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Via email: jason@jwplanning.com.au

Subject: Review of Ecology Report and Hollow-bearing Tree mapping for 87 Oakdale Road, Gateshead

I refer to your request for an independent review of a discrepancy identified in an Ecological Assessment for 86 Oakdale Road, Gateshead. The assessment was carried out by South Coast Ecology (SCE) (ref: SCE0012 dated 30 September 2022) as part of a planning proposal to rezone the land to an industrial use. I understand there is a discrepancy in the reporting of hollow-bearing trees on the two (2) parcels of land that comprise the site.

The assessment was for two (2) areas of land being 86 Oakdale Road and the adjoining road reserve as illustrated in an extract from the SCE (2022) report.



Figure 1: The Site (extract from SCE 2022)

As a general comment, I can confirm that the assessment report addressed relevant matters raised by the *Biodiversity Conservation Act 2016* (BC Act), State Environmental Planning Policy (Koala Habitat) and *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This is an appropriate regulatory framework for the consideration of impacts on ecological values.

Field surveys were completed in accordance with guidelines over three seasons in 2021 and 2022. This included flora and fauna surveys to aid in the mapping of ecological values such as plant community types and hollow-bearing trees.

In relation to the mapping of hollow-bearing trees, SCE (2022) report seven (7) trees with hollows suitable for glider use (see p 5 of SCE 2022). This hollow-bearing tree count is contradicted on p7 of SCE (2022) where it is reported that ten (10) trees are hollow-bearing comprising a total of 28 hollows. The map of hollow-bearing trees provided in SCE (2022) is provided below showing the location of nine (9) hollow-bearing trees.

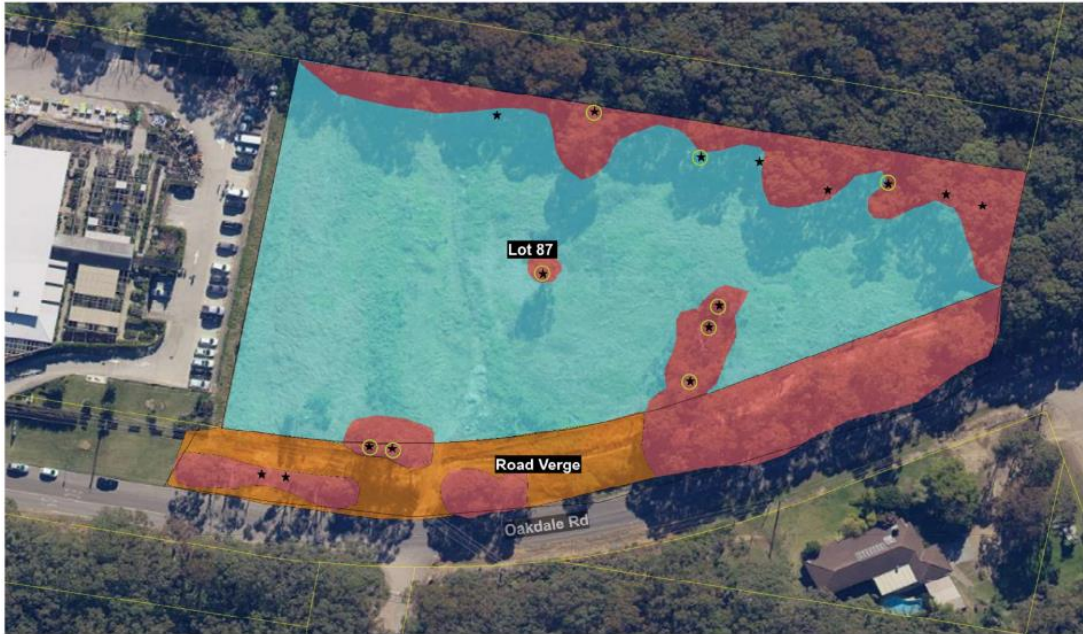


Figure 2: Tree Hollows (extract from SCE 2022)

A separate independent site inspection was performed on 11 February 2023 to review the hollow-bearing tree mapping reported in SCE (2022). This survey identified only five (5) trees with hollows of differing kinds (i.e. typical hollows through to cracks and fissures), which may be used by gliders and bats as outlined in the SCE (2022) report. The location of the five (5) hollow-bearing trees is shown as red circles in Figure 3.

