



BDAR Waiver Request

72 and 82-86 Menangle Road, Camden

Homes NSW

4 Parramatta Square, 12 Darcy Street, Parramatta
NSW 2150

Prepared by:

SLR Consulting Australia Pty Ltd

SLR Project No.: 630.032888.00001

18 May 2026

Revision: 1.0

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1.0	18 May 2026	Ashleigh Rosenkranz & Gregg Goldin	Mikael Peck	Mikael Peck

Basis of Report

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Homes NSW (the 'Proponent'). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Proponent. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Proponent and others in respect of any matters outside the agreed scope of the work.



Executive Summary

This Biodiversity Development Assessment Report (BDAR) Waiver Request has been prepared by SLR Consulting Australia Pty Ltd (SLR) as part of the Environmental Impact Statement (EIS) for a State Significant Development (SSD) application and concurrent rezoning for a social and affordable housing development at 72 and 82-86 Menangle Road, Camden NSW (the 'subject site').

The subject site is located at 72 and 82-86 Menangle Road, Camden, in the Camden Local Government Area (LGA) and has a combined site area of 7,184sqm.

The SSD application (SSDA) seeks approval for the construction of two residential flat buildings comprising a total of 95 social and affordable housing dwellings (the 'project').

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) relevant to biodiversity issued for the project (SSD-116982991) on 11 May 2026. Section 7.9 of the *NSW Biodiversity Conservation Act* 2016 requires all development applications for SSDs to be accompanied by a BDAR, unless both the Planning Agency Head and the Environment Agency Head determine that the project is not likely to have any significant impact on biodiversity values.

On the basis of our investigations, we believe that the preparation of a BDAR is not necessary, due to the low likelihood of impacts to biodiversity values and that the project meets the criteria for a BDAR waiver to be granted.



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Acronyms and Abbreviations

Short Form	Short Form Long Form
BAM	Biodiversity Assessment Method
BAM-C	Biodiversity Assessment Method Calculator
BC Act	<i>Biodiversity Conservation Act 2016 (NSW)</i>
BC Regulation	<i>Biodiversity Conservation Regulation 2017 (NSW)</i>
BDAR	Biodiversity Development Assessment Report
BOAMS	Biodiversity Offsets and Agreement Management System
BOS	Biodiversity Offsets Scheme
CEEC	Critically endangered ecological community
DBH	Diameter at Breast Height over bark
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cwlth)</i>
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EEC	Endangered Ecological Community
HTW	High Threat Weed
IBRA	Interim Biogeographic Regionalisation for Australia
LLS Act	<i>Local Land Services Act 2013 (NSW)</i>
MNES	Matters of National Environmental Significance
NPW Act	<i>National Parks and Wildlife Act 1974 (NSW)</i>
NSW	New South Wales
Proponent	Homes NSW
PCT	Plant Community Type
TEC	Threatened ecological community



1.0 Introduction

This Biodiversity Development Assessment Report (BDAR) Waiver Request has been prepared by SLR Consulting Australia Pty Ltd (SLR) as part of the Environmental Impact Statement (EIS) for a State Significant Development (SSD) application and concurrent rezoning for a social and affordable housing development at 72 and 82-86 Menangle Road, Camden NSW (the 'subject site').

The subject site is located at 72 and 82-86 Menangle Road, Camden, in the Camden Local Government Area (LGA) and has a combined site area of 7,184sqm.

The SSD application (SSDA) seeks approval for the construction of two residential flat buildings comprising a total of 95 social and affordable housing dwellings (the 'project').

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) relevant to biodiversity issued for the project (SSD-116982991) on 11 May 2026. The relevant SEARs requirement (Item 16. Biodiversity) is provided below in *italics*.

Unless a waiver has been granted, provide a Biodiversity Development Assessment Report (BDAR) that assesses any biodiversity impacts associated with the development in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020

OR

If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.

1.1 Assessment Requirements for State Significant Development

The project is seeking approval as an SSD under Part 4 Division 4.7 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act). The purpose of this document is to provide the information requirements as set out in Table 1 and Table 2 of *How to apply for a biodiversity development assessment report waiver* (DPIE 2019).

Section 7.9 of the NSW *Biodiversity Conservation Act 2016* (BC Act) requires all development applications for SSDs to be accompanied by a BDAR unless both the Planning Agency Head and the Environment Agency Head determine that the project is not likely to have any significant impact on biodiversity values.

1.2 Waiver of Requirement to Prepare a BDAR

Section 7.9 of the BC Act indicates that there are some circumstances in which the Planning Agency Head and the Environment Agency Head will determine that a project is not likely to have a significant impact on biodiversity values and as such, a BDAR is not required to be prepared. Biodiversity values are defined under the BC Act and the *Biodiversity Conservation Regulation 2017* (BC Regulation), and include:

- *Vegetation integrity - being the degree to which the composition, structure, and function of vegetation at a particular site and the surrounding landscape has been altered from a near natural state.*



- *Habitat suitability - being the degree to which the habitat needs of threatened species are present at a particular site.*
- *Threatened species abundance - being the occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site.*
- *Vegetation abundance - being the occurrence and abundance of vegetation at a particular site.*
- *Habitat connectivity - being the degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range.*
- *Threatened species movement - being the degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle.*
- *Flight path integrity - being the degree to which the flight paths of protected animals over a particular site are free from interference; and*
- *Water sustainability - being the degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.*

For a BDAR waiver to be applied for future development of the subject site, it needs to be demonstrated that the above listed biodiversity values will not be significantly impacted. BDAR waiver request information requirements are set out in Table 1 below, as per Table 1 of *How to apply for a biodiversity development assessment report waiver* (DPIE 2019).

Table 1 BDAR waiver request information requirements

Type	Requirements	Responses
Administration	<i>Proponent name and contact details.</i>	Proponent: Homes NSW Contact Name: Mark Withnall Development Lead – HAFF Program Phone: 0499 024 064 Email: mark.withnall@homes.nsw.gov.au
	<i>Project ID (Information to identify which SSD or SSI project the request relates to and where the project is up to in the assessment process).</i>	SSD-116982991.
	<i>Name and ecological qualifications of persons completing Table 2.</i>	Table 2 in <i>How to apply for a biodiversity development assessment report waiver for a Major Project Application</i> (DPIE 2019) is referenced as Table 5 in this report and primarily authored by Ashleigh Rosenkranz. Ashleigh is a project ecologist and has a Bachelor of Environmental Science and Management (UoN, 2024).



Type	Requirements	Responses
		The secondary author is Gregg Goldin. Gregg is an Associate Botanist and has a Bachelor of Science (Honours) (University of Sydney, 1995) and a Master of Science (Australian National University, 2002). Gregg is a Biodiversity Assessment Method (BAM) Accredited Assessor (Greencap, 2019) and reaccreditation (Greencap, 2021). The reviewer of this report and Table 5 is Mikael Peck. Mikael is a Principal Ecologist with a Bachelor of Science (Washington State University, 2005) and Master of Marine Science and Management (Macquarie University, 2013). Mikael is a BAM Accredited Assessor (Muddy Boots, BAAS19002).
Site details	<i>Street address, lot and DP, local government area</i>	The subject site is located within the Camden LGA and comprises the following street addresses and land parcels: • 72 and 82-86 Menangle Road, Camden, NSW • Lot/DP: 73/21405, 74/21405, 75/21405, 76/21405, 77/21405, 86/21405, 1/24039, 2/24039, 3/24039
	<i>Description of existing development site, i.e., the area of land that is subject to the project application. If any part of the land is considered 'Category 1 – Exempt Land' information must be provided to demonstrate how the land meets the criteria 3 that applies to Category 1 – Exempt Land</i>	The subject site is currently developed and comprises of three single storey residential dwellings, a vacant nurses' quarters building and an associated carparking area. The subject site is located directly opposite Camden Hospital. A site inspection undertaken by SLR ecologists confirmed the presence of tree and shrub species listed in the Tree Retention Value Plan (Arterra, 2025). One tree listed in the plan as T11 Spotted Gum (<i>Corymbia maculata</i>) was determined to be a planted hybrid species of <i>C. maculata</i> and <i>C. citriodora</i>. Hybridisation between these species has been documented in NSW. Further evidence

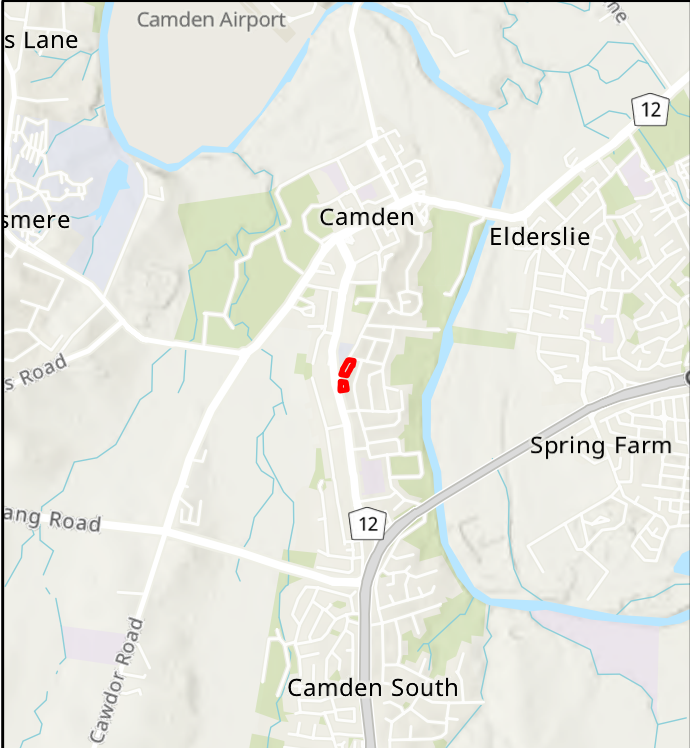


Type	Requirements	Responses
		supporting this tree as a planted specimen is in Section 4.4. All trees within the subject site were identified as either exotic or planted native species in a landscaped setting. The spacing, structure, and species composition of the vegetation are consistent with ornamental plantings, rather than natural regeneration, and reflect the managed nature of the site, including mown lawns and garden beds. The subject site is mapped as 'land excluded' on the Native Vegetation Regulatory Map (DCCEEW, 2026c). As a result, the land is not considered 'Category 1 – exempt land' under the <i>Local Land Services Act 2013</i>. Further details are provided in Section 2.1.
	<i>Location map showing the development site in the context of surrounding areas and landscape features. Satellite image of site in context of adjoining sites.</i>	See Figure 1.
	<i>Site map (to scale, ideally as a spatial shapefile).</i>	See Figure 2.
<i>Proposed development</i>	<i>Project description providing enough information to enable an understanding of the nature and scale of the proposed development and any associated activities (including construction etc.).</i>	The project comprises the construction of new residential flat buildings accommodating 95 apartments to be used for affordable housing, communal rooms and basement car parking. The proposed development includes associated works such as excavation, landscaping, infrastructure, and public domain improvements. Further description of the project is provided in Section 2.2 of this report.
	<i>Proposed site plan</i>	See Appendix C.
<i>Impacts on biodiversity values</i>	<i>Complete Table 2 below on Biodiversity Values For each biodiversity value, the proponent must either:</i> <i>explain why the value is not relevant to the proposed development; or,</i> <i>where a biodiversity value may be relevant, provide an explanation of how</i>	See Table 5 below.



