Koala Assessment Report

369 Jacks Corner Road, Kangaroo Valley

Report prepared by Narla Environmental Pty Ltd

For The Scots College, Glengarry

September 2025

NARLA
environmental

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Report Certification

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Acronym/ Term	Definition
BC Act	New South Wales Biodiversity Conservation Act 2016.
Core Koala habitat	(a) an area of land which has been assessed by a suitably qualified and experienced person as being highly suitable koala habitat, and where koalas are recorded as being present at the time of assessment of the land as highly suitable koala habitat, or (b) An area of land which has been assessed by a suitably qualified and experienced person as being highly suitable koala habitat and where koalas have been recorded as being present in the previous 18 years.
DA	Development Application.
DPE	New South Wales Department of Planning and Environment (now NDCCEEW)
DPIE	New South Wales Department of Planning, Industry and Environment (now NDCCEEW)
EP&A Act	Environmental Planning & Assessment Act 1979.
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999.
Highly Suitable Koala Habitat	Where 15% or greater of the total number of trees within any Plant Community Type (PCT) are the regionally relevant species of those listed in Schedule 3 of the SEPP.
Impact Area	The area that is likely to be impacted by the planning proposal.
KAR	Koala Assessment Report
KMA	Koala Management Area. These are the regions listed in the Schedules of the SEPP and were derived from the Koala Tree Species Index as part of the Koala Habitat Information Base. Sometimes also referred to as Koala Modelling Region (KMR).
KPoM	Koala Plan of Management.
LGA	Local Government Area.
LLS Act	Local Land Services Act 2013.
NDCCEEW	NSW Department of Climate Change, Energy, The Environment and Water
Site Area	Includes both the impact area and the surrounding areas within the Subject Property. The controls within the SEPP apply to both direct and indirect impacts and all potential habitats on the Site Area; therefore, needs to be considered even if no vegetation is to be cleared.
Subject Property	369 Jacks Corner Road, Kangaroo Valley (Lot27/-/DP881838)
Suitably qualified and experienced person	Suitably qualified and experienced person means a person who has— (a) a tertiary qualification in ecology, environmental management, forestry, or other equivalent qualifications, and (b) experience in flora and fauna identification, survey, and management, including experience in conducting Koala surveys following the techniques specified in the Guideline.

1. Introduction

1.1 State Environmental Planning Policy (Biodiversity and Conservation) 2021: Chapter 4

Chapter 4 of the State Environmental Planning Policy (Biodiversity and Conservation) 2021 (the SEPP) aims to encourage the conservation and management of areas of natural vegetation that provide habitat for koalas to support a permanent free-living population over their present range and reverse the current trend of koala population decline. The SEPP is made under the Environmental Planning and Assessment Act 1979 (EP&A Act) and in part replaces the previous State Environmental Planning Policy (Koala Habitat Protection) 2021.

The aim of the policy will be achieved by:

- Defining what constitutes core Koala habitat
- Outlining the circumstances where a consent authority must have regard to the matters set out in the guideline
- Encouraging the development of Koala Plans of Management (KPoMs). These plans provide the best opportunity to deliver strategic conservation outcomes for Koala populations in NSW. They play a critical role in helping to understand Koala values at a landscape scale and avoiding the types of issues that can arise through site-based, incremental impacts, such as the loss of important habitat linkages, or intensifying land use within areas that are likely to lead to population decline; and
- Requiring that a consent authority's determination of a development application is consistent with a KPoM or Part 4.9 of the SEPP, where there is no KPoM

1.2 Nature of the Development

Narla Environmental Pty Ltd (Narla) was engaged by the Scots College ('the proponent') to undertake a Koala Assessment Report (KAR) to accompany the development application (DA) for the proposed development at 201-369 Jacks Corner Road, Kangaroo Valley NSW 2577 (Lot 27/DP881838; hereafter referred to as the 'Subject Property; **Figure 1, Figure 2, Figure 3**). The first Development Application (DA) will cover the Masterplan, which includes all proposed buildings, landscape, and civil works, with detailed plans for three dormitories as part of Stage 1 (**Appendix I**). This KAR considers the overall impact of the full Masterplan while noting that Stage 1 is the initial focus. All areas associated with the proposed development will be hereafter referred to as the 'Impact Area'(i.e. direct impacts) and the 'Site Area' (indirect impacts) (**Figure 1, Figure 2, Figure 3**).

Narla has produced this report to assess any potential impacts associated with the proposed development on Koalas and/or Koala habitat. The report will focus on appropriate measures to mitigate any potential impacts in line with Chapter 4 of the SEPP.

