

Flora and Fauna Surveys, Biodiversity and Ecological Impact Assessment & Bushland Plans of Management Services Australian Company Number (ACN) 154 491 120 Australian Business Number (ABN) 24 154 491 120 3/28 Tullimbar Road, Cronulla NSW. 2230 Tel: 9527 5262; Mob: 0403 081 902

Simon Downes Peter Downes Designs Pty Ltd 77 Riviera Avenue AVALON BEACH NSW 2107

## Re - Impacts to vegetation mapped on the Biodiversity Values Map at 31 - 33 Sturdee Lane, Elvina Bay

We understand that a small section of otherwise mostly cleared bushland (Figure 1) is subject to some potential impacts resulting from the installation of a proposed inclined lift (inclinator) at the subject land at 31- 33 Sturdee Lane, Elvina Bay (Figure 2). This small area of mostly cleared vegetation has been mapped as containing biodiversity value on the BV Map generated by DPE (2025) (Figure 3).

It appears, however, that the vegetation component within the mapped area would have a minimal impact in relation to providing access to the proposed railcar. An individual of naturally occurring Giant Water Vine (*Cissus antarctica*) (Figure 4), and some individuals of Blue Flax Lily (*Dianella caerulea*) and Spiny-headed Mat-rush (*Lomandra longifolia*) (Figure 4) may have some impacts of shading due to the proximity of the railcar tracks.

However, these impacts are considered minimal and can readily be mitigated by planting more individuals of these common species, derived from local provenance, adjacent to the railcar tracks to maintain population numbers and vegetative integrity in a vegetation array that has been previously highly degraded.

One small individual of Firewheel Tree (*Stenocarpus sinuatus*) that requires removal (Tree No. 3 in Temporal Tree Management (2024) (Figure 1) is not native to the local area (native to the North Coast of NSW) and removal of this individual would not impact on local flora comprising Hunter Coast Lowland Spotted Gum Moist Forest (PCTID: 3234). An individual of such canopy species as Broad-leaved Mahogany (*Eucalyptus umbra*), derived from local provenance, planted in the subject area would adequately mitigate against the removal of this individual of Firewheel Tree.

As such, it is considered that the application does not require a BDAR or assessment using the BAM (2020) in relation to very minor impacts to the few common components of the potentially occurring TEC vegetation (specifically Hunter Coast Lowland Spotted Gum Moist Forest: PCTID: 3234), that may occur in relation to the BV mapping.

As such, replanting individuals of these 4 commonly occurring species from stock pots and tubestock available from local nurseries, would maintain the current integrity of the degraded vegetation at the subject site.

Yours faithfully

1. Stricker

P Stricker 23.05.2025

Director & Principal Ecologist ACS Environmental P/L 3/28 Tullimbar Road, CRONULLA NSW 2230 AUSTRALIA **Phone:** + 61 2 9527 5262. **Mobile:** 0403 081 902



**Figure 1** - Tree No. 3 (Temporal Tree Management 2024) is an individual of Firewheel Tree (*Stenocarpus sinuatus* (top central in image) that would be removed as part of the inclinator development required to provide access to the proposed railcar. Replacement planting of an individual of Broad-leaved Mahogany (*Eucalyptus* umbra) in suitable areas of the subject land is recommended for mitigation actions to the removal of the individual of Firewheel Tree.



Figure 2 - Proposed location of inclined lift to service properties at 31 - 33 Sturdee Lane, Elvina Bay (Peter Downes 2024).



**Figure 3** - Biodiversity Values Mapping (light purple shading) across a small section of the subject land (blue dot) where the rail tracks would be installed, the biodiversity value representing individuals of Spotted Gum and Broad-leaved Mahogany which would not, in any way, be impacted by the construction and use of the inclined lift (DCCEEW 2025)



**Figure 4** - Native plant species that may be impacted by the construction and operation of the inclined lift include the common species Giant Water Vine (central in image) and individuals of Blue Flax Lily and Spiny-headed Mat-rush