Type	Requirements	Responses
	<i>impacts have been avoided and identify the likelihood and extent of any remaining impacts of the proposed development, including impacts prescribed under clause 6.1 of the BC Regulation.</i>	
	A biodiversity value is not relevant to a proposed development if the value is not present on the development site and there is no potential for direct or indirect impacts <i>on the biodiversity value if it occurs offsite.</i>	See Table 5 below.
	<i>Where one or more biodiversity values may be relevant to the proposed development, Table 2 is to be completed by a suitably qualified person with tertiary qualifications in natural sciences including subjects that relate to the observation and description of terrestrial biodiversity and landforms, and at least three years of work experience in environmental assessment including field identification of plant and animal species and habitats. The person does not need to be an accredited person under the BC Act.</i>	See Table 5 below.
	<i>Attach any additional information required where biodiversity values are relevant to the site. E.g., Vegetation Map (indicating plant community types), Ecology Reports, Water Quality data, BioNet Atlas, Directory of Important Wetlands (DIWA), migratory bird flyway information.</i>	Figure 3 presents the biodiversity values recorded during the site inspection. Supporting information for this report is provided in the following appendices: • Appendix A: Flora Species List • Appendix B: Historical Imagery • Appendix C: Site Plans • Appendix D: BMAT Report • Appendix E: BioNet Atlas Search Results





MENANGLE ROAD CAMDEN

LOCATION MAP

FIGURE 1

LEGEND

Subject Site

Watercourse

Plant Community Type

- 3145 Cumberland Bangalay x Blue Gum Riverflat Forest
- 3320 Cumberland Shale Plains Woodland
- 4024 Cumberland Blue Box Riverflat Forest
- 4025 Cumberland Red Gum Riverflat Forest

Image Source: Nearmap (2026) Dated: 16/04/2026
Data Source: Sixmaps Clip & Ship, NSW Spatial Services
NSW State Vegetation Type Map - SVTM, C2.0.M2.2 © State Government of NSW and NSW Department of Climate Change, Energy, the Environment and Water 2020
DISCLAIMER: All information within this document may be based on external sources. SLR Consulting Pty Ltd makes no warranty regarding the data's accuracy or reliability for any purpose.

0 140 280 m

Coordinate System: GDA2020 MGA Zone 56

Scale: 1:7,408 at A3

Project Number: 630.032888.00001

Date Drawn: 22-Apr-2026

Drawn by: MD





FIGURE 2

LEGEND
[Red outline] Subject Site
[Black outline] Cadastre

Image Source: Nearmap (2026) Dated: 16/04/2026
Data Source: Sixmaps Clip & Ship, NSW Spatial Services
DISCLAIMER: All information within this document may be based on external sources. SLR Consulting Pty Ltd makes no warranty regarding the data's accuracy or reliability for any purpose.

0 15 30 m
Coordinate System: GDA2020 MGA Zone 56
Scale: 1:800 at A3
Project Number: 630.032888.00001
Date Drawn: 22-Apr-2026
Drawn by: MD





FIGURE 3

- LEGEND**
- Subject Site
 - Field Survey Tracks
 - Vegetation Community**
 - Planted Native
 - Planted Exotic
 - Exotic Dominant Grassland
 - Habitat Feature**
 - Mud Nest
 - Stick Nest

Image Source: Nearmap (2026) Dated: 16/04/2026
Data Source: Sixmaps Clip & Ship, NSW Spatial Services
DISCLAIMER: All information within this document may be based on external sources. SLR Consulting Pty Ltd makes no warranty regarding the data's accuracy or reliability for any purpose.

0 15 30 m

Coordinate System: GDA2020 MGA Zone 56

Scale: 1:800 at A3

Project Number: 630.032888.00001

Date Drawn: 22-Apr-2026

Drawn by: MD



2.0 Background

2.1 Site Context

The subject site is located at 72 Menangle Road and 82-86 Menangle Road, Camden, NSW. The subject site is approximately 70 km southwest of the Sydney Central Business District (CBD) and approximately 17 km west of the Campbelltown CBD.

The subject site is bounded by Menangle Road to the west, Gilbulla Avenue to the north, and established residential dwellings on surrounding lots. No significant areas of intact native vegetation occur within or nearby the subject site, being located within a highly urbanised environment surrounded by agricultural land (Figure 1).

The subject site to which this BDAR Waiver applies is approximately 0.71 ha in area and is currently zoned as 'SP2 – Infrastructure' under the *Camden Local Environmental Plan 2023*. The SSD application is accompanied by a concurrent rezoning proposal to rezone the subject site to 'R3 - Medium Density Residential Development'.

The subject site is located adjacent to Camden Hospital and is surrounded by previously developed areas that comprise health and low density residential development. Available vegetation mapping (DPE, 2022) does not identify any native vegetation within the subject site or adjoining lots as conforming to a native vegetation community. The surrounding landscape lacks significant areas of native vegetation and is highly modified, with existing vegetation limited to planted street trees and residential garden plantings.

2.2 The Proposed Development

The SSDA seeks consent for the following:

- Site preparation works including excavation;
- Construction of two residential flat buildings containing 95 dwelling for the purpose of social and affordable housing;
- Construction of one level of basement parking for each residential flat building;
- Associated landscaping and communal open space; and
- Infrastructure servicing.

A detailed description of the project is included in the EIS and the project layout is shown in Appendix C.

2.3 Native Vegetation Definition

For the purpose of the BC Act, native vegetation has the same definition as per the *Local Land Services Act 2013* (LLS Act) and counts towards the native vegetation clearing threshold trigger for the Biodiversity Offset Scheme (BOS) as defined in the BAM. Native vegetation has the same meaning in Section 1.6 of the BC Act and Section 60B of the LLS Act, and is as follows:

1. *For the purposes of this Part, native vegetation means any of the following types of plants native to New South Wales:*
 - a) *trees (including any sapling or shrub or any scrub),*
 - b) *understorey plants,*
 - c) *groundcover (being any type of herbaceous vegetation),*



- d) *plants occurring in a wetland.*
2. *A plant is native to New South Wales if it was established in New South Wales before European settlement. The regulations may authorise conclusive presumptions to be made of the species of plants native to New South Wales by adopting any relevant classification in an official database of plants that is publicly accessible.*
 3. *For the purposes of this Part, native vegetation extends to a plant that is dead or that is not native to New South Wales if:*
 - a) *the plant is situated on land that is shown on the native vegetation regulatory map as category 2-vulnerable regulated land, and*
 - b) *it would be native vegetation for the purposes of this Part if it were native to New South Wales.*
 4. *For the purposes of this Part, native vegetation does not extend to marine vegetation (being mangroves, seagrasses or any other species of plant that at any time in its life cycle must inhabit water other than fresh water). A declaration under section 14.7 of the Biodiversity Conservation Act 2016 that specified vegetation is or is not marine vegetation also has effect for the purposes of this Part.*

3.0 Methods

3.1 Database Analysis

Database searches within the broader locality (10 km × 10 km) of the subject site were undertaken to identify records of threatened species, populations, and ecological communities. Searches were conducted using the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) BioNet Atlas database (DCCEEW, 2026a), and the Commonwealth DCCEEW Protected Matters Search Tool (PMST) (DCCEEW (Cwlth) 2026).

The BioNet Atlas NSW Wildlife search and PMST search for Matters of National Environmental Significance (MNES) were used to generate records of threatened flora and fauna species and populations listed under the BC Act and *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) within the search area. The number, age, and location of such records were considered to inform the likelihood of species occurring within or in proximity to the subject site.

3.2 Desktop Mapping Review

A desktop analysis was undertaken to identify if any native vegetation communities are mapped within or nearby the subject site. This included review of broad scale mapping prepared for the State Vegetation Type Mapping (SVTM) (DPE, 2022) of the subject site and surrounds (see Figure 1). This mapping maps extant native vegetation communities to Plant Community Types (PCTs).

The Biodiversity Values Map Threshold (BMAT) tool, produced by the NSW Government (DCCEEW, 2026b) was reviewed to determine whether any part the subject site intersects with mapped biodiversity values and whether the proposed clearing will exceed the Biodiversity Offset Scheme (BOS) threshold. In addition, historical aerial imagery sourced from NSW Spatial Services (NSW Spatial Services, 2026) was reviewed to assess historical land use and vegetation extent and to identify any changes over time (see Appendix B).



3.3 Flora Survey

An Associate Botanist and Project Ecologist from SLR undertook a site inspection of the subject site on 11 March 2026. The inspection involved traversing all vegetated areas within the subject site, with records made of flora species present (see Appendix A) and any potential fauna habitat features. Vegetation within the subject site and broader study area was assessed in the context of PCTs known to occur within the locality.

Random meander surveys were conducted throughout all vegetated areas of the subject site (Figure 3), during which flora species encountered were recorded. Field notes and photographs were taken to document vegetation characteristics and habitat features across the subject site.

No floristic plot sampling in accordance with the BAM was undertaken, as no remnant native vegetation conforming to a PCT was recorded within the subject site.

3.4 Fauna Habitat Assessment

A fauna habitat assessment was undertaken concurrently with the flora surveys on 11 March 2026 within the subject site. The assessment involved a detailed inspection of all vegetation, and identification of habitat features with potential to support threatened fauna. This included a detailed inspection of all human-made structures to assess their suitability for use as roosting habitat by microchiropteran bats (microbats). Where features with potential roosting suitability were identified, further inspection was undertaken using a hand-held torch to determine whether roosting microbats were present. All habitat features were assessed from ground level, photographed, and their locations recorded using a hand-held GPS unit.

