the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) have been identified within the subject site. The development is suitable and warrants approval, subject to implementation of the mitigation measures outlined above and in Section 2.6 of this report.

Regards,



Claire Plunkett
Ecologist

1. Executive summary

This Biodiversity Development Assessment Report Waiver (BDAR Waiver) has been prepared by Eco Logical Australia (ELA) to accompany a detailed State Significant Development Application (SSDA) for the mixed-use development at 253-265 Pacific Highway, North Sydney. The subject site is made up of four lots. The legal description of the subject site is outlined in Table 1.

Table 1: Legal description

Property Address	Title Description
253 Pacific Highway	SP16134
255-259 Pacific Highway	SP22870
261-263 Pacific Highway	Lot 51/DP714323
265 Pacific Highway	Lot B/DP321904
Total site area	**1,099 m^2**

The SSDA (SSD – 84416958) seeks approval for:

- the demolition of existing buildings at 253-265 Pacific Highway, and the retention and reuse of the existing local heritage item building at 265 Pacific Highway;
- the construction of a part 10, part 13 storey, mixed use, shop top housing development including: a 2 storey podium consisting of ground and first storey commercial tenancies, ground level communal open space and deep soil landscaping at 265 Pacific Highway;
- a tower above consisting of 35 residential apartments and communal roof garden;
- excavation of four levels of basement level car parking and servicing; and the stratum and strata subdivision of the building.

As part of the proposed residential component, 10 affordable housing apartments are proposed to be provided under Chapter 2 – Infill Affordable Housing under the State Environmental Planning Policy (Housing) 2021 (Housing SEPP).

The Secretary's Environmental Assessment Requirements (SEARs) for the proposal were issued on 29 May 2025 (SSD-84416958). This report addresses Item 16. Biodiversity of the SEARs.

A site inspection was undertaken to assess the biodiversity values of the subject site. No remnant native vegetation was identified occurring within the subject site. During the site inspection, a visual assessment of external building features was conducted as well as assessment of accessible parts of internal building areas, including basements, the dilapidated shed and any crevices observed. A handheld torch was used to sight any microbats or signs of microbat roosting, such as staining, scat or bat fly casings. An Anabat Swift ultrasonic detector with omnidirectional microphone was used to listen for any microbat activity, including social chatter calls if present. No threatened entities or significant habitat were identified within the subject site during inspection, and no threatened entities are considered likely to occur within the subject site.

This report concludes following the implementation of mitigation measures, that the impacts to biodiversity are likely to be marginal and is not likely to have any significant impact on biodiversity values.

The following mitigation measures are proposed to be adopted for the SSD:

- an Unexpected Finds Protocol for threatened fauna is to be is to be established and included as a condition of consent.

- incorporate locally indigenous flowering species into the landscaping and garden designs to support local biodiversity.
- pre-clearance building inspection of roof cavities etc., is undertaken immediately prior to demolition to confirm buildings have not become inhabited by microbats or other fauna since the time that this BDAR Waiver was prepared.

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

2. Background

2.1. Introduction

The SSDA (SSD – 84416958) seeks approval for:

- the demolition of existing buildings at 253-265 Pacific Highway, and the retention and reuse of the existing local heritage item building at 265 Pacific Highway;
- the construction of a part 10, part 13 storey, mixed use, shop top housing development including: a 2 storey podium consisting of ground and first storey commercial tenancies, ground level communal open space and deep soil landscaping at 265 Pacific Highway;
- a tower above consisting of 35 residential apartments and communal roof garden;
- excavation of four levels of basement level car parking and servicing; and the stratum and strata subdivision of the building.

As part of the proposed residential component, 10 affordable housing apartments are proposed to be provided under Chapter 2 – Infill Affordable Housing under the State Environmental Planning Policy (Housing) 2021 (Housing SEPP).

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs). The SEARs for the proposal were issued on 29 May 2025 (SSD-84416958). Specifically, this report addresses Item 16. Biodiversity of the SEARs requirements (Table 2).

Architectural drawings (nettletontribe 2025) are provided in Appendix B.

Table 2: SEARs Requirements

Item	Requirement	Documentation required
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. 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.	Biodiversity Development Assessment Report or BDAR Waiver (*this report*)

2.2. The site

The site is located at 253-265 Pacific Highway, North Sydney, within the North Sydney local government area (LGA). The site is made up of the following lots outlined in Table 3.

Table 3: Address and Lots associated with the site

Lot	Address	Site Area
SP16134	253 Pacific Highway	147m^2
SP22870	255-259 Pacific Highway	553m^2
Lot 51/DP714323	261-263 Pacific Highway	294m^2
Lot B/DP321904	265 Pacific Highway	105m^2

The site has a primary frontage of approximately 46.93 m to the Pacific Highway and a secondary frontage of approximately 46.87 m to Church Lane. The site has an approximate area of 1,099 m^2.

The site is surrounded by residential buildings and North Syndey public school to the west. The urban context surrounding the site is characterised by a mix of commercial, retail, residential and recreational land uses. The site is approximately 750 m north of North Sydney train station and 260 m from Victoria Cross metro station.

The site is currently occupied by four 2- and 3-storey commercial and retail buildings.

Figure 1: Location of subject site

Figure 2: Subject site located at 253-265 Pacific Highway, North Sydney

2.3. Methodology

A site inspection was undertaken on 6 June 2025 by ELA ecologist Claire Plunkett over one day to assess the biodiversity values of the subject site. The subject site was traversed to identify potential habitat for fauna and identify vegetation within and adjacent to the site. During the site inspection a visual assessment of external building features was conducted. The survey also included an assessment of accessible parts of internal building areas, including basements, the dilapidated shed and any crevices observed. A handheld torch was used to sight any microbats or signs of microbat roosting, such as staining, scat or bat fly casings. An Anabat Swift ultrasonic detector with omnidirectional microphone was used to listen for any microbat activity, including social chatter calls if present.

2.4. Assessment and findings

No threatened entities or significant habitat were identified within the subject site during inspection. No threatened entities are considered likely to occur within the subject site.

2.5. Cumulative impacts

Due to a lack of biodiversity values, cumulative impacts are not considered likely to occur for this development.

2.6. Mitigation measures

An Unexpected Finds Protocol for threatened fauna is recommended to be established and should form part of the conditions of consent. This is to include a 'stop works' procedure to be executed if any potential or suspected threatened fauna are identified during work, including but not limited to microbat species. In the event of an unexpected, threatened fauna find, the project ecologist should be consulted prior to re-commencing work.

The proposed development will retain the two street trees as well as include landscaping for the ground level and a rooftop garden. It is recommended that locally indigenous flowering species be incorporated into the garden designs to supplement the loss of native species from the mixed native/exotic planter box (Figure 3).

It is recommended that a pre-clearance inspection, including ultrasonic microbat emergence surveys, is undertaken by a qualified fauna ecologist immediately prior to building demolition.

