



Ms. Lisa Wrightson
Barker Ryan Stewart Pty Ltd
Suite 603, Level 6, 12 Century Circuit
Norwest Business Park NSW 2153

Our ref: SSD 8790

-via email-

Lisa@brs.com.au

Dear Ms Wrightson

Subject: Parramatta West Public School Redevelopment (SSD 8790) – Request to waive the need for a BDAR under the Biodiversity Conservation Act 2016

I refer to your correspondence dated 3 August 2018 and 21 August 2018, regarding the request to waive the need for a Biodiversity Development Assessment Report (BDAR) to be submitted as part of the above referenced State significant development (SSD) application.

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

“Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.”

The authority of the “Planning Agency Head” to determine whether a proposed development is “not likely to have any significant impact on biodiversity values” has been delegated to Directors within the Planning Services Division on 21 December 2017.

I have reviewed the application of the test of significance under sections 1.5 and 7.3 of the BCA and clause 1.4 of the *Biodiversity Conservation Regulation 2017* and determine that the development (as described in the letter from Barker Ryan Stewart dated 3 August 2018) is not likely to have any significant impact on biodiversity values. The application, therefore, does not need to be accompanied by a BDAR. Accordingly, a waiver under section 7.9 is granted for the proposed development (being Parramatta West Public School Redevelopment – SSD 8790).

The delegated *Environment Agency Head* in the Office of Environment and Heritage (OEH) has also granted a waiver in a letter dated 4 September 2018 and a copy of that letter is attached.

This waiver is issued in respect of the proposed development detailed in a request for Planning Secretary’s environmental assessment requirements (SEARs) dated 24 January 2018. Amendments to the development may require a further waiver to be sought and issued. In finalising the Environmental Impact Assessment, particular consideration must be given to the specific advice provided by OEH in their waiver in relation to the presence on site of Narrow-leaved Black Peppermint (*Eucalyptus nicholii*) which occurs on the northern and western boundaries of the site to ensure they are not impacted by the development.

Should you have any enquiries regarding the above matter, please contact Aditi Coomar on 8217 2097 or via email to aditi.coomar@planning.nsw.gov.au.

Yours sincerely,



5/09/2018

Karen Harragon

Director, Social and Other Infrastructure Assessments
As delegate of the Secretary

Attachment: OEH Waiver

DOC18/557935
SSD 8790

Aditi Coomar
Acting Principal Planner– Social and Other Infrastructure Assessments
NSW Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Request for Biodiversity Development Assessment Report waiver for Parramatta West Public School at Auburn and Young Street, Parramatta (SSD 8790)

Dear Ms Coomar,

The Office of Environment and Heritage (OEH) has reviewed the request from Molino Stewart on behalf of the Department of Education dated 22 August 2018, to waive the requirement for a Biodiversity Development Assessment Report (BDAR) to be submitted with the State significant development application.

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

“Any such application [SSD] is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.”

The power to determine whether an SSD is “*not likely to have any significant impact on biodiversity values*” has been delegated to the OEH Senior Executive on 4 December 2017.

I have reviewed the assessment of the biodiversity values of the site as described in the amended documentation submitted on the 22 August 2018. I have determined that based on the current proposal, the development is not likely to have any significant impact on biodiversity values and that there is no need for the SSD application to include a BDAR.

However, please be advised that if the footprint of this project changes such that the three trees of the threatened species, Narrow-leaved Black Peppermint (*Eucalyptus nicholii*) which occur on the northern and western boundaries of the site are impacted, an assessment of significance in accordance with section 7.3 of the *Biodiversity Conservation Act 2016* should be undertaken prior to approval. The outcome of this assessment may affect this decision to waive the requirement for a BDAR.

Further, with reference to page 2 of the Molino Stewart report dated 29 May 2018, it states that *"Discussions were held with the Office of Environment and Heritage's BAM specialist, John Siedel (sic), who indicated that because the site consists of planted trees with no remnant native vegetation that a BDAR prepared with a BAM assessment would not be required"*. OEH advises this is incorrect. The advice provided was that in instances where the site consists of planted trees with no remnant native vegetation, a BDAR waiver could be applied for. Staff cannot advise if a BDAR is required. If a proponent considers a BDAR is not required, a waiver must be formally requested from OEH, and this request must be accompanied by documentation which addresses the relevant sections of the legislation.

Please contact Svetlana Kotevska on 8837 6040 or at Svetlana.kotevska@environment.nsw.gov.au should you have any further queries regarding this matter.

Yours sincerely



04/09/2018

ALEX GRAHAM
Director - Greater Sydney
Communities and Greater Sydney Division

Our Ref:CC160183

3 August 2018

Secretary
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2000

Dear Sir / Madam,

URGENT - BDAR Waiver Request - Parramatta West Public School SSD 8790

I refer to recent discussions with Aditi Coomar about the abovementioned State Significant Development (SSD) Application and the requirement for a Biodiversity Development Assessment Report (BDAR) or a BDAR waiver.

As the vegetation on the site is planted, it does not fall within a Biodiversity Assessment Method (BAM) native vegetation community, and as such a BDAR is unable to be prepared. Therefore, we request the Department of Planning and Environment agree to waive the requirement for a BDAR for this SSD application.

Attached is a biodiversity assessment for the site prepared by Molino Stewart, based on discussions with John Siedel from the NSW Office of Environment and Heritage. It addresses the site and details why the requirement for a BDAR should be waived, including reference to Section 7.3 tests.

We hoped that this waiver could be issued as soon as possible, so that the submission of the application for the school expansion is not delayed further. As discussed with Aditi there has been some misunderstanding about the process for the BDAR and waiver in relation to the SSD application and assistance to speed up the process is appreciated.

I can be contacted on as detailed below or on 0409 681669 or email lisa@brs.com.au if you have any questions or require further information.

Yours faithfully

Lisa Wrightson | Senior Town Planner
Barker Ryan Stewart Pty Ltd

SYDNEY

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21/08/2018

Jane McGarry
Senior Associate
Conrad Gargett
Suite C3, 18/22-26 Mountain Street
Ultimo NSW 2007

Dear Jane,

Re: Request for additional information from OEH - BDAR Waiver Request for Parramatta West Public School Redevelopment (SSD 8790)

The NSW Office of Environment and Heritage (OEH) has reviewed the request to waive the requirement for a Biodiversity Development Assessment Report (BDAR) to be submitted with the State significant development application for the proposed alterations and additions to Parramatta West Public School(SSD 8790), and has advised that the Waiver request needs to address the following sections of the Biodiversity Conservation Act 2016 and the Biodiversity Conservation Regulation 2017, prior to further assessment being conducted:

- section 1.5 of the Biodiversity Conservation Act 2016; and
- clauses 1.4 and 6.1 of the Biodiversity Conservation Regulation 2017.

