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Biodiversity Development Assessment Report

Centre of Excellence in Agricultural Education at Richmond

Vines Drive, Richmond NSW 2753

NBRS Architecture c/o Schools Infrastructure NSW

July 2021



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environmental

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Glossary

Acronym/ Term	Definition
Accredited Biodiversity Assessor	Individuals accredited by the Department of Planning, Industry and Environment (DPIE) to apply the Biodiversity Assessment Method.
APZ	Asset Protection Zone
BAM	The NSW Biodiversity Assessment Method
BAMC	The NSW Biodiversity Assessment Method Calculator
BC Act	New South Wales Biodiversity Conservation Act 2016
BDAR	Biodiversity Development Assessment Report
Biodiversity credit report	The report produced by the Credit Calculator that sets out the number and class of biodiversity credits required to offset the remaining adverse impacts on biodiversity values at a development site, or on land to be biodiversity certified.
Biodiversity Offsets	Management actions that are undertaken to achieve a gain in biodiversity values on areas of land in order to compensate for losses to biodiversity from the impacts of development.
Biodiversity values	The composition, structure and function of ecosystems, including threatened species, populations and ecological communities, and their habitats.
BOS	NSW Biodiversity Offset Scheme
CEEC	Critically Endangered Ecological Community
DPIE	NSW Department of Planning, Industry and Environment (formerly OEH)
Ecosystem credit	The class of biodiversity credit that relates to a vegetation type and the threatened species that are reliably predicted by that vegetation type (as a habitat surrogate).
EEC	Endangered Ecological Community
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
ha	Hectares
HTE	High Threat Exotic
km	Kilometres
Lease Area	Location of the proposed works within on Vines Drive (Lot 2 DP 1051798)
LGA	Local Government Area
Locality	A 1500m buffer area surrounding the Subject Land
m	metres
Native Vegetation	Means any of the following types of plants native to New South Wales: (a) trees (including any sapling or shrub), (b) understorey plants, (c) groundcover (being any type of herbaceous vegetation), (d) plants occurring in a wetland.
NSW	The State of New South Wales
OEH	Office of Environment and Heritage (now DPIE)
PCT	NSW Plant Community Type
Proposal	The development, activity or action proposed.
SAII	Serious and Irreversible Impacts
SAII entity	Species and ecological communities that are likely to be the subject of serious and irreversible impacts (SAIIs)
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
Species credit	The class of biodiversity credit that relate to threatened species that cannot be reliably predicted to use an area of land based on habitat surrogates. Species that require species credits are listed in the Threatened Biodiversity Data Collection.
SSDA	State Significant Development Application
Subject Land	The Operational Footprint, Construction Footprint and APZ.

Acronym/ Term	Definition
Threatened species, populations and ecological communities	Species, populations and ecological communities specified in Schedules 1 and 2 of the BC Act 2016.
TPZ	Tree Protection Zone: A specified area above and below ground and at a given distance from the trunk set aside for the protection of a tree's roots and crown to provide for the viability and stability of a tree to be retained where it is potentially subject to damage by development
VIS Plot	Vegetation Integrity Survey Plot

Executive Summary

Narla Environmental Pty Ltd (Narla) was commissioned by NBR Architecture c/o School's Infrastructure NSW ('the proponent') to prepare a Biodiversity Development Assessment Report (BDAR) to accompany a State Significant Development Application (SSDA) for the new Hawkesbury Centre of Excellence, located within the Western Sydney University Campus on Vines Drive, Richmond (Lot 2/DP1051798). The BDAR will assess the biodiversity impacts of the proposed development in accordance with the requirements of the Biodiversity Conservation Act 2016 and Biodiversity Conservation Regulation 2017. The assessment has been completed in accordance with Appendix K of the BAM (DPIE 2020a).

The proposed development will involve the construction of a secondary school known as the Centre of Excellence (CoE) in Agricultural Education at Richmond. The proposed works will involve the development of new administrative, learning, dining, temporary accommodation, farming and aboriginal enterprise buildings, as well as establishing several new dams, agricultural plots, an orchard as well as driveways, walkways and other hardstand areas.

The proposed development has been divided into three components, which are collectively referred to as the 'Subject Land': the operational footprint (3.67ha); the construction footprint (1.07ha); and the retained vegetation to be managed as an APZ (2.35ha). Most vegetation within the Subject Land will require removal to accommodate the proposed development, with the exception of the vegetation marked for retention (which will be managed as an Asset Protection Zone). The proposed development has been purposefully designed to minimise impacts on biodiversity values. The removal of vegetation within the Subject Land has largely been avoided, as the proposed development is mostly positioned in an area that has been historically cleared (having the least biodiversity values).

The proposed development is expected to impact one (1) Plant Community Type (PCT) 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion. The following ecosystem credits are required to be offset in order to mitigate the impacts upon biodiversity as a result of the proposed development:

- Three (3) ecosystem credits for PCT 835.

Plant Community Type 835 conforms to the Endangered Ecological Community (EEC) River-flat eucalypt forest on coastal floodplains of the NSW North Coast, Sydney Basin and South East Corner bioregions (RFEF). River-flat eucalypt forest is not listed as an 'SAIL entity' within the BioNet Threatened Biodiversity Data Collection (DPIE 2020b).

Fifteen (15) species credit species with suitable habitat within the Subject Land have not been surveyed for and were therefore assumed present. Targeted surveys will be required to be conducted within the DPIE approved survey periods to avoid purchasing offset credits for these species. The following species credits are required to be offset in order to mitigate the impacts upon these species as a result of the proposed development (pending the results of targeted surveys):

- Six (6) species credits for *Callocephalon fimbriatum* (Gang-gang Cockatoo);
- Three (3) species credits for *Haliaeetus leucogaster* (White-bellied Sea Eagle);
- Two (2) species credits for *Hieraetus morphnoides* (Little Eagle);
- Eleven (11) species credits for *Litoria aurea* (Green and Golden Bell Frog);
- Two (2) species credits for *Lophoictinia isura* (Square-tailed Kite);
- Eleven (11) species credits for *Myotis macropus* (Southern Myotis);
- Four (4) species credits for *Ninox connivens* (Barking Owl);
- Four (4) species credits for *Ninox strenua* (Powerful Owl);
- Two (2) species credits for *Pandion cristatus* (Eastern Osprey);

- Two (2) species credits for *Petauroides volans* (Greater Glider);
- Two (2) species credits for *Petaurus norfolcensis* (Squirrel Glider);
- Three (3) species credits for *Phascolarctos cinereus* (Koala)
- Sixteen (16) species credits for *Pilularia novae-hollandiae* (Austral Pillwort);
- Eleven (11) species credits for *Pomaderris brunnea* (Brown Pomaderris); and
- Four (4) species credits for *Tyto novaehollandiae* (Masked Owl).

Pilularia novae-hollandiae (Austral Pillwort) is listed as an 'SAll entity' within the BioNet Threatened Biodiversity Data Collection (DPIE 2021b). Due to the potential sensitivity of these threatened species to any impact, a determination of whether or not the proposed impacts are serious and irreversible has been undertaken in accordance with Section 9.1 of the BAM (DPIE 2020): 'Additional impact assessment provisions for threatened species or populations.'

In order to avoid and minimise potential impacts of the proposal on local biodiversity values, a series of mitigation and management measures have been identified, which are to be implemented as part of any Construction Environmental Management Plan (CEMP) produced for the site. This includes assigning a Project Ecologist to undertake an extensive pre-clearing survey, and to supervise the clearing of all vegetation in relation to the proposed development.

1. Introduction

1.1 Overview

Narla Environmental Pty Ltd (Narla) was commissioned by NBR Architecture c/o School's Infrastructure NSW ('the proponent') to prepare a Biodiversity Development Assessment Report (BDAR) to accompany a State Significant Development Application (SSDA) for the new Hawkesbury Centre of Excellence, located within the Western Sydney University Campus on Vines Drive, Richmond (Lot 2/DP1051798).

The BDAR will assess the biodiversity impacts of the proposed development in accordance with the requirements of the Biodiversity Conservation Act 2016 and Biodiversity Conservation Regulation 2017. The assessment has been completed in accordance with Appendix K of the BAM (DPIE 2020a).

1.2 The Proposed Development

The Proposed Site Plan prepared by NBR Architecture (**Figure 1**) shows the development of nine (9) new buildings to be utilised for administration, learning, dining, temporary accommodation, farming and Aboriginal Enterprise. It also shows the establishment of three (3) new dams, as well as agricultural plots, an orchard, a village green and areas of hardstand including driveways, carparks and footpaths. The demolition plan prepared by NBR Architecture (**Figure 2**) also shows areas that require soil disposal.

The proposed development will encompass a substantial area of the Lease Area with the exception of a small section in the north-west. The proposed development has been divided into three components, which are collectively referred to as the 'Subject Land' (**Figure 3**):

- Operational Footprint (3.67ha): the footprint of the proposed works, including buildings, dams, agricultural plots, orchard, village green, access roads and car parks, and pedestrian access (footpaths).
- Construction Footprint (1.07ha): additional land that is required for proposed stockpiling, soil remediation and/or additional vegetation removal to facilitate works. This area can also be used for temporary/ancillary construction facilities.
- Retained vegetation to be managed as an APZ (2.35ha): Vegetation within 50m of the proposed new buildings which is to be retained and managed as an APZ (Bushfire Planning Australia 2021).

The Subject Land covers an area of approximately 7.09ha, which was mostly dominated by agricultural grassland. Scattered areas of trees exist within the Subject Land, including both native and exotic species. Most vegetation within the Subject Land will require removal to accommodate the proposed development, with the exception of the vegetation marked for retention (and to be managed as an APZ).

1.3 Site Location and Description

The Lease Area is situated within a vacant area of land within the Western Sydney University Hawkesbury Campus in the suburb of Richmond in the Hawkesbury Local Government Area (LGA; **Figure 4**). The Lease Area is also located within the boundaries of the Deerubbin Local Aboriginal Land Council (Deerubbin LALC). It has an area of approximately 11.37ha, has frontage to Vines Drive to the north, and is bounded by similar agricultural landscapes to the east, south and west. The Lease Area is comprised of grass pastures with some remnant native and exotic trees.

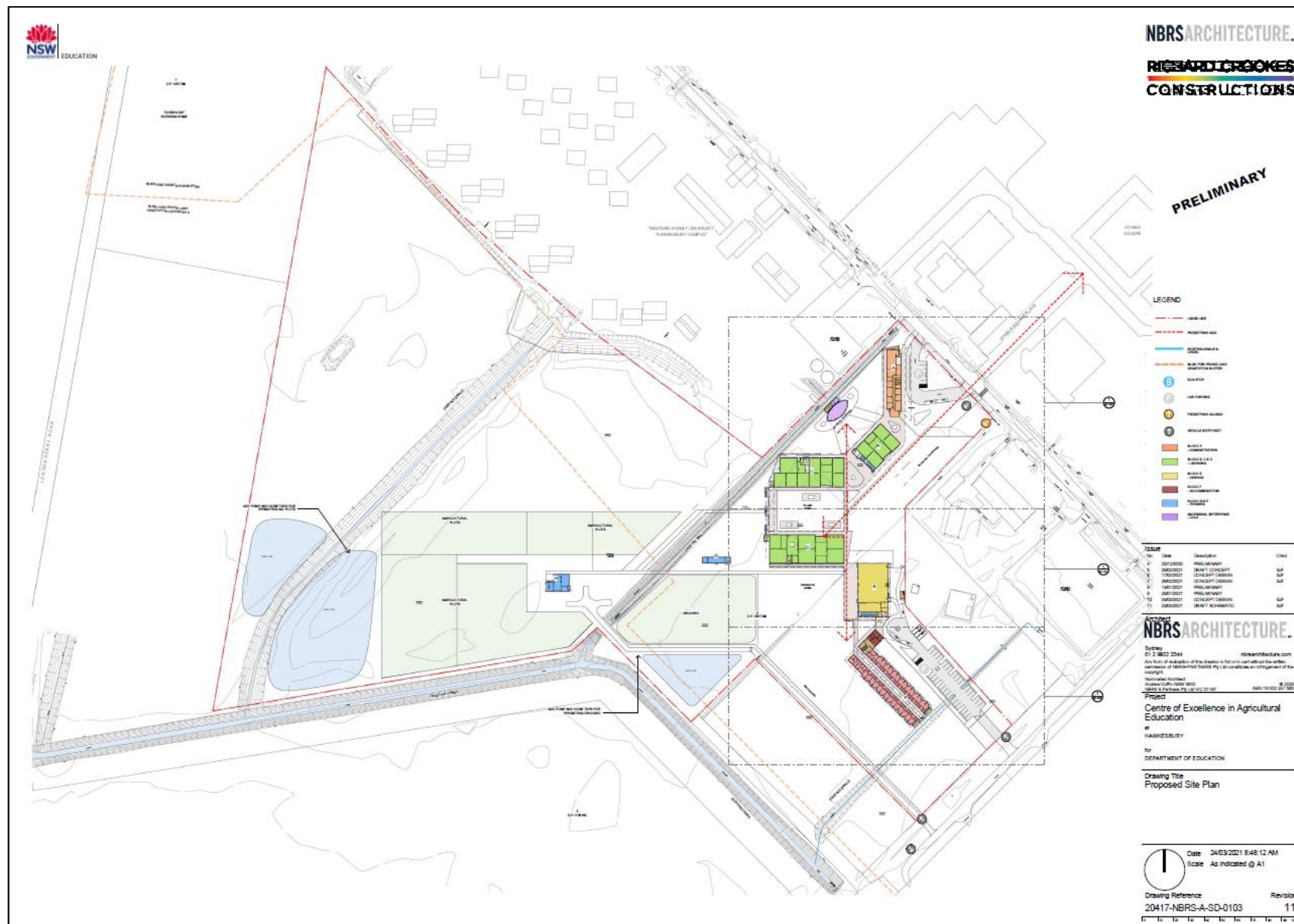




Figure 3. The components of the Subject Land.

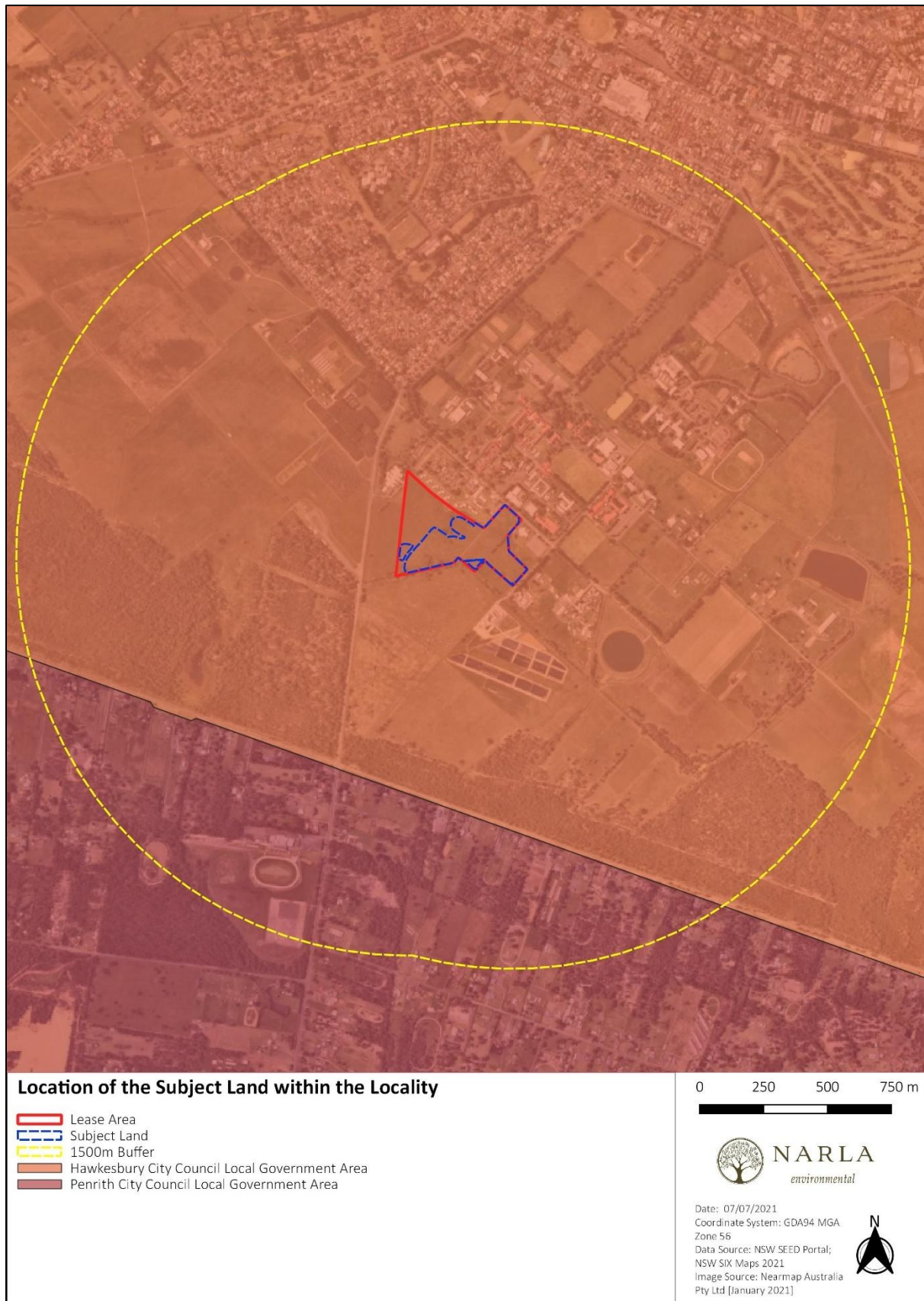


Figure 4. The location of the Subject Land within the locality.

1.4 Sources of Information Used

A thorough literature review was undertaken to gain an insight into the ecology and applicable legislation within the locality and the Hawkesbury City Council LGA, including:

- Relevant State and Commonwealth Databases & Datasets:
 - NSW BioNet. The website of the Atlas of NSW Wildlife (DPIE 2020b);
 - NSW BioNet. Threatened Biodiversity Data Collection (DPIE 2020c);
 - NSW BioNet. Vegetation Classification System (DPIE 2020d); and
 - NSW Government Spatial Services: Six Maps Clip & Ship.
- Vegetation and Soil Mapping:
 - 'The Remnant Vegetation of the western Cumberland subregion' 2013 Update. VIS_ID 4207 (OEH 2013).
 - Soil Landscapes of the Penrith 1:100 000 Sheet (Bannerman & Hazelton 1990).
- NSW State Guidelines:
 - Biodiversity Assessment Method (DPIE 2020a);
 - Guidance to assist a decision-maker to determine a serious and irreversible impact (DPIE 2019a);
 - Biodiversity Assessment Method Calculator Version 1.3.0.00 (DPIE 2020e);
 - Biodiversity Offsets and Agreement Management System (BOAMS) ;
 - Surveying threatened plants and their habitats - NSW survey guide for the Biodiversity Assessment Method (DPIE 2020f); and
 - Threatened Species Survey and Assessment: Guidelines for developments and activities. Working Draft (DEC 2004)
- Council Documents:
 - Hawkesbury Development Control Plan (DCP) 2002; and
 - Hawkesbury Local Environment Plan (LEP) 2012.