2.7. Conclusion

This report concludes following the implementation of mitigation measures, that the proposal is unlikely to have significant impacts to biodiversity values.

The following mitigation measures are proposed to be adopted for the SSD:

- an Unexpected Finds Protocol for threatened fauna is to be established and included as a condition of consent.
- Incorporate locally indigenous flowering species into the landscaping and garden designs to support local biodiversity.
- Pre-clearance building inspection of roof cavities, etc. is undertaken immediately prior to demolition to confirm buildings have not become inhabited by microbats or other fauna since the time that this BDAR Waiver was prepared.

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

3. BDAR Waiver Request

Table 4: BDAR Waiver request information requirements

Requirement	Information
Administration	**Proponent**: Legpro 45 Pty Ltd ATF Legpro 45 Unit Trust c/o Legacy Property, Level 45, 25 Martin Place, Sydney NSW 2000 **Project ID**: SSD-84416958 **Completed by**: Claire Plunkett – Ecologist (ELA), MSc (Conservation Biology), BNatSc (Animal Science - Zoology); Hamish Pritchard – Ecologist (ELA), B Conservation Biology (Hons.) **Reviewed by**: Stacey Wilson – Associate Ecologist (ELA), MSc (Environmental Science), BSc (Biodiversity and Conservation) Accredited BAM Assessor (BAAS22030)
Site Details	**Street Address:** 253-265 Pacific Highway, North Sydney, NSW **Lot and DP Number:** • SP16134 • SP22870 • Lot 51/DP714323 • Lot B/DP321904 **Local Government Area (LGA):** North Sydney **Land use zoning:** The subject site is zoned as MU1 (Mixed Use) under the *North Sydney Local Environmental Plan 2013* (North Sydney LEP). **Existing Environment** The subject site is approximately 0.10 ha in size and contains three commercial buildings and one mixed use commercial/residential building. The subject site occurs in an urban environment comprising commercial, retail, residential and recreational land uses. A site inspection was completed by ELA Ecologist Claire Plunkett on 6 June 2025 to identify potential biodiversity values. Vegetation was primarily limited to one concrete planter box containing mixed planted native and exotic vegetation, and two exotic street trees (Figure 3). The subject site predominately comprises built form and hardstand with a very small amount of native and exotic vegetation containing high threat weed species. All buildings were identified as containing potential microbat roost habitat, however, considered unlikely due to location and conditions of the habitat. A location map showing the subject site is presented in Figure 1.
Proposed Development	The development is to be assessed as SSD. The proponent seeks development consent for: • Demolition of the existing structures at 253-265 Pacific Highway, and retention and reuse of existing local heritage building at 265 Pacific Highway. • Construction of a mixed use commercial and residential including ground and first storey commercial tenancies, ground level communal open space, and tower of 35 residential apartments and communal roof garden. • Excavation of four levels of basement level car parking. • Stratum and strata subdivision of the building.
Impacts on biodiversity values	The subject site is not mapped under the NSW Government Biodiversity Values (BV) Map (accessed 6 June 2025) (NSW DCCEEW 2024a) (Figure 4). Further assessment provided in Table 5.

Table 5: Impacts of the proposed development on biodiversity values

Biodiversity Value	Meaning	Relevant? (✓ or N/A)	Discussion of values within the subject site
Vegetation Abundance **1.4(b) BC Regulation**	Occurrence and abundance of vegetation at a particular site.	N/A	The subject site is primarily composed of buildings and hardstand. There is minimal vegetation within the subject site, of which it is of very low abundance and biodiversity quality. One concrete planter box containing mixed planted native and exotic vegetation. This included native *Dianella caerulea* (blue flax-lily) and exotic species *Ehrharta erecta* (panic veldtgrass), *Chlorophytum comosum* (spider plant), *Parietaria judaica* (asthma weed), *Erigeron karvinskianus* (Mexican daisy) and *Crassula ovata* (jade plant). Additionally, a small amount of vegetation growing from the building awnings and along the building was also observed and included *Asplenium* sp., *Campsis radicans* (trumpet vine) and *Nephrolepis cordifolia* (fishbone fern). Two exotic trees, *Platanus occidentalis* (American sycamore), were also observed along the Pacific Highway and are proposed to be retained. See Figure 3 for the location of validated vegetation.
Vegetation Integrity 1.5(2)(a) BC Act	The 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	No native Plant Community Types (PCTs) have been previously mapped within the subject site in accordance with the State Vegetation Type Mapping (SVTM) (NSW DCCEEW 2024), shown in Figure 4. Due to previous development of the subject site, vegetation and soils have been highly modified, disturbed, or removed and exist as hard surface and developed land. Vegetation within and adjacent to the subject site is of very low structural, compositional, and therefore functional, integrity. As discussed above, it comprises planted native and exotic species which are confined to a concrete planter or have been planted as street trees. These areas of vegetation are isolated from one another with limited connectivity to planted native and exotic vegetation in adjacent properties. *Dianella caerulea* was the only native flora species identified within the subject site. This is a popular cultivated and landscaping species for urban areas. The following exotic species were also identified within and adjacent to the subject site: • *Campsis radicans* • *Chlorophytum comosum*[1] • *Crassula ovata* • *Ehrharta erecta*[1] • *Erigeron karvinskianus* • *Parietaria judaica* Planted native and exotic vegetation within and adjacent to the subject site is displayed in Figure 5 - Figure 7. There is no proposed removal of exotic street trees adjacent to buildings on Pacific Highway.

[1] denotes high threat weed species according to the Biodiversity Assessment Method 2020

Biodiversity Value	Meaning	Relevant? (✓ or N/A)	Discussion of values within the subject site
Habitat Suitability 1.5(2)(b) BC Act	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 subject site (DPE 2024) (Figure 8 - Figure 10). Threatened flora is unlikely to occur within or adjacent to the subject site given the historical land clearing and current urban land use. Vegetation present within the subject site is also considered unlikely to support any foraging habitat for threatened fauna. The four buildings within the subject site exhibited some signs of degradation but were in good condition overall. However, a few potential entry/exit points for microbats to utilise spaces for roosting habitat were identified during the field survey (Figure 11). A grate leading to a dark, underground space was observed at the rear of 253 Pacific Highway (Figure 12). Some openings leading into under the eaves and awnings were identified at 255-259, 261-263 and 265 Pacific Highway (Figure 13). An old, dilapidated shed located behind 265 Pacific Highway was also identified as potential microbat roosting habitat (Figure 14). A daytime search found no areas of high-potential roost habitat for microbats and no signs of microbat presence, such as scats, staining or fly casings, for areas that were accessible during the survey (Figure 15). The subject site is considered unlikely to provide suitable or relied upon habitat for threatened microbat species.
Threatened Species Abundance 1.4(a) BC Regulation	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site.	✓	Threatened species with the highest number of records within 5 km of the site include: • *Acacia terminalis* subsp. Eastern Sydney – 594 records • *Ninox strenua* (powerful owl) – 1876 records • *Pseudophryne australis* (red-crowned toadlet) – 172 records • *Pteropus poliocephalus* (grey-headed flying-fox) – 5012 records Location of the records in respect to the site are illustrated in Figure 8 and Figure 9. The site is unlikely to contain potential habitat for any of the above listed species, with limited vegetation present within or adjacent to the site. As such, the development is unlikely to impact on the local occurrence and abundance of any of these species. The following seven threatened microbat species have been recorded within a 5 km radius of the subject site (Figure 10). • *Falsistrellus tasmaniensis* (eastern false pipistrelle) 5 records • *Micronomus norfolkensis* (eastern coastal free-tailed bat) 11 records • *Miniopterus australis* (little bent-winged bat) 31 records • *Miniopterus orianae oceanensis* (large bent-winged bat) 95 records • *Myotis macropus* (southern myotis) 46 records • *Saccolaimus flaviventris* (yellow-bellied sheathtail-bat) 9 records • *Scoteanax rueppellii* (greater broad-nosed bat) 3 records The likelihood of threatened microbats occurring and roosting within the subject site is discussed within this table and Appendix A. The implementation of an Unexpected Finds Protocol for threatened fauna will help to minimise any potential impacts to threatened fauna which have the potential to occur but have not yet been identified within the subject site. It is also recommended that a pre-clearance inspection and ultrasonic microbat