This issue has been addressed below.

Issue raised by OEH:

The BDAR waiver request should address each of the factors in section 1.5 of the Biodiversity Conservation Act 2016 and clause 1.4 of the Biodiversity Conservation Regulation 2017 (BC Reg.), and also address each of the prescribed biodiversity impacts as set out in clause 6.1 of BC Reg.

Response:

These sections of the legislation are addressed in the table below, including references to specific sections of the biodiversity assessment where relevant.

Section of Legislation	Response
<i>BC Act Section 1.5 Biodiversity and biodiversity values for purposes of Act</i>	
<i>(2) For the purposes of this Act, biodiversity values are the following biodiversity values:</i>	
<i>(a) vegetation integrity—being 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</i>	The landform and vegetation on the site and surrounding land is highly modified. The site consists of planted trees along the perimeter of the fields with no remnant native vegetation.

<i>(b) habitat suitability—being the degree to which the habitat needs of threatened species are present at a particular site</i>	Habitat suitability present at the site for specific threatened species is addressed in Section 3 and Attachments B & C of the biodiversity assessment. The conclusion of the assessment is that it is not considered to have a significant impact on threatened species of fauna as there will be no remnant vegetation affected.
<i>(c) biodiversity values, or biodiversity-related values, prescribed by the regulations.</i>	Biodiversity values is addressed in Section 3 of the biodiversity assessment and summarised below. The vegetation on the site has been identified as Urban Native and Exotic Cover in 2016 by the Office of Environment and Heritage (OEH) mapping. This vegetation type is not a recognised plant community type (PCT) and on this basis, is not likely to provide any important biodiversity values or ecological constraints.
BC Reg. Clause 1.4 Additional biodiversity values (section 1.5 of the Act)	
<i>The following are prescribed as additional biodiversity values for the purposes of the Act:</i>	
<i>(a) threatened species abundance—being the occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site</i>	There is one threatened flora species onsite, the Narrow-leaved Black Peppermint (<i>Eucalyptus nicholii</i>), present as three planted specimens on the northern and western boundaries. Considering this species is not within natural habitats as part of a viable population in the locality and is not known as part of a naturally occurring population within the Interim Biogeographic Regionalisation for Australia (IBRA) Bioregion, the presence on site is unlikely to be a substantial ecological constraint. An analysis of the potential for the site to provide habitat for the locally recorded threatened species is addressed in Section 3 and Attachments B & C of the biodiversity assessment.
<i>(b) vegetation abundance—being the occurrence and abundance of vegetation at a particular site</i>	Vegetation present at the site is addressed in Sections 3 & 4 of the biodiversity assessment and summarised below. The landform and vegetation on the site and surrounding land is highly modified. The site comprises cleared land and a mix of exotic and native planted trees.
<i>(c) habitat connectivity—being the degree to which a particular site connects different</i>	The site and immediate local area consists mainly of cleared land. The remnant

<i>areas of habitat of threatened species to facilitate the movement of those species across their range</i>	vegetation in the locality is limited to that around major waterways such as the Parramatta River and tributary creeks such as ABecketts Creek and Finlayson Creek (all over one km from the site), remaining vegetation within the school property, along roadsides and within urban parks. There is no vegetation being removed that is considered to provide critical habitat connectivity.
<i>(d) threatened species movement—being the degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle</i>	The only threatened species that are likely to use the site are highly mobile microbats. Other highly mobile flying species such as birds or flying foxes may also use the site. The impacts on threatened fauna have been considered in Assessments of Significance undertaken for the Grey-headed Flying Fox and microbats (Section 3 and Attachment C of biodiversity assessment). The conclusion of the assessment is that it is not considered to have a significant impact on threatened species of fauna as there will be no remnant vegetation affected.
<i>(e) flight path integrity—being the degree to which the flight paths of protected animals over a particular site are free from interference</i>	The only threatened species known to use the site are highly mobile microbats. Other highly mobile flying species such as birds or flying foxes may also use the site. The proposed school is two storey and below the height of retained trees within the school complex and surrounding streets, and is not expected to interfere with flight paths.
<i>(f) water sustainability—being the degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site</i>	There are no open water bodies present on site. Attention to hydrological processes during development will only be required during soil preparation. Soil preparation is to be done manually within the Tree Protection Zones (TPZs). Subgrade soils are to be addressed according to arborist specifications to not restrict the flow of air or water.
Prescribed Impacts <i>BC Reg. Clause 6.1 Additional biodiversity impacts to which scheme applies (sections 6.3 and 6.6 (2))</i> <i>(1) The impacts on biodiversity values of the following actions are prescribed (subject to subclause (2)) as biodiversity impacts to be assessed under the biodiversity offsets scheme:</i>	
<i>(a) the impacts of development on the following habitat of threatened species or ecological communities:</i>	The only one of these features present at the site is non-native vegetation (iv). This has been addressed in Sections 4 and 5 and

(i) karst, caves, crevices, cliffs and other geological features of significance, (ii) rocks, (iii) human made structures (iv) non-native vegetation	Appendix C of the biodiversity assessment report. The conclusion of the assessment is that removal of non-native vegetation is not considered to have a significant impact on threatened species of fauna. Impact of removal of exotic grasses present would not provide any threatened species habitat. There are no areas of woody weeds that would provide shelter for fauna or exotic fruiting trees that would provide foraging habitat.
(b) the impacts of development on the connectivity of different areas of habitat of threatened species that facilitates the movement of those species across their range	The site and immediate local area consists of heavily cleared and urbanised land, with only fragmented connectivity of canopy trees remaining in the Parramatta West vicinity. The planted trees to be removed would not isolate any potential habitat for the highly mobile microbat species.
(c) the impacts of development on movement of threatened species that maintains their lifecycle	The only threatened species likely to currently use the site are highly mobile flying species such as birds and bats. The development will not interfere with the movement of these fauna as the planted trees to be removed would not isolate any potential habitat for these highly mobile microbat species.
(d) the impacts of development on water quality, water bodies and hydrological processes that sustain threatened species and threatened ecological communities (including from subsidence or upsidence resulting from underground mining or other development)	There are no open water bodies present on site. Attention to hydrological processes during development will only be required during soil preparation. Soil preparation is to be done manually within the TPZs. Subgrade soils are to be addressed according to arborist specifications to not restrict the flow of air or water.
(e) the impacts of wind turbine strikes on protected animals	NA
(f) the impacts of vehicle strikes on threatened species of animals or on animals that are part of a threatened ecological community	The proposal will increase traffic movement in the urban streets during drop-off and pick-up time around the school, mainly during the day when fauna are less active. Due to the cleared and disturbed nature of the surrounding lands, an increase in vehicle strikes on threatened species is not anticipated.