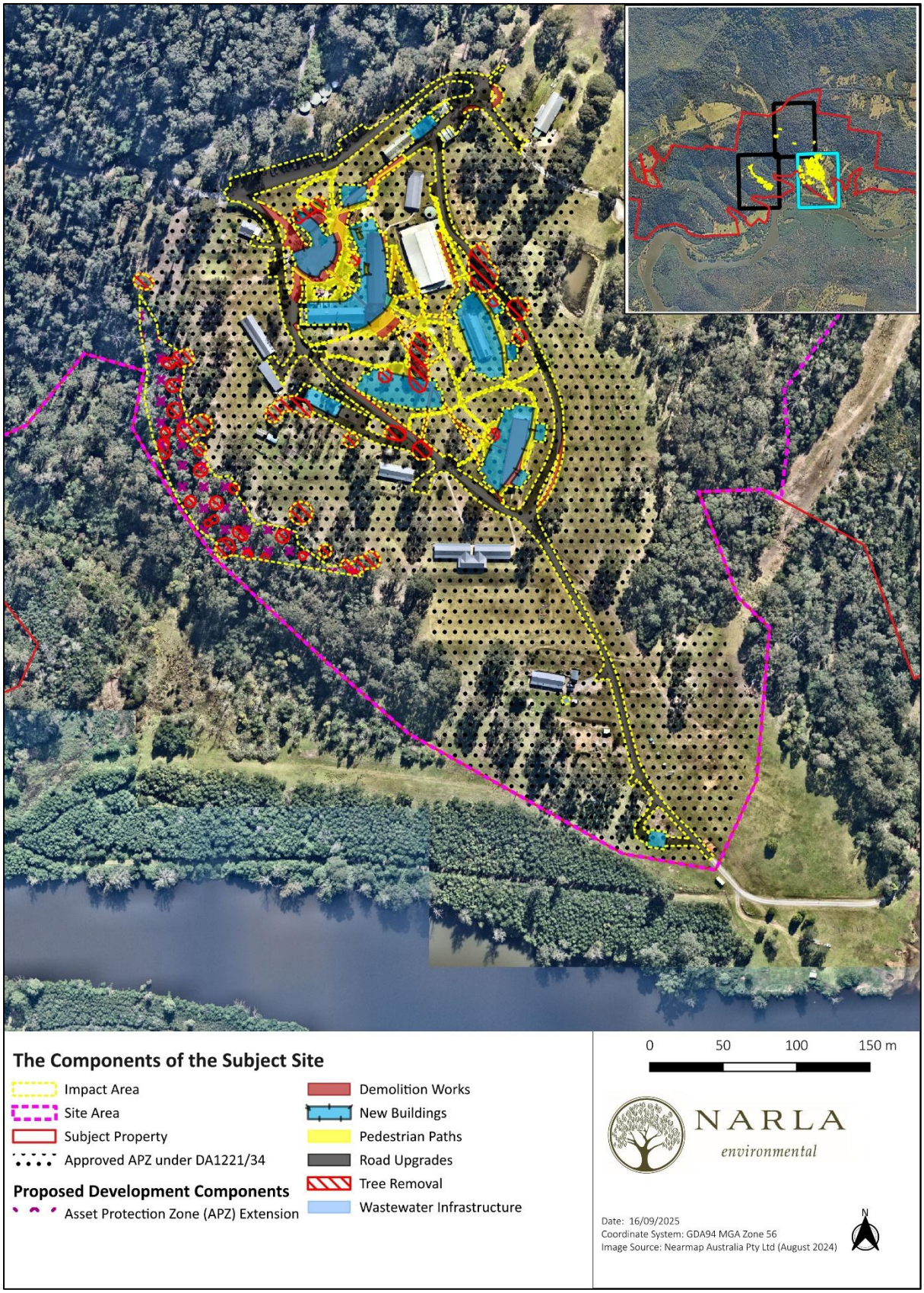

Figure 1. Components of the Impact Area.

