



William Stimson Public School
Capital Works Programme
Biodiversity Assessment

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Biodiversity Assessment

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1 INTRODUCTION

SLR Consulting was engaged by JDH Architects to undertake a biodiversity assessment to provide Fairfield City Council with further information regarding the redevelopment of William Stimson Public School. The school is located on Lily Street within the suburb of Wetherill Park in western Sydney, NSW (**Figure 1**). The site is known as Lot 1 DP 564629 and is approximately 2.8 hectares in area.

This report aims to identify and discuss potential impacts to biodiversity values within William Stimson School site, and specifically to address the information requested by council.

The report is based on a brief review of available data, mapping, literature and reports, as well as a site inspection conducted by Jeremy Pepper, Principal Ecologist (and author) on 10 January, 2017.

2 EXISTING BIODIVERSITY VALUES

2.1 Overview

The William Stimson School site contains a mosaic of buildings, paved areas, grassed playing fields, planted trees, landscaped areas and areas of native trees. Stands and individuals of trees remain or have been planted in some parts of the site, although the vast majority of the site has been cleared and modified for construction of the school buildings and associated courtyards, playgrounds, car parks and landscaped areas. Parkland containing native trees, grassland and modified woodland adjoins the northern boundary of the site within Shakespeare Park. The southern and eastern boundaries of the site adjoin residences and the western boundary adjoins Lily Street (**Figure 1**).

No areas of land within the site are mapped on the NSW Biodiversity Values Map, although some patches of vegetation are mapped on relevant regional vegetation mapping (see **Section 2.2**).

Neither the site, nor the adjoining land, is mapped as bush fire prone land on the *Fairfield LGA - Bush Fire Prone Land* map (RFS 2003).

2.2 Vegetation Communities

2.2.1 Regional Vegetation Mapping

The original vegetation of the site and the surrounding locality, which would once have comprised a form of dry sclerophyll woodland, has been cleared and removed. Notwithstanding, some small patches of vegetation that have been previously mapped on the site, as follows:

- A large patch of Shale Plains Woodland was previously mapped across most of the northern parts of the site and down through the centre of the site by NPWS (2002), as shown in **Figure 2**; and
- Narrow bands of 'Urban Exotic/Native are mapped by OEH (2016) across the northern boundary, part-way down the western boundary and through the centre of the site (see **Figure 3**).

The occurrence and extent of these vegetation types was verified during the site inspection. Neither of the regional vegetation mapping data sets accurately depicts the extent and type of vegetation on the site.

2.2.2 Urban Exotic/Native

A mixture of local native, non-indigenous native and exotic trees has been planted along the site boundaries and within landscaped areas. These areas can be ascribed to the Urban Exotic/Native vegetation type, as mapped by OEH (2016), although it is noted that several trees and stands of planted trees have not been mapped in the southern parts of the site (**Figure 3**). A single row of trees has evidently been planted along the western boundary (adjoining Lily Street), southern boundary (see **Photo 1**), and parts of the eastern boundary and along the northern boundary, with other trees planted randomly throughout adjoining spaces (**Photo 2**).

Planted tree species include the local native species Spotted Gum *Corymbia maculata*, Forest Red Gum (*Eucalyptus tereticornis*), Narrow-leaved Ironbark (*Eucalyptus crebra*), Grey Ironbark *Eucalyptus paniculata*, Mugga Ironbark (*Eucalyptus sideroxylon*), Prickly-leaved Paperbark (*Melaleuca styphelioides*) and non-indigenous native species such as White Cedar *Melia azedarach*, Yellow Gum *Eucalyptus leucoxylon*, Tallowwood (*Eucalyptus microcorys*), Brush Box (*Lophostemon confertus*), Lemon-scented Gum (*Corymbia citriodora*). Exotic tree species are also present in low abundance including Jacaranda (*Jacaranda mimosifolia*), Chinese Weeping Elm (*Ulmus parviflora*) and Peppercorn Tree (*Schinus areira*).

There are also small pockets of landscaped gardens, containing a mix of trees, shrubs and groundcovers (see **Photo 3** and **Photo 4**). Common species in these areas include Grevillea Robin-Gordon, Gazania, Frangipani, Hibiscus, Agapanthus, *Aloe vera*, Azalea and Box. This vegetation type is not recognised as a native plant community type (PCT) and on this basis, is not likely to provide any important biodiversity values or ecological constraints. However, removal of individual trees within this vegetation type may require assessment by a qualified arborist according to relevant development controls (i.e. LEP and DCP requirements – see **Section 3.2**). It is noted that an arboricultural assessment of the trees within the site has already been undertaken (see Scales 2017).

