Minarah College
C/O Midson Group
Minarah College Catherine Fields

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31st May 2022

To whom it may concern,

This Biocertification Letter Report has been prepared by Narla Environmental on behalf of the Minarah College (the 'Applicant'). It accompanies an Environmental Impact Statement (EIS) in support of State Significant Development Application (SSD-30759158) for Minarah College Catherine Fields at 268 and 278 Catherine Fields Road, Catherine Field (Lot 11/DP 833983, Lot 12/ DP 833784, the 'Site', **Figure 1**, **Figure 2**, **Figure 3**, **Figure 4**).

Minarah College Catherine Fields will be a co-educational K-12 school accommodating 1,580 students, 840 in primary school and 660 in high school. There will also be an Early Learning Centre (ELC) for 60 students and a School for Specific Purpose (SSP) for 20 students. The new school will be constructed in stages, growing in line with growth in the local population.

The proposal seeks consent for:

- Demolition of the existing dwellings and ancillary structures on-site;
- The construction of the following:
    - One-storey early learning centre with attached two-storey administration building to service the high school and early learning centre;
    - Two-storey primary school building comprising of primary school classrooms, SPP classrooms, primary school hall which attached outside school hours care (OSHC);
    - Two-storey high school building comprising high school classrooms;
    - Two-storey high school hall;
    - Shared one-storey canteen adjoining the high school building; and
    - Shared library located on the second storey above administration building below.
- Site access from Catherine Fields Road at two points with a bus zone, 30 kiss and drop car parking spaces, and car parking;
- Consolidation of the allotments;
- Associated site landscaping and public domain improvements;
- An on-site car park for 123 parking spaces;
- Sewerage treatment plant and effluent management areas; and
- Construction of ancillary infrastructure and utilities as required.

The purpose of this Biocertification Letter Report is to outline if the development is on biodiversity certified land, provide information to identify the site and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.

Response to SEARs

This Biocertification Letter Report is required by the Secretary's Environmental Assessment Requirements (SEARs) for SSD-30759158. Table 1 identifies the SEARs and relevant reference within this report.

Table 1. SEARs and Relevant Reference

SEARs Item	Report Reference
Biodiversity: – 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.	Narla Environmental (2022) Biocertification Letter Report: Minarah College. Final v2.0.

Figure 1 The Location of the Site.

Figure 2 Site Plan (Tonkin Zulaikha Greer Architects 2022).