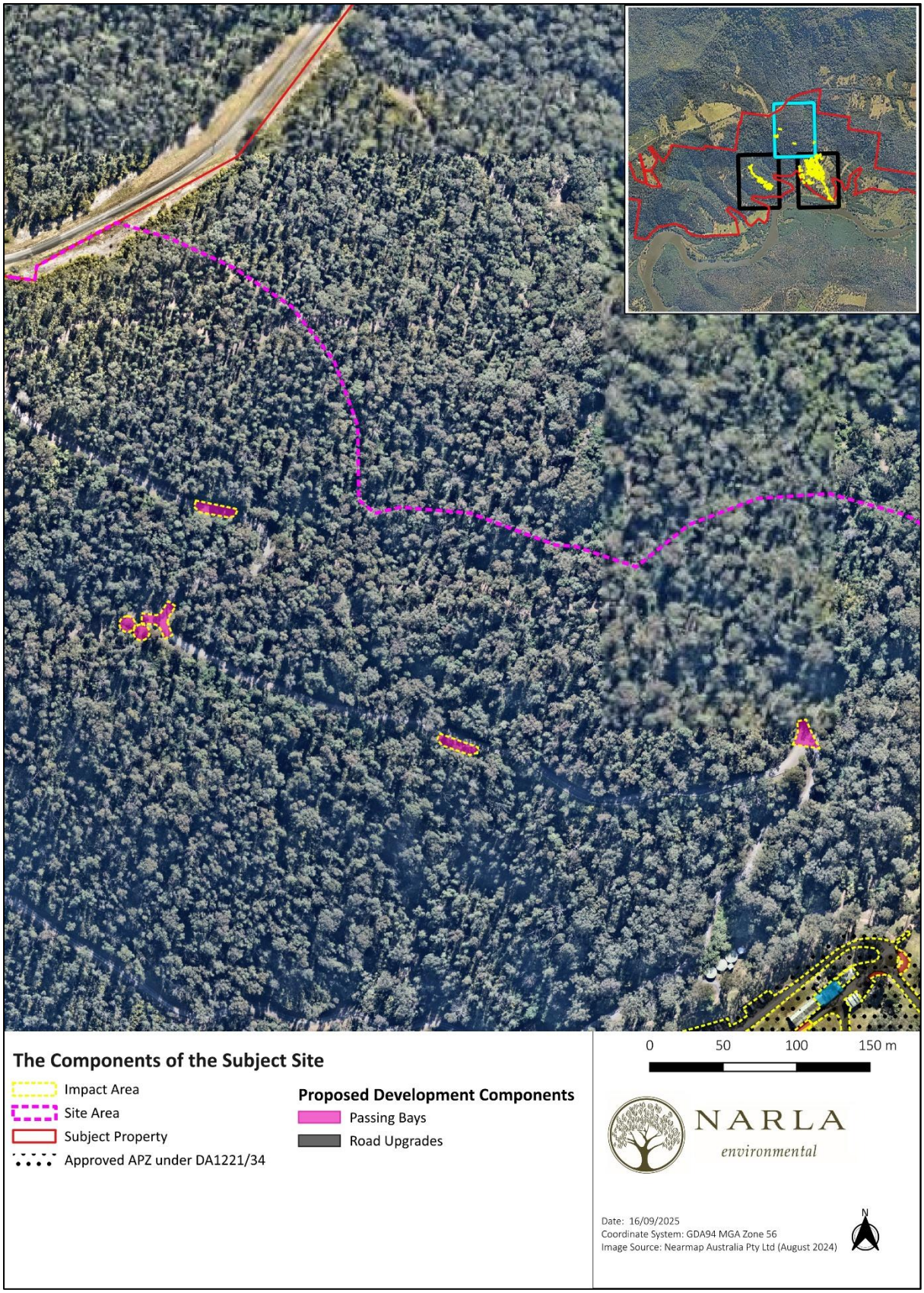

Figure 2. Components of the Impact Area.

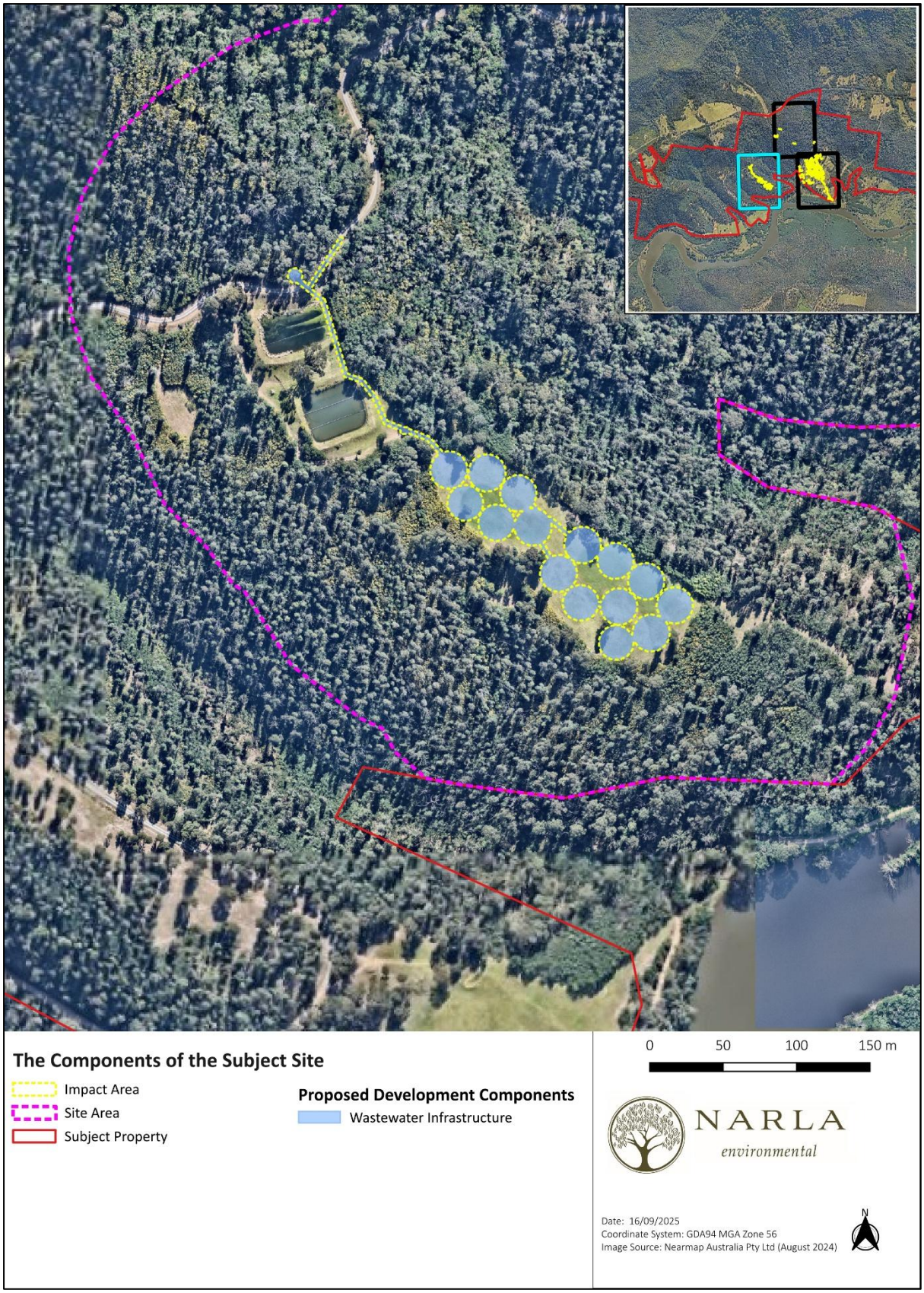

Figure 3. Components of the Impact Area.

