

# **Built**

## **APPENDIX H - Biodiversity Management Sub-Plan**



Wee Waa High School

Construction Biodiversity Management Sub-Plan

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**Built Pty Ltd c/- School Infrastructure NSW**

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## DOCUMENT TRACKING

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Template 2.8.1

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## Abbreviations

Term	Meaning
BC Act	NSW <i>Biodiversity Conservation Act 2016</i>
BCS	NSW Department of Planning and Environment’s Biodiversity, Conservation and Science Directorate
BMP	Biodiversity Management Plan (a separate document to be prepared prior to the commencement of operation)
CBMP	Construction Biodiversity Management Sub-Plan (this document)
CEMP	Construction Environmental Management Plan
CWD	Coarse Woody Debris
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DPE	NSW Department of Planning and Environment
EIS	Environmental Impact Statement
ELA	Eco Logical Australia Pty Ltd
EMS	Environmental Management System
EP&A Act	NSW <i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i>
HBT	Hollow-bearing tree
SINSW	School Infrastructure NSW
SSD	State Significant Development

## SSD Conditions of Consent

Condition	Requirements	Section this is addressed
<b>SSD 21854025</b>		
Schedule 2 Condition A2	<p><b>Terms of Consent</b></p> <p><i>Architectural plans prepared by SHAC:</i></p> <ul style="list-style-type: none"> <li>• SSD1103 – Proposed Tree Removal Site Plan</li> </ul> <p><i>Landscape Plan prepared by Moir Landscape Architecture</i></p> <ul style="list-style-type: none"> <li>• LP03 Cultural Landscape</li> </ul>	Refer to relevant documents
Schedule 2 Condition A9	<p><b>Evidence of Consultation</b></p> <p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <ol style="list-style-type: none"> <li>a. Consult with the relevant party prior to submitting the document for information or approval; and</li> <li>b. Provide details of the consultation undertaken including: <ol style="list-style-type: none"> <li>i. The outcome of that consultation, matters resolved and unresolved; and</li> </ol> </li> </ol> <p>Details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>	Appendix A
Schedule 2 Condition B1	<p>Prior to commencement of construction, the relevant architectural and landscape plans referenced in Condition A2 must be amended and approved by the Planning Secretary. The amended plans must comply with the following requirements:</p> <ol style="list-style-type: none"> <li>c. i. include the provision of nest boxes suitable to native fauna likely to use the site</li> </ol>	Section 5.2.2
Schedule 2 Condition B25	<p>The Construction Biodiversity Management Sub-Plan must address, but not be limited to, the following:</p> <ol style="list-style-type: none"> <li>a. be prepared by a suitably qualified and experienced ecologist or bushland regeneration expert;</li> <li>b. be prepared in consultation with EHG. Documentary evidence must be provided on how this feedback has been considered and whether any changes have been made in response to this feedback</li> <li>c. identify areas of land where impacts on biodiversity are to be avoided as outlined in the Biodiversity Development Assessment Report V8, prepared by Ecological Australia and dated 22 August 2022 and set out how these areas will be protected from construction impacts; and</li> <li>d. set out the measures identified in the Biodiversity Development Assessment Report to minimise, mitigate and manage impacts on biodiversity, including but not limited to exclusion fencing, storage of material, timing of implementation of any measures and responsibility for delivery of the measures.</li> </ol>	<p>Section 1.4 Appendix B</p> <p>Appendix A</p> <p>Section 5.1</p> <p>Section 5</p>

# 1. Introduction

The new Wee Waa High School (the Project) will involve the construction of multiple facilities as part of a two-stream high school with a capacity of 200 students, including a new school building, sports facilities, environmental and cultural spaces and ancillary infrastructure, located in the New England region of NSW. State Significant Development Consent (SSD 21854025) under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) was issued for the Project on 12 October 2022 to NSW Department of Education.

## 1.1. Purpose and scope

This Construction Biodiversity Management Sub-Plan (CBMP) has been prepared to fulfil the requirements of Part B, Condition B25 of SSD 21854025. Condition B25 requires the CBMP to include all measures to be undertaken to mitigate impacts to biodiversity detailed in the Biodiversity Development Assessment Report (BDAR) prepared for the Project Environmental Impact Statement (EIS), to ensure the Project is constructed and operated in accordance with the protection of biodiversity values identified and associated offsets.

