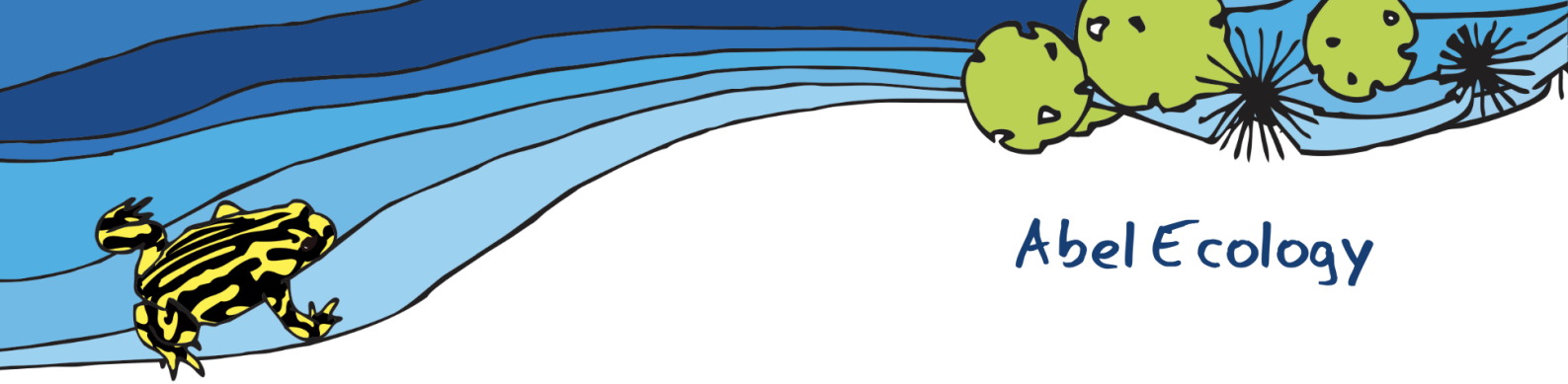




Abel Ecology

Biodiversity Development Assessment Report Waiver
(BDAR Waiver) Request

Proposed construction of a mixed-use development:
150 x apartments including 10 x affordable housing units
Ground floor retail

100 Edinburgh Road, Castlecrag NSW 2068
Lot 1 DP 43691, Lot11 DP611594

Prepared for:	NSW Housing Corporation Pty Ltd
Report No:	AE25 2851 BDARW ISS 1
Prepared by:	Abel Ecology
Date:	15 September 2025



Disclaimer

This report has been prepared in accordance with the scope of services described in agreement between Abel Ecology and the Client.

In preparing this report, Abel Ecology has relied upon data, surveys and site inspection results taken at or under the particular time and or conditions specified herein. Abel Ecology has also relied on certain verbal information and documentation provided by the Client and/or third parties, but did not attempt to independently verify the accuracy or completeness of that information. To the extent that the conclusions and recommendations in this report are based in whole or in part on such information, they are contingent on its validity. Abel Ecology assumes no responsibility for any consequences arising from any information or condition that was concealed, withheld, misrepresented, or otherwise not fully disclosed or available to Abel Ecology.

The findings contained in this report are the result of discrete/specific methods used in accordance with normal practices and standards. To the best of our knowledge, they represent a reasonable interpretation of the general condition of the site in question. Under no circumstances, however, can it be considered that these findings represent the actual state of the site/sites at all points.

Any representation, statement, opinion or advice, expressed or implied in this publication is made in good faith but on the basis that Abel Ecology, its agents and employees are not liable (whether by reason of negligence, lack of care or otherwise) to any person for any damage or loss whatsoever, which has occurred or may occur in relation to that person taking or not taking (as the case may be) action in respect of any representation, statement, or advice referred to above. Any findings, conclusions or recommendations only apply to the aforementioned circumstances and no greater reliance should be assumed or drawn by the Client.

Furthermore, this report has been prepared solely for use by the Client. Abel Ecology accepts no responsibility for its use by other parties.

Document History

Report	Version	Prepared by	Technical Review by	Proofread by	Submission	
					Method	Date
Report	Draft A	Rohan Chretien Nicholas Tong (BAAS22012) 	Nicholas Tong	Ella Trueman	Dropbox	22 August 2025
Report	Issue 1	Rohan Chretien Nicholas Tong (BAAS22012) 	Nicholas Tong	Stacey Burn	Dropbox	11 September 2025



Table of Contents

1.	Introduction	4
2.	The Project.....	14
3.	BDAR waiver request information.....	15
4.	Conclusion	21
5.	Bibliography	22
6.	Company Profile.....	23

Table of Figures

Figure 1. The locality of 100 Edinburgh Road, Castlecrag NSW 2068.	5
Figure 2. The subject site of 100 Edinburgh Road, Castlecrag NSW 2068 on 28 May 2025.....	6
Figure 3. Site Plan of 100 Edinburgh Road, Castlecrag NSW 2068.	7
Figure 4. Tree Removal Plan of 100 Edinburgh Road for DA-2024/13, Castlecrag NSW 2068.	8
Figure 5. Amended AIA Tree Schedule for DA-2024/13, 100 Edinburgh Rd, Castlecrag NSW 2068.	14

Table of Tables

Table 1. BDAR Waiver Request information requirements	15
Table 2. Impacts of the proposed development on biodiversity values.....	17



1. Introduction

NSW Housing Corporation Pty Ltd (the Proponent) proposes to construct a Construction of a mixed-use development: approximately 150 x apartments including 10 x affordable housing units and Ground floor retail (the Project) at 100 Edinburgh Road, Castlecrag NSW 2068 (the subject site) (Figure 1 & Figure 2). The Site Plan is shown in Figure 3.

The Project is classified as HDA Declared Site.

The site has been cleared of infrastructure under existing development consent DA 2024/17. The vegetation on site that is required to be cleared will be done under the development consent DA 2024/13.

No field assessment was undertaken as the subject site is to be entirely cleared of habitat for microbats under DA-2024/17.

This BDAR Waiver Request is to be submitted to the Biodiversity, Conservation and Science Group of the NSW Department of Climate Change, Energy, the Environment and Water.