1.3 How the SEPP applies to the Proposed Development

- The policy applies to each local government area listed in Schedule 2 of the SEPP:
    - The City of Shoalhaven LGA is listed in Schedule 2 of the SEPP
- The Koala Management Area (KMA) Specified in Schedule 2 of the SEPP:
    - The City of Shoalhaven LGA is under both the Central and Southern Tablelands and South Coast KMA
- The Site Area is not:
    - Land dedicated or reserved under the National Parks and Wildlife Act 1974 or acquired under Part 11 of that Act
    - Land dedicated under the Forestry Act 2012 as a State Forest or a flora reserve; or
    - Land on which biodiversity certification has been conferred, and is in force, under Part 8 of the Biodiversity Conservation Act 2016
- The policy further applies to the land if the land:
    - Has an area of at least one hectare:
        - The Subject Property is approximately 279.34 ha.
    - Does not have an approved koala plan of management applying to the land:
        - The Subject Property does not have an approved koala plan of management.

1.4 Proposals Impacting Koalas and/or Habitat

Proposals that are likely to impact Koalas and/or Koala habitat must address the criteria under each of the seven planning principles, as defined below:

Principle 1. Understand Koala habitat values	
Criteria 1.	The site is established as containing core koala habitat if a site area survey undertaken by a suitably qualified and experienced person has identified the presence of core koala habitat.
Criteria 2.	Further analysis is undertaken to understand the broader values of the core Koala habitat, including information about the Koala population using the habitat and any specific ecological functions the habitat might serve. Key questions which need to be addressed in meeting this criterion include: ▪ What is known about the size, health, and viability of the Koala population? ▪ What is known about the generational persistence of the local Koala populations through an analysis of records to determine population trends and persistence over time? ▪ What is the broader landscape context of the habitat within the Site Area? For instance, is it contiguous with broader areas of habitat or relatively isolated, and what are the likely regional movement patterns of Koalas using the Site Area? ▪ Does the Site Area contain values that are likely to serve an important ecological function for Koalas? For instance, providing linkage between other habitats, or serving as a habitat buffer to broader areas? ▪ Could the habitat area and/or Koala population using the Site Area be important to the recovery of the Koala? For instance, does the habitat contain features that might provide refuge during droughts, extreme heat, or fire? Or is the population considered to be healthy, robust, or showing relatively low incidence of disease? ▪ Drawing on evidence presented, what significance are the values of the site to preserving the existing Koala population and supporting recovering and expanding populations?
Principle 2. Avoid intensifying land use in Koala habitat areas through appropriate landscape planning and site selection	
Criteria 3.	Site selection takes into account Koala habitat values. In addressing this criterion, the development application needs to show: ▪ How has the development footprint avoided habitat? ▪ What feasible alternatives were assessed as part of the process?
Principle 3. Encourage the proper conservation and management of areas of natural vegetation that provide habitat for Koalas	
Criteria 4.	Development avoids the direct loss of Koala habitat within the Site Area and avoids fragmentation.
Criteria 5.	Koala habitat is excluded from the development footprint.
Principle 4. Minimise potential direct impacts to Koalas through Koala sensitive design	
Criteria 6.	Development avoids direct impacts to Koala habitat within the Site Area. In addressing this criterion, the development application needs to show: ▪ How will impacts to Koala habitat be minimised so as to not fragment existing Koala habitat, impact the ability of Koalas to move across the landscape or impact the recovery and expansion of populations?
Criteria 7.	Where some loss of habitat cannot be avoided (and providing it is consistent with all other criteria set out here), development is designed in a way that retains higher value areas across the site and avoids fragmentation of habitat within the Site Area and more broadly within the region. For instance, this might mean prioritising the retention of koala trees with a diameter at breast height over bark (DBHOB) greater than 250 mm, or areas of core koala habitat that are in better

	condition, show signs of koala tree growth, are better connected with habitat more broadly, or contain features that might be important for refuge. Note: a "tree" is taken to be a plant with a DBHOB of 10 cm or greater.
Criteria 8.	Development is undertaken in a way that maintains the potential function of the core koala habitat. For instance, if the koala habitat within the site area has been identified as an important linkage corridor, development should be undertaken in a way that enables the continued movement of koalas.
Principle 5. Implement best practice measures for the management of identified risks to Koalas.	
Criteria 9.	All relevant indirect impacts to Koalas and Koala habitat associated with the development are identified. Potential indirect impacts which may be relevant include (but are not limited to): dog attacks, vehicle strikes, drowning in pools, increased risk of fire, introduction or spread of disease, disturbance, and impediments to movement.
Criteria 10.	Development uses best practice management measures to address the potential impacts considered likely to pose an increased risk to Koalas or their habitat. The types of measures or controls used to address impacts will vary depending on the nature of the development, the relative importance of the Site Area to Koalas, and the extent and magnitude of impacts. The specific requirements may be guided by development control plans relevant to each council area.
Principle 6. Use compensatory measures only where they can be shown to better promote the aim of the SEPP	
Criteria 11.	Compensatory measures are only used once it has been demonstrated that options to avoid, minimise and manage impacts to Koala habitat have been exhausted.
Criteria 12.	Where there is any direct loss of habitat or compromise in the potential function of a koala habitat area (and providing it is consistent with all other criteria outlined here), suitable compensatory measures are provided. Determining the suitability of any proposed compensatory measures should be guided by the overall aim of the SEPP.
Principle 7. Use adaptive management strategies to monitor, evaluate and deliver appropriate planning outcomes for Koalas	
Criteria 13.	Development application includes a monitoring, adaptive management, and reporting component against the key outcomes.