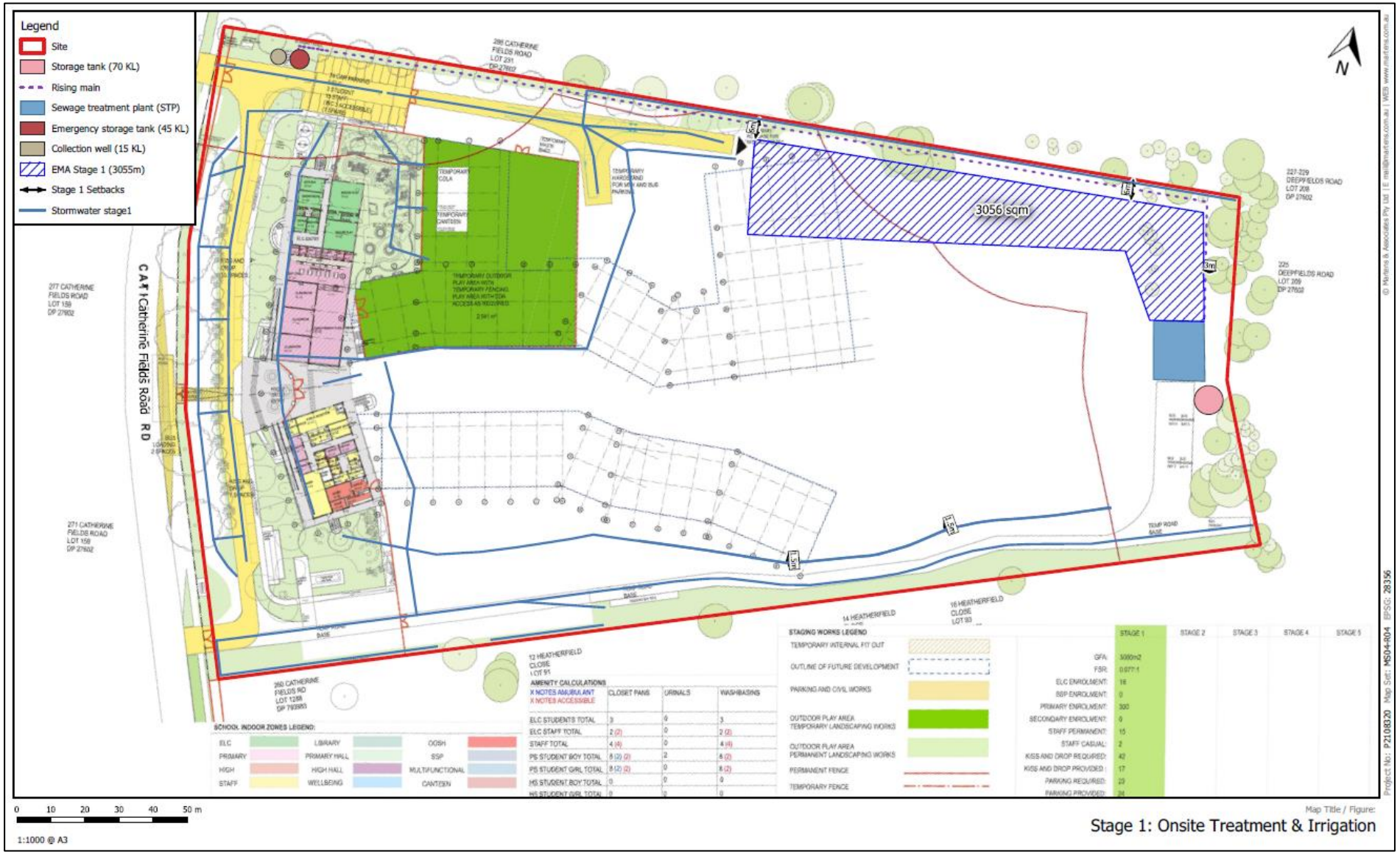

Figure 3 Stage 1: Onsite Treatment and Irrigation (Martens & Associates 2022).