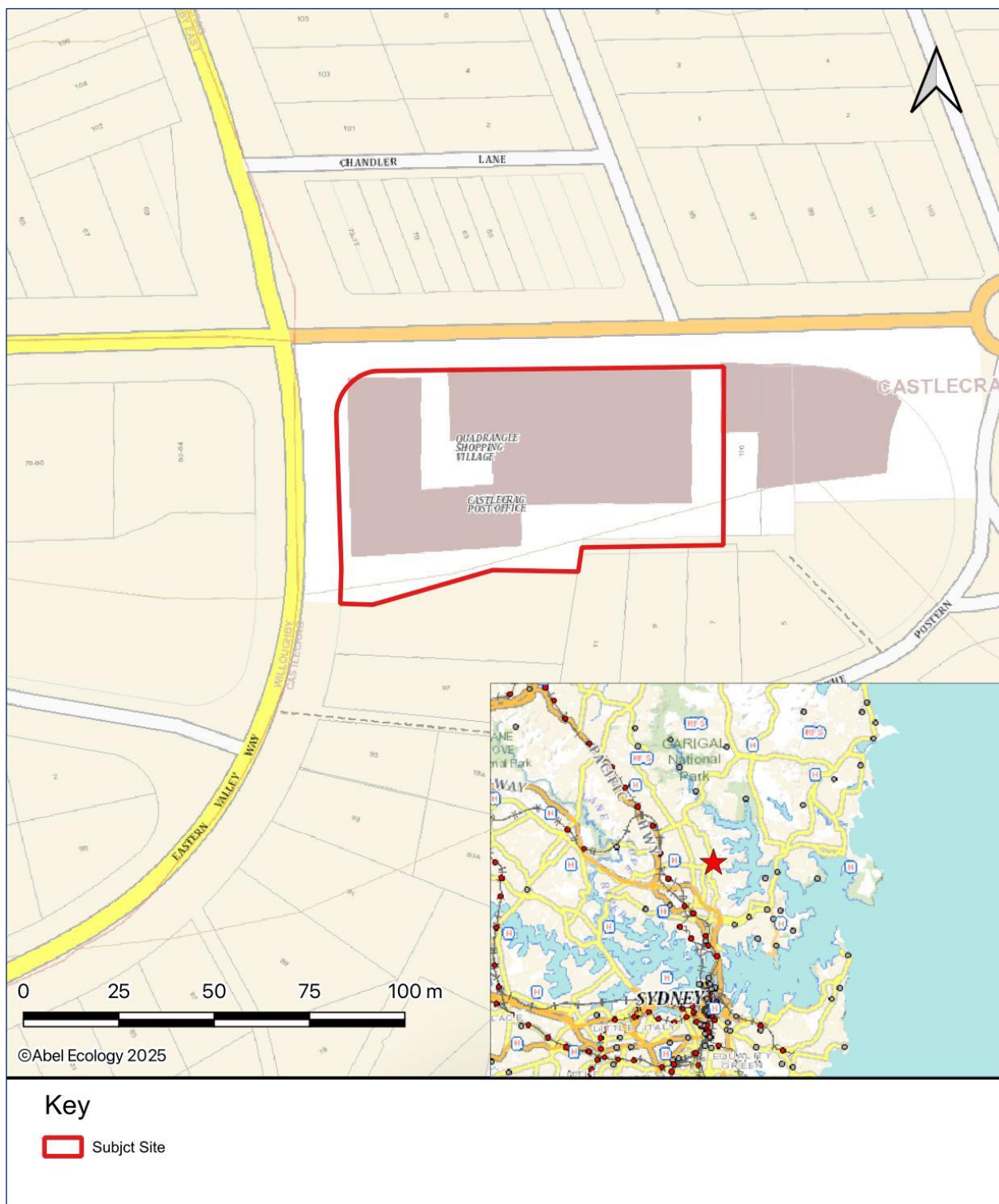


Figure 1. The locality of 100 Edinburgh Road, Castlecrag NSW 2068.

Source: (NSW Spatial Services, 2025)