Weather conditions on the day of the site inspection are provided in Table 2 below.

Table 2: Weather Conditions

Field Survey Dates	Temperature	Rainfall (mm)
11/03/2026	16.2-33.2	0.0

Sources: Bureau of Meteorology, weather station no. 068192 Camden NSW 2026 (Bureau of Meteorology, 2026).



4.0 Key Findings

4.1 Summary

The subject site is predominantly isolated trees and cultivated landscape plantings dominated by exotic species and planted non-local native vegetation. There is no evidence of remnant native vegetation conforming to a PCT within the subject site.

4.2 Desktop Mapping Review

The desktop review of the SVTM (DPE 2022) indicates that there are no remnant native vegetation communities consistent with mapped PCT's within the subject site. While a range of native vegetation communities occur within the broader locality (see Figure 1), all vegetation within the subject site and its immediate surrounds is mapped as "Not classified".

Review of the Biodiversity Values Map confirms the subject site and surrounds does not contain any mapped biodiversity values.

Analysis of historical aerial imagery obtained from NSW Spatial Services (2026) indicates that the subject site and surrounding area have been extensively cleared for agricultural use since at least 1947 (see Appendix B). Any existing vegetation is likely to comprise of post-clearing plantings associated with the historical development of the subject site.

4.3 Vegetation of the Subject Site

The SVTM identifies no native vegetation communities (i.e. PCTs) within or nearby the subject site (see Figure 1). Ground-truthing by SLR Ecologists refined the existing vegetation mapping and identified that Planted Native Vegetation is present, as well as Planted Exotic Vegetation and Exotic Dominated Grassland (see Figure 3).

Vegetation communities mapped within the subject site and study area are provided in Table 3 below. None of the vegetation mapped within this subject site conforms to a naturally occurring PCT or TEC listed under the BC Act and EPBC Act. The distribution of the vegetation communities within the subject site are shown in Figure 3, and a description of these vegetation communities are provided below. A full list of flora species found within the subject site during the site inspection is provided in Appendix A.

Table 3 Extent of Vegetation Communities within the Subject Site

Vegetation Community	The Subject Site (ha)
Planted Native Vegetation	0.08
Planted Exotic Vegetation	0.13
Exotic Dominated Grassland	0.23
Cleared Land	0.27
Total	0.71

4.4 Planted Native Vegetation

- Vegetation Formation: Not Applicable
- Statewide Vegetation Class: Not Applicable
- NSW Plant Community Type: Does not conform to a defined PCT



The vegetation community Planted Native Vegetation was mapped within the subject site as there is no remnant native vegetation species associated with any local native vegetation communities. There are eight trees and numerous shrubs species planted within the subject site that are considered native in NSW, yet non-local to the area. These trees and shrubs have been presented in Table 4 below.

Two native tree species recorded within the subject site, Tree 64 (T64) *Brachychiton populneus* (Kurrajong) and Tree 65 (T65) *Melia azedarach* (White Cedar), are known to occur on the Cumberland Plain, although both are commonly planted across NSW. Neither species is listed as characteristic of the Cumberland Plain Woodland (CPW) TEC in the Final Determination (DCCEEW, 2009). The provenance of these trees (i.e. planted versus naturally regenerated) cannot be conclusively determined. However, the trees are isolated within a highly modified site and lack connectivity to mapped vegetation corridors. Historical clearing is evident (see Appendix B), with trees absent from aerial imagery between 1947 to 1961 with the first established vegetation appearing in 1978 imagery (NSW Spatial Services, 2026), indicating that they do not form part of a native vegetation community.

While the Tree Retention Value Plan (Arterra, 2025). identifies Tree 11 (T11) as *Corymbia maculata* (Spotted Gum), observations made during the site inspection suggest the tree is likely a planted hybrid species occurring within a landscaped garden bed among exotic plant species. Potential hybridisation with *Corymbia citriodora* (Lemon-scented Gum) is indicated by the presence of lemon-scented foliage on a fallen branch beneath the tree, a characteristic not consistent with *C. maculata* (Euclid, 2020). Additional evidence includes fruit beneath the tree comprising a mix of typical *C. maculata* capsules and urn- to barrel-shaped capsules consistent with *C. citriodora*, a species native to Australia but not native to the locality of the subject site (National Herbarium of Australia, 2026). On this basis, T11 is considered likely to represent a planted hybrid of *C. maculata* x *C. citriodora*.

The vegetation integrity (VI) within the subject site is very low due to the low cover of native canopy species, and absence of cover or diversity of shrub and ground layers. The highly managed nature of the subject site has prevented any significant accumulation of leaf litter and coarse woody debris, including fallen logs. Two trees within the subject site (T25 & T53) exceed the large tree benchmark size (>50 DBH) under the BAM (DCCEEW, 2025a). Neither tree was reported to have significant habitat value due to the absence of hollows and/or nests. Regardless, these trees are to be retained as per the Tree Retention Value Plan (Arterra, 2025). Photos 1 and 2 show examples of the Planted Native Vegetation present within the subject site.

Table 4 Native Trees and Shrubs within the Subject Site

Tree No.	Scientific Name	Common Name	Relevant to local PCT	Notes
T1	<i>Podocarpus elatus</i>	Plum Pine	No	Planted – coastal rainforest species.
T5	<i>Podocarpus elatus</i>	Plum Pine	No	As above.
T11	<i>Corymbia maculata</i> x <i>citriodora</i>	Spotted Gum	No	Planted in carpark garden bed.
T25	<i>Eucalyptus melliodora</i>	Yellow Box	No	Large tree likely planted – typical of PCTs west of the ranges.
T42	<i>Sannantha similis</i> *	Heath Myrtle	No	Six individual shrubs – commonly planted as a cultivated landscaping species.



Tree No.	Scientific Name	Common Name	Relevant to local PCT	Notes
T53	<i>Angophora costata</i>	Smooth-Bark Apple	No	Not typical in Cumberland Plain PCTs.
T54	<i>Callistemon viminalis</i> cv	Weeping Bottlebrush	No	Horticultural cultivar.
T64	<i>Brachychiton populeus</i>	Kurrajong	Yes	Not characteristic of CPW in Final Determination.
T65	<i>Melia azerdarach</i>	White Cedar	Yes	Not characteristic of CPW in Final Determination.

* Indicates shrub species (all other species listed above are trees).

Tree numbers are consistent with the Tree Retention Value Plan (Arterra, 2025).

Photo 1: Car park landscaped planting bed with mixed exotic and native trees



Photo 2: Isolated Kurrajong tree within a modified landscape



4.5 Planted Exotic Vegetation

- Vegetation Formation: Not Applicable
- Statewide Vegetation Class: Not Applicable
- NSW Plant Community Type: Does not conform to a defined PCT

Planted Exotic Vegetation occurs extensively throughout the subject site, primarily as planted ornamental trees and shrubs within garden beds, along lawn edges, and in formal hedging. The site inspection confirmed the presence of species listed in the Tree Retention Value Plan (Arterra, 2025). The canopy is dominated by a range of introduced tree species including *Cupressus* spp. (Cypress), *Ulmus* spp. (Elms), *Fraxinus* spp. (Ashes) and *Jacaranda mimosifolia* (Jacaranda). Broad-leaved privet (*Ligustrum lucidum*) is a common tree species within the subject site, particularly at 84 and 86 Menangle Road, where it has been planted as hedging and allowed to develop into mature trees (see Photo 3), despite its classification as an environmental weed.



Photo 3: Exotic broad-leaved privet tree and *Paspalum*-dominated lawn at No. 84



4.6 Exotic Dominated Grassland

- Vegetation Formation: Not Applicable
- Statewide Vegetation Class: Not Applicable
- NSW Plant Community Type: Does not conform to a defined PCT

Exotic Dominated Grassland is the vegetation type with the greatest cover within the subject site and occurs as lawns maintained through mowing. It is dominated by introduced grasses that include *Cenchrus clandestinus* (Kikuyu Grass), *Cynodon dactylon* (Common Couch), and *Stenotaphrum secundatum* (Buffalo Grass).

Common exotic lawn weeds occur within 84 and 86 Menangle Road (see Photo 3 - 5), with the most dominant species being *Paspalum dilatatum* (Paspalum), *Plantago lanceolata* (narrow-leaf plantain), and *Paronychia brasiliensis* (Brazilian Whitlow). A small number of native grasses and herbs occur infrequently within the lawn and display a scattered distribution, often occurring in shaded areas beneath tree canopies. Native ground cover species recorded within the subject site include *Microlaena stipoides* var. *stipoides* (Weeping Grass), *Cyperus gracilis* (Slender Flat Sedge), and *Dichondra repens* (Kidney Weed).



Photo 4: Maintained lawn areas to the north of the former nurses' quarters



Photo 5: Exotic green ash tree amongst maintained lawns



4.7 Cleared Land

- Vegetation Formation: Not Applicable
- Statewide Vegetation Class: Not Applicable
- NSW Plant Community Type: Does not conform to a defined PCT

Cleared Land within the subject site consists of concrete footpaths, buildings, and ancillary building features, including steps (Photo 4).

4.8 Fauna Habitat of the Site

The subject site is highly modified and is considered to have poor fauna habitat value, with low suitability for threatened fauna species due to the limited availability of native vegetation habitat features. The few native trees scattered within the subject site may provide opportunistic foraging resources during intermittent flowering or fruiting periods including, plum pine fruit and eucalypt blossoms, particularly for highly mobile species such as flying foxes. No fallen logs, areas of accumulated coarse woody debris, or substantial leaf litter were observed, indicating an absence of suitable habitat for Cumberland Plain Land Snail (*Meridolum corneovirens*). Additionally, no wet or damp areas were identified, indicating that habitat suitability for amphibian species within the subject site is low.

Exotic vegetation has been considered as part of this assessment where it had potential to provide habitat attributes for threatened species. One exotic tree proposed for removal, identified as Tree 10 (T10) *Ulmus glabra* 'Lutescens' (Golden Elm) in the Tree Retention Value Plan (Arterra, 2025), was assessed for its potential suitability as microbat habitat due to the presence of several small trunk openings (see Photo 6). The site inspection confirmed that the majority of openings are limited in size and depth, and do not meet the structural characteristics required for microbat roosting habitat. Openings with greater depth were inspected using a torch however, no evidence of current or historical fauna use was observed (e.g. scat, urine staining, scratching). Based on these findings, T10 is considered unlikely to provide suitable roosting habitat for microbat species however mitigation measures are recommended in Section 7.0 to minimise any potential risk to fauna during vegetation removal.

