

18 October 2021

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Karen Harragon
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NSW Department of Planning, Industry and Environment
320 Pitt Street
Sydney NSW 2000

**Re: Biodiversity development assessment report waiver,
Meadowbank TAFE Multi-Trades and Digital Technology Hub,
See Street, Meadowbank**

Dear Karen,

This letter provides information regarding the biodiversity assessment for TAFE Meadowbank Multi-Trades and Digital Technology Hub and associated multi-storey carpark at See St, Meadowbank (the site). This information has been provided to support a request to waive the requirement to complete a biodiversity development assessment report (BDAR) as part of the State Significant Development application, SSD 10349.

A BDAR waiver request was originally lodged with the request for SEARs on 14 June 2019. On 5 August 2019 and during assessment of the waiver request, the Department of Planning, Industry and Environment (DPIE) and the Environment, Energy and Science Group (EESG) requested that daytime roost searches for threatened microbat species be carried out in accordance with the guidelines on page 9 of “Species credit’ threatened bats and their habitats” (OEH 2018). Searches were undertaken within Building N (former childcare centre) and a small substation kiosk (both of which are to be demolished under a separate planning approval pathway). It is confirmed that no microbat species were located on the site during the daytime roost searches and no evidence of their presence was found (refer Appendix D).

The request for a BDAR waiver was granted on 22 August 2019. The letter noted that the waiver had been issued for the development proposed in the request for SEARs, and any amendments to the development may require a further waiver to be sought and issued.

Since lodgement of the original BDAR waiver request, the project scope was revised to include the Digital Technology Hub (as part of the Multi-Trades Hub) resulting in a small increase to the original development footprint. Accordingly, a revised BDAR waiver request was prepared and a revised BDAR waiver was granted by DPIE and EESG on 30 September 2019.

Subsequent to the issue of the revised BDAR waiver, the project scope has been revised to include a new multi-storey carpark facility that is proposed to be constructed where an existing at-grade staff car park is currently located (adjacent to Block J), resulting in an increased development footprint proposed as part of SSD 10349. Accordingly, the SSD application now seeks approval for the:

- Multi-Trades and Digital Technology Hub; and
- multi-storey car park adjacent to Block J.

The multi-storey carpark facility includes design updates in response to DPIE-issued SSD draft conditions Rev 1/ condition B1, which requests that the car park building be relocated away from See Street. This resulted in an additional three trees proposed to be removed above that previously considered. A site inspection was completed on 25 March 2020 to identify trees and habitat features in the proposed Block J carpark expansion area. The additional three trees are included in this assessment and are covered in the plant species inventory in Appendix C.

The multi-storey carpark facility has subsequently undergone a design modification to include an additional two carpark levels. The modification of the multi-storey carpark facility will not require additional tree removal.

EMM Consulting Pty Ltd (EMM) has prepared a BDAR waiver request for the application in accordance with the biodiversity development assessment report waiver determinations for SSD and SSI applications fact sheet prepared by DPIE, as detailed in Table 1 and Table 2, below. The waiver request has been prepared by a qualified ecologist on behalf of the applicant, TAFE NSW.

We request that DPIE waive the BDAR requirement for the application given the highly disturbed nature of the site. We are happy to discuss any questions in relation to this site.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Steven Ward', with a stylized flourish underneath.

Dr Steven Ward

sward@emmconsulting.com.au

References

OEH 2018, *'Species credit' threatened bats and their habitats. NSW survey guide for the Biodiversity Assessment Method*, NSW Office of Environment and Heritage, Sydney.