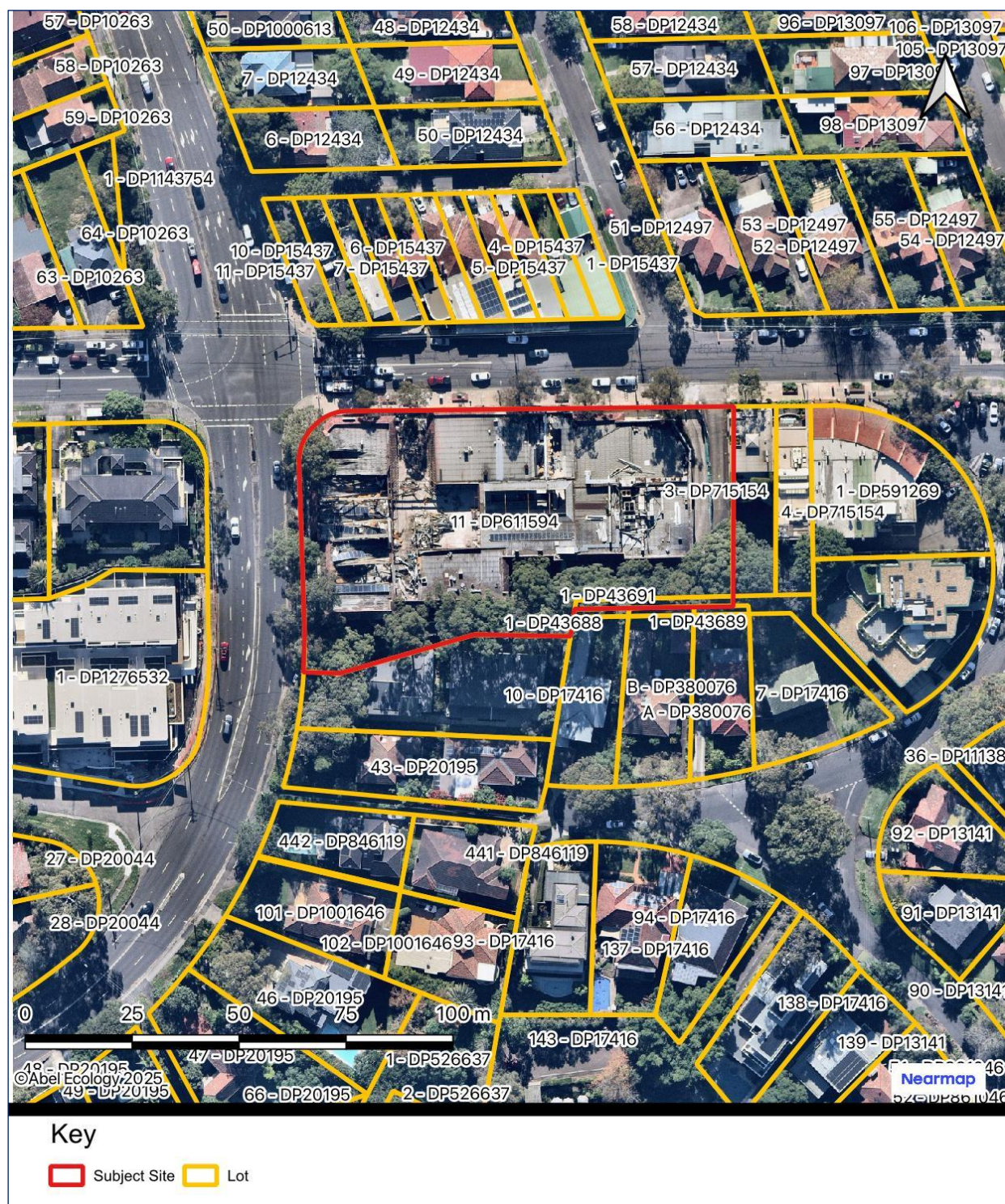


Figure 2. The subject site of 100 Edinburgh Road, Castlecrag NSW 2068 on 28 May 2025.

Source: (Nearmap, 2024)



Source: fjcstudio, 05 September 2025

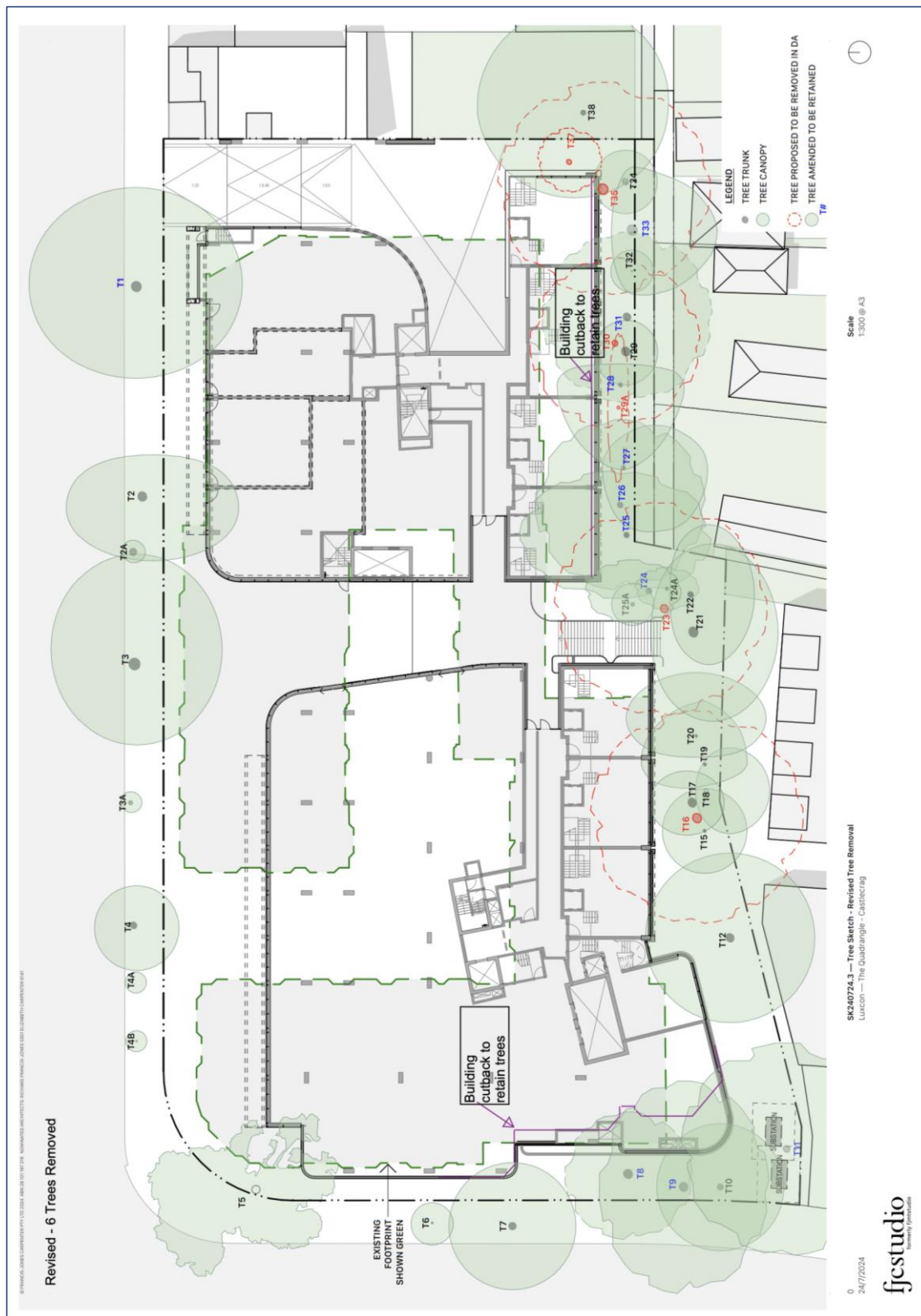


Figure 4. Tree Removal Plan of 100 Edinburgh Road for DA-2024/13, Castlecrag NSW 2068.