During the site inspection, a stick nest was observed within an exotic tree, identified as Tree 2 (T2) *Fraxinus pennsylvanica* (Green Ash) in the Tree Retention Value Plan (Arterra, 2025). As this tree is not proposed for removal, the nest is not expected to be impacted by the project. A mud nest was also identified under a dwelling at 82 Menangle Road. The locations of the nests are shown in Figure 3, and no evidence of active or recent use of either nest was observed during the survey.

A single occupied dwelling is located within Lot 1 of DP 24039 of the subject site, while the remaining buildings within the subject site are not currently in use, and doors and windows have been boarded shut. Several gaps around the boarding and other building defects were observed, which may allow fauna such as microbats or birds to access these structures (refer to Photo 8). A deceased fledgling was observed within a gap on the northern side of the former nurses' quarters (see Photo 7).

All buildings were externally inspected using a torch to assess potential fauna habitat, and accessible subfloor areas beneath the dwellings on Lots 1–3 of DP 24039 were inspected where safe to do so. Internal inspections were not undertaken due to safety constraints. Subfloor areas were open in structure and lacked enclosed features, hollows, or crevices suitable for microbat roosting. A small, inactive mud nest was recorded beneath the dwelling on Lot 1 of DP 24039. Openings into the buildings were observed (e.g. failing timber



boarding to windows installed post-closure and a large fan cavity opening) however, most appear to be recent in origin and associated with building closure and progressive structural deterioration, rather than long-term or established fauna use. No evidence of active use was observed at the time of survey, as indicated by the absence of fauna scats, staining, scratching, or other signs of occupation. Therefore, the buildings are not considered to provide suitable roosting habitat for microbats. Precautionary mitigation measures for demolition and vegetation removal are recommended in Section 7.0.

Photo 6: Exotic golden elm tree assessed for potential fauna habitat

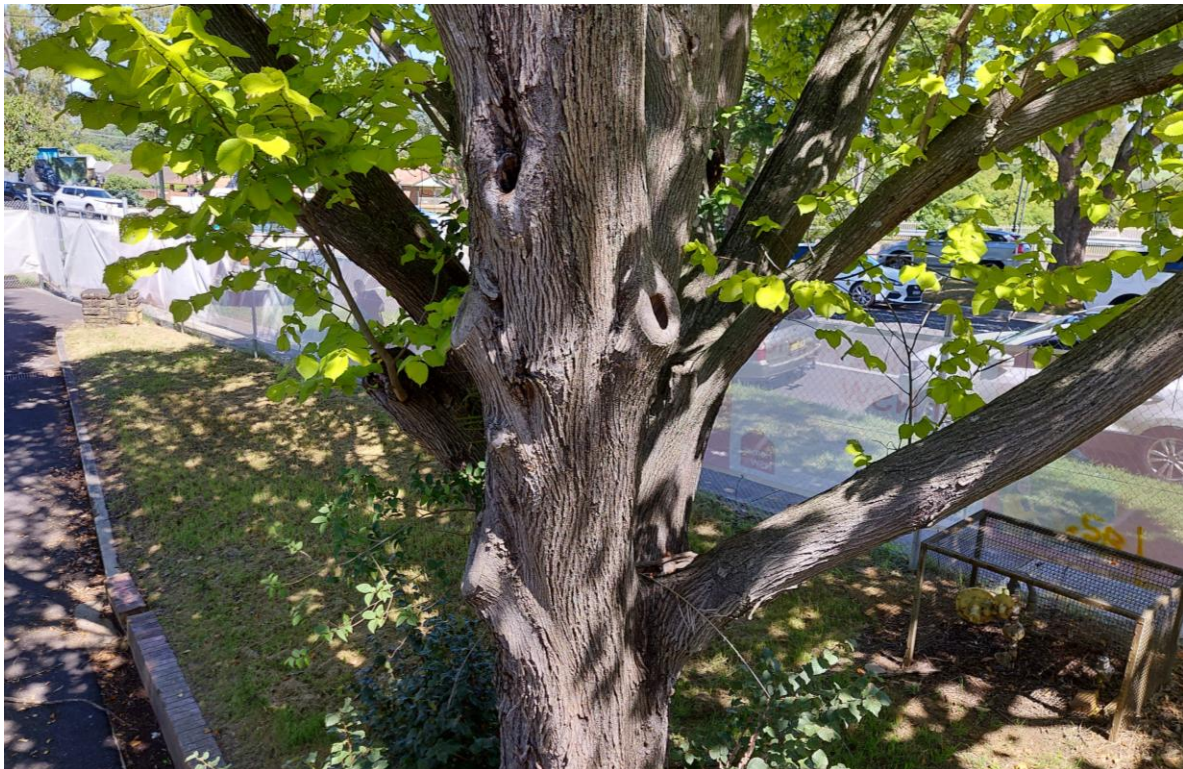
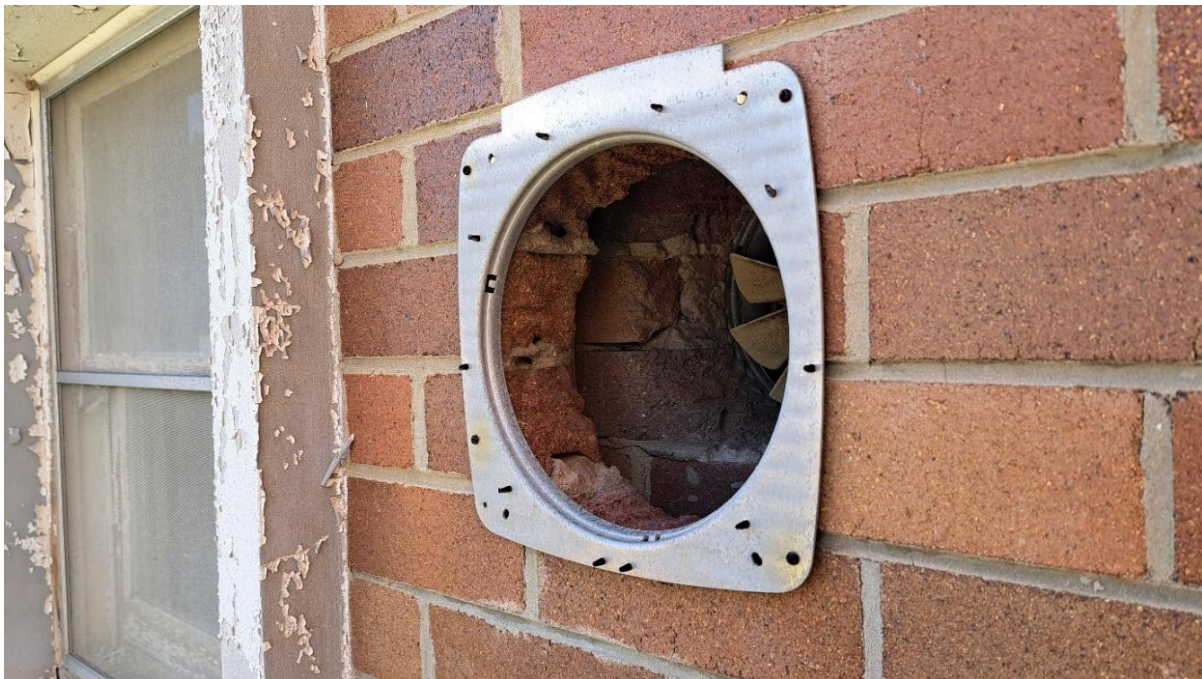


Photo 7: Deceased fledgling in boarded window gap



Photo 8: Fan vent opening on vacant nurses' quarters



5.0 Threatened Ecological Communities and Species

5.1 Threatened Ecological Communities

No TECs occur within the subject site. The sites landscape position, and remnant vegetation in the surrounding locality suggest that Cumberland Plain Woodland Critically Endangered Ecological Community (CEEC) may have been historically present however, no tree species recorded within the subject site are characteristic of this community as listed in the Final Determination (DCCEEW, 2009).

Small patches of native ground cover species characteristic of the Cumberland Plain Woodland CEEC were identified within the subject site however, the overall native ground cover, when assessed at a 20m x 20m plot scale, is well below 50%. The indicative native species recorded include *Microlaena stipoides*, *Cyperus gracilis* and *Dichondra repens*. The low cover and limited diversity of these species across the subject site would result in a very low vegetation integrity score if assessed under the BAM, and do not constitute a derived grassland form of Cumberland Plain Woodland CEEC.

5.2 Threatened Flora

No threatened flora species were observed in the subject site during the site inspection, and none are considered likely to be present due to the lack of a native vegetation community and the long history of disturbance within the subject site.

5.3 Threatened Fauna and Associated Habitat

Planted trees within the subject site may provide opportunistic foraging habitat for highly mobile threatened species such as the Grey-headed Flying Fox (*Pteropus poliocephalus*), which is listed as Vulnerable under both the BC Act and the EPBC Act. This species typically roosts in large camps that are within 20 km of a food source and often feeds on the nectar and pollen of native trees.

The closest roosting camp for the Grey-headed Flying Fox is the Campbelltown Camp (approximately 15 km to the east). As such, the trees within the subject site may provide suitable foraging habitat for this threatened species on an intermitted basis. No roosting camps are present in the subject site and therefore it does not provide breeding or roosting habitat for this species.

No threatened or migratory fauna species have been recorded within the subject site however, a total of 29 species, including the Grey-headed Flying Fox, are known to occur within the broader locality (DCCEEW, 2026a). The full list of threatened and migratory species is provided in Appendix E.

An assessment of the likelihood of occurrence of threatened fauna within the subject site indicates that the following species have potential to utilise the site for foraging purposes only:

- Eastern False Pipistrelle (*Flasistrellus tasmaniensis*) – listed as Vulnerable under the BC Act.
- Little Bent-winged Bat (*Miniopterus australis*) – listed as Vulnerable under the BC Act.
- Large Bent-winged Bat (*Miniopterus orianae oceanensis*) – listed as Vulnerable under the BC Act.