Table 1 BDAR waiver request Information requirements

Admin	1. Proponent name and contact details: - Hansen Yuncken c/- Keylan Consulting Pty Ltd. - Contact details – Name: Dan Keary, Mobile: 0429 565 291, Email: dan@keylan.com.au. 2. Project ID: - TAFE Meadowbank. See Street, Meadowbank 2114. 3. Name/ ecological qualifications of person completing TABLE 2: - Katie Diver – Associate Ecologist, Accredited Assessor (BAAS17013). Site inspection. - Jason Brown – Senior Ecologist. Preparation of the report. - Dr Steven Ward – Associate Ecologist, Accredited Assessor (BAAS17037). Review and project management.
Site details	1. Street address, Lot and DP, local government area: See Street, Meadowbank 2114, Lot 11/DP 1232584, City of Ryde. 2. Description of existing development site: The sites are currently used by TAFE Meadowbank as carparks with an overall area of approximately 1.3 ha. It is bounded by See Street to the south east, a power sub-station to the north east, Meadowbank TAFE Children’s Centre to the south-west and Meadowbank TAFE Library to the north-west. The carpark is accessed by an internal road with access points from See Street through to Rhodes Street. A map of the site is provided in Appendix A. Images of the site are provided in Appendix B.
Proposed development	TAFE NSW is undertaking to deliver new, state of the art, specialist education and training facilities at TAFE Meadowbank in the form of a Construction and Buildings Trade Facility (Multi-Trades Hub) and Information and Communications Technology/Cyber Security facility (Digital Technology Hub). The proposed combined Multi Trades & Digital Technology Hub development to the North East of the TAFE Campus (Figure A.1) forms the scope of work for this State Significant Development Application. The development combines various teaching spaces, workshops and a detached multi storage car park, off the main civic address at See Street.

Table 2 Impacts of the proposed development on biodiversity values

Biodiversity value	Meaning	Relevant (✓ or NA)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation
			Attach additional supporting documentation where appropriate
Vegetation abundance 1.4(b) BC Regulation	Occurrence and abundance of vegetation at a particular site	✓	The site consists of planted endemic, non-endemic and exotic tree, shrub and grass species. A total of 17 endemic, seven non-endemic and 7 exotic tree and shrub species, including one priority weed, were recorded within the site (Appendix C). The vegetation present is not considered to form a native vegetation community, due to the high level of disturbance, and extensive landscape plantings. The trees present in the proposed Multi-Trades and Digital Technology Hub are located within small islands which separate rows of parking bays as well as along the front fence line and between the carpark, power sub-station, library and Children’s centre. Two trees located in Block J carpark was observed to contain hollows (Photograph B.6 and Photograph B.7, Appendix B). One tree contained two hollows, a trunk hollow currently occupied by nesting Rainbow Lorikeets (<i>Trichoglossus moluccanus</i>) and a small branch hollow. Another tree was observed to contain a small hollow. No other identifiable habitat features in the form of hollows or nests were recorded. An inventory of all species recorded on site can be found in Appendix C.

Table 2 Impacts of the proposed development on biodiversity values

Biodiversity value	Meaning	Relevant (✓ or NA)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation Attach additional supporting documentation where appropriate
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.	✓	Naturally occurring native vegetation does not occur within the site. The non-endemic, endemic and introduced trees and shrubs are planted in small islands and along fencelines within a bitumen carpark. The site is highly modified essentially now consisting of urban landscaping. Given the high degree of modification, and the absence of native vegetation communities, vegetation integrity data was not collected. No habitat features (including hollows, caves, rocks and nests) are present on site. No water bodies are located on site.
Habitat suitability 1.5(2)(b) BC Act	Degree to which the habitat needs of threatened species are present at a particular site.	NA	One active nest in a tree hollow occupied by Rainbow Lorikeet was observed in Block J carpark (Photograph B.6, Appendix B). No significant fauna habitat features such as caves or rocks were observed on site. No bat species were recorded during the daytime roost searches of the childcare centre and switching station (Appendix D), proposed to be demolished. No threatened flora or fauna predicted to occur in the locality were observed during the site visit. The site may be utilised by commonly occurring mobile native fauna which utilise urban environments such as possums and birds.
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.	✓	The Narrow-leaved Black Peppermint (<i>Eucalyptus nicholii</i>) is listed as a Vulnerable species under the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) and Endangered under the <i>Biodiversity Conservation Act 2016</i> (BC Act). However, the species is endemic to northern NSW and does not naturally occur in the locality. The species has been planted within the site and therefore its genetic provenance is unknown. The species is also occurring outside of its natural habitat and therefore its removal for the proposal will not affect recovery or conservation of the species. It was previously reported that the Wallangarra White Gum (<i>Eucalyptus scoparia</i>), a threatened species also endemic to northern NSW, was planted at the site. During the site inspection on 25 March 2020, the identification of these trees was revised to Brittle Gum (<i>Eucalyptus mannifera</i>). Brittle Gum is not a threatened species listed under the EPBC Act or BC Act. No naturally occurring threatened flora, fauna or ecological communities are present on site. There is no suitable habitat present on site for any threatened species predicted to occur in the locality.
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.	NA	Ecological habitat connectivity on site is negligible. The site is located within a busy education precinct, a light industrial estate is to the north east and residential properties to south. Vegetation within the site is not considered suitable for any threatened species, with no suitable habitat located nearby. Any vegetation clearing and development on site will not impact the connectivity of habitat which facilitates the movement of threatened species across their range. Any species which might currently utilise the site for occasional foraging would be highly mobile.

