

15th April 2026

Re: Request for a Biodiversity Development Assessment Report (BDAR) Waiver for the proposed mixed-use development at 494-516 Military Road, Mosman.

Introduction

This BDAR Waiver Request has been prepared for Abadeen Administration Pty Ltd to accompany a State Significant Development Application (SSDA) (SSD-93787211) for the proposed mixed-use development at 494-516 Military Road, Mosman ('the Subject Property'). The relevant proponent details for the purposes of this application are as follows:

- Proponent Name: Abadeen Administration Pty Ltd
- Representative and role: Adrian Giardina – Senior Development Manager
- Contact Number: 0439 070 388
- Email: adrian.giardina@abadeen.com

This BDAR Waiver Request has been prepared in response to the requirements contained within the Planning Secretary's Environmental Assessment Requirements (SEARs) for SSD-93787211 and directly responds to the relevant SEAR(s) outlined in **Table 1**.

Table 1. SEARs Compliance Table

SEARs Item	Report Section / Response
▪ Unless a waiver has been granted, provide a Biodiversity Development Assessment Report (BDAR) that assesses any biodiversity impacts associated with the development in accordance with the <i>Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020</i>.	The proposed development is not expected to impact on biodiversity hence why a BDAR Waiver is being sought through the preparation of this report.
OR	The Subject Property is also not located on certified land.
▪ If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	

Site Description

The Subject Property is identified as 494-516 Military Road, Mosman (**Figure 1**). It is located within the Mosman Council Local Government Area (LGA) and comprises six (6) irregular lots (Lots 1-4/-/DP4628, Lot 9/-/DP3547, Lot 11/-/DP3308) with an area of approximately 0.32ha. Surrounding streetscapes are Military Road, Hale Road, Lang Street, and Mackie Lane. The site is currently a nursey with a community garden, and previously the site was a petrol station. The site forms part of the Military Road Corridor Business Centre under the Mosman Business Centre DCP 2012. The Subject Property is illustrated in **Figure 1**. Part of the Subject Property includes land owned by Ausgrid.

Planning Approval Strategy

Section 7.9(2) of the NSW Biodiversity Conservation Act 2016 (BC Act) stipulates the following in regard to any development that qualifies as a State Significant Development:

- “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”.

Project Description

The SSDA seeks development consent for a mixed-use development (shop-top housing) at 494-516 Military Road, Mosman, which includes:

- Mixed Use – shop top housing;
- Four (4) retail businesses;
- 1 open public space;
- Part 6 - Part 8 storeys;
- 2 basement levels;
- Circa 100 apartments; and
- Private and affordable housing.

All works associated with the proposed SSDA will hereafter be referred to as the “Subject Land” (**Figure 1**). Part of the Subject Land is owned by Ausgrid.

Secretary’s Environmental Assessment Requirements

This BDAR Waiver has been prepared to be submitted prior to the SSD Application to demonstrate that the proposed development is not likely to have any significant impacts on biodiversity values. As such it addresses the specific project requirements provided in the Secretary’s Environmental Assessment Requirements (SEARs) issued by the NSW Department of Planning, Housing and Infrastructure (DPHI) (SSD-93787211).

Biodiversity

The Subject Land occupies the entirety of the Subject Property (**Figure 1**) and contains two (2) retail buildings (nursery and mechanic) and a community garden, as well as existing hardstand. The vegetation was sparse, however where present it was dominated by common urban landscaping including planted native and exotic species and common weeds, typical of an urban city environment. Vegetables were present in the community garden and the nursery contained common species used for landscaping. The vegetation within the Subject Land is described in **Table 2** and displayed in **Figure 2**.

Buildings are present within the Subject Land, however they were not considered suitable for microchiropteran bat species.

Impacts on biodiversity values

The relevance and potential impacts to biodiversity values, as defined in the BC Act and the *Biodiversity Conservation Regulation 2017* (BC Regulation) is discussed in **Table 4**. **Table 4** has been completed by Narla Ecologist Gemma Hicks who has a Bachelor of Biodiversity and Conservation, and reviewed by Jonathan Coy who has a Bachelor of Environment (Environmental Management) and is an Accredited Biodiversity Assessor under the BAM (BAAS23022; **Appendix E**).