- Grey-headed Flying Fox (*Pteropus poliocephalus*) – listed as Vulnerable under the BC Act and EPBC Act.
- Yellow-bellied Sheath tail-bat (*Saccolaimus flaviventris*) – listed as Vulnerable under the BC Act.
- Eastern Coastal Free-tailed Bat (*Micronomus norfolkensis*) – listed as Vulnerable under the BC Act and EPBC Act.
- Greater Broad-nosed Bat (*Scoteanax rueppellii*) – listed as Vulnerable under the BC Act and EPBC Act.
- Powerful Owl (*Ninox strenua*) - listed as Vulnerable under the BC Act.

All threatened fauna species listed above are highly mobile and may utilise the subject site intermittently as part of a broader foraging range. No breeding habitat is present within the subject site for these species, therefore, it is unlikely that the proposed development would result in significant impacts.

6.0 Impact Assessment

6.1 Impacts to Vegetation and Habitat

The project currently proposes the retention of some vegetation within the subject site; however, for the purposes of this assessment we have assumed a ‘worst-case’ scenario in the event that all vegetation would be removed. As such, the project has the potential to result in the removal of 0.08 ha of Planted Native Vegetation, 0.13 ha of Planted Exotic Vegetation, 0.23 ha Exotic Dominated Grassland and 0.27 ha of Cleared Land. None of the vegetation within the subject site conforms to a PCT, or TEC listed under the BC Act and/or EPBC Act.

The proposed removal of vegetation and associated habitat, including human-made structures, is unlikely to result in a significant impact on any threatened species or ecological communities listed under the BC Act or EPBC Act. All vegetation proposed to be removed comprises of planted native and exotic vegetation, considered to be of very low conservation significance.

While the habitat to be removed may provide a very limited area of foraging habitat for highly mobile threatened species, this habitat is not considered important to the long-term survival of any threatened species. No suitable breeding or roosting habitat is present within the subject site, and any use of the site would be occasional at most, within the context of a much broader foraging range.

Mitigation measures are recommended in Section 7.0 to minimise potential impacts on the biodiversity values within the subject site and surrounding area.



6.2 Biodiversity Values Assessment

The BC Act and BC Regulation list a suite of biodiversity values that are relevant to assessments that must take place under the BC Act. To demonstrate that the project will not impact upon biodiversity, Table 5 systematically comments upon the relevance of each value as they are presented in Table 2 of “*How to apply for a biodiversity assessment report waiver for a Major Project Application*” (DPIE 2019).

Table 5 Impacts of the Proposed Development on Biodiversity Values

Biodiversity Value	Assessment within the site
Vegetation abundance – 1.4(b) BC Regulation <i>Meaning: Occurrence and abundance of vegetation at a particular site.</i>	A site inspection confirmed that vegetation across the subject site (72 and 82-86 Menangle Road, Camden) is limited to exotic dominated grassland and cultivated landscape plantings both native and exotic species. The total area of each vegetation community within the subject site is shown in Table 3 and reproduced below: - Planted Native Vegetation: 0.08 ha - Planted Exotic Vegetation: 0.13 ha - Exotic Dominated Grassland: 0.23 ha - Cleared Land: 0.27 ha The subject site does not support any native vegetation communities constituting to a locally occurring PCT or TEC that would be affected by the proposed development.
Vegetation integrity –1.5(2)(a) BC Act <i>Meaning: Degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near natural state.</i>	Based upon analysis of historic aerial photography (Appendix B), and the context of the subject site being in an urban area, it is not considered that remnant native vegetation occurs within the subject site. Results of floristic surveys concluded that the existing vegetation within the subject site are predominantly exotic species amongst scattered planted native vegetation within a landscaped context. The native vegetation within the subject site includes two commonly planted local tree species including a Kurrajong (<i>Brachychiton populneus</i>) and White Cedar (<i>Melia azedarach</i>). There are negligible structural and functional attributes within the subject site such as litter or fallen timber. Two large native trees (>50cm diameter) will be retained as per the Tree Retention Value Plan (Arterra 2025).



Biodiversity Value	Assessment within the site
Habitat suitability –1.5(2)(b) BC Act Act <i>Meaning: Degree to which the habitat needs of threatened species are present at a particular site.</i>	As discussed above, the subject site has little potential to provide habitat for threatened species other than several tree canopies which can provide habitat for highly mobile, aerial species. These aerial species are highly mobile and may occasionally and opportunistically utilise the limited foraging resources of the subject site as part of a larger range however, breeding and roosting habitat availability is limited, as discussed in Section 5.3.
Threatened species abundance –1.4(a) BC Regulation <i>Meaning: Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site.</i>	Flora No threatened flora species were observed in the subject site during the site inspection, and none are considered likely to be present due to the longstanding disturbance of the subject site. Threatened Ecological Communities No vegetation conforming to a TEC is present in the subject site. Fauna Mobile threatened fauna species have the potential to forage over the subject site on occasion as part of a much broader foraging range. Species with potential to utilise the subject site on occasion as part of a much broader foraging range include the Grey-headed Flying Fox, microbats and Powerful Owl listed in Section 5.3 of this report. The desktop assessment identified that no threatened species have been previously recorded within the subject site based on BioNet Atlas Threatened Species Data (DCCEEW 2026a). No suitable roosting/ breeding habitat for threatened species was observed during the site inspection.
Habitat connectivity –1.4(c) BC Regulation <i>Meaning: Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range.</i>	The subject site contributes very little to habitat connectivity as it is largely cleared and has limited native woody vegetation. The subject site is within a previously developed area and is not connected or nearby to any areas of extensive habitat. The small patches of vegetation within the subject site may function as stepping-stone habitat for highly mobile fauna, providing a degree of habitat connectivity across the highly urbanised area; however, the removal of habitat will not restrict the ability of any species to move across their range. The Nepean River is the most significant corridor in the locality, being approximately 600m to the east of the subject site although it will be unaffected by the project.



Biodiversity Value	Assessment within the site
Threatened species movement: 1.4(d) BC Regulation <i>Meaning: Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle.</i>	As above, the subject site does not contribute to the movement of threatened species other than providing some very minor stepping stone connectivity for highly mobile, aerial species. Impacts within the subject site would not be expected to have any significant impact on such species by disrupting their lifecycle.
Flight path integrity 1.4(e) BC Regulation <i>Meaning: Degree to which the flight paths of protected animals over a particular site are free from interference.</i>	The subject site has low value as a flight path. It is not located immediately between areas of habitat. The proposed building height do not represent a barrier to higher flying migratory species.
Water sustainability 1.4(f) BC Regulation <i>Meaning: Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.</i>	Approximately 50% of the subject site is already covered in impervious surface and the proposal is considered unlikely to significantly impact hydrological processes that would sustain any threatened species and/or threatened ecological communities. The subject site is not proximal to waterways or terrestrial groundwater dependant ecosystems (BOM, 2017). The project is expected to meet relevant stormwater requirements for the suburb, and construction impacts are mitigated through standards measures.

7.0 Mitigation Measures

The following measures are recommended to be implemented within the subject site to minimise the potential impacts on native fauna and associated habitat:

- In accordance with the Tree Retention Value Plan (Arterra 2025), two non-local native trees (T25 and T53) are rated as having high retention value. Where feasible, the trees should be retained to maintain incidental foraging resources for native fauna within the highly modified landscape.
- All broad-leaved privet (*Ligustrum lucidum*) within the subject site are recommended for removal in accordance with NSW WeedWise guidelines, including cut-stump or mechanical removal methods with appropriate herbicide treatment to prevent regrowth (NSW DPI, 2025).
- Follow-up monitoring and control is to be undertaken as required to manage broad-leaved privet regeneration and prevent further weed spread, in accordance with the general biosecurity duty under the NSW *Biosecurity Act 2015* (NSW DPI, 2025).
- An unexpected fauna finds procedure should be implemented during vegetation clearing and demolition works to manage the unlikely event that fauna is encountered within buildings, vegetation, or other built features.
- Prior to vegetation clearing and structure demolition, a pre-clearance inspection should be undertaken by a suitably qualified ecologist to confirm the absence of active fauna use.



8.0 Conclusion

A BDAR Waiver has been sought in support of the proposed redevelopment of 72 and 82-26 Menangle Road, Camden, NSW. The subject site is located within a previously developed precinct, with agricultural land occurring within the broader locality. The subject site currently contains a vacant nurses' building, an associated carpark, three residential dwellings, extensive sealed concrete surfaces and ornamental landscape plantings.

The subject site does not intersect any mapped biodiversity values on the Biodiversity Values Map, and the proposed clearing will not exceed the BOS threshold. Historical aerial imagery confirms that the subject site has been previously cleared of original native vegetation and does not support any native PCT's or TEC's.

The project is unlikely to result in a significant impact on biodiversity values as defined under the BC Act and the BC Regulation. The proposal involves the removal of approximately 0.08 ha of Planted Native Vegetation and 0.13 ha of Planted Exotic Vegetation. This vegetation represents a small and marginal area of potential foraging habitat within the broader ranges of highly mobile threatened fauna species such as the Grey-headed Flying Fox, Powerful Owl and microbats. No roosting habitat or important habitat features were identified during the assessment, and the likelihood of adverse impacts to these species or their local populations is therefore considered to be very low.

All remaining impact areas comprise Exotic Dominated Grassland or Cleared Land. Given the limited habitat value of the subject site, no impacts to threatened fauna species are expected to occur. The subject site does not support the movement, lifecycle requirements, or habitat connectivity of threatened species, nor does it contribute to water sustainability, flight path integrity, or ecological connectivity.

The site does not contain habitat features such as hollow-bearing trees or structures likely to support microbat roosting. No evidence of microbat activity (e.g. scats, urine staining, or roosting behaviour) was observed during the site inspection. The potential for the subject site to be used as breeding habitat by microbats is therefore considered low.

A desktop assessment and site inspection confirmed that all vegetation within the subject site has been previously cleared and currently comprises exotic and native species planted for landscaping purposes. No threatened flora species have been recorded within the subject site, and none are considered likely to occur. Two local native species were recorded within the subject site on 86 Menangle Road including a Kurrajong (*Brachychiton populneus*) and White Cedar (*Melia azedarach*). Based on historical aerial imagery (Appendix B), their occurrence within a highly modified environment, and the fact that both species are commonly cultivated across NSW, these trees are not considered to form part of a native PCT or TEC. Vegetation within the subject site also lacks connectivity to mapped native vegetation in the surrounding locality.