Table 2 **Impacts of the proposed development on biodiversity values**

Biodiversity value	Meaning	Relevant (✓or NA)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation Attach additional supporting documentation where appropriate
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.	NA	No threatened species were observed on site. No suitable habitat features were observed on site, including hollows, caves, rocks and nests. The site is bordered by a busy road and public/commercial/residential buildings. Any vegetation clearing and development on site will not impact the movement of threatened species, as any species which might currently utilise the site for occasional foraging would be highly mobile.
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.	NA	The site is not located within any known or likely flight paths for protected animals. While the development comprises the construction of a multi-story building it is considered there will be no impact on or interfere with flight path integrity of protected animals over the site.
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.	NA	No waterbodies or waterways supporting threatened species occur in the vicinity of the site. The site does not border water bodies and is located approximately 650 m from the Parramatta River. The development will involve the construction of a new multistorey building and associated carpark, however it is considered there will be no impact on local water bodies or hydrological processes.

Overall, it is concluded that the project will not result in significant impacts on threatened species, populations or communities.

Appendix A

Location map



KEY

- Property boundary
- New carpark
- Multi-trades and digital technology hub
- Rail line
- Local road
- Cadastral boundary

Location map

Meadowbank TAFE
Biodiversity assessment
Figure A.1

Appendix B

Current site images



Photograph B.1 Swamp Mahogany, White Cedar, River She-oak and Stringybark growing along the north east fenceline of the Multi-Trades and Digital Technology Hub carpark



Photograph B.2 Brittle Gum and *Cedrus deodara* growing along the fenceline along See Street, south-east of the Multi-Trades and Digital Technology Hub carpark.



Photograph B.3 River She-oak and Swamp Mahogany growing between the carpark and the existing Library, north-west of the Multi-Trades and Digital Technology Hub carpark.



Photograph B.4 Lemon-scented Gums located in the south-eastern corner of the Multi-Trades and Digital Technology Hub carpark



Photograph B.5 Grassy patch with a Jacaranda, located in the north-eastern corner of the Multi-Trades and Digital Technology Hub carpark



Photograph B.6 Rainbow Lorikeet in hollow in Southern Blue Gum in the Block J carpark