Biodiversity Value	Meaning	Relevant? (✓ or N/A)	Discussion of values within the subject site
			emergence surveys of the buildings are undertaken by a qualified fauna ecologist immediately prior to demolition. The subject site is in a heavily urbanised area which already experiences substantial vehicle traffic. The proposed development is therefore unlikely to significantly increase the risk of vehicle strikes on threatened fauna.
Habitat Connectivity 1.4(c) BC Regulation	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range.	N/A	The subject site exists in an urbanised landscape with heavily disturbed and fragmented vegetation. Vegetation within the subject site does not significantly contribute to habitat connectivity within the greater landscape. Incorporating locally indigenous species into landscaping and gardens will improve habitat connectivity for local biodiversity such as birds and invertebrates.
Threatened Species Movement 1.4(d) BC Regulation	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle.	N/A	Vegetation within the subject site does not contain suitable breeding habitat or habitat that is critical to maintaining the life cycle of any threatened species. It is unlikely that the vegetation within the subject site would be relied upon by any threatened species. Potential microbat habitat was identified within the subject site. The potential habitat was identified as roof and awning cavities, underground space and a dilapidated shed (Figure 12, Figure 13 and Figure 14). Following a daytime inspection of the buildings, no high-potential roost habitat or suitable breeding habitat (e.g., caves, culverts, bridges) was identified within the buildings in areas that were accessible for the survey. Removal of the buildings and installation of a new high-rise building is unlikely to limit the movement of microbats or 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 high-rise buildings.
Flight Path Integrity 1.4(e) BC Regulation	Degree to which the flight paths of protected animals over a particular site are free from interference.	N/A	The subject site occurs in a highly urbanised environment, surrounded by high-rise buildings and roads. The general flight paths of protected animals already face some interference from high-rise buildings. Given the lack of vegetation and other natural resources within the subject site, it is unlikely that the site is used as a significant stop over point in the flight path of any threatened or migratory species. It is unlikely that the proposal would substantially change or interfere with the flight paths of these species over the subject site.
Water Sustainability 1.4(f) BC Regulation	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.	N/A	The subject site does not contain water bodies or drainage structures that contribute to hydrological processes that would sustain threatened entities.

Figure 3: Validated vegetation within and surrounding the subject site

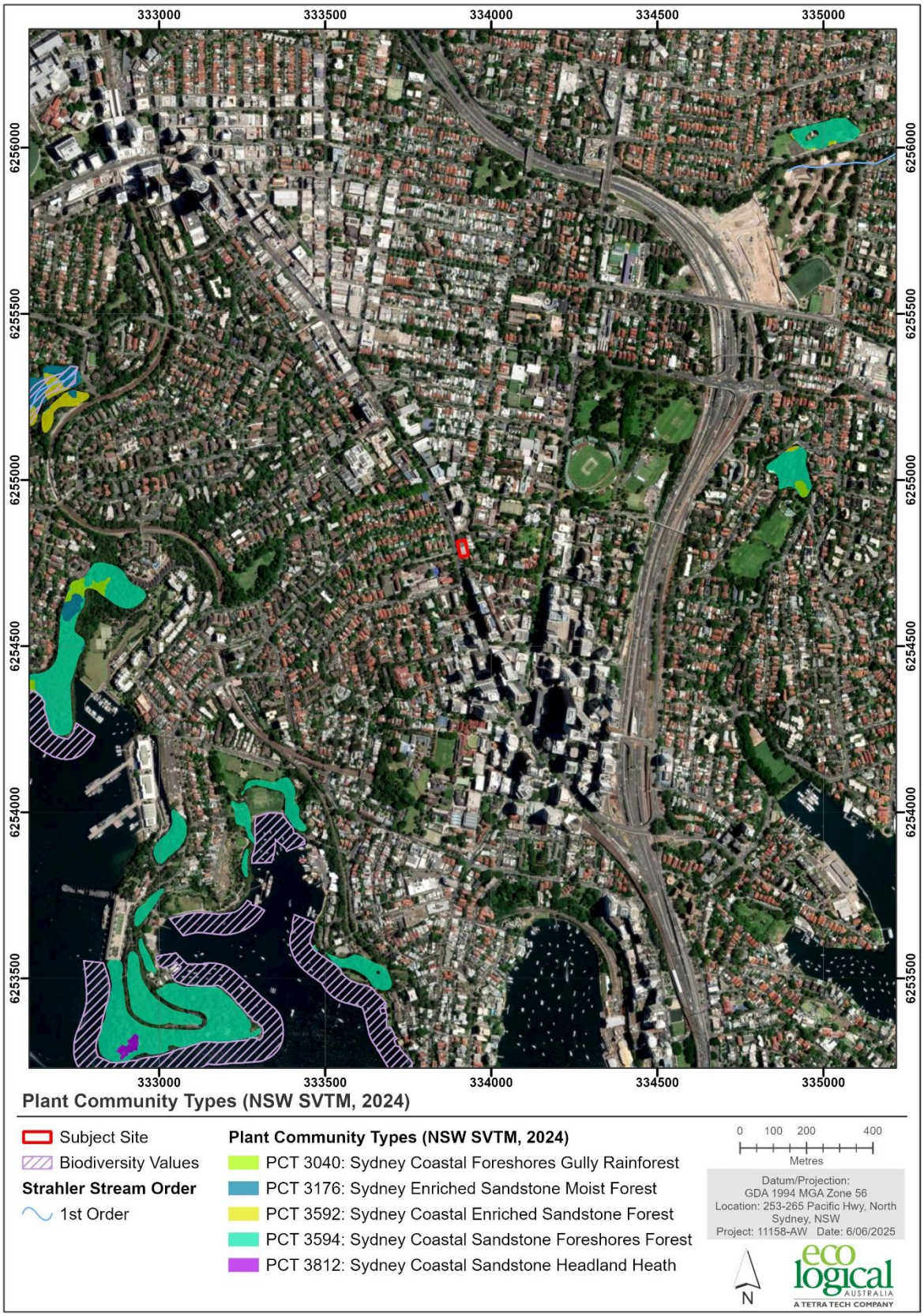


Figure 4: Plant Community Types mapped in the surrounding area (STVM) (NSW DCCEEW 2024)

Figure 5: Exotic *Platanus occidentalis* street trees to be retained, located along the Pacific Highway.

