

Proposed Cemetery - Douglas Park Cemetery

Application Number: **03129**

Commencement Date:
18/09/2025

Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Proposed Cemetery - Douglas Park Cemetery

1.1.2 Project industry type *

Private

1.1.3 Project industry sub-type

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1.1.4 Estimated start date *

01/09/2026

1.1.4 Estimated end date *

01/09/2076

1.2 Proposed Action details

1.2.1 Provide an overview of the proposed action, including all proposed activities. *

The proposal is for an SSD Concept Plan Approval and Stage 1 detailed works for a new multi – denominational Cemetery at 430 – 490 Douglas Park Drive, Douglas Park (Lot 2, DP 250359).

The proposal is for the use and operation of the site as a cemetery with a maximum, staged capacity of up to 37, 107 Burial Plots, including a crematorium, chapel, administration building, remembrance sanctuaries and associated works.

The proposal will require pre-construction and pre-clearing activities; clearing, construction and ongoing maintenance and operations, including Asset Protection Management. Ongoing biodiversity management is proposed to occur onsite, however has not been implemented yet.

The site approximately covers 16.79 ha, where 15.27 ha of naturally occurring vegetation has been identified and an impact of 9.63 ha of native vegetation will occur. Mapping is to be attached.

1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

No

1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? *

BC Act – SSDA project requiring enactment of the Biodiversity Offset Scheme where credits are to be retired for the proposal, and consideration of SAIL matters.

EPBC Act – Impacts on matters of National Environmental Significance in accordance with the Significant Impact Guidelines 1.1 upon a) Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest, and b) Shale Sandstone Transition Forest of the Sydney Basin Bioregion.

1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. *

The Aboriginal Cultural Heritage Assessment Report (Travers bushfire & ecology, June 2025, REF: HTB03.9ACHAR) Appendix 1 contains copies of the correspondence with Indigenous heritage groups.

Refer attached Stakeholder Engagement reports conducted as part of the Development Application documentation:

- Community & Stakeholder Engagement Report (KRC)
- Engagement Table Summary (Ethos Urban/Colliers)
- Aboriginal Cultural Heritage Assessment Report (Travers)
- Connecting With Country Report (Artefact)
- Dharawal Environment Heritage Letter (Dharawal Environmental & Heritage)
- Social Impact Assessment (Forward Thinking)

It should be noted the applicant (Benima) continues to undertake community consultation throughout the application and assessment process with further initiatives beyond approval also.

1.3.1 Identity: Referring party

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1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN 85624419870
Organisation name TBE ENVIRONMENTAL PTY LTD
Organisation address 2250 NSW

Referring party details

Name Lindsay Holmes
Job title Ecologist
Phone 0243405331
Email lholmes@traverseecology.com.au
Address 52 The Avenue, Kariong, NSW, 2250

1.3.2 Identity: Person proposing to take the action

1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? *

No

1.3.2.2 Is Person proposing to take the action an organisation or business? *

Yes

Person proposing to take the action organisation details

ABN/ACN 77003010320
Organisation name BENIMA PTY LTD
Organisation address 2000 NSW

Person proposing to take the action details

Name William Singer
Job title Project Manager
Phone 0427137126
Email wsinger@htbuilding.com.au
Address 72 Glendower Street, Gilead, NSW, 2560

1.3.2.14 Are you proposing the action as part of a Joint Venture? *

No

1.3.2.15 Are you proposing the action as part of a Trust? *

No

1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. *

No previous referred actions.

No corporate environmental policies and frameworks have been implemented.

1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

No corporate environmental policies and frameworks have been implemented.

1.3.3 Identity: Proposed designated proponent

1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? *

No

1.3.3.2 Is Proposed designated proponent an organisation or business? *

Yes

Proposed designated proponent organisation details

ABN/ACN 77003010320
Organisation name BENIMA PTY LTD
Organisation address 2000 NSW

Proposed designated proponent details

Name William Singer
Job title Project Manager
Phone 0427137126
Email wsinger@htbuilding.com.au
Address 72 Glendower Street, Gilead, NSW, 2560