Photo 1 Row of planted trees (inc. Tallowwood, Forest Red Gum) near the southern boundary



Photo 2 Planted trees (Urban Exotic/Native) in the southwestern corner of the site



Photo 3 Landscaped garden bed, near the western boundary



Photo 4 Landscaped areas near site entrance off Lily Street





2.2.3 Shale Plains Woodland (Cumberland Plain Woodland)

Two patches of vegetation, one in the north-western corner of the site, extending down the western boundary, and another within the centre of the site, can be described as highly modified forms of Shale Plains Woodland (see NPWS 2002), which is endemic to the Cumberland Plain subregion of western Sydney. Although NPWS (2002) map this community across the site, as shown in **Figure 2**, the site inspection revealed that the regional mapping is not accurate and the extent of the vegetation is much less than that which is mapped.

The north-western patch comprises a small stand of Grey Box *Eucalyptus moluccana*, with a modified ground layer that has been landscaped with structures, irrigation system, underground infrastructure (e.g. water main), mulching and planting (see **Photo 5**). There is no evidence of native plants in the understorey and groundcover. Other Grey Box trees are located just south of this area, near the school entrance (on the western site boundary), with an understorey comprising exotic plantings within a landscaped environment, and no native plant species present.

In the centre of the site, there is a patch of Forest Red Gum *Eucalyptus tereticornis* and adjoining patch of Narrow-leaf Ironbark *E. crebra* (**Photo 6**). The understorey is almost entirely absent, with the exception of a small number planted shrubs. The ground layer is highly disturbed and contains a mixture of bare soil, exotic grass and paved areas, indicating this is a high traffic area and therefore natural regeneration of native woodland plants is highly unlikely (without intensive management). It is not clear whether these trees were planted or self-sown from the days of the school construction, but nonetheless, they also represent a highly modified form of Shale Hills Woodland, a form of the threatened community known as Cumberland Plain Woodland.

2.2.4 Threatened Ecological Communities

The patches of Grey Box and Forest Red Gum/Ironbark, represent highly modified examples of the threatened *Cumberland Plain Woodland in the Sydney Basin Bioregion* ('Cumberland Plain Woodland'), which is listed as a 'Critically Endangered Ecological Community' under the NSW *Biodiversity Conservation Act 2016* (BC Act) and under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).



2.3 Weeds

Several environmental weeds were recorded in low abundance on the site and these should be appropriately managed to avoid spreading these species throughout the site and wider local area. Some of these species are listed as 'priority weeds' within the Fairfield local government area under the NSW *Biosecurity Act 2015*. Weed species observed on the site comprise:

- Paddy's Lucerne *Sida rhombifolia*;
- Asthma Weed *Parietaria judaica*;
- African Lovegrass *Eragrostis curvula*;
- Kikuyu *Cenchrus clandestinus*;
- Fireweed *Senecio madagascariensis*;
- Fleabane *Conyza* sp.; and
- Paspalum *Paspalum dilatatum*.

2.4 Fauna Habitat

The biodiversity assessment revealed that the site generally lacks many of the habitat features that are considered to be important for the occupancy of most locally occurring native fauna species. The flowering eucalypts (i.e. Grey Box and Narrow-leaved Ironbark) may periodically provide a limited source of nectar for birds, insects and arboreal mammals. Additionally, the artificial lighting associated with the buildings at night may encourage insects, which may also encourage microbats and other nocturnal insectivorous predatory species to hunt within the site.

Given that the vegetation within the site is highly modified (i.e. generally lacking native midstorey and groundcover species), it is unlikely that the habitat would provide shelter or refugia for fauna species that prefer to occupy dense forest or woodland habitat. The absence of aquatic habitats from the site also excludes the presence of wetland birds and breeding habitat for amphibian species.

In response to submission of a development application for the proposal, Fairfield City Council requested further information regarding the occurrence of threatened species within the site. Specific information was requested regarding the potential presence of an unidentified Owl species within the site. Given that no nocturnal surveys were conducted as part of this biodiversity assessment, the identity of this owl species could not be confirmed. However, the assessment revealed that no habitat trees suitable for nesting occur within the site. This would indicate that only marginal foraging habitat occurs for Owl species.

2.5 Threatened species

A number of threatened plants have previously been recorded within the Fairfield local government area. However, no threatened plants were recorded during the site inspection and given the disturbed nature of the ground layer and evidence of historical and ongoing maintenance and disturbance of these areas it is highly unlikely that any threatened plants occur within the site.