Preparation of this BDAR also involved the review of the following accompanying project documents:

- NBR Architecture (2021a) Proposed Site Plan Rev 11;
- NBR Architecture (2021b) Demolition Plan Rev 5;
- Sturt Noble Arboriculture (2021) Arboricultural Impact Assessment Report; and
- Bushfire Planning Australia (2021) consultation.

These sources were used to gain an understanding of the natural environment and ecology of the Subject Land and its surrounds. Searches using NSW Wildlife Atlas (BioNet) were conducted to identify current threatened flora and fauna records within and surrounding the Subject Land. These data were used to assist in establishing the presence or likelihood of any biodiversity values as occurring on, or adjacent to, the Subject Land, and helped inform our Ecologist on what to look for during the site assessment.

1.5 Aim and Approach

This report has been prepared in accordance with the BAM (DPIE 2020a) and aims to:

- Describe the biodiversity values present within the Subject Land, including the extent of native vegetation, vegetation integrity and the presence of Threatened Ecological Communities (TECs);
- Determine the habitat suitability within the Subject Land for candidate threatened species;
- Prepare an impact assessment in regard to potential impacts of the proposed development on biodiversity values, including potential prescribed impacts and SAIIs within the Subject Land;
- Discuss and recommend efforts to avoid and minimise impacts on biodiversity values; and
- Calculate the biodiversity credits (i.e., ecosystem credits and species credits) that measure potential impacts of the development on biodiversity values. This calculation will inform the decision maker as to the number and class of offset credits required to be purchased and retired as a result of the proposed development.

2. Landscape Context

2.1 IBRA Bioregion and Subregion

The Subject Land occurs within the 'Cumberland' Interim Biogeographic Regionalisation for Australia 7 (IBRA7) Subregion, which is part of the 'Sydney Basin' IBRA7 Bioregion (**Figure 5**).

2.2 Mitchell Landscapes

'NSW Landscapes Mapping: Background and Methodology' (Mitchell 2002) groups ecosystems into meso-ecosystems representing larger natural entities based on topography and geology. The naming of ecosystems and meso-ecosystems was standardised so that each name provided location information and a meaningful descriptive landscape term.

The Subject Land occurs within the 'Hawkesbury – Nepean Terrace Gravels' Mitchell Landscape Ecosystem (**Figure 6**). This landscape is characterised by three levels of river terrace dating into the Tertiary. General elevation 20 to 45m, local relief 10m. Planar, poorly drained terraces with harsh texture-contrast soils and heavy clays in swamps and cut-off meanders. In places deep sands of crevasse splays support scribbly gum (*Eucalyptus sclerophylla*), narrow-leaved apple (*Angophora bakeri*) and old man banksia (*Banksia serrata*) on podsol with adjacent sedgeland. Most clay-based soils (harsh texture-contrast profiles) are very gravelly and carry broad-leaved ironbark (*Eucalyptus fibrosa* ssp. *fibrosa*) and narrow-leaved ironbark (*Eucalyptus crebra*), grey box (*Eucalyptus moluccana*), paperbarks (*Melaleuca* sp.) and drooping red gum (*Eucalyptus parramattensis*). Several vegetation communities are now rare especially that on the Pliocene/Pleistocene sand body with podsol soil profiles at Agnes Banks.

2.3 Topography, Geology and Soils

The Subject Land is generally flat with an elevation ranging between 23m and 25m above sea level (Google Earth 2021). The Subject Land is mapped as occurring on the Berkshire Park soil landscape, which is the result of three depositional phases of Tertiary alluvial/colluvial origin. The lowest deposit is the St Marys formation. This is overlain by the Rickerby's Creek gravel formation, which is of varying thickness and in turn is topped by the Londonderry Clay formation. All of these formations are derived from sandstone and clay. Erosion of the surface has led to exposure of all three formations in different locations.

The Subject Land did not contain any areas of geological significance, such as karsts, caves, cliffs or crevices. The Subject Land and wider locality (1500m buffer) are not mapped as occurring on acid sulfate soils nor mapped as having risk/probability of exhibiting occurrence of acid sulfate soils.

2.4 Hydrology

No mapped watercourses were located within the Subject Land however three (3) unmapped artificial swales and one dam were identified either within the Subject Land or in the broader Lease Area. (**Figure 7**). All (3) three swales and the dam will be retained by the proposed development.

A number of mapped watercourses also occur within the 1500m buffer surrounding the Subject Land, ranging from 1st to 3rd order streams (**Figure 8**). These watercourses appear to have been historically altered due to the rural nature of the landscape and eventually drain into the Hawkesbury River.

The Subject Land does not contain any areas of native vegetation identified as 'Coastal Wetlands' or 'Littoral Rainforest'. However, one area mapped as 'Proximity to Coastal Wetlands and Coastal Environmental Areas' as

per the State Environmental Planning Policy (Coastal Management) 2018, was mapped within the immediate surrounds of the Subject Land (**Figure 9**).

2.5 Native Vegetation Cover and Connectivity

Native vegetation cover and connectivity have been assessed in accordance with Section 3.2 of the BAM (DPIE 2020a). The native vegetation cover will be used to assess the habitat suitability of the Subject Land for threatened species. Areas of connectivity will determine the extent of habitat that may facilitate the movement of threatened species across their range. A 1500m buffer around the boundary of the Subject Land was calculated to determine the extent of native vegetation and habitat connectivity. Native vegetation covered approximately 737ha within the buffer circle (total area = 916ha) and was assigned to the >70% class.

Large areas of connectivity that may facilitate the movement of threatened species were evident within the 1500m surrounding the Subject Land (**Figure 10**). This included large areas to the east, west and south of the Subject Land, and smaller pockets to the north. Due to native species being found within the grassland areas within the Subject Land, all grassland areas were included as native species presence could not be ruled out.

2.6 Areas of Outstanding Biodiversity Value

No Areas of Outstanding Biodiversity Value occur on the Subject Land or surrounding area.

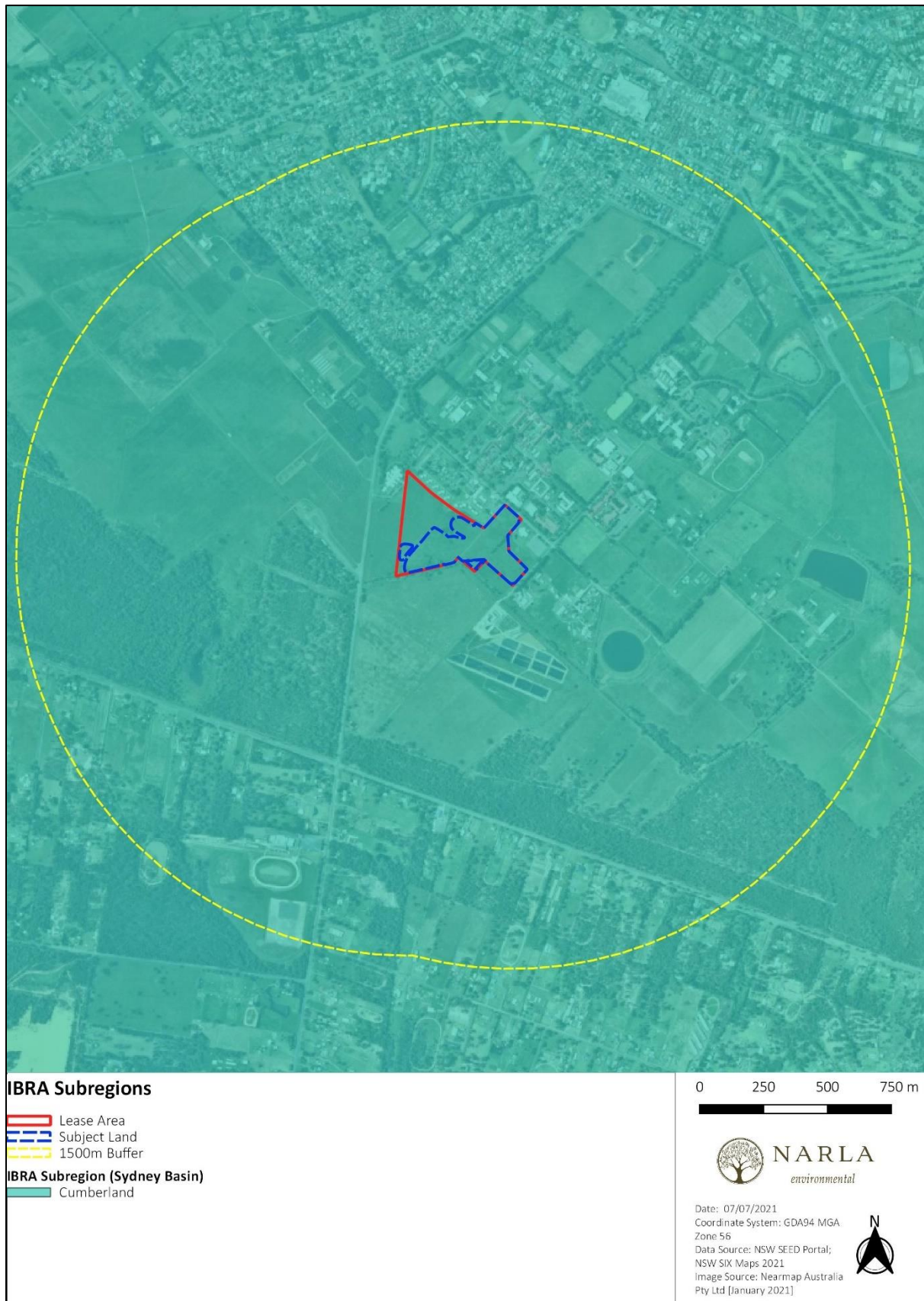


Figure 5. IBRA Bioregion and Subregion of the Subject Property and Subject Land, and within a 1500m buffer.

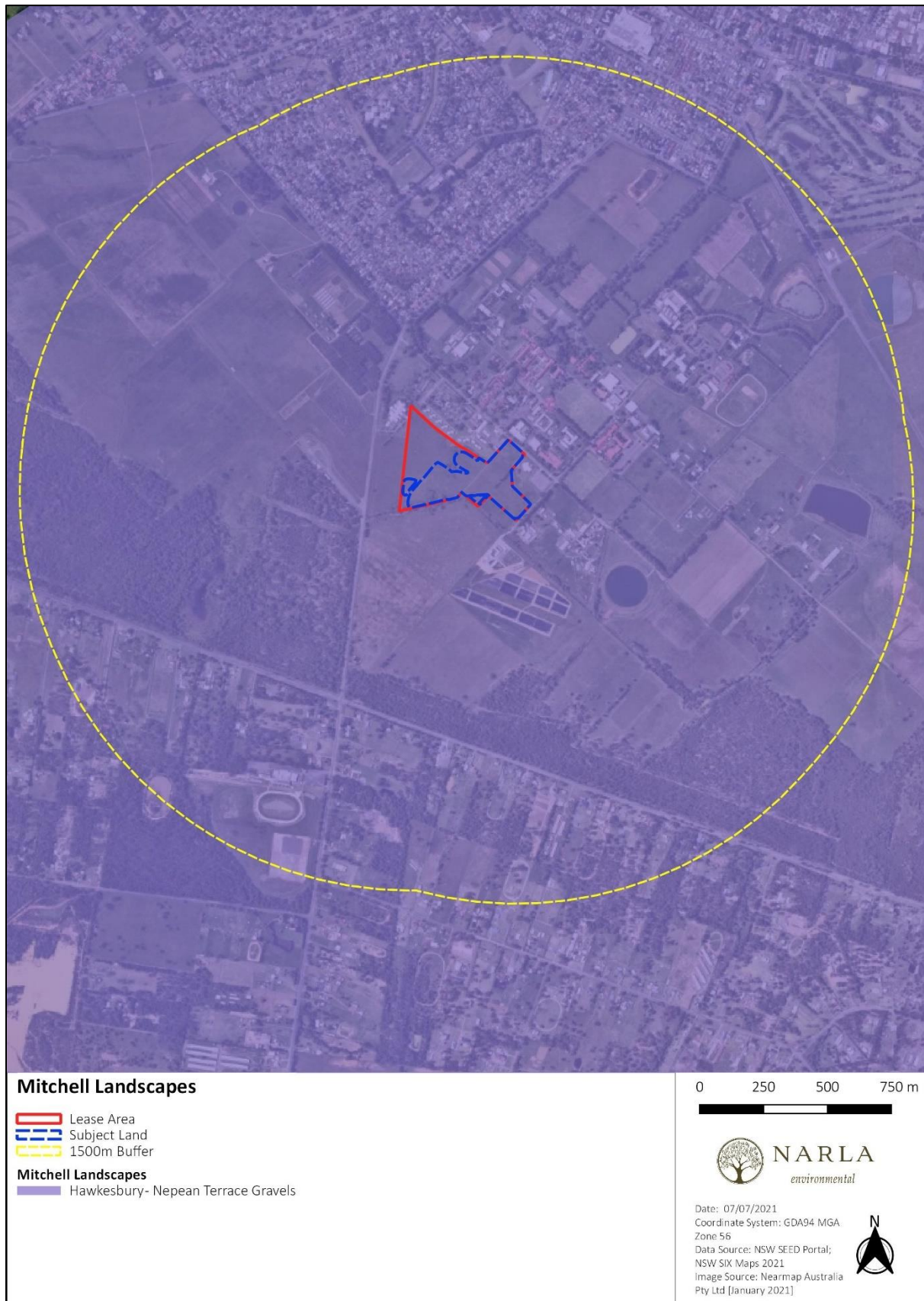


Figure 6. Mitchell Landscapes of the Subject Property and Subject Land, and within a 1500m buffer.



Figure 7. Water features occurring within the Lease Area.



Figure 8. Rivers and streams (with associated riparian buffers) occurring within the 1500m buffer.



Figure 9. Areas mapped under the Coastal Management SEPP in relation to the Subject Land and general locality.



Figure 10. The extent of native vegetation and habitat connectivity within the 1500m buffer.

3. Native Vegetation

3.1 Plant Community Types (PCTs) Identified within the Subject Land

3.1.1 Historically Mapped Vegetation

The vegetation within the Subject Land has not been included in the 'Remnant Vegetation of the western Cumberland subregion, 2013 Update' (OEH 2013), and is mapped as containing cleared land by the 'Native vegetation of southeast NSW: a revised classification and map for the coast and eastern tablelands'.

3.1.2 Plant Community Type Selection Process

Field surveys conducted by experienced Narla confirmed that one (1) native vegetation community occurred within the Subject Land. Plant Community Type selection for this vegetation community was undertaken using information and databases provided in the BioNet Vegetation Classification System (DPIE 2020c). The following selection criteria were used in the PCT Filter Tool to develop the PCT shortlist:

- IBRA Bioregion: Sydney Basin
- IBRA Subregion: Cumberland Plain
- Dominant Species: *Eucalyptus tereticornis* and *Angophora subvelutina*

This process delivered a selection of seven (7) PCT's that occur within the Cumberland IBRA Subregion (and Sydney Basin Bioregion) that had one or more (out of two) of the observed dominant species (i.e., the highest potential of occurring within the Subject Land). The geographical distribution and landscape position of each shortlisted PCT was then compared against the location and landscape of the Subject Land, resulting in two (2) candidate PCTs (**Table 1**). The steps taken to justify the presence/absence of the candidate PCTs within the Subject Land are detailed in **Table 2**.

Table 1. Output from the PCT Filter Tool (DPIE 2020c) and subsequent shortlisting of candidate PCTs. Green shading indicates the PCTs from the output that occur within the distribution of the Subject Land.

Plant Community Type (PCT)	Subject Land within known distribution/landscape position?	No. of Matches	<i>Eucalyptus tereticornis</i>	<i>Angophora subvelutina</i>
PCT 774: Coast Banksia scrub on sand in the Elderslie area, Sydney Basin Bioregion	No. The Subject Land is not located in the Elderslie area.	1	-	x
PCT 830: Forest Red Gum - Grey Box shrubby woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion	No. The Subject Land is located on alluvial soils not shale. Furthermore, this PCT protected aspects on steeper shale hills and rises at higher elevations of the southern half of the Cumberland Plain.	1	x	-
PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of	Yes	2	x	x

Plant Community Type (PCT)	Subject Land within known distribution/landscape position?	No. of Matches	<i>Eucalyptus tereticornis</i>	<i>Angophora subvelutina</i>
the Cumberland Plain, Sydney Basin Bioregion				
PCT 849: Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	No. The Subject Land is located on alluvial soils not shale.	1	x	-
PCT 850: Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion	No. PCT 850 occupies higher elevations associated with the hills and rises south from Prospect. The Subject Land is north of Prospect.	1	x	-
PCT 1800: Swamp Oak open forest on riverflats of the Cumberland Plain and Hunter valley	Yes	1	x	-
PCT 1847: Smooth-barked Apple - Grey Gum - Forest Red Gum tall open forest on shale bands around the foreshores of the drowned river valleys of Sydney	No. PCT 1847 is found on localised patches of shale-enriched sandstone which occur on crests and slopes of minor sandstone scarps adjoining the coastal waterways of Sydney. The Subject Land is located on alluvial soils on a river flat landscape.	1	x	-

Table 2. PCT Selection Criteria. Green indicates the selected PCT.