1.3.4 Identity: Summary of allocation

✔ Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

ABN/ACN	85624419870
Organisation name	TBE ENVIRONMENTAL PTY LTD
Organisation address	2250 NSW
Representative's name	Lindsay Holmes
Representative's job title	Ecologist
Phone	0243405331
Email	lholmes@traverseecology.com.au
Address	52 The Avenue, Kariong, NSW, 2250

✔ Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	77003010320
Organisation name	BENIMA PTY LTD
Organisation address	2000 NSW
Representative's name	William Singer
Representative's job title	Project Manager
Phone	0427137126
Email	wsinger@htbuilding.com.au
Address	72 Glendower Street, Gilead, NSW, 2560

✔ Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

ABN/ACN	77003010320
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Organisation name	BENIMA PTY LTD
Organisation address	2000 NSW
Representative's name	William Singer
Representative's job title	Project Manager
Phone	0427137126
Email	wsinger@htbuilding.com.au
Address	72 Glendower Street, Gilead, NSW, 2560

1.4 Payment details: Payment exemption and fee waiver

1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)? *

No

1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? *

No

1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?

No

1.4.7 Has the department issued you with a credit note? *

No

1.4.9 Would you like to add a purchase order number to your invoice? *

No

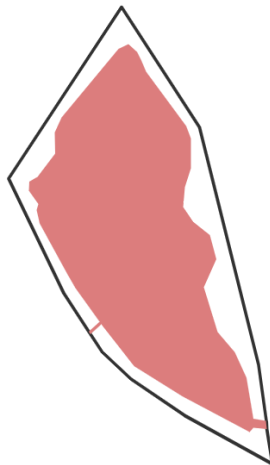
1.4 Payment details: Payment allocation

1.4.11 Who would you like to allocate as the entity responsible for payment? *

Person proposing to take the action

2. Location

2.1 Project footprint



Project Area: 17.73 Ha **Disturbance Footprint:** 12.65 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

430 – 490 Douglas Park Drive, Douglas Park, NSW 2569. Lot 2, DP 250359.

2.2.2 Where is the primary jurisdiction of the proposed action? *

New South Wales

2.2.3 Is there a secondary jurisdiction for this proposed action? *

No

2.2.5 What is the tenure of the action area relevant to the project area? *

Private ownership

3. Existing environment

3.1 Physical description

3.1.1 Describe the current condition of the project area's environment.

Location – 430-490 Douglas Park Drive, Douglas Park NSW 2569.

Distance from major towns – 18km south-west of Campbelltown, 15km south of Camden, 30km north-west of Wollongong.

Zoning – RU2 Rural Landscape.

Current land use – Rural, one house and grazing animals, disused tennis court, 4x shipping containers.

The current vegetation has varying conditions throughout the site ranging from good – moderate quality to derived and poor. The following condition classes are as follows:

- *PCT 3321 Cumberland Shale – Sandstone Ironbark Forest* (High Sandstone Influence) – 0.45 ha (0.04 ha impacted) - equivalent to the CEEC Cumberland Shale – Sandstone Transition Forest
- *PCT 3321 Cumberland Shale – Sandstone Ironbark Forest* (Low Sandstone Influence) – 4.8 ha (1.28 ha impacted) - equivalent to the CEEC Shale – Sandstone Transition Forest
- *PCT 3321 Cumberland Shale – Sandstone Ironbark Forest* (Low Sandstone influence regrowth) – 6.86 ha (5.74 ha impacted) - equivalent to the CEEC Shale – Sandstone Transition Forest of the Sydney Basin Bioregion
- *PCT 3321 Cumberland Shale – Sandstone Ironbark Forest* (poor) – 1.43 ha (1.15 ha impacted) - equivalent to the CEEC Shale – Sandstone Transition Forest of the Sydney Basin Bioregion
- *PCT 3320 Cumberland Shale Plains Woodland* – 0.63 ha (0.34 ha impacted) – equivalent to the CEEC Cumberland Plain Woodland in the Sydney Basin Bioregion
- *PCT 3320 Cumberland Shale Plains Woodland* (Derived Native Grassland) – 1.1 ha (1.08 ha impacted) – (equivalent to the CEEC under the *BC Act*, not equivalent under the *EPBC Act*)

Additionally, the proposed development will impact the following non-native vegetation:

- Exotic pasture – 1.28 ha (1.1 ha impacted)

The proposal is not within a flood affected area and has not suffered from any major bushfires in the last 10 years.