The scope of the CBMP is for the construction phase of the Project. A separate operational Biodiversity Management Plan (BMP) will be prepared prior to the commencement of operation to fulfil the requirements of Condition D36 of SSD 21854025.

## 1.2. Objectives

This CBMP describes the biodiversity management measures that will be implemented to avoid, minimise, and mitigate impacts associated with the construction and operation of the High School. This CBMP has been written to complement other management plans for the Project and has been developed as a component of, and should be read in conjunction with, the Project Construction Environmental Management Plan (CEMP).

## 1.3. Consultation

Per the requirements of Part B, Condition B25 of SSD 21854025, consultation with the NSW Department of Planning and Environment (DPE) Environment and Heritage Group (EHG) will be undertaken through review of the lodged CEMP and CBMP. **Appendix A** provides a consultation log which will be updated detailing the outcomes of the consultation.

## 1.4. Qualifications of personnel

This CBMP has been prepared by Eco Logical Australia Pty Ltd (ELA). ELA has been assessed and certified as meeting the requirements of the below three standards for the following activities - Environmental Consulting Services and Land Management:

- ISO 9001:2015 Quality Management Systems
- ISO 14001:2015 Environmental Management Systems
- ISO 45001:2018 Occupational Health and Safety Management Systems.

CVs of key personnel are provided in **Appendix B**.





Figure 1: Site location within the Wee Waa Township



## 2. Project overview

The Project is located within the township of Wee Waa, approximately 40 km northeast of Narrabri in the Narrabri Shire Council Local Government Area (LGA).

The Project will involve the construction of a new high school with a capacity of up to approximately 200 students in a series of two-storey buildings, an Indigenous learning centre, sporting fields and associated civil and utilities works, with future capacity for 300 students subject to funding & service need.

The Project is located on vacant land adjacent to the existing Wee Waa Public School and will include:

- Two-storey built forms, fully accessible and equitable, including:
  - General learning spaces & learning support unit
  - Specialist spaces, including art, science, tas, hospitality, performance
  - Indigenous cultural centre
- Associated civil & utilities works
- Sporting fields, & outdoor sports courts
- 40 carparking spaces, bus bays, kiss & drop
- Wayfinding & signage
- Fencing and security.

The Project design has been developed to conform to the natural environment and site opportunities/constraints. The proposal will facilitate the efficient construction of a high-quality design that responds to the strategic need of the High School, whilst providing a high level of amenity to the future students and responding to the surrounding residential context and neighbouring public school.

The site access point on George Street, and staggered arrival schedules have been developed specifically to address road safety and provide adequate mitigation measures to be implemented to reduce impacts to road users and the community.

A full description of the Project is provided with the Environmental Impact Statement (EIS) and subsequent Submissions and Amendment Reports. This information can be accessed on the NSW Planning Portal website: <https://www.planningportal.nsw.gov.au/major-projects/projects/new-wee-waa-high-school>.

## 3. Legislative context

### 3.1. State approval

The Project was issued SSD Development Consent on SSD 21854025 12 October 2022.

### 3.2. Commonwealth

Under the EPBC Act, any action which “has, will have, or is likely to have a significant impact on a matter of Matter of National Environmental Significance (MNES)” may be considered a “controlled action” and require approval from the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW). Impacts to MNES, specifically threatened species and ecological communities, was assessed in the Project BDAR, which concluded there would be no significant impacts. Therefore, the Project was not referred to DCCEEW for assessment.

## 4. Existing environment

### 4.1. Land use

The Project site is currently vacant land and is zoned R1 – General Residential (under Narrabri LEP 2012), characterised by flat, low-lying terrain featuring open grasslands across most of the site. Irregular patches of remnant woodland are present throughout. A constructed drainage line intersects the subject land from the west to east.

### 4.2. Vegetation

A total of 1.66 ha of native vegetation is mapped within the Project site, comprising one Plant Community Types (PCT) stratified into 2 Vegetation Zones based on vegetation condition, detailed below in Table 4-1.

