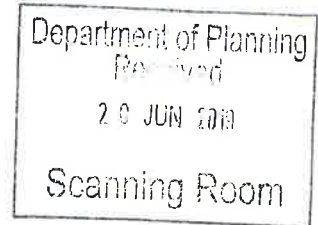




Objecting Submission
Ivanhoe Estate, Macquarie Park
SSD 8707



Thank you for the opportunity to comment on this development. We object on the following grounds:

- The site includes 1.64ha of Sydney Turpentine Ironbark Forest (STIF) which is an endangered ecological community (EEC) under the Biodiversity Conservation Act 2016 (BC Act) and is also a critically endangered ecological community under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). We believe that the proposed development fails to avoid direct impacts on this threatened ecological community.
- The Framework for Biodiversity Assessment (FBA) requires proponents to identify and avoid direct impacts to threatened ecological communities. We consider that adequate planning/siting of the proposal has not been carried as per the FBA. An alternative footprint design could avoid impacting on the EEC. More than half of the EEC will be removed under the current proposal. The development footprint should be reduced to ensure the least amount of vegetation is to be cleared.
- The consultant's report does not assess what the impact is on the remaining vegetation from overshadowing and limited light particularly where good quality STIF is located along Epping Rd.
- The proposed access to the site off Epping Road should be removed as it has a major impact on this EEC.
- Five trees with large hollows are earmarked for removal which is a significant number given its setting. There appears to be no recognition that the hollows may provide breeding or refuge habitat for threatened species. These hollows may be suitable habitat for the Powerful Owl (*Ninox strenua*), a species that has been recorded a number of times in the vicinity of the site. However there appears to be no mention of this in the BAR assessment.
- Indeed, it appears that no detail of the habitat assessment has been provided in the BAR assessment.
- The BAR states that no threatened plant species were observed on the site. However the BAR Appendix lists *Melaleuca deanei* which occurs within the construction footprint. This species is listed as vulnerable under the BC Act and the EPBC Act.
- The BAR states that for both *Acacia pubescens* and *Syzygium paniculatum* there is no habitat. The site appears to contain likely habitat for both of these species and *Syzygium paniculatum* is recorded at an adjacent site.
- The proposal should aim to minimise landform alteration and preserve existing trees. Stepped terraces should not be used in the forest areas.
- The site does not appear to have been adequately surveyed as the exact location of development site is currently not known.
- No roads or drainage lines, including Shrimptons Creek, are identified on any of the figures. These must be provided to enable proper consideration of the environmental impacts of this development.

- A buffer to Shrimptons Creek is needed to avoid impacts to the existing vegetation along the creek.
- The proponent may need to refer this concept proposal to the Commonwealth Government as a matter of national environmental significance given the Sydney Turpentine Ironbark Forest (STIF) is a CEEC under the EPBC Act.
- A Biodiversity Management Plan, a weed management plan, a Construction Environment Management Plan and a Vegetation Management plan to provide for management of the retained areas of the EEC are required and need to be a condition on any forthcoming development approval.
- There should be no pathway included within the 20m riparian corridor as it may have negative impacts from runoff and other pollutants. Active recreation may affect water quality, bank stability and conflict with the goal of rehabilitating Shrimptons Creek in the long term.
- The E2 zone should be extended into the site within the riparian corridor to protect both the adjoining corridor and the rehabilitated corridor.
- An Aboriginal heritage assessment must be provided. Due diligence should not be used for major projects including state significant developments. An Aboriginal Cultural Heritage Assessment Report should be undertaken.

Sincerely

*Gemma Bush
(Pepping Civic Trust)*