Where a biodiversity value is relevant, an explanation of how impacts have been avoided and the likelihood and extent of any remaining impacts of the proposed development (including impacts prescribed under regulation 6.1 of the BC Regulation) have been assessed. A list of vegetation identified within the Subject Land is detailed in **Appendix A**, and general photos of vegetation within the Subject Land are presented in **Appendix C**.

Targeted Microbat Survey

Owing to the presence of man-made structures within the Subject Land that will require removal to facilitate the proposed development, a targeted survey for threatened microchiropteran bat species with potential to utilise such habitat was conducted.

Eight (8) threatened microchiropteran bat species, which are known to inhabit buildings, occur within the locality of the Subject Land (NDCCEEW 2026):

- *Chalinolobus dwyeri* (Large-eared Pied Bat);
- *Falsistrellus tasmaniensis* (Eastern False Pipistrelle);
- *Micronomus norfolkensis* (Eastern Coastal Free-tailed Bat);
- *Miniopterus australis* (Little Bent-winged Bat)
- *Miniopterus orianae oceanensis* (Large Bent-winged Bat);
- *Myotis macropus* (Southern Myotis);
- *Saccolaimus flaviventris* (Yellow-bellied Sheath Tail Bat); and
- *Scoteanax rueppellii* (Greater Broad-nosed Bat).

Surveys were conducted during daylight hours, on the 19th of March 2026 by experienced Narla Ecologists Jonathan Coy and Gemma Hicks. During the assessments the Ecologists conducted a walkthrough of both the inside (including inspections of roof space) and outside of all structure proposed for removal. The ecologists focussed searches on potential entry and exit points as well as cracks, crevices and holes that could be utilised for roosting (**Appendix D**). Each area of potential habitat was examined using a torch or endoscope, and a EchoMeter Touch 2 Pro to record any potential individuals for analysis.

No microchiropteran bats were observed within or surrounding the structures during the site assessment. Furthermore, no signs of recent occupation by microchiropteran bats (i.e. scats) were observed within the structures during the site assessment as the buildings did not contain enclosed roof spaces that would provide suitable protection and habitat for any microchiropteran species. These results suggest the man-made structures within the Subject Land have not been utilised as a roost site.

Conclusion

It is not expected that the proposed development will impact upon biodiversity values, therefore this letter should be submitted in support of the application for a BDAR Waiver.

Report Completed by:

Gemma Hicks – Ecologist

Bachelor of Biodiversity and Conservation

Narla Environmental Pty Ltd

Report Reviewed by:

Jonathan Coy –Project Manager/Ecologist

Bachelor of Environment

Narla Environmental Pty Ltd



Figure 1. Location of the Subject Land within the Subject Property.



Figure 2. Ecological Features identified within and adjacent to the Subject Land.

Table 2. Planted Urban Native and Exotic Vegetation within the Subject Land.

Planted Urban Native and Exotic Vegetation	
	
Extent within the Subject Land (approx.)	0.08ha
Description of the Vegetation within the Subject Land	
The vegetation within the Subject Land consisted of commonly landscaped species typical of an urban environment, as well as vegetable patches and exotic potted plants typical of a community garden and nursery. Native planted species that are commonly cultivated included <i>Acacia longifolia</i>, <i>Acmena smithii</i>, <i>Cordyline stricta</i>, <i>Eucalyptus grandis</i>, <i>Ficus spp.</i>, <i>Leptospermum trinervium</i>, <i>Murraya paniculata</i> and <i>Westringia fruticosa</i>. Common native groundcover species found within the community garden included <i>Commelina cyanea</i>, <i>Dichondra repens</i>, <i>Lobelia purpurascens</i>, <i>Nephrolepis exaltata</i>, <i>Oplismenus aemulus</i>, <i>Pandorea pandorana</i>, and <i>Viola hederacea</i>. These species are typical in urban lawns and gardens. The community garden also contained multiple vegetable patches, which included <i>Abelmoschus esculentus</i>, <i>Allium fistulosum</i>, <i>Antheum graveolens</i>, <i>Beta vulgaris</i>, <i>Mangifera indica</i>, <i>Potentilla indica</i>, <i>Punica granatum</i>, <i>Raphanus sativus</i>, <i>Salvia rosmarinus</i>, <i>Spinicia oleracea</i>. The nursery contained commonly planted and cultivated species, including a variety of <i>Citrus spp.</i>, <i>Magnolia spp.</i>, <i>Plumeria spp.</i>, <i>Rosa spp.</i>. All plants in the nursery were contained within pots, with the exception of <i>Lagerstroemia spp.</i>, and <i>Magnolia grandiflora</i>. Common exotic groundcovers were sporadically present throughout the Subject Land. These included <i>Conyza bonariensis</i>, <i>Cymbalaria muralis</i>, <i>Cyperus gracilis</i>, <i>Digitaria sanguinalis</i>, <i>Paspalum dilatatum</i>, <i>Phyllanthus tenellus</i>, <i>Soliva sessilis</i>, <i>Sonchus oleraceus</i>, <i>Stellaria media</i> and <i>Taraxacum officinale</i>.	
Justification of Vegetation Assignment	This assemblage of species within the landscape of the Subject Land does not conform to any locally occurring Plant Community Type (PCT) and has therefore been classified as Planted Urban Native and Exotic Vegetation.
TEC Status	Not Listed.

