

# Abel Ecology

Document No: 1817-LET-549

22 September 2017

Ian Malouf and Chris Biggs  
The Next Generation  
84-88 Burrows Road  
Alexandria NSW 2015

Attention: Stewart Doran

Dear Ian and Chris,

## **Subject: Report amendments required to reflect the development for Stage 1