

Our Ref: 22057 - Biodiversity Assessment – RFI Addendum Letter - Irrawang High School - (DA 16-2023-42-1)
Via: email

Date: 6th October 2023

Attn: Dylan Mitchell
Port Stephens Council
116 Adelaide Street,
Raymond Terrace NSW 2324

Dear Dylan,

RE: BIODIVERSITY ASSESSMENT – RFI ADDENDUM LETTER - IRRAWANG HIGH SCHOOL - (DA 16-2023-42-1)

MJD Environmental has been engaged by APP Corporation Pty Ltd on behalf of Department of Education to prepare an addendum letter to the Biodiversity Assessment prepared by MJD Environmental for the proposed Irrawang High School infrastructure upgrade.

Site Context

The *Biodiversity Assessment Report: Irrawang High School May 2023* (MJD 2023) was prepared to accompany a development application (DA 16-2023-42-1) to upgrade the infrastructure of the existing high school to meet relevant standards and to provide modern education facilities to meet the future needs of students. The Proposal includes extensions to existing buildings and footpaths, and the construction of a new building, internal covered walkways, a new drop off bay, and new entryway as lodged with Port Stephens Council (Council) on 19 September 2023.

This addendum letter has been prepared in response to the project scope amendment, namely an increased development footprint as a result of expanding the existing carparking on site as sought by the Hunter and Central Coast Regional Planning Panel (HCCRPP) and Port Stephens Council. This addendum aims to clarify any alterations to potential direct and indirect impacts of the DA.

Flora Impact

At the time of the Site inspection, vegetation delineation was assessed using API and ground truthing during field survey works (Refer to **Attachment 2**). The vegetation within the Site has been modified through past clearing and plantings, and present land management practices (i.e., mowing to maintain lawns). The current land use has resulted in the modification of native vegetation present, impacting the structure and floristic composition.

The native vegetation on Site was identified as an example of the following Plant Community Type (PCT);

- **PCT 1592:** *Spotted Gum - Red Ironbark - Grey Gum shrub - grass open forest of the Lower Hunter*

The PCT was delineated into a total of two vegetation zones (VZ), driven primarily by condition. Condition encompassed management history, determination of planted or remnant canopy, physical disturbance such as access roads or weed invasion. Complete VZ descriptions are included in MJD 2023, with VZ1 found to be commensurate with the associated Threatened Ecological Community (TEC): *Lower Hunter Spotted Gum Ironbark Forest in the Sydney Basin and NSW North Coast Bioregions*, which is described in MJD 2023 (refer to **Table 3** MJD 2023).

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The following table provides a comparison of the initial and revised impacts to flora associated with the change to design for the Proposal. An increase of 0.04 ha will be impacted. Whilst VZ 1 is commensurate with a Threatened Ecological Community (TEC), the structure of the VZ is highly disturbed as described in MJD 2023 (refer to **Section 4.2.2**).

Vegetation Zone	Initial (ha)	Revised (ha)
VZ1 – PCT 1592: Spotted Gum – Red Ironbark – Grey Gum shrub – grass open forest of the Lower Hunter	0	0.02
VZ2 – PCT 1592: Spotted Gum – Red Ironbark – Grey Gum shrub – grass open forest of the Lower Hunter (Planted)	0.16	0.18
VZ3 – 0.02 ha of Endemic and Exotic Planted Canopy	0.02	0.02
VZ4 – 0.02 ha of Exotic Vegetation	0.02	0.02
Total	0.20	0.24

Using the Table in Clause 7.2 (4) of the Biodiversity Conservation Regulation 2017, the proposed development:

- Has a minimum lot size of less than one hectare; and
- The development proposal does not exceed the 0.25 ha threshold of native vegetation clearing, and therefore does not exceed this BOS threshold.

The southern portion of the study area is mapped as an area of high biodiversity value on the NSW OEH Biodiversity Values Map (BVM), however, in accordance with Section 7.3 (4) of the BC Regulation, the proposed development is exempt from requiring a BDAR.