2. Koala Habitat Values

2.1 Site Description and Location

The Subject Property is located on Jacks Corner Road, Kangaroo Valley within the Shoalhaven City Council Local Government Area (LGA), covering an area of approximately 275.12ha. The Subject Property includes native remnant bushland and a central area with partially cleared land, buildings, and roadways associated with the current educational and recreational use of the site. The property is surrounded by similar bushland properties and acreages typical of the area. The Impact Area comprises a total area of approximately 4.5ha (**Figure 1, Figure 2, Figure 3**).

2.2 Koala Habitat Survey

Suitable Koala Habitat:

- Any PCT that is:
    - Associated with the koala in the TBDC; and
    - With a minimum of one kola use tree present, for the relevant region

The Site Area was assessed by Brodie Miller on the 16th April 2025. During the assessment, it was determined that the Site Area comprises four (4) native vegetation communities:

- PCT 3266: Nattai-Morton Sandstone Peppermint Gully Forest
- PCT 3267: Shoalhaven Foothills Turpentine Forest
- PCT 3447: Shoalhaven Foothills Spotted Gum Forest
- PCT 3654: Shoalhaven Lowland Bloodwood Shrub Forest

Narla and Gummifera (2025) identified the following koala use trees within the Site Area:

- *Corymbia gummifera*
- *Corymbia maculata*
- *Eucalyptus amplifolia*
- *Eucalyptus eugenioides*
- *Eucalyptus globoidea*
- *Eucalyptus obliqua*
- *Eucalyptus paniculata*
- *Eucalyptus piperita*
- *Eucalyptus punctata*
- *Eucalyptus sideroxylon*
- *Eucalyptus pilularis*

The presence of these species, which are listed as koala use trees under both Central and Southern Tablelands and South Coast KMA, confirms that the Site Area meets the definition of Suitable Koala Habitat as outlined in the guidelines (DPE 2022).

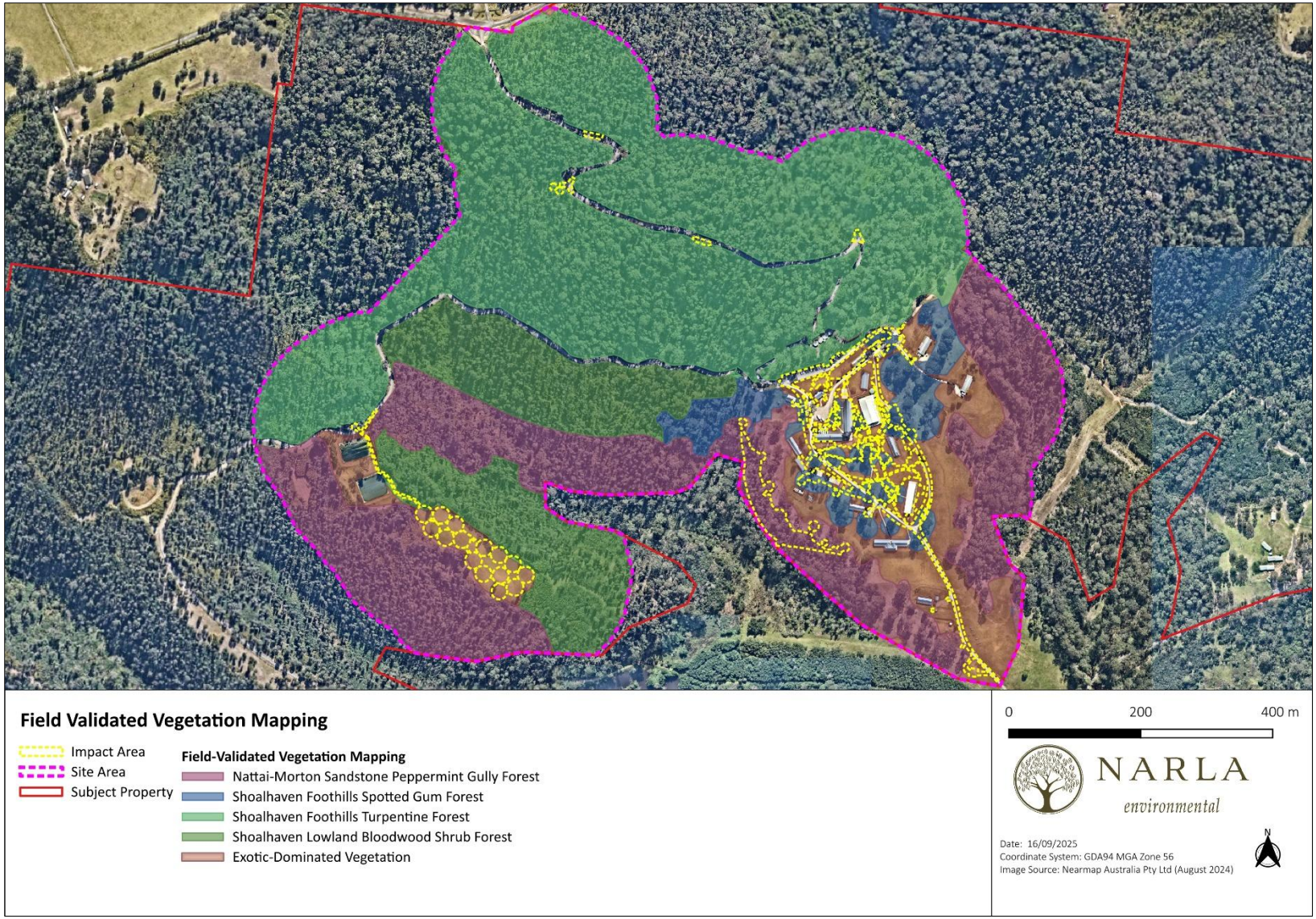

Figure 4. Habitat for Koalas within the Site Area.