Table 3. BDAR Waiver request information requirements.

Admin	Proponent Name: Abadeen Administration Pty Ltd Representative and role: Adrian Giardina Contact Number: 0439 070 388 Email: adrian.giardina@abadeen.com Project ID: SSD-93787211 Name and Ecological Qualifications of Person Completing (Appendix E) Gemma Hicks – Bachelor of Biodiversity and Conservation from Macquarie University
Site Details	The Subject Property is identified as 494-516 Military Road, Mosman (Figure 1). It is located within the Mosman Council Local Government Area (LGA) and comprises six (6) irregular lots (Lots 1-4/-/DP4628, Lot 9/-/DP3547, Lot 11/-/DP3308) with an area of approximately 0.32ha. Surrounding streetscapes are Military Road, Hale Road, Lang Street, and Mackie Lane. The site is currently a nursesey with a community garden. Previously the site was a petrol station. The site forms part of the Military Road Corridor Business Centre under the Mosman Business Centre DCP 2012. The Subject Property is illustrated in Figure 1. Part of the Subject Property includes land owned by Ausgrid.
Proposed Development	▪ Mixed Use – shop top housing; ▪ Four (4) retail businesses; ▪ 1 open public space; ▪ Part 6 - Part 8 storeys; ▪ 2 basement levels; ▪ Circa 100 apartments; and ▪ Private and affordable housing.
Impacts on Biodiversity Values	Table 4 below has been completed detailing the impacts on Biodiversity Values.

Table 4. Impacts of the proposed development on biodiversity values.

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
Vegetation abundance – <i>BC Regulation Section 1.4(b)</i>	Occurrence and abundance of vegetation at a particular site	Yes	The proposed development does not impact upon any locally occurring vegetation community, only requiring the removal of areas containing Planted Urban Native and Exotic Vegetation present in planted manicured gardens, hedging and landscaped areas. The vegetation could not be assigned a native PCT due to distribution, geology or landscape position of the Subject Land as well as the dominance of exotic species and commonly landscaped native species that have been planted within the Subject Land. Such landscaped vegetation is common in the locality in the form of urban gardens, street trees and lawns. It is unlikely that the removal of such vegetation would significantly impact on biodiversity values.
Vegetation integrity – <i>BC Act Section 1.5(2)(a)</i>	Degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near-natural state	N/A	The vegetation within the Subject Land does not conform to a native plant community as it best reflects Planted Urban Native and Exotic Vegetation, present as manicured gardens, hedging and landscaped areas, as demonstrated in Appendix C . The vegetation could not be assigned a native PCT due to distribution, geology or landscape position of the Subject Land as well as the dominance of exotic species and commonly landscaped native species that have been planted within the Subject Land, highlighting the landscape's alteration from its natural state. As such, the vegetation does not have an integrity score.
Habitat suitability – <i>BC Act Section 1.5(2)(b)</i>	Degree to which the habitat needs of threatened species are present at a particular site	Yes	The vegetation in the Subject Land may periodically provide potential foraging habitat for threatened species such as <i>Pteropus poliocephalus</i> (Grey-headed Flying-fox), which is known to forage on cultivated gardens and fruiting trees. However, given the urban nature of the Subject Land and its disturbed nature, it unlikely to be significant foraging habitat for any threatened species that may utilise it. Should any species forage on this habitat extensive areas of the same quality of habitat will continue to exist in areas adjacent to the Subject Land in the form of local parkland and nearby residential lots. Human-made structures, which may provide habitat for threatened species such as microbats, will be demolished as part of the proposed works. Targeted surveys of areas within these structures such as roof spaces, holes, cracks and cavities, that were considered to provide potential habitat were conducted by Narla Ecologists in March 2026 and no individuals were identified. Details of the survey conducted are provided above. To further mitigate potential impacts a pre-clearance survey is to be conducted for microbats in the buildings prior to removal, in case any individuals have entered the structures in the time between the survey and removal. If any individuals are found to be present, they are to be captured the morning of deconstruction works and released at night time into nearby bushland following works.

