

**Our Ref:** 1812  
**Date:** 4 June 2019

**DIRECTOR  
INDUSTRY ASSESSMENTS  
DEPARTMENT OF PLANNING & ENVIRONMENT  
C/- KDC**

**ATTENTION: KALE LANGFORD**

**Via Email:** kale@kdc.com.au

Dear Kale

**RE: BDAR WAIVER REQUEST LETTER  
PROJECT ID: SSD 9143  
MIXED USE DEVELOPMENT  
52 SINCLAIR ST, GOULBURN**

AEP present here a Biodiversity Development Assessment Report (BDAR) Waiver Request for the above SSD application.

As per Departmental advice, any request for a BDAR waiver must include:

***a) Applicant name and contact details***

Woodlands Ridge Poultry Pty c/- KDC Pty Ltd  
Kale Langford ([kale@kdc.com.au](mailto:kale@kdc.com.au))  
Suite 2B, 125 Bull St, Newcastle West NSW 2302

***b) 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)***

Project ID: SSD 9143. The project is now into the assessment reporting stage, addressing the SEARs.

***c) A description of the development site and Site Map  
&***

***d) A description of the proposed development and Proposed Site Plan***

See description and plans in attached **Appendix A Ecological Assessment Report** and **Appendix B Combined Plans**.

*e) An explanation of why the proposed development is not likely to have any significant impacts on biodiversity values.*

<b>Impacts on Biodiversity Values from the Proposed Development</b>			
<b>Biodiversity values</b>	<b>Meaning</b>	<b>Relevant (✓ or N/A)</b>	<b>Explain and document significance of likely impacts</b>
<b>Vegetation integrity</b>	Degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape have been altered from a near natural state	✓	<p>There is a patch of remnant Tablelands Low Woodland in the northwest of the site. The proposed development plans to mainly avoid this remnant vegetation, with approximately 0.12ha of degraded edge (no canopy present) to be removed.</p> <p>The location of the proposed development is mostly on highly disturbed grassland dominated by exotic species.</p>
<b>Habitat suitability</b>	Degree to which the habitat needs of threatened species are present at a particular site	✓	<p>The woodland and dam on site could provide potential habitat for some species. These habitats will be retained by the development.</p> <p>Vegetation on site is part of a small patch of remnant woodland including Box Gum Woodland EEC. This patch has little connectivity with other patches and could provide habitat for highly mobile species.</p>
<b>Threatened species abundance</b>	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	✓	<p>Whilst it is possible that highly mobile threatened species could visit the site, such use if at all is likely to be very limited, and certainly such species would not be dependent on any habitat present.</p>
<b>Vegetation abundance</b>	Occurrence and abundance of vegetation at a particular site	✓	<p>As previously mentioned, a small patch of Tablelands Low Woodland is present to the north west of the site, with a near-monocultural stand of Radiata Pine immediately to its south. This covers approximately 1.2ha. Approximately 0.12ha of degraded edge of this community is proposed to be removed as part of the development.</p>

### Impacts on Biodiversity Values from the Proposed Development

Biodiversity values	Meaning	Relevant (✓ or N/A)	Explain and document significance of likely impacts
<b>Habitat connectivity</b>	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	✓	<p>The site is part of a small patch of woodland including Box Gum Woodland EEC. This patch has very little connectivity to other patches in the vicinity, being surrounded by disturbed grassland.</p> <p>Only highly mobile threatened species could realistically visit the site, and such mobility enables the wider vegetation matrix adjacent to be accessed.</p>
<b>Threatened species movement</b>	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	✓	<p>The site is highly unlikely to contribute in any way to threatened species movements. There is little vegetation connectivity across the site, and between vegetation onsite and offsite. Preferable habitat and movement corridors are present over 300m east of the site.</p>
<b>Flight path integrity</b>	Degree to which the flight paths of protected animals over a particular site are free from interference	N/A	<p>Development as proposed will not affect any flight path integrity for protected animals. The development will not increase fragmentation or intercept flight paths due to the low existing connectivity between vegetation patches.</p>
<b>Water sustainability</b>	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site	✓	<p>There is a single farm dam in the southwest of the site. There is little vegetation around this waterbody, making it an unlikely site to provide habitat for threatened species.</p>

*Template from D. Gibson (Department of Planning and Environment, pers. comm. 2018).*

***f) Any supporting documentation required to explain the likely impacts on any biodiversity values relevant to the development site.***

The absence of direct impact on remnant native vegetation communities and habitat resources that may potentially be important to threatened species, shows that no relevant thresholds under the *Biodiversity Conservation Act* would be triggered to cause the need for a BDAR to be prepared.

Detailed analysis of Biodiversity Offset Scheme thresholds is presented in the attached Ecological Assessment Report, including biodiversity values mapping, clearing thresholds and the 5-part test of significance.

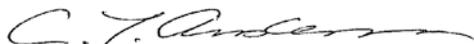
**Summary:**

The information presented in the report and Appendices clearly shows that no threatened species, ecological communities and/or their habitats will be notably affected by the development as proposed.

Based on the information presented, we seek Departmental agreement to a BDAR Waiver for this project.

Should you require any further details or clarification, please do not hesitate to contact the writer.

Yours faithfully,  
**ANDERSON ENVIRONMENT & PLANNING**



**CRAIG ANDERSON  
DIRECTOR  
Biodiversity Accredited Assessor BAAS: 17002**

**Attachments:  
Appendix A – Ecological Assessment Report  
Appendix B – Combined Plans**