

Esther Hughes
 MRA Consulting Group
 esther@mraconsulting.com.au
 0427139702

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RE: BDAR Waiver Request – 5 Kiora Crescent, Yennora

The document has been prepared to request BDAR waiver for a Resource Recovery facility and Transfer Station proposed at 5 Kiora Crescent, Yennora – in support a request for Secretary’s Environmental Assessment Requirements (SEARs). To satisfy “Table 1: BDAR (Biodiversity Development Assessment Report) waiver request information requirements” and “Table 2: Impacts of the proposed development on biodiversity values” of *Fact Sheet Biodiversity development assessment report waiver determinations for SSD and SSI applications* (DPE, 2018), the following details have been compiled and presented below (as Table 1 and Table 2 respectively).

Table 1: BDAR waiver request information requirements

Admin	Proponent: LGA: Project ID: Person(s) completing Table 2:	Kiora One Pty Ltd Cumberland Council TBD Esther Hughes BA (Hons), MA, Grad Dip Urban and Regional Planning, MEnvSc.
Site Details	Site Location: Description of Existing Development: Location Map: Site Map:	5 Kiora Crescent, Yennora (Lot 10/-/DP1233715) The existing development is a clear industrial lot with approval for the construction of 3 industrial warehouse buildings, of which foundational ground works have commenced, and construction works are expected to be completed by early/mid 2023. See Appendix A See Appendix B
Proposed Development		Kiora One propose to commission the approved industrial buildings as facilities for liquid waste processing, depackaging/product destruction, non-destructive drilling mud dewatering and transfer of hazardous waste/ dangerous goods. The facility would accept and process up to 270,000 tonnes of material waste per year across all proposed uses. It is proposed to develop waste facilities at the site capable of handling up to 270,000 tonnes per annum (tpa) of waste in total, comprising of approximately: • 180,000 tpa of liquid waste (including waste cooking oil, sewage sludge and residues, industrial waste residues);

	• 60,000 tpa of drilling muds; • 20,000 tpa of product destruction; and • 10,000 tpa hazardous liquid waste. Processing and storage would be undertaken entirely within the proposed industrial sheds. (See Appendix B for current proposed site plans) and would operate 24 hours a day (2 x 10-12 hour shifts), 7 days a week. No native vegetation would need to be removed for the proposed development.
Impacts on Biodiversity values	See Table 2.

The information provided in this document aims to identify matters potentially applicable to the site under the Biodiversity Conservation Act 2016 (BC Act). The following details are informed by desktop research and an understanding of the site and its environs.

Table 2: Impacts of the proposed development on biodiversity values

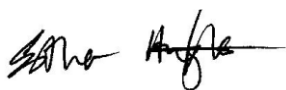
Biodiversity value	Meaning	Relevance (Y/N)	Explanation
Vegetation abundance – 1.4(b) BC Regulation	Occurrence and abundance of vegetation at a particular site.	N	Characteristic vegetation onsite are native and exotic garden plantings at the western, northern and parts of the southern boundary of the site. This vegetation is not indicative of any threatened ecological community. The proposal would not result in further construction or development works. It is not anticipated that vegetation would be removed for the proposed development.
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.	N	The site has been extensively modified for industrial use and is primarily covered in hardstand. Several juvenile and mature trees are present at the boundaries of the site, with occasional mid and ground strata vegetation. The site does not provide essential habitat for any native species and is not reflective of a natural state. The surrounding area is developed for industrial and road use in all directions.
Habitat suitability – 1.5(2)(b) BC Act	Degree to which the habitat needs of threatened species are present at a particular site.	N	Existing vegetation onsite is limited and does not provide for the habitat and life-cycle needs of threatened or endangered species.
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.	N	A preliminary search of the <i>NSW Values Map</i> did not identify any threatened or endangered flora and fauna populations located on the site. The habitat values for threatened communities are absent. Therefore it is improbable that threatened species, threatened ecological communities or threatened species habitat would be impacted as part of this proposal.

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.	N	The site provides limited connectivity for arboreal and avian species through the provision of plantings at the boundaries. No trees would be cleared as part of this proposal and therefore connectivity would not be diminished.
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.	N	The site is not indicative of a wildlife corridor. The limited vegetation onsite does not provide habitat or food sources that contribute significantly to the foraging or lifecycle needs of any threatened species.
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.	N	The development would not interfere with flight-path integrity of any species.
Water sustainability – 1.4(f) BC Regulation	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.	N	The proposed use is not expected to cause impact to water quality, water bodies or hydrological processes. Materials will be stored and processed indoors, avoiding the generation of leachate from stormwater runoff.

The proposed development is not expected to impact native vegetation or fauna habitats. No significant fauna habitats are present at the site, therefore limiting the potential impact the proposed development may have to threatened species or other ecological communities. Processing of recyclables at the site and additional works to the external hardstand area are unlikely to affect habitat connectivity within the site due to the nature of existing heavy industrial use of the site. Considering the inert nature of additional material proposed to be processed in the existing industrial shed, no indirect impacts are expected to occur to flora or fauna offsite.

Based on the above assessment, MRA considers that the BDAR waiver as requested for the SEARs to be amended for the site is appropriate for the current proposal. Should further information or clarification be required on any of the above details, please feel free to contact the undersigned.

Sincerely,



Esther Hughes

Principal Environmental Consultant

MRA Consulting Group

Appendix A – Proposed Site and Existing Development



Source: Nearmap, 2022.

Appendix B – Site Plan - approved development