Candidate PCT	Characteristics (DPIE 2020c)	Justification
PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion	Landscape position/ geology	Narla have assigned this PCT to the vegetation within the Subject Land as it fits with the landscape profile and comprises a number of diagnostic species. Furthermore, PCT 835 is described as having a canopy that includes one of either Rough-barked Apple (<i>Angophora floribunda</i>) or Broad-leaved Apple (<i>Angophora subvelutina</i>) and one or both of forest red gum (<i>Eucalyptus tereticornis</i>) and cabbage gum (<i>Eucalyptus amplifolia</i>). <i>Angophora subvelutina</i> and <i>Eucalyptus tereticornis</i> were both identified within the Subject Land.
	Occurs on stream banks and alluvial flats on the Cumberland Plain.	
	Characteristic canopy	
	<i>Eucalyptus tereticornis</i> , <i>Angophora floribunda</i> and <i>Eucalyptus amplifolia</i> subsp. <i>amplifolia</i> .	
	Characteristic mid-storey/ shrub	
	<i>Acacia parramattensis</i> , <i>Bursaria spinosa</i> subsp. <i>spinosa</i> and <i>Sigesbeckia orientalis</i> .	
PCT 1800: Swamp Oak open forest on riverflats of the Cumberland Plain and Hunter valley	Characteristic ground layer	Narla have NOT assigned this PCT to the vegetation within the Subject Land. Whilst it did fit with the landscape profile and comprised a number of diagnostic species, this community's distinguishing feature is the prominent stands of <i>Casuarina glauca</i> . Whilst <i>Casuarina glauca</i> 's were identified within the Subject Land, they only existed as historically planted barriers between paddocks. Based on their nature within the Subject Land and the lack of accounting for <i>Angophora subvelutina</i> , it was determined that this PCT could not be assigned as the 'Best Fit' for the vegetation within the Subject Land.
	<i>Microlaena stipoides</i> , <i>Oplismenus aemulus</i> , <i>Dichondra repens</i> , <i>Entolasia marginata</i> , <i>Solanum prinophyllum</i> , <i>Pratia purpurascens</i> , <i>Desmodium gunnii</i> , <i>Echinopogon ovatus</i> , <i>Commelina cyanea</i> and <i>Veronica plebeia</i> .	
	Landscape position/ geology	
	Found on the riverflats of the Cumberland Plain in western Sydney and in the Hunter Valley	
	Characteristic canopy	
	<i>Casuarina glauca</i> , <i>Eucalyptus moluccana</i> , <i>Angophora floribunda</i> , <i>Eucalyptus baueriana</i> and <i>Eucalyptus tereticornis</i> .	
	Characteristic mid-storey/ shrub	
	<i>Casuarina glauca</i> , <i>Bursaria spinosa</i> , <i>Melaleuca decora</i> , <i>Melaleuca nodosa</i> , <i>Melaleuca styphelioides</i> , <i>Acacia decurrens</i> , <i>Brunoniella australis</i> , <i>Dianella longifolia</i> , <i>Maytenus silvestris</i> , <i>Ozothamnus diosmifolius</i> and <i>Polyscias sambucifolia</i>	
	Characteristic ground layer	

Candidate PCT	Characteristics (DPIE 2020c)	Justification
	<i>Entolasia marginata</i> , <i>Einadia hastata</i> , <i>Microlaena stipoides</i> , <i>Echinopogon ovatus</i> , <i>Pratia purpurascens</i> , <i>Commelina cyanea</i> , <i>Senecio hispidulus</i> , <i>Veronica plebeia</i> , <i>Wahlenbergia gracilis</i>	

3.1.3 Final PCT and Vegetation Zone Selection

Field surveys conducted by Narla confirmed that one (1) PCT was identified within the Subject Land:

- PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion.

Three (3) vegetation zones were identified within the Subject Land that consisted of differing condition classes or vegetation types:

- Zone 1: PCT 835 – Grassland with exotic trees;
- Zone 2: PCT 835 – Grassland with planted *Casuarina glauca*; and
- Zone 3: PCT 835 – Remnant Canopy.

These vegetation zones are detailed in **Table 3**, and displayed in **Figure 11**.

Table 3. Vegetation zones identified within the Subject Land.

PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion			
Vegetation class	Coastal Floodplain Wetlands		
Total area within Subject Land	7.09		
Description in the VIS			
<p>Cumberland Riverflat Forest (Benson and Howell 1990) is an open eucalypt forest situated on broad alluvial flats of the Hawkesbury and Nepean river systems. It also forms narrower ribbons alongside streams and creeks that drain the Cumberland Plain. Typically, the canopy includes one of either rough-barked apple (<i>Angophora floribunda</i>) or broad-leaved apple (<i>Angophora subvelutina</i>) and one or both of forest red gum (<i>Eucalyptus tereticornis</i>) and cabbage gum (<i>Eucalyptus amplifolia</i>). However, there are a wide variety of other interesting eucalypts that are highly localised. On the Georges River near Bankstown and on Cabramatta and Prospect creeks blue box (<i>Eucalyptus baueriana</i>) is commonly encountered, sometimes as a smaller tree beneath the canopy. Further north and east Sydney blue gum (<i>Eucalyptus saligna</i>) and blackbutt (<i>Eucalyptus pilularis</i>) occurs. Near Hoxton Park spotted gum (<i>Corymbia maculata</i>) forms a minor component of the canopy.</p> <p>The understorey within this Riverflat forest is characterised by an occasional sparse to open small tree stratum of paperbark (<i>Melaleuca</i> spp.) and wattles (<i>Acacia</i> spp.). A sparse lower shrub layer features blackthorn (<i>Bursaria spinosa</i>) at most sites. The ground layer is characterised by an abundant cover of grasses with small herbs and ferns. Cumberland Riverflat Forest occurs at altitudes between one and 160 metres above sea level and with a mean annual rainfall of 750-1000 millimetres. Within the study area the largest remaining areas are situated on the Georges River. Highly disturbed examples occur on Prospect and Orphan School creeks.</p>			
Condition Class	Vegetation Zone 1: Grassland with exotic trees	Vegetation Zone 2: Grassland with planted <i>Casuarina glauca</i>	Vegetation Zone 3: Remnant Canopy
Extent within Subject Land (approximate)	6.75	0.12	0.22
Field survey effort	Three (3) BAM plot was established.	One (1) BAM plot was established.	One (1) BAM plots were established.
Description of vegetation	The vegetation within this zone was considerably degraded; characterised by no native canopy species or shrubs, and a mixed covering of native and exotic groundcovers, particularly grasses (Plate 1). <i>Cynodon dactylon</i> was the only reoccurring native species within the BAM plots. Exotic species	The vegetation within this zone consisted of a stand of historically planted <i>Casuarina glauca</i> , utilised as a paddock barrier (Plate 2). There was a complete lack of shrub species. The ground layer consisted of sporadic natives such as <i>Cynodon dactylon</i> , <i>Sporobolus creber</i> and <i>Juncus usitatus</i> . The	The vegetation within this zone was characterised by a remnant native canopy species (Plate 3). Native canopy species consisted of <i>Angophora subvelutina</i> and <i>Eucalyptus tereticornis</i> . No native shrub species were located however, the ground layer was comprised of select

PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion

	such as <i>Paspalum dilatatum</i> , <i>Eragrostis curvula</i> , <i>Setaria parviflora</i> and the priority weed <i>Senecio madagascariensis</i> were dominant. The zone also contained scattered exotic trees, including <i>Pinus radiata</i> and <i>Pyrus ussuriensis</i> .	remained of the vegetation was dominated by exotics including <i>Eragrostis curvula</i> , <i>Cenchrus clandestinus</i> , <i>Paspalum dilatatum</i> and <i>Setaria parviflora</i> .	native species, including <i>Cynodon dactylon</i> , <i>Einadia hastata</i> <i>Microlaena stipoides</i> , <i>Commelina cyanea</i> and <i>Dysphania pumilio</i> . Exotic species were also prevalent in this zone and consisted of <i>Bidens subalternans</i> , <i>Sida rhombifolia</i> , <i>Cinnamomum camphora</i> , <i>Cenchrus clandestinus</i> and <i>Chloris gayana</i> .
Structure of vegetation	No native trees or shrubs were present within the vegetation zone. However, native ground covers were moderate, with native grasses accounting for an average of 54% groundcover across the zone. Other native features were mostly absent with only 0.1% forb and 0% other and ferns. The zone contained no tree stem sizes, leaf litter, hollow bearing trees or fallen logs.	A thin layer of canopy cover was evident within the BAM plot, with native trees totalling 15% cover. Shrub cover was absent. A native groundcover was present including 20.2% grass, 0% forbs, others and ferns. Leaf litter was low accounting for only 1% and no fallen logs were recorded. The BAM plot contained a low diversity of tree stem sizes, with tree stems recorded in just three (3) DBH classes. Regeneration stems were present however no large trees and no hollow bearing trees were present within the BAM plot.	A low- canopy cover was evident within the BAM plot, with native trees totalling 6% cover. Shrub cover was absent. A moderate native groundcover was present, including 10.3% grass, 9% forb and 0% other and fern. Leaf litter cover was low (7%) and no fallen logs were recorded. The BAM plot contained a low diversity of tree stem sizes, with tree stems recorded in three (3) DBH classes, including one (1) large tree (>50cm DBH). No regenerating stems were recorded however, two (2) hollow bearing trees were identified within the BAM plot.
Scientific Reference from VIS (DPIE 2020c)	Tindall, D., Pennay, C., Tozer, M., Turner, K. and Keith, D., 2004, Native vegetation map report series No. 4. The Araluen, Batemans Bay, Braidwood, Burragorang, Goulburn, Jervis Bay, Katoomba, Kiama, Moss Vale, Penrith, Port Hacking, Sydney, Taralga; Tozer, M.G., Turner, K., Simpson, C., Keith, D.A., Beukers, P., MacKenzie, B., Tindall, D. & Pennay, C., 2010 Native vegetation of southeast NSW: a revised classification and map for the coast and eastern tablelands. Version 1.0; OEH (2013) The Native Vegetation of the Sydney Metropolitan Area Version 2.0 NSW Office of Environment and Heritage Sydney;		

PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion	
TEC Status (BC Act 2016 and EPBC Act 1999)	<p>Conforms to the BC Act listed EEC River-flat Eucalypt Forest on coastal floodplains of the NSW North Coast, Sydney Basin and South East Corner Bioregions (see Section 3.1.4).</p> <p>Does not conform to the EPBC Act listed CEEC Coastal Floodplain Eucalypt Forest of Eastern Australia (see Section 3.1.4).</p>
TEC area (ha)	7.09ha
Estimate of percent cleared value of PCT in the major catchment area	93%



Plate 1. Representative photo of Vegetation Zone 1.



Plate 2. Representative photo of Vegetation Zone 2 within the Subject Land.



Plate 3. Representative photo of Vegetation Zone 3 (Regrowth) within the Subject Land.

3.1.4 Threatened Ecological Communities

3.1.4.1 Biodiversity Conservation Act 2016

The native vegetation within the Subject Land conforms to the BC Act listed EEC River-flat Eucalypt Forest on coastal floodplains of the NSW North Coast, Sydney Basin and South East Corner Bioregions (RFEF; **Figure 12**). This was determined by a comprehensive desktop assessment that identified the typical RFEF landscape attributes within the Subject Land, in conjunction with a site visit that found a suite of characteristic RFEF species that were in line with the 'Identification Guidelines for Endangered Ecological Communities: Riverflat Eucalypt Forest on Coastal Floodplains' (DECC 2007).

3.1.4.2 Commonwealth Environment Protection and Biodiversity Conservation Act 1999

The native vegetation within the Subject Land does not conform to the EPBC Act 1999 listed Coastal Floodplain Eucalypt Forest of Eastern Australia Critically Endangered Community. Although the vegetation within Zone 3 meets most of the key diagnostic characteristics as outlined in Conservation Advice for this community, it does not meet the minimum condition threshold of:

- Category C2: $\geq 30\%$ of its total understorey vegetation cover is comprised of native species (exotic annuals are excluded from this assessment) AND Ground cover richness ≥ 4 native species per 0.04 ha sample plot, within a large (greater than 2ha) or contiguous patch (greater than 0.5ha within a patch of native vegetation greater than 5ha).

The native vegetation cover within Zone 3 only accounted for 19.3%, and was not part of a large or contiguous patch. Therefore, the vegetation within Zone 3 does not meet the minimum requirements to be protected under the EPBC Act.

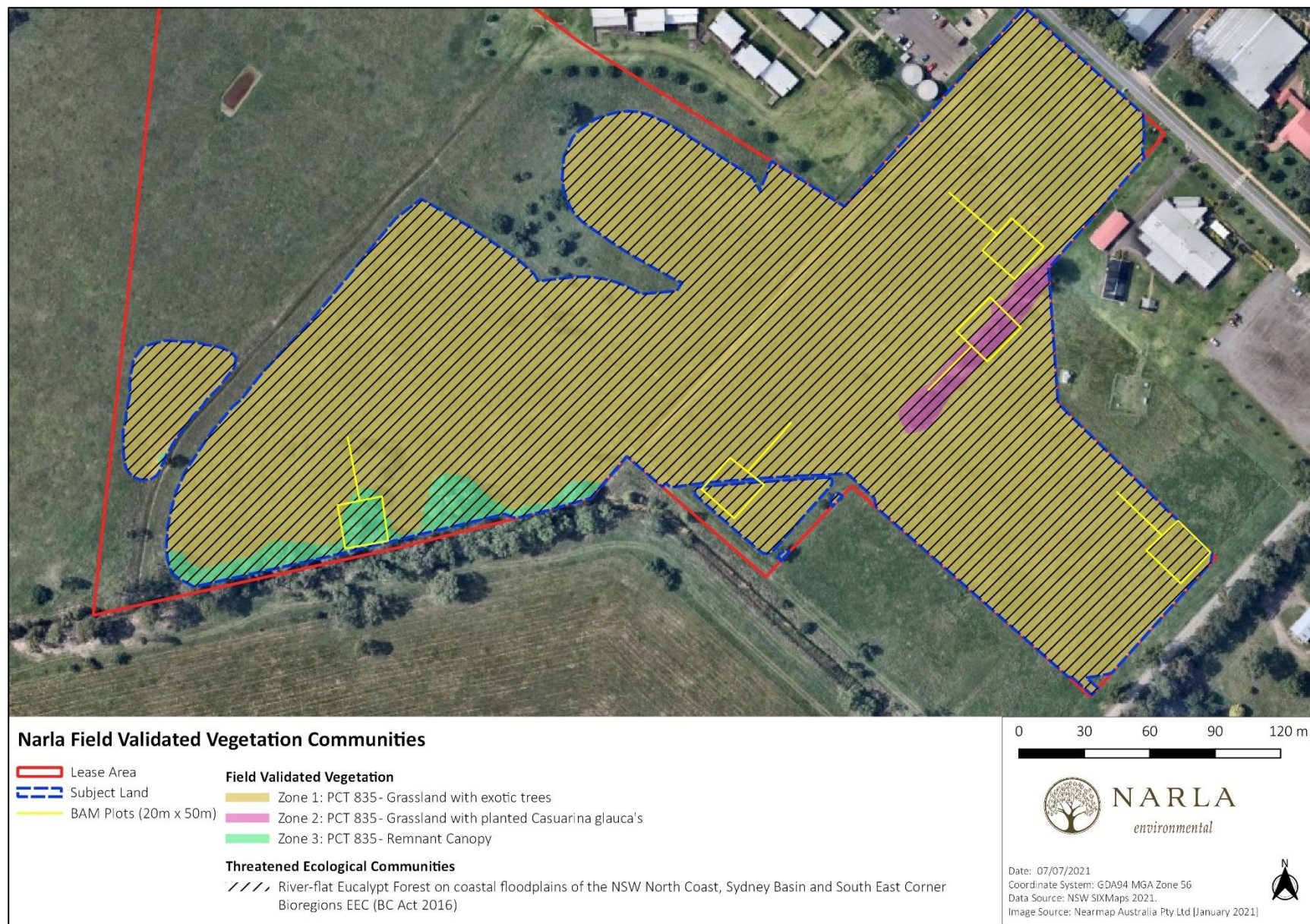


Figure 11. Narla field validated vegetation mapping and location of BAM plots within the Subject Land.

3.2 Assessing Patch Size

As defined by the BAM, a patch is an area of native vegetation that occurs on the Subject Land and includes native vegetation that has a gap of less than 100 m from the next area of native vegetation (or ≤ 30 m for non-woody ecosystems). A patch may extend onto adjoining land. For each vegetation zone, the assessor must determine the patch size in hectares and assign it to one of the following classes:

- <5 ha
- $5\text{--}<25$ ha
- $25\text{--}<100$ ha
- ≥ 100 ha.

The patch size class is used to assess habitat suitability on the Subject Land for threatened species. The assessor may assign more than one patch size class to the vegetation zone if both of the following apply:

- A vegetation zone comprises two or more discontinuous areas of native vegetation, and
- The areas of discontinuous native vegetation have more than one patch size class.

As areas outside of the Subject Property were not assessed as part of the scope of this assessment, the vegetation zones identified within the Subject Land were separated into the following categories to allow for aerial mapping of patch size within the broader area (**Figure 12**):

- Non woody Ecosystems:
 - Zone 1: PCT 835 – Grassland with exotic trees.
- Woody Ecosystems:
 - Zone 2: PCT 835 – Grassland with planted *Casuarina glauca*; and
 - Zone 3: PCT835 – Remnant Canopy

Table 4. Patch size classes of each PCT and associated vegetation zones.

