



## Office of Environment & Heritage

Your reference: MP10\_0076 MOD3  
Our reference: DOC14/21426  
Contact: Rachel Lonie, 99956837

Mr Ben Lusher  
Manager, Key Sites and Social Projects  
Department of Planning & Infrastructure  
GPO Box 39  
Sydney NSW 2001

Attention: Fiona Gibson

Dear Mr Lusher

I refer to your correspondence dated 18 February 2014 to the Office of Environment and Heritage (OEH) requesting comment on a Concept Plan Modification for the Kirrawee Brick Pit site, Princes Highway Kirrawee (MP10\_0076 MOD3). The proposed modification involves the relocation of the water features as well as a new child's playground in the south western corner of the site. The following comments are provided.

### **1. Sydney Turpentine Ironbark Forest**

The 2011 Concept Plan approval included conditions relating to the retention and offsetting for the loss of Sydney Turpentine Ironbark Forest (STIF) from the site. These were required to be identified and secured by the Proponent prior to the clearing of any STIF. The DA Landscape Statement varies from the approved Concept Plan with less apparent retained STIF in the southwest corner and a new childrens' playground in this area. It does not quantify the STIF to be retained (as identified by Cumberland Ecology in Figure 3.1 in the Flora and Fauna Assessment that supported the Concept Plan) and the STIF to be impacted as a result of this modification and how this will be offset.

OEH notes that there is no revised ecological assessment or flora and fauna report that supports the modification proposal. The Ground Floor Public Domain Landscape DA Plan that is provided does not identify any areas of retained STIF. However, comparison with the Part 3A Concept Plan Approval 03 plan and the original mapping of STIF on the site there appears to be some significant reduction in area vegetation.

OEH considers that the modification needs to quantify the STIF retention and losses and demonstrate how areas to be retained will be protected and how areas to be lost will be offset according to the agreed offset ratio and to the satisfaction of Sutherland Council who will be managing the reserve areas in the future.

## 2. Water Body

A major issue for the previous Concept Plan was the retention of a suitably sized permanent water body on the site, as it was found to be habitat for two threatened species, the Grey Headed Flying Fox and the Eastern Bentwing Bat. This needed to be managed to maintain water quality and water depth (i.e. an area not less than 800 sq metres including a 40 metre 'landing area' and be maintained according to the ANZECC Water Quality Guidelines for Freshwater Lakes and Reservoirs. OEH suggests that Department of Planning should ensure that the relocated water body will maintain water quality, size and depth as per the previous consent as well as ensure that the temporary water body is retained until the water feature is fully constructed and operational.

OEH has provided previous comments that provide more detail on these matters (copy attached). If you require further details or clarification on any matters raised in this response please contact me on 9995 6837 or by email at [rachel.lonie@environment.nsw.gov.au](mailto:rachel.lonie@environment.nsw.gov.au) (please note work days are generally Mondays, Thursdays and Fridays).

Yours sincerely

*S. Harrison 13/03/14*

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