Figure 6: Concrete planter box containing mixed planted native and exotic vegetation in the courtyard of 255-259 Pacific Highway.

Figure 7: *Asplenium* sp. growing from building awning.

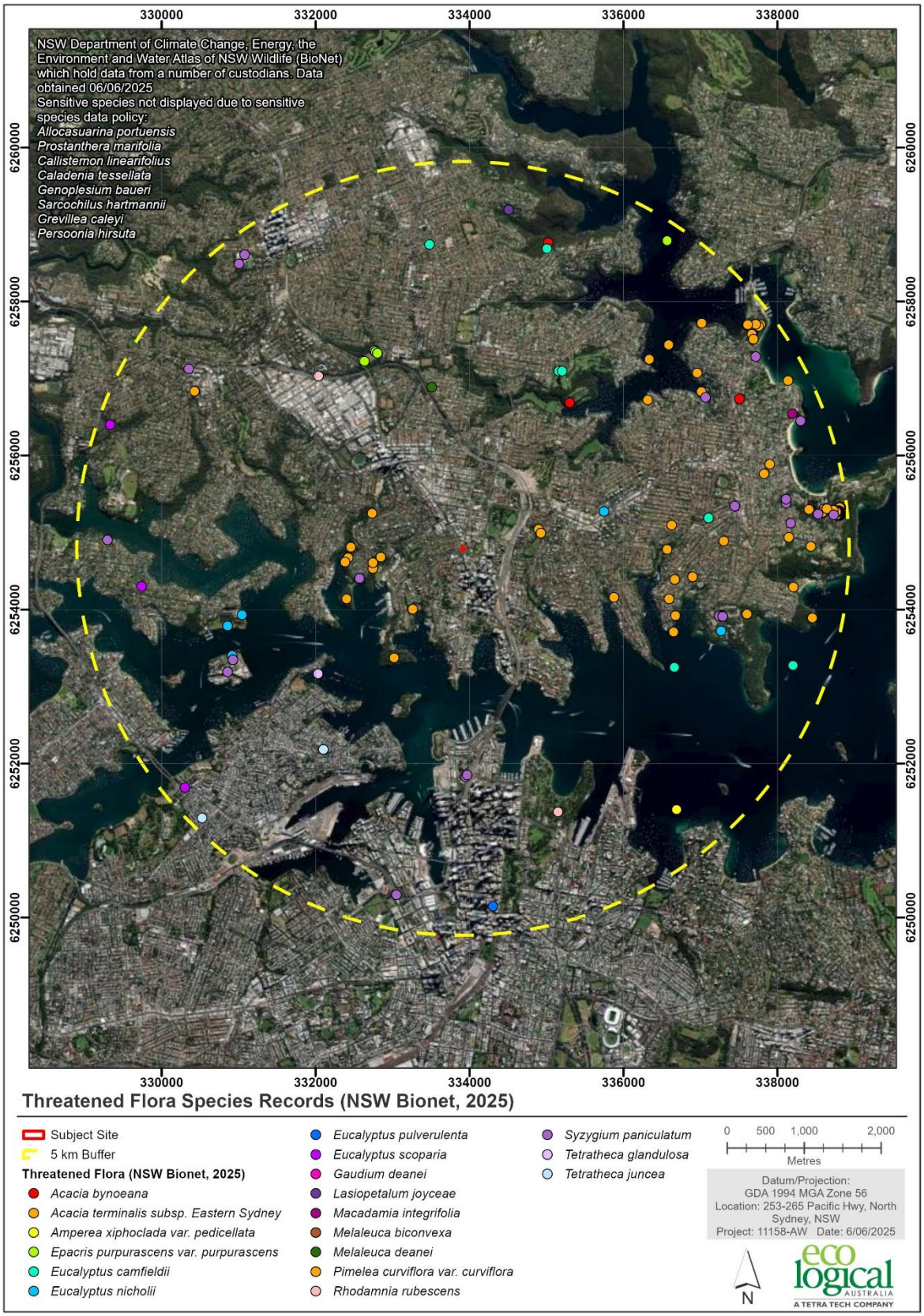


Figure 8: BioNet records for threatened flora within 5 km of the subject site (NSW DCCEEW 2024a)