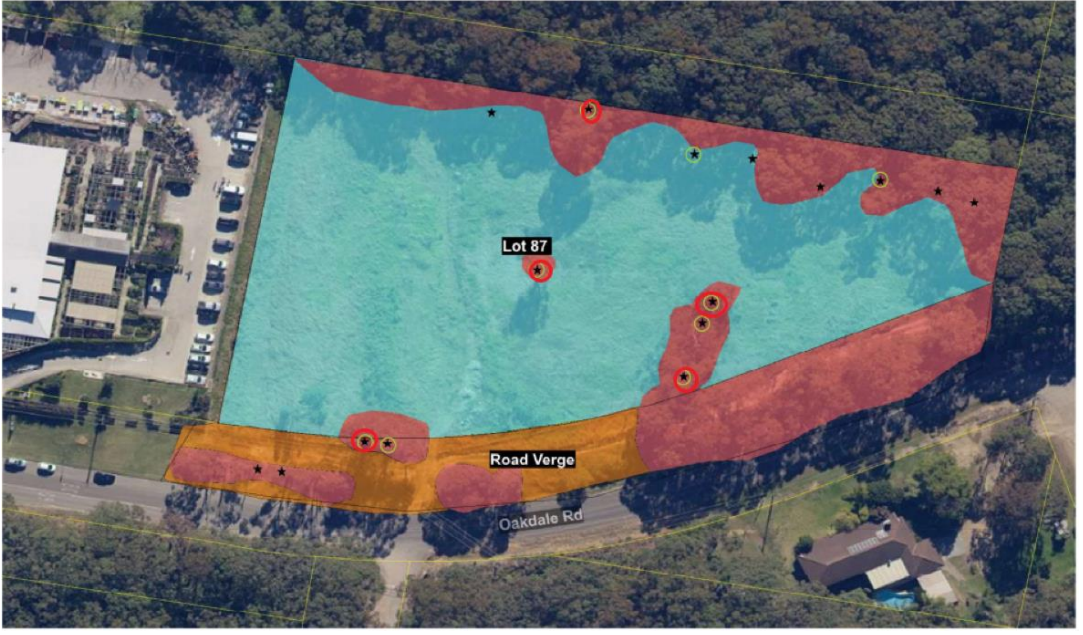


Figure 3: Tree Hollows observed on 11 February 2023 (red circles)

It is acknowledged that the identification of hollow-bearing trees from the ground can vary between observers which can be a function of experience levels. This could be the reason for the differing hollow-bearing tree count results reported in the SCE (2002) as I was made aware of multiple field observers being used by SCE to complete site investigation. I have made the observations based on 27 years' experience.

The observation of five (5) hollow-bearing trees is less than all the counts specified in the SCE (2022) report. It is likely that this lower count relates to variation in observer as I did note some trees with dead branches but did not count them as hollow-bearing. Other observers may be less conservative and correspondingly denote these as hollow-bearing. I did not denote these trees as hollow-bearing as they were incapable of supporting gliders and/ or microchiropteran bat species; these being the two fauna cohorts correctly identified in SCE (2022) potentially using hollows on the site.

As the basis for impact assessment, it appears the SCE (2022) has reported a greater number of hollow-bearing trees than appear to be present on the site. On this basis, I consider the assessment presented by SCE (2022) to be conservative and therefore do not consider any of the conclusions reached as being unsupported. If anything, the assessment has assessed a greater impact on arboreal mammals than is likely expected.

The recommendations provided in the assessment are appropriate, notably the need to avoid and minimize impacts. Should the assessment performed at the development application stage identify an exceedance in the biodiversity offset scheme, then compensatory measures would be required to address residual impacts. SCE (2022) correctly conclude that this can only be determined during the consideration of a detailed development application for the site.

In closing, it is considered that this discrepancy in hollow-bearing tree numbers reported by SCE (2022) is not of a kind or magnitude that undermines the assumptions made in their assessment. In fact, fewer hollow-bearing trees were observed during the February 2023 site inspection indicating that the impact assessment provided by SCE (2022) was conservative and considered a greater than expected impact on gliders and/ or microchiropteran bat species. I consider the conclusions and recommendations are appropriate and provide sufficient guidance for the consideration of the planning proposal and the implications of future development on the land.

Regards



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