Figure 5. Koala use trees identified within the school grounds (Gummifera, 2025).

Figure 6. Scratch mark trees identified within the school grounds.

2.3 Koala Habitat Values

Shoalhaven Council has confirmed that vegetation within the Subject Property meets the definition of core Koala habitat under cl. 4.2 of the BC SEPP, due to the presence of highly suitable habitat and recent records of Koala. The Site Area is part of a larger matrix of native bushland and semi-rural landholdings that collectively support Koala movement and resource use. Koala records within both the Subject Property and the surrounding landscape (Figure 4) demonstrate ongoing use of the locality.

The Impact Area is located along disturbed edges of larger habitat patches. While mapped as core habitat, these edge areas are more likely to function as transit and resting sites rather than as critical foraging or breeding areas. Central areas of the Subject Property contain higher-quality habitat that will remain intact and continue to provide more significant ecological functions. The development footprint has been deliberately aligned with existing disturbed features (roads, driveways, and cleared areas) to minimise fragmentation and avoid intrusion into higher-value habitat.

Surveys conducted by Gummifera (2025) identified 223 Koala use feed trees within the school grounds. Of these, 61 will be removed, primarily due to APZ establishment requirements (Figure 5). Two trees within the footprint displayed scratch marks; however, these could not be conclusively attributed to Koalas. Confirmed activity trees, including those with verified Koala scratch marks, are located outside the impact footprint and will be retained (Figure 6). These trees have been mapped to ensure their ongoing protection.

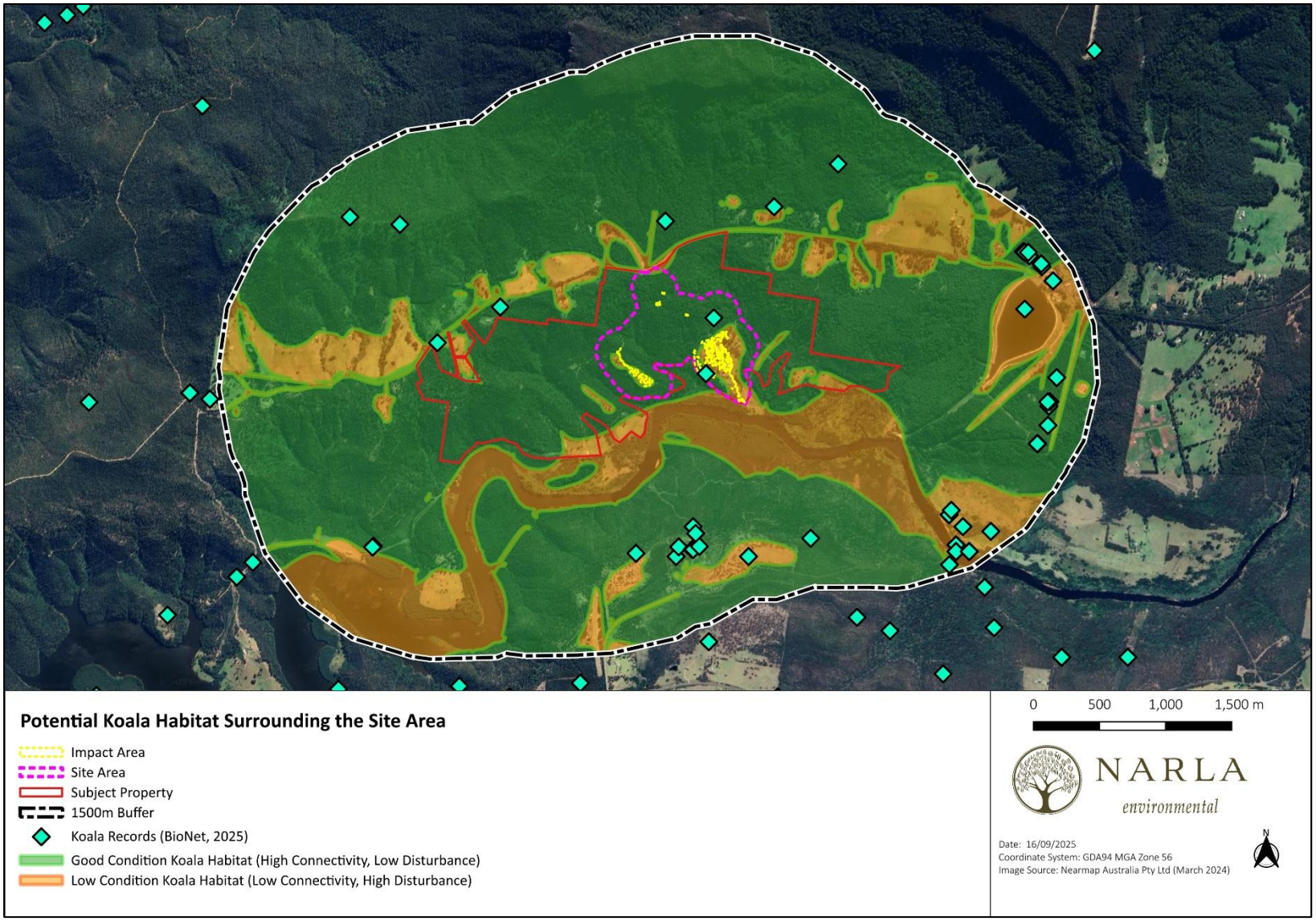

Figure 7. Potential Koala habitat and records within the vicinity of the Site Area.