3.1.2 Describe any existing or proposed uses for the project area.

Current use – Existing rural residential property with some grazing animals.

Future use - The proposed use is for a SSD cemetery.

3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

Significant vegetation occurs onsite as the EPBC listed Shale-Sandstone Transition Forest and Cumberland Shale Plain Woodland and Shale – Sandstone Transition Forest

There are no areas of geological significance, eg, karst, cliffs, caves.

There are no confirmed watercourses on site, only 1 small farm dam.

3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

Topography of the site is approximately 132 – 150 m AHD. The site has gentle slopes generally between 1-3% and is situated close to a low ridgetop within low rolling hills. Local relief to 30 m, slopes are usually <5%. Broad rounded crests and ridges with gently inclined slopes.

3.2 Flora and fauna

3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.

Ecological survey has occurred over the site for at least 7 years.

The following vegetation communities are present onsite:

- *PCT 3320 - Cumberland Shale Plains Woodland* – Most, except the derived native grassland is part of the Cumberland Plain Shale Woodlands and Shale Gravel Transition Forest critically endangered ecological community
- *PCT 3321 – Cumberland Shale-Sandstone Ironbark Forest* – All mapped occurrences are part of the Shale Sandstone Transition Forest of the Sydney Basin critically endangered ecological community.

EPBC listed threatened entities observed on site include:

- Grey-headed Flying-fox (*Pteropus poliocephalus*)
- Large-eared Pied Bat (*Chalinolobus dwyeri*)
- *Grevillea parviflora subsp. parviflora*
- *Persoonia bargoensis*

The BDAR by Travers bushfire & ecology (June 2025) contains observed species lists for flora (Table 3-1 and fauna (Table 3-7).

3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

Vegetation is described as either PCT 3320, 3321 or exotic pasture. The vegetation types have been broken down into zones of condition.

Mature and more intact vegetation is located around the perimeter of the site. The majority of the site has been impacted by a combination of past clearing and ongoing grazing including derived native grassland and in a variable state of regrowth. Some areas are dominated by a thick layer of *Kunzea ambigua*, but despite extensive clearing and grazing, species diversity was high.

- *PCT 3320 - Cumberland Shale Plains Woodland* - CEEC
- *PCT 3320 – Derived Native Grassland* – CEEC only under the *BC Act*
- *PCT 3321 – Cumberland Shale-Sandstone Ironbark Forest (High Sandstone Influence)* - CEEC
- *PCT 3321 – Cumberland Shale-Sandstone Ironbark Forest (Low Sandstone Influence)* - CEEC
- *PCT 3321 – Cumberland Shale – Sandstone Ironbark Forest (Low Sandstone Influence Regrowth)* - CEEC
- *PCT 3321 – Cumberland Shale – Sandstone Ironbark Forest (Low Sandstone Influence Poor)* - CEEC
- Exotic Pasture

Vegetation condition has been measured using BAM 2020 for the BDAR. Condition scores are listed in the final column.

Reference attachment - VI scores extracted.docx

Geology - Gently undulating rises on Wianamatta Group shales and Hawkesbury shale.

Soils – Blacktown soil landscape. The condition is variable due to grazing as well as there being a grassed area around the existing dwelling.

Bushfire – The site has not been affected by bushfire for >10 years.

3.3 Heritage

3.3.1 Describe any Commonwealth Heritage Places Overseas or other places recognised as having heritage values that apply to the project area.

No Commonwealth heritage places were listed in the Protected Matters coordinate search tool. The ACHAR (Travers bushfire & ecology) stated that “No Aboriginal objects, scarred, carved or culturally modified trees, engravings, axe grinding grooves or areas of PAD were identified within the footprint of the study area.”

Reference - Attached ACHAR, page iv (Exec summary)

3.3.2 Describe any Indigenous heritage values that apply to the project area.

Not applicable to the application as per the ACHAR

3.4 Hydrology

3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. *

There is a mapped stream to the east of the subject land (Water Management (General) Regulation 2018). An inspection at multiple cross points was undertaken across the mapped stream and no channelisation or other forms of stream morphology were observed. Whilst a small shallow dam was present, the site evidence is that a watercourse is not present but rather is a drainage swale. Overland waterflow is to the north and gradually into the Nepean River.