Plant Community Type	Category	Vegetation Zone	Patch Size Class
PCT 835	Non-woody Ecosystems	Zone 1	>100 ha
PCT 835	Woody Ecosystems	Zone 2	<5 ha
PCT 835	Woody Ecosystems	Zone 3	>100 ha

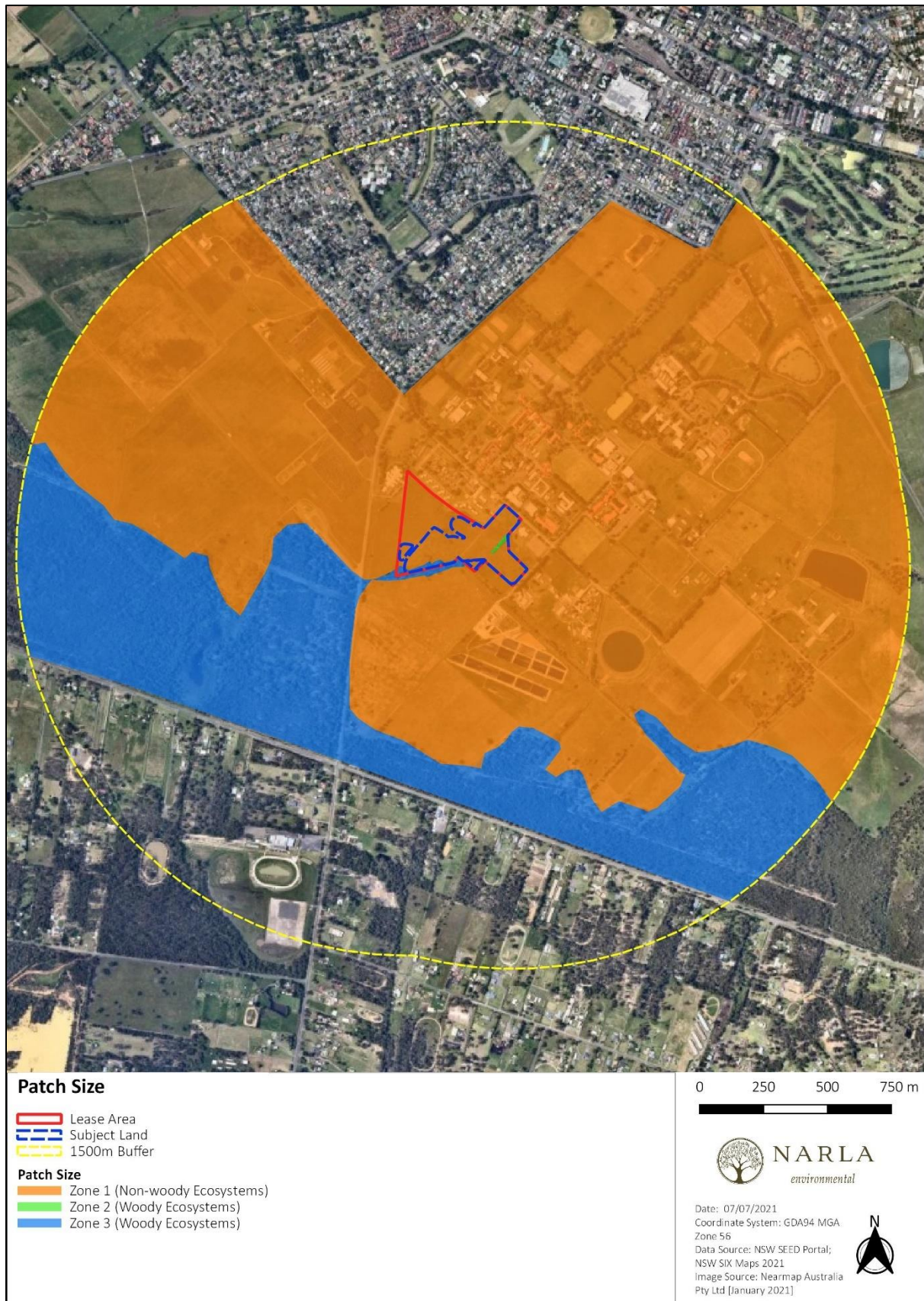


Figure 12. Patch size for each vegetation zone identified within the Subject Land.

3.3 Vegetation Integrity Survey (VIS) Plots

Six (6) BAM VIS Plots were established within the Subject Land. Plot data gathered for each attribute used to assess the function of the Subject Land vegetation is detailed in Appendix A. Vegetation Integrity (VI) Scores represented by existing vegetation within each vegetation zone is detailed in **Table 5**.

3.3.1 Determining future vegetation integrity scores

Most projects will result in complete clearing of vegetation and threatened species habitat within the development footprint. In this scenario, the assessor must assess the proposed future value of each of the VI attributes as zero in the BAMC. However, in circumstances where partial clearing of vegetation is proposed and remaining vegetation will be maintained, the assessor may determine that the future value of the relevant VI attributes are greater than zero (DPIE 2020a).

The Subject Land will be exposed to varying degrees of clearing, including full clearing within the proposed development footprint, and partial clearing within the APZ. Subsequently, each vegetation zone has been divided into the following management zones to account for the varying clearing levels (**Figure 13**):

- Vegetation Zone 1: Grassland with exotic trees:
 - Management Zone 1.1: Total Impact – this area will require the removal of all vegetation to allow for the proposed development.
 - Management Zone 1.2: APZ – this area is defined by the APZ within the vegetation zone that requires management to achieve IPA specifications.
- Vegetation Zone 2: Grassland with planted *Casuarina glauca*'s:
 - Management Zone 2.1: Total Impact – this area will require the removal of all vegetation to allow for the proposed development.
 - Management Zone 2.2: APZ – this area is defined by the APZ within the vegetation zone that requires management to achieve IPA specifications.
- Vegetation Zone 3: Remnant Canopy:
 - Management Zone 3: Total Impact – this area will require the removal of all vegetation to allow for the proposed development.

The attributes influencing future vegetation scores within each of these management zones are detailed in **Table 6**.



Figure 13. Management zones within the Subject Land.

Table 5. Vegetation integrity scores for each identified zone.

PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion											
Vegetation Zone	Management Zone	Area (ha)	Survey Effort	Composition Condition Score	Structure Condition Score	Function Condition Score	VI Score	Future VI Score	Change in VI Score	Total VI Loss	Hollow bearing trees
Zone 1 -Grassland with exotic trees	1.1 Total Impact	4.50	3 x 1000m ² (20m x 50m) VIS Plot	0.7	55.2	0	3.4	0	-3.4	-2.3	0
	1.2 APZ	2.24						3.4	0		
Zone 2 – Grassland with planted <i>Casuarina glauca's</i> .	2.1 Total Impact	0.04	1 x 1000m ² (20m x 50m) VIS Plot	10.6	26.8	28.8	20.2	0	-20.2	-9.6	0
	2.2 APZ	0.08						15.8	-4.4		
Zone 3 – Remnant Canopy	3 Total Impact	0.22	1 x 1000m ² (20m x 50m) VIS Plot	15.4	8.2	44.8	17.8	0	-17.8	-17.8	2

Table 6. Management Zones within the Subject Land, and relevant vegetation attributes (composition, structure and function) affecting future VI scores.

Vegetation Zone	Management Zone	Changes in current vegetation attributes	Vegetation attributes not changed	Future vegetation scores and justification
Zone 1 – PCT 835: Grassland with exotic trees	Zone 1.1 Total Impact	All vegetation will be removed	NA	<ul style="list-style-type: none"> All vegetation within the development footprint is required for removal to allow for the proposed development. Future composition, structure and function score is 0.
	Zone 1.2 APZ	Vegetation Composition		
		NA	<ul style="list-style-type: none"> Canopy, shrub, grass, forb, fern and other composition. 	<ul style="list-style-type: none"> Tree Composition = 0, Shrub composition = 0; Fern composition = 0, Other Composition = 0. <ul style="list-style-type: none"> No trees, shrubs, ferns or other were present within the BAM plots. Grass composition = 1; Forb composition = 0.3 <ul style="list-style-type: none"> Grasses and some forbs have remained viable within the zone even though it is currently heavily degraded. It is therefore expected that there will be no change in this viability when the vegetation is kept to a height of <100mm, and consequently no change in species composition.
		Vegetation Structure		
		NA	<ul style="list-style-type: none"> Canopy, shrub, grass, forb, fern and other structure. 	<ul style="list-style-type: none"> Tree structure = 0, Shrub structure = 0%; Fern structure = 0% and Other structure = 0% <ul style="list-style-type: none"> No trees, shrubs, ferns or other were present within the BAM plots. Grass cover = 53.7%; Forb cover = 0.1% <ul style="list-style-type: none"> Grasses and forbs have remained viable within the zone even though it is currently heavily degraded. It is therefore expected that there will be no change in this viability when the vegetation is kept to a height of <100mm, and consequently no change in species structure.
		Vegetation Function		
		NA	<ul style="list-style-type: none"> Regenerating stems. Large trees and stem size classes; 	<ul style="list-style-type: none"> No regenerating stems, trees of any size class, leaf litter or coarse wood debris were recorded within the BAM plots HTE cover = 31.6%:

Vegetation Zone	Management Zone	Changes in current vegetation attributes	Vegetation attributes not changed	Future vegetation scores and justification
			<ul style="list-style-type: none"> Leaf litter and coarse woody debris. HTE cover. 	<ul style="list-style-type: none"> No reduction in HTE's is expected due to the degraded nature of the Subject Land and additional pressures from the proposed development.
Zone 2 – Grassland with planted <i>Casuarina glauca's</i>	Zone 2.1 Total Impact	All vegetation will be removed	NA	<ul style="list-style-type: none"> All vegetation within the development footprint is required for removal to allow for the proposed development. Future composition, structure and function score is 0.
	Zone 2.2 APZ	Vegetation Composition		
		NA	<ul style="list-style-type: none"> Canopy, shrub, grass, forb, fern and other composition. 	<ul style="list-style-type: none"> Tree composition = 1. <ul style="list-style-type: none"> It is assumed that the strategic removal/trimming of canopy trees will allow for the retention of all canopy species (i.e. retain current species diversity). Shrub composition = 0; Forbs = 0, Fern composition = 0, Other = 0. <ul style="list-style-type: none"> No shrubs, forbs, ferns or other were present within the BAM plot. Grass composition = 3 <ul style="list-style-type: none"> Grasses have remained viable within the zone even though it is currently heavily grazed. It is therefore expected that there will be no change in this viability when the vegetation is kept to a height of <100mm, and consequently no change in species composition.
		Vegetation Structure		
		NA	<ul style="list-style-type: none"> Canopy, shrub, grass, forb, fern and other structure. 	<ul style="list-style-type: none"> Tree structure maintained at 15% cover <ul style="list-style-type: none"> Tree canopy cover should be no more than 15% at maturity as per RFS (2019) Shrub structure = 0%; forb structure = 0, fern structure = 0% and other structure = 0% <ul style="list-style-type: none"> No shrubs, forbs, ferns or others were present within the BAM plot. Grass cover = 20.2% <ul style="list-style-type: none"> Grasses have remained viable within the zone even though it is currently heavily disturbed. It is therefore expected that there will

Vegetation Zone	Management Zone	Changes in current vegetation attributes	Vegetation attributes not changed	Future vegetation scores and justification
				be no change in this viability when the vegetation is kept to a height of <100mm, and consequently no change in species structure.
		Vegetation Function		
		<ul style="list-style-type: none"> Removal of regenerating stems. Removal of all leaf litter. 	<ul style="list-style-type: none"> Large trees and stem size classes; Coarse woody debris HTE cover. 	<ul style="list-style-type: none"> Regenerating stems = Absent: <ul style="list-style-type: none"> Regenerating stems will not remain viable as the groundcover is maintained to a height of <100mm. Litter cover = 0% <ul style="list-style-type: none"> Leaves and vegetation debris require complete removal from the IPA. No large trees or coarse woody debris were recorded within the BAM plots; Stem size classes = 3: <ul style="list-style-type: none"> It is assumed that the strategic removal/trimming of canopy trees will allow for the retention of all stem size classes (including large trees) whilst maintaining canopy cover to <15%. HTE cover = 46.2%: <ul style="list-style-type: none"> No reduction in HTE's is expected due to the degraded nature of the Subject Land and additional pressures from the proposed development.
Zone 3 – PCT 835: Remnant canopy	Zone 3 Total Impact	All vegetation will be removed	NA	<ul style="list-style-type: none"> All vegetation within the development footprint is required for removal to allow for the proposed development. Future composition, structure and function score is 0.

4. Threatened Species

4.1 Candidate Ecosystem Credit Species

Ecosystem credit species associated with the Subject Land are listed below in **Table 7**. No species predicted by the BAM calculator as potential ecosystem credits were excluded from the assessment due to habitat constraints.

Table 7. Candidate ecosystem credits predicted to occur within the Subject Land.

Scientific Name	BC Act Status	Excluded from Assessment	Reason for Exclusion from Assessment
<i>Anthochaera phrygia</i> Regent Honeyeater (Foraging)	Critically Endangered	No	-
<i>Artamus cyanopterus cyanopterus</i> Dusky Woodswallow	Vulnerable	No	-
<i>Botaurus poiciloptilus</i> Australasian Bittern	Endangered	No	-
<i>Callocephalon fimbriatum</i> Gang-gang Cockatoo (Foraging)	Vulnerable	No	-
<i>Chthonicola sagittata</i> Speckled Warbler	Vulnerable	No	-
<i>Climacteris picumnus victoriae</i> Brown Treecreeper (eastern subspecies)	Vulnerable	No	-
<i>Daphoenositta chrysoptera</i> Varied Sittella	Vulnerable	No	-
<i>Dasyurus maculatus</i> Spotted-tailed Quoll	Vulnerable	No	-
<i>Falsistrellus tasmaniensis</i> Eastern False Pipistrelle	Vulnerable	No	-
<i>Glossopsitta pusilla</i> Little Lorieet	Vulnerable	No	-
<i>Grantiella picta</i> Painted Honeyeater	Vulnerable	No	-
<i>Haliaeetus leucogaster</i> White-bellied Sea-Eagle (Foraging)	Vulnerable	No	-
<i>Hieraaetus morphnoides</i> Little Eagle (Foraging)	Vulnerable	No	-
<i>Ixobrychus flavicollis</i> Black Bittern	Vulnerable	No	-
<i>Lathamus discolor</i> Swift Parrot (Foraging)	Endangered	No	-
<i>Lophoictinia isura</i> Square-tailed Kite (Foraging)	Vulnerable	No	-
<i>Melanodryas cucullata cucullata</i> Hooded Robin (south-eastern form)	Vulnerable	No	-
<i>Melithreptus gularis gularis</i> Black-chinned Honeyeater (eastern subspecies)	Vulnerable	No	-

Scientific Name	BC Act Status	Excluded from Assessment	Reason for Exclusion from Assessment
<i>Micronomus norfolkensis</i> Eastern Coastal Free-tailed Bat	Vulnerable	No	-
<i>Miniopterus australis</i> Little Bent-winged Bat (Foraging)	Vulnerable	No	-
<i>Miniopterus orianae oceanensis</i> Large Bent-winged bat (Foraging)	Vulnerable	No	-
<i>Neophema pulchella</i> Turquoise Parrot	Vulnerable	No	-
<i>Ninox connivens</i> Barking Owl (Foraging)	Vulnerable	No	-
<i>Ninox strenua</i> Powerful Owl (Foraging)	Vulnerable	No	-
<i>Pandion cristatus</i> Eastern Osprey (Foraging)	Vulnerable	No	-
<i>Petroica boodang</i> Scarlet Robin	Vulnerable	No	-
<i>Petroica phoenicea</i> Flame Robin	Vulnerable	No	-
<i>Petroica boodang</i> Scarlet Robin	Vulnerable	No	-
<i>Petroica phoenicea</i> Flame Robin	Vulnerable	No	-
<i>Phascolarctos cinereus</i> Koala (Foraging)	Vulnerable	No	-
<i>Pteropus poliocephalus</i> Grey-headed Flying-fox (Foraging)	Vulnerable	No	-
<i>Saccolaimus flaviventris</i> Yellow-bellied Sheathtail-bat	Vulnerable	No	-
<i>Scoteanax rueppellii</i> Greater Broad-nosed Bat	Vulnerable	No	-
<i>Stagonopleura guttata</i> Diamond Firetail	Vulnerable	No	-
<i>Tyto novaehollandiae</i> Masked Owl (Foraging)	Vulnerable	No	-

4.2 Candidate Species Credit Species Summary

This section provides a summary of the candidate species credit fauna and flora species for the Subject Land derived from BAMC (DPIE 2020d). A summary of the targeted survey effort applied to each species is provided along with the results of the survey effort, specifically whether or not the species credit needs to be offset through retiring of Biodiversity Offset Credits (Table 8; Table 9).

Table 8. Candidate Fauna Credit Species predicted to occur within the Subject Land.

Scientific Name	Included in Assessment?	Targeted Survey conducted?	Present within Subject Land?	Biodiversity Risk Weighting	Biodiversity Offset Credits Required?
<i>Anthochaera phrygia</i> Regent Honeyeater (Breeding)	This Subject Land is not located within any mapped areas of important habitat for this species. Therefore, it has been excluded from the assessment.	NA	NA	Very High - 3	No
<i>Burhinus grallarius</i> Bush Stone-curlew	This species requires abundant fallen/standing dead timber including logs. As no such habitat was present within the Subject Land, this species was excluded from the assessment.	NA	NA	High - 2	No
<i>Callocephalon fimbriatum</i> Gang-gang Cockatoo (Breeding)	This species nests in hollows that are 10cm in diameter or larger and at least 9m above the ground in eucalypts. As such habitat constraints are present within the Subject Land, this species was included in the assessment.	No	Assumed Present	High - 2	Yes
<i>Cercartetus nanus</i> Eastern Pygmy-possum	After carrying out a field assessment of the habitat constraints or microhabitats on the Subject Land, it was determined that the habitat is substantially degraded such that the species is unlikely to utilise the Subject Land. This species is found in a broad range of habitats including rainforest, sclerophyll forest, woodland and heath, feeding that banksias, eucalyptus and bottlebrushes. This species breeds in tree hollows and decorticated (shredded) bark. Due to the absence of a mid-stratum layer due to continued grazing, and the isolated nature of the paddock trees, it is highly unlikely this species will utilise the Subject Land. Therefore, this species was excluded from the assessment.	NA	NA	High - 2	No
<i>Chalinolobus dwyeri</i> Large-eared Pied Bat	This species is known to occur within two kilometres of rocky areas containing caves, overhangs, escarpments, outcrops, or crevices, or within two kilometres of old mines or tunnels.	NA	NA	Very High - 3	No

Scientific Name	Included in Assessment?	Targeted Survey conducted?	Present within Subject Land?	Biodiversity Risk Weighting	Biodiversity Offset Credits Required?
	Such geological features were not observed within or adjacent to the Subject Land. Furthermore, as the Subject Land and surrounds are located within a flat terrain with little topographical variation, it is highly unlikely such habitat features would occur within the area surrounding the Subject Land. As such, this species was excluded from the assessment.				
<i>Haliaeetus leucogaster</i> White-bellied Sea-Eagle (Breeding)	This species builds large stick nests in living or dead mature trees within suitable vegetation within 1km of rivers, lakes, large dams or creeks, wetlands and coastlines. As such habitat constraints are present, this species was included in the assessment	No	Assumed Present	High - 2	Yes
<i>Hieraaetus morphnoides</i> Little Eagle (Breeding)	This species nests in tall living trees within a remnant patch of native vegetation. As large trees are present within the Subject Land, this species was included in the assessment.	No	Assumed Present	Moderate - 1.5	Yes
<i>Lathamus discolor</i> Swift Parrot (Breeding)	No, the Subject Land is not included on the map of important areas for Swift Parrot.	NA	NA	Very High - 3	No
<i>Litoria aurea</i> Green and Golden Bell Frog	This species is known to occur within semi-permanent/ephemeral wet areas, and within 1km of wet areas (swamps and waterbodies). As a number of waterbodies are present within 1km of the Subject Land (including within the Subject Land), this species was included in the assessment.	No	Assumed Present	High - 2	Yes
<i>Lophoictinia isura</i> Square-tailed Kite (Breeding)	This species requires live, large old trees within vegetation for nesting. As large trees are present within the Subject Land, this species was included in the assessment.	No	Assumed Present	Moderate - 1.5	Yes

