

**ATTN: Andrew Pender**  
**apender@pmdl.com.au**

**2a-2b Gordon Street, Roselle NSW BDAR Waiver Application**  
**ADE Tender Reference Number: A403021.1611.00**

Dear Andrew,

Please find attached the results of the BDAR Waiver at 2a/b Gordon, Rozelle., If you have any questions, please do not hesitate to call me on 0437 378 420.

Yours sincerely,



**Sarah Grady**  
B.Env. Sc (BAAS19065)  
**Principal Scientist**

## Introduction

Name and contact details: PMDL Architects, Andrew Pender on behalf the Catholic Archdiocese Sydney.

ADE Project ID: A403021.1611.00

This BDAR waiver assessment was undertaken by ecological consultants Sarah Grady B. Env. Sc, Principal Scientist (BAM Accredited Assessor. BAAS19065) and Kaitlyn Cavanagh (B. Wildlife Sc.), Environmental Scientist.

## Background

ADE Consulting Group was engaged by PMDL to undertake a Biodiversity Assessment Report (BDAR) Waiver to support the refurbishment of an offsite Campus facilities for St Aloysius College, in Rozelle NSW 2039 by the Catholic Archdiocese Sydney.

The proposed development site involves the refurbishment of an existing building which has been unoccupied since January 2021.

As noted in the fact sheet 'How to apply for a BDAR waiver for a Major Project Application' (2019) published by the DPIE, the *Biodiversity Conservation Act 2016* (BC Act) requires that an SSD application be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning/Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. This memo seeks to provide information to assist the Planning/Environment Agency Head in making this determination.

This memo has been prepared to demonstrate that the proposed development would not impact on biodiversity values. As such, a BDAR is not required, and the proposed development should be considered exempt from satisfying Clause (2) of Section 7.9 of the BC Act.

## Site details

The site is identified as 2a-2b Gordon Street, Roselle NSW 2039 being Lot 1 on DP169780 (0.3484ha). The site is within Inner West Council LGA. The site is within a highly developed urban developed area, with the Gordon St site containing no native vegetation. Appendix A shows the Historic Aerial Imagery for the site and Appendix B shows the site location map.

The proposed works at 2a-2b Gordon St will occur internally within the existing building, with no planned external construction outside of the physical building. See site Appendix C for the site plans.

## Assessment Results

Table 1 below provides an assessment of the proposed development against the defined biodiversity values. This assessment has been undertaken by a suitable qualified person in accordance with the requirements in DPIE's fact sheet.

*Table 1 Impacts of the proposed development on biodiversity values*

Biodiversity value	Meaning	Explain and document potential impacts including additional impacts prescribed under the BC Regulation
Vegetation abundance – 1.4(b) BC Regulation	Occurrence and abundance of vegetation at a particular site	<p><b>The Proposal is unlikely to have an impact on the occurrence and abundance of vegetation.</b></p> <p>The proposed development at 2a-2b Gordon Street will have no impact on native vegetation as the construction will be contained within the existing building. No trees exist on the site.</p>
Vegetation integrity 1.5(2)(a) BC Act	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	<p><b>The Proposal is unlikely to have an impact on vegetation integrity within the Proposal site or the surrounding area.</b></p> <p>The proposed development at 2a-2b Gordon Street will have no impact on native vegetation as the construction will be contained the existing building. No trees exist on the site.</p>
Habitat suitability 1.5(2)(b) BC Act	Degree to which the habitat needs of threatened species are present at a particular site	<p><b>The Proposal is unlikely to have an impact on habitat suitability.</b></p> <p>No vegetation or habitat is present within the proposed development site. The building was inspected during a site investigation to observe habitat features including within the building structure. No habitat was found for threatened species or ecological communities.</p> <p>The Biodiversity Values Map shows no mapped biodiversity values within or within proximity to the proposed development site (See appendix D).</p>
Threatened species abundance 1.4(a) BC Regulation	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	<p><b>The Proposal is unlikely to have an impact on threatened species abundance.</b></p> <p>No vegetation or habitat is present within the proposed development site. The building was inspected during a site investigation to observe habitat features including within the building</p>