In summary the Biodiversity Assessment report and this letter:

- clearly specify and address the biodiversity values of the site as outlined in the above table and Section 3 of the report;
- assess the impacts in the above table and in Section 4 and Attachment C of the report;
- recommend methods to minimise and mitigate the impacts on the biodiversity in Section 5 and Attachment C of the report; and
- conclude that the proposed school alterations and additions are not likely to have a significant impact on biodiversity values in Section 6 and Attachment C of the report, and that there is no need for the Environmental Impact Statement (EIS) for the SSD to include a BDAR.

We trust that this letter provides the information required by OEH to complete their assessment.

Yours faithfully

For Molino Stewart Pty Ltd

A handwritten signature in black ink, appearing to read 'S Molino', with a stylized, cursive script.

Steven Molino

Principal

Enclosures: 1

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Assessment\Reports\Final\1030 BDAR Waiver Request for Parramatta West Public School
Redevelopment (SSD 8790).docx

29/05/2018

Ian Tsui
Project Architect
Conrad Gargett
Suite C3, 18/22-26 Mountain Street
Ultimo NSW 2007

Dear Ian,

Re: Biodiversity Assessment – Reissued SEARS for the Alterations and Additions to Parramatta West Public School

1. Background

Molino Stewart was engaged by Conrad Gargett to undertake a biodiversity assessment for Stage 1 of the proposed alterations and additions to Parramatta West Public School. The school is located in Young Street, Parramatta. The proposed addition to the school is to encompass the eastern part of Lot 406 DP 729083, Burra Reserve, Crimea Street, Parramatta, herein referred to as the 'North Site'.

The Stage 1 building works will occur on the east side of the North Site and will include the construction of the new hall, the staff/ administration and home base building and landscape works. The site is currently characterised by open space with grass, surrounded by native and exotic tree plantings around the perimeter with seating under the trees and a metal fence with a locked access gate (see footprint in Attachment A). The western part of the North Site will be used as a site compound during construction.

The alterations and additions to the school is required to be assessed as a State Significant Development (SSD). This requires the preparation of a Biodiversity Assessment to meet the requirements of the Secretary's Environmental Assessment Requirements (SEARs), as reissued to reflect the requirements of the Biodiversity Conservation Act 2016 which came into force on 25 February 2018:

'19. Biodiversity

Biodiversity impacts related to the proposal and the preparation of a Biodiversity Assessment are to be addressed in accordance with the requirements of the Biodiversity Conservation Act 2016.'

2. Legislation

Biodiversity Assessment Method

The *NSW Biodiversity Conservation Act 2016* (BC Act) states that a Biodiversity Assessment for State Significant Development requires that an application is to 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.

The environmental impact statement that accompanies the application is to include the biodiversity assessment as required by the SEARs. All major projects are required to complete a Biodiversity Assessment Method (BAM) to determine any offset liabilities under the Biodiversity Offsets Scheme (BOS) unless determined not to have a significant impact on biodiversity values.

Discussions were held with the Office of Environment and Heritage's BAM specialist, John Siedel, who indicated that because the site consists of planted trees with no remnant native vegetation that a BDAR prepared with a BAM assessment would not be required. This information was conveyed to the client who advised that a waiver to preparing a BDAR will be requested from the Department of Planning and Environment and that a Biodiversity Assessment Report would be appropriate for the development.

Trees

As noted above, trees have been planted along the perimeter of the fields on the site. This Biodiversity Assessment Report addresses the impacts of their removal in accordance with the BC Act. An arboricultural assessment of all trees has been prepared for the proposed development.

Should any future additional removal of trees be required, any tree clearing in urban areas that is not part of a development application is now regulated under *State Environmental Planning Policy (Vegetation in Non-rural Areas) 2017*. For any additional future tree clearing proposed would need to consider the Holroyd Development Control Plan (DCP) for specific tree impact assessment requirements.

Weeds

Weeds on the site are addressed in this report in accordance with the *Biosecurity Act 2015* and the 'Greater Sydney Regional Strategic Weed Management Plan 2017-2022'. The Act provides powers to Local Control Authorities to take action in relation to weeds listed in various categories as State Priority Weeds, Regional Priority Weeds and Weeds of Other Regional Concern.

3. Existing Biodiversity Values

Vegetation Communities

Vegetation on the site has been identified as Urban Native and Exotic Cover (refer to Attachment A) in the broad-scale vegetation mapping for the Sydney Metropolitan Area undertaken by the NSW Office of Environment and Heritage (OEH 2016). This vegetation type identified on site (OEH 2016) is not a recognised plant community type (PCT) and on this basis, is not likely to provide any important biodiversity values or ecological constraints.

Planted trees species include the local native species: Mugga Ironbark (*Eucalyptus sideroxylon*), Spotted Gum (*Corymbia maculata*), Narrow-leaved Scribbly gum (*Eucalyptus racemosa*), Narrow-leaved Ironbark (*Eucalyptus crebra*), Broad-leaved Paperbark (*Melaleuca quinquenervia*), River Oak (*Casuarina cunninghamiana*), Swamp Oak (*Casuarina glauca*), Water Gum (*Tristanopsis laurina*) and non-local native species such as Tallowwood (*Eucalyptus microcorys*), Brush Box (*Lophostemon confertus*), Lemon-scented Gum (*Corymbia citriodora*), Narrow-leaved Black Peppermint (*Eucalyptus nicholii*), Argyle Apple (*Eucalyptus cinerea*), Silky Oak (*Grevillea robusta*), Weeping Bottlebrush (*Callistemon viminalis*) and White Cedar (*Melia azedarach*) and Cadaghi (*Corymbia torelliana*). Exotic tree species are also present in low abundance including Liquidamber (*Liquidamber styraciflua*), Box-elder Maple (*Acer negundo*), Elm (*Ulmus sp.*) and Claret Ash (*Fraxinus raywood*).