Scientific Name	Included in Assessment?	Targeted Survey conducted?	Present within Subject Land?	Biodiversity Risk Weighting	Biodiversity Offset Credits Required?
<i>Meridolum corneovirens</i> Cumberland Plain Land Snail	This species lives under the litter of bark, leaves and logs, or shelters in loose soil around grass clumps, often at the base of trees. As such habitat is present within the Subject Land this species was included in the assessment.	Yes	No	High - 2	No
<i>Miniopterus australis</i> Little Bent-winged Bat (Breeding)	This species is known to breed in caves, tunnels, mines and culverts. As such habitat constraints are not present within the Subject Land, this species was excluded from the assessment.	NA	NA	Very High - 3	No
<i>Miniopterus orianae oceanensis</i> Large Bent-winged Bat (Breeding)	This species is known to breed in caves, tunnels, mines and culverts. As such habitat constraints are not present within the Subject Land, this species was excluded from the assessment.	NA	NA	Very High - 3	No
<i>Myotis macropus</i> Southern Myotis	As the Subject Land occurs within 200m of a waterbody with pools/stretches of 3m or wider, this species was included in the assessment.	No	Assumed Present	High - 2	Yes
<i>Ninox connivens</i> Barking Owl (Breeding)	This species is known to breed in living or dead trees with hollows greater than 20cm diameter. A hollow bearing tree with a hollow greater than 20cm diameter was present within the Subject Land. This species was therefore included in the assessment.	No	Assumed Present	High - 2	Yes
<i>Ninox strenua</i> Powerful Owl (Breeding)	This species is known to breed in living or dead trees with hollows greater than 20cm diameter. A hollow bearing tree with a hollow greater than 20cm diameter was present within the Subject Land. This species was therefore included in the assessment.	No	Assumed Present	High - 2	Yes

Scientific Name	Included in Assessment?	Targeted Survey conducted?	Present within Subject Land?	Biodiversity Risk Weighting	Biodiversity Offset Credits Required?
<i>Pandion cristatus</i> Eastern Osprey (Breeding)	This species builds large stick nests in living or dead mature trees within suitable vegetation within 100m of a floodplain. As large trees are present and the Subject Land was located on a floodplain, this species was included in the assessment	No	Assumed Present	Moderate – 1.5	Yes
<i>Petauroides volans</i> Greater Glider	Suitable habitat for this species was present within the Subject Land, there this species was included in the assessment.	No	Assumed Present	High - 2	Yes
<i>Petaurus norfolcensis</i> Squirrel Glider	Suitable habitat for this species was present within the Subject Land, there this species was included in the assessment.	No	Assumed Present	High - 2	Yes
<i>Phascolarctos cinereus</i> Koala (Breeding)	Potential feed trees were present within the Subject Land therefore this species was included in the assessment.	No	Assumed Present	High - 2	Yes
<i>Pteropus poliocephalus</i> Grey-headed Flying-fox (Breeding)	This species is known to breed within breeding camps. As such habitat constraints are not present within the Subject Land, this species was excluded from the assessment.	NA	NA	High - 2	No
<i>Tyto novaehollandiae</i> Masked Owl (Breeding)	This species is known to breed in living or dead trees with hollows greater than 20cm diameter. A hollow bearing tree with a hollow greater than 20cm diameter was present within the Subject Land. This species was therefore included in the assessment.	No	Assumed Present	High - 2	Yes

Table 9. Candidate Flora Credit Species predicted to occur within the Subject Land.

Scientific Name	Included in Assessment?	Targeted Survey conducted?	Present within Subject Land?	Biodiversity Risk Weighting	Biodiversity Offset Credits Required?
<i>Callistemon linearifolius</i> Netted Bottle Brush	This species is known to grow in dry sclerophyll forests on the coast and adjacent ranges. As no such habitat is located within the Subject Land this species was excluded from the assessment.	NA	NA	Moderate – 1.5	No
<i>Cynanchum elegans</i> White-flowered Wax Plant	This species usually occurs on the edge of dry rainforest vegetation. Other associated vegetation types include littoral rainforest; Coastal Tea-tree <i>Leptospermum laevigatum</i> – Coastal Banksia <i>Banksia integrifolia</i> subsp. <i>integrifolia</i> coastal scrub; Forest Red Gum <i>Eucalyptus tereticornis</i> aligned open forest and woodland; Spotted Gum <i>Corymbia maculata</i> aligned open forest and woodland; and Bracelet Honey myrtle <i>Melaleuca armillaris</i> scrub to open scrub. As potential habitat was located within the Subject Land this species was included in the assessment	Yes	No	High - 2	No
<i>Eucalyptus benthamii</i> Camden White Gum	This species is known to occur on alluvial flats. As such habitat was present within the Subject Land this species was included in the assessment.	Yes	No	High - 2	No
<i>Hibbertia</i> sp. Bankstown	This species is currently only known from one population at Bankstown Airport, in the Bankstown LGA. As the Subject Land is not located within this LGA it is deemed highly unlikely that this species would be present. It has therefore been excluded from the assessment.	NA	NA	Very High - 3	No
<i>Marsdenia viridiflora</i> subsp. <i>viridiflora</i> - endangered population <i>Marsdenia viridiflora</i> R. Br. subsp. <i>viridiflora</i> population in the Bankstown, Blacktown, Camden, Campbelltown, Fairfield, Holroyd, Liverpool and Penrith local government areas	This population has a geographic limitation of the Blacktown, Camden, Campbelltown, Canterbury-Bankstown, Cumberland, Fairfield, Liverpool and Penrith LGAs. As the Subject Land is located outside of these LGAs this species has been excluded from the assessment.	NA	NA	High - 2	No
<i>Persicaria elatior</i> Tall Knotweed	This species is known to occur in semi-permanent/ephemeral wet areas or within 50m of swamps, waterbodies or wetlands. As such habitat is	Yes	No	High - 2	No

Scientific Name	Included in Assessment?	Targeted Survey conducted?	Present within Subject Land?	Biodiversity Risk Weighting	Biodiversity Offset Credits Required?
	present within the Subject Land, this species was included in the assessment.				
<i>Persoonia hirsuta</i> Hairy Geebung	This species is known to occur on sandy soils in dry sclerophyll open forest, woodland and heath on sandstone. As no such habitat was present within this Subject Land this species excluded from the assessment.	NA	NA	Very High - 3	No
<i>Pilularia novae-hollandiae</i> Austral Pillwort	This species grows in shallow swamps and waterways often among sedges and grasses. As such habitat was present within the Subject Land this species has been included in the assessment.	No	Assumed Present	Very High - 3	Yes
<i>Pomaderris brunnea</i> Brown Pomaderris	This species grows in moist woodland or forest on clay and alluvial soils of flood plains and creek lines. As such habitat was located within the Subject Land this species has been included in the assessment.	No	Assumed Present	High - 2	Yes
<i>Wahlenbergia multicaulis</i> - endangered population Tadgell's Bluebell in the local government areas of Auburn, Bankstown, Baulkham Hills, Canterbury, Hornsby, Parramatta and Strathfield	This endangered population occurs in the local government areas of Auburn, Bankstown, Baulkham Hills, Canterbury, Hornsby, Parramatta and Strathfield. As the Subject Land is located outside of these LGAs, this population has been excluded from the assessment.	NA	NA	High - 2	No

4.3 Targeted Species Credit Surveys

Targeted surveys were undertaken for a number of species credit species considered likely to have suitable habitat within the Subject Land. These surveys were implemented in accordance with Section 5.3 of the BAM and all relevant OEH and DPIE threatened species survey guidelines. Targeted surveys were undertaken by Narla Ecologist Chris Moore on the 17th of March 2021, who has undertaken hundreds of targeted surveys all across NSW.

Weather conditions taken from the nearest weather station (Richmond Station 067105) in the lead up and during the field survey are outlined in **Table 10**. Pre-survey weather conditions were generally conducive for identifying threatened species should they occur within the Subject Land. Rainfall in the week prior to the targeted flora surveys provided ideal conditions for the flowering and/or emergence of the targeted flora species. Such rainfall also allowed for optimal conditions for the emergence of shrubs and groundcovers within the Subject Land, which ensured maximum species diversity was observed during the site visit.

Table 10. Weather conditions taken from the nearest weather stations (Station number 067105) in the lead up and during the field survey (BOM 2021). Survey date is in bold.

Timing/activities	Date	Day	Temperature		Rainfall (mm)
			Min	Max	
Lead up to the survey	10/03/2021	Wednesday	19.2	27.7	1.6
	11/03/2021	Thursday	18.6	26.5	0
	12/03/2021	Friday	19.7	27.3	3.8
	13/03/2021	Saturday	17.4	33.4	0.2
	14/03/2021	Sunday	18.8	19.1	18.4
	15/03/2021	Monday	12.2	24.3	12.8
	16/03/2021	Tuesday	12.8	22.4	0
Site Assessment & Targeted Survey	17/03/2021	Wednesday	16.2	22.2	3.6

4.3.1 Fauna Species Credit Survey



A total of twenty-two (22) threatened fauna species were identified within the BAMC (DPIE 2020d) as having the potential to occur within the Subject Land. Fourteen (14) species were identified as having the potential to occur within the Subject Land due to suitable habitat. To determine whether these species credit species are present, or are likely to use suitable habitat on the Subject Land, the following was undertaken:

- Targeted fauna surveys were conducted for one (1) species within the DPIE endorsed survey period (**Table 11**). The targeted survey effort undertaken for these species is detailed in **Section 4.3.1.1**.
- Thirteen (13) species were assumed present as targeted surveys could not be conducted during DPIE endorsed survey periods (**Table 11**), or to the DPIE approved standard (i.e., spotlighting, camera traps etc).

The remaining eight (8) species were not surveyed for in accordance with BAM Section 5.2.3 (DPIE 2020a), due to the following reasons:

- The assessor determines that microhabitats required by a species are absent from the subject land (or specific vegetation zone). or
- The assessor determines that the habitat constraints or microhabitats are degraded to the point that the species is unlikely to use the subject land (or specific vegetation zones).

Table 11. Species credit fauna species requiring targeted surveys and DPIE endorsed survey periods.

Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Callocephalon fimbriatum</i> Gang-gang Cockatoo (Breeding) Assumed Present													
<i>Haliaeetus leucogaster</i> White-bellied Sea-Eagle (Breeding) Assumed Present	 <p>Photo from Bird Life Australia</p>												







Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Hieraaetus morphnoides</i> Little Eagle (Breeding) Assumed Present													



Photo by Leo Berzins



Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Litoria aurea</i> Green and Golden Bell Frog Assumed Present													
<i>Lophoictinia isura</i> Square-tailed Kite (Breeding) Assumed Present	 <p>Photo from eBird</p>												


Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Meridolum corneovirens</i> Cumberland Plain Land Snail				✓									
<i>Myotis macropus</i> Southern Myotis Assumed Present	 <p>Photo from allaboutbats.org.au</p>												

Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Ninox connivens</i> Barking Owl (Breeding) Assumed Present													
Photo from Bird Life Australia													

Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Ninox strenua</i> Powerful Owl (Breeding) Assumed Present													

Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Pandion cristatus</i> Eastern Osprey (Breeding) Assumed Present	 <p>Photo from Bird Life Australia</p>												
<i>Petauroides volans</i> Greater Glider	 <p>australannature.com © Pavel German</p>												

Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Petaurus norfolcensis</i> Squirrel Glider	 <p>Photo from Office of Environment and Heritage</p>												
<i>Phascolarctos cinereus</i> Koala (Breeding) Assumed Present	 <p>Photo from Office of Environment and Heritage</p>												

Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Tyto novaehollandiae</i> Masked Owl (Breeding) Assumed Present	 <p>Photo from eBird</p>												
Key		✓ = Surveyed			= Optimum Survey Period								

4.3.1.1 Targeted Fauna Survey Effort

Targeted surveys were undertaken for the following species credit species that were identified by the BAMC as having the potential to utilise the habitat within the Subject Land:

- *Meridolum corneovirens* (Cumberland Plain Land Snail)

Targeted surveys for these species were required to determine their presence or absence. The targeted survey effort undertaken for these species is detailed in **Table 12**.

Table 12. Targeted fauna survey effort undertaken within the Subject Land.


Target Species	Survey Technique	Survey Effort and Timing	Targeted Species Identified?
<i>Meridolum corneovirens</i> Cumberland Plain Land Snail	Habitat search	Thorough searches of potential habitat over the course of one (1) day. Habitat searches focused on areas of suitable habitat with ample leaf litter and debris.	No


4.3.2 Flora Species Credit Survey

A total of ten (10) threatened flora species were identified within the BAMC (DPIE 2020d) as having the potential to occur within the Subject Land. Of these species, five (5) were identified as having the potential to occur within the Subject Land due to suitable habitat and correction geographic distribution. To determine whether these species credit species were present, or were likely to use suitable habitat on the Subject Land, the following was undertaken:

- Targeted fauna surveys were conducted for three (3) species within the DPIE endorsed survey period (**Table 13**). The targeted surveys were undertaken for these species in accordance with the 'Surveying threatened plants and their habitats - NSW survey guide for the Biodiversity Assessment Method' (DPIE 2020e; **Figure 14**);
- Two (2) species were assumed present as targeted surveys could not be conducted during DPIE endorsed survey periods (**Table 13**).

Table 13. Species credit flora species requiring targeted surveys. Targeted surveys were conducted within DPIE endorsed survey periods.

Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Cynanchum elegans</i> White-flowered Wax Plant				✓									
<i>Eucalyptus benthamii</i> Camden White Gum				✓									
<i>Persicaria elatior</i> Tall Knotweed				✓									
<i>Pilularia novae-hollandiae</i> Austral Pillwort Assumed Present	 <p>Photo by Richard Hartland</p>												

Candidate Fauna Species	Representative Photo of Assumed Present Species	Survey Period (BAMC)											
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<i>Pomaderris brunnea</i> Brown Pomaderris Assumed Present	 <p>Photo by Greg Steenbeeke</p>												
Key		✓ = Surveyed						= Optimum Survey Period					

4.4 Species Polygons

According to the BAM (DPIE 2020a), where a species is assumed to be present on the Subject Land, the assessor may use:

- An expert report to determine the location and area of the species polygon. The expert report must be used to identify the area of habitat for the species, or for species assessed by count, to identify the likely location and estimated number of individuals, or
- The area supporting the habitat constraints relevant to the species in the vegetation zone(s) (e.g., small rocky outcrops) as the species polygon for species assessed by area, or
- The entire vegetation zone(s) the species is predicted to occur within as the species polygon for species assessed by area.

The species assumed to be present within the Subject Land have had the following species polygons assigned to them:

- *Collocephalon fimbriatum* (Gang-gang Cockatoo): the species polygon encompasses a radius of 200m around a potential nest tree (**Appendix B**).
- *Haliaeetus leucogaster* (White-bellied Sea Eagle): and the species polygon encompasses Vegetation Zone 2 and 3, as it comprises the habitat constraints of this species (i.e. tall trees for breeding; **Appendix C**).
- *Hieraaetus morphnoides* (Little Eagle): The species polygon encompasses Vegetation Zone 2 and 3, as it comprises the habitat constraints of this species (i.e. tall trees for breeding; **Appendix C**).
- *Litoria aurea* (Green and Golden Bell Frog): the species polygon encompasses the entire Subject Land as it is located within 1km of a waterbody (**Appendix D**).
- *Lophoictinia isura* (Square-tailed Kite): The species polygon encompasses Vegetation Zone 2 and 3, as it comprises the habitat constraints of this species (i.e. tall trees for breeding; **Appendix C**).
- *Myotis macropus* (Southern Myotis): the species polygon encompasses the entire Subject Land, as it occurs within a 200m buffer of waterbodies with pools/stretchers of 3m or wider (**Appendix E**).
- *Ninox connivens* (Barking Owl): the species polygon encompasses a radius of 100m around a potential nest tree (**Appendix F**).
- *Ninox strenua* (Powerful Owl): the species polygon encompasses a radius of 100m around a potential nest tree (**Appendix F**).
- *Pandion cristatus* (Eastern Osprey): The species polygon encompasses Vegetation Zone 2 and 3, as it comprises the habitat constraints of this species (i.e. tall trees for breeding; **Appendix C**).
- *Petauroides volans* (Greater Glider): The species polygon encompasses Vegetation Zone 3, as it provides the only suitable habitat for this species (Trees with hollows, and connectivity to other bushland; **Appendix I**);
- *Petaurus norfolcensis* (Squirrel Glider): The species polygon encompasses Vegetation Zone 3, as it provides the only suitable habitat for this species (Trees with hollows, and connectivity to other bushland; **Appendix I**);
- *Phascolarctos cinereus* (Koala): the species polygon encompasses Zone 2 and Zone 3, as it supports the habitat constraints of this species (**Appendix G**).
- *Pilularia novae-hollandiae* (Austral Pillwort): The species polygon encompasses all vegetation zones within the Subject Land, as this species has no specific habitat constraints (**Appendix H**).
- *Pomaderris brunnea* (Brown Pomaderris): The species polygon encompasses all vegetation zones within the Subject Land, as this species has no specific habitat constraints (**Appendix H**).
- *Tyto novaehollandiae* (Masked Owl): the species polygon encompasses a radius of 100m around a potential nest tree (**Appendix F**).