**Table 4-1: Vegetation zones**

Vegetation Zone	Management Zone	PCT ID	PCT Name	Direct impact (ha)
1	-	40	Coolibah open woodland wetland with chenopod/grassy ground cover on grey and brown clay floodplains	0.63
2	A	40	Coolibah open woodland wetland with chenopod/grassy ground cover on grey and brown clay floodplains	0.87
	B (to be managed)	40	Coolibah open woodland wetland with chenopod/grassy ground cover on grey and brown clay floodplains	0.16
<b>Total native vegetation</b>				<b>1.66</b>

#### 4.2.1. Threatened Ecological Communities

All areas of PCT 40 conform to the 'Coolibah-Black Box Woodland in the Darling Riverine Plains, Brigalow Belt South, Cobar Penneplain and Mulga Lands Bioregions' Endangered Ecological Community listed under the NSW *Biodiversity Conservation Act 2016* (BC Act) and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

#### 4.2.2. Threatened flora

The impact area has been subject to threatened flora surveys targeting a range of species, however, surveys within the appropriate seasonal survey timing for some species was not possible. As such, four (4) threatened flora species have been identified as having the potential to occur within the Project site due to the presence of potential, although marginal, habitat:

- *Desmodium campylocaulon* (Creeping Tick-trefoil)
- *Digitaria porrecta* (Finger Panic Grass)
- *Homopholis belsonii* (Belson's Panic)
- *Lepidium monoplacoides* (Winged Peppergrass).

#### 4.2.3. Weeds

Three (3) State and/or regional priority weeds listed under the *North West Regional Strategic Weed Management Plan 2017 – 2022* have been recorded within the Project site, which are also Weeds of National Significance, listed below in Table 4-2. The Project site is consistent with the regional landscape and contains a variety of exotic species which may be considered environmental and / or agricultural weeds and will require management.

**Table 4-2: Priority weeds recorded in the Project site**

Scientific name	Common name	Regional Weed (Northern Tablelands)	Priority (Northern)	Weeds of National Significance (WONS)
<i>Eragrostis curvula</i>	African Lovegrass	Y	Y	Y
<i>Lycium ferocissimum</i>	African Boxthorn	Y	Y	Y
<i>Parthenium hysterophorus</i>	Parthenium Weed*	Y	Y	Y

\*Listed in the North West Regional Strategic Weed Management document as requiring eradication. Local Land Services have been notified.

### 4.3. Fauna and Habitat

#### 4.3.1. Fauna habitat

Fauna habitat within the impact area includes grassland, grassy woodland and forest in varying condition, hollow bearing trees, dense grass and cracking soils. The vegetation that occurs exists as an isolated patch and provides no habitat connectivity to areas outside the identified patch.

##### 4.3.1.1. Vegetation

Vegetation varies from low to moderate condition within the impact area and contains seasonal flower resources, trees with hollows and fallen timber. In general, vegetation comprises patches of sparse mid-storey and areas of no canopy, and the groundcover interspersed with shrubs, native and exotic groundcover in the form of native grasses and forbs and other significant habitat features. Scattered throughout are medium to large trees, with some containing small-medium (<5-10 cm) hollows.

#### 4.3.1.2. Key Fish Habitat

The development site does not involve impacts to Key Fish Habitat, nor does the Project involve harm to marine vegetation, dredging, reclamation or obstruction of fish passage.

#### 4.3.1.3. Cleared/highly disturbed non-native vegetation

There is no non-native vegetation present within the Project Site.

#### 4.3.2. Threatened and migratory fauna

Threatened fauna species known, or with the potential to occur in the impact area due to the presence of habitat, are listed below in Table 4-3. Habitat constraints are listed to demonstrate the type of habitat use (i.e. where foraging habitat only is present, this excludes breeding habitat for these species). It is noted that none of these species have been recorded in the Project area.

**Table 4-3: Threatened fauna species with the potential to occur in the impact area**

Species	Common Name	Habitat Constraints	NSW listing status	EPBC listing status
<i>Anomalopus mackayi</i>	Five-clawed Wormskink	Presence of cracking clay soils AND fallen/standing dead timber including logs, decomposing logs, tree roots & leaf litter.	E	V
<i>Anseranas semipalmata</i>	Magpie Goose	-	V	-
<i>Antechinomys laniger</i>	Kultarr	-	E	-
<i>Artamus cyanopterus cyanopterus</i>	Dusky Woodswallow	-	V	-
<i>Aspidites ramsayi</i>	Woma	-	V	-
<i>Certhionyx variegatus</i>	Pied Honeyeater	-	V	-
<i>Chalinolobus picatus</i>	Little Pied Bat	-	V	-
<i>Circus assimilis</i>	Spotted Harrier	-	V	-
<i>Daphoenositta chrysoptera</i>	Varied Sittella	-	V	-
<i>Desmodium campylocaulon</i>	Creeping Tick-trefoil	-	E	-
<i>Digitaria porrecta</i>	Finger Panic Grass	-	E	-
<i>Falco hypoleucos</i>	Grey Falcon	-	E	-
<i>Falco subniger</i>	Black Falcon	-	V	-
<i>Grantiella picta</i>	Painted Honeyeater	Mistletoes present at a density of greater than five mistletoes per ha	V	-
<i>Grus rubicunda</i>	Brolga	-	V	-
<i>Hamirostra melanosternon</i>	Black-breasted Buzzard	-	V	-
<i>Hieraaetus morphnoides</i>	Little Eagle	-	V	-
<i>Hirundapus caudacutus</i>	White-throated Needletail	-	-	V