Weeds

Camphor Laurel (*Cinnamomum camphora*) is a weed found on the site comprising one larger individual tree on the northern boundary of Burra Reserve with Crimea Road Reserve.

The weed is listed in the 'Greater Sydney Regional Strategic Weed Management Plan 2017-2022' in the category of 'other weeds of regional concern' recognising that whether a plant is a weed depends on the location, and that some plants grown as crops may function as weeds in other land uses. These species have been identified as a potential risk in some situations and many pose potential risks to biodiversity. Some of the species pose potential risks to agriculture and some of the weeds pose potential risks to human health. In most situations this is when ingested but can also include risks associated with asthma and other allergic reactions. The plan recognises that many weeds are already so well established that they can only be managed and will never be eradicated from the region. These species may warrant resources for control or management and are a priority to keep out of the region. Land managers may prioritise action in certain circumstances where it can be demonstrated the weed poses a threat to the environment, agriculture and/or the community/ human health. The Biosecurity Act 2015 provides powers to Local Control Authorities to take action in relation to these weeds in particular circumstances, for example where a weed threatens a high value asset and prevention, elimination or reduction of the risk is feasible and reasonable.

Under the plan, Camphor Laurel poses a risk to the Environment, Agriculture and Human health and its removal should be undertaken as part of the site works.

Threatened Species

A likelihood of occurrence has been prepared for threatened species that occur within 10km of the site (Attachment B). Threatened fauna species with the greatest potential to utilise the site are highly mobile species including bat and bird species. Microbat species could also potentially forage on site and potentially utilise cavities within buildings, culverts and pipes in the locality. The other threatened species likely to forage on site is the Grey-headed Flying-fox. The absence of aquatic habitats excludes the presence of wetland birds and habitat for threatened amphibian species such as the Green and Golden Bell Frog.

There is one threatened flora species onsite, the Narrow-leaved Black Peppermint (*Eucalyptus nicholii*), present as three planted specimens on the northern and western boundaries. This threatened tree species is indigenous to the New England Tablelands and is commonly used in landscaping throughout the Sydney region. Considering this species is not within natural habitats as part of a viable population in the locality, the presence on site is unlikely to be a substantial ecological constraint. This tree is unlikely to be impacted from the proposed development. Moreover, the site is unlikely to support viable populations of threatened flora species considering the highly modified nature of the habitats.

There were no additional threatened flora species identified on the site.

4. Impacts on Biodiversity Values

Impact on vegetation is the removal of thirty seven planted native and exotic trees from the eastern part of the site to facilitate the construction of the Stage 1A Building Works. This includes seventeen (17) trees of higher retention value:

- T39 1 x *E. crebra*,
- T42 & 43 2 x *C. citriodora*,
- T55-58 & T60 5 x *Cas. cunninghamiana*,

- T61 1 x *Cas. glauca*,
- T71, 75 & 76 3 x *E. sideroxylon*,
- T78 & 79 2 x *C. maculata*,
- T81 & 86 2 x *E. microcorys*, and
- T87 1 x *L. confertus*.

It also includes sixteen (16) trees of lower retention value:

- T38, 46&47, 50 – 52, 92 7 x *L. confertus*,
- T40 1 x *Euc. sp.*,
- T41, 93&94 3 x *C. maculata*,
- T 66 1 x *M. quinquenervia*,
- T67&68 2 x *Mel. azedarach*, and
- T77&80 2 x *E. sideroxylon*.

An additional impact is the contractor's site access and deliveries to occur from the north in Crimea Street. This will require the remove of T34 *Cinnamomum camphora*.

The impact on native fauna is the removal of 38 out of the 94 trees. The impacts on threatened fauna have been considered in Assessments of Significance undertaken for the Grey-headed Flying Fox and Microbats (Attachment C). The conclusion of the assessment is that it is not considered to have a significant impact on threatened species of fauna as there will be no remnant vegetation affected.

5. Recommended Mitigation Measures

All trees noted for retention in the Arborist's Report are to be protected by adherence to the detailed specifications in the arborists report including:

- appointment of a project arborist who will supervise, sign off and approve all site tree works,
- installation of tree protection fencing in accordance with AS 4970-2009 Protection of Trees on Development Sites,
- retention of existing soil grades for paving where there is encroachment into the Tree Protection Zone,
- avoidance of soil compaction through working from inside the footprint, protection of ground surfaces, manual removal of existing grass with TPZ, careful removal of sub base soils,
- soil preparation to be done manually with TPZs, subgrade soils to be according to arborist specifications to not restrict the flow of air or water, and
- detailed site specific landscaping according to the arborist specification relating to new paving, grass, planting within TPZs and avoiding location of underground pipes/ services within TPZs.

Our additional recommended mitigation measures include:

- The Camphor Laurel should be removed as part of the site works. No part of the Camphor Laurel is to be reused on site. This includes the leaves, seeds or timber

which are not to be reused on site to prevent seed spread and prevent the entry of phytotoxins into the soil.

- An erosion and sedimentation control plan should be implemented on the site.
- Works should not be undertaken at night to avoid any impacts on foraging native fauna.
- Any future development application or tree removal pertaining to the site will need to consider potential impacts on existing trees, in accordance with the arboricultural assessment.
- The side access gates are to be located to avoid damage to existing trees.
- During works should any native fauna be located in the trees the contractor is to cease work on the tree and call WIRES if the fauna has not relocated of its own accord.

6. Conclusion

In conclusion the proposed school alterations and additions would not have a significant impact on the biodiversity values of the site, and provided the mitigation measures above are implemented, ecological impacts are likely to be minimal.

Overall, the removal of 38 planted native and exotic trees from the site is not likely to have a significant impact on the biodiversity values of the site considering the highly modified nature of the site with substantial areas of open space and surrounding planted trees. There is no evidence of remnant vegetation present on the site, with all trees and shrubs comprising native and exotic planted vegetation.

There will be retention and protection of canopy on the west of the site and the remaining trees will be protected during site works. No work will be undertaken at night thereby not disturbing any native fauna that may use the site for foraging.