Biodiversity value	Meaning	Explain and document potential impacts including additional impacts prescribed under the BC Regulation
		structure. No habitat was found for threatened species or ecological communities. The Biodiversity Values Map shows no biodiversity values within or within proximity to the proposed development site (See appendix D).
Habitat connectivity 1.4(c) BC Regulation	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	<b>The Proposal is unlikely to have a significant impact on habitat connectivity.</b>  No vegetation or habitat for threatened species is present within the proposed development site.
Threatened species movement 1.4(d) BC Regulation	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	<b>The Proposal is unlikely to have a significant impact on threatened species movement.</b>  No vegetation or habitat for threatened species is present within the proposed development site.
Flight path integrity 1.4(e) BC Regulation	Degree to which the flight paths of protected animals over a particular site are free from interference	<b>The Proposal is unlikely to have a significant impact on flight path integrity.</b>  The Proposed site is situated in an already modified landscape comprised of residential and industrial buildings and infrastructure. It is possible that threatened species would fly over the Proposed site whilst moving within their home range. This is most likely the case for threatened microbats, raptors, woodland birds and potentially forest owls. The proposed development and construction works are unlikely to impact flight paths of protected animals.
Water sustainability 1.4(f) BC Regulation	Degree to which water quality, water bodies and hydrological processes sustain threatened	<b>The Proposal is unlikely to have a significant impact on water sustainability.</b>  The proposed development site has no waterbodies or watercourses throughout. The proposed construction works will not impact on

Biodiversity value	Meaning	Explain and document potential impacts including additional impacts prescribed under the BC Regulation
	species and threatened ecological communities at a particular site	water quality, water bodies or water processes that sustain threatened species. Erosion controls will be in place to avoid water run off during construction in the event of rain.

## Biodiversity Values Map

The Biodiversity Values Map (BV Map) has been produced by DPIE and is used to identify land with high biodiversity values, as defined by the BC Regulation. It is used as one of the triggers for entry into the Biodiversity Offsets Scheme (BOS) for proposals being assessed under Part 4 of the EP&A Act, except Division 4.1 SSD proposals. The biodiversity values map is a compilation of datasets that have been identified in Section 7.3 of the BC Regulation as being of high biodiversity value.

Querying the map is not typically required for SSD proposals since Section 7.9 of the BC Act requires entry into the BOS for all SSI and SSD proposals. Since the purpose of this memo is to demonstrate that a BDAR is not required for the Proposed development site, the BV Map has been queried to identify any parts of the proposed development site that have been mapped as being of High Biodiversity Value.

Appendix D provides the BV Map for the site and shows that the nearest mapped Biodiversity Value to the site is approximately 450m to the south. There are no mapped Biodiversity Values within or adjoining the proposed development area.

## Conclusion and Recommendations

This assessment has considered the potential impacts of the proposed development on biodiversity values prescribed in Section 1.5 of the BC Act, Section 1.4 of the BC Regulation and the BV Map. The proposed development site is a cleared urban space with no vegetation or other biodiversity values including threatened species, threatened ecological communities, or their habitats being located on the site. The development proposed will not impact upon biodiversity assets and is unlikely to impact adjacent biodiversity assets. No prescribed impacts, as defined under the BC Regulation will result from the proposed development.

No areas of high biodiversity values have been mapped within or adjoining the proposed development site. Based on the findings of the above assessment a BDAR is not required for this proposed development and the proposed development should be considered exempt from satisfying Clause (2) of Section 7.9 of the BC Act, meaning a BDAR will not be required to be

prepared in accordance with the Biodiversity Assessment Method 2017. It is requested that the SEARs do not include the requirement for a BDAR.

## References

ADE Consulting Group (ADE) (2021) Ecological Site Inspection ADE Tender Reference Number: A403021.1611.00

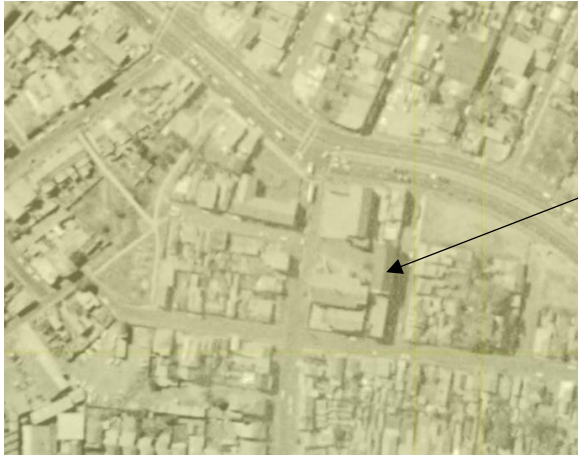
Department of Planning, Industry and Environment (DPIE) (2019) Fact Sheet: How to apply for a BDAR waiver for a Major Project Application. NSW Government, October 2019.