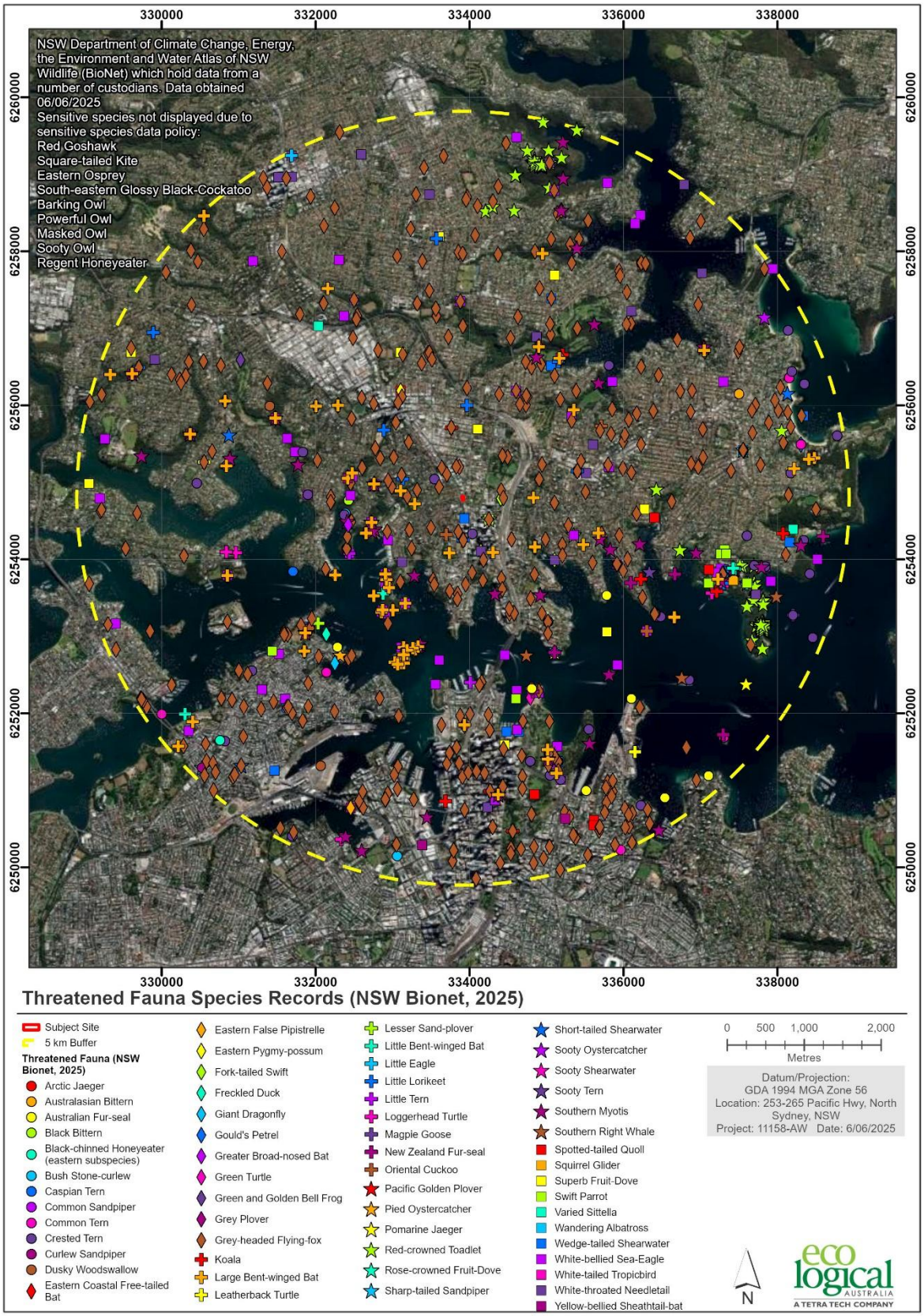


Figure 9: BioNet records for threatened fauna within 5 km of the subject site (NSW DCCEEW 2024a)

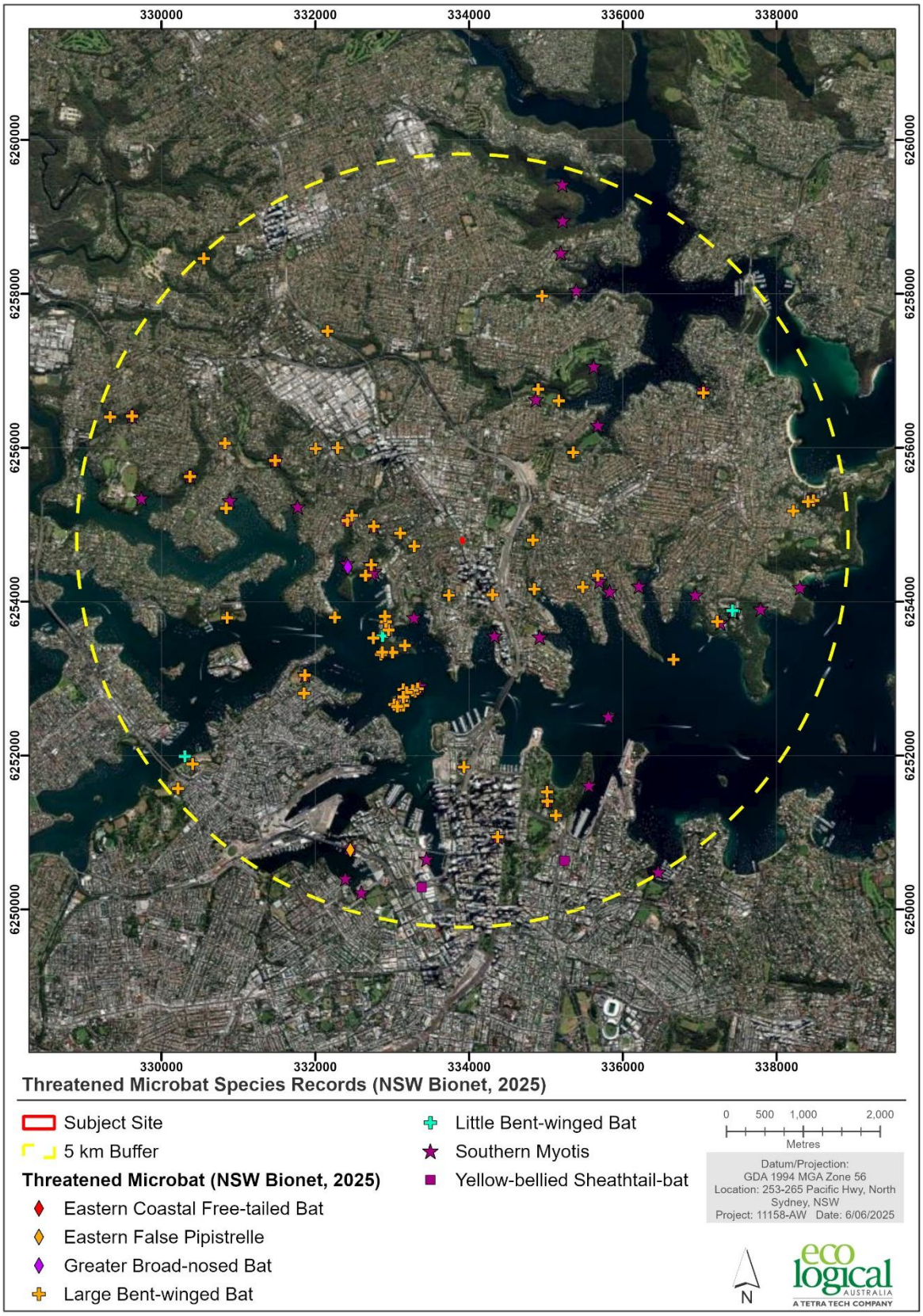


Figure 10: **BioNet records for threatened microbats within 5 km of the subject site (NSW DCCEEW 2024a)**

Figure 11: Potential microbat habitat identified within the subject site (locations are indicative only)

Figure 12: Potential entry point into underground space at rear of 253 Pacific Highway.

Figure 13: Opening under eave at 255-259 Pacific Highway.

Figure 14: Dilapidated shed at rear of 265 Pacific Highway.

Figure 15: Handheld ultrasonic detector being used to listen for microbats in the underground space.

References

Department of Planning, Industry & Environment (DPIE) 2019. How to apply for a biodiversity development assessment report waiver. Accessed July 2024 from http://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Biodiversity/apply-biodiversity-development-assessment-report-waiver-190593.pdf.

NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) 2025a. NSW BioNet: Atlas of NSW Wildlife online search tool. Accessed June 2025 from http://www.bionet.nsw.gov.au/.

NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) 2025b. Biodiversity Values Map and Threshold Tool (online). Accessed June 2025 from www.lmbc.nsw.gov.au/Maps/index.html?viewer=BOSETMap

NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) 2024. State Vegetation Type Map. Accessed June 2025.