Species	Common Name	Habitat Constraints	NSW listing status	EPBC listing status
<i>Homopholis belsonii</i>	Belson's Panic	-	E	V
<i>Lepidium monoplocoides</i>	Winged Peppergrass	-	E	E
<i>Lophochroa leadbeateri</i>	Major Mitchell's Cockatoo	-	V	-
<i>Lophoictinia isura</i>	Square-tailed Kite	-	V	-
<i>Melanodryas cucullata</i>	Hooded Robin (south-eastern form)	-	V	-
<i>Ninox connivens</i>	Barking Owl	-	V	-
<i>Nyctophilus corbeni</i>	Corben's Long-eared Bat	-	V	V
<i>Phaps histrionica</i>	Flock Bronzewing	-	E	-
<i>Phascolarctos cinereus</i>	Koala	-	V	V
<i>Polytelis swainsonii</i>	Superb Parrot	-	V	V
<i>Pomatostomus Temporalis temporalis</i>	Grey-crowned Babbler (eastern subspecies)	-	V	-
<i>Rostratula australis</i>	Australian Painted Snipe	--	E	E
<i>Saccolaimus flaviventris</i>	Yellow-bellied Sheath-tail-bat	-	V	-
<i>Sminthopsis macroura</i>	Stripe-faced Dunnart	-	V	-
<i>Stagonopleura guttata</i>	Diamond Firetail	-	V	-

Impacts to these species will be appropriately offset in accordance with the conditions of the NSW Development Consent SSD 21854025, through offsetting vegetation communities which are considered habitat for these species.

## 5. Biodiversity Management Measures

The biodiversity management measures proposed in this CBMP relate specifically to the Wee Waa High School construction and are designed specifically to address the requirements of Condition B25 of SSD 21854025 and the mitigation and management measures described in the Project BDAR. The biodiversity management measures detailed in this section include:

- Identifying impact boundaries
- Vegetation clearing protocols
- Weed control

### 5.1. Identifying impact boundaries

The detailed design developed by SINSW for the Development Consent identifies the impact boundaries, areas of vegetation to be retained, and trees to be retained, shown below in Figure 2.

Management Zone 2b is to be retained and is intended to be kept as close to its natural undisturbed state as possible so that the traditional practices of the Kamilaroi People can be practiced/demonstrated within the subject land. This retained vegetation is to be managed throughout the operational life of the Project in accordance with Condition D36 of SSD 21854025 (to be addressed in a separate operational BMP to be prepared prior to the commencement of operation).

Full impact is proposed in areas mapped as Management Zone 2a, which include the concrete pathway and low flow channel areas located in the centre of Management Zone 2b.

It is intended that the boundaries will be digitally captured and displayed within the Project survey and GIS databases. This data will be made available both digitally and in hard copy map format to inform and guide vegetation clearing.

The Construction Contractor(s) will be responsible for demarcating vegetation clearing boundaries based on the detailed design and construction requirements:

- Exclusion fencing in the form of temporary fencing or bunting is to be installed around Management Zone 2b prior to any ground disturbance to visually identify the impact boundary.
- Signage is to be erected on exclusion fencing to clearly demarcate Management Zone 2b as a “No-go Zone”.





Figure 2: Impact zones for vegetation clearing

## 5.2. Vegetation clearing

### 5.2.1. Pre-clearing survey

A survey of the identified impact area is to be undertaken by a suitably qualified ecologist prior to the commencement of the construction and prior to any vegetation clearing, to determine:

- The area of native vegetation to be cleared.
- The location of any Hollow-bearing trees (HBTs) is to be recorded using GPS. In addition:
  - Any HBTs to be cleared will be marked with flagging tape and an “H” spray painted onto two or three sides of the tree trunk with fluorescent paint.
  - HBTs immediately adjacent to and / or within the impact area that will be retained will be marked, for the establishment of an exclusion zone and protection from impacts. Note that the HBTs to be retained will be differentiated (marked differently (i.e. colour)) to those HBTs that are to be removed.
- Resident fauna or habitat features that may require active management prior to or during disturbance will be recorded using GPS (see active management protocols below). This may include:
  - actively nesting birds or mammals
  - habitat features including tree hollows or fallen logs that may contain roosts; nests, dreys or dens
  - suspected active microbat roosts.
- The presence of any previously unrecorded threatened flora or fauna species requiring management under the ‘Unexpected finds’ procedure detailed below.