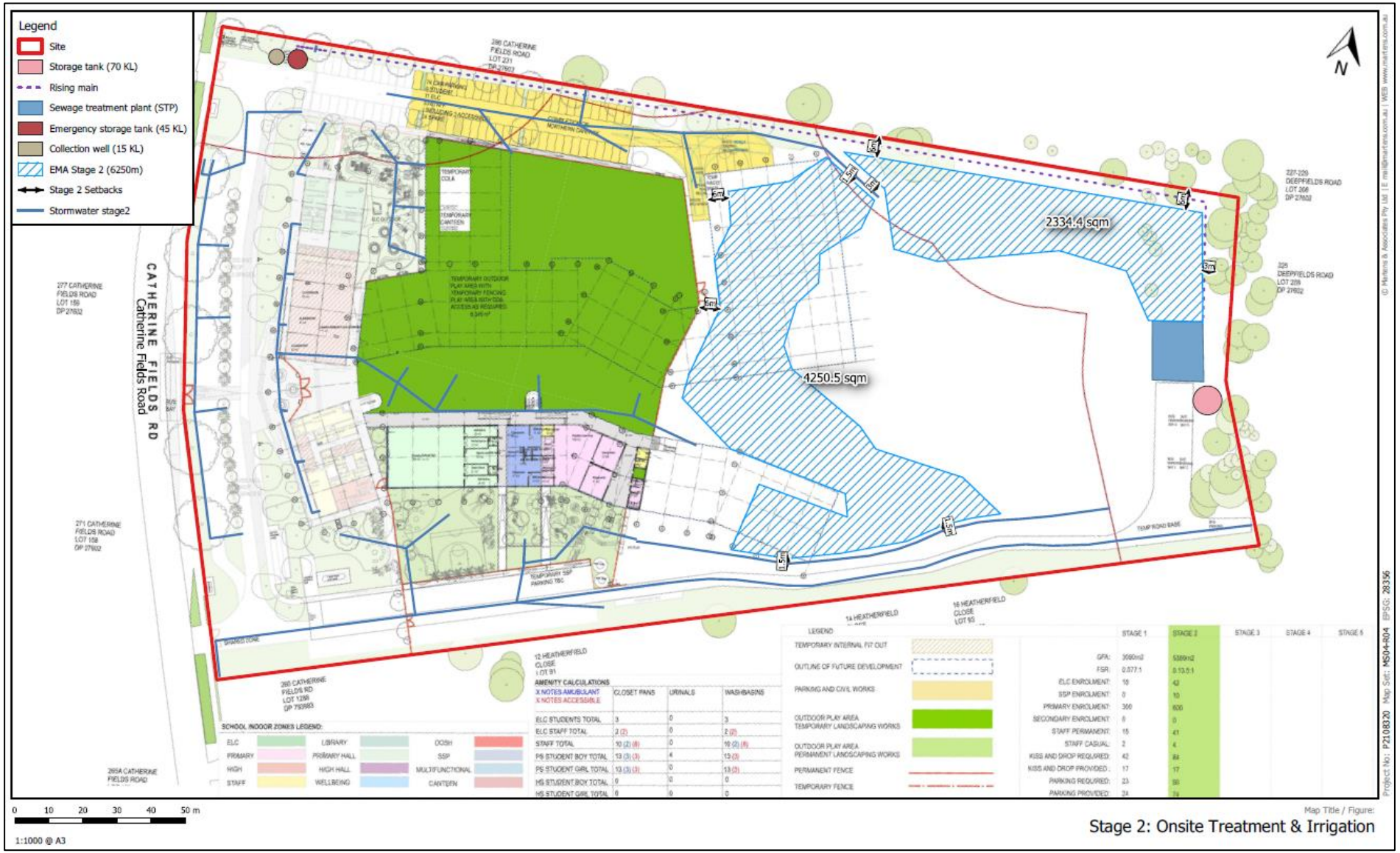

Figure 4 Stage 2: Onsite Treatment and Irrigation (Martens & Associates 2022).

Biodiversity Certification

The Department of Planning and Environment (DPE) maintains a register of orders conferring biodiversity certification as required by section 9.7(f) of the Biodiversity Conservation Act 2016 (BC Act) and section 126ZU of the repealed Threatened Species Conservation Act (TSC Act). State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (Growth Centres SEPP), which now comes under Chapter 3 of the State Environmental Planning Policy (Precincts—Western Parkland City) 2021, is listed within the aforementioned register.

The Site is mapped within the State Environmental Planning Policy (Precincts—Western Parkland City) 2021 within the 'South West Growth Centre' as 'Certified Area' (**Figure 5**), referring to biodiversity certification under the former TSC Act.

Under Section 35 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017: Biodiversity certification that was conferred on land under Part 7AA of the Threatened Species Conservation Act 1995 and that was in force on the repeal of that Act is taken to be biodiversity certification conferred on the land under Part 8 of the new Act (BC Act).

Therefore, in accordance with section 8.4 of the BC Act, under Part 4 of the Environmental Planning and Assessment Act 1979, an assessment of the likely impact on biodiversity of development on biodiversity certified land is not required.

Commonwealth Strategic Assessment

The Commonwealth Environment Minister has endorsed the Sydney Growth Centres Strategic Assessment Program, and approved all actions associated with development of the Sydney Growth Centres as described in the Program Report (NSW Department of Planning 2010). The need for site-by-site approvals under the Environment Protection Biodiversity Conservation Act 1999 (EPBC Act) for the approved actions is no longer required, as long as the actions are consistent with the endorsed Program. The Site is therefore exempt from further assessment under the EPBC Act.

Figure 5 South West Growth Centre- Biodiversity Certification (State Environmental Planning Policy (Precincts—Western Parkland City) 2021).

