

5 November 2021

Our ref: 21SYD-20282

Health Infrastructure

C/-APG

7 Essex Street

Sydney NSW 2000

Attention: Harrison Wang

Dear Harrison,

Ecology Statement – Modification to SSD 9036 - Concord Hospital Carpark Project

This statement considers the ecological impact of the removal of an additional ten planted trees for the construction of a multi-level carpark and temporary carpark as part of the Concord Hospital redevelopment. This is being assessed as a modification to State Significant Development (SSD) 9036 previously approved.

The tree species to be removed as part of this modification are detailed in the Draft Arboricultural Impacts Assessment Report September 2021, prepared by Allied Tree Consultancy. These trees, including their conservation status if relevant, are summarised in Table 1 and displayed on Figure 1.

Table 1: Trees to be impacted

Tree number	Scientific name	Common name	Status
10	<i>Melaleuca bracteata</i>	'Revolution Gold' Golden Tea Tree	Native horticultural planting
15	<i>Jacaranda mimosifolia</i>	Jacaranda	Exotic horticultural planting
16	<i>Eucalyptus botryoides</i>	Bangalay	Native horticultural planting
17	<i>Cupaniopsis anacardioides</i>	Tuckeroo	Native horticultural planting
150	<i>Liquidambar styraciflua</i>	Liquidambar	Exotic horticultural planting
155	<i>Callistemon viminalis</i>	Weeping Red Bottlebrush	Native horticultural planting
156	<i>Hymenosporum flavum</i>	Native Frangipani	Native horticultural planting
162	<i>Eucalyptus scoparia</i>	Wallangarra White Gum	Native horticultural planting. The species is listed as Endangered under the NSW <i>Biodiversity Conservation Act 2016</i> and Vulnerable under the Commonwealth

Tree number	Scientific name	Common name	Status
			<i>Environment Protection Biodiversity Conservation Act 1999.</i> Within NSW and nationally this species has a highly restricted natural range, and does not occur naturally within the Sydney Basin. It is a widely cultivated horticultural species, and has been planted as an amenity tree within the site. Therefore further assessment under the state and Commonwealth legislation is not required.
163	<i>Eucalyptus scoparia</i>	Wallangarra White Gum	As above
164	<i>Liquidambar styraciflua</i>	Liquidambar	Exotic horticultural planting

In 2018, Eco Logical Australia Pty Ltd was engaged to undertake a Biodiversity Development Assessment Report Waiver (BDAR Waiver) and Flora and Fauna Assessment (FFA) for the proposed development. The field assessment undertaken as part of these assessments mapped the vegetation on site as Urban Exotic and Native Plantings (Figure 2) and not forming part of a native Plant Community Type. The ten subject trees are consistent with this mapping and assessment.

Importantly it should be noted that the FFA assessed a greater area of vegetation to be removed than was required for the SSD: *The proposed upgrades will require the clearing of approximately 0.17 ha of urban exotic and native vegetation (the impacted vegetation does not meet the definition of any NSW PCT). For the purposes of the impact assessment, surrounding vegetation of up to 1.34 ha of clearing of urban exotic and native vegetation was assumed.* (ELA 2018). It is therefore considered highly likely that these ten trees were included in this worst-case scenario assessment (Figure 1).

The subject planted trees are considered to contain low biodiversity value due to their cultivated status. This is consistent with the conclusions of the BDAR Waiver and FFA. Some species such as *Callistemon viminalis* and *Eucalyptus botryoides* may provide marginal seasonal foraging resources for *Pteropus poliocephalus* (Grey-headed Flying-fox) listed under the NSW *Biodiversity Conservation Act 2016* and Commonwealth *Environment Protection Biodiversity Conservation Act 1999* and microchiropteran bats listed under the *Biodiversity Conservation Act 2016*. This assessment is consistent with the conclusions of the BDAR Waiver and FFA.

Impact assessments under both the *Biodiversity Conservation Act 2016* and *Environment Protection Biodiversity Conservation Act 1999* were undertaken for *Pteropus poliocephalus* (Grey-headed Flying-fox), and microchiropteran bats as part of the FFA. These impact assessments were based on a worst case scenario of 1.34 ha of clearing and concluded a non-significant impact on threatened species. It is considered that the removal of these cultivated species does not change the outcome of these impact assessment, based on the fact that the worst case scenario of 1.34 ha of clearing was assessed, and the fact that the trees are of low biodiversity value, providing limited resources for threatened species.

Therefore, the conclusions of the BDAR Waiver and FFA remain unchanged as a result of the proposed modification to SSD 9036, and no modifications to the BDAR Waiver and FFA are required. Therefore the proposed modification satisfies Section 7.17 (2)(c) of the *Biodiversity Conservation Act 2016*.

Yours Sincerely,



Nicole McVicar
Senior Ecologist and Accredited Assessor BAAS18077

REFERENCES

Allied Tree Consultancy 2021 *Draft Arboricultural Impacts Assessment Report September 2021 Version 9.21* Prepared for Health Infrastructure C/- APG

Eco Logical Australia 2018. *Concord Hospital Upgrade Flora and Fauna Assessment*. Prepared for NSW Health Infrastructure

Eco Logical Australia 2018. *Request for Waiver of Biodiversity Development Assessment Report*. Prepared for NSW Health Infrastructure

Appendix C- Tree removal/retention plan



Figure 1: Tree removal/retention plan (Allied Tree Consultancy 2021)



Figure 2: ELA validated vegetation 2018