The biodiversity impacts are not significant based on the Biodiversity Assessment and a BDAR is not required due to the following:

- The proposed development activity is unlikely to have a ‘significant impact’ on any threatened species, threatened populations or endangered ecological communities listed under the tests under *Section 7.3 of the NSW Biodiversity Conservation Act 2016* or the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*.
- It does not exceed the biodiversity offsets scheme threshold as
 - no areas within the site are mapped as having ‘high biodiversity value’ as identified on the NSW Biodiversity Values Map. (Attachment D); and
 - vegetation clearing on the site will not exceed the native vegetation clearing thresholds identified in the Biodiversity Assessment Method as the site is not remnant vegetation and the clearing is less than 0.25ha for the minimum lot size of less than 1 ha.
- The development is not being carried out in it is carried out in a declared area of outstanding biodiversity value.

7. References

Greater Sydney Local Land Services 2017 Greater Sydney Regional Strategic Weed Management Plan 2017-2022.

Office of Environment and Heritage 2018 Biodiversity Values Map
<https://www.lmbc.nsw.gov.au/Maps/index.html?viewer=BVMap>

Office of Environment and Heritage 2016. The Native Vegetation of the Sydney Metropolitan Area. Office of Environment and Heritage, Sydney.

Yours faithfully

For Molino Stewart Pty Ltd



Shireen Baguley

Principal

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Attachment A: Mapping - Footprint and Vegetation



Development footprint



Vegetation mapping by OEH - urban exotics/ native

Attachment B Likelihood of Occurrence

Family	Species	Common Name	Habitat	Likelihood at Subject Site
Apocynaceae	<i>Marsdenia viridiflora</i> subsp. <i>viridiflora</i>	Marsdenia viridiflora R. Br. subsp. viridiflora population in the Bankstown, Blacktown, Camden, Campbelltown, Fairfield, Holroyd, Liverpool and Penrith local government areas	Grows in vine thickets and open shale woodland	Unlikely
Convolvulaceae	<i>Wilsonia backhousei</i>	Narrow-leafed Wilsonia	The species habitat is the margins of salt marshes and lakes	Unlikely
Ericaceae	<i>Epacris purpurascens</i> var. <i>purpurascens</i>		Found in a range of vegetation communities growing in areas with strong shale soil influence	Unlikely
Fabaceae	<i>Acacia pubescens</i>	Downy Wattle	This species occurs on ridges, hillsides and flat areas, at altitudes up to 650 m asl.	Unlikely
	<i>Pultenaea pedunculata</i>	Matted Bush-pea	Occurs in a range of habitats, in NSW generally in woodland vegetation but plants occur on road batters and coastal cliffs. Confined to loamy soils in dry gullies in populations in Windellama. A coloniser of bare ground after disturbance as well as after fire, although the fire response is unknown. In the Cumberland Plain the species favours sites in clay or sandy-clay soils (Blacktown Soil Landscape) on Wianamatta Shale-derived soils, usually close to patches of Tertiary Alluvium (Liverpool area) or at or near the Shale-Sandstone interface (Appin). All sites have a lateritic influence with ironstone gravel (nodules) present. In the Liverpool - Fairfield area the majority of occurrences are in lower-lying areas and often close	Unlikely

			to creek lines. Soils are moderately to poorly drained. Appin sites are on a plateau above the Nepean River, on soils that are not usually poorly drained. On the Cumberland Plain the species is recorded from Cumberland Plain Woodlands, the shale-soil form of Shale Sandstone Transition Forests and Cooks River/Castlereagh Ironbark Forest.	
Myrtaceae	<i>Callistemon linearifolius</i>	Netted Bottle Brush	Dry sclerophyll forest on the coast, known from the Hornsby Plateau and within Ku-ring Gai N.P.	Unlikely
	<i>Eucalyptus nicholii</i>	Narrow-leaved Black Peppermint	New England Tablelands in grassy woodlands on infertile soils derived from granite or metasedimentary bedrock	Unlikely
	<i>Eucalyptus scoparia</i>	Wallangarra White Gum	Found in open eucalypt forest, woodland and heaths on well-drained granite/rhyolite hilltops, slopes and rocky outcrops, typically at high altitudes in 3 locations near Tenterfield and Bald Rock National Park in Qld. At lower elevations can occur in less rocky soils in damp situations.	Unlikely
	<i>Syzygium paniculatum</i>	Magenta Lilly Pilly	On the south coast the Magenta Lilly Pilly occurs on grey soils over sandstone, restricted mainly to remnant stands of littoral (coastal) rainforest. On the central coast Magenta Lilly Pilly occurs on gravels, sands, silts and clays in riverside gallery rainforests and remnant littoral rainforest communities.	Unlikely
Orchidaceae	<i>Pterostylis saxicola</i>	Sydney Plains Greenhood	Found growing in small pockets of shallow soil in depressions on sandstone rock shelves above cliff lines. The vegetation communities above the shelves where it occurs are sclerophyll forest or woodland on shale/sandstone transition soils or shale soils	Unlikely
Proteaceae	<i>Grevillea beadleana</i>	Beadle's Grevillea	Known from north-east NSW in open eucalypt forest with a shrubby understorey, usually found on steep granite slopes at high altitudes, although the population at Shannon Creek is at a lower elevation on sandstone.	Unlikely
Rhamnaceae	<i>Pomaderris prunifolia</i>	P. prunifolia in the Parramatta, Auburn, Strathfield and Bankstown Local Government Areas	Known from only three sites at Rydalmere, in Rookwood Cemetery and at The Crest of Bankstown. At Rydalmere it occurs along a road reserve near a creek, among grass species on sandstone. At	Unlikely

		Rookwood Cemetery it occurs in a small gully of degraded Cooks River / Castlereagh Ironbark Forest on shale soils	
Thymelaeaceae	<i>Pimelea curviflora</i> var. <i>curviflora</i>	<i>Pimelea curviflora</i> var. <i>curviflora</i> occurs on ridge tops and upper slopes in open forest and woodland on sandy soil derived from sandstone	Unlikely