The vegetation and soils of the remainder of the site are either introduced, buried, disturbed or highly modified from their original state and hence do not represent suitable habitat for any threatened plants. Accordingly, the majority of the site is unlikely to support individuals or populations of threatened flora species, considering the highly modified nature of the habitats and ground conditions.

Threatened fauna species with the greatest potential to utilise the site are highly mobile species such as bat and bird species. Micro-bat species could also potentially forage on the site and potentially utilise cavities within the existing tree hollows, buildings, culverts and pipes. Other threatened species likely to forage on the site or may occur in flight over the site periodically include the Swift Parrot, Square-tailed Kite, Grey-headed Flying-fox, Barking Owl and Powerful Owl. The Barking Owl usually roosts in or under dense foliage in large trees, often near watercourses or wetlands. It typically breeds in hollows of large eucalypts or paperbarks, usually near watercourses or wetlands. Home ranges are highly variable and dependent on habitat quality. Home ranges of 225 hectares to 6000 hectares have been recorded for the Barking Owl (NPWS 2003). Powerful Owls are nocturnal, solitary and generally sedentary. Powerful Owls nest in large tree hollows (at least 0.5 m deep), in large eucalypts (diameter at breast height of 80-240 cm) that are at least 150 years old with breeding taking place from late summer to late autumn. Pairs of Powerful Owls are believed to have high fidelity to a small number of hollow-bearing nest trees and will defend a large home range of 400 - 1,450 hectares (Higgins, 1999). Although the site may be frequented by species such as the Barking Owl and Powerful Owl for hunting, the habitat is not considered to be important to the long term survival of these species given that they both hunt across large areas consisting of a network of habitats.



Photo 5 Stand of Grey Box with landscaped understorey, in the northwestern corner of site



Photo 6 Copse of Narrow-leaf Ironbark and Grey Box trees in the central portion of site



3 LEGISLATIVE REQUIREMENTS

3.1 Biodiversity Assessment Method

The *Biodiversity Assessment Method* (BAM) was introduced in NSW as part of the commencement of the BC Act on the 25th August 2017. The BAM applies only to developments that satisfy one or more triggers, including (i) clearing of native vegetation above certain threshold areas (ii) development within areas mapped on the NSW Biodiversity Values Map and (iii) if a 'significant effect' on any threatened species or communities listed under the BC Act is likely. If the BAM applies to a development application, a Biodiversity Development Assessment Report (BDAR) must be prepared. No patches of native vegetation within the site are mapped on the Biodiversity Values Map.

Additionally, any clearing of native vegetation proposed within the site that is greater than the threshold value for the applicable minimum lot size for the zoning of the site under Fairfield Council's *Local Environmental Plan* (LEP) will trigger the application of the BAM and accordingly, a BDAR will be required with the development application. However, based on the small areas of native vegetation identified within the site as part of this assessment, and based on the review of the current development plans for the school (see JDH 2017), it is highly unlikely that the proposed works will clear more than the relevant threshold clearing area of native vegetation.

3.2 Trees

Trees are present throughout the site. At the time of writing, new legislation has recently been enacted in NSW with regard to tree protection in "non-rural" areas. Tree clearing in urban areas that is not part of a development application is now regulated under *State Environmental Planning Policy (Vegetation in Non-rural Areas) 2017*.

An arboricultural assessment of all trees has been prepared for the proposed development (see Scales 2017).

3.3 Weeds (Biosecurity Act)

All plants in NSW are regulated under the *Biosecurity Act* with a general biosecurity duty to prevent, eliminate or minimise any biosecurity risk they may pose. Any person who deals with any plant, who knows (or ought to know) of any biosecurity risk, has a duty to ensure the risk is prevented, eliminated or minimised, so far as is reasonably practicable. The Act requires landowners to control listed priority weeds according to the level of threat posed by the species of weed. Specific control measures apply for certain priority weeds. Numerous priority weeds are listed for Fairfield local government area, some of which occur on the site (e.g. African Olive).

4 IMPACT ASSESSMENT

4.1 Tree Removal

The development will involve additions and alterations to the existing school including the demolishing and removal of buildings. The development will also require the removal of up to sixteen high category trees and two low category trees. The majority of these trees are native species, although some have been planted as ornamentals.

4.2 Removal of Fauna Habitat

Due to a lack of fauna habitat within the subject site, fauna habitat removal will mainly consist of the removal of mature trees, including myrtaceous species, which may be suitable feed trees for arboreal fauna and woodland bird species. No hollow-bearing trees or other significant habitat features will be removed.

None of the habitat features within the subject site are considered to be important to the long-term survival of fauna species within the locality. The removal of marginal foraging habitat is therefore considered to be negligible.