Photograph B.7 **Hollow in Mugga Ironbark in the Block J carpark**

Appendix C

Plant species inventory

Table C.1 **Plant species inventory**

Species name	Common name	Origin*
<i>Acer negundo</i>	Box-elder Maple	Exotic
<i>Angophora floribunda</i>	Rough-barked Apple	Endemic
<i>Casuarina cunninghamiana</i>	River She-oak	Endemic
<i>Cedrus deodara</i>	Deodar Cedar	Exotic
<i>Cestrum parqui</i>	Green Cestrum	Exotic, priority weed for Greater Sydney region
<i>Cinnamomum camphora</i>	Camphor laurel	Exotic
<i>Corymbia citriodora</i>	Lemon-scented Gum	Non-endemic
<i>Corymbia eximia</i>	Yellow Bloodwood	Endemic
<i>Corymbia maculata</i>	Spotted Gum	Endemic
<i>Doryanthes excelsa</i>	Gymea Bay Lilly	Endemic
<i>Eucalyptus botryoides</i>	Bangalay	Endemic
<i>Eucalyptus crebra</i>	Narrow-leaved Ironbark	Endemic
<i>Eucalyptus elata</i>	River Peppermint	Endemic
<i>Eucalyptus haemastoma</i>	Scribbly Gum	Endemic
<i>Eucalyptus microcorys</i>	Tallowwood	Non-endemic
<i>Eucalyptus nicholii</i>	Narrow-leaved Black Peppermint	Non-endemic
<i>Eucalyptus resinifera</i>	Red Mahogany	Endemic
<i>Eucalyptus robusta</i>	Swamp Mahogany	Endemic
<i>Eucalyptus saligna</i>	Sydney Blue Gum	Endemic
<i>Eucalyptus sideroxylon</i>	Mugga Ironbark	Endemic
<i>Eucalyptus</i> sp.	-	Endemic
<i>Eucalyptus globulus</i> subsp. <i>bicostata</i>	Southern Blue Gum	Non-endemic
<i>Eucalyptus mannifera</i>	Brittle Gum	Non-endemic
<i>Jacaranda mimosifolia</i>	Jacaranda	Exotic
<i>Koelreuteria paniculata</i>	Golden Rain Tree	Exotic
<i>Lomandra longifolia</i>	Spiny-headed Mat Rush	Endemic
<i>Lophostemon confertus</i>	Brush Box	Non-endemic
<i>Melia azedarach</i>	White Cedar	Endemic
<i>Pittosporum undulatum</i>	Native Daphne	Endemic
<i>Schinus areira</i>	Peppertree	Exotic
<i>Syzygium luehmannii</i>	Small-leaved Lilly Pilly	Non-endemic

*Endemic to the Sydney region, non-endemic means that the species occurs naturally within NSW, but not within the Sydney region.

Appendix D

Results of daytime bat roost searches

12 August 2019

Amy Conder
Project Manager
GHD
Sent via email to Amy.Conder@ghd.com

Re: Additional information to support BDAR waiver request: Meadowbank TAFE Multi-Trade Centre (SSD-10349)

Dear Amy,

1 Introduction

TAFE NSW lodged a request with the Department of Planning, Industry and Environment to waive the requirement for a Biodiversity Development Assessment Report for the Meadowbank TAFE Multi-Trade Centre on 30 May 2019. The Environment, Energy and Science (EES) are reviewing the request and have asked for additional information relating to the potential for threatened microbats to roost in two buildings proposed for demolition.

Specifically, EES has requested that daytime roost searches are carried out in accordance with page 9 of Species credit threatened bats and their habitats (OEH 2018), and a description of the searches undertaken in a report.

2 Method

The buildings proposed for demolition comprise the existing childcare centre and a small substation. The buildings were searched by Katie Diver on 12 August 2019 between 7:20 – 7:50am. A handheld bat detector (EchoMeter) was carried for the duration of the inspection, to record any calling bats. A visual inspection was made of all cracks and crevices in the buildings to search for roosting microbats, or evidence of their presence (urine stains, droppings, remains and bat fly casings). An inspection camera with a gooseneck was used to inspect cracks and crevices on the outside of the childcare centre building. Access was granted inside the small substation, and therefore inspection was conducted with a torch.