NSW Office of Environment and Heritage (OEH) 2025. BioNet Threatened Biodiversity profiles. Accessed June 2025 from https://threatenedspecies.bionet.nsw.gov.au/

Appendix A Threatened Microbat Habitat Associations

Eight threatened microbat species have previously been recorded within 5 km of the subject site (Figure 10). No threatened microbat species have previously been recorded within the subject site. A daytime microbat roost search was undertaken to determine if microbats are present or have potential roosting habitat in the four disused commercial use buildings within the subject site.

No signs of microbat occupation (scat, staining or bat fly casings) or high-potential roosting habitat was identified during the survey.

Table 6: Likelihood of Occurrence – threatened microbat species

Species name	Common Name	Records in 5 km	Habitat associations	Likely to occur within subject site?
Falsistrellus tasmaniensis	Eastern False pipistrelle	5	Prefers moist habitats with trees greater than 20 m tall. Generally, roots in Eucalypt hollows but has been found under loose bark or in buildings. Hunts below the tree canopy (OEH 2025).	Unlikely to occur – Minimal nearby records to the subject site. Vegetation within and adjacent to the subject site does not comprise moist habitats with trees greater than 20 m tall and is therefore not preferential for this species. The subject site does not contain any tree hollows. While this species is known to roost in buildings, it is considered unlikely to occur within the subject site due to a lack of suitable surrounding habitat.
Micronomus norfolkensis	Eastern Coastal free-tailed bat	11	Occurs in dry sclerophyll forest, woodland, swamp forests and mangrove forests east of the Great Dividing Range. Roost mainly in tree hollows, but also will roost under bark or man-made structures. Maternity roosts usually occur in larger tree hollows.	Unlikely to occur – Minimal nearby records to the subject site. Vegetation within and adjacent to the subject site does not contain dry sclerophyll forest, woodland, swamp forests or mangrove forests and is therefore not preferential for this species. While this species is known to roost in buildings, it is considered unlikely to occur within the subject site due to a lack of suitable surrounding habitat.
Miniopterus australis	Little bent-winged bat	31	Prefers moist eucalypt forest, rainforest, vine thicket, wet and dry sclerophyll forest, swamps and dense coastal rainforest and scrub. This species primarily roosts in caves, tunnels, tree hollows, abandoned mines, stormwater drains, culverts, bridges and occasionally in buildings during the day. This species is known to roost with Large Bent-winged Bats.	Unlikely to occur – Vegetation within and adjacent to the subject site does not contain eucalypt forest, rainforest, vine thicket, wet and dry sclerophyll forest, swamps or dense coastal rainforest/scrub and is therefore not preferential for this species. While this species is known to roost in buildings, it is considered unlikely to occur within the subject site due to a lack of suitable surrounding habitat. The development site does not contain suitable maternity roost habitat.
Miniopterus orianae oceanensis	Large bent-winged bat	95	Hunts in forested areas above the canopy. This species primarily roosts in caves, but is known to use derelict mines, storm-water drains, buildings and other human made structures. There are just a few	Potential to occur - based on the number of local records and proximity of closest record to the subject site. Unlikely to be roosting – Local records predominantly occur in more densely vegetated areas.

Species name	Common Name	Records in 5 km	Habitat associations	Likely to occur within subject site?
			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.	Vegetation within and adjacent to the subject site is not forested and is therefore not preferential for this species. While this species is known to roost in buildings, it is considered unlikely to be roosting within the subject site due to a lack of suitable surrounding habitat. The development site does not contain suitable maternity roost habitat.
Myotis macropus	Southern myotis	46	Roosts in a wide range of habitats close to water, including caves, hollow-bearing trees, dense foliage, storm water drains, mine shafts, and other human made structures. This species forages over streams and pooled water.	Unlikely to occur – The majority of local records for this species occur along the coast or foreshore of the harbour where there is ample foraging habitat for this species. The nearest water body is Sydney Harbour, approximately 1 km south of the subject site. This species is considered unlikely to use buildings within the site for roosting given they are more than 200 m from a natural water body.
Saccolaimus flaviventris	Yellow-bellied sheathtail-bat	9	Forages in a most habitats within its range. This species roosts solitarily or in groups of up to six in tree hollows, buildings and occasionally mammal burrows. Maternity roosts are presumed to be located in large tree cavities (OEH 2025).	Potential to occur. Unlikely to be roosting – Minimal nearby records to the subject site and most occur in more densely vegetated areas. This species is known to roost in buildings, though generally prefers hollow bearing trees. It is presumed that maternity roost for this species occur in tree hollows. There are no tree hollows in the subject site, hence it is unlikely to be suitable for maternity roosting. Other roosting habitat is not considered high potential.
Scoteanax rueppellii	Greater broad-nosed bat	3	Found primarily in gullies and along river systems that feed into the Great Dividing Range. Most often occurs in tall wet forest but is known to utilise other woodlands and dry sclerophyll forests. Roosting usually occurs in tree hollows but has been documented in buildings as well.	Unlikely to occur – Minimal nearby records to the subject site. Vegetation within and adjacent to the subject site does not form part of a gully along a river system and is therefore not preferential for this species. While this species is known to roost in buildings, it is considered unlikely to occur within the subject site due to a lack of suitable surrounding habitat.