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
			The impacts to exotic species are not considered to sustain any threatened species beyond providing sporadic foraging habitat.
Threatened species abundance – <i>BC Regulation Section 1.4(a)</i>	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	Yes	A threatened flora and habitat survey was undertaken in accordance with <i>Surveying threatened plants and their habitats</i> (DPIE 2020) and no individuals were identified within the Subject Land. No threatened ecological communities were identified with the Subject Land. The vegetation in the Subject Land may periodically provide potential foraging habitat for threatened species such as <i>Pteropus poliocephalus</i> (Grey-headed Flying-fox), which is known to forage on cultivated gardens and fruiting trees. However, given the urban nature of the Subject Land and its disturbed nature, it unlikely to be significant foraging habitat for any threatened species that may utilise it. Should any species forage on this habitat extensive areas of the same quality of habitat will continue to exist in areas adjacent to the Subject Land in the form of local parkland and nearby residential lots. Human-made structures, which may provide habitat for threatened species such as microbats, will be demolished as part of the proposed works. Targeted surveys of areas within these structures such as roof spaces, holes, cracks and cavities, that were considered to provide potential habitat were conducted by Narla Ecologists in March 2026 and no individuals were identified. Details of the survey conducted are provided above. To further mitigate potential impacts a pre-clearance survey is to be conducted for microbats in the buildings prior to removal, in case any individuals have entered the structures in the time between the survey and removal. If any individuals are found to be present, they are to be captured the morning of deconstruction works and released at night time into nearby bushland following works. The impacts to exotic species are not considered to sustain any threatened species beyond providing sporadic foraging habitat.
Habitat connectivity – <i>BC Regulation Section 1.4(c)</i>	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	Yes	The Subject Land is located within a highly urbanised and altered landscape which would likely only provide habitat for highly mobile species such as avian species or Grey-headed Flying Fox. In its current state the Subject Land only shares connectivity to the broader landscape via planted street trees and gardens. The same quality of connectivity is expected to continue post works. The removal and refurbishment of human made structures will also not impact habitat connectivity. Human made structures are only utilised by highly mobile threatened species that are able to traverse large areas and

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
			landscapes. The removal and alteration of select structures from within an urbanised environment would result in a negligible impact to connectivity for such species should they be dependent on such habitat. Furthermore, inspections were done within each structure to confirm the presence or absence of any threatened species that may be utilising those structures as habitat. During the surveys all roof spaces were assessed, as well as all cracks and crevices to look for signs of roosting microbats. The surveys found that no microbats or other threatened species were located within any of the structures to be removed or altered. To further mitigate any potential risk a Building Pre-demolition inspection is proposed to ensure to microbat species have not inhabited the buildings in the time between the surveys and the works commencing.
Threatened species movement – <i>BC Regulation Section 1.4(d)</i>	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	N/A	It is not expected that the vegetation within the Subject Land contributes to the movement of threatened species to maintain their lifecycle (e.g migratory species or movement to breeding habitat). The vegetation within the Subject Land may potentially be used by threatened species as sporadic fly ins, however as previously discussed, habitat connectivity is only available for highly mobile species and the same quality of connectivity is expected to continue post works. The human made structures within the Subject Land can only be accessed by highly mobile threatened species that are able to traverse large areas and landscapes. The removal and alteration of these buildings and replacement of subsequent other buildings from within and existing urban environment is not expected to result in any significant impact to the movement of these species, especially none that maintain their lifecycle. Furthermore, inspections were done within each structure to confirm the presence or absence of any threatened species that may be utilising those structures as habitat. During the surveys all roof spaces were assessed, as well as all cracks and crevices to look for signs of roosting microbats and other threatened species. The surveys found that no microbats or other threatened species were located within any of the structures to be removed or altered. To further mitigate any potential risk a Building Pre-demolition inspection is proposed to ensure to microbat species have not inhabited the buildings in the time between the surveys and the works commencing.
Flight path integrity – <i>BC Regulation Section 1.4(e)</i>	Degree to which the flight paths of protected animals over a particular site are free from interference	N/A	It is unlikely that the Subject Land is part of a flight path used by threatened species. Furthermore, the proposed development will be consistent with the surrounding urban landscape and building height. As such, flight path integrity is not expected to be impacted by the development.
Water sustainability –	Degree to which water quality, water bodies and hydrological processes	N/A	The proposed development is not likely to result in impacts to water quality, water bodies or hydrological process that sustain threatened species or threatened ecological communities. No threatened communities were identified within the Subject Land and no threatened species that are depended on these features is

