16 May 2018

Sandra Hinchey
Director
Webber Architects
Suite 3, L1, 426 Hunter Street
Newcastle NSW 2300

Dear Sandra

Re: Catherine McAuley Catholic College, Medowie Biodiversity Development Assessment Report – Final credit output
Project no. 26652

Biosis Pty Ltd was commissioned by Webber architects to undertake a biodiversity assessment in support of the proposed development at Catherine McAuley Catholic College, and prepare the required Biodiversity Development Assessment Report (BDAR).

This letter is provided in relation to the final credit requirement determined in accordance with the NSW *Biodiversity Assessment Methodology* (BAM 2017) via the BAM Calculator and provided in Section 6 of the BDAR (Biosis 20 April 2018).

Vegetation zones and clearing calculations included in the BDAR account for the entire project footprint and consider all native vegetation removal/disturbance associated with the construction of new buildings, stormwater outfall pipes and other infrastructure, and asset protection zones (APZs).

Total clearing has been assumed in all areas of the construction footprint not relating to stormwater infrastructure and APZs. Partial clearing has been assumed in these areas due to the retention vegetation in one or more strata following completion of proposed works.

To account for the different final vegetation treatments across the vegetation zones, separate zones have been created based on the level of clearing required in each. Future vegetation integrity scores have been reduced to 0 for total clearing zones, with scores for stormwater and APZ zones reduced by a number relative to the vegetation to be retained within each zone. This has been undertaken at a fine scale and resulted in the creation of 12 separate vegetation zones that represent actual vegetation impacts with high resolution. As such many of the zones are small, with 9 representing ≤ 0.1 hectares of vegetation.

The final credit output for the development based on 12 vegetation zones is 23 ecosystem credits.

However, as the BAM Calculator rounds up credit requirements for all zones to a minimum of 1 credit, we feel that this requirement is over-inflated for small zones (≤ 0.1 hectares) where only partial vegetation clearing will occur.

As such we are asking OEH to consider the overall vegetation impacts of the development when determining the final credit requirement for the consent. We believe that a more realistic credit

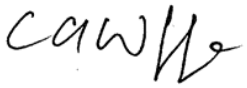
requirement based on actual impacts to native vegetation, and the future ecological character of the site can be achieved, rather than the current requirement for the retirement of 23 ecosystem credits.

Biosis would like to discuss this issue with OEH during the assessment of the development application, however the project's submission deadline for the EIS has been reached. To date we have attempted to make contact with OEH directly, with no response (John Seidel was called and emailed between 10 and 15 May, and the BAM Calculator project has been shared with him, for his reference). We will continue to follow up on the matter following submission of the EIS to reach a resolution.

We ask that this letter be provided as part of the EIS submission and would be happy to receive direct contact from OEH in this regard.

Biosis' point of contact would be the undersigned.

Yours sincerely



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