Appendix B Site plans

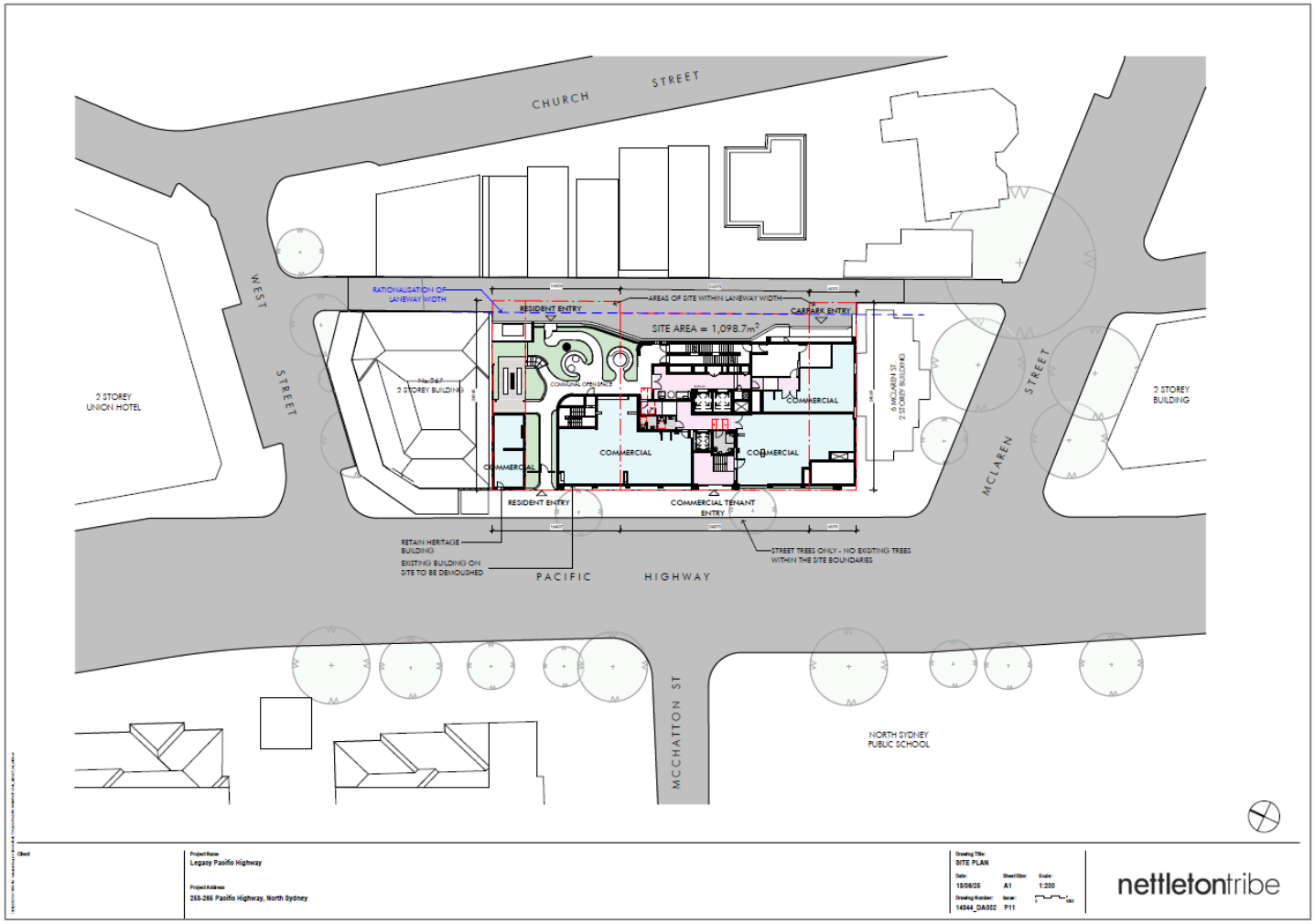


Figure 16: Site plan

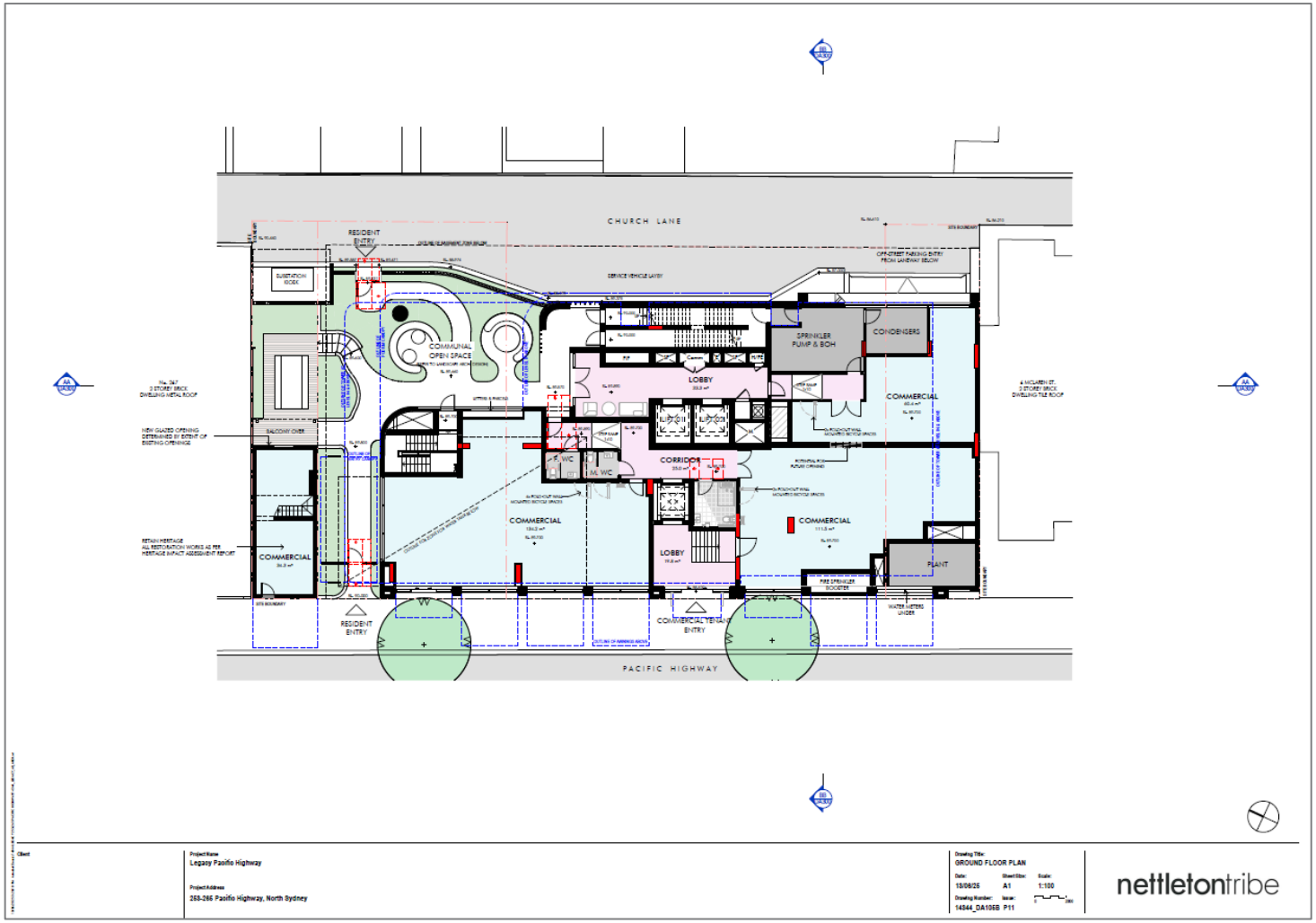


Figure 17: Ground floor