New South Wales Government (NSW Gov.) (2021) Biodiversity Values Map and Threshold Tool. Accessed October 2021 from  
:<https://www.lmbc.nsw.gov.au/Maps/index.html?viewer=BOSEMap>

New South Wales Government (NSW Gov. 2021) Historical Imagery: search and discovery. Accessed October 2021 from:  
<https://portal.spatial.nsw.gov.au/portal/apps/webappviewer/index.html?id=f7c215b873864d44bccdda8075238cb>

Office of Environment and Heritage (OEH) (2021) Biodiversity Value Map and Threshold Tool. Accessed on October 2021 from :  
<https://www.lmbc.nsw.gov.au/Maps/index.html?viewer=BVMap>

## Appendix A: Historical Aerial Imagery



1970: Proposed  
development location



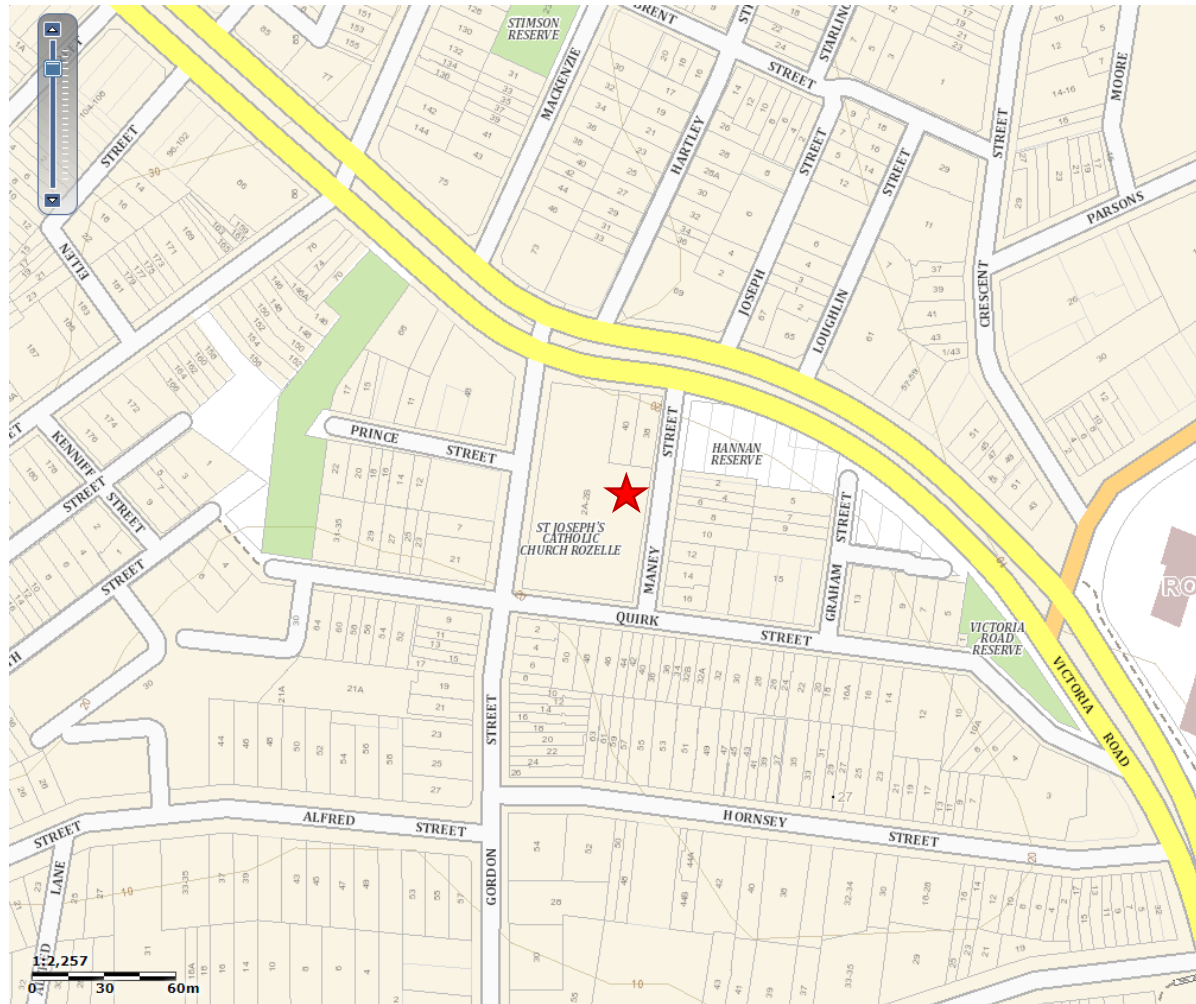
1984: Proposed  
development location



2005: Proposed  
development location

## Appendix B: Location Map





★ Proposed development location

## Appendix C: Site plan



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**Site Plan**

**SAC Remote Site**

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## Appendix D: Biodiversity values map





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