Family	Scientific Name	Common Name	Habitat	Likelihood of Occurrence on Site
Amphibia				
Hylidae	<i>Litoria aurea</i>	Green and Golden Bell Frog	Permanent unshaded dams and lakes, often in association with well-developed fringing vegetation. Has be observed in degraded and polluted environments.	Unlikely, dams and ponded water is not present
Aves				
Accipitridae	<i>Hieraetus morphnoides</i>	Little Eagle	Occupies open eucalypt forest, woodland or open woodland. Sheoak or Acacia woodlands and riparian woodlands of interior NSW are also used. Nests in tall living trees within a remnant patch, where pairs build a large stick nest in winter	Unlikely
Accipitridae	<i>Haliaeetus leucogaster</i>	White-bellied Sea-Eagle	Habitats are characterised by the presence of large areas of open water including larger rivers, swamps, lakes, and the sea, Occurs at sites near the sea or sea-shore, such as around bays and inlets, beaches, reefs, lagoons, estuaries and mangroves; and at, or in the vicinity of freshwater swamps, lakes, reservoirs, billabongs and saltmarsh. Terrestrial habitats include coastal dunes, tidal flats, grassland, heathland, woodland, and forest (including rainforest). Breeding habitat consists of mature tall open forest, open forest, tall woodland, and swamp sclerophyll forest close to foraging habitat. Nest trees are typically large emergent eucalypts and often have emergent dead branches or large dead trees nearby which are used as 'guard roosts'. Nests are large structures built from sticks and lined with leaves or grass	Unlikely
Apodidae	<i>Hirundapus</i>	White-throated	Aerial over most types of habitat, often above wooded areas, including open forest and rainforest, may also fly between trees or in clearings, below the canopy, but they are	Unlikely

	<i>caudacutus</i>	Needletail	less commonly recorded flying above woodland. Commonly occur over heathland, but less often over treeless areas, such as grassland or swamps. In farmland they can occur above cleared pasture, plantations or remnant vegetation at the edge of paddocks. In coastal areas, they are sometimes seen flying over sandy beaches or mudflats, and often around coastal cliffs and other areas with prominent updraughts, such as ridges and sand-dunes. They are sometimes recorded above islands well out to sea	
Neosittidae	<i>Daphoenositta chrysoptera</i>	Varied Sittella	Inhabits eucalypt forests and woodlands, especially those containing rough-barked species and mature smooth-barked Igums with dead branches, mallee and Acacia woodland	Unlikely
Petroicidae	<i>Petroica boodang</i>	Scarlet Robin	Dry eucalypt forests and woodlands. The understorey is usually open and grassy with few scattered shrubs. This species lives in both mature and regrowth vegetation. It occasionally occurs in mallee or wet forest communities, or in wetlands and tea-tree swamps. Scarlet Robin habitat usually contains abundant logs and fallen timber: these are important components of its habitat.	Unlikely
Strigidae	<i>Ninox strenua</i>	Powerful Owl	Inhabits a range of vegetation types, from woodland and open sclerophyll forest to tall open wet forest and rainforest.	Unlikely
Tytonidae	<i>Tyto tenebricosa</i>	Sooty Owl	Occurs in rainforest, including dry rainforest, subtropical and warm temperate rainforest, as well as moist eucalypt forests. Roosts by day in the hollow of a tall forest tree or in heavy vegetation; hunts by night for small ground mammals or tree-dwelling mammals such as the Common Ringtail Possum (<i>Pseudocheirus peregrinus</i>) or Sugar Glider (<i>Petaurus breviceps</i>). Nests in very large tree-hollows	Unlikely
Mammalia				
Burramyidae	<i>Cercartetus nanus</i>	Eastern Pygmy-possum	Found in a broad range of habitats from rainforest through sclerophyll (including Box-Ironbark) forest and woodland to heath, but in most areas woodlands and heath appear to be preferred	Unlikely
Dasyuridae	<i>Dasyurus maculatus</i>	Spotted-tailed Quoll	a range of habitat types, including rainforest, open forest, woodland, coastal heath and inland riparian forest, from the sub-alpine zone to the coastline. Individual animals use hollow-bearing trees, fallen logs, small caves, rock outcrops and rocky-cliff faces as den sites.	Unlikely

Pteropoidae	<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox	Rainforest, tall sclerophyll forests and woodland	Possible
Emballonuridae	<i>Saccolaimus flaviventris</i>	Yellow-bellied Sheath-tail-bat	Roosts singly or in groups of up to six, in tree hollows and buildings; in treeless areas they are known to utilise mammal burrows	Possible
Molossidae	<i>Mormopterus norfolkensis</i>	Eastern Freetail-bat	The Eastern Freetail-bat is found in dry sclerophyll forest, woodland, swamp forests and mangrove forests east of the Great Dividing Range. Roost mainly in tree hollows but will also roost under bark or in man-made structures	Possible
Vespertillioidea	<i>Falsistrellus tasmaniensis</i>	Eastern False Pipistrelle	Prefers moist habitats, with trees taller than 20 m. Generally roosts in eucalypt hollows, but has also been found under loose bark on trees or in buildings.	Possible
	<i>Miniopterus schreibersii oceanensis</i>	Eastern Bentwing-bat	Caves old growth forest with tree hollows, known to utilise man-made stormwater management structures and disused buildings for roosting	Unlikely
	<i>Myotis macropus</i>	Southern Myotis	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	Possible
	<i>Scoteanax rueppellii</i>	Greater Broad-nosed Bat	Utilises a variety of habitats from woodland through to moist and dry eucalypt forest and rainforest, though it is most commonly found in tall wet forest. Although this species usually roosts in tree hollows, it has also been found in buildings.	Possible
Gastropoda				
Camaenidae	<i>Meridolum corneovirens</i>	Cumberland Plain Land Snail	Primarily inhabits Cumberland Plain Woodland (a critically endangered ecological community). This community is a grassy, open woodland with occasional dense patches of shrubs. It is also known from Shale Gravel Transition Forests, Castlereagh Swamp Woodlands and the margins of River-flat Eucalypt Forest, which are also listed communities. Lives under litter of bark, leaves and logs, or shelters in loose soil around grass clumps. Occasionally shelters under rubbish.	Unlikely
	<i>Pommerhelix duralensis</i>	Dural Woodland Snail	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. It favours sheltering under rocks or inside curled-up bark. It does not burrow nor climb. The species has also been observed resting in exposed areas, such as on exposed rock or leaf litter, however it will also shelter beneath leaves, rocks and light woody debris	Unlikely

Attachment C: Assessments of Significance

Grey Headed Flying Fox

Assessment of Significance (BC Act)

The Grey-headed Flying-fox is the largest Australian bat, with a head and body length of 23 - 29 cm. It has dark grey fur on the body, lighter grey fur on the head and a russet collar encircling the neck. The wing membranes are black and the wingspan can be up to 1 m. It can be distinguished from other flying-foxes by the leg fur, which extends to the ankle.