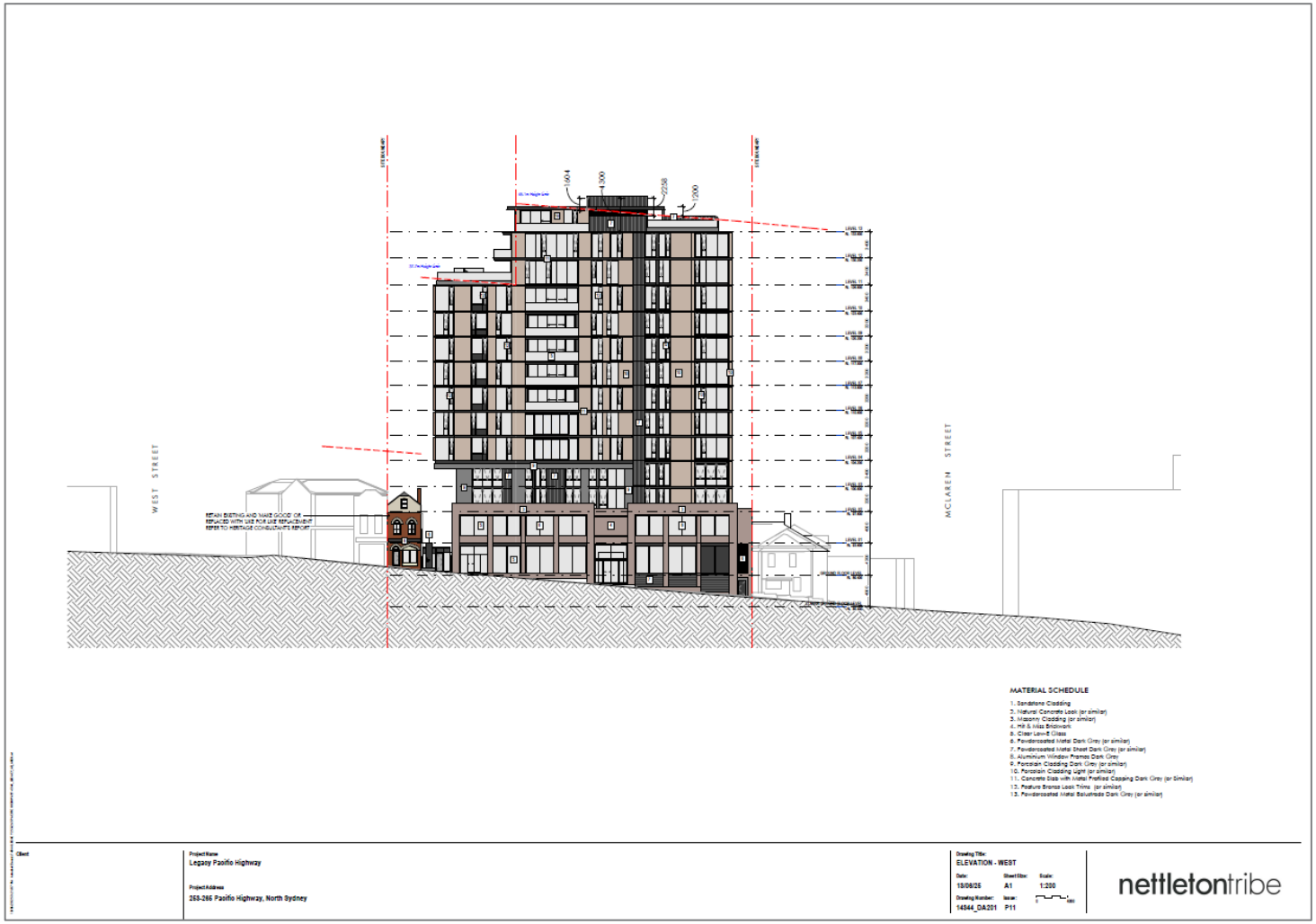


Figure 18: Elevation West

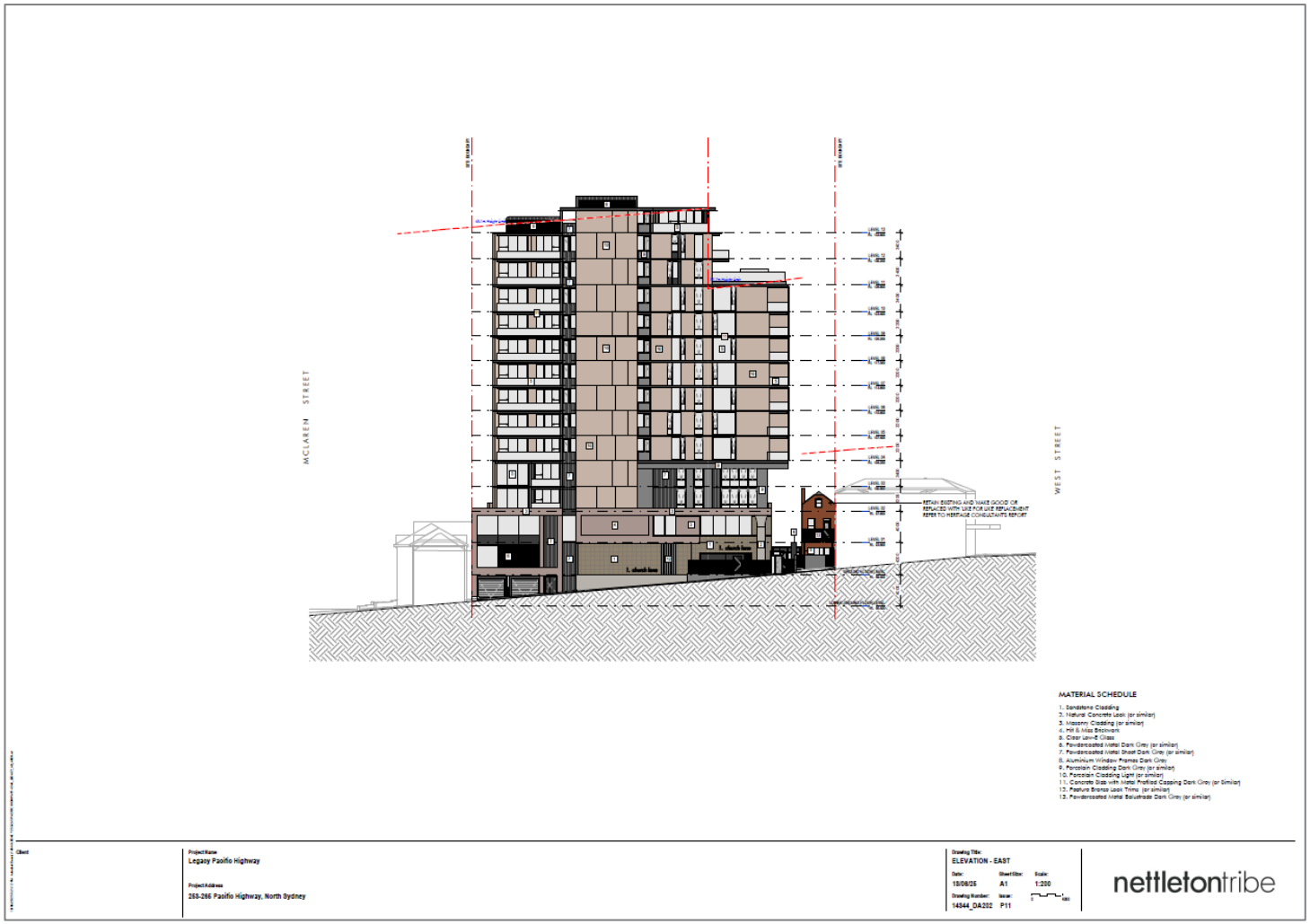


Figure 19: Elevation East