4.3 Endangered Ecological Communities

The Arboricultural Impact Appraisal and Method Statement (Scales 2017) identifies sixteen high category trees and two low category trees that would be required to be removed for the proposal. These trees comprise the following native species:

- Forest Redgum *Eucalyptus tereticornis*;
- Grey Box *Eucalyptus moluccana*;
- Grey Ironbark *Eucalyptus paniculata*;
- Mugga Ironbark *Eucalyptus sideroxylon*;
- Prickly-leaved Paperbark *Melaleuca styphelioides*;
- Rough-barked Apple *Angophora floribunda*;
- Spotted Gum *Corymbia maculata*; and
- Tallow Wood *Eucalyptus microcorys*

In accordance with the NSW Scientific Committee's final determination for *Cumberland Plain Woodland in the Sydney Basin Bioregion* ('Cumberland Plain Woodland'), tree species commensurate with the community include Grey Box *Eucalyptus moluccana*, Forest Red Gum *E. tereticornis*, Narrow-leaved Ironbark *Eucalyptus crebra*, *Eucalyptus eugenioides* and Spotted Gum *Corymbia maculata* (ref). An examination of the tree schedule within Appendix 2 of the Arboricultural Impact Appraisal and Method Statement (Scales 2017) indicates that only five trees of these species will be removed as a result of the proposal. The field assessment determined that vegetation commensurate with the community occurs within two patches, one in the north-western corner of the site, extending down the western boundary, and another within the centre of the site.

An assessment of significance, pursuant to Section 7.3 of the NSW BC Act, for the removal of *Cumberland Plain Woodland in the Sydney Basin Bioregion* is presented in **Appendix A**. This assessment determined that a significant effect on the community is unlikely due to the following:

- The CEEC within the site is in low condition and highly fragmented;
- The proposal will not isolate or fragment habitat for the CEEC within the site or wider locality; and
- The proposal will not adversely affect habitat critical to the survival of the CEEC.

4.4 Impacts on Threatened Species

Threatened fauna species with the greatest potential to utilise the site are highly mobile species including bat and bird species. Threatened micro-bat species could also potentially forage on site and potentially utilise cavities within existing buildings, culverts and pipes in the locality. None of the habitat features within the subject site are considered to be important to the long-term survival of threatened fauna species within the locality. The removal of marginal foraging habitat for these species is therefore considered to be negligible.

4.5 Impacts on EPBC Act Protected Matters

The Cumberland Plain Woodland within the site is also commensurate with the EPBC Act listed community *Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest*. An assessment of the potential to impact this community determined that five trees commensurate with the community will be removed by the proposed development.

Given the highly degraded nature of the subject site, it is unlikely that the habitats present within the subject site are important to any other EPBC Act matters.

5 RECOMMENDATIONS

The following recommendations are considered necessary to protect the biodiversity values within the site:

- Priority and environmental weeds present in several locations within the site should be managed according to the latest recommended control methods;
- Impacts on native vegetation should be avoided wherever possible. This would involve avoiding development within the tree protection zone of the existing Grey Box and Narrow-leaved Ironbark trees located in the central and northwestern portions of the site, being highly modified remnants of the Cumberland Plain Woodland threatened community (refer to the Project Arborist Report for advice on tree protection zone requirements); and
- Ensure retained stands of native Cumberland Plain Woodland trees are managed to ensure adequate (i.e. natural) groundcover conditions and minimisation or exclusion of pedestrian access within the tree protection zones of the trees, to minimise risks to school users and to ensure ongoing tree health and safety (see Scales 2017). This could involve careful planting and management of groundcover and shrub layer vegetation beneath native trees to introduce locally indigenous plant species to these areas but avoiding accumulation of fire fuels.

6 CONCLUSION

Most of the site is not constrained by the presence of threatened biodiversity, and provided the mitigation measures above are implemented, ecological impacts are likely to be minimal. However, two main areas of high biodiversity constraint exist within the site, associated with small and highly modified remnants of Cumberland Plain Woodland (a critically endangered community), as noted above. An *assessment of significance* pursuant to Section 7.3 of the NSW BC Act, concludes that the proposed redevelopment is unlikely to have a significant effect on Cumberland Plain Woodland (a critically endangered community) based on the following:

- The CEEC within the site is in low condition and highly fragmented;
- The proposal will not isolate or fragment habitat for the CEEC within the site or wider locality; and
- The proposal will not adversely affect habitat critical to the survival of the CEEC.