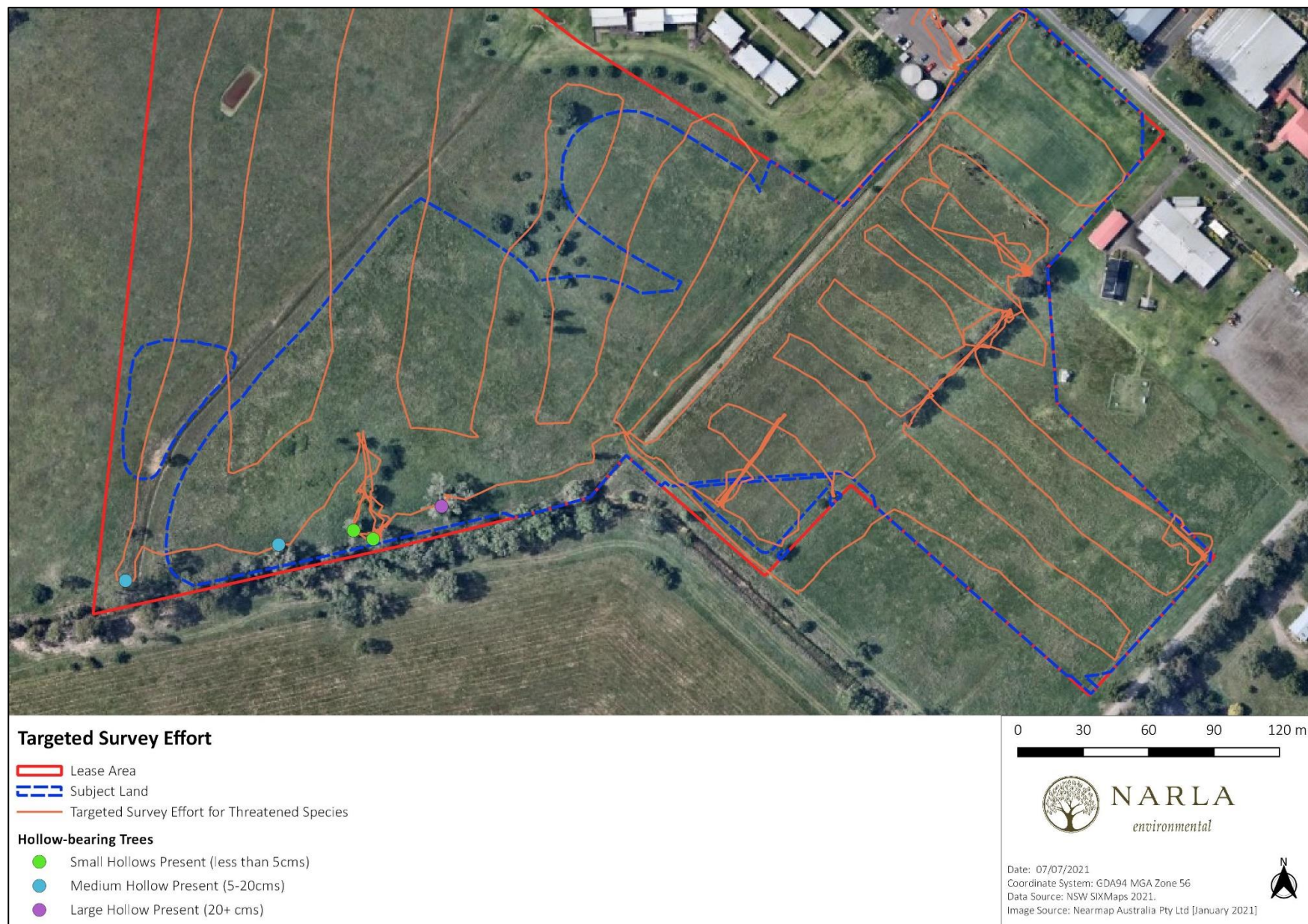


Figure 14. Targeted survey effort for species credit species within the Subject Land.

5. Prescribed Impacts

Certain projects may have impacts on biodiversity values in addition to, or instead of, impacts from clearing vegetation and/or loss of habitat. For many of these impacts, the biodiversity values may be difficult to quantify, replace or offset, making avoiding and minimising impacts critical. Prescribed biodiversity impacts require an assessment of the impacts of the subdivision on the habitat of threatened species or ecological communities. This is discussed in **Table 14**.

Table 14. Prescribed and uncertain impacts associated with the proposed development.

Will there be impacts on any of the following?	Yes/No	If Yes, Address all of the assessment questions from section 6 of the BAM
Habitat of threatened entities including: <ul style="list-style-type: none"> karst, caves, crevices, cliffs, rocks and other geological features of significance, or human-made structures, or non-native vegetation 	No	There are no karsts, caves, crevices, cliffs and other features of geological significance on or near the Subject Land. No human-made structures are proposed to be impacted by the development, and the only non-native vegetation to be impacted will be exotic ground covers that provides little to no habitat for threatened species.
On areas connecting threatened species habitat, such as movement corridors	No	It is unlikely the proposed development will interrupt connectivity for any threatened species, due to the already heavily degraded nature of the Subject Land.
That affect water quality, water bodies and hydrological processes that sustain threatened entities (including from subsidence or upsidence from underground mining)	No	It is unlikely that the proposed development of above ground solar panels would impact upon the water quality within the Subject Land, such that the community on site suffered.
On threatened and protected animals from turbine strikes from a wind farm	No	No wind farms are associated with the proposed development.

Will there be impacts on any of the following?	Yes/No	If Yes, Address all of the assessment questions from section 6 of the BAM
On threatened species or fauna that are part of a TEC from vehicle strikes.	No	The Subject Land has the potential to support threatened species. However, due to the nature of the proposed development, it is highly unlikely that vehicle strikes will be an issue given the slow speed requirements of vehicles within the property.

6. Avoid and Minimise Impacts

6.1 Impact Mitigation and Minimisation Measures

This section details the measures to be implemented before, during and post construction to avoid and minimise the impacts of the project (Table 15).

Table 15. Mitigation and minimisation of impacts associated with the proposed development.

Action	Outcome	Timing	Responsibility
Avoid and Minimise Impact - Project Location and Design	<p>The development has been strategically positioned to minimise impacts on native vegetation and habitat as much as possible. The proponent has primarily chosen areas of cleared land for the proposed development. This area has been historically cleared and continues to be exposed to varying disturbances, including weed invasion. The removal of vegetation within this area has largely been avoided, as the proposed development has been strategically placed to preferentially retain native trees where possible.</p> <p>Any temporary structures required for construction works should be located within areas of grassland that have minimal biodiversity values. This will avoid unnecessary impacts on native vegetation and habitat elsewhere within the Subject Property.</p>	Pre-construction phase	Proponent
Preparation of a Construction Environmental Management Plan (CEMP)	A CEMP will be required for the construction phase of the project, and will be prepared prior to issue of the Construction Certificate. The CEMP would include, as a minimum, industry-standard measures for the management of soil, surface water, weeds and pollutants, as well as site-specific measures, including the procedures outlined below. The proposed mitigation measures would include environmental safeguards for protection of neighbouring properties and nearby waterways in accordance with relevant policy documentation and Government guidelines. In order to address the potential impacts of the proposal on biodiversity, the mitigation and management measures outlined within this table would be implemented as part of the CEMP for the site.	Pre-construction phase	Proponent Construction Contractor

Action	Outcome	Timing	Responsibility
Tree Protections	<p>Australian Standard 4970 (2009) Protection of Trees on Development Sites (AS-4970) outlines that a Tree Protection Zone (TPZ) is the principal means of protecting trees on construction sites. It is an area isolated from construction disturbance so that the tree remains viable. Ideally, works should be avoided within the TPZ.</p> <p>A Minor Encroachment is less than 10% of the TPZ and is outside the SRZ. A Minor Encroachment is considered acceptable by AS-4970 when it is compensated for elsewhere and contiguous within the TPZ.</p> <p>A Major Encroachment is greater than 10% of the TPZ or inside the SRZ. Major Encroachments generally require root investigations undertaken by non-destructive methods or the use of tree sensitive construction methods.</p>	Pre-construction phase	Proponent Arborist
Assigning a Project Ecologist for vegetation clearing	<p>Prior to construction, the applicant should commission the services of a qualified and experienced Ecologist Consultant (minimum 3 years' experience) with a minimum tertiary degree in Science, Conservation, Biology, Ecology, Natural Resource Management, Environmental Science or Environmental Management. The Ecologist must be licensed with a current Department of Primary Industries Animal Research Authority permit and New South Wales Scientific License issued under the BC Act. The Ecologist will be commissioned to:</p> <ul style="list-style-type: none"> Undertake any required targeted searches for threatened flora prior to vegetation clearing; Undertake an extensive pre-clearing survey, delineating habitat-bearing trees and shrubs to be retained/removed; and Supervise the clearance of trees and shrubs (native and exotic) in order to capture, treat and/or relocate any displaced fauna. 	Prior to and during vegetation clearance works	Proponent Project Ecologist
Tree Replacement	All trees proposed for removal should be replaced at a ratio of 1:1 elsewhere within the Subject Property, with mature, locally mature species representative of the River-flat Eucalypt Forest Endangered Ecological Community.	Construction phase; Post-construction phase	Proponent Project Ecologist

Action	Outcome	Timing	Responsibility
Landscaping	Landscaping works across the site should implement where possible, native vegetation representative of the River-flat Eucalypt Forest Endangered Ecological Community, to provide increased habitat features across the Subject Land.	Construction phase; Post-construction phase	Proponent Landscape Architect
Erosion and Sedimentation	Appropriate erosion and sediment control must be erected and maintained at all times during construction in order to avoid the potential of incurring indirect impacts on biodiversity values. As a minimum, such measures should comply with the relevant industry guidelines such as 'the Blue Book' (Landcom 2004).	Construction phase	Proponent Construction Contractor
Erection of temporary fencing	Temporary fencing should be erected around retained native vegetation that may incur indirect impacts on biodiversity values due to the construction works.	Construction phase	Proponent Construction Contractor
Storage and Stockpiling (Soil and Materials)	All storage, stockpile and laydown sites should be located within the Construction Footprint (Figure 1). Avoid importing any soil from outside the site as this can introduce weeds and pathogens to the site in order to avoid the potential of incurring indirect impacts on biodiversity values.	Construction phase	Construction Contractors
Stormwater	Potential impacts relating to stormwater and runoff will be managed during construction and operation phases. The CEMP will guide stormwater management during the construction phase of development.	Post-construction phase	Proponent Construction Contractors/ Architect

7. Assessment of Impacts

7.1 Direct Impacts

7.1.1 Full Clearing

The proposed development will require the removal of approximately 4.76ha of PCT 835 across the following condition zones:

- 4.50ha of PCT 835 – Grassland with exotic trees;
- 0.04ha of PCT 835 – Grassland with planted *Casuarina glauca's*; and
- 0.22ha of PCT 835 – Remnant Canopy.

The development has been strategically positioned to minimise impacts on native vegetation and habitat as much as possible. The proponent has primarily chosen areas of cleared land for the proposed development. The vegetation proposed for removal within the Subject Land is deemed of low quality, having been subject to extensive periods of clearing, as well as being overrun with exotic species.

7.1.2 Direct Impacts – Partial Clearing

The proposed development will require the APZ maintenance of approximately 2.33ha of PCT 835 across the following condition zones:

- 2.24ha of PCT 835 – Grassland with exotic trees; and
- 0.08ha of PCT 835 – Grassland with planted *Casuarina glauca's*

The proposed development will require the APZ to be maintained to the standards of an IPA. It is anticipated that due to the lack of canopy cover across the zones, APZ requirements will be able to be achieved with tree removal being kept to a minimum.

7.2 Prescribed Impacts

There will be no prescribed impacts on threatened entities associated with the proposed development.

7.3 Indirect Impacts

Indirect impacts occur when the proposal or activities relating to the construction or operation of the proposal affect native vegetation, threatened ecological communities and threatened species habitat beyond the Subject Land. Impacts may also result from changes to land-use patterns, such as an increase in vehicular access and human activity on native vegetation, threatened ecological communities and threatened species habitat. The indirect impacts of this proposed development are outlined in **Table 16**.

Table 16. Indirect impacts associated with the proposed development.

Indirect Impact	Nature, extent and duration	TEC's/PCTs and/or Threatened Species and their habitat likely to be impacted	Consequences of the impacts for the bioregional persistence of the threatened species, threatened ecological communities and their habitats.
(a) inadvertent impacts on adjacent habitat or vegetation	Vegetation and habitat directly adjacent to the Subject Land has the potential to experience ongoing indirect impacts as a result of the proposed development. Although unlikely given the disturbed history of the Subject Land. The disturbance caused during construction may increase weed infestations within adjacent vegetation, which in turn may decrease its habitat value.	One TEC occurs adjacent to the Subject Land – River-flat Eucalypt Forest. There is also the potential that threatened species occur in areas adjacent to Subject Land that may be impacted by a decrease in habitat condition.	While changes to vegetation condition may have a localised impact to threatened species, threatened ecological communities and their habitats, this is not expected to impact on their bioregional persistence.
(b) reduced viability of adjacent habitat due to edge effects	The proposed construction and on-going operation may lead to an increase in weed infiltration into adjacent habitat due to enhanced edge effects. However, due to the disturbed nature of vegetation within and surrounding the Subject Land, it is unlikely that this will significantly impact on such areas. Any impacts are expected to be restricted to a couple of metres into adjacent vegetation.	One TEC occurs adjacent to the Subject Land – River-flat Eucalypt Forest. There is also the potential that threatened species occur in areas adjacent to Subject Land. The TEC and threatened species may be	While edge effects may have a localised impact to TECs and threatened species, this is not expected to impact on their bioregional persistence, considering the large habitat connectivity within the surrounding areas.

Indirect Impact	Nature, extent and duration	TEC's/PCTs and/or Threatened Species and their habitat likely to be impacted	Consequences of the impacts for the bioregional persistence of the threatened species, threatened ecological communities and their habitats.
		impacted by edge effects leading to a reduced viability in habitat.	
(c) reduced viability of adjacent habitat due to noise, dust or light spill	<p>An increase in noise is to be expected during construction. As the Subject Land is located in a rural area, this may have an impact on any species roosting adjacent to the site during the day that are not adapted to such noises. It is not expected that construction would occur throughout the night, and as such would not impact on nocturnal species that may utilise adjacent habitat, or diurnal species that roost in adjacent habitat.</p> <p>The construction may increase dust in adjacent habitat. Dust can impact on a plants ability to photosynthesise and may increase plant mortality in the adjacent vegetation. It is however not expected that this would have such an impact to decrease the viability of adjacent habitat.</p> <p>It is expected that the construction would occur during normal working hours, and as such light spill is not expected to affect adjacent habitat.</p>	<p>One TEC occurs adjacent to the Subject Land – River-flat Eucalypt Forest. This TEC may be impacted by increases in noise and dust spill.</p> <p>There is potential that threatened species use habitat adjacent to the Subject Land. Such species may be impacted by an increase in noise and dust spill into adjacent habitats.</p>	<p>While the construction may have a localised impact to the TEC and threatened species, this is not expected to impact on their bioregional persistence, considering large areas of habitat connectivity allowing their movement away from impacted areas.</p>

Indirect Impact	Nature, extent and duration	TEC's/PCTs and/or Threatened Species and their habitat likely to be impacted	Consequences of the impacts for the bioregional persistence of the threatened species, threatened ecological communities and their habitats.
(d) transport of weeds and pathogens from the site to adjacent vegetation	As previously discussed, the proposed construction may lead to an increase in weed infiltration into adjacent habitat due to enhanced edge effects. It is however not expected that weeds will be transported via human or vehicular traffic into surrounding areas during construction. Temporary fencing will be erected around retained native vegetation to avoid such indirect impacts occurring during construction.	One TEC occurs adjacent to the Subject Land – River-flat Eucalypt Forest. There is also potential that threatened species use habitat adjacent to the Subject Land. The TEC and threatened species may be impacted by weed and pathogen transportation leading to a reduced viability in habitat.	While weeds and pathogens may have a localised impact to TECs and threatened species, this is not expected to impact on their bioregional persistence, considering the large habitat connectivity within the surrounding areas.
(e) increased risk of starvation, exposure and loss of shade or shelter	It is highly unlikely that any threatened fauna would be exposed to increased risks from starvation, exposure, and loss of shade and shelter as a result of the proposed development given the majority of it is already completely cleared and unsuitable for habitation. No habitat is to be removed beyond the Subject Land, although disturbances from noise during construction and operation may deem such habitats unsuitable for certain species. However, due to the areas of habitat connectivity adjoining the Subject Land, it is unlikely that this impact will be significant as such habitats will continue to provide food resources and shelter for fauna species.	N/A	N/A

Indirect Impact	Nature, extent and duration	TEC's/PCTs and/or Threatened Species and their habitat likely to be impacted	Consequences of the impacts for the bioregional persistence of the threatened species, threatened ecological communities and their habitats.
(f) loss of breeding habitats	An increase in noise is to be expected during construction. As such, there is potential for disturbance to breeding habitats directly adjacent to the Subject Land. However, due to the large areas of habitat connectivity adjoining the Subject Land, it is not expected for this to significantly impact on species inhabiting such areas.	There is potential that threatened fauna species use habitat adjacent to the Subject Land for breeding. Such species may be impacted by an increase in noise into adjacent habitats, which may in turn impact on their breeding habitat.	This impact is expected to be localised and will not have an overall impact on the bioregional persistence of threatened species.
(g) trampling of threatened flora species	No threatened flora species were recorded within the Subject Land, however two (2) species have been "assumed present" due to potential habitat within the Subject Land. Although no threatened flora species have been historically recorded in vegetated areas within the Subject Land, there is still the potential for such species to exist in these areas.	<i>Pilularia novae-hollandiae</i> (Austral Pillwort) <i>Pomaderris brunnea</i> (Brown Pomaderris):	Where possible threatened species that are assumed to be present should be surveyed for within the appropriate DPIE survey period. If no appropriate surveys are able to be conducted then offsets are to be purchased for these species.
(h) inhibition of nitrogen fixation and increased soil salinity	It is unlikely that the inhibition of nitrogen fixation will affect vegetation adjacent to the Subject Land. Clearing will be limited to the Subject Land and as such is not expected to affect vegetation directly adjacent to the Subject Land.	N/A	N/A

Indirect Impact	Nature, extent and duration	TEC's/PCTs and/or Threatened Species and their habitat likely to be impacted	Consequences of the impacts for the bioregional persistence of the threatened species, threatened ecological communities and their habitats.
(i) fertiliser drift	This issue is not likely to affect the vegetation within or surrounding the Subject Land.	N/A	N/A
(j) rubbish dumping	There is the possibility that rubbish dumping (including littering) in adjacent vegetation increases during construction. The dumping/littering of food resources may provide a food source for fauna, including threatened species. However, this may also encourage invasive species into such habitats. This impact can be mitigated by the appropriate disposal of rubbish.	There is potential that threatened fauna species use habitat adjacent to the Subject Land. Such species may be impacted by the dumping of rubbish, particularly food resources. This may result in both positive (food source) and negative impacts (increase in predators) to such species.	This impact is expected to be localised and will not have an overall impact on the bioregional persistence of the TECs or threatened species.
(k) wood collection	This issue is not likely to affect the vegetation surrounding the Subject Land during and post-construction, particularly as the majority of vegetation surrounding the Subject Land cannot be accessed as it is private property.	NA	NA
(l) bush rock removal and disturbance	This issue is not likely to affect the vegetation surrounding the Subject Land. No bush rock was observed within or adjacent to the Subject Land.	N/A	N/A

Indirect Impact	Nature, extent and duration	TEC's/PCTs and/or Threatened Species and their habitat likely to be impacted	Consequences of the impacts for the bioregional persistence of the threatened species, threatened ecological communities and their habitats.
(m) increase in predatory species populations	There is potential that predatory species, such as foxes and cats, already inhabit areas within and surrounding the Subject Land. There is the possibility that other indirect impacts, such as an increase in rubbish dumping, may encourage predatory species into the area.	There is potential that threatened fauna species use habitat adjacent to the Subject Land. Such species may be impacted by an increase in predatory species populations.	An increase in predatory species adjacent to the Subject Land may have widespread ramifications for any locally occurring threatened species. In particular, the large areas of habitat connectivity adjacent to the Subject Land will allow for the movement of predatory species across the wider landscape.
(n) increase in pest animal populations	There is potential that pest animal populations already inhabit areas within and surrounding the Subject Land. There is the possibility that other indirect impacts, such as an increase in rubbish dumping, may encourage an increase in pest animal populations.	There is potential that threatened fauna species use habitat adjacent to the Subject Land. Such species may be impacted by an increase in pest animal populations.	An increase in pest animal species adjacent to the Subject Land may have widespread ramifications for any locally occurring threatened species. In particular, the large areas of habitat connectivity adjacent to the Subject Land will allow for the movement of pest animal species across the wider landscape.
(o) increased risk of fire	The Subject Land is identified as occurring within bushfire prone land. The proposed development has been positioned to comply with the RFS guidelines for bushfire protection	N/A	N/A

Indirect Impact	Nature, extent and duration	TEC's/PCTs and/or Threatened Species and their habitat likely to be impacted	Consequences of the impacts for the bioregional persistence of the threatened species, threatened ecological communities and their habitats.
	without any further land management. It is not expected that this will alter the bushfire risk of vegetation surrounding the Subject Land.		
(p) disturbance to specialist breeding and foraging habitat, e.g., beach nesting for shorebirds.	No specialist breeding and foraging habitat was identified within or adjacent to the Subject Land. It is therefore not expected that the proposed development will disturb any specialist breeding and foraging habitat.	N/A	N/A

8. Impact Summary

8.1 Impacts on Native Vegetation

The following native vegetation within the Subject Land is proposed to be impacted as a result of the proposed development:

- 7.09ha representative of PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion

The purchase and retirement of Biodiversity Offset Credits will be required for the following native vegetation within the Subject Land (**Figure 15**):

- 0.12ha within Zone 2 (grassland with planted *Casuarina glauca*'s) representative of PCT 835; and
- 0.22ha within Zone 3 (remnant canopy), representative of PCT 835.