Source: Tree Wise Men, 03 September 2024



Prepared for: Greenciff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECRAG

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	@SIG RATING	@RETENTION INDEX	RECOMMENDATION	COMMENTS
1	Wallangarra White Gum, <i>Eucalyptus scoparia</i>	78	18	N10, S10, E10, W8	M	F	F	3.3	9.4	M	2	B	R+	Retain. Introduced native species. Located on Council managed land. High percentage deadwood present, epicormic shoots and tip dieback noted. Fire Booster to be moved beyond TPZ. Carpark to be tunnelled in rock beneath notional TPZ. Minor canopy pruning required. New-for-old verge pavement. Existing Drive footprint reduced within TPZ. Actual root disturbance expected is negligible.
2	Wallangarra White Gum, <i>Eucalyptus scoparia</i>	48	16	N8, S8, E4, W6	M	F	F	2.7	5.8	M	2	B	R+	Retain. Introduced native species. Located on Council managed land. Deadwood to 150mm diameter noted. Carpark to be tunnelled in rock beneath notional TPZ. Minor canopy pruning required. New-for-old verge pavement. Actual root disturbance expected is negligible.
2A	Scribbly Gum, <i>Eucalyptus racemosa</i>	11	6	1	IM	G	G	1.5	2.0	M	2	B	R	Retain. Locally native species. Located on Council managed land. Recently planted specimen. New-for-old verge pavement. Actual root disturbance expected is negligible. No canopy pruning required.
3	Scribbly Gum, <i>Eucalyptus racemosa</i>	70	16	N8, S8, E10, W8	M	F	F	3.1	8.4	M	2	B	R+	Retain. Introduced native species. Located on Council managed land. New-for-old verge pavement. Actual root disturbance expected is negligible. Minor canopy pruning required.
3A	Scribbly Gum, <i>Eucalyptus racemosa</i>	4	2	1	IM	G	P	1.5	2.0	S	3	C	R	Retain. Locally native species. Located on Council managed land. Recently planted specimen, socketing in ground. New-for-old verge pavement. Actual root disturbance expected is negligible. No canopy pruning required.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

1 of 12

Prepared for: Greenciff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECRAG

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	@SIG RATING	@RETENTION INDEX	RECOMMENDATION	COMMENTS
4	Broad-leaved Scribbly Gum, <i>Eucalyptus haemastoma</i>	46	16	4	M	G	G	2.7	5.5	M	1	A	R+	Retain. Locally native species. Located on Council managed land. Carpark to be tunnelled in rock beneath notional TPZ. No canopy pruning required. New-for-old verge pavement. Actual root disturbance expected is negligible.
4A	Scribbly Gum, <i>Eucalyptus racemosa</i>	10	3	1	IM	G	G	1.5	2.0	S	3	C	R	Retain. Locally native species. Located on Council managed land. Recently planted specimen. New-for-old verge pavement. Actual root disturbance expected is negligible. No canopy pruning required.
4B	Scribbly Gum, <i>Eucalyptus racemosa</i>	21	3	1	IM	G	G	2.0	2.6	S	3	C	R	Retain. Locally native species. Located on Council managed land. Recently planted specimen. New-for-old verge pavement. Actual root disturbance expected is negligible. No canopy pruning required.
5	Spotted Gum, <i>Corymbia maculata</i>	74	22	10	M	G	G	3.2	8.9	M	1	A	R+	Retain. Introduced native species. Located on partially on Council managed land and the subject site. Tree appears to be lifting footpath. Minor canopy pruning required. Actual root disturbance expected is negligible as proposed Ground and Basement construction matches existing Carpark building.
6	Scribbly Gum, <i>Eucalyptus racemosa</i>	18	10	2	SM	G	G	1.9	2.2	M	1	A	R+	Retain. Locally native species. Located on Council managed land. Tree appears to be lifting footpath. Heavily browsed by fauna, scratches up stem noted. Actual root disturbance expected is negligible. No canopy pruning required.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

2 of 12



Prepared for: Greycliff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECRAG

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	@SIG RATING	@RETENTION INDEX	RECOMMENDATION	COMMENTS
7	Wallangarra White Gum, <i>Eucalyptus scoparia</i>	64	18	6	M	F	F	2.9	7.7	M	2	B	R+	Retain. Introduced native species. Located on Council managed land. Tree appears to be lifting footpath. High percentage of deadwood, to 80mm in diameter. Epicormic growth noted. Actual root disturbance expected is minor given existing timber retaining walls and Carpark pavement coinciding with proposed Basement 1 excavation. Minor canopy pruning required.
8	Spotted Gum, <i>Corymbia maculata</i>	47, 41	22	6	M	G	G	2.9	7.5	M	1	A	Rm	Remove. Introduced native species. Located within the subject site. Located close to the existing Building. Relocated Substation (and existing) within SRZ. Major TPZ encroachment associated with excavation for Basements.
9	Wallangarra White Gum, <i>Eucalyptus scoparia</i>	68	22	N6, S6, E10, W12	M	G	F	3.0	8.2	M	1	A	Rm	Remove. Introduced native species. Located within the subject site. Thin canopy, deadwood and epicormic growth present. Relocated Substation (and existing) within SRZ. Major TPZ encroachment associated with excavation for Basements.
10	Wallangarra White Gum, <i>Eucalyptus scoparia</i>	43	18	6	M	F	F	2.5	5.2	M	2	B	R+	Retain. Introduced native species. Located within the subject site. Thin canopy, deadwood and epicormic growth present. Relocated Substation within TPZ. Minor TPZ encroachment associated with Basement excavation. Moderate canopy pruning required adjacent Building.
11	Tallowwood, <i>Eucalyptus microcorys</i>	69	22	10	M	G	G	3.1	8.3	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Deadwood to 30mm in diameter noted. Minor TPZ encroachment from Basement 1 excavation. Removal of existing bitumen paving will benefit tree. Minor canopy pruning required.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

3 of 12

Prepared for: Greycliff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECRAG

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	@SIG RATING	@RETENTION INDEX	RECOMMENDATION	COMMENTS
12	Flooded Gum, <i>Eucalyptus grandis</i>	55	24	N12, S12, E8, W8	M	G	G	2.8	6.6	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Deadwood to 30mm in diameter noted. Deck to be suspended within TPZ to avoid Basement 1 excavation. Minor TPZ encroachment from Basement 1 excavation. Removal of existing bitumen paving will benefit tree. Minor canopy pruning required.
13	Previously Removed											PR	PR	Previously Removed.
14	Previously Removed											PR	PR	Previously Removed.
15	Tallowwood, <i>Eucalyptus microcorys</i>	40	18	4	M	G	G	2.7	4.8	M	2	B	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment due to ex. fencing. Suppressed specimen. Tree will benefit from removal of Tree 16, bitumen pavement and existing structures within TPZ. Deck to be suspended within TPZ to avoid Basement 1 excavation. Actual root disturbance expected is negligible. Minor canopy pruning required.
16	Sydney Blue Gum, <i>Eucalyptus saligna</i>	84	25	10	M	F	F	3.2	10.1	M	2	B	Rm	Remove. Locally native species. Located within the subject site. Restricted assessment, access not available at time of assessment. 3-4 x 150mm in diameter deadwood noted in canopy. Canopy dieback. Root spread to north observed within ex. bitumen paving. Major TPZ encroachment associated with Basement 1 excavation. Actual root disturbance expected is negligible. Moderate canopy pruning required.
17	Tallowwood, <i>Eucalyptus microcorys</i>	24	16	N4, S3, E3, W3	M	F	G	2.2	2.9	M	2	B	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Suppressed specimen. Tree will benefit from removal of Tree 16 and bitumen pavement within TPZ. Deck to be suspended within TPZ to avoid Basement 1 excavation. Actual root disturbance expected is negligible. Minor canopy pruning required.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

4 of 12



Prepared for: Greycliff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECrag

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	CSIG RATING	SRETENTION INDEX	RECOMMENDATION	COMMENTS
18	Tallowwood, <i>Eucalyptus microcorys</i>	30	18	N1, S6, E3, W3	M	G	G	2.3	3.6	M	2	B	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Suppressed specimen. Tree will benefit from removal of Tree 16 and bitumen pavement within TPZ. Deck to be suspended within TPZ to avoid Basement 1 excavation. Actual root disturbance expected is negligible. No canopy pruning required.
19	Tallowwood, <i>Eucalyptus microcorys</i>	40	20	N5, S4, E6, W2	M	G	G	2.6	4.8	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Tree will benefit from removal of Tree 16 and ex. bitumen pavement and Building within TPZ. Deck to be suspended within TPZ to avoid Basement 1 excavation. Actual root disturbance expected is negligible. Minor canopy pruning required.
20	Tallowwood, <i>Eucalyptus microcorys</i>	35	22	N6, S6, E8, W2	M	G	G	2.5	4.2	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Tree will benefit from removal of ex. bitumen pavement and buildings within TPZ. Deck to be suspended within TPZ to avoid Basement 1 excavation. Actual root disturbance expected is negligible. Minor canopy pruning required.
21	Tallowwood, <i>Eucalyptus microcorys</i>	35, 40	22	N4, S8, E8, W8	M	G	G	2.9	6.4	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Minor bark inclusion noted in main codominant stems. Tree will benefit from removal of ex. bitumen pavement, brick wall and buildings within TPZ. Deck to be suspended within TPZ to avoid Basement 1 excavation. Actual root disturbance expected is negligible. No canopy pruning required.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

5 of 12

Prepared for: Greycliff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECrag

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	CSIG RATING	SRETENTION INDEX	RECOMMENDATION	COMMENTS
22	Tallowwood, <i>Eucalyptus microcorys</i>	46	22	N2, S6, E6, W6	M	G	G	2.5	5.5	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Deck to be locally raised within TPZ to avoid Basement 1 excavation. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. No canopy pruning required.
23	Tallowwood, <i>Eucalyptus microcorys</i>	25, 31	24	N12, S0, E0, W8	M	G	F	2.8	4.8	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Secondary stem (at 6m AGL) low over existing wall/carpark. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. Moderate canopy pruning required however canopy concentrated between buildings.
24	Tallowwood, <i>Eucalyptus microcorys</i>	39	20	N6, S3, E3, W3	M	F	P	2.5	4.7	S	2	B	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Mainly epicormic growth, die-back noted. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. Minor canopy pruning required however canopy concentrated between buildings.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

6 of 12



Prepared for: Greenciff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECRAG

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	CSIG RATING	SRETENTION INDEX	RECOMMENDATION	COMMENTS
24A	Turpentine, <i>Syncarpia glomulifera</i>	15, 6	10	N3, S3, E2, W2	SM	G	G	1.6	2.0	M	2	M	R+	Retain. Locally native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Tree inaccurately plotted on Site Demolition Plan. Tree actually located 1m W of Tree 23. Other 5m tall Tallowwood in that location to be retained. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. No canopy pruning required.
25	Tallowwood, <i>Eucalyptus microcorys</i>	45	24	N10, S8, E8, W6	M	G	G	2.9	5.4	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. Pruning of entire northern-most trunk required. This trunk is storm damaged in any event.
25A	Turpentine, <i>Syncarpia glomulifera</i>	8	9	N1, S2, E2, W1	IM	G	G	1.5	2.0	M	2	B	R+	Retain. Locally native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Tree inaccurately plotted on Site Demolition Plan. Tree actually located 3m W of Tree 25. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. No canopy pruning required.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

7 of 12

Prepared for: Greenciff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECRAG

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	CSIG RATING	SRETENTION INDEX	RECOMMENDATION	COMMENTS
26	Tallowwood, <i>Eucalyptus microcorys</i>	72	24	8	M	G	G	3.1	8.6	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. Moderate northern-most canopy pruning required.
27	Southern Mahogany, <i>Eucalyptus botryoides</i>	32	20	N2, S8, E6, W2	M	G	F	2.3	3.8	M	2	B	R+	Retain. Locally native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Thin canopy, deadwood noted. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. Minor northern-most canopy pruning required.
28	Sydney Red Gum, <i>Angophora costata</i>	39, 25	22	N6, S6, E2, W8	M	G	G	3.2	5.6	M	1	A	R+	Retain. Locally native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Main stem 'propped' on existing wall. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. Northern-most trunk contacting wall to be pruned at trunk union. Southern-most trunk to be retained.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

8 of 12



Prepared for: Greycliff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECRAG

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	SSIG RATING	GREENTATION INDEX	RECOMMENDATION	COMMENTS
29	Turpentine, <i>Syncarpia glomulifera</i>	16	12	3	SM	G	G	1.9	2.0	M	2	B	R+	Retain. Locally native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Tree inaccurately plotted on Site Demolition Plan. Tree actually located 1m E of Tree 28. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. No canopy pruning required.
29A	Weeping Lilly Pilly, <i>Waterhousea floribunda</i> (Group)	10	7	1	IM	G	G	1.5	2.0	M	2	B	Rm	Remove. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Row of young shrubs between Trees 26 and 29 which need to be removed to allow for new landscape.
30	Sydney Red Gum, <i>Angophora costata</i>	35	18	N4, S8, E8, W0	M	G	G	2.5	4.2	M	2	B	Rm	Remove. Locally native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Canopy orientated to the west (phototropic), wound on stem @ 6m AGL. Treism Condition rating should be Poor not Good. Stem wound at 6m is significant justifying tree removal.
31	Tallowwood, <i>Eucalyptus microcorys</i>	35	20	8	M	G	G	2.4	4.2	M	2	M	R+	Retain. Introduced native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. Moderate canopy pruning to north required.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

9 of 12

Prepared for: Greycliff Castlecrag Pty Ltd

AMENDED AIA Tree Schedule -
100 Edinburgh Rd, CASTLECRAG

1/09/2024

TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	SSIG RATING	GREENTATION INDEX	RECOMMENDATION	COMMENTS
32	Turpentine, <i>Syncarpia glomulifera</i>	17	12	2	SM	G	F	2.0	2.1	M	2	B	R+	Retain. Locally native species. Located within the subject site. Restricted assessment, access not available at time of assessment. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. No canopy pruning to required.
33	Tallowwood, <i>Eucalyptus microcorys</i>	60	24	N2, S8, E8, W6	M	G	G	2.8	7.2	M	1	A	R+	Retain. Introduced native species. Located within the subject site. Restricted growth area/soil volume. Tree located south of ex. stairs and concrete Driveway confining root spread north. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. brick fence, stairs and conc. Driveway as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of ex. bitumen pavement and brick wall within TPZ. Minor canopy pruning to required. The N2 canopy spread recording by Treism is inaccurate. There is one major branch to north that needs to be pruned.
34	Brushbox, <i>Lophotemon confertus</i>	28	16	3	SM	G	G	2.2	3.4	M	2	B	R+	Retain. Introduced native species. Located within the subject site. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. stairs and concrete Driveway as confirmed by root mapping. Actual root disturbance expected is negligible. Tree will benefit from removal of Tree 35 and ex. concrete Driveway within TPZ. Minor canopy pruning required.

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

10 of 12



Prepared for: Greycliff Castlecrag Pty Ltd							AMENDED AIA Tree Schedule - 100 Edinburgh Rd, CASTLECrag							1/09/2024	
TREE No.	COMMON NAME/ GENUS SPECIES	DBH (cm)	HEIGHT (m)	CANOPY RADIUS (m)	AGE CLASS	VIGOUR	CONDITION	SRZ RADIUS (m)	TPZ RADIUS (m)	ULE	@SIG RATING	@RETENTION INDEX	RECOMMENDATION	COMMENTS	
35	Tallowood, <i>Eucalyptus microcorys</i>	74	26	N15, S8, E10, W10	M	G	G	3.1	8.9	M	1	A	Rm	Remove. Introduced native species. Located within the subject site. Low branching noted. Trunk located within Basement 1 building footprint.	
36	Turpentine, <i>Syncarpia glomulifera</i>		8							Rm	4	D	Rm	Remove. Dead tree.	
37	Turpentine, <i>Syncarpia glomulifera</i>	26, 25	10	N4, S1, E4, W2	M	G	G	2.4	4.3	M	2	B	Rm	Remove. Locally native species. Located within the subject site. Included stem @ 0.1m AGL. SRZ excavation.	
38	Sydney Red Gum, <i>Angophora costata</i>	75	18	N10, S10, E8, W8	M	G	G	3.1	9.0	M	1	A	R+	Retain. Introduced native species. Located on an adjoining property. Deck to be locally raised within TPZ to avoid Basement 1 excavation. No actual root spread likely beyond ex. concrete Driveway. Actual root disturbance expected is negligible. Tree will benefit from removal of Trees 36 and 37 and ex. concrete Driveway within TPZ. No canopy pruning required.	
45															

©Tree Wise Men® Australia Pty Ltd

2798(L)TABAMENDED (as at 1/09/2024)

11 of 12

Figure 5. Amended AIA Tree Schedule for DA-2024/13, 100 Edinburgh Rd, Castlecrag NSW 2068.

Source: Tree Wise Men, 09 September 2024

2. The Project

The proposal will seek to deliver an 11-story development with 150 dwellings as part of a mixed-use development. This will also include 10 affordable housing units. It will also include retail services including a supermarket, residential units, basement car parking, with associated landscaping.

Figure 3 shows the Site Plan.



3. BDAR waiver request information

This section provides the information detailed in Tables 1 and 2 of The Department of Planning, Industry & Environment’s guideline ‘How to apply for a biodiversity development assessment report waiver for a Major Project Application’.

Table 1. BDAR Waiver Request information requirements

Proponent	Proponent: NSW Housing Corporation Pty Ltd
Site details	Mixed use development with affordable housing – 100 Edinburgh Road, Castlecrag NSW 2068 - Application Number: SSD-90134958 - Current Status: Prepare EIS
Scientist Name Ecological qualifications of Scientist completing Table 2	Nicholas Tong BSc (Biology), MPhil (Ecology), Cert. III CLM, MECA NSW, BAM Accredited Assessor (BAAS22012), 8 years ecological consulting experience.
Site details	The subject site (Figure 1 & Figure 2) is located in the suburb of Castlecrag, The site is located on a prominent corner of Edinburgh Road and Eastern Valley Way. The site is located immediately to the west of the Castlecrag Conservation area. The site comprises of lots as follows: • 100 Edinburgh Road, Castlecrag NSW 2068 – Lot 1 DP 43691, Lot11 DP611594 The subject site is within the Willoughby City Council area. The land is zoned E1 Local Centre and is near to land zoned C4 Environmental Living, and R2-R3 Low/Mid Density Residential
Existing Development Applications	The site has two existing development consent: DA 2024/17: Demolition of existing shopping centre. Status: Under determination. DA 2024/13: Proposed construction of a mixed-use development. Status: Under determination.