Therefore, the Proposal – inclusive of the alterations to the carpark design – does not trigger automatic entry into the BOS and a Test of Significance Assessment as previously supplied, is the applicable assessment pathway.

Port Stephens Council Comprehensive Koala Plan of Management (CKPoM)

A review of the assessment for the Proposal against the Port Stephens Council Comprehensive Koala Plan of Management (Refer to Appendix 6 of MJD 2023) found that additional Koala feed trees to the ones identified in the assessment would be removed from the Site to accommodate the alteration to the carpark design.

Previously, the Proposal required the removal of 19 Koala feed trees. To accommodate the alteration to the carpark design, a further ten (10) trees – than the original carpark design – will need to be removed. These trees form part of an area that was classed as marginal koala habitat as per Council's Koala Habitat Planning Map. Seven (7) of the ten (10) extra trees to be removed are Koala feed trees.

The updated list of Koala Feed Trees to be removed from within the development footprint are as follows:

- 1 x *Eucalyptus tereticornis* (Forest Red Gum)
- 8 x *Corymbia maculata* (Spotted Gum)
- 7 x *Eucalyptus microcorys* (Tallowwood)
- 5 x *Eucalyptus paniculata* (Grey Ironbark)
- 2 x *Eucalyptus resinifera* (Red Mahogany)
- 3 x *Eucalyptus saligna* (Sydney Blue Gum)

The design of the Proposal has been tailored to minimise removal of Koala preferred feed trees, and as such the proposal is considered to be consistent with criteria in the PSC CKPoM on the condition that the recommendations outlined within MJD 2023 are followed.

This includes:

- Planting a total of 26 compensatory Koala feed trees of species including; *C. maculata*, *E. tereticornis*, *E. microcorys*, *E. paniculata*, *E. resinifera*, and *E. saligna* in appropriate locations within the study area. These locations include but are not limited to; areas lacking canopy trees or with minimal canopy connectivity. Based on the advice from Council's Natural Systems Environmental Planner, an opportunity exists to reduce the offset planting number in exchange for the planting advanced trees at a 1:1 ratio, with advanced trees having a minimum pot size of 45 litres and being taller than 1.2m at the time of planting.
- A further allocation of trees – which will be 45L mature stock – will be planted within the study area as compensation for the three (3) High Biodiversity value *C. maculata* that will be impacted at a planting ratio of 5:1 – due to size and value – as Swift Parrot feed trees (see **Attachment 5**).
- Three of the trees included in the impact area requiring offset through compensatory planting are included in both the Koala offset via the PSC CKPoM and the Swift Parrot offset via the PSC Tree Technical Specification. A conservative approach has been taken with regard to those trees and they have been offset at the higher ratio as per the PSC Tree Technical Specification.
- Therefore, a total of 38 45L mature stock trees are required to meet the two allocations of trees *as per the PSC CKPoM and the PSC Tree Technical Specification*.

Swift Parrot Offset

The Proposal will impact 0.20 ha of potential Swift Parrot (*Lathamus discolor*) habitat. It should be noted that OEH Bionet records exist on the Site for the Swift Parrot and consideration has been given to minimising the direct and indirect impacts on the species by the Proposal. MJD 2023 determined the proposal is unlikely to have a significant impact on the species. We advise that the compensatory plantings not necessarily be the same species as the trees that are removed given the limited capacity for the Site to support koalas. Instead, we advise that the additional plantings demonstrate a level of consideration to local biodiversity more likely to interact with the Site, such as assisting highly mobile species (e.g., Swift Parrot, Grey-headed Flying Fox and Little Lorikeet).

Three trees within the impact area require offsetting as outlined within the original assessment. Following alterations to the carpark design, compensatory plantings have been increased from 31 to 38 trees.

