



Your reference: Our reference: Contact: MP06_0076 Doc12/8608 Belinda Leo 9995 6820

Mr Chris King Assessment Officer Metropolitan and Regional Projects South NSW Department of Planning & Infrastructure GPO Box 39 SYDNEY NSW 2001

Department of Planning Received 1 2 MAR 2012

Scanning Room

Dear Mr King

Kirrawee Brick Pit Concept Plan - MP10_0076

I refer to your email dated 28 February 2012 seeking comments from the Office of Environment and Heritage (OEH) on the application for redevelopment of the Kirrawee Brick Pit site.

OEH has reviewed the documents supplied by the Department of Planning and Infrastructure (DoP&I). OEH considers that the proposed compensatory plantings are not suitable as offsets for the loss of Sydney Turpentine Ironbark Forest (STIF). Based on available information:

- The offset sites are numerous small remnants, with limited individual viability. The offset should be, at best, a single remnant adjacent to an existing reserve.
- The Preferred Project Report appears to indicate that much of the works will be weeding and
 planting in existing vegetation, rather than adding vegetation. As there is no additional security to
 be placed on these sites, some management of existing vegetation does not contribute to offsetting
 vegetation loss.
- Of the nominated offset sites, Willow Place and Oak Road are mapped as urban trees, not native vegetation, in the draft Sydney Metro Catchment Management Authority (SMSCA) vegetation mapping.
- Vegetation in the general vicinity of 131 Acacia Road is all mapped as urban trees. Council should confirm if this mapping is correct.
- Based on draft SMCMA mapping, 32 Kirrawee Avenue and 2R Hotham Road do not appear to be STIF. OEH recommends that offsets should be of similar vegetation to that cleared.

In addition, OEH reiterates its previous advice of 15/2/11. Specifically:

The size of the off-site offset proposed is twice that to be lost from the development site (i.e. a 2:1 ratio is proposed in Section 3.5.5 of Biodiversity Management report). OEH recommends that the offset proposal be developed further to show:

- How it addresses the Principles for the use of biodiversity offsets in NSW (see http://environment.nsw.gov.au/biocertification/offsets.htm);
- How it compares to what should be required by using Biobanking Assessment Methodology. OEH
 recommends the use of the Biobanking Assessment Methodology for the purposes of quantifying an
 appropriate offset (see http://www.environment.nsw.gov.au/biobanking/assessmethodology.htm);

- The legal mechanism to be used for securing the offset; and
- A schedule of works for the implementation of the offset for at least five years.

OEH recommends that the offset should be secured prior to the commencement of construction.

If you have any queries regarding this matter please contact Belinda Leo on (02) 9995 6820.

Yours sincerely

MONICA COLLINS

Director Conservation and Regulation Office of Environment and Heritage

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