Grey-headed Flying-foxes are generally found within 200 km of the eastern coast of Australia, from Rockhampton in Queensland to Adelaide in South Australia. In times of natural resource shortages, they may be found in unusual locations.

This species occur in subtropical and temperate rainforests, tall sclerophyll forests and woodlands, heaths and swamps as well as urban gardens and cultivated fruit crops. Roosting camps are generally located within 20 km of a regular food source and are commonly found in gullies, close to water, in vegetation with a dense canopy. This species feeds on the nectar and pollen of native trees, in particular Eucalyptus, Melaleuca and Banksia, and fruits of rainforest trees and vines. Also forage in cultivated gardens and fruit crops.

The Grey-headed Flying-fox is listed as Vulnerable under the TSC Act and EPBC Act.

There are records of this species within 10 kilometres of the site.

There are two known flying fox breeding colonies within Parramatta LGA, one in Parramatta Park on the banks of the Parramatta River and the other in Ngunun Reserve in Granville.

(a) in the case of a threatened species, whether the action proposed is likely to have an adverse effect on the life cycle of the species such that a viable local population of the species is likely to be placed at risk of extinction

The canopy trees in Parramatta West are likely to provide foraging resources for this species, particularly when trees are in fruit or flower. Mature trees represent potential roosting habitat.

When compared to the locality, a relatively small number of native and exotic trees will be removed from the site. These trees represent a very small proportion of similar habitat available in the local area.

Works will only be undertaken during daylight hours only, so noise and construction activity will not impact use of the site as a night time foraging resource.

The works would remove a small number of trees that may provide foraging and roosting habitat for this highly mobile species. The works proposal is unlikely to have an adverse effect on the life cycle of this species such that a viable local population of this species is likely to be placed at risk of extinction.

(b) in the case of an endangered ecological community or critically endangered ecological community, whether the action proposed:

(i) is likely to have an adverse effect on the extent of the ecological community such that its local occurrence is likely to be placed at risk of extinction, or

This section is not applicable to the Grey Headed Flying Fox.

(ii) is likely to substantially and adversely modify the composition of the ecological community such that its local occurrence is likely to be placed at risk of extinction

This section is not applicable to the Grey Headed Flying Fox.

(c) in relation to the habitat of a threatened species, population or ecological community:

(i) the extent to which habitat is likely to be removed or modified as a result of the action proposed, and

38 trees will be removed from Burra Reserves around the eastern half of the perimeter with 56 being retained that would provide important feeding habitat.

The site is not a high quality native habitat as there is no remnant vegetation on the site and there is similar vegetation retained on the remainder of the school site and Burra Reserve.

(ii) whether an area of habitat is likely to become fragmented or isolated from other areas of habitat as a result of the proposed action, and

The local area has been heavily cleared and urbanised, with canopy trees representing fragmented habitat in the Parramatta West vicinity. The removal of the planted trees would not isolate any habitat for this highly mobile species.

(iii) the importance of the habitat to be removed, modified, fragmented or isolated to the long-term survival of the species, population or ecological community in the locality,

The trees to be removed from Burra reserve are not remnant native vegetation but do provide feeding habitat. There is no camp of breeding colony at the subject site. These trees to be removed represent only a very small proportion of comparable habitat in the local area and are not likely to be important to the long-term survival of the species in the locality.

(d) whether the proposed development or activity is likely to have an adverse effect on any declared area of outstanding biodiversity value (either directly or indirectly),

The area is not mapped as an area of outstanding biodiversity value.

(e) whether the action proposed constitutes or is part of a key threatening process or is likely to result in the operation of, or increase the impact of, a key threatening process.

Key Threatening Processes that are relevant for this species and project include:

Clearing of native vegetation – whilst the site is not remnant native vegetation, a number of native and exotic trees would be removed. No native vegetation per se would be affected and it is not considered to contribute to the operation of this key threatening process.

Conclusion

Based on consideration of this Assessment of Significance, the proposal is considered unlikely to result in a significant impact on the Grey Headed Flying Fox. Implementation of mitigation measures listed in the REF will further reduce the potential for adverse impacts.

Assessment of Significance (EPBC Act)

1. Are there any matters of national environmental significance located in the area of the proposed action

Grey-headed Flying Fox is a Matter Of National Environmental Significance, with the species being listed as a Vulnerable Species under the EPBC Act.

2. Considering the proposed action at its broadest scope (that is, considering all stages and components of the action, and all related activities and infrastructure), is there potential for impacts, including indirect impacts, on matters of national environmental significance?

Direct impacts include loss of foraging habitat through removal of trees. Potential indirect impacts are damage to trees through physical impact or compaction of soils.

3. Are there any proposed measures to avoid or reduce impacts on matters of national environmental significance (and if so, is the effectiveness of these measures certain enough to reduce the level of impact below the 'significant impact' threshold)?

Retention of the majority of trees would result in a reduction of impacts on the habitat value of the site for the species.

Disturbance from construction activity would be minimised through observing the tree protection measures.

The potential increase in paving could damage tree roots. This will be minimised through placing pavers at or above ground level.

4. Are any impacts of the proposed action on matters of national environmental significance likely to be significant impacts (important, notable, or of consequence, having regard to their context or intensity)?

Is the action is likely to have a significant impact on a vulnerable species	
Will it lead to a long-term decrease in the size of an important population of a species	No
Will it reduce the area of occupancy of an important population	No
Will it fragment an existing important population into two or more populations	No
Will it adversely affect habitat critical to the survival of a species	No
Will it disrupt the breeding cycle of an important population	No
Will it modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline	No
Will it result in invasive species that are harmful to a vulnerable species becoming established in the vulnerable species' habitat	No
Will it introduce disease that may cause the species to decline, or	No
Will it interfere substantially with the recovery of the species.	No

Any occurrence of Grey-headed flying fox on the site is considered to occur as part of a broader foraging activity throughout the area and the impact of loss of habitat is considered to be minor when compared to other available feeding habitat in the local area.

Conclusion

Based on consideration of this Assessment of Significance, the proposal is considered unlikely to result in a significant impact on the Grey Headed Flying Fox and referral for a decision by the Australian Government Environment Minister on whether assessment and approval is not required.

Microchiropteran bats

There is a small potential for trees present to be used as habitat by micro bats. There are no trees with large hollows, caves or structures such as bridges on the site that would be suitable for breeding. However, there are some trees that may contain bark crevices or small hollows that could be used for roosting by some species.

