



## Office of Environment & Heritage

Your reference  
Our reference:  
Contact:

Mp10\_0147  
Doc13/15714  
Susan Harrison  
9995 6864

Ms Karen Jones  
Director  
Metropolitan & Regional Projects South  
Department of Planning and Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Attention: Robert Byrne

Dear Ms Jones

I refer to your letter dated 11 April 2013 inviting comment from the Office of Environment and Heritage (OEH) on the Environmental Assessment for a Hi-tech Holistic Cancer and Medical Hospital Facility – 'Life City Wollongong' in Berkley, Wollongong (MP10\_0147). Specifically OEH has comment to make on the Flora and Fauna Assessment (FFA) for this proposal as well as the Bushfire Protection Assessment (BPA).

The subject site supports vegetation, most of which is heavily disturbed as a result of past land uses. However the FFA identifies an area of vegetation in the north east to south eastern part of the site (Vegetation community 1 - mixed regrowth forest /woodland in Table 1 and Figure 2) as remnant rainforest on the basis of the plant species present. OEH has reviewed the survey data for this vegetation community (Appendix 2) as well as the list of plant species recorded on the subject land (Table 2) and considers that this is a disturbed, but regenerating, remnant of the Illawarra Subtropical Rainforest Endangered Ecological Community (EEC).

This EEC is known from the Berkeley Hills and occurs on coastal Permian volcanics, which are present on this part of the site. In the Berkeley Hills, this EEC generally occurs as a dense, low scrub or brush. This remnant, like most other remnants of this EEC, is small and threatened by weed invasion. However it extends offsite into the adjoining Council reserve and is likely to have connectivity values for fauna (see below).

The Illawarra Subtropical Rainforest EEC is known to provide habitat for a number of threatened plants including *Daphnandra* sp. *C. Illawarra*, *Cynanchum elegans* and *Zieria granulata*. There are a number of nearby records for *Cynanchum elegans* in similar disturbed remnants. Flora and fauna surveys undertaken over 2 days in autumn did not locate any threatened flora or fauna. However, the FFA notes that some areas of vegetation were not accessible due to the presence of lantana. The seeds of *Cynanchum elegans* are long-lived and it is possible that if the disturbed remnant of Illawarra Subtropical Rainforest were actively managed this and other rainforest species characteristic of this EEC would regenerate.

The FFA notes the importance of maintaining the scattered patches of remnant native vegetation in the Berkeley Hills as important stepping stones for fauna movement through this area. It also states that the most diverse patch of vegetation in the south eastern corner of the site will be retained within an area of open space to be regenerated as rainforest (p. 17-18) and recommends that a Vegetation or Habitat Management Plan be prepared for this area (p. 21). However, OEH notes that Stage 1 of the proposal will remove approximately half of the Illawarra Subtropical Rainforest remnant (Appendix 24 Overall Concept

Plan), the proposed Asset Protection Zone (Appendix 24 and Table 4 of the BPA) will modify a further quarter and that the remainder will be fragmented by access tracks for bushfire maintenance, the access road and the construction of senior self-care housing together with associated on-site effluent management facilities (Appendix 17).

Given the naturally restricted distribution of this EEC together with the small size and disturbed nature of most remnants, which are also inadequately protected, OEH recommends that the footprint of the proposal be modified to maintain as a large an area of the Illawarra Subtropical Rainforest Endangered Ecological Community as possible on the site. This would mean making changes to Stages 1 and 6 of the proposal to remove buildings and associated infrastructure (roads and effluent management facilities) from the remnant and to relocate them to other more disturbed parts of the site. Internal roads could be used more effectively as part of the APZ which could be reduced in size. This would also negate the need for access tracks through the remnant. OEH also recommends that the retention, long-term active management and protection of the remnant be conditioned as part of any approval for the proposal.

If you have any queries please contact me at [susan.harrison@environment.nsw.gov.au](mailto:susan.harrison@environment.nsw.gov.au) or on 9995 6864.

Yours sincerely

*S. Harrison 26/04/13*

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