Biodiversity Value	Meaning	Relevant?	Values within the Subject Land and Potential Impacts associated with the development
<i>BC Regulation Section 1.4(f)</i>	sustain threatened species and threatened ecological communities at a particular site		considered likely to be present. The proposed development is not located near a mapped watercourse. As such the proposed development is unlikely to result in any changes to hydrological processes or water quality.

Appendices

Appendix A. Ground Floor Plans (DKO 2026).

Appendix B. Vegetation identified within and surrounding the Subject Land.

Appendix C. General Photos of Vegetation within the Subject Land.

Appendix D. Images taken during the Microchiropteran Survey

Appendix E. Relevant qualifications of person completing the report (including Table 4).

Architectural drawing of the ground floor plan for a residential development. The plan shows a large yellow area labeled "COMMERCIAL OFFICE" and a large pink area labeled "RESIDENTIAL (LOCAL RESIDENTS)". The plan is bounded by Hale Road to the north, Military Road to the south, and Lang Street to the east. A large circular feature is visible in the center. The drawing includes various rooms, corridors, and outdoor spaces. A north arrow is located in the top left corner.



Appendix B. Vegetation identified within and surrounding the Subject Land.

Scientific Name	Canopy	Midstorey	Ground
<i>Abelmoschus esculentus</i> *			X
<i>Acacia longifolia</i>		X	
<i>Acmena smithii</i>		X	
<i>Allium fistulosum</i> *			X
<i>Anethum graveolens</i> *			X
<i>Beta vulgaris</i> *			X
<i>Callistemon citrinus</i>		X	
<i>Cenchrus setaceus</i> *			X
<i>Centella asiatica</i> *			X
<i>Chloris gayana</i> *			X
<i>Citrus × aurantiifolia</i> *		X	
<i>Citrus x limon</i> *		X	
<i>Coleus barbatus</i> *			X
<i>Commelina cyanea</i>			X
<i>Conyza bonariensis</i> *			X
<i>Cordyline stricta</i>		X	
<i>Cosmos bipinnatus</i> *			X
<i>Cupressus spp.</i> *	X		
<i>Cymbalaria muralis</i> *			X
<i>Cyperus gracilis</i> *			X
<i>Cyperus rotundus</i> *			X
<i>Dichondra repens</i>			X
<i>Digitaria sanguinalis</i> *			X
<i>Eleusine indica</i> *			X
<i>Eriobotrya japonica</i> *	X		
<i>Eucalyptus grandis</i>	X		
<i>Eucalyptus racemosa</i>	X		
<i>Eucalyptus sideroxylon</i>	X		
<i>Gardenia jasminoides</i> *			X
<i>Lagerstroemia spp.</i> *			
<i>Leptospermum trinervium</i>		X	
<i>Lotus subbiflorus</i> *			X
<i>Magnolia grandiflora</i> *	X		
<i>Mangifera indica</i> *		X	
<i>Murraya koenigii</i> *		X	
<i>Murraya paniculata</i>		X	
<i>Nephrolepis exaltata</i>			X
<i>Oplismenus aemulus</i>			X
<i>Oxalis spp.</i>			X
<i>Pandorea pandorana</i>			X
<i>Paspalum dilatatum</i> *			X
<i>Pelargonium graveolens</i> *			X
<i>Pentas lanceolata</i> *			X