Features identified in the pre-clearing survey will be recorded using handheld GPS. The use of a differential GPS unit will be considered where sensitive vegetation or features are identified to provide greater accuracy of the location.

Data collected in the pre-clearing inspection will be collated and reported by the Construction Contractor.

### 5.2.2. Vegetation clearing procedure

The Construction Contractor will be responsible for ensuring the clearing of vegetation is undertaken in accordance with the following key processes, detailed further in the sections below:

- The impact boundary is clearly identified as per Section 5.1 and Figure 2 above.
- The pre-clearing procedures detailed in Section 5.2.1 are completed prior to commencement of construction and prior to any vegetation clearing.
- Removal of HBTs is to be avoided during spring, to avoid the main breeding period for hollow-dependent fauna.
- Pruning of vegetation (in lieu of vegetation removal) should be considered wherever possible to reduce the area of vegetation to be cleared.

- Surface disturbance is to be minimised and no vegetation clearing is to occur outside the approved impact area footprint (further detailed below).
- Where a requirement for active fauna management is required from the pre-clearing inspections, for example, resident fauna including actively nesting birds or mammals, tree hollows that may contain roosts, nests or dens, or suspected active microbat roosts, a qualified ecologist/licenced wildlife handler is to supervise clearing activities and manage any impacts to fauna (Section 5.2.4).
- Where vegetation is cleared, large fallen logs and woody debris will be salvaged where it is considered appropriate for use in revegetation or habitat enhancement activities (for example, next boxes). For example, HBTs requiring removal and cleared larger woody debris will be relocated adjacent to the Management Zone 2b for potential re-use in accordance with the operational BMP (to be developed as previously referenced).

### 5.2.3. Protection outside the approved disturbance area

The Construction Contractor(s) will be responsible for ensuring the following mitigation measures are implemented to protect native vegetation and key fauna habitat outside of the approved disturbance area:

- Ensure clearing of vegetation is restricted to the impact area identified in the clearing boundaries detailed above in Section 5.1.
- Project vehicles and machinery are to remain within the designated impact areas.
- Laydown or temporary disturbance areas will be sited within the impact area, or in adjacent areas which are already disturbed (for example, driveways or stopping bays).
- Procedures to avoid the spread of weeds to adjacent areas will be implemented in accordance with Section 5.3.1.
- During clearing, care will be taken to prevent damage to adjacent tree roots that are not going to be impacted:
  - trenches will be dug at least 15 m away from the base of trees to minimise root interference, and outside of drip lines for vegetation to avoid unintended pruning.
  - Where possible, a minimum trench distance from the base of the tree should be achieved in accordance with the Tree Protection Zone formula (TPZ Australian Standard 4970-2009). The TPZ is calculated by multiplying the diameter at breast height (DBH – 130 cm above the ground) by twelve.

### 5.2.4. Fauna active management

Where a need for active fauna management has been determined from the pre-clearing inspections, a qualified ecologist/licenced wildlife handler is to be present during vegetation clearing activities.

In any area to be cleared, non-habitat vegetation should be cleared first. Any fauna habitat (or resident fauna including actively nesting birds) demarcated during the pre-clearing procedure is then to be left standing overnight as a minimum (ideally longer up to three days) to encourage the self-relocation of fauna that may be using the available habitat feature.