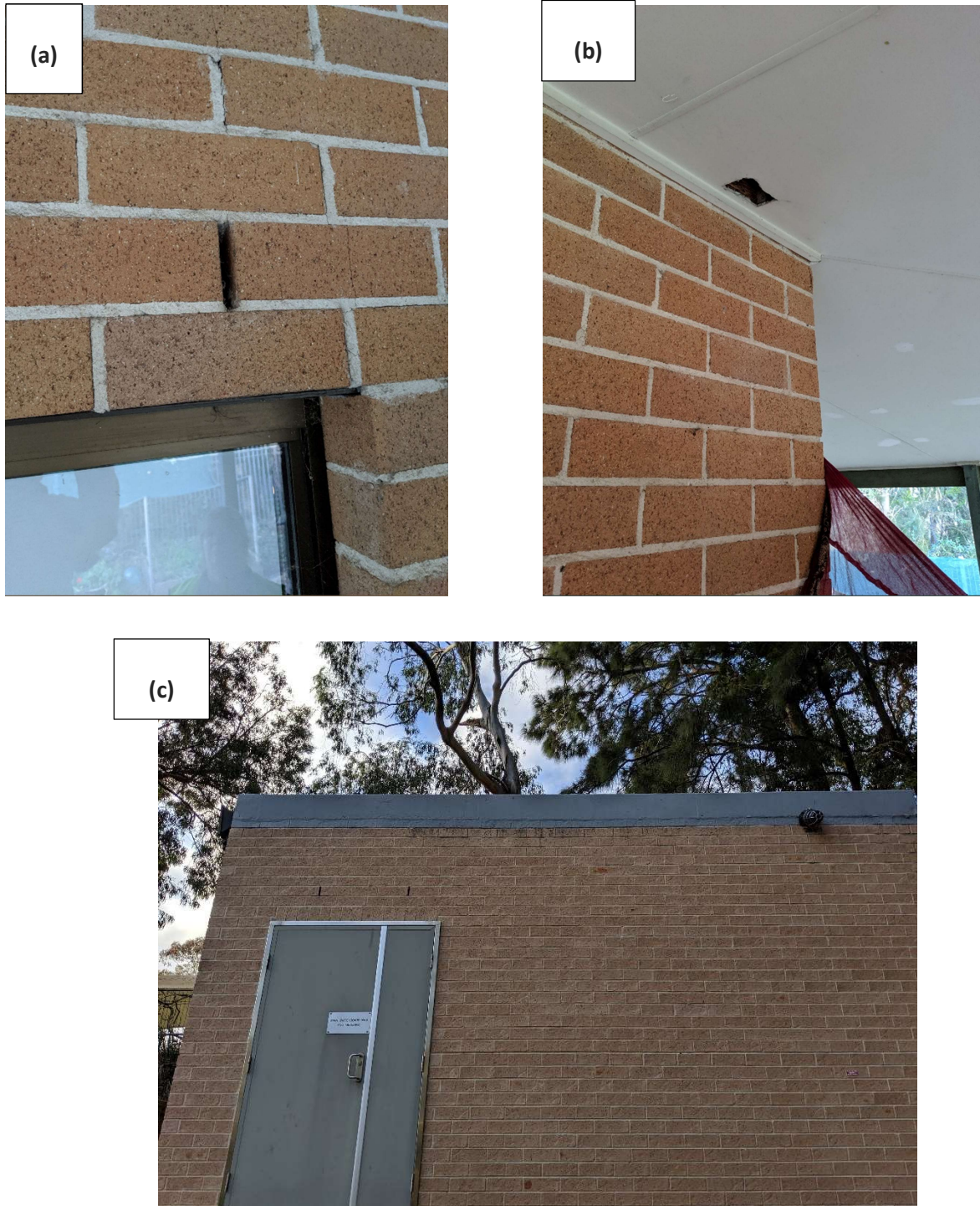
3 Results

Ventilation holes (see (a) in Photograph 3.1) were present in the brickwork on the outside of the childcare centre. The crevices were approximately 1 cm wide and 5 cm deep, making microbat entry possible. No evidence of roosting microbats or their presence was observed in the ventilation holes. Many holes were occupied by spiders or contained spiderwebs, reducing the likelihood of microbat roosting.

A hole had been cut in the eaves of the childcare centre (see (b) in Photograph 3.1), approximately 10 cm x 5 cm in size. The gooseneck of the inspection camera was placed in the hole to search for roosting microbats in the roof cavity. No evidence of roosting microbats or their presence was observed at the entry to the hole or inside the roof cavity.

No evidence or roosting microbats or their presence was observed inside the substation. Additionally, the outer surface of the substation was solid, and ventilation holes had been filled, preventing access for microbats (see (c) in Photograph 3.1) and the inside walls were smooth, making the surface unsuitable for roosting.

In addition, no microbat sonograms were recorded during the survey.



Photograph 3.1 Buildings inspected (a) ventilation holes in childcare centre brick, (b) – hole cut in childcare centre eaves, (c) – outer substation)

4 Conclusion

Although some potentially suitable areas for microbat roosting were observed at the childcare centre, no microbats or evidence of their presence was recorded. The substation does not contain suitable microbat roosting habitat.

Yours sincerely



Katie Diver

National Technical Leader - Ecology

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