The purchase and retirement of Biodiversity Offset Credits will not be required for the vegetation within Zone 1 (grassland with exotic trees; **Figure 15**).

8.2 Impacts on Threatened Species

The following threatened species have been assumed present within the Subject Land and will require the purchase and retirement of Biodiversity Offset Credits:

- *Collocephalon fimbriatum* (Gang-gang Cockatoo);
- *Haliaeetus leucogaster* (White-bellied Sea Eagle);
- *Hieraaetus morphnoides* (Little Eagle);
- *Litoria aurea* (Green and Golden Bell Frog);
- *Lophoictinia isura* (Square-tailed Kite);
- *Myotis macropus* (Southern Myotis);
- *Ninox connivens* (Barking Owl);
- *Ninox strenua* (Powerful Owl);
- *Pandion cristatus* (Eastern Osprey);
- *Petauroides volans* (Greater Glider);
- *Petaurus norfolcensis* (Squirrel Glider);
- *Phascolarctos cinereus* (Koala);
- *Pilularia novae-hollandiae* (Austral Pillwort);
- *Pomaderris brunnea* (Brown Pomaderris); and
- *Tyto novaehollandiae* (Masked Owl).

8.3 Serious and Irreversible Impacts (SAIL's)

One (1) assumed present threatened species within the Subject Land has been identified as an entity at risk of a SAIL in the Threatened Biodiversity Data Collection (DPIE 2021b):

- *Pilularia novae-hollandiae* (Austral Pillwort);

8.3.1 *Pilularia novae-hollandiae* (Austral Pillwort);

The threshold of SAIL for *Pilularia novae-hollandiae* is currently 'Under Development'. This means that any impact on the potential habitat for this threatened species could be considered 'serious and irreversible'. Due to the potential sensitivity of this threatened species to any impact, a determination of whether or not the proposed impacts are serious and irreversible are to be undertaken in accordance with Section 9.1 of the BAM (DPIE 2020a) is required. This is outlined in **Table 17**.

Table 17. Additional impact assessment provisions for threatened species or populations that are associated with a serious and irreversible impact.

Serious and Irreversible Impact (SII) Impact assessment provisions for threatened species or populations: <i>Pilularia novae-hollandiae</i>		
BC Act Status: Endangered		
a) the action and measures taken to avoid the direct and indirect impact on the potential entity for a SII	The proposed development will result in the removal and APZ management of approximately 7.09 ha of potential habitat for this species. This SII species has not been surveyed for and as such has been assumed present within the Subject Land. It is deemed unlikely that this species would occupy the Subject Land, however it is recommended that a targeted survey be conducted for this species during the optimal survey period of October - December to officially rule out its presence. In order to mitigate potential damage to this species, the proponent has positioned the majority of proposed development in an area that is heavily degraded and dominated by exotic agricultural weeds.	
b) The size of the local population directly and indirectly impacted by the development, clearing or biodiversity certification.	This species has not been surveyed for and has been assumed present within the Subject Land. According to the Species Profile (OEH 2018) for this species the only known extant population ins NSW are at Lake Cowal and Oolambeyan National Park. The proposed development will have no impact on these populations.	
c) The extent to which the impact exceeds any threshold for the potential entity	The impact thresholds for this species are currently under development.	
d) The likely impact (including direct and indirect impacts) that the development, clearing or biodiversity certification will have on the habitat of the local population, including but not limited to:	i. an estimate of the change in habitat available to the local population as a result of the proposed development	The proposed development will result in the removal and APZ management of approximately 7.09 ha of potential habitat for this species. No direct or indirect impacts associated with the proposed development will impact on the local population of this species.
	ii. the proposed loss, modification, destruction or isolation of the available habitat used by the local population	The proposed development will result in the removal and APZ management of approximately 7.09 ha of potential habitat becoming unviable as the ground layer will be required to be maintained to below 100mm.
	iii. modification of habitat required for the maintenance of processes important to the species' life cycle (such as in the case of a plant – pollination, seed set, seed dispersal, germination), genetic diversity and long-term evolutionary development.	The proposed development will result in the removal and APZ management of approximately 7.09 ha of potential habitat for this species. It is however not expected that the removal and management of this vegetation within the Subject Land will impact of processes important to the species' life cycle, considering the degraded nature of the vegetation within the Subject Land, would already be inhibiting these processes for this species.

Serious and Irreversible Impact (SII)
Impact assessment provisions for threatened species or populations:
Pilularia novae-hollandiae

BC Act Status: Endangered

<p>e) The likely impact on the ecology of the local population. At a minimum, address the following: for flora, address how the proposal is likely to affect the ecology and biology of any residual plant population that will remain post development including where information is available: – pollination cycle – seedbanks – recruitment, and – interactions with other species (e.g. pollinators, host species, mycorrhizal associations)</p>	<p>This species has not been surveyed for and as such has been assumed present within the Subject Land. The modification of vegetation within the Subject Land is not expected to impact on the pollination cycle, seedbanks recruitment or interactions with other species. The vegetation within the Subject Land is already heavily disturbed and has experienced prolonged periods of exotic weed infiltration. Should surveys reveal that this species occurs within the Subject Land it would already be experiencing the aforementioned pressures associated with the current disturbed nature of the Subject Land.</p>
<p>f) A description of the extent to which the local population will become fragmented or isolated as a result of the proposed development.</p>	<p>The removal and modification of vegetation as a result of the proposed development is not expected to fragment or isolate a local population of this species if they are present within the Subject Land. The more suitable habitat for this species will remain along the periphery of the Subject Land. As such, habitat connectivity will still remain for any individuals/populations that may be present within the area.</p>
<p>g) The relationship of the local population to other population/populations of the species. This must include consideration of the interaction and importance of the local population to other population/populations for factors such as breeding, dispersal and genetic viability/diversity, and whether the local population is at the limit of the species' range.</p>	<p>In NSW, Austral Pillwort has been recorded from suburban Sydney, Khancoban, the Riverina between Albury and Urana (including Henty, Walbundrie, Balldale and Howlong), Oolambeyan National Park near Carathool and at Lake Cowal near West Wyalong. The populations at Lake Cowal and Oolambeyan NP are the only known extant populations in NSW, although the species is obscure and has possibly been overlooked elsewhere. The species has also been recorded in the Australian Capital Territory, Victoria, Tasmania, South Australia and Western Australia (OEH 2018). Surveys have not been undertaken to ascertain whether individuals are located within the Subject Land. As such, its importance cannot be ascertained. It is however highly unlikely this should this species be present it would interact with other populations, with the nearest being over 500km away.</p>
<p>h) The extent to which the proposed development will lead to an increase in threats and indirect impacts, including impacts from invasive flora and fauna, that may in turn lead to a decrease in the viability of the local population.</p>	<p>The Subject Land already experiences high levels of exotic flora due to the historic use of the site. It is not anticipated that the proposed development will result in any significant direct or indirect impacts that would lead to a decrease in viability, more than is already experienced.</p>
<p>i) An estimate of the area, or number of populations and size of populations that is in the reserve system in NSW, the IBRA region and the IBRA subregion.</p>	<p>Within NSW, this species is currently known from two disjunct areas; one population in Lake Cowl in Bland LGA covering an area of approximately 144.85ha and one population in the Oolambeyan National Park in the Murrumbidgee LGA covering an area of approximately 1.55ha.</p>

Serious and Irreversible Impact (SII)
Impact assessment provisions for threatened species or populations:
Pilularia novae-hollandiae

BC Act Status: Endangered

j) The measure/s proposed to contribute to the recovery of the species in the IBRA subregion.

The *Pilularia novae-hollandiae* 'Saving our Species Program' (OEH 2014) has not identified measures for the population within the Cumberland Subregion however, it has identified various measures proposed to manage key threats to conserve this species in other subregions, including:

- Reduce and maintain weed densities at low levels;
- Ensure grazing regime is appropriate for the species/community;
- Track species abundance / condition over time;
- Establish new wild population/s; and
- Minimise accidental damage on road/track edges;



Impact Summary

- Lease Area
- Subject Land

PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion

- Impact Zone (no offsets required)
- Impact Zone (offsets required)

0 30 60 90 120 m



NARLA
environmental

Date: 08/07/2021
Coordinate System: GDA94 MGA Zone 56
Data Source: NSW SIXMaps 2021.
Image Source: Nearmap Australia Pty Ltd [January 2021]



Figure 15. Impacts on native vegetation and offset requirements.

9. Biodiversity Offset Credit Requirements

The preferred approach to offset the residual impacts of the proposal is to purchase and retire the appropriate species credits from registered Biodiversity Stewardship Sites that comply with the trading rules of the NSW BOS in accordance with the 'like for like' report generated by the BAM calculator. If such credits are unavailable, credits would be sourced in accordance with the 'variation report' generated by the BAMC.

A payment to the Biodiversity Conservation Trust (BCT) would be considered as a contingency option if a suitable number and type of biodiversity credits cannot be secured.

Estimated costs to purchase these credits, or alternatively, to allocate offset funds directly into the NSW BCT are available in the NSW Biodiversity Offsets Payment Calculator (DPIE 2020g).

9.1 Offset Requirement for Ecosystem Credits

A total of three (3) ecosystem credits are required to offset the biodiversity impacts of the proposed development (Table 18).

Table 18. Ecosystem credits required to offset the proposed development.

PCT	BC Act Status	Zone	Total Area (ha)	Ecosystem Credits Required
PCT 835: Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion	Endangered Ecological Community	Zone 1 (grassland with exotic trees)	6.8	0
		Zone 2 (Grassland with planted <i>Casuarina glauca's</i>)	0.12	1
		Zone 3 (Remnant Canopy)	0.22	2
Total Ecosystem Credits				3

9.2 Offset Requirement for Species Credits

Fifteen (15) candidate species credits that have been 'assumed present' will require offsetting through the retiring of biodiversity offset species credits under the BOS as a result of the proposed development.

Table 19. Species credits required to offset the proposed development.

Species	BC Act Status	Zone	Total Area (ha)	Species Credits Required
<i>Callocephalon fimbriatum</i> Gang-gang Cockatoo	Vulnerable	Zone 1 (Grassland with exotic trees)	3.9	4
		Zone 3 (Remnant Canopy)	0.22	2
		Subtotal		6
<i>Haliaeetus leucogaster</i> White-bellied Sea Eagle	Vulnerable	Zone 2 (Grassland with planted <i>Casuarina glauca</i>)	0.12	1
		Zone 3 (Remnant Canopy)	0.22	2
		Subtotal		3

Species	BC Act Status	Zone	Total Area (ha)	Species Credits Required
<i>Hieraaetus morphnoides</i> Little Eagle	Vulnerable	Zone 2 (Grassland with planted <i>Casuarina glauca</i>)	0.12	1
		Zone 3 (Remnant Canopy)	0.22	1
		Subtotal		2
<i>Litoria aurea</i> Green and Golden Bell Frog	Endangered	Zone 1 (Grassland with exotic trees)	6.8	8
		Zone 2 (Grassland with planted <i>Casuarina glauca</i>)	0.12	1
		Zone 3 (Remnant Canopy)	0.22	2
		Subtotal		11
<i>Lophoictinia isura</i> Square-tailed Kite	Vulnerable	Zone 2 (Grassland with planted <i>Casuarina glauca</i>)	0.12	1
		Zone 3 (Remnant Canopy)	0.22	1
		Subtotal		2
<i>Myotis macropus</i> Southern Myotis	Vulnerable	Zone 1 (Grassland with exotic trees)	6.8	8
		Zone 2 (Grassland with planted <i>Casuarina glauca</i>)	0.12	1
		Zone 3 (Remnant Canopy)	0.2	2
		Subtotal		11
<i>Ninox connivens</i> Barking Owl	Vulnerable	Zone 1 (Grassland with exotic trees)	1.6	2
		Zone 3 (Remnant Canopy)	0.19	2
		Subtotal		4
<i>Ninox strenua</i> Powerful Owl	Vulnerable	Zone 1 (Grassland with exotic trees)	1.6	2
		Zone 3 (Remnant Canopy)	0.19	2
		Subtotal		4
<i>Pandion cristatus</i> Eastern Osprey	Vulnerable	Zone 2 (Grassland with planted <i>Casuarina glauca</i>)	0.12	1

Species	BC Act Status	Zone	Total Area (ha)	Species Credits Required
		Zone 3 (Remnant Canopy)	0.22	1
		Subtotal		2
<i>Petauroides volans</i> Greater Glider	Vulnerable (EPBC Act only)	Zone 3 (Remnant Canopy)	0.22	2
		Subtotal		2
<i>Petaurus norfolcensis</i> Squirrel Glider	Vulnerable	Zone 3 (Remnant Canopy)	0.22	2
		Subtotal		2
<i>Phascolarctos cinereus</i> Koala	Vulnerable	Zone 2 (Grassland with planted <i>Casuarina glauca</i>)	0.12	1
		Zone 3 (Remnant Canopy)	0.22	2
		Subtotal		3
<i>Pilularia novae-hollandiae</i> Austral Pillwort	Endangered	Zone 1 (Grassland with exotic trees)	6.8	12
		Zone 2 (Grassland with planted <i>Casuarina glauca</i>)	0.12	1
		Zone 3 (Remnant Canopy)	0.22	3
		Subtotal		16
<i>Pomaderris brunnea</i> Brown Pomaderris	Endangered	Zone 1 (Grassland with exotic trees)	6.8	8
		Zone 2 (Grassland with planted <i>Casuarina glauca</i>)	0.12	1
		Zone 3 (Remnant Canopy)	0.22	2
		Subtotal		11
<i>Tyto novaehollandiae</i> Masked Owl	Vulnerable	Zone 1 (Grassland with exotic trees)	1.6	2
		Zone 3 (Remnant Canopy)	0.19	2
		Subtotal		4

10. Other Relevant Legislation and Planning Policies

10.1 State Environmental Planning Policy (Koala Habitat Protection) 2021

SEPP (Koala Habitat Protection) 2021 applies to development applications that requires consent from council. As the proposed works are part of a State Significant Development application that does not require Council consent, this SEPP does not apply.

In addition, “Core Koala Habitat” is defined by the SEPP as:

- A) an area of land which has been assessed by a suitably qualified and experienced person as being highly suitable koala habitat and where koalas are recorded as being present at the time of assessment of the land as highly suitable koala habitat; or
- (b) an area of land which has been assessed by a suitably qualified and experienced person as being highly suitable koala habitat and where koalas have been recorded as being present in the previous 18 years.

Whilst listed feed trees were located within the Subject Land, no evidence of Koalas were identified during the time of the site assessment and there are no proximal records with a 2.5km buffer. The vegetation within the Subject Land therefore does not meet the criteria to be listed as Core Koala Habitat.

10.2 State Environmental Planning Policy No 19—Bushland in Urban Areas

SEPP 19 – Bushland in Urban Areas applies to the areas and parts of areas specified in Schedule 1 of the SEPP that adjoin bushland zoned or reserved for public open space purposes. Although Hawkesbury City Council is listed in Schedule 1 of the SEPP, the Subject Land does not adjoin any bushland zoned or reserved for public open space purposes. As such, this SEPP does not apply to the Subject Land.

10.3 State Environmental Planning Policy (Coastal Management) 2018

State Environmental Planning Policy (Coastal Management) 2018 applies to land within the coastal zone. The coastal zone means the area of land comprised of the following coastal management areas:

- the coastal wetlands and littoral rainforests area;
- the coastal vulnerability area;
- the coastal environment area; or
- the coastal use area.

As the Subject Land does not occur within any of these listed areas, this SEPP does not apply.

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12. Appendices

Appendix A. BAM Site - Field Survey Forma (copied directly from Electronic Data Sheet).

Appendix B. Species Polygon for Gang- gang Cockatoos.

Appendix C. Species polygon for threatened raptors.

Appendix D. Species polygon for Green and Golden Bell Frogs.

Appendix E. Species polygon for Southern Myotis.

Appendix F. Species polygon for threatened owls.

Appendix G. Species polygon for Koalas.

Appendix H. Species polygon for threatened plants.

Appendix I. Species polygon for threatened gliders.

Appendix J. BAMC Generated Biodiversity Credit Report.

Appendix A. BAM Site - Field Survey Forma (copied directly from Electronic Data Sheet).

