



Our Ref: DOC19/387091
Your Ref: Your letter dated 1/05/2019

Ms Claire Hodgson
Senior Environmental Consultant
Arcadis Australia Pacific Pty Ltd
Level 16, 580 George Street
Sydney NSW 2000

Dear Ms Hodgson

Re: Cairncross Waste Management Facility Expansion SSD 5792 Response to Submissions

Thank you for your letter dated 1 May 2019 about the Cairncross Waste Management Facility Expansion (SSD 5792) Response to Submissions seeking comments from the Office of Environment and Heritage (OEH). I appreciate the opportunity to provide input.

Your letter addresses the issues the OEH raised in our Response to Submissions letter dated 7 March 2019 regarding a vegetated buffer to the Rawdon Creek Nature Reserve (NR) and the width of the koala corridor along the southern boundary of the waste management site. It identifies why a 50m buffer was considered unnecessary given it is argued the Strategic Fire Advantage Zone (SFAZ) will adequately mitigate potential environmental impacts including visual impacts, litter, weeds, fauna habitat and water. The most recent recommendation from the OEH was that this be a minimum 10m wide buffer for both visual and ecological reasons. It is disappointing this has not been achievable.

In relation to the koala corridor, the OEH accepts that there will be an encroachment from the Stage 2 sediment basin and that this cannot be avoided due to site constraints. We note the aim of the koala corridor is to facilitate continued movement of koalas between larger patches of habitat to the east and west following removal of vegetation for the waste management facility. The need to remove understorey and shrub vegetation and continually slash and to rake under the trees in the koala corridor will mean this area has reduced value for other native species, although it is acknowledged that koalas will still be able to use it.

Your letter references the density of koala feed trees but does not quantify the proposed density. It also references pet dogs not being present with the correlation that koalas will not be impacted. Wild dogs are also a significant threat to koalas (see https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed_inquiries/2010-13/koalas/submissionsaccessibilitytrial/sub018).

As the OEH has previously commented, the impacts arising from the establishment and operation of a waste management facility, such as clearing, airborne litter, noise, vibration, runoff and lighting, may affect the NR values and could also introduce weeds and increase access to the NR by feral

animals. We previously recommended that an Environmental Management Plan (EMP), that includes a Vegetation Management Plan, should be prepared in consultation with the OEH that describes how the impacts arising from the operation of the waste management facility on the NR will be managed and mitigated to address the *OEH Guidelines for developments adjoining OEH land and water* (<http://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/development-guidelines>).

Section 2.4 of the OEH Guidelines requires consideration of the management implications relating to pests, weeds and edge effects as they relate to park management, to ensure the development does not lead to increased impacts from invasive species (weeds and pests). The fencing to the active landfill is proposed to be chain wire and only installed when the Stage 2 area is developed. Foxes have been recorded on the site (as discussed in the Biodiversity Assessment Report) and are likely to be attracted to the area given its use for landfill and that the fencing will only consist of chain wire.

The EIS stated that all relevant flora and fauna mitigation measures will be incorporated into the Operational Environmental Management Plan (OEMP). The OEMP was described as covering pest animal control measures including monitoring and trapping where necessary. It also was described as covering litter removal and removal of illegally dumped material.

The OEH recommends the Operational Environmental Management Plan (OEMP) should:

1. be prepared in consultation with the OEH;
2. include a Vegetation Management Plan (as a sub-plan) that describes how the impacts arising from the operation of the waste management facility on the NR will be managed and mitigated to address the *OEH Guidelines for developments adjoining OEH land and water* (<http://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/development-guidelines>);
3. cover all areas of vegetation to be retained, managed and zoned E2 in the future (i.e. the initial offset area to the west, the area to be established as a koala corridor on the southern boundary and the Strategic Fire Advantage Zone);
4. address management of feral animal issues (including foxes and wild dogs);
5. include a reference to the Memorandum of Understanding between NPWS, NSW Forestry and Port Macquarie-Hastings Council regarding waste management and describe how illegal dumping and litter will be managed;
6. address vehicle and track access issues to the NR as discussed in the OEH Guidelines;
7. include details of the fencing to be installed, the timing for its installation and how this will prevent access by koala and other fauna into the landfill site;
8. be provided to the OEH for review after it has been drafted.

If you have any further questions about this issue, Ms Rachel Lonie, Senior Conservation Planning Officer, Conservation and Regional Delivery, OEH, can be contacted on 6650 7130 or at rachel.lonie@environment.nsw.gov.au.

Yours sincerely



27 May 2019

DIMITRI YOUNG
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