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23 September 2022

Our ref: 22SUT-3703

Zauner Construction
Suite 10, 132 Princes Highway
Ulladulla NSW 2539

Attention: Adrien Clements

Dear Adrien,

Budawang SSP – Letter amendment to BDAR (ELA 2021)

INTRODUCTION

Eco Logical Australia Pty Ltd (ELA) has been engaged by Zauner Construction, on behalf of School Infrastructure NSW (SINSW) to undertake an ecological assessment of a small area of land and existing buildings (the 'subject site') (Figure 1). The subject site is located on the southern boundary of the Budawang School for Specific Purposes (SSP) development site, on Croobyar Rd, Milton, NSW (Lot 200 // DP 1192140) (Figure 2).

ELA previously prepared a Biodiversity Development Assessment Report (BDAR) (ELA 2021) to support the State Significant Development (SSD) application for the construction of Budawang SSP. State Significant Development approval (SSDA) was granted in 2021 (No. SSD-8845345), with consent conditions dated 30 September 2021. A further ecological assessment was conducted by ELA adjacent to the subject site for the modification of a building for the purpose of converting it to a childcare centre (ELA 2022). Whilst the scope of the BDAR and previous ecological assessment did not cover the subject site for this ecological assessment, these previous surveys covered the area directly north and the building directly to the west of the subject site (Figure 1). This ecological assessment will determine if the findings/recommendations from the original BDAR apply to the proposed modifications to the SSDA.

PROPOSED MODIFICATIONS

The proposed modifications to the original SSDA relate to three areas of the development site: the carpark, the central courtyard; and adjustment of southern boundary to accommodate a future Homebase building. Review of the planning documents and diagrams shows that the first two areas of modification are covered by the scope of the original BDAR and require no further ecological assessment. The adjustment of the southern boundary, however, extends beyond the scope of the original BDAR and will involve the demolition of Block M, Block N, Block O, an awning and seven Trees

(as per the Arboricultural Impact Assessment Report (AIA) 2022 prepared by Allied Tree Consultancy) (Figure 3).

FIELD SURVEY

A field survey of the subject site was conducted by Senior Ecologist Bronwyn Callaghan on Friday 16th September 2022 for approximately 2.5 hours. The field survey aimed to:

- validate the planted native vegetation on the eastern side of the subject site
- search for and assess potential threatened flora and fauna habitats, within the subject site, in particular search all buildings to be demolished (Blocks M, N, and O) for potential microbat habitat and use.

VEGETATION

The main patch of vegetation to be removed within the subject site was located on the north-east side of Blocks N and O and was entirely composed of six small planted native trees, all *Melaleuca leucadendra* (Weeping Teatree), above a weedy lawn composed of exotic grasses and forbs such as *Bromus catharticus* (Prairie Grass), *Poa annua* (Winter Grass), *Hypochaeris radicata* (Catsear), *Trifolium repens* (White Clover) and *Modiola caroliniana* (Red-flowered Mallow) (Figure 4). In addition, there was a small solitary native *Eucalyptus ficifolia* (Red-flowering Gum) on the north-eastern side of Block M (Figure 3, Figure 5). A garden bed along the eastern side of the existing awning contained exotic garden shrubs, such as *Camellia japonica* (Camellia), and weeds such as *Solanum mauritianum* (Wild Tobacco Bush), *Phytolacca octandra* (Inkweed), and *Acetosa sagittata* (Rambling Dock).

The natural distribution of *Melaleuca leucadendra* is across northern Australia, in Western Australia, Northern Territory, and Queensland, as well as in the Moluccas and New Guinea, which is well outside the NSW south coast, on which the development site is located. The natural distribution of *Eucalyptus ficifolia*, likewise, is well beyond the NSW South Coast being restricted to south-west Western Australia. These seven trees, therefore, do not constitute a native vegetation community, or have the potential to develop into one. The inclusion of these trees in the "planted native vegetation" community within the original BDAR (ELA 2021), increases the area of this community by 0.021 ha.

THREATENED SPECIES AND HABITAT

No threatened flora or fauna species were detected during the field survey.