3. Avoiding Impacts to Koalas

3.1 Site Selection and Minimising Direct Impacts to Koalas

Complete avoidance of impacts was not feasible due to bushfire protection requirements, particularly the establishment of an APZ. Nevertheless, the design of the development has been strategically guided to minimise both the scale and ecological significance of habitat loss.

Avoidance measures include:

- Siting the development footprint adjacent to existing disturbed features, including driveways and previously cleared areas, to reduce intrusion into intact core habitat.
- Retaining all confirmed Koala activity trees (scratch-marked) that are located outside the impact footprint.
- Locating infrastructure so that removal of large, mature Koala use feed trees is avoided where possible.
- Restricting temporary construction areas and laydown zones to within the defined footprint, preventing unnecessary disturbance.

Minimisation measures include:

- Designing the APZ along disturbed edges to reduce new fragmentation.
- Commissioning a targeted pre-clearance survey by a licensed ecologist prior to vegetation removal to confirm Koala absence and allow safe relocation of any individuals present.
- Implementing staged clearing under ecological supervision to provide opportunity for Koalas to disperse naturally.
- Installing temporary exclusion fencing around retained habitat to prevent Koalas from entering the works area.

4. Potential impacts

4.1 Residual Impacts

The proposed development will result in the removal of 0.84 ha of core Koala habitat, representing approximately 0.31% of the 270 ha available within the Subject Property. The vegetation to be removed occurs along the periphery of larger patches, and higher-quality central habitat will be retained.

Of the 223 Koala use feed trees identified by Gummifera (2025), 61 are proposed for removal, mostly due to mandatory APZ establishment (Figure 5). Two of these trees displayed scratch marks and occur within the impact footprint; these will be removed, although the scratches cannot be conclusively attributed to Koalas. Other trees with scratch marks occur outside the impact footprint and will be retained (Figure 6).

The loss of these trees will be offset through supplementary planting at a 1:2 ratio, equating to 122 replacement Koala use feed trees. The residual impact is therefore limited to a small proportion of the available habitat and does not include the loss of large, central foraging or breeding resources. Connectivity will remain intact across the Subject Property and surrounding lands, supporting Koala movement. For these reasons, the residual impacts are unlikely to compromise the viability of the local Koala population.

4.2 Indirect Impacts

Potential indirect impacts associated with the development include:

- Vehicle strike: Construction traffic and operational use of roads could increase collision risk.
- Edge effects: Creation of APZ edges may increase wind, light, and noise penetration into retained habitat.
- Behavioural disturbance: Noise, lighting, and human activity during construction may temporarily disturb Koalas.
- Predation risk: Domestic dogs associated with the school campus have potential to impact Koalas.

With the mitigation measures implemented as per **Section 5.1**, indirect impacts are expected to be minor, highly localised, and not reduce the viability of the local Koala population.

5. Plan to Manage and Protect Koalas and their Habitat

5.1 Management Measures

A description of the management measures that will be implemented as part of the proposed construction and operations to manage the direct and indirect impacts is presented in **Table 1**.

Table 1. Management measures, outcomes, and performance targets for impacts to Koalas.

Action	Management Outcome	Performance Target
Assigning a Project Ecologist for vegetation clearing	A suitably qualified and licensed Ecologist (minimum tertiary degree, ≥3 years' experience, NSW Scientific Licence, DPI Animal Research Authority) will be engaged prior to works. The Ecologist will: ▪ Undertake a pre-clearing survey to identify habitat trees and trees with scratch marks to be retained or removed. ▪ Supervise staged clearance of vegetation. ▪ Relocate any Koalas encountered under licence. ▪ Maintain records of Koala activity and provide reports to Council and DCCEEW.	No Koalas injured or killed during clearing. All survey and relocation records provided. Compliance with licensing conditions.
Tree protections	Establish Tree Protection Zones (TPZs) around all retained Koala use trees in accordance with AS 4970-2009. Fencing and signage will prevent machinery access and stockpiling.	100% of trees outside the approved Impact Area protected. No unauthorised encroachment into TPZs.
Management of trees with scratch marks	Where feasible, trees with scratch marks will be retained. Where not possible due to APZ or footprint requirements, removal will be offset at a 1:2 planting ratio. These trees will be prioritised for monitoring during pre-clearance and clearing.	Retention of all trees with scratch marks outside the footprint. All removed trees offset at 1:2 planting ratio.
Erection of temporary Koala exclusion fencing	Temporary exclusion fencing will be installed around retained vegetation and habitat corridors to prevent Koalas from entering the active construction area. Fencing will be inspected daily during works.	Zero Koalas detected within the construction footprint. Fencing intact and functional throughout construction.
Pre-clearance survey immediately prior to works	A targeted survey will be conducted 24–48 hours before vegetation removal to detect Koalas. Any individuals present will be allowed to disperse naturally or relocated under licence by the Project Ecologist.	Written confirmation provided that no Koalas remained in the clearing area prior to removal.
Staged clearing	Vegetation removal will occur in stages, starting with lower-value habitat, under direct ecological supervision. This allows Koalas to move into retained habitat prior to the removal of higher-value trees.	No Koalas displaced without dispersal opportunity. Staged clearing recorded in daily site diaries.
Traffic management	Implement vehicle speed restrictions (<20 km/h on access roads), restrict heavy vehicle movements at dawn/dusk, and brief all staff and contractors on Koala safety. Signage installed along access roads.	Zero Koala vehicle strikes during construction. 100% of staff and contractors inducted.