Scientific Name	Canopy	Midstorey	Ground
<i>Phyllanthus tenellus</i> *			x
<i>Plumeria rubra</i> *		x	
<i>Potentilla indica</i> *			x
<i>Punica granatum</i> *		x	
<i>Pyrostegia venusta</i> *		x	
<i>Raphanus sativus</i> *			x
<i>Rosa spp.</i> *		x	
<i>Salvia guaranitica</i> *		x	
<i>Salvia Rosmarinus</i> *		x	
<i>Solanum nigrum</i> *			x
<i>Soliva sessilis</i> *			x
<i>Sonchus oleraceus</i> *			x
<i>Spinacia oleracea</i> *			x
<i>Stellaria media</i> *			x
<i>Taraxacum officinale</i> *			x
<i>Trachelospermum jasminoides</i> *		x	
<i>Westringia fruticosa</i>		x	

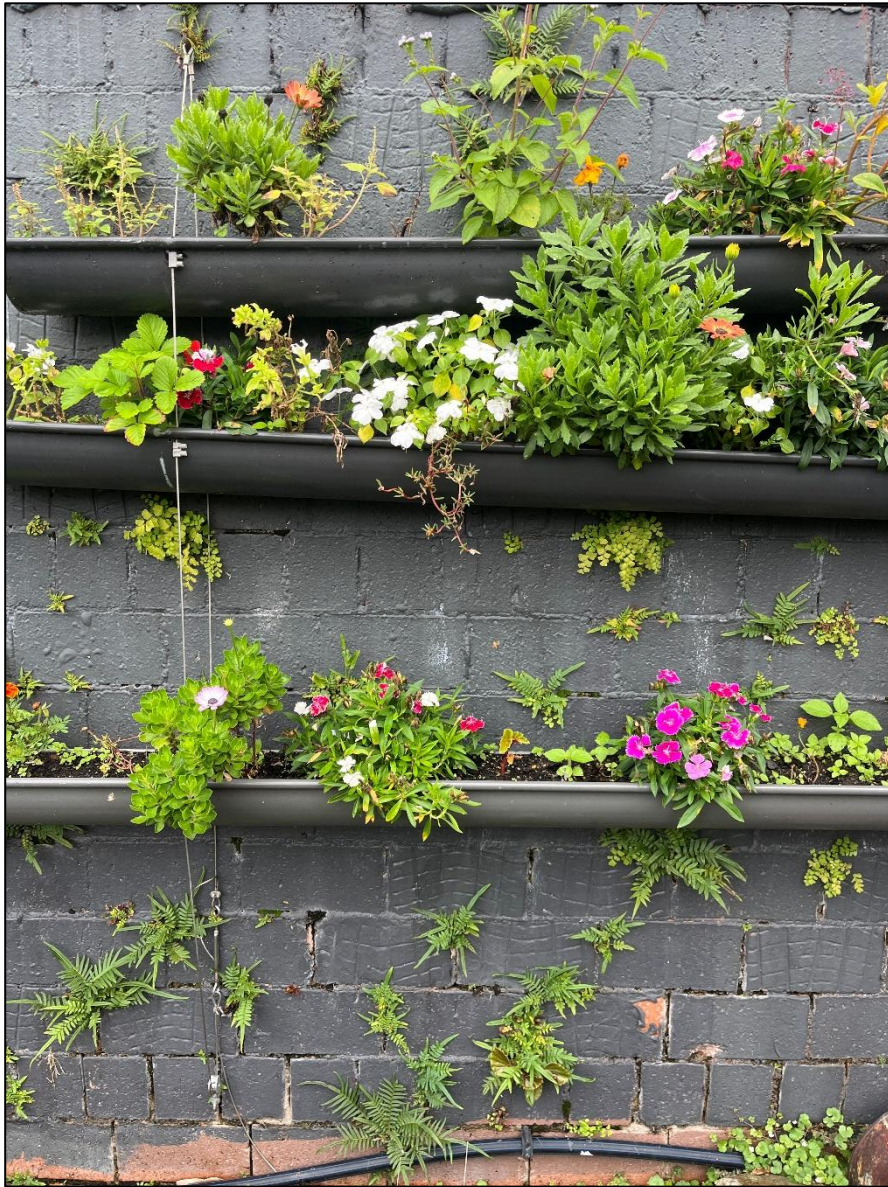
*Denotes exotic species

**Denotes Priority Weed species

Appendix C. General Photos of Vegetation within the Subject Land.







Appendix D. Images taken during the Microchiropteran Survey.