Revised Mapping and Plans

Please refer to **Attachment 1-5** of this Addendum for a revised set of Figures 1 to Figure 5 from MJD 2023. Note the figures reflect the modified project boundary, previous content generally remains unchanged save the alterations to accommodate the new carpark design.

Summary

This Addendum letter has considered the alteration to the carpark design and the potential for the additional impact areas to result in a significant impact to threatened species, populations or ecological communities. The assessment concluded that the Proposal – inclusive of the alterations to the carpark design – is unlikely to have a significant impact under the Port Stephens Council Comprehensive Koala Plan of Management, *NSW Biodiversity Conservation Act 2016* or the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

Considering the location of the carpark and entrance to the school within the greater Site context, the increase in parking bays provided as per the current carpark design, provides a best case scenario for

both the avoidance and minimisation of impacts to biodiversity and the provision of additional parking bays for the Proposal.

We trust this is sufficient for your purposes, however, should you require any further information or clarification, please do not hesitate to contact Stephanie Sheehy (Field Ecologist) or the writer.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Ross Duncan', written in a cursive style.





Ross Duncan
Senior Environmental Consultant
MJD Environmental

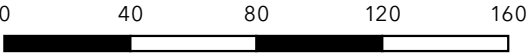
Encl: **Figure 1 – Site Location**
 Figure 2 – Survey Location
 Figure 3 – Vegetation Map
 Figure 4 – Koala Feed Tree
 Figure 5 – Proposed Replacement Koala Feed Tree Locations



FIGURE 1:
SITE LOCATION

Legend

-  Cadastral Boundary
-  Site Boundary
-  Study Area
-  Subject Land



Metres
1:2400



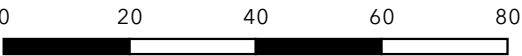
Aerial: Nearmap (2022) | Data: MJD Environmental, EJE, Terras (2023), NSW Spatial Services (2022) | CRS: GDA94 / MGA zone 56 | Date: 28-09-2023 | Version: 3 | Z:\22057 - Hunter River HS & Irrawang HS | This plan should not be relied upon for critical design dimension.



FIGURE 2:
SURVEY EFFORTS

Legend

- Cadastral Boundary
- Site Boundary
- Study Area
- Subject Land
- Survey Transect



Metres
1:1200



Aerial: Nearmap (2022) | Data: MJD Environmental, EJE, Terras (2023), NSW Spatial Services (2022) | CRS: GDA94 / MGA zone 56 | Date: 28-09-2023 | Version: 3 | Z:\22057 - Hunter River HS & Irrawang HS | This plan should not be relied upon for critical design dimension.



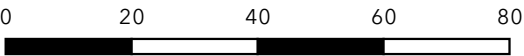
FIGURE 3:
VEGETATION

Legend

- Cadastral Boundary
- Site Boundary
- Study Area
- Subject Land

Vegetation Zones

- VZ1 - 1592_Remnant
- VZ2 - 1592_Planted
- VZ3 - Endemic Planted and Naturalis
- VZ3 - Endemic Planted and Naturalised Planted Vegetation



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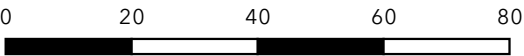
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FIGURE 4:
KOALA FEED TREES

Legend

- Cadastral Boundary
- Site Boundary
- Study Area
- Subject Land
- Koala SAT



Metres
1:1200

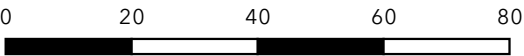


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FIGURE 5:
PROPOSED REPLACEMENT
KOALA FEED TREE
LOCATIONS

Legend

- Site Boundary
- Study Area
- Subject Land
- Cadastral Boundary
- Proposed Planting



Metres
1:1200



Aerial: Nearmap (2022) | Data: MJD Environmental, EJE, Terras (2023), NSW Spatial Services (2022) | CRS: GDA94 / MGA zone 56 | Date: 06-10-2023 | Version: 4 | Z:\22057 - Hunter River HS & Irrawang HS | This plan should not be relied upon for critical design dimension.