### *Hollow-bearing trees*

HBTs may contain roosts, nests or dens for a range of species including mammals, birds and microbats. HBTs may include live trees and stags (dead standing trees with hollows). Clearing of HBTs should be avoided during spring wherever possible to avoid impacts to fauna. The following robust HBT clearing procedure is to be followed at all times:

- Removal of HBTs is to be avoided during spring, to avoid the main breeding period for hollow-dependent fauna.
- The pre-clearing procedure detailed in Section 5.2.1 is to be implemented and reviewed prior to the commencement of clearing to determine the location of HBTs and ensure all have been recorded and marked appropriately.
- Vegetation surrounding the HBT is to be cleared first, with the HBT left standing overnight (ideally longer up to three days) to encourage self-relocation of any fauna that may be using the hollow.
- Prior to clearing, HBTs should be shaken with machinery to encourage resident fauna to vacate the hollow and move to an alternative site. Relocation may be assisted by the supervising ecologist / fauna handler.
- HBTs should be soft pushed to the ground in order to reduce the impact to any remaining resident fauna.
  - Where fauna is known to remain within the hollow, an alternative method that may be considered is to lower cut sections of the tree using an arborist and crane.
- Preferentially, felled HBTs should be positioned on the ground so the entrance to the hollow faces upwards allowing any remaining resident fauna to exit.
- Felled HBTs are to be inspected by the supervising ecologist / fauna handler to confirm whether fauna have exited the tree.
- Felled HBTs are to be left overnight before mulching or relocating, to allow any remaining fauna time to exit, which will be confirmed by reinspection on the following day.

### *Arboreal mammals*

In addition to HBTs, trees which provide habitat to arboreal mammals, may be considered habitat trees. Where the presence of arboreal mammals is suspected or known, clearing of these habitat trees will be managed by:

- clearing adjacent vegetation to allow time for the animal to self-relocate of its own accord
- where the animal remains in the tree, the supervising ecologist / fauna handler will be responsible for determining the appropriate method:
  - For species such as koala or other threatened species:
    - ensuring sufficient time is allowed for the animal to relocate
    - capture and relocation may be considered
  - Shaking the tree with machinery to be used during clearing activities to encourage the animal to move to an alternative location



- soft pushing the tree to the ground in order to reduce the likelihood of disturbance to the habitat feature/animal present
- inspection of the felled tree to confirm that the mammal has relocated.
- where the mammal is still present, leave the felled tree overnight to encourage the animal to relocate, which will be confirmed by reinspection on the following day.

### *Nesting birds*

Trees should be inspected for nests immediately prior to clearing to ensure that the nest is not active. If the nest is not active, the tree can be cleared.

Where a nest is active, the birds present (generally fledglings) will be collected where safe and taken to a wildlife carer to be cared for, prior to later release. The nest will be removed from the tree and an inspection undertaken to confirm the nesting activity hasn't recommenced. If nesting has recommenced, then the nest will be removed again before any nest can be established and the tree then cleared.

### 5.2.5. General fauna management

Not specific to any type of habitat feature, fauna species or group, construction procedures will include measures to further minimise direct and indirect impacts to fauna including:

- Preparation (by the Construction Contractor) of a fauna rescue protocol that includes notification of local wildlife carers and a veterinarian should they be required during clearing.
- Temporary construction features such as trenches, and pits should be fenced/covered overnight and when not in use for construction. Open trenches will be checked twice daily by the Construction Contractor.
- All external lighting associated with the development uses best management practice for bat deterrence.
- Vehicle speed limits within the construction areas should be reduced to minimise fauna strike risk.
- Vehicle use will be restricted to the impact area.

### 5.2.6. Unexpected threatened species finds

If previously unrecorded threatened flora or fauna are identified during pre-clearing surveys or clearing activities, a qualified ecologist will be engaged to determine the significance of impacts and provide advice on approval requirements.

Works in these areas, where potential impacts to threatened species are identified, will not be undertaken until authorisation to proceed is provided by the relevant authority.

## 5.3. Control of weeds and feral pests

Control of weeds and feral pests during the construction phase will be the responsibility of the Construction Contractor. Following completion of the Project construction, management of weeds and feral pests will be the responsibility of the NSW Department of Education.

### 5.3.1. Weeds

Weeds previously recorded within the Project site are detailed above in Section 4.2.3. Disturbance activities may result in the spread of weed species present within the impact area, resulting in potential impacts to surrounding properties and areas of native vegetation. Weeds will be proactively managed in the impact area to avoid the spread of existing weeds and to manage any incursions which arise throughout construction and operation of the Project.