Given the absence of mapped biodiversity values, native vegetation, and ecological function within the site, it is concluded that the proposed development meets the eligibility criteria for a BDAR Waiver and the preparation of a BDAR is not required.



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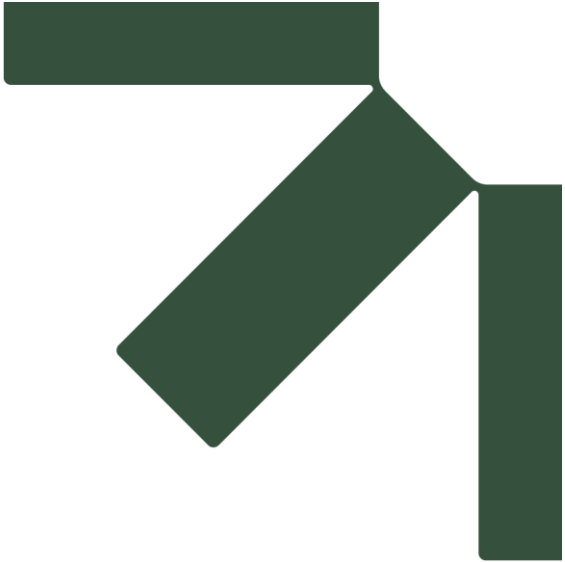


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Appendix A Flora Species List

BDAR Waiver Request

72 and 82-86 Menangle Road, Camden

Homes NSW

SLR Project No.: 630.032888.00001

18 May 2026

Table A 1 Flora Species Recorded within the Subject Site

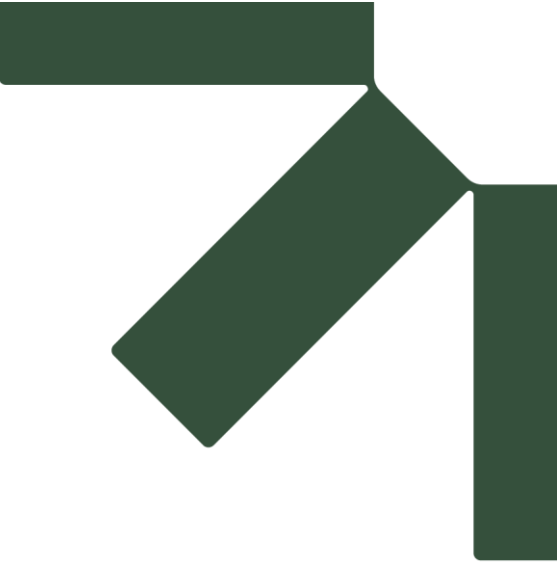
BAM Growth Form	Scientific Name	Common Name	Exotic	HTW
Exotic	<i>Acer negundo</i>	Box Elder	*	HTW - manageable
Tree (TG)	<i>Angophora costata</i>	Smooth-barked Apple		
Tree (TG)	<i>Brachychiton populneus</i>	Kurrajong		
Tree (TG)	<i>Callistemon viminalis</i>	Weeping Bottlebrush		
Exotic	<i>Camellia japonica</i>	Japanese Camellia	*	
Exotic	<i>Cenchrus clandestinus</i>	Kikuyu Grass	*	HTW - not manageable
Exotic	<i>Cordyline australis</i>	Cabbage Tree	*	
Tree (TG)	<i>Corymbia maculata</i> × <i>Corymbia citriodora</i>	Hybrid spotted gum × lemon-scented gum		
Exotic	<i>Cupressocyparis x leylandii</i>	Leyland Cypress	*	
Exotic	<i>Cupressus macrocarpa</i>	Monterey Cypress	*	
Exotic	<i>Cupressus sempervirens</i>	Italian Cypress	*	
Grass & grasslike (GG)	<i>Cynodon dactylon</i>	Common Couch		
Grass & grasslike (GG)	<i>Cyperus gracilis</i>	<i>Slender Flat Sedge</i>		
Forb (FG)	<i>Dichondra repens</i>	Kidney Weed		
Tree (TG)	<i>Eucalyptus melliodora</i>	Yellow Box		
Tree (TG)	<i>Eucalyptus microcorys</i>	Tallow Wood		
Exotic	<i>Fraxinus griffithii</i>	Griffith's Ash	*	
Exotic	<i>Fraxinus pennsylvanica</i>	Green Ash	*	
Tree (TG)	<i>Glochidion ferdinandi</i>	Cheese Tree		
Tree (TG)	<i>Grevillea robusta</i>	Silky Oak		
Exotic	<i>Jacaranda mimosifolia</i>	Jacaranda	*	
Exotic	<i>Lagerstroemia indica</i>	Crepe Myrtle	*	
Exotic	<i>Ligustrum lucidum</i>	Large-leaved Privet	*	HTW - not manageable
Tree (TG)	<i>Lophostemon confertus</i>	Brush Box		
Tree (TG)	<i>Melia azedarach</i>	White Cedar		
Exotic	<i>Paronychia brasiliiana</i>	Brazilian Whitlow	*	
Grass & grasslike (GG)	<i>Microlaena stipoides</i> var. <i>stipoides</i>	Tussock Grass		
Exotic	<i>Paspalum dilatatum</i>	Paspalum	*	HTW - not manageable



BAM Growth Form	Scientific Name	Common Name	Exotic	HTW
Exotic	<i>Phoenix canariensis</i>	Canary Island Date Palm	*	HTW - manageable
Exotic	<i>Plantago lanceolata</i>	Narrow-leaf plantain	*	
Exotic	<i>Platycladus orientalis</i>	Chinese Arborvitae	*	
Tree (TG)	<i>Podocarpus elatus</i>	Plum Pine		
Exotic	<i>Pyrus calleryana</i>	Callery Pear	*	
Exotic	<i>Salix matsudana</i> 'Tortuosa'	Tortured Willow	*	HTW - manageable
Shrub (SG)	<i>Sannantha pluriflora</i>	Twiggy Heath Myrtle		
Exotic	<i>Stenotaphrum secundatum</i>	Buffalo Grass		HTW - manageable
Exotic	<i>Triadica sebifera</i>	Chinese Tallow Tree	*	HTW - manageable
Exotic	<i>Ulmus glabra</i> 'Lutescens'	Golden Elm	*	
Exotic	<i>Ulmus x hollandica</i>	Dutch Elm	*	
Exotic	<i>Washingtonia robusta</i>	Washington Palm	*	

*High Threat Weeds (HTW) are plants not native to Australia that if not controlled will invade and outcompete native species. Manageable HTW are weeds that can be controlled while not management HTW are not considered to be manageable or require substantial controls.





Appendix B Historical Imagery

BDAR Waiver Request

72 and 82-86 Menangle Road, Camden

Homes NSW

SLR Project No.: 630.032888.00001

18 May 2026

Figure C 1: Extract of 1947 Historic Aerial Imagery, Showing Approximate Boundary of the Subject Site in Red (Spatial Services 2026)



Figure C 2: Extract of 1956 Historic Aerial Imagery, Showing Approximate Boundary of the Subject Site in Red (Spatial Services 2026)



Figure C 3: Extract of 1961 Historic Aerial Imagery, Showing Approximate Boundary of the Subject Site in Red (Spatial Services 2026)

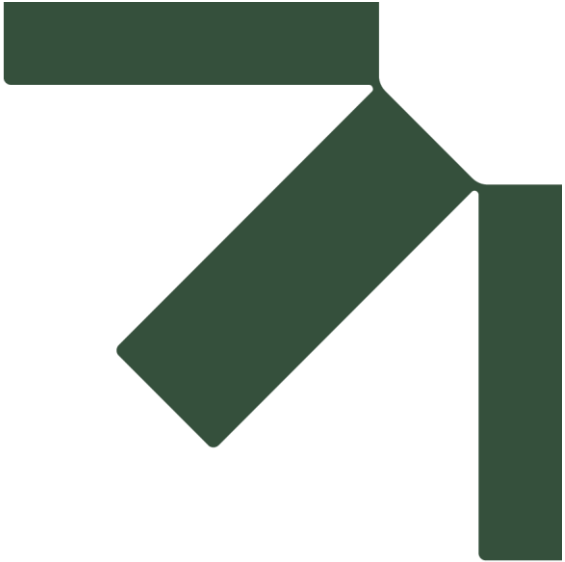


Figure C 4: Extract of 1978 Historic Aerial Imagery, Showing Approximate Boundary of the Subject Site in Red (Spatial Services 2026)



Figure C 5: Extract of 2005 Historic Aerial Imagery, Showing Approximate Boundary of the Subject Site in Red (Spatial Services 2026)





Appendix C Site Plans

BDAR Waiver Request

72 and 82-86 Menangle Road, Camden

Homes NSW

SLR Project No.: 630.032888.00001

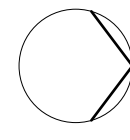
18 May 2026



Rev	Date	By	Chk	Description
P08	5/05/2026	DF	DF	For Coordination
P09	6/05/2026	MR	DF	For Waste Coordination
P10	8/05/2026	MR	DF	For Services Coordination
P11	15/05/2026	MR	DF	For BDAR Waiver

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- All works to be in accordance with authority & statutory approvals.
- Refer to site survey for all information relating to existing site conditions.
- All Boundary information to be confirmed by registered surveyor before commencing works on site.
- Refer to Arborist Report and Landscape Documentation for all information relating to trees and their retention/removal, and all landscape works.
- Drawings to be read in conjunction with all Specifications and Schedules; all specialist consultant documentation (BASIX, NABERS, Section U Certificates).
- Minor changes to building form & configuration may be required after Development Consent.
- Do not scale from drawing; figured dimensions only to be used.
- Building Contractor to verify all dimensions before commencing work.