4. Impacts and mitigation

4.1 Impact details

Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.

EPBC Act section	Controlling provision	Impacted	Reviewed
S12	World Heritage	No	Yes
S15B	National Heritage	No	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	Yes	Yes
S20	Migratory Species	No	Yes
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	No	Yes
S26	Commonwealth Land	No	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	No	Yes

4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

There are no local world heritage items

4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

There are no nearby national heritage places.

4.1.3 Ramsar Wetland

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The proposal does not occur within 10km of a RAMSAR wetland

4.1.4 Threatened Species and Ecological Communities

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Threatened species

Direct impact	Indirect impact	Species	Common name
No	No	<i>Acacia bynoeana</i>	Bynoe's Wattle, Tiny Wattle
No	No	<i>Allocasuarina glareicola</i>	
No	No	<i>Anthochaera phrygia</i>	Regent Honeyeater
No	No	<i>Aphelocephala leucopsis</i>	Southern Whiteface
No	No	<i>Aprasia parapulchella</i>	Pink-tailed Worm-lizard, Pink-tailed Legless Lizard
No	No	<i>Austrocordulia leonardi</i>	Sydney Hawk Dragonfly
No	No	<i>Botaurus poiciloptilus</i>	Australasian Bittern
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Callocephalon fimbriatum</i>	Gang-gang Cockatoo
No	No	<i>Calyptorhynchus lathami lathami</i>	South-eastern Glossy Black-Cockatoo
Yes	Yes	<i>Chalinolobus dwyeri</i>	Large-eared Pied Bat, Large Pied Bat
No	No	<i>Climacteris picumnus victoriae</i>	Brown Treecreeper (south-eastern)
No	No	<i>Commersonia prostrata</i>	Dwarf Kerrawang
No	No	<i>Cynanchum elegans</i>	White-flowered Wax Plant
No	No	<i>Dasyurus maculatus maculatus</i> (SE mainland population)	Spot-tailed Quoll, Spotted-tail Quoll, Tiger Quoll (southeastern mainland population)
No	No	<i>Erythroriorchis radiatus</i>	Red Goshawk
No	No	<i>Falco hypoleucos</i>	Grey Falcon
No	No	<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
No	No	<i>Genoplesium baueri</i>	Yellow Gnat-orchid, Bauer's Midge Orchid, Brittle Midge Orchid

Direct impact	Indirect impact	Species	Common name
No	No	<i>Grantiella picta</i>	Painted Honeyeater
No	Yes	<i>Grevillea parviflora</i> subsp. <i>parviflora</i>	Small-flower Grevillea
No	No	<i>Haloragis exalata</i> subsp. <i>exalata</i>	Wingless Raspwort, Square Raspwort
No	No	<i>Heleioporus australiacus</i> <i>australiacus</i>	Giant Burrowing Frog, Eastern Owl Frog
No	No	<i>Hirundapus caudacutus</i>	White-throated Needletail
No	No	<i>Hoplocephalus bungaroides</i>	Broad-headed Snake
No	No	<i>Lathamus discolor</i>	Swift Parrot
No	No	<i>Leucopogon exolasius</i>	Woronora Beard-heath
No	No	<i>Litoria aurea</i>	Green and Golden Bell Frog
No	No	<i>Macquaria australasica</i>	Macquarie Perch
No	No	<i>Melaleuca deanei</i>	Deane's Melaleuca
No	No	<i>Melanodryas cucullata cucullata</i>	South-eastern Hooded Robin, Hooded Robin (south-eastern)
No	No	<i>Neophema chrysostoma</i>	Blue-winged Parrot
No	No	<i>Numenius madagascariensis</i>	Eastern Curlew, Far Eastern Curlew
No	No	<i>Persicaria elatior</i>	Knotweed, Tall Knotweed
No	Yes	<i>Persoonia bargoensis</i>	Bargo Geebung
No	No	<i>Persoonia hirsuta</i>	Hairy Geebung, Hairy Persoonia
No	No	<i>Petauroides volans</i>	Greater Glider (southern and central)
No	No	<i>Petaurus australis australis</i>	Yellow-bellied Glider (south-eastern)
No	No	<i>Petrogale penicillata</i>	Brush-tailed Rock-wallaby
No	No	<i>Phascolarctos cinereus</i> (combined populations of Qld, NSW and the ACT)	Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory)
No	No	<i>Pimelea spicata</i>	Spiked Rice-flower
No	No	<i>Pomaderris brunnea</i>	Rufous Pomaderris, Brown Pomaderris
No	No	<i>Pomaderris cotoneaster</i>	Cotoneaster Pomaderris