Action	Management Outcome	Performance Target
Noise and light controls	Restrict construction to daylight hours where possible. Use directional, shielded lighting aimed away from retained habitat. Limit night works to essential activities only.	No evidence of Koala avoidance or behavioural disturbance linked to construction noise/light. Lighting shielded in all work zones.
Dog management	Domestic dogs associated with the school campus will be confined to secure enclosures. Access to retained bushland and construction areas will be restricted through fencing and signage.	No Koala injuries or deaths from dog predation. 100% compliance with confinement requirements.
Supplementary planting (1:2 ratio)	Plant a minimum of 122 Koala feed trees to offset the removal of 61 feed trees (including those with scratch marks). Species will include locally occurring Koala feed species.	At least 122 Koala feed trees established. ≥80% survival rate after 2 years. Failed trees replaced annually until canopy closure achieved.
Monitoring and reporting	Annual monitoring of Koala activity in retained habitat, condition of planted offsets, and overall site use. Records of Koala sightings submitted to Council and BioNet. Annual reports prepared by a suitably qualified Ecologist.	Annual reports submitted on time. Evidence of Koala use maintained or increased over baseline. Offset planting survival and growth rates documented.

5.2 Compensatory Measures

To offset the unavoidable removal of 61 Koala use feed trees, supplementary planting will occur at a ratio of 1:2 (removed:planted), equating to at least 122 replacement trees.

Planting will prioritise Koala use species native to the Shoalhaven Koala Management Area, including:

- *Corymbia gummifera*
- *Corymbia maculata*
- *Eucalyptus amplifolia*
- *Eucalyptus eugenioides*
- *Eucalyptus globoidea*
- *Eucalyptus obliqua*
- *Eucalyptus paniculata*
- *Eucalyptus piperita*
- *Eucalyptus punctata*
- *Eucalyptus sideroxylon*
- *Eucalyptus pilularis*

These plantings will be located to strengthen existing habitat corridors and enhance long-term foraging opportunities and resilience of retained habitat.

All plantings will be subject to a maintenance program (watering, weed control, replacement of losses) until canopy closure is achieved. This program ensures that compensatory measures provide a genuine net gain in Koala habitat values.

5.3 Monitoring Plan and Adaptive Management

To measure the success of this plan, it is crucial to monitor for Koalas and their habitat regularly and consistently. Now that suitable Koala habitat has been determined to exist within the Site Area, it is crucial to monitor its condition in the long term. Table 2 details monitoring activities that are to be undertaken within the Site Area to track Koalas and changes to their habitat. The overall performance criteria are focussed on achieving a net gain in core Koala habitat by replanting of Koala feed trees and removal of weeds.

Table 2. Monitoring schedule for Koalas and Koala habitat within the Site Area.

Monitoring activity	Purpose	Timing and Frequency	Responsibility
Record all Koala sightings (live animals, vocalisations, scats, scratch marks) within the Site Area. Submit data to Shoalhaven Council and NSW DCCEEW.	Maintain accurate and up-to-date records of Koala presence and use of the Site Area.	Ongoing, with immediate reporting of sightings.	Proponent / Project Ecologist
Conduct systematic Koala activity assessments (scat surveys, spotlighting, diurnal searches) in retained habitat and planted offsets.	Detect changes in Koala use of retained and compensatory habitat over time.	Annually following commencement of works.	Project Ecologist
Monitor Koala exclusion fencing and Tree Protection Zones for integrity and function.	Ensure fencing prevents Koala entry into construction areas and TPZs remain effective.	Weekly during construction and after major weather events.	Contractor / Project Ecologist
Record and investigate any incidents of Koala vehicle strike on access roads associated with the development.	Confirm effectiveness of traffic management measures.	Ongoing during construction. Incident reports lodged within 24 hrs.	Contractor / Proponent

An active adaptive management approach is recommended wherever there is high uncertainty in the system under management. This uncertainty may be related:

- To the basic ecology of the system (i.e. what are the important environmental drivers, what are the dynamics of processes like competition and predation)
- The relative effectiveness of different threat-abatement techniques (e.g. Mechanical versus chemical weed control); and
- The effects of threat-abatement on the focal species or ecosystems

The most appropriate monitoring regime is a single management approach (as detailed in this report) based on the best available information, monitoring the outcomes of that approach, and evaluating those outcomes carefully to inform adaptive changes.

5.4 Reporting Requirements

A report should be produced annually from the commencement of construction that provides a detailed account of the changes to the Koala habitat within the Site Area. This report will summarise:

- The loss or increase in the Koala habitat
- Any revegetation works
- Records of any Koala sightings
- Any management issues/recommendations required to meet performance targets
- Findings from Koala surveys, and
- Findings from any additional assessments

Photographic evidence should be produced to illustrate progress of habitat management and native regeneration. The report is to be prepared by a suitably qualified Project Ecologist.

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