The seven small planted native trees (6 X *Melaleuca leucadendra* (Weeping Teatree) and one *Eucalyptus ficifolia* (Red-flowering Gum)) represent minimal potential habitat for threatened fauna. They were all under 6 m tall and contained no hollows. As plants that produce abundant nectar bearing flowers, they represent potential foraging habitat during the brief flowering period for a number of threatened bird species and the threatened Grey-headed Flying Fox (*Pteropus poliocephalus*). The buildings to be demolished (Blocks M, N, and O) all represent potential habitat for threatened microbats (see below).

Apart from the area of planted native vegetation, the subject site is either covered with existing buildings or is paved with asphalt and therefore represents no potential habitat for threatened flora species. Within the planted native vegetation area, habitat for threatened flora species is very marginal given the ongoing disturbance that has occurred from mowing, construction, grazing and land clearing that this area has been subject to over a long period of time, see Section 1.3.1 of the BDAR.

MICROBAT HABITAT – BUILDINGS TO BE DEMOLISHED

Potential habitat for threatened microbat species was present within the subject site in the form of roof cavities and underfloor areas of the buildings to be demolished (Blocks M, N, and O). Potential access points to both roof cavities and underfloor areas were observed in all three blocks in the form of small gaps between the roofing iron and the supporting beams, and gaps between the floor and foundation walls / board underfloor coverings (Figure 6 and Figure 7) as well as small ventilation holes in the brick foundation walls (Figure 8).

All potential habitat was searched thoroughly, using a spotlight, for signs of microbat habitation. The underfloor areas of all three blocks were very damp to wet, due to the prevailing high rainfall conditions of the previous months and contained a lot of general rubbish (Figure 9). There was no sign of microbat use in the form of guano or odour. In addition, there was usually cobwebs present in all gaps between bearers and joists (e.g., Figure 10), suggesting minimal disturbance by flying animals.

The ceiling cavities of the three blocks contained minimal evidence of any animal use, with very few rat or mice scats observed. No signs of microbat use, such as guano or odour, were observed. Cobwebs were common and present between wooden components of the roofing trusses (Figure 11), suggesting minimal disturbance by flying animals.

Given that all three buildings are in current and regular use as site offices, lunchrooms and for the bathroom facilities, they present marginal potential habitat for microbats. In addition, all three blocks are very close (less than 5 m for Block N) to the current demolition and construction area. This close proximity to the disturbances associated with the active demolition and construction site would likewise deter microbats from using these buildings for roosting habitat.

CONSISTENCY OF MODIFICATIONS WITH BDAR (ELA 2021)

The original BDAR found that all the vegetation within the study area was planted native vegetation and was therefore assessed under the Biodiversity Assessment Method (BAM) streamlined assessment module for planted native vegetation, which does not require the application of the BAM Calculator (BAM-C) to calculate offset requirements. The field survey, detailed above, found that all vegetation in the subject site fits the description of planted native vegetation provided in the BDAR. Therefore, the addition of these trees to the area of planted native vegetation assessed does not change the conclusions or requirements of the original BDAR.

Under Appendix D.2, however, the BAM requires that the suitability of planted native vegetation for use by threatened species be assessed. The field survey found no evidence of any existing threatened fauna or flora species throughout the outdoor areas of the subject land and the planted native vegetation represents minimal potential habitat for threatened flora. The seven planted native trees may provide foraging habitat for Grey-headed Flying-fox, however this is a very minor addition to the amount of planted native vegetation that was assessed under the BDAR, for which a test of significance found there would be no significant impact. Therefore, the additional area of planted native vegetation does not change the conclusions or requirements of the original BDAR with regards to threatened flora or fauna species.

The original BDAR also assessed one building to be demolished for use by, or potential habitat for, threatened microbats and found that there was no evidence of use by threatened bats within and

around the existing buildings. The current field survey, likewise, found no evidence of microbat use in any of the potential habitats provided by the three buildings to be demolished under the proposed modifications (Blocks M, N and O). The demolition of the existing buildings, therefore, is consistent with the findings and conclusions of the BDAR.

MITIGATION MEASURES

As per the requirements of the BDAR, if any fauna species are detected during the proposed works, ELA or an approved wildlife rescue organisation (WIRES) should be contacted for advice and removal. Any cost incurred for any fauna removal will be the responsibility of the Developer and are not included in this ecological assessment.

