

Tahlia Alexander  
Principal Planning Officer  
Infrastructure Assessments  
Department of Planning, Industry and  
Environment

Our ref: DOC21/867736  
Your ref: SSD-14394209

11 October 2021

Dear Ms Alexander

**Subject: Bungendore High School SSD 14394209**

We have reviewed the Biodiversity Development Assessment Report (BDAR) by Kleinfelder Australia Pty Ltd dated 17 August 2021 submitted with the application for the above proposal and support the measures to mitigate impacts on biodiversity values during construction. These should be included as conditions of approval. In addition, Biodiversity and Conservation Division (BCD) also recommend the following measures to mitigate the ongoing indirect impacts of the development on the riparian values of Turallo Creek:

- 1) All agricultural activities must be restricted to the approved development footprint. A 60m (60m buffer) separation from Turallo Creek is to be maintained for the life of the development such that there shall be no encroachment of agriculture, gardens or livestock into the 60m buffer.
- 2) A pollution bund or some form of pollution control is to be constructed and maintained around the agricultural plot boundary to restrict the discharge and overland flow of effluent and nutrient discharge from the site.
- 3) As part of the landscaping and groundskeeping, we also recommend that the area between the plot and Turallo Creek is maintained in a weed free state for the life of the development.

Please note for future reference that BDAR's need to be submitted to the consent authority within 14 days from the date it is signed by the accredited assessor. Further detailed comments are provided as Attachment 1.

If you would like to discuss this matter further, please contact Angela Jenkins, Senior Conservation Planner, South East, BCD on 02 6229 7075 or at [rog.southeast@environment.nsw.gov.au](mailto:rog.southeast@environment.nsw.gov.au).

Yours sincerely



**MICHAEL SAXON**  
Director South East  
Biodiversity and Conservation Division

## **Attachment 1 – More detailed comments regarding biodiversity**

### **BDAR currency (s6.15 BC Act)**

The BDAR by Kleinfelder Australia Pty Ltd (dated 17 August 2021) has not been submitted to the consent authority within the required 14 day period. Nevertheless, BCD have reviewed the contents of the report and the EIS and are satisfied that the development has not been altered post the BDAR date of finalisation.

### **BAM assessment:**

The BDAR has adequately assessed the direct impacts of the development and demonstrated the proposal avoids and minimises direct impacts on Biodiversity Values. This is reflected by the resulting nil Biodiversity offset requirement/obligation.

The BDAR makes a number of recommendations to reduce indirect impacts during construction which are supported by BCD including:

- Clearly delineation of boundaries of the Development Site to ensure no accidental incursions within retained vegetation.
- Identify and clearly mark 'No-Go Zones' (retained vegetation and site boundary).
- Ensure vehicle and equipment parking areas and stockpile areas are identified and sited to avoid areas containing ecological value wherever practicable
- Sediment and erosion controls
- Pre clearing surveys
- Weed wash down of vehicles- and removal of all waste

The BDAR however provides limited consideration of the ongoing indirect impacts that may be associated with the school's proposed agricultural plot on Turallo Creek post construction and during operation. Consequently, no recommendations for long term protection of the creek's riparian values are provided. Turallo Creek was not surveyed or included in the study area, however it is situated 60m from the plot boundary and is fed by a drainage line that crosses the agricultural plot.

Although there will be a 60m buffer, the plot is considered likely to comprise intensive agriculture and will have the potential to generate offsite impacts such as waste, nutrient and effluent discharge via the drainage line directly into Turallo Creek that may lead to degradation of riparian values. These impacts are not considered or addressed by the BDAR or EIS.

The EIS provides little detail of what the agricultural plot will comprise, other than that the plot will be surrounded by 2.1m high chain wire fencing.

BCD acknowledge that the development provides a 60m buffer to the watercourse, however safeguards to mitigate these ongoing impacts and ensure that the buffer is maintained for the life of the development should be provided.

### **Recommendations**

BCD recommend that all activities are restricted to the approved development footprint and that the 60m (60m buffer) separation from the riparian habitats is maintained for the life of the development- i.e. there shall be no encroachment of agriculture, gardens or livestock into the 60m buffer.

We also recommend a pollution bund or some form of pollution control to be constructed and maintained around the plot to restrict the discharge and overland flow of effluent and nutrient discharge from the site.

As part of the landscaping and groundskeeping, we also recommend that the area between the plot and Turallo Creek is maintained in a weed free state for the life of the development.