Weed management measures during construction will include:

- Prior to disturbance activities, a weed survey and assessment is to be undertaken in each work area by a person suitably qualified to identify weed species (e.g. ecologist, agronomist or Council weed officer).
- Weeds of National Significance and/or State and/or Priority weeds listed under the listed under the *North West Regional Strategic Weed Management Plan 2017 – 2022*<sup>1</sup> which were recorded in the BDAR, or previously unrecorded, must be notified and managed accordingly.
- Ensure all equipment, machinery and vehicles are free of weed seeds, mud, soil and organic matter before entering and exiting the works area.
- Imported construction materials including road base, gravel, topsoil for landscaping etc is to be sourced from reputable suppliers and certified free from weed species wherever possible.
- Regular inspections of work areas, material stockpiles, laydown areas and adjacent areas should be undertaken to monitor weed presence and identify any weed infestations which may require management.
- Control and management of weeds identified in work areas should be undertaken in accordance with the *North West Regional Strategic Weed Management Plan 2017-2022*<sup>1</sup> and the *NSW Pesticides Act 1999*.
- Any weed management activities undertaken will be documented by the Construction Contractor, with the following information being recorded:
  - The date, time and location of areas that have undergone weed control activities.
  - Methods used, including the names/brands of any chemicals used;
  - Issues encountered; and
  - Recommended frequency and methods for follow-up weed control.
- Where identified that weed control activities have not been effective, the method of control implemented will be reviewed prior to further management.

Ongoing weed management of Management Zone 2b will be detailed in the operational BMP to be prepared in accordance with SSD 21854025 Condition D36 prior to the commencement of operation.

### 5.3.2. Feral animals

A number of introduced vertebrate pest species are common to the region and have the potential to both compete with native species and cause considerable damage to land and vegetation.

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<sup>1</sup> [North West Regional Strategic Weed Management Plan 2017-2022 \(nsw.gov.au\)](https://www.nsw.gov.au/north-west-regional-strategic-weed-management-plan-2017-2022)



Contamination and waste management will be managed in accordance with the Project CEMP. This will identify the waste management measures to be implemented to reduce opportunities for scavenging for animals such as foxes, wild dogs and feral cats.

The Project will cooperate with Narrabri Shire Council to facilitate existing and ongoing vertebrate pest control programs being undertaken on freehold land in the Project Site. Any vertebrate pest control activities undertaken will be done in accordance with the requirements of the Local Land Services.

## 6. Monitoring and reporting

Monitoring and reporting during the construction phase of the Project is required to measure the efficacy of the management measures detailed in this CBMP, and to provide a record of compliance with the Development Consent.

The minimum monitoring and reporting requirements for implementation of the CBMP are summarised below in Table 6-1.

**Table 6-1: Monitoring and reporting**

Monitoring factor	Section	Timing/Frequency	Reporting	Responsibility
<b>Identification of impact boundaries</b>				
Ensuring impact boundaries are clearly demarcated and adhered to through the installation of exclusion fencing and signage.	5.1	<ul style="list-style-type: none"> <li>• Prior to commencement of construction</li> <li>• As required for the duration of construction</li> </ul>	<ul style="list-style-type: none"> <li>• Records to be kept of boundaries marked and recorded using GIS prior to construction.</li> </ul>	Construction Contractor in accordance with architectural landscape plans.
<b>Vegetation clearing</b>				
Pre-clearing procedure	5.2.1	<ul style="list-style-type: none"> <li>• Pre-clearing survey to be completed by ecologist prior to the commencement of construction</li> </ul>	<ul style="list-style-type: none"> <li>• Pre-clearing report</li> </ul>	Construction Contractor in consultation with qualified ecologist.
Hollow-bearing trees	5.2.2	<ul style="list-style-type: none"> <li>• Prior to commencement of vegetation clearing</li> <li>• As required for the duration of clearing, which may include daily monitoring where active fauna management is required.</li> </ul>	<ul style="list-style-type: none"> <li>• Records to be collated weekly:                             <ul style="list-style-type: none"> <li>○ The GPS location of all HBTs cleared</li> <li>○ Any HBTs retained</li> </ul> </li> <li>• All records to be collated at the completion of vegetation clearing.</li> </ul>	Construction Contractor in consultation with qualified ecologist
Implementation of fauna active management protocols	5.2.2	As required for the duration of clearing, which may include daily monitoring where active fauna management is required.	<ul style="list-style-type: none"> <li>• Records to be collated weekly:                             <ul style="list-style-type: none"> <li>○ The GPS location of all fauna or habitat features</li> <li>○ Actions undertaken</li> </ul> </li> <li>• All records to be collated at the completion of vegetation clearing.</li> </ul>	Qualified ecologist / licenced fauna handler
Implementation of fauna rescue protocol	5.2.4	As required for the duration of clearing, which may include daily monitoring where active fauna management is required.	<ul style="list-style-type: none"> <li>• Records to be collated weekly:                             <ul style="list-style-type: none"> <li>○ The GPS location of all fauna managed</li> <li>○ Actions undertaken</li> </ul> </li> </ul> <p>All records to be collated at the completion of vegetation clearing.</p>	Qualified ecologist / licenced fauna handler