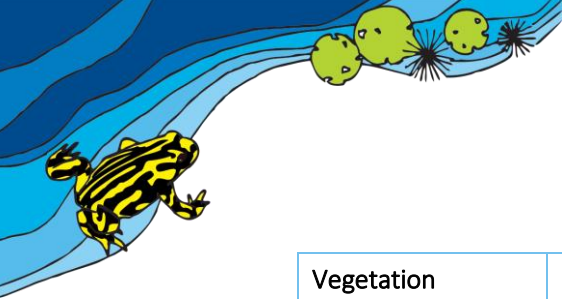


Description of existing development site, i.e., the area of land that is subject to the proposed development application	Pre-existing buildings and structures on the site are to be demolished under DA 2024/17. Detailed descriptions of the vegetation on the subject site can be found in the responses to 1.4(b) BC Regulation, 1.5(2)(a) BC Act 2016, and 1.5(2)(b) BC Act 2016, in Table 2 below.
Site Map	Location map: Refer to Figure 1. Aerial image map: Refer to Figure 2.
Proposed development	A mixed-use development comprising commercial/retail area and residential housing, including affordable housing. Figure 3 shows the Site Plan.
Impacts on biodiversity values	The subject site does not contain any land included on the Biodiversity Values Map (NSW DCCEEW, 2025). Refer to Table 2 for an assessment of potential impacts on Biodiversity Values.



Table 2. Impacts of the proposed development on biodiversity values

Biodiversity Value	Meaning	Relevance (✓ or N/A)	Potential Impacts	
			Applicant comment/justification	BCS comment
Vegetation abundance 1.4(b) BC Regulation	Occurrence and abundance of vegetation at a particular site.	✓	Some vegetation is to be cleared under DA-2024/13 (Figure 2). However the trees that remain are not to be removed as per demolitioin plan in previous DA (Figure 4). Furthermore, there are no threatened species or ecological communities on site. The proposed landscape plans will likely improve urban green space with multiple 'green areas' (Figure 3). The current consent conditions state that no trees to be removed without approval and tree protection management measures in place during construction. Overall, the proposal would not impact vegetation to a greater extent than that approved under DA-2024/13. The vegetation that will be retained is a mix of planted native species including; Wallangarra White Gum (<i>Eucalyptus scoparia</i>), Scribbly Gum (<i>Eucalyptus racemosa</i>), Spotted gum (<i>Corymbia maculata</i>), Turpentine (<i>Syncarpia glomulifera</i>) and Tallowwood (<i>Eucalyptus microcorys</i>) Negligible additional shading impact.	



Vegetation integrity 1.5(2)(a) BC Act 2016	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.	✓	The vegetation within the subject site has been heavily altered from a natural state. All strata of native vegetation have been historically cleared and the site has been regraded and contained planted vegetation. Negligible additional shading impact.	
Habitat suitability 1.5(2)(b) BC Act 2016	Degree to which the habitat needs of threatened species are present at a particular site.	✓	The subject site contains planted gardens, which provide minimal foraging habitat for threatened species. No hollows, nests or other habitat features were noted on the site. No additional vegetation clearing is proposed. Negligible impact.	
Threatened species abundance 1.4(a) BC Regulation	Occurrence and abundance of threatened species or threatened ecological communities, or	✓	Threatened species and Threatened Ecological Communities do not occur at the subject site. The subject site contains foraging habitat for threatened species The vegetation on the subject site does not comprise any Plant Community Type or Threatened Ecological Community.	



	their habitat, at a particular site.		No additional vegetation clearing is proposed. Negligible impact.	
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.	✓	The subject site is surrounded by residential development and provides very limited habitat connectivity. No additional vegetation clearing is proposed. Negligible impact.	
Threatened species movement 1.4(d) BC Regulation	Degree to which a particular site contributes to the movement of threatened species to maintain their life cycle.	✓	The subject site is surrounded by residential development and is unlikely to contribute to the movement of threatened species. No additional vegetation clearing is proposed. Negligible impact.	
Flight path integrity 1.4(e) BC Regulation	Degree to which the flight paths of protected animals over a particular	✓	The Project would be 11 storeys in height and is located within a residential area, close to the commercial centre of Castlecrag.	



	site are free from interference.		The Project is unlikely to interfere with the flight paths of protected animals. Negligible impact.	
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.	✓	There are no water bodies or water courses within the vicinity of the Project site. The Project will be constructed in accordance with a development approval, which would contain appropriate sediment and erosion controls. The Project is not expected to have any significant impact on water quality, water bodies or hydrological processes. Negligible impact.	



4. Conclusion

A BDAR is not considered necessary for the Project for the following reasons:

- All demolition works, and vegetation clearing are to be undertaken under DA 2024/17 and DA 2024/13.
- No threatened species or threatened ecological communities have been identified within the subject site.
- The site is not part of a recognised movement corridor between breeding grounds, foraging grounds, or other habitats important for the lifecycle of species such as staging points for migration.
- Flight path integrity is unlikely to be impacted.
- There are no waterbodies or watercourses within the vicinity of the site. Water quality, water bodies and hydrological processes are unlikely to be impacted by the proposed development.



5. Bibliography

ICSM, 2025. *Elvis - Elevation and Depth - Foundation Spatial Data.* [Online]
Available at: <https://elevation.fsd.org.au/>

Nearmap, 2024. *Nearmap.* [Online]
Available at: www.nearmap.com

NSW DCCEEW, 2025. *Biodiversity Values Map.* [Online]
Available at: <https://datasets.seed.nsw.gov.au/dataset/biodiversity-values-map>

NSW Spatial Services, 2025. *NSW Base Map.* [Online]
Available at: <https://datasets.seed.nsw.gov.au/dataset/nsw-basemap>



6. Company Profile

Abel Ecology has been in the biodiversity consulting business since 1991, starting in the Sydney Region, and progressively more state-wide in New South Wales since 1998, and now also in Victoria. During this time extensive expertise has been gained with regard to Master Planning, Environmental Impact assessments including flora and fauna, bushfire reports, Vegetation Management Plans, Management of threatened species, Review of Environmental Factors, Species Impact Statements, Biodiversity Development Assessment Reports and as Expert Witness in the Land and Environment Court. We have done consultancy work for industrial and commercial developments, golf courses, civil engineering projects, tourist developments as well as residential and rural projects. This process has also generated many connections with relevant government departments and city councils in NSW. Our team consists of eight scientists and four administrative staff, plus casual assistants as required.

