Our Ref: 18URB09

14 July 2023

Summer Harrison
Angel Place
Level 8
123 Pitt Street
SYDNEY NSW 2000

Dear Summer,

Ecological Assessment Report at
Corner Faunce and Young Streets, West Gosford

Travers bushfire & ecology have been requested to address the RFI's as listed below from Keiran Thomas - Department of Planning and Environment (DPE) – dated 15/06/2023 and Joe Thompson - Biodiversity Conservation Division (BCD) – dated 18/05/2023.

DPE recommendations

Table 1 – Comments from the Department of Planning and Environment

Department of Planning and Environment	Travers bushfire & ecology
The development should be refined to explore opportunities for vegetation retention, particularly mature vegetation along site boundaries which may aid in screening the development	The existing vegetation is a mix of regrowth natives and weeds some of which are impacted by heavy pruning for powerline clearance. Currently, the existing vegetation along racecourse Road has been managed and the trees are of poor vigour as a result of ongoing pruning requirements. The assessment explored opportunities for retention of native vegetation, however retention of trees on the whole is largely restricted to the landscape buffer and further retention is not possible due to the slope and cut / fill requirement as slopes need to be minimal for the intended site use. Approximately 20% of the surveyed trees will be avoided. The preference is to reestablish native vegetation through landscaping. Given the contour levels at this location, vegetation from Swamp Sclerophyll Forest on Coastal Floodplains would be most preferable.
Where vegetation is proposed to be retained, an assessment of the likelihood of vegetation survival should be outlined given the significant	There will be encroachment into landscape buffer to create the require embankments, therefore requiring removal of mid-storey and ground layer vegetation. Arboriculture assessment has been undertaken on the trees to be removed which considers the impact on their

earthworks proposed and the limited width of landscaping strips	root zones and viability. It is clear that revegetation through landscaping will be needed.
Details of treatment of stormwater from the refuelling area and interaction with proposed stormwater network in events up to and including the PMF event. Section 4.3 of the Stormwater Management Report notes that only roof water would be treated prior to disposal	Others to Address
Clarification whether any works (including footings for retaining walls) would intersect water table. If the water table will be impacted, the Department requires an assessment against the NSW Aquifer Interference Policy, and consideration of the impacts of the works.	Others to Address

BCD recommendations

Table 2 – Comments from the BCD

BCD	Recommendations	TBE
Surveys for the Large-eared Pied Bat should be undertaken in accordance with the NSW survey guide for the BAM for 'Species credit' threatened bats and their habitats.	The BDAR report assumes presence of the Large-eared Pied Bat, *Chalinolobus dwyeri*, and the removal of all its habitat on site. As the Large-eared Pied Bat is a potential Serious and Irreversible Impact (SAII) species, BCD requires more information to be able to come to an informed decision about whether the impacts will constitute an SAII. The Threatened Biodiversity Data Collection (TBDC) states that derelict buildings are potential breeding sites for the Large-eared Pied Bat and the BDAR states that the buildings on site will be demolished. No pre-clearance checks for breeding habitat in the buildings have been undertaken. Further, no surveys for this species have been carried out during their breeding season to indicate whether this species is breeding in the vicinity. Without this information it is not possible for BCD to adequately assess the impacts of this development on this potential SAII species. If the species is detected breeding in the area, a more detailed SAII assessment will be required.	The report has correctly determined that only foraging habitat is present on the following basis. The "'*Species credit' threatened bats and their habitats NSW survey guide for the Biodiversity Assessment Method*" and the "*General Notes*" within the TBDC specifically describe breeding habitat as "**derelict concrete** buildings". Derelict means *"in a very poor condition as a result of disuse and neglect".* (Oxford Dictionary). An external inspection of the existing buildings within 100m of the development footprint has been undertaken and determined that they are currently being used and well maintained. Additionally, the building