Direct impact	Indirect impact	Species	Common name
No	No	<i>Pseudomys novaehollandiae</i>	New Holland Mouse, Pookila
Yes	Yes	<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox
No	No	<i>Pterostylis saxicola</i>	Sydney Plains Greenhood
No	No	<i>Pycnoptilus floccosus</i>	Pilotbird
No	No	<i>Rhizanthella slateri</i>	Eastern Underground Orchid
No	No	<i>Rhodamnia rubescens</i>	Scrub Turpentine, Brown Malletwood
No	No	<i>Rostratula australis</i>	Australian Painted Snipe
No	No	<i>Stagonopleura guttata</i>	Diamond Firetail
No	No	<i>Syzygium paniculatum</i>	Magenta Lilly Pilly, Magenta Cherry, Daguba, Scrub Cherry, Creek Lilly Pilly, Brush Cherry
No	No	<i>Thelymitra kangaloonica</i>	Kangaloon Sun Orchid
No	No	<i>Thesium australe</i>	Austral Toadflax, Toadflax
No	No	<i>Tringa nebularia</i>	Common Greenshank, Greenshank

Ecological communities

Direct impact	Indirect impact	Ecological community
No	No	Castlereagh Scribbly Gum and Agnes Banks Woodlands of the Sydney Basin Bioregion
No	No	Coastal Swamp Sclerophyll Forest of New South Wales and South East Queensland
No	No	Coastal Upland Swamps in the Sydney Basin Bioregion
No	No	Cooks River/Castlereagh Ironbark Forest of the Sydney Basin Bioregion
Yes	Yes	Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest
No	No	River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria
Yes	Yes	Shale Sandstone Transition Forest of the Sydney Basin Bioregion
No	No	Western Sydney Dry Rainforest and Moist Woodland on Shale

4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

Direct impacts on Shale Sandstone Transition Forest of 8.21 ha.

Direct impacts on Cumberland Plain Shale Woodlands and Shale Gravel Transition Forest of 0.34 ha.

Zero direct impact on threatened flora entities (*Grevillea parviflora* and *Persoonia bargoensis*).

Direct impacts on foraging habitat for Grey-headed Flying-Fox and Large-eared Pied Bat.

Direct and indirect impacts on all threatened entities and non-threatened entities are described in the BDAR (Table 5-2 and Table 5-3).

Attachment - HTB03.13_FF003_EPBCDevFootprint_2025.08.27

Direct impacts = entities within the development footprint.

Indirect impacts = threatened flora species located within the site but within conserved parts of the site.

The development footprint is located several metres from any recorded *Persoonia bargoensis* or *Grevillea parviflora*. There is fencing erected around what will be the proposal conservation area, therefore lowering the chances of direct impacts by removing vehicular access. There are still some indirect impacts that need to be considered such as trampling, rubbish dumping and picking of fruit/flowers. These will be considered in detail within a future Biodiversity Management Plan (or equivalent) for the site.

4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact?

*

Yes

4.1.4.5 Describe why you consider this to be a Significant Impact. *

The EPBC Ecological Assessment Report (Travers bushfire & ecology) has identified that a significant impact upon a matter of national environmental significance was likely for 1. Shale Sandstone Transition Forest of the Sydney Basin Bioregion and 2. Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest.

EPBC Act Ecological Assessment Report has been prepared for EPBC entities and attached.

There is a reduction in area of the 2 communities hence a significant impact.