Due to the lack of remnant vegetation, no survey was undertaken, however assessments of significance are included below for all the microbat species that have previously been recorded within 10 kilometres of the site.

Falsistrelle tasmaniensis, Eastern False Pipistrelle

This species is listed as Vulnerable under the NSW BC Act.

The Eastern False Pipistrelle prefers moist habitats, with trees taller than 20 m. It generally roosts in eucalypt hollows, but has also been found under loose bark on trees or in buildings. They hunt beetles, moths, weevils and other flying insects above or just below the tree canopy. Hibernates in winter (OEH, undated).

Miniopterus schreibersii oceanensis, Eastern Bentwing-bat

This species is listed as Vulnerable under the NSW BC Act.

Preferred habitats for this species include rainforest, wet and dry sclerophyll forest, open woodland, Melaleuca forests and open grassland. The Eastern Bentwing-bat forages high in forested areas from just above canopy height to many times canopy height. In more open areas such as grasslands, flight may be within a few metres of the ground.

Eastern Bentwing-bats are primarily cave dwellers, but will also roost in man-made structures such as road culverts and mines (Churchill 1998).

Mormopterus norfolkensis, East Coast Freetail-bat

This species is listed as Vulnerable under the NSW BC Act.

The Eastern Freetail-bat utilises dry eucalypt forest and woodland on the coastal side of the Great Dividing Range. They show a preference for open spaces in woodland or forest, and are more active in the upper slopes of forest areas rather than in riparian zones. They also forage over large waterways. This species roosts in hollow trees (usually in hollow spouts), under exfoliating bark and in various man-made structures (Churchill 1998). Usually solitary but also recorded roosting communally, probably insectivorous (OEH, Undated).

Myotis macropus Southern Myotis

This species is listed as Vulnerable under the NSW BC Act.

The Southern Myotis forages over streams and watercourses feeding on fish and insects taken at the waters' surface. They 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. In NSW females have one young each year usually in November or December.

Saccolaimus flaviventris, Yellow-bellied Sheathtail-bat

This species is listed as Vulnerable under the NSW BC Act.

Yellow-bellied Sheathtail-bat is a wide-ranging species found across northern and eastern Australia. In the most southerly part of its range - most of Victoria, south-western NSW and adjacent South Australia - it is a rare visitor in late summer and autumn. It roosts singly or in groups of up to six, in tree hollows and buildings; in treeless areas they are known to utilise mammal burrows. Breeding has been recorded from December to mid-March, when a single young is born.

When foraging for insects, flies high and fast over the forest canopy, but lower in more open country. Forages in most habitats across its very wide range, with and without trees; appears to defend an aerial territory.

Scoteanax ruepellii, Greater Broad-nosed Bat

This species is listed as Vulnerable under the NSW BC Act.

This species is found mainly in the gullies and river systems that drain the Great Dividing Range. It extends to the coast over much of its range. It utilises a variety of habitats from woodland through to moist and dry eucalypt forest and rainforest, though it is most commonly

found in tall wet forest. Although this species usually roosts in tree hollows, it has also been found in buildings.

Forages after sunset, flying slowly and directly along creek and river corridors at an altitude of 3 - 6 m. Open woodland habitat and dry open forest suits the direct flight of this species as it searches for beetles and other large, slow-flying insects; this species has been known to eat other bat species.

Little is known of its reproductive cycle, however a single young is born in January; prior to birth, females congregate at maternity sites located in suitable trees, where they appear to exclude males during the birth and raising of the single young.

(a) in the case of a threatened species, whether the action proposed is likely to have an adverse effect on the life cycle of the species such that a viable local population of the species is likely to be placed at risk of extinction

The canopy trees may provide foraging resources for these bat species. Mature trees with bark fissures or small hollows represent potential roosting habitat.

A native and exotic trees will be removed from the site. These trees represent a small proportion of similar habitat available in the local area.

Works will only be undertaken during daylight hours only, so noise and construction activity will not impact use of the site as a night time foraging resource.

The works would remove a number of non-remnant trees that may provide foraging and roosting habitat for these highly mobile bat species. The works proposal is unlikely to have an adverse effect on the life cycle of these species such that a viable local population of any species is likely to be placed at risk of extinction.

(b) in the case of an endangered ecological community or critically endangered ecological community, whether the action proposed:

(i) is likely to have an adverse effect on the extent of the ecological community such that its local occurrence is likely to be placed at risk of extinction, or

This section is not applicable to the listed Micro-bats.

(ii) is likely to substantially and adversely modify the composition of the ecological community such that its local occurrence is likely to be placed at risk of extinction

This section is not applicable to the listed Micro-bats.

(c) in relation to the habitat of a threatened species, population or ecological community:

(i) the extent to which habitat is likely to be removed or modified as a result of the action proposed, and

A number of trees will be removed from Burra Reserve on the eastern part. This is a modification of a small area of potential roosting and foraging habitat that is not remnant vegetation and lower value.

(ii) whether an area of habitat is likely to become fragmented or isolated from other areas of habitat as a result of the proposed action, and

The local area has been heavily cleared and urbanised, with only fragmented connectivity of canopy trees remaining in the Parramatta West vicinity. The planted trees to be removed would not isolate any habitat for these highly mobile species.

(iii) the importance of the habitat to be removed, modified, fragmented or isolated to the long-term survival of the species, population or ecological community in the locality,

The trees to be removed are not remnant vegetation. No bridges, culverts or other structures suitable for breeding would be removed. The trees to be removed represent only a small proportion of habitat in the local area and are not likely to be important to the long-term survival of the species in the locality.

(d) whether the action proposed is likely to have an adverse effect on an area of outstanding biodiversity value (either directly or indirectly),

The site is not an area of outstanding biodiversity value.

(e) whether the action proposed constitutes or is part of a key threatening process or is likely to result in the operation of, or increase the impact of, a key threatening process.

Key Threatening Processes that are relevant for this species and project include:

Clearing of native vegetation – whilst the site is not remnant native vegetation, a number of native and exotic trees would be removed. No native vegetation per se would be affected and it is not considered to contribute to the operation of this key threatening process.

Conclusion

Based on consideration of this Assessment of Significance, the proposal is considered unlikely to result in a significant impact on any threatened micro bat species. Implementation of mitigation measures listed in the REF will further reduce the potential for adverse impacts.

Attachment D: Biodiversity Values Map



Biodiversity values map and subject site