	Recommendation 1 Surveys for the Large-eared Pied Bat should be undertaken in accordance with the NSW survey guide for the BAM for 'Species credit' threatened bats and their habitats.	elements observed included brick walls and tin construction with potential asbestos roofing. Therefore, potential breeding habitat is absent. Furthermore, President Hill is approximately 600m to the east and given the presence of rock outcropping in this reserve, this is a more likely location for roosting and possible breeding opportunities. For the above reasons we consider there to be no suitable breeding habitat within the site. As such, no target survey for the Large-eared Pied Bat is required.
The demolition of buildings needs to be discussed in the BDAR as a prescribed impact in accordance with Chapter 6 of the BAM, and the polygon for the species should include the buildings.	Chapter 6 of the Biodiversity Assessment Method (BAM) describes the demolition of buildings as a prescribed impact. Table 5.2 of the BDAR should therefore explain why the demolition of human made structures may or may not be a prescribed impact. Impacts are assumed in the following Tables 5.3 and 5.4, although the cause of the impacts are not recognised as being prescribed. This should be corrected. The species polygon for the large-eared pied bat needs to include the buildings which will be demolished in accordance with 5.2.6 (Step 6 – habitat condition) of the BAM. Recommendation 2 The demolition of buildings needs to be discussed in the BDAR as a prescribed impact in accordance with Chapter 6 of the BAM, and the polygon for the species should include the buildings.	Cave-breeding microbats occupy more varied roosting habitat such as buildings outside of the maternity season. The on-site buildings proposed to be demolished provide potential over-winter roosting habitat for threatened microbat species. These species include Large Bent-winged Bat, Little Bent-winged Bat, and Large-eared Pied Bat. Therefore, we consider the demolition of the proposed buildings to be a prescribed impact. Table 5.3 "Prescribed Impacts" and Table 5.4 "Direct Impact Assessment" within the BDAR has been updated to reflect and clarify this conclusion. Updates to the species polygon mapping is underway. The updated BDAR including the new impact area and credit calculations will be supplied in the near future.
BCD recommends the retention and	The BDAR report states that 113 trees will be removed, which is 80% of the	Hollow bearing trees have been assessed. There were

enhancement of as many ecological values as possible; retention of trees and understorey, the use of the local PCTs in landscaping and the use of significant hollows wherever possible.	trees on site, due to their condition, that they are an exotic/weed species or their position on the site. It is recommended that as many trees as possible are retained on site, in order to provide some on-going ecological value to the site, and that all landscaping uses plants from the two Plant Community Types (PCTs) on site. It is noted that only one side of the site is required to be maintained as an Asset Protection Zone, which would restrict the amount of vegetation to be retained on the north-eastern side. Currently there is minimal connectivity across the site, but the site would offer some value to birds using the area in transit to the reserve to the east and to areas in the surrounds. BCD encourages use of tree and understorey retention and landscaping to support the remaining ecological values of the site. As hollow bearing trees have not been assessed it is difficult to determine whether there are significant hollows which could be retained for use as 'nest-boxes' in the remaining trees. It is noted that the proponent does not consider it possible to provide nest boxes, due to the lack of large trees to put them in. However, BCD requests that significant hollows are retained whenever possible. Recommendation 3 BCD recommends the retention and enhancement of as many ecological values as possible; retention of trees and understorey, the use of the local PCTs in landscaping and the use of significant hollows wherever possible.	not records of large or distinct hollows recorded on the site (Table 3.5 has no data for observed hollows). In Table 5.6 on measures to mitigate and manage impacts, it mentions "Whilst hollows were not observed from the ground, there may be some small hollows in the larger trees on site. If hollows are noted during clearance works, the trees are to be marked and fauna ecologist contacted to advise on appropriate works and methodology. The fauna ecologist is to be present whilst any hollows are sectionally dismantled from the selected tree, the hollow checked for fauna occupation, and animal relocated if required. The sectioned off hollow may be re-used as on-ground refugia in the landscaping areas of the site". The following mitigation measures are proposed:- • Prior to clearing a detailed habitat and hollow search is to be undertaken to identify any habitat resources to retain or recover and relocate into the landscape buffers • Planting if native species is to be incorporated into the lands cape design to enhance foraging opportunities • Nest boxes or augmented hollows are installed in trees to enrich the nest and shelter resources for hollow dependent species Table 5.6 "*Measures to mitigate and manage impacts*" has been updated to include the above

		proposed mitigation measures.
BCD requests clarification of the reference to masked owls and nest trees and roosts.	On page 49 of the BDAR there is a reference to masked owl nest trees and roosts. As there are no further references to masked owls or records or surveys, BCD requests clarification of this part of the report. Recommendation 4 BCD requests clarification of the reference to masked owls and nest trees and roosts	There are no nest trees or roosting habitat on site. As such, this reference has been removed.

If you require any further information, please do not hesitate to contact our operations team on (02) 4340 5331 or at servicedesk@traversecology.com.au

Yours faithfully,

Michael Sheather-Reid
Managing Director – ***Travers bushfire & ecology***

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