4.1.4.7 Do you think your proposed action is a controlled action? *

No

4.1.4.9 Please elaborate why you do not think your proposed action is a controlled action.

*

Travers bushfire & ecology recommends that the proposed action is not a controlled action on the following points:

- Site has an existing Masterplan DA history approvals which has been activated of a similar nature.
- The impact area is focused on regrowth areas that have been cleared in the past and are actively grazed.
- Does not result in further fragmentation of local connectivity and maintains connectivity around the site.
- Limited impacts to native fauna: ~94% of trees retained within the development footprint
- Impacts to EPBC listed fauna are on foraging resources, not breeding resources.
- Surveys indicate no removal of known EPBC listed threatened flora species is required.
- Mature vegetation areas are being avoided. The aerial imagery shows mature vegetation around the outer perimeter of the site with some scattered mature trees in the middle, surrounded by regrowth and cleared lands which is where the proposed action is focused. The BDAR has used the BAM methodology to identify the vegetation integrity score for each vegetation zone. The majority of the proposed action is focused on areas where the score was below 50, including areas that were too poor to require offsetting under the methodology.
- The proposal avoids actions that lead to isolation of habitats or fragmentation. Vegetation around the perimeter of the site is to be maintained to ensure that connectivity is not severed by the proposal.

4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

Impacts from clearing native vegetation and threatened species habitat has been avoided or minimised by locating the proposal in areas:

- Avoiding broad areas mature and fully structure native vegetation of highest biodiversity value and takes advantage of the degraded portions of the site where the native vegetation and does not contain recorded threatened flora species.
- The native vegetation buffer fully conserves the observed specimens of both *Grevillea parviflora* subsp. *parviflora* and *Persoonia bargoensis*. There are two (2) observed specimens of *Persoonia bargoensis* to date. Both specimens are located within a setback area that will not be directly impacted.
- The proposal avoids 37% of the native vegetation on site (9.63/15.27 ha) to be impacted.

The proposal has been located and/or designed to avoid or minimise prescribed biodiversity impacts

- Development has been located taking advantage of the disturbed zones – areas being used for an existing dwelling and grazing, along with mostly regrowth vegetation
- Access roads located on existing tracks or through existing cleared zones – avoiding the removal of mature trees
- Location of surface works to avoid direct impacts on the habitat features such as habitat trees and mature trees – only 34/532 assessed trees in the development footprint area and within 10-15 m are required for removal (6.4%)
- The location of the proposal seeks to avoid severing or interfering with corridors connecting different areas of habitat – maintaining connectivity from the adjoining biobanking lands at St Marys Towers to the Nepean River
- The proposal will have minimal impact on hydrological processes
- The earlier concept plans contained small recreational areas in the conservation areas. As a minimisation measure, the outer pathway for maintenance will have a dual usage and be suitable as a walking trail, however there will be no additional clearing required to create the secondary usage, and the recreational facilities along the track have been taken out of the current plans to minimise impacts in the conservation portion of the site.

4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

The proposed offsets for various entities have been undertaken in the BDAR following the BAM 2020 methodology.

PCT 3320 Cumberland Shale Plains Woodand = 7 credits

PCT 3321 Cumberland Shale-Sandstone Ironbark Forest = 194 credits

Large-eared Pied Bat = 249 credits

Grey-headed Flying-fox = 0 credits (not impacting breeding habitat)

Grevillea parviflora = 8 credits

Persoonia bargoensis = 2 credits

Impacts to the flora species are based on buffers to known individuals but there are no direct impacts or proposed removal of individuals.

Reference: Biodiversity Credit Report

4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Species	Common name
No	No	<i>Actitis hypoleucos</i>	Common Sandpiper
No	No	<i>Apus pacificus</i>	Fork-tailed Swift
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Calidris melanotos</i>	Pectoral Sandpiper
No	No	<i>Cuculus optatus</i>	Oriental Cuckoo, Horsfield's Cuckoo
No	No	<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
No	No	<i>Hirundapus caudacutus</i>	White-throated Needletail
No	No	<i>Motacilla flava</i>	Yellow Wagtail
No	No	<i>Numenius madagascariensis</i>	Eastern Curlew, Far Eastern Curlew
No	No	<i>Pandion haliaetus</i>	Osprey
No	No	<i>Tringa nebularia</i>	Common Greenshank, Greenshank

4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.5.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

There were no recordings of migratory species utilising the site

4.1.6 Nuclear

4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

Project is not nuclear.