Auckland
Brisbane
Ho Chi Minh
Melbourne
Perth
Sydney

dko.com.au
info@dko.com.au
T +61 2 6346 4900

DKO

Project Name
Project Number
Project Address

70-78 & 82-86 Menangle Rd, Camden
14127
70-78 & 82-86 Menangle Rd
Camden NSW 2570

Country

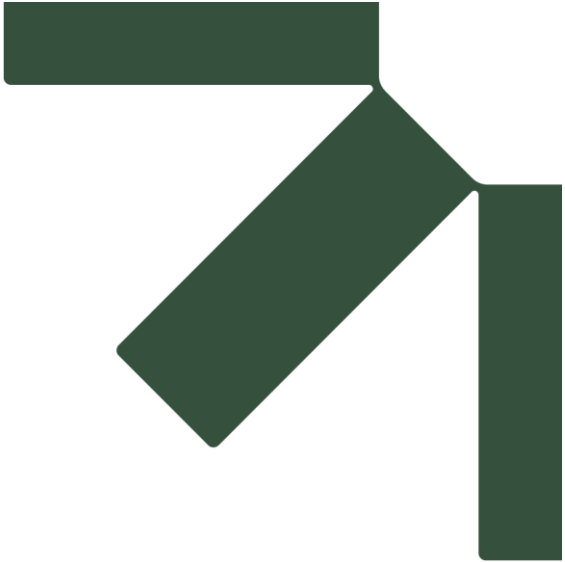
Gandangara

PRELIMINARY

Drawing Name
Overall - Ground Floor

Drawing Scale
Drawing No.
DA202

1:300 @ A1
Revision
P11



Appendix D BMAT Report

BDAR Waiver Request

72 and 82-86 Menangle Road, Camden

Homes NSW

SLR Project No.: 630.032888.00001

18 May 2026

Biodiversity Values Map and Threshold Report

This report is generated using the Biodiversity Values Map and Threshold (BMAT) tool. The BMAT tool is used by proponents to supply evidence to your local council to determine whether or not a Biodiversity Development Assessment Report (BDAR) is required under [the Biodiversity Conservation Regulation 2017 \(Cl. 7.2 & 7.3\)](#).

The report provides results for the proposed development footprint area identified by the user and displayed within the blue boundary on the map.

There are two pathways for determining whether a BDAR is required for the proposed development:

1. Is there Biodiversity Values Mapping?
2. Is the 'clearing of native vegetation area threshold' exceeded?

Biodiversity Values Map and Threshold Report		
Date of Report Generation		09/02/2026 12:33 PM
1. Biodiversity Values (BV) Map - Results Summary (Biodiversity Conservation Regulation Section 7.3)		
1.1	Does the development Footprint intersect with BV mapping?	no
1.2	Was <u>ALL</u> BV Mapping within the development footprinted added in the last 90 days? (dark purple mapping only, no light purple mapping present)	no
1.3	Date of expiry of dark purple 90 day mapping	N/A
1.4	Is the Biodiversity Values Map threshold exceeded?	no
2. Area Clearing Threshold - Results Summary (Biodiversity Conservation Regulation Section 7.2)		
2.1	Size of the development or clearing footprint	7,114.1 sqm
2.2	Native Vegetation Area Clearing Estimate (NVACE) (within development/clearing footprint)	3,211.3 sqm
2.3	Method for determining Minimum Lot Size	Lot size
2.4	Minimum Lot Size (10,000sqm = 1ha)	583 sqm
2.5	Area Clearing Threshold (10,000sqm = 1ha)	2,500 sqm
2.6	Does the estimate exceed the Area Clearing Threshold? (NVACE results are an estimate and can be reviewed using the Guidance)	yes
REPORT RESULT: Is the Biodiversity Offset Scheme (BOS) Threshold exceeded for the proposed development footprint area?		yes
(Your local council will determine if a BDAR is required)		

What do I do with this report?

- If the result above indicates the BOS Threshold has been exceeded, your local council **may require** a Biodiversity Development Assessment Report with your development application. Seek further advice from Council. An accredited assessor can apply the Biodiversity Assessment Method and prepare a BDAR for you. For a list of accredited assessors go to: <https://customer.lmbc.nsw.gov.au/assessment/AccreditedAssessor>.
- If the result above indicates the BOS Threshold has not been exceeded, you may not require a Biodiversity Development Assessment Report. This BMAT report can be provided to Council to support your development application. Council can advise how the area clearing threshold results should be considered. Council will review these results and make a determination if a BDAR is required. Council may ask you to review the area clearing threshold results. You may also be required to assess whether the development is “likely to significantly affect threatened species” as determined under the test in Section 7.3 of the *Biodiversity Conservation Act 2016*.
- If a BDAR is not required by Council, you may still require a permit to clear vegetation from your local council.
- If **all** Biodiversity Values mapping within your development footprint was less than 90 days old, i.e. areas are displayed as dark purple on the BV map, a BDAR may not be required if your Development Application is submitted within that 90 day period. Any BV mapping less than 90 days old on this report will expire on the date provided in Line item 1.3 above.

For more detailed advice about actions required, refer to the **Interpreting the evaluation report** section of the [Biodiversity Values Map Threshold Tool User Guide](#) .

Review Options:

- If you believe the Biodiversity Values mapping is incorrect please refer to our [BV Map Review webpage](#) for further information.
- If you or Council disagree with the area clearing threshold estimate results from the NVACE in Line Item 2.6 above (i.e. area of Native Vegetation within the Development footprint proposed to be cleared), review the results using the [Guide for reviewing area clearing threshold results from the BMAT Tool](#).

Acknowledgement

I, as the applicant for this development, submit that I have correctly depicted the area that will be impacted or likely to be impacted as a result of the proposed development.

Signature: _____

(Typing your name in the signature field will be considered as your signature for the purposes of this form)

Date: _____

09/02/2026 12:33 PM

Biodiversity Values Map and Threshold Tool

The Biodiversity Values (BV) Map and Threshold Tool identifies land with high biodiversity value, particularly sensitive to impacts from development and clearing.

The BV map forms part of the Biodiversity Offsets Scheme threshold, which is one of the factors for determining whether the Scheme applies to a clearing or development proposal. You have used the Threshold Tool in the map viewer to generate this BV Threshold Report for your nominated area. This report calculates results for your proposed development footprint and indicates whether Council may require you to engage an accredited assessor to prepare a Biodiversity Development Assessment Report (BDAR) for your development.

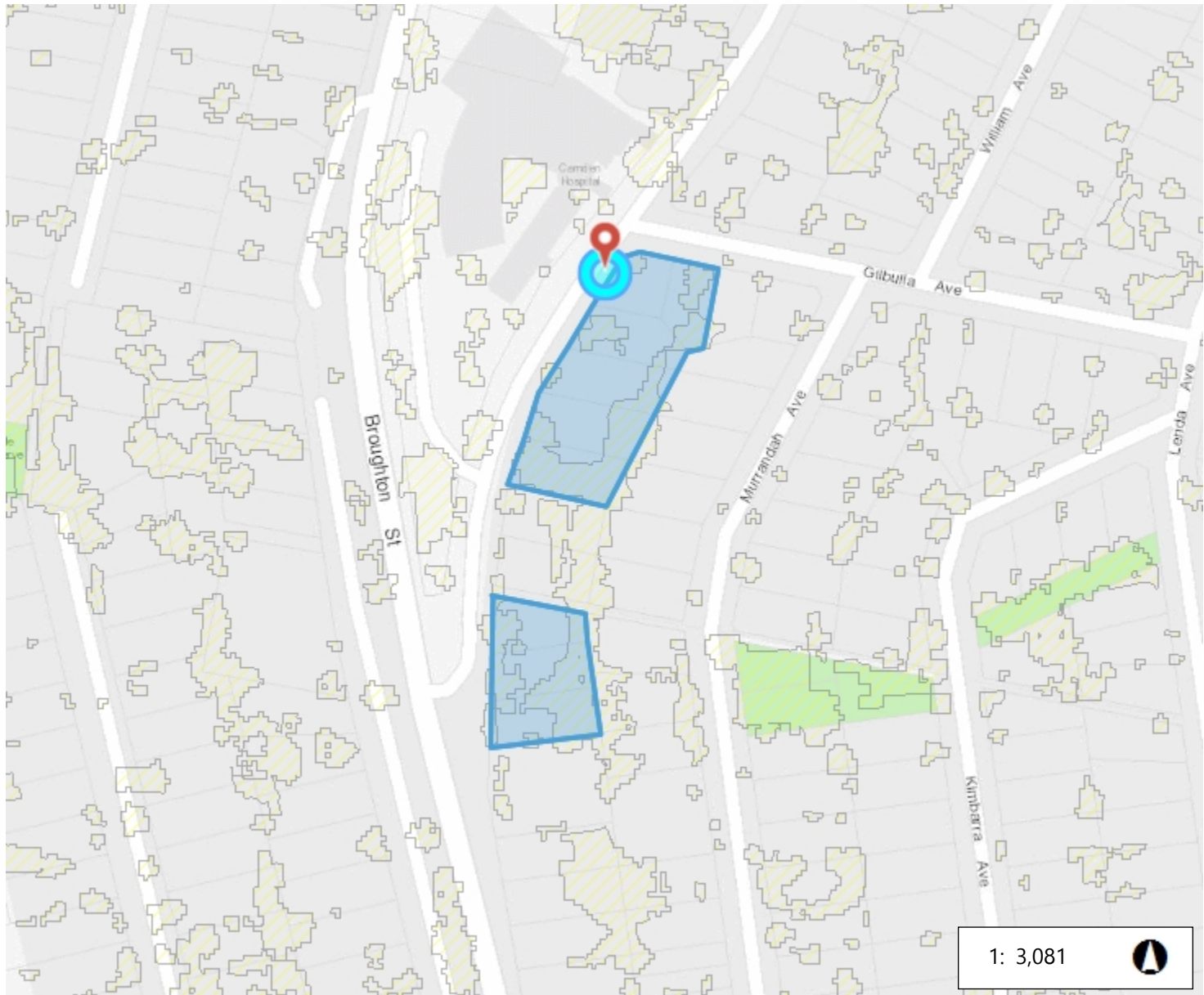
This report may be used as evidence for development applications submitted to councils. You may also use this report when considering native vegetation clearing under the State Environmental Planning Policy (Biodiversity and Conservation) 2021 - Chapter 2 vegetation in non-rural areas.

What's new? For more information about the latest updates to the Biodiversity Values Map and Threshold Tool go to the updates section on the [Biodiversity Values Map webpage](#).

Map Review: Landholders can request a review of the BV Map where they consider there is an error in the mapping on their property. For more information about the map review process and an application form for a review go to the [Biodiversity Values Map Review webpage](#).

If you need help using this map tool see our [Biodiversity Values Map and Threshold Tool User Guide](#) or contact the Map Review Team at map.review@environment.nsw.gov.au or on 1800 001 490.