BAM Site – Field Survey Form					
Date:	17.03.21	Plot ID:	plot 1	Photo #:	0
Zone:	56H	Plot Dimensions:	50m x 20m	Easting:	291084.25 m E
Datum:	94	Middle bearing from 0m:	306	Northing:	6278015.80 m S
PCT:	Zone 1: PCT 835 - Grassland with exotic trees				
Growth Form	Scientific Name		Cover	Abundance	
High Threat Exotic	<i>Paspalum dilatatum</i>		70	1000	
High Threat Exotic	<i>Senecio madagascariensis</i>		3	100	
Exotic	<i>Conyza bonariensis</i>		0.5	20	
Exotic	<i>Solanum nigrum</i>		0.1	2	
Exotic	<i>Trifolium repens</i>		0.3	30	
Exotic	<i>Solanum sisymbriifolium</i>		0.1	1	
High Threat Exotic	<i>Eragrostis curvula</i>		7	30	
Exotic	<i>Setaria parviflora</i>		0.5	20	
Grass & grasslike (GG)	<i>Cynodon dactylon</i>		1	100	
Exotic	<i>Plantago lanceolata</i>		0.1	1	
Exotic	<i>Hypochaeris radicata</i>		0.1	3	
Exotic	<i>Vicia sativa</i>		0.1	1	
Exotic	<i>Verbena bonariensis</i>		0.1	1	
DBH		# Tree Stems Count	# Hollow Bearing Trees		
80+cm		0	0		
50-79cm		0	0		
30-49cm		absent	0		
20-29cm		absent	0		
10-19cm		absent	0		
5-9cm		absent	0		
<5cm		absent	0		
Length of Logs (m)		0			
BAM Attribute (1x1m)			Litter Cover (%)		
1 (5m)			0		
2 (15m)			0		
3 (25m)			0		
4 (35m)			0		
5 (45m)			0		
Average			0		
Growth Form	Composition Data (Count of Native Cover)		Structure Data (Sum of Cover)		
Tree	0		0		
Shrub	0		0		
Grass	1		1		

Forb	0	0
Fern	0	0
Other	0	0
High Threat Exotics	3	80

BAM Site – Field Survey Form					
Date:	17.03.21	Plot ID:	plot 2	Photo #:	0
Zone:	56H	Plot Dimensions:	50 x 20	Easting:	291002.36 m E
Datum:	94	Middle bearing from 0m:	311	Northing:	6278148.50 m S
PCT:	Zone 1: PCT 835 - Grassland with exotic trees				
Growth Form	Scientific Name		Cover	Abundance	
Grass & grasslike (GG)	<i>Cynodon dactylon</i>		90	2000	
Exotic	<i>Verbena bonariensis</i>		6	40	
Exotic	<i>Setaria parviflora</i>		6	500	
Exotic	<i>Sida rhombifolia</i>		2	20	
Exotic	<i>Plantago lanceolata</i>		1	30	
Exotic	<i>Conyza bonariensis</i>		0.3	20	
High Threat Exotic	<i>Senecio madagascariensis</i>		0.7	30	
Exotic	<i>Rumex crispus</i>		0.6	20	
High Threat Exotic	<i>Eragrostis curvula</i>		1	5	
Exotic	<i>Solanum nigrum</i>		0.2	2	
Forb (FG)	<i>Commelina cyanea</i>		0.1	1	
High Threat Exotic	<i>Paspalum dilatatum</i>		0.2	5	
Exotic	<i>Bromus catharticus</i>		0.3	10	
Exotic	<i>Cirsium vulgare</i>		0.3	5	
Exotic	<i>Trifolium repens</i>		0.1	3	
Exotic	<i>Vicia sativa</i>		0.3	15	
		# Tree Stems Count	# Hollow Bearing Trees		
80+cm		absent	0		
50-79cm		absent	0		
30-49cm		absent	0		
20-29cm		absent	0		
10-19cm		absent	0		
5-9cm		absent	0		
<5cm		absent	0		
Length of Logs (m)		0			
BAM Attribute (1x1m)			Litter Cover (%)		
1 (5m)			0		
2 (15m)			0		
3 (25m)			0		
4 (35m)			0		
5 (45m)			0		
Average			0		
Growth Form	Composition Data		Structure Data		
	(Count of Native Cover)		(Sum of Cover)		

Tree	0	0
Shrub	0	0
Grass	1	90
Forb	1	0.1
Fern	0	0
Other	0	0
High Threat Exotics	3	1.9

BAM Site – Field Survey Form					
Date:	17.03.2021	Plot ID:	plot 3	Photo #:	0
Zone:	56H	Plot Dimensions:	50 x 20	Easting:	290862.66 m E
Datum:	94	Middle bearing from 0m:	34	Northing:	13
PCT:	Zone 1: PCT 835 - Grassland with exotic trees				
Growth Form	Scientific Name	Cover	Abundance		
Grass & grasslike (GG)	<i>Cynodon dactylon</i>	70	1000		
High Threat Exotic	<i>Senecio madagascariensis</i>	6	100		
Exotic	<i>Setaria parviflora</i>	20	500		
Exotic	<i>Hypochaeris radicata</i>	7	100		
Exotic	<i>Lotus angustissimus</i>	0.1	1		
Exotic	<i>Cyperus brevifolius</i>	3	200		
High Threat Exotic	<i>Eragrostis curvula</i>	4	10		
Exotic	<i>Trifolium repens</i>	0.1	5		
Exotic	<i>Conyza bonariensis</i>	1	20		
High Threat Exotic	<i>Paspalum dilatatum</i>	3	100		
Exotic	<i>Plantago lanceolata</i>	0.1	5		
Exotic	<i>Verbena bonariensis</i>	0.1	1		
	# Tree Stems Count	# Hollow Bearing Trees			
80+cm	absent	0			
50-79cm	absent	0			
30-49cm	absent	0			
20-29cm	absent	0			
10-19cm	absent	0			
5-9cm	absent	0			
<5cm	absent	0			
Length of Logs (m)	0				
1 (5m)	0				
2 (15m)	0				
3 (25m)	0				
4 (35m)	0				
5 (45m)	0				
Average	0				
Growth Form	Composition Data (Count of Native Cover)	Structure Data (Sum of Cover)			
Tree	0	0			
Shrub	0	0			
Grass	1	70			
Forb	0	0			
Fern	0	0			
Other	0	0			
High Threat Exotics	3	13			

BAM Site – Field Survey Form					
Date:	17.03.2021	Plot ID:	plot 4	Photo #:	0
Zone:	56H	Plot Dimensions:	50 x 20	Easting:	290992.51 m E
Datum:	94	Middle bearing from 0m:	225	Northing:	6278127.53 m S
PCT:	Zone 2: PCT 835 - Grassland with planted <i>Casuarina glauca</i> 's				
Growth Form	Scientific Name	Cover	Abundance		
Tree (TG)	<i>Casuarina glauca</i>	15	7		
High Threat Exotic	<i>Eragrostis curvula</i>	3	6		
Exotic	<i>Plantago lanceolata</i>	1	20		
Exotic	<i>Sida rhombifolia</i>	0.4	20		
Grass & grasslike (GG)	<i>Cynodon dactylon</i>	20	1000		
High Threat Exotic	<i>Cenchrus clandestinus</i>	40	2000		
High Threat Exotic	<i>Senecio madagascariensis</i>	0.1	3		
Exotic	<i>Portulaca oleracea</i>	0.1	1		
High Threat Exotic	<i>Paspalum dilatatum</i>	3	100		
Exotic	<i>Verbena bonariensis</i>	1	20		
Exotic	<i>Conyza bonariensis</i>	0.2	10		
Exotic	<i>Setaria parviflora</i>	6	500		
Exotic	<i>Solanum nigrum</i>	0.1	3		
Exotic	<i>Phytolacca octandra</i>	0.1	2		
High Threat Exotic	<i>Cyperus eragrostis</i>	0.1	1		
Exotic	<i>Hypochaeris radicata</i>	0.1	1		
Grass & grasslike (GG)	<i>Sporobolus creber</i>	0.1	1		
Grass & grasslike (GG)	<i>Juncus usitatus</i>	0.1	1		
		# Tree Stems Count	# Hollow Bearing Trees		
80+cm		0	0		
50-79cm		0	0		
30-49cm		present	0		
20-29cm		present	0		
10-19cm		absent	0		
5-9cm		present	0		
<5cm		present	0		
Length of Logs (m)		0			
BAM Attribute (1x1m)			Litter Cover (%)		
1 (5m)			0		
2 (15m)			0		
3 (25m)			5		
4 (35m)			0		
5 (45m)			0		
Average			1		
Growth Form		Composition Data		Structure Data	

	(Count of Native Cover)	(Sum of Cover)
Tree	1	15
Shrub	0	0
Grass	3	20.2
Forb	0	0
Fern	0	0
Other	0	0
High Threat Exotics	5	46.2

BAM Site – Field Survey Form					
Date:	17.03.2021	Plot ID:	plot 5	Photo #:	0
Zone:	56H	Plot Dimensions:	50 x 20	Easting:	290703.65 m E
Datum:	94	Middle bearing from 0m:	354	Northing:	6278023.93 m S
PCT:	Zone 3: PCT 835 - Remnant Canopy				
Growth Form	Scientific Name	Cover	Abundance		
Tree (TG)	<i>Angophora subvelutina</i>	6	3		
High Threat Exotic	<i>Bidens subalternans</i>	10	200		
Forb (FG)	<i>Einadia hastata</i>	3	100		
Forb (FG)	<i>Commelina cyanea</i>	5	500		
Exotic	<i>Datura stramonium</i>	0.5	4		
Exotic	<i>Sida rhombifolia</i>	6	N/A		
High Threat Exotic	<i>Cinnamomum camphora</i>	2	1		
High Threat Exotic	<i>Lantana camara</i>	0.1	1		
Exotic	<i>Phytolacca octandra</i>	0.1	1		
Grass & grasslike (GG)	<i>Cynodon dactylon</i>	10	1000		
High Threat Exotic	<i>Eragrostis curvula</i>	1	4		
Exotic	<i>Solanum nigrum</i>	0.2	5		
Forb (FG)	<i>Dysphania pumilio</i>	1	100		
High Threat Exotic	<i>Cenchrus clandestinus</i>	6	500		
Exotic	<i>Setaria parviflora</i>	2	100		
Exotic	<i>Conyza bonariensis</i>	0.5	10		
Exotic	<i>Bromus catharticus</i>	0.5	20		
Exotic	<i>Digitaria ciliaris</i>	0.5	20		
High Threat Exotic	<i>Chloris gayana</i>	3	200		
Exotic	<i>Chenopodium album</i>	0.5	20		
Grass & grasslike (GG)	<i>Microlaena stipoides</i>	0.3	10		
Exotic	<i>Solanum sisymbriifolium</i>	0.5	10		
		# Tree Stems Count	# Hollow Bearing Trees		
80+cm		0	0		
50-79cm		1	1		
30-49cm		present	1		
20-29cm		present	0		
10-19cm		absent	0		
5-9cm		absent	0		
<5cm		absent	0		
Length of Logs (m)		0			
BAM Attribute (1x1m)			Litter Cover (%)		
1 (5m)			10		
2 (15m)			15		
3 (25m)			0		

4 (35m)	0	
5 (45m)	10	
Average	7	
Growth Form	Composition Data	Structure Data
	(Count of Native Cover)	(Sum of Cover)
Tree	1	6
Shrub	0	0
Grass	2	10.3
Forb	3	9
Fern	0	0
Other	0	0
High Threat Exotics	6	22.1

Appendix B. Species Polygon for Gang- gang Cockatoos.



Appendix C. Species polygon for threatened raptors.



Appendix D. Species polygon for Green and Golden Bell Frogs.



Appendix E. Species polygon for Southern Myotis.



Appendix F. Species polygon for threatened owls.



Appendix G. Species polygon for Koalas.



Appendix H. Species polygon for threatened plants.



Appendix I. Species polygon for threatened gliders.





BAM Biodiversity Credit Report (Like for like)

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00024876/BAAS21009/21/00024877	Western Sydney University - Centre of Excellence	10/06/2021
Assessor Name	Assessor Number	BAM Data version *
	BAAS21009	45
Proponent Names	Report Created	BAM Case Status
Department Education	08/07/2021	Finalised
Assessment Revision	Assessment Type	Date Finalised
0	Major Projects	08/07/2021

* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

Potential Serious and Irreversible Impacts

Name of threatened ecological community	Listing status	Name of Plant Community Type/ID
Nil		
Species		
Pilularia novae-hollandiae / Austral Pillwort		

Additional Information for Approval

PCTs With Customized Benchmarks

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PCT

No Changes

Predicted Threatened Species Not On Site

Name

No Changes

Ecosystem Credit Summary (Number and class of biodiversity credits to be retired)

Name of Plant Community Type/ID	Name of threatened ecological community	Area of impact	HBT Cr	No HBT Cr	Total credits to be retired
835-Cumberland riverflat forest	River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions	7.1	2	1	3

835-Cumberland riverflat forest

Like-for-like credit retirement options

Name of offset trading group	Trading group	Zone	HBT	Credits	IBRA region
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	River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions This includes PCT's: 686, 828, 835, 941, 1108, 1109, 1212, 1228, 1293, 1318, 1326, 1386, 1504, 1556, 1594, 1618, 1720, 1794	-	835_Grassland_exot_trees	No	0	Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi and Yengo. or Any IBRA subregion that is within 100 kilometers of the outer edge of the impacted site.
	River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions This includes PCT's: 686, 828, 835, 941, 1108, 1109, 1212, 1228, 1293, 1318, 1326, 1386, 1504, 1556, 1594, 1618, 1720, 1794	-	835_Grassland_plant_Cas	No	1	Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi and Yengo. or Any IBRA subregion that is within 100 kilometers of the outer edge of the impacted site.

BAM Biodiversity Credit Report (Like for like)

	River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions This includes PCT's: 686, 828, 835, 941, 1108, 1109, 1212, 1228, 1293, 1318, 1326, 1386, 1504, 1556, 1594, 1618, 1720, 1794	-	835_Remnant_canopy	Yes	2	Cumberland, Burragorang, Pittwater, Sydney Cataract, Wollemi and Yengo. or Any IBRA subregion that is within 100 kilometers of the outer edge of the impacted site.

Species Credit Summary

Species	Vegetation Zone/s	Area / Count	Credits
Callocephalon fimbriatum / Gang-gang Cockatoo	835_Grassland_exot_trees, 835_Remnant_canopy	4.1	6.00
Haliaeetus leucogaster / White-bellied Sea-Eagle	835_Grassland_plant_Cas, 835_Remnant_canopy	0.3	3.00
Hieraaetus morphnoides / Little Eagle	835_Grassland_plant_Cas, 835_Remnant_canopy	0.3	2.00

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BAM Biodiversity Credit Report (Like for like)

Litoria aurea / Green and Golden Bell Frog	835_Grassland_exot_trees, 835_Grassland_plant_Cas, 835_Remnant_canopy	7.1	11.00
Lophoictinia isura / Square-tailed Kite	835_Grassland_plant_Cas, 835_Remnant_canopy	0.3	2.00
Myotis macropus / Southern Myotis	835_Grassland_exot_trees, 835_Grassland_plant_Cas, 835_Remnant_canopy	7.1	11.00
Ninox connivens / Barking Owl	835_Grassland_exot_trees, 835_Remnant_canopy	1.8	4.00
Ninox strenua / Powerful Owl	835_Grassland_exot_trees, 835_Remnant_canopy	1.8	4.00
Pandion cristatus / Eastern Osprey	835_Grassland_plant_Cas, 835_Remnant_canopy	0.3	2.00
Petauroides volans / Greater Glider	835_Remnant_canopy	0.2	2.00
Petaurus norfolcensis / Squirrel Glider	835_Remnant_canopy	0.2	2.00
Phascolarctos cinereus / Koala	835_Grassland_plant_Cas, 835_Remnant_canopy	0.3	3.00
Pilularia novae-hollandiae / Austral Pillwort	835_Grassland_exot_trees, 835_Grassland_plant_Cas, 835_Remnant_canopy	7.1	16.00
Pomaderris brunnea / Brown Pomaderris	835_Grassland_exot_trees, 835_Grassland_plant_Cas, 835_Remnant_canopy	7.1	11.00

BAM Biodiversity Credit Report (Like for like)

Tyto novaehollandiae / Masked Owl	835_Grassland_exot_trees, 835_Remnant_canopy	1.8	4.00
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Credit Retirement Options

Like-for-like credit retirement options

Callocephalon fimbriatum / Gang-gang Cockatoo	Spp	IBRA subregion
	Callocephalon fimbriatum / Gang-gang Cockatoo	Any in NSW
Haliaeetus leucogaster / White-bellied Sea-Eagle	Spp	IBRA subregion
	Haliaeetus leucogaster / White-bellied Sea-Eagle	Any in NSW
Hieraaetus morphnoides / Little Eagle	Spp	IBRA subregion
	Hieraaetus morphnoides / Little Eagle	Any in NSW
Litoria aurea / Green and Golden Bell Frog	Spp	IBRA subregion
	Litoria aurea / Green and Golden Bell Frog	Any in NSW
Lophoictinia isura / Square-tailed Kite	Spp	IBRA subregion
	Lophoictinia isura / Square-tailed Kite	Any in NSW
Myotis macropus / Southern Myotis	Spp	IBRA subregion

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BAM Biodiversity Credit Report (Like for like)

	Myotis macropus / Southern Myotis	Any in NSW
Ninox connivens / Barking Owl	Spp	IBRA subregion
	Ninox connivens / Barking Owl	Any in NSW
Ninox strenua / Powerful Owl	Spp	IBRA subregion
	Ninox strenua / Powerful Owl	Any in NSW
Pandion cristatus / Eastern Osprey	Spp	IBRA subregion
	Pandion cristatus / Eastern Osprey	Any in NSW
Petauroides volans / Greater Glider	Spp	IBRA subregion
	Petauroides volans / Greater Glider	Any in NSW
Petaurus norfolcensis / Squirrel Glider	Spp	IBRA subregion
	Petaurus norfolcensis / Squirrel Glider	Any in NSW
Phascolarctos cinereus / Koala	Spp	IBRA subregion
	Phascolarctos cinereus / Koala	Any in NSW

BAM Biodiversity Credit Report (Like for like)

Pilularia novae-hollandiae / Austral Pillwort	Spp	IBRA subregion
	Pilularia novae-hollandiae / Austral Pillwort	Any in NSW
Pomaderris brunnea / Brown Pomaderris	Spp	IBRA subregion
	Pomaderris brunnea / Brown Pomaderris	Any in NSW
Tyto novaehollandiae / Masked Owl	Spp	IBRA subregion
	Tyto novaehollandiae / Masked Owl	Any in NSW



NARLA

environmental

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