CONCLUSION

Following review of planning diagrams and field survey to assess ecological values of new areas to be impacted, including vegetation to be removed and buildings to be demolished, ELA concludes that the proposed modifications remain consistent with the original BDAR and do not change the conclusions or requirements of the BDAR.

Regards,

Bronwyn Callaghan
Senior Botanist, ELA

REFERENCES

Eco Logical Australia (ELA), 2022. Budawang School – Ecological Assessment for the Development of a new childcare centre. Prepared for School Infrastructure NSW

Eco Logical Australia (ELA), 2021. Biodiversity Development Assessment Report – Budawang School. Prepared for School Infrastructure NSW

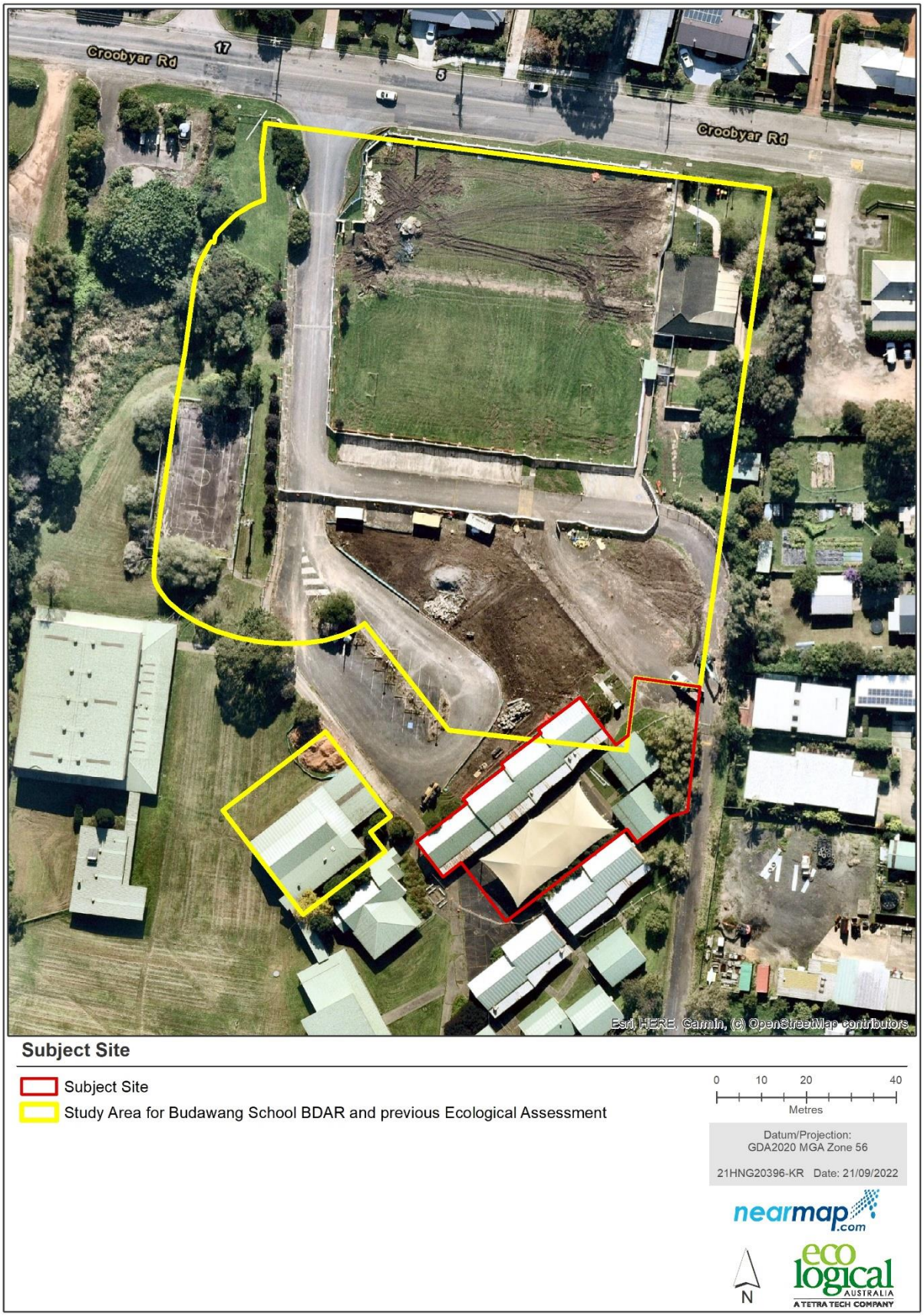

Figure 1: Subject Site

Figure 2: Location map, showing the Subject Site in the context of the Study Area for the BDAR and previous Ecological Assessment