Biodiversity Values Map



156.5 0 78.25 156.5 Metres

WGS_1984_Web_Mercator_Auxiliary_Sphere

Legend

-  Biodiversity Values that have been mapped for more than 90 days
-  Biodiversity Values added within last 90 days
-  Native Vegetation Area Clearing Estimate (NVACE)
-  Development area selected by proponent

09/02/2026 12:33 PM

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

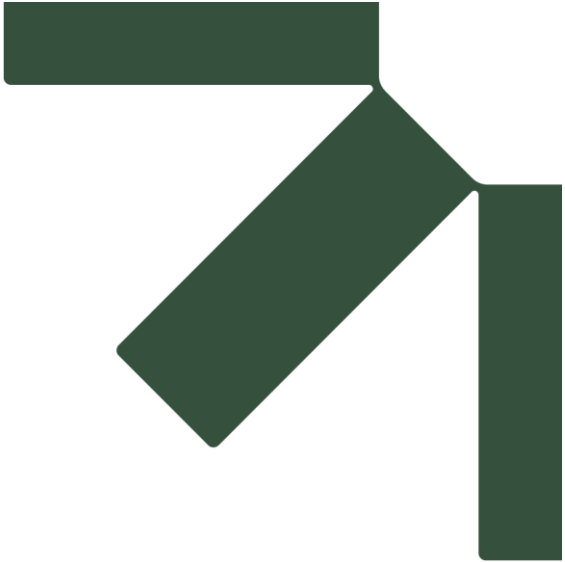
Imagery © Airbus DS/Spot Image 2016

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The results provided in this tool are generated using the best available mapping and knowledge of species habitat requirements.

This map is valid as at the date the report was generated. Checking the [Biodiversity Values Map viewer](#) for mapping updates is recommended.



Appendix E BioNet Atlas Search Results

BDAR Waiver Request

72 and 82-86 Menangle Road, Camden

Homes NSW

SLR Project No.: 630.032888.00001

18 May 2026

Table F 1 Bionet Atlas Search Results within 10km buffer of the subject site

Scientific Name	Common Name	NSW Status	Comm. Status	No. of Records
<i>Oxyura australis</i>	Blue-billed Duck	V,P		3
<i>Stictonetta naevosa</i>	Freckled Duck	V,P		5
<i>Haliaeetus leucogaster</i>	White-bellied Sea-Eagle	V,P		6
<i>Hieraaetus morphnoides</i>	Little Eagle	V,P		1
<i>Lophoictinia isura</i>	Square-tailed Kite	V,P,3		2
<i>Pluvialis squatarola</i>	Grey Plover	V,P	V,C,J,K	4
<i>Gallinago hardwickii</i>	Latham's Snipe	V,P	V,J,K	5
<i>Callocephalon fimbriatum</i>	Gang-gang Cockatoo	E1,P,3	E	3
<i>Lathamus discolor</i>	Swift Parrot	E1,P	CE	9
<i>Parvipsitta pusilla</i>	Little Lorikeet	V,P		4
<i>Ninox strenua</i>	Powerful Owl	V,P,3		23
<i>Climacteris picumnus victoriae</i>	Brown Treecreeper (eastern subspecies)	V,P	V	1
<i>Pyrrholaemus sagittatus</i>	Speckled Warbler	V,P		7
<i>Daphoenositta chrysoptera</i>	Varied Sittella	V,P		1
<i>Artamus cyanopterus cyanopterus</i>	Dusky Woodswallow	V,P		8
<i>Petroica boodang</i>	Scarlet Robin	V,P		1
<i>Dasyurus maculatus</i>	Spotted-tailed Quoll	V,P	E	1
<i>Phascolarctos cinereus</i>	Koala	E1,P	E	1
<i>Lasiorhinus latifrons</i>	Southern Hairy-nosed Wombat	E1,P		1
<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox	V,P	V	54
<i>Saccolaimus flaviventris</i>	Yellow-bellied Sheath-tail-bat	V,P		5
<i>Micronomus norfolkensis</i>	Eastern Coastal Free-tailed Bat	V,P		51
<i>Chalinolobus dwyeri</i>	Large-eared Pied Bat	E1,P	E	7
<i>Falsistrellus tasmaniensis</i>	Eastern False Pipistrelle	V,P		19
<i>Myotis macropus</i>	Southern Myotis	V,P		6
<i>Scoteanax rueppellii</i>	Greater Broad-nosed Bat	V,P		21
<i>Miniopterus australis</i>	Little Bent-winged Bat	V,P		20
<i>Miniopterus orianae oceanensis</i>	Large Bent-winged Bat	V,P		51
<i>Meridolum corneovirens</i>	Cumberland Plain Land Snail	E1		20
<i>Pultenaea pedunculata</i>	Matted Bush-pea	E1		5
<i>Callistemon linearifolius</i>	Netted Bottle Brush	V,3		1



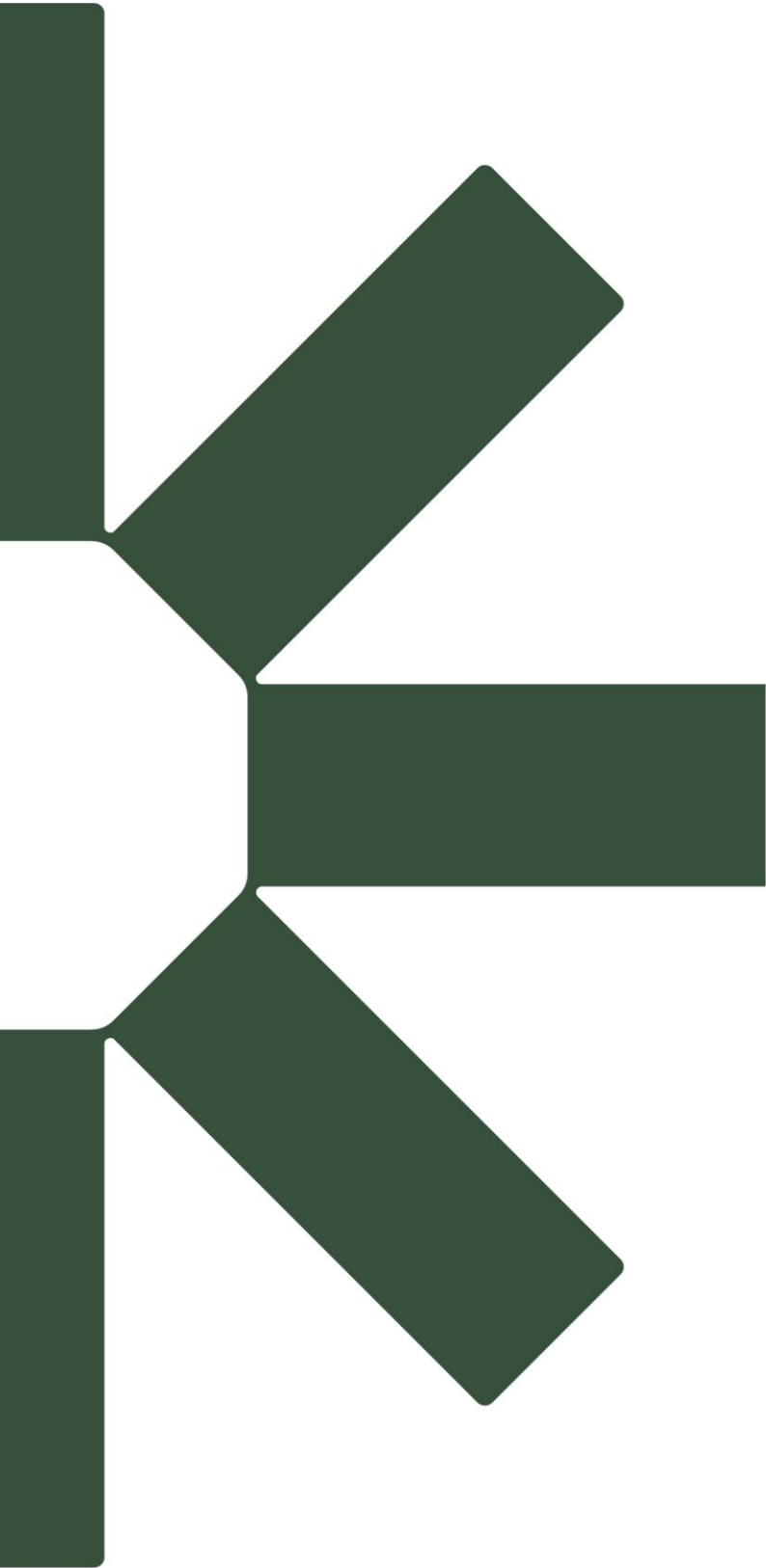
Scientific Name	Common Name	NSW Status	Comm. Status	No. of Records
<i>Eucalyptus benthamii</i>	Camden White Gum	E4A	CE	9
<i>Eucalyptus nicholii</i>	Narrow-leaved Black Peppermint	V	V	1
<i>Eucalyptus scoparia</i>	Wallangarra White Gum	E1	V	1
<i>Pomaderris brunnea</i>	Brown Pomaderris	E1	V	1
<i>Pimelea spicata</i>	Spiked Rice-flower	E1	E	385

*Data from the BioNet Atlas website, which holds records from a number of custodians. The data are only indicative and cannot be considered a comprehensive inventory and may contain errors and omissions. Species listed under the Sensitive Species Data Policy may have their locations denatured (^ rounded to 0.1°C; ^^ rounded to 0.01°C. Copyright the State of NSW through the Department of Planning, Industry and Environment. Search criteria: Licensed Report of all Records of Threatened (listed on BC Act 2016) or Commonwealth listed Entities in selected area [North: -34.01 West: 150.64 East: 150.74 South: -34.11] recorded since 09 Feb 2016 until 09 Feb 2026 returned a total of 737 records of 35 species. (Report generated on 9/02/2026 1:45 PM).

***Key NSW status:** 1 = Sensitivity Class 1; 2 = Sensitivity Class 2; 3 = Sensitivity Class 3; CC = Collapsed Ecological Community; CH = Critical Habitat; E1 = Endangered; E2 = Endangered Population; E3 = Endangered Ecological Community; E4 = Extinct; E4A = Critically Endangered; E4B = Critically Endangered Ecological Community; EW = Extinct in the Wild; KTP = Key Threatening Process; P = Protected; V = Vulnerable; V2 = Vulnerable Ecological

***Key Comm. status:** C = CAMBA; J = JAMBA; K = ROKAMBA; CD = Conservation Dependent; CE = Critically Endangered; E = Endangered; V = Vulnerable; KTP = Key Threatening Process; X = Extinct; XW = Extinct in the Wild.





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