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Our reference: DOC19/563505
Contact: Vanessa Allen
4224 4186

Casey Joshua
Senior Planner, Regional Assessments
Department of Planning & Environment

Via e-mail: casey.joshua@planning.nsw.gov.au

Dear Casey

RE: Calderwood Concept Plan Mod 5 - Submission of further information – OEH Comments

Thank you for consulting us with regard to the submission of further information for the proposed amendments to the Calderwood Concept Plan, Modification 5. The applicant previously submitted a Response to Submissions and supplementary documents which OEH provided comments (dated 18th April 2019). Since then, the applicant has submitted further information that proposes to remove a riparian/ drainage corridor between the E3 zoned land and Escarpment Drive and replace it with an alternate habitat link between the E2 zoned land and Johnsons Spur.

Our April 2019 submission noted that the previous modification largely addressed biodiversity concerns outlined in our initial letter dated 3rd April 2018.

Biodiversity impacts

We are generally supportive of the proposed removal of the riparian corridor in terms of biodiversity impacts. However, we would like to make the following comments in relation to preservation of existing vegetation on site and the proposed alternate habitat link between the E3 lands and the E2 land of the nearby Johnsons Spur. We note that several reports have been released since we provided our previous advice on this modification.

1. Subdivision plans submitted with this referral indicate that part of the E3 lands will be "cleared/managed" consistent with bushfire risk management recommendations. We do not support a subdivision design which requires the loss of the Critically Endangered Ecological Community (CEEC), "Illawarra Lowlands Grassy Woodland", and we re-iterate our previous comments that future development should be designed to "avoid clearing and minimise impacts on the retained native vegetation". This is also in accordance with the original intent of the Concept Plan in that mapped environmentally significant land will be "retained and appropriately enhanced". To achieve this, asset protection zones must occur outside the E3 zoning. This matter should be dealt with broadly in the Concept Plan approval to provide certainty for future development applications. We are happy to provide suggestions for Conditions of Consent relating to the protection of this area if required.
2. Our previous correspondence referred to our preference for a continuous vegetated biodiversity link between the E3 land and E2 land on Johnsons Spur. While the proposed design provides some

connective value, it relies on several "habitat passage ramps" and we question whether subdivision design changes could provide better connective value whilst minimising the need for multiple ramps. We also question whether the road between the "habitat enhancement area and the E2 lands of Johnsons Spur is needed as it does not provide access to any lots. Additionally, the Flora and Fauna Report states that 7 of the 15 hollow bearing trees on site are to be removed. Hollow bearing trees are a valuable resource which are not easily replaced. We recommend that further consideration be given to retaining these trees within the habitat linkage through subdivision re-design.

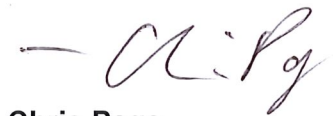
3. We understand that detailed subdivision design, including avoidance and minimisation of biodiversity impacts will be dealt with in the subdivision DA. We can provide further advice on these matters if required.

Aboriginal cultural heritage

We have no further comments to make on Aboriginal cultural heritage as we understand that impacts to known Aboriginal cultural heritage values on the site are otherwise being addressed through the subdivision development application (DA) and Aboriginal heritage impact permit (AHIP) processes.

Please do not hesitate to contact Vanessa Allen, Senior Conservation Planning Officer on 4224 4186 or via e-mail Vanessa.Allen@environment.nsw.gov.au should you have any further queries.

Yours sincerely



Chris Page
Senior Team Leader, Planning (Illawarra)
South East Region
Biodiversity and Conservation Division
Environment, Energy and Science Group