

28 February 2017

Department of Planning and Environment, Land Release
GPO Box 39
Sydney NSW 2001

Submitted via DPE website

Re: The Ingleside Precinct

BirdLife Australia is an independent science-based conservation organisation with more than 12,000 members and 85,000 supporters throughout Australia. We have an extensive ongoing program of bird conservation research and a range of citizen science projects that engage thousands of Australians. Our primary objective is to conserve and protect Australia's native birds and their habitat.

Since 2011, citizen scientists have helped collect critical data on Sydney's Powerful Owl (*Ninox strenua*) population as part of BirdLife Australia's Powerful Owl Project (<http://www.birdlife.org.au/projects/powerful-owl-project>). The information gained from this study is used to inform the conservation status of the Powerful Owl, and to develop management recommendations for their continued survival in urban areas. Powerful Owl is listed as Vulnerable under the *Threatened Species Conservation Act 1995*.

Thank you for the opportunity to comment on the Ingleside Precinct.

BirdLife Australia has serious concerns that the proposed development will impact on important Powerful Owl habitat within Ingleside Precinct (the **Precinct**) through direct removal of habitat, including nesting hollows, and increased disturbance and predation.

At least three pairs are known to have territories within or adjacent to the Precinct. A breeding pair holds a territory containing a known nest tree within the southern end of the Precinct and a second pair holds a territory within 500 m of the north-eastern margin of the Precinct.

Sydney's Powerful Owl population is highly vulnerable to the ongoing, incremental loss of breeding and foraging habitat. Any development in the Precinct must be informed by detailed studies of the foraging and breeding habits of Powerful Owls resident in the Precinct and surrounding area.

BirdLife Australia has developed guidelines for land managers in the Sydney area that can be used to inform development within the Precinct. However we are also keen to have direct input into any studies of the species in the area and in the formulation of strategies to mitigate impacts on this Vulnerable species.

For further information, please contact our Powerful Owl Project Officer, Beth Mott (beth.mott@birdlife.org.au or 0403 189 377).

Yours sincerely



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Background

Information obtained from the six-year Powerful Owl Project has found that the Precinct is within the boundaries of a known Powerful Owl breeding territory. The southern owl pair within the site boundary had a failed breeding attempt between May and August 2016, and this and a second pair of Powerful Owls have been recorded as resident within the slopes and gullies along the entire eastern margin of the Precinct since 2013.

The breeding territory of a third pair of Powerful Owls sits within 1.3 kilometres of the Precinct, and this territory produced two chicks in 2016.

The wooded creek line is likely to be of high importance for all three pairs of Powerful Owls, as a jumping off point for foraging in the suburbs east of the Precinct, and a stepping stone to more connected forested land on the west of the Precinct in Garigal and Ku-Ring-Gai National Parks. Further, the creek line and wooded slopes provide a green corridor representing a significant landscape feature of the area for dispersing young owls and for movement of all owls through the landscape. Recent work conducted by the Powerful Owl Project in conjunction with the University of Sydney confirms that urban greenspaces within territories are very heavily used by urban owls.

The southern pair of Powerful Owls is significantly at risk by the area of proposed development, as unpublished data from the Powerful Owl project has recorded multiple instances where disturbance within 500 metres of the nest tree has resulted in abandonment of this tree.

The removal of trees, particularly those bearing hollows, at the subject site has strong potential for impact on the persistence of Powerful Owls in the Ingleside area. Tree hollows are essential for many of the possum species Powerful Owls rely heavily on as prey. Unless long-term calculations of owl foraging habitat area and prey density are carried out, we can only assume that tree removals within core territory will be likely to reduce the available foraging habitat for the resident pair of Powerful Owls.

Tree removals may also influence roost site use.

Any light pollution arising from the development within the core territory could also negatively affect owls by influencing movement patterns, and light is known to change the movement of other species of owls. These pressures combined have definite potential to negatively affect owl persistence within the territory.

The threshold guidelines for development within and around Powerful Owl territories are outlined below and more information can be found in '*Land Manager Guidelines for Powerful Owl Conservation in Urban Sydney*' by Dr David Bain, BirdLife Australia' (requests for this document can be made to BirdLife Australia).

- For foraging, Powerful Owls require forest, woodland and complex urban vegetation suitable for arboreal prey species. Habitat patches greater than 1 ha where patch is any contiguous area of foraging vegetation separated by gaps less than about 50 m.
- Includes: all treed vegetation with >10 habitat trees (any hollow size) per hectare or >3 trees over 70 cm DBH per hectare; complex urban vegetation (including planted vegetation) with dense vegetation of mid-storey and/or canopy,



including parks and residential backyards suitable for movement of urban adapted arboreal fauna (e.g. Common Ringtail Possum).

- Retain a minimum 450 ha in a maximum of 4 patches within the territory (2 km radius around a nest site or roosting site). Proposals to remove >1 ha of foraging habitat within 2 km of a nest site (including staged proposals), where the remaining habitat in this area is below the minimum 450 ha vegetation retention threshold, need to be carefully considered and justified with regard to significance assessment (Section 5A, *Environmental Planning and Assessment Act 1979*).

Other impacts on the local population of Powerful Owls, including the nearby breeding pair, include:

- Predation by cats. It is known that cats prey upon young Powerful Owls as they are fledging from their nests. It is well documented that increased urban development leads to an increase in cat predation on native species (including Ringtail possums, a major food source for Powerful Owls). Any recommendations for not allowing cats within the development needs to be included as a condition of consent and placed as a covenant on the title of the lots.
- Loss of native plants. Only local providence native plants should be used for landscaping. This will go some way to help minimise the impacts to threatened species by replacing where possible the native vegetation, habitat and potential food resources removed.
- Loss of hollow-bearing trees. Retention of hollow-bearing trees is essential. These are critical habitat components for a healthy prey population and hence a healthy Powerful Owl population.