Monitoring factor	Section	Timing/Frequency	Reporting	Responsibility
Unexpected threatened species finds	5.2.6	As required	<ul style="list-style-type: none"> <li>The location of the find</li> <li>The species and threatened status</li> <li>Confirmation of stop work</li> <li>Outcomes of assessment of significance</li> <li>Outcome of regulatory agency consultation</li> </ul>	Construction Contractor in consultation with qualified ecologist and the Proponent
Inspection of open trenches for trapped fauna	5.2.5	Prior to commencing work in a trench, as required	If fauna is identified	Construction Contractor in consultation with qualified ecologist
Placing laydown and temporary disturbance areas outside of no-go zones	5.1, 5.2.3	Daily / weekly	In the event of a nonconformance	Construction Contractor
No vegetation clearing is undertaken outside the impact area or areas marked as exclusion zones / no clearing	5.2.3	Daily / weekly	In the event of a nonconformance	Construction Contractor in consultation with the Proponent
<b>Construction weed management</b>				
Weed introduction, infestations and management	5.3	At least monthly or more frequently where weed infestations / management actions are required.	Records to be kept of weeds recorded and management actions taken. To be compiled monthly and at the completion of construction to inform ongoing operational weed management to be addressed in the operational BMP to be prepared in accordance with Condition D36.	Construction Contractor in consultation with the Proponent
Incident and nonconformance with CBMP and / or Project Development Consent		As required	In the event of a nonconformance or incident	Construction Contractor / Proponent
CBMP Review		At the completion of the construction, in response to a required change to measures	As required, including in accordance with the consultation process detailed in the consent condition.	The Proponent in consultation with the Construction Contractor

Monitoring factor	Section	Timing/Frequency	Reporting	Responsibility
		documented in the CBMP, or, annually at a minimum.		

## Appendix A Consultation log

Date	Stakeholder	Format	Summary of outcomes
24/10/2022	Biodiversity and Conservation Science Directorate (BCS) of the Department of Planning and Environment (DPE), Dubbo	Phone call	Discussion on preferred mechanism for consultation / review of the CBMP. Preference is to send via email for review.
2/11/2022	BCS Dubbo	Email	Draft CBMP (v0d) submitted for review and comment
8/11/2022	BCS Dubbo	Letter (Attached below)	Minor amendments to references requested by BCS – updated within version E





## Department of Planning and Environment

Our ref: DOC22/985758  
Your ref: SSD 21854025

Paul Nelson  
Design Manager  
Built  
[paulnelson@built.com.au](mailto:paulnelson@built.com.au)

Dear Paul

### Wee Waa High School Construction Biodiversity Management Plan

Thank you for your e-mail dated 2 November 2022 to the Biodiversity, Conservation and Science Directorate (BCS) of the Department of Planning and Environment (DPE) inviting comments on the Wee Waa High School Construction Biodiversity Management Plan (CBMP).

BCS regards the CBMP to adequately fulfill the requirements of Part B, Condition B25 of SSD 21854025. We do, however suggest that there are two minor points that should be rectified:

- Section 5.2.3 states that "*Project vehicles and machinery are to remain within the impact area wherever practicable*" while Section 5.2.5 "*Vehicle use will be restricted to the impact area*". Section 5.2.3 should be amended to reflect the latter statement.
- Section 4.2.2 refers to the *Northern Tablelands Regional Strategic Weed Management Plan 2017 – 2022*. Elsewhere in the CBMP, Section 5.3.1 for example, reference is made to the *Central Tablelands Regional Strategic Weed Management Plan 2017 – 2022*. The appropriate document should be referenced consistently in the CBMP.

If you have any questions about this advice, please do not hesitate to contact David Geering, Senior Conservation Planning Officer, via [david.geering@environment.nsw.gov.au](mailto:david.geering@environment.nsw.gov.au) or (02) 6883 5335.

Yours sincerely

A handwritten signature in black ink, appearing to read "Liz Mazzer".

**Liz Mazzer**  
A/ Senior Team Leader Planning North West  
Biodiversity, Conservation and Science Directorate

8 November 2022