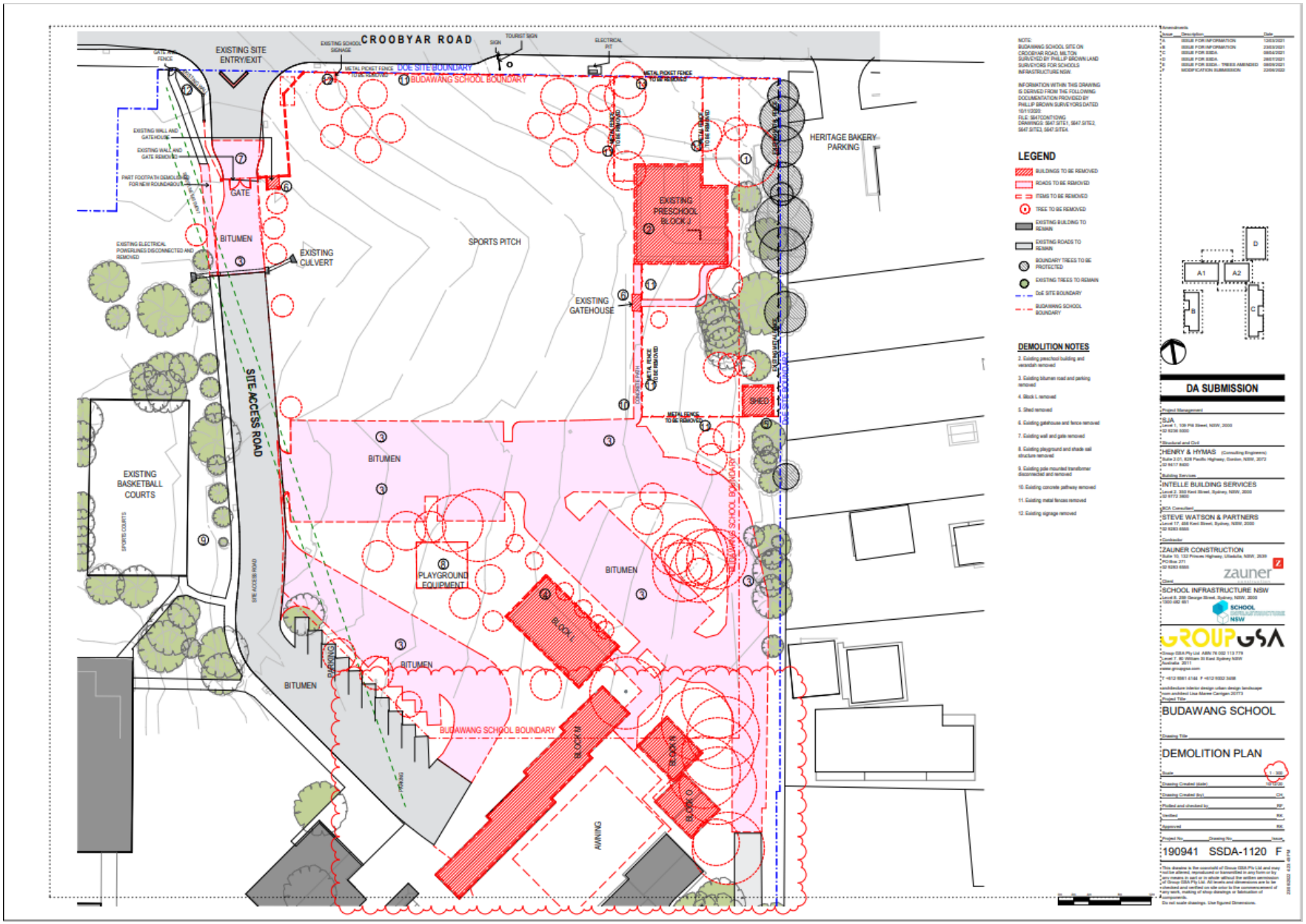

Figure 3: Site demolition plan for proposed modifications to the original Budawang School Development Site