4.1.7 Commonwealth Marine Area

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

Project is not nearby a marine area

4.1.8 Great Barrier Reef

4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

Project is not in QLD

4.1.9 Water resource in relation to large coal mining development or coal seam gas

4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

Project does not include coal mining or coal seam gas

4.1.10 Commonwealth Land

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The proposal impacts private land only, not Commonwealth land

4.1.11 Commonwealth Heritage Places Overseas

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The proposal does not impact Commonwealth Heritage Places Overseas

4.1.12 Commonwealth or Commonwealth Agency

4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? *

No

4.2 Impact summary

Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

- Threatened Species and Ecological Communities (S18)

Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

4.3 Alternatives

4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? *

No

4.3.8 Describe why alternatives for your proposed action were not possible. *

Refer to section 4.8 page 28, Consideration of Alternatives in the HTB03.13 Douglas Park EPBC Ecological Assessment Report 12.9.25

5. Lodgement

5.1 Attachments

1.2.7 Public consultation regarding the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Douglas Park Memorial Park - Aboriginal Cultural Heritage Assessment Report.pdf Aboriginal cultural heritage report		No	High
#2.	Document	Douglas Park Memorial Park - Community and Stakeholder Engagement Report.pdf Community and stakeholder information		No	High
#3.	Document	Douglas Park Memorial Park - Connecting With Country Report.pdf Connecting with country reporting		No	High
#4.	Document	Douglas Park Memorial Park - Dharawal Environment Heritage Letter.pdf Aboriginal heritage letter from LALC		No	High
#5.	Document	Douglas Park Memorial Park - Engagement Table Summary.pdf Stakeholder engagement information		No	High
#6.	Document	Douglas Park Memorial Park - Social Impact Assessment.pdf Social impact assessment		No	High

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	VI scores extracted.docx Vegetation integrity scores from the BDAR (Table 3.5 of section 3.1.7)		No	High

3.3.1 Commonwealth heritage places overseas or other places that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Appendix AA - Aboriginal Culutral Heritage Assessment Report.pdf Aboriginal Culutral Heritage Assessment Report		No	High

4.1.4.2 (Threatened Species and Ecological Communities) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	HTB03.13_FF003_EPBCDevFootprint_2025.08.27.pdf Vegetation mapping and impacts areas on TECs		No	High

4.1.4.5 (Threatened Species and Ecological Communities) Why you consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	HTB03.13 Douglas Park EPBC Ecological Assessment Report 12.9.25.pdf EPBC Act Ecological Assessment		No	High

4.1.4.11 (Threatened Species and Ecological Communities) Proposed offsets relevant to avoidance or mitigation measures

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	BiodiversityCreditReport (86).pdf Biodiversity Credit Report from the BDAR		Yes	High

4.3.8 Why alternatives for your proposed action were not possible

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	HTB03.13 Douglas Park EPBC Ecological Assessment Report 12.9.25.pdf EPBC Act Ecological Assessment		No	High

5.2 Declarations

Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

ABN/ACN	85624419870
Organisation name	TBE ENVIRONMENTAL PTY LTD
Organisation address	2250 NSW
Representative's name	Lindsay Holmes
Representative's job title	Ecologist
Phone	0243405331
Email	lholmes@traverseecology.com.au
Address	52 The Avenue, Kariong, NSW, 2250

Check this box to indicate you have read the referral form. *

Check this box to confirm these are the correct identification details. *

By checking this box, I, **Lindsay Holmes of TBE ENVIRONMENTAL PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	77003010320
Organisation name	BENIMA PTY LTD
Organisation address	2000 NSW
Representative's name	William Singer

Representative's job title	Project Manager
Phone	0427137126
Email	wsinger@htbuilding.com.au
Address	72 Glendower Street, Gilead, NSW, 2560

Check this box to indicate you have read the referral form. *

Check this box to confirm these are the correct identification details. *

I, **William Singer of BENIMA PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

ABN/ACN	77003010320
Organisation name	BENIMA PTY LTD
Organisation address	2000 NSW
Representative's name	William Singer
Representative's job title	Project Manager
Phone	0427137126
Email	wsinger@htbuilding.com.au
Address	72 Glendower Street, Gilead, NSW, 2560

Check this box to indicate you have read the referral form. *

Check this box to confirm these are the correct identification details. *

I, **William Singer of BENIMA PTY LTD**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.