State Environmental Planning Policy (Precincts—Western Parkland City) 2021

The Site is mapped within the 'Catherine Fields South West Growth Centre Precinct Boundary'; however, is not mapped as 'Land to Which the Camden Growth Centre Precinct Plan Applies' within the 'South West Growth Centres Land Application Map'; therefore, the development controls of 'Appendix 5: Camden Growth Centre Precinct Plan' of the SEPP do not apply.

Project Design Impact Minimisation

The proponent engaged Narla to prepare a preliminary Ecological Constraints Assessment Report (Narla 2021) to identify all ecological constraints within the Site so that they could be adequately avoided or their impacts effectively mitigated.

A number of threatened ecological communities were identified with the Site, including (**Figure 6**):

- BC Act Listed Critically Endangered Ecological Community: River-Flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South East Corner bioregions (RFEF);
- BC Act Listed Critically Endangered Ecological Community: Cumberland Plain Woodland in the Sydney Basin Bioregion (CPW); and
- EPBC Act Listed Critically Endangered Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (CPSW).

Where possible, the proposed development has been positioned in order to minimise impacts on threatened ecological communities (TEC) with impacts focused on areas containing primarily exotic species and areas of TEC's present in the form of isolated paddock trees (**Figure 6**). The Stage 1 and 2 temporary effluent management areas proposed within the Site (**Figure 3**, **Figure 4**) are restricted to within the footprint of the final development footprint, which has minimised the needed for further vegetation removal. Furthermore, a number of species proposed for planting within the Landscape Plan (Taylor Brammer Landscape Architects 2021) are species representative of TEC's RFEF, CPW and CPSW, further conserving the TEC's within the Site.

No threatened species were identified within the Site during the Ecological Constraints Assessment Survey (Narla 2021). One (1) individual of *Meridolum corneovirens* (Cumberland Plain Land Snail, BC Act- Endangered) was identified within a neighbouring property which was initially considered to be included in the Site; however, has since been excluded. Potential habitat for threatened species within the Site includes a number of large, medium and small hollows that will be removed by the proposed development.

Impact Mitigation Measures

Project Ecologist:

In order to mitigate any further impacts to biodiversity within the Site a suitably qualified Ecologist with a minimum tertiary degree in Science, Conservation, Biology, Ecology, Natural Resource Management, Environmental Science or Environmental Management. The Ecologist must be licensed with a current Department of Primary Industries Animal Research Authority permit and New South Wales Scientific License issued under the BC Act.

The Ecologist will be commissioned to:

- Undertake an extensive pre-clearing survey; delineating habitat-bearing trees and shrubs to be retained/removed;
- Supervise and relocate any fauna residing within the waterbodies proposed for removal;

- Supervise the clearance of habitat trees and shrubs (native and exotic) in order to capture, treat and/or relocate any displaced fauna particularly; and
- Supervise the removal of any other fauna habitat within the Site.

Wastewater Management:

In order to reduce any potential impacts (such as nitrification, sedimentation, moisturization and weed invasion) to TEC's within and directly adjoining the site a number of impact mitigation measures should be applied to wastewater management components, including:

- Effluent Management Areas (EMA's) should be spaced as much as feasible away from TEC's within the Site;
- EMA's should be bordered by sediment fencing, which are to be installed prior to utilisation;
- Regular monitoring of the TEC's adjacent to the EMA's should occur, monitoring for signs of:
    - Dieback;
    - Weed invasion;
    - Increased soil moisture;
    - Increased nutrification;
    - Rubbish; and
    - Sedimentation.
- The Rising Main should not require any tree removal further to what has been identified, a qualified Arborist should be engaged if the Rising Main is to pass in proximity to trees within the Site.

Figure 6 Threatened Ecological Communities located within the Site.

Conclusion

As the Site is situated on Biodiversity Certified land, no further impact assessment under the BC Act of threatened species, populations or ecological communities is required for the proposed development.

Narla are satisfied that the proposed development has been appropriately located within areas of lower ecological value where possible and the implementation of the proposed landscape plan which will see native species planted across the site will minimise impacts on biodiversity values.

Yours sincerely,

Chris Moore,
Project Manager/Ecologist,
Narla Environmental Pty Ltd