Licences

NPWS s132C Scientific licence number is SL100780.

NPWS GIS data licence number is CON95034.

NSW Dept of Primary Industries Secretary's Animal Care and Ethics Committee Approval: 18/575.

NSW Dept of Primary Industries Animal Research Authority. Accreditation No: 84207.

The Consultancy Team

Dr Danny Wotherspoon

Principal

BSc, DipEd, MA, PhD, Grad Dip Bushfire Protection,
MECA NSW, MEPLA, MNELA, MESA, MEIANZ, White card.

Danny has practised as an ecological and bushfire consultant since 1991. He is a consulting ecologist to private developers, State Government agencies and various City Councils on a regular basis, for development applications, government projects, and as expert witness in the NSW Land and Environment Court.

Danny's PhD researched fragmented vegetation and fauna habitat use. He has special expertise in fauna habitat use. Danny has presented invited papers at international conferences since 2001 in Australia, China, South Africa, Sri Lanka and Israel on his PhD and other research, including golf course habitat management. Danny's scientific papers have been published in both international and Australian academic journals.



Mark Mackinnon

Snr Bushfire Specialist / Snr Ecologist

Bushfire Planning & Design (BPAD), Accredited Practitioner Level 3. Accreditation number 36395.

B Env. Sci. (Hons); Grad. Dip. in Bushfire Protection

MEIANZ, White Card

Mark is a passionate and enthusiastic scientist who thrives in the field of natural resource management. Mark has worked for a number of inter-state government agencies and environmental consultancies. He has experience in threatened species, fire ecology, bushfire management, pest plant and animals, and landscape restoration. In particular, he specializes in ornithology and bushfire management. Mark has many specialised field-based skills including simple and complex tree climbing, working at heights, general firefighter departmental fire accreditation, venomous snake and reptile handling, immunization to handle bat species, and an A - class bird banding license with mist-net endorsement. Mark is also skilled in Arc and QGIS mapping, first-aid and four - wheel-driving.

Mark Sherring

Snr Botanist

BM, MAABR, Cert. Hort., Cert. Bush Regen, Cert. Rural Ops, White Card.

Member of the Australian Association of Bush Regenerators

Mark has extensive knowledge and experience of plant species in New South Wales. He has built up his expert knowledge on NSW native plant species over the many years that he has practised as a Botanist. He is regularly asked to contribute to the extensive (ongoing) flora surveys of the Sydney Basin and Blue Mountains carried out by the Royal Botanic Gardens, Sydney. Mark has extensive field survey experience, having worked for over ten years in various plant-related roles. His role in Abel Ecology is to provide expert advice on flora and on the full range of flora management issues encountered and in the design and management of environmental monitoring projects.

Nicholas Tong

Snr Ecologist

BAM Accredited Assessor (BAAS22012),

BSc (Biology), MPhil (Ecology), Cert. III CLM

MECA NSW, Snr First Aid, White card.

Nicholas is an experienced ecologist with expertise in fauna, plant species identification, vegetation assessment and ecological restoration. In the last six years, he has been a consulting ecologist to private developers and large corporations, for a variety of projects including State Significant Developments. Nick has extensive field work experience in Sydney, the Blue Mountains and Central West NSW. His Master's project investigated the impacts of exotic predators on herpetofauna in the arid zone. His role at Abel Ecology is to provide expert advice on fauna and the application of the Biodiversity Offset Scheme.



Andy Araya

Ecologist

B Env. Sci. MTeach (Env., Marine, Agr., Bio., Chem.), Dip. Marine Operations

First Aid Cert. White Card. ACDC Chemical Licence, NSW Boating Licence, Marine Radio Licence, Security Licence, Chainsaw Licence.

Andy has over 15 years' experience as a bush regeneration supervisor working across a number of environments throughout NSW and QLD from EEC of the Cumberland Plain, riparian and wetland areas, sand dunes and rainforests, to the higher elevations of the Blue Mountains National Park. Managing teams of up to 10 staff in remote areas as well as urban environments has allowed Andy to hone his skills of communication and native species identification. Andy's additional experience as a builder in the building and construction industry gives him a solid understanding of the considerations and legal requirements clients face in mitigating environmental and personal harm.

Emily Barbaro

Ecologist

BA, MPublishing, Grad. Cert. EnvSc, MEScM

Emily has completed a Graduate Certificate in Environmental Science and a Masters of Environmental Science and Management. During her degree, Emily also completed the Volunteer Botanical Training Program at the Australian National Herbarium, Centre for Australian National Biodiversity Research and CSIRO. The Program included both botanical and general herbarium tasks, such as archiving plant specimens, plant identification, and assistance with taxonomic research projects. Emily has previously worked as a Bush Regenerator and has been volunteering with Bushcare for Blue Mountains City Council for the last three years. She is passionate about continuing to learn more about her local Blue Mountains flora and fauna.

Rohan Chretien

Junior Ecologist

B Env. Bio

Rohan has completed a Bachelor of Environmental Biology (Environmental Sciences) at the University of Technology Sydney. During his degree, he completed a student research internship and volunteer research work under the UTS School of Life Sciences' Terrestrial Ecology Lab, developing his field surveying and reporting skills. This research looked at plant-pollinator interactions, native vegetation and invertebrate observation, as well as floral production of invasive species in disturbed environments. Rohan is passionate about furthering his understanding of ecological niches, systems and impacts as well as gaining an advanced knowledge of conservation practices.



Dr Stephanie Clark

Specialist Consultant

B Sc (Hons), PhD

Stephanie has over 30 years' experience in the collection, identification and taxonomy of marine, estuarine, freshwater and terrestrial molluscs. She has conducted numerous targeted surveys for endangered and threatened species (particularly land and freshwater molluscs) in both Australia and the United States. She is particularly interested in the systematics, taxonomy, morphology (external and internal), population and conservation genetics and conservation of molluscs particularly terrestrial (especially the *Helicoidea*) and freshwater (especially the *Hydrobiidae* and related families) groups.