Figure 4: Group of *Melaleuca leucadendra* (Weeping Teatree), above a weedy lawn, on the North-east side of Block N and O

Figure 5: Small *Eucalyptus ficifolia* (Red-flowering Gum) on North-east side of Block M

Figure 6: Gaps between boards covering underfloor openings and ground level, Block N

Figure 7: Gaps between floor and brick foundation wall, Block M

Figure 8: Ventilation holes in brick foundation walls of Block M which potentially allow microbat access to underfloor areas

Figure 9: Underfloor area, Block N

Figure 10: Underfloor area, Block M

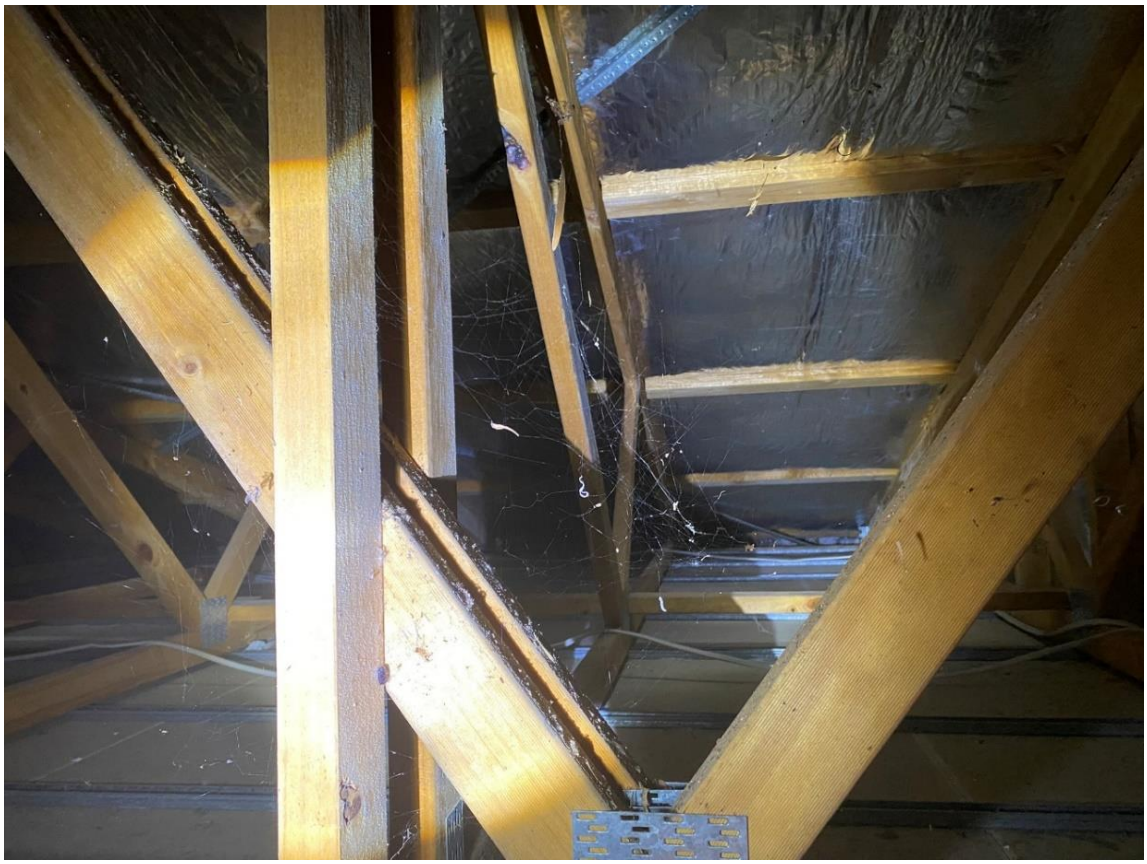

Figure 11: Roofing trusses, Block N