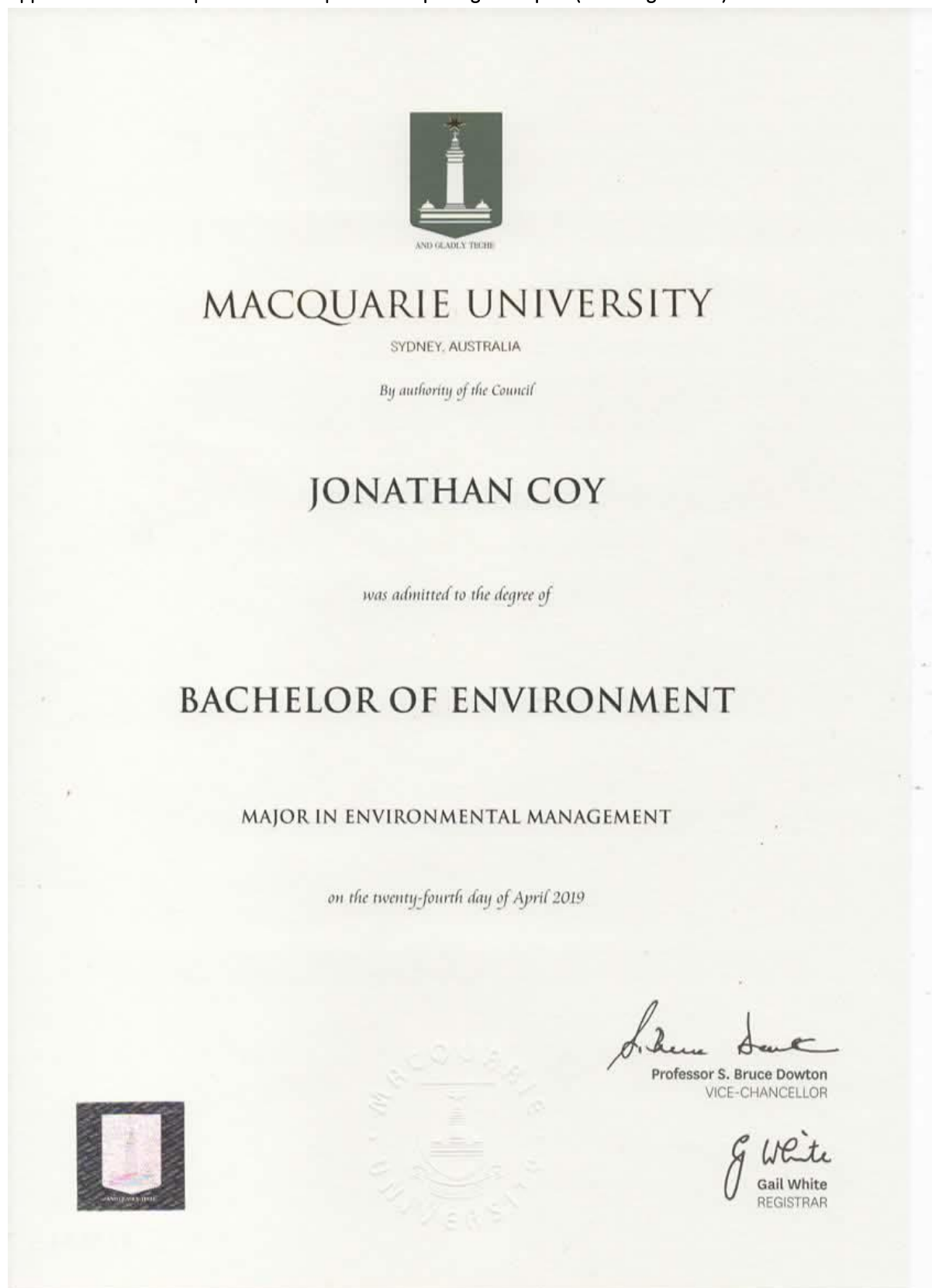








Appendix E. Relevant qualifications of person completing the report (including Table 4).





AND GLADLY THERE

MACQUARIE UNIVERSITY

SYDNEY, AUSTRALIA

By authority of the Council

GEMMA HICKS

was admitted to the degree of

BACHELOR OF BIODIVERSITY AND CONSERVATION

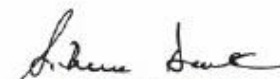
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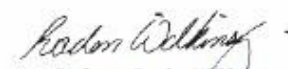
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Professor S. Bruce Dowton
VICE-CHANCELLOR


Professor Rorden Wilkinson
REGISTRAR