7 REFERENCES

Higgins, P.J. (ed) (1999). Handbook of Australian, New Zealand and Antarctic Birds. Volume 4: Parrots to Dollarbird. Oxford University Press, Melbourne.Heritage.

NSW National Parks and Wildlife Service (2003) Draft Recovery Plan for the Barking owl (*Ninox connivens*). NSW NPWS, Sydney.

OEH (2016) *The Native Vegetation of the Sydney Metropolitan Area - Version 3. VIS_ID 4489*. NSW Office of Environment and Heritage, Sydney.

RFS (2003) *Fairfield LGA - Bush Fire Prone Land* map. Rural Fires Service, Sydney.

Scales, A (2017) *Arboricultural Impact Assessment and Methods Appraisal*. Prepared for William Stimson Public School. Naturally Trees, Elanora Heights, NSW.

Assessment of Significance, pursuant to Section 7.3 of the NSW BC Act for *Cumberland Plain Woodland* in the *Sydney Basin Bioregion CEEC*

- a) *in the case of a threatened species, whether the proposed development or activity is likely to have an adverse effect on the life cycle of the species such that a viable local population of the species is likely to be placed at risk of extinction,*
-

Not applicable to the CEEC

- b) *in the case of an endangered ecological community or critically endangered ecological community, whether the proposed development or activity:*
-

- i) *is likely to have an adverse effect on the extent of the ecological community such that its local occurrence is likely to be placed at risk of extinction, or*
-

The proposal will involve the removal of five trees which form part of the Cumberland Plain Woodland CEEC. Disturbance of the groundcover will mainly affect exotic species such as African Lovegrass *Eragrostis curvula*, Kikuyu *Cenchrus clandestinus* and Paspalum *Paspalum dilatatum*.

The vegetation community within the site is in low condition due to management practises such as frequent mowing of the groundcover which has encouraged the establishment of exotic grasses. The encroachment of weeds has also been facilitated by edge effects and due to the near proximity of residential development.

The extent of the CEEC in the locality is restricted to small patches, north-western corner of the site, extending down the western boundary, and another within the centre of the site. The proposed action is therefore unlikely to reduce the extent of the community such that its local population is likely to be placed at risk of extinction.

- ii) *is likely to substantially and adversely modify the composition of the ecological community such that its local occurrence is likely to be placed at risk of extinction,*
-

The removal of five trees and exotic ground cover species will not significantly modify the composition of the CEEC within the locality such that its local occurrence is likely to be placed at risk of extinction.

- c) *in relation to the habitat of a threatened species or ecological community:*
-

- i) *the extent to which habitat is likely to be removed or modified as a result of the proposed development or activity, and*
-

The proposal will involve the removal of five trees and exotic ground cover species within the site.

- ii) *whether an area of habitat is likely to become fragmented or isolated from other areas of habitat as a result of the proposed development or activity, and*
-

The distribution of the CEEC within the site is already highly fragmented due to previous vegetation clearing activities and ongoing management of vegetation surrounding the school buildings. The proposal will involve the removal of vegetation in the north-western corner of the site, extending down the western boundary, and another within a patch in the centre of the site. No significant habitat will be fragmented as a result of the proposal.

- iii) *the importance of the habitat to be removed, modified, fragmented or isolated to the long-term survival of the species or ecological community in the locality,*
-

The CEEC is in low condition due to a lack of native plant diversity and habitat features such as woody debris or hollow bearing trees. Additionally, the CEEC is highly fragmented and dominated by exotic plant species. The CEEC vegetation is therefore considered to have low importance to the long-term survival of the CEEC in the locality,

- d) *whether the proposed development or activity is likely to have an adverse effect on any declared area of outstanding biodiversity value (either directly or indirectly),*
-

No areas of outstanding biodiversity value are identified within the site or within near vicinity. Direct or indirect impacts to areas of outstanding biodiversity value are therefore highly unlikely to occur as a result of the development.

- e) *whether the proposed development or activity is or is part of a key threatening process or is likely to increase the impact of a key threatening process.*
-

The following KTP is of relevance to the CEEC:

- Clearing of native vegetation.

The proposed action is likely to increase the impact of this KTP to a minor extent as a result of the removal of five trees.

Assessment of Significance, pursuant to Section 7.3 of the NSW BC Act for *Cumberland Plain Woodland* in the *Sydney Basin Bioregion CEEC*

Conclusion of Assessment of Significance

The proposal is unlikely to have a significant effect on the EEC due to the following:

- The CEEC within the site is in low condition and highly fragmented;
 - The proposal will not isolate or fragment habitat for the CEEC within the site or wider locality; and
 - The proposal will not adversely affect habitat critical to the survival of the CEEC.
-