



Date: 8/8/2019
Your reference: MP 09_0082 MOD 5
Our reference: DOC19/685699
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

Thank you for consulting us regarding the submission of further information for the proposed amendments to the Calderwood Concept Plan, Modification 5. Biodiversity and Conservation Division (and the former Office of Environment and Heritage) has previously provided comments on this modification (dated 3/4/2018, 18/4/2019 and 2/7/2019). The current referral relates to further information provided by the applicant that proposes a building envelope for the E3 zone land, and includes an amended subdivision plan incorporating a conceptual Vegetation Management Plan (VMP) for the management of the E3 land, and a further supplementary bushfire report arguing the subject site will not constitute a bushfire hazard and will not require vegetation removal for the purpose of Asset Protection Zone (APZ) provision.

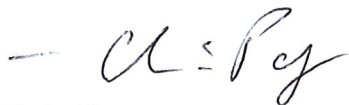
Our previous correspondence stated that we do not support a subdivision design which requires the loss of the Critically Endangered Ecological Community (CEEC), "Illawarra Lowlands Grassy Woodland". The proposed amendments to the modification application appear to mostly address this issue, however we would like to make the following recommendations:

1. That DPIE Planning and Assessment Group confirm with the Rural Fire Service that the submitted VMP meets their requirements for APZs. Confirmation that the 10/50 Vegetation Code entitlement does not apply to the subject land should also be sought as this would be inconsistent with the VMP. According to a check of the 10/50 on-line tool, the subject property is currently described as occurring within a clearing entitlement area.
2. A condition of consent enforcing the VMP and removing the 10/50 entitlement (if it applies) should be included in the modification and subdivision DA approvals.
3. The VMP indicates that a s.88B restriction will be placed on the "habitat enhancement area". This should extend to the E3 land, including "existing forest red gum to be reforested" and "managed vegetation" and be included as a condition of consent in the modification and subdivision approvals.
4. The VMP indicates that shelter plantings will be removed. The species of tree is not provided in the VMP. Any shelter plantings which are of a species which normally occurs in the Illawarra Lowland Grassy Woodland EEC should be retained.

5. The VMP should be expanded to include detailed management actions to ensure that Illawarra Lowland Grassy Woodland areas are protected for conservation purposes. It is also unclear how the "habitat enhancement area" will be managed. This should be detailed in the VMP.

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

A handwritten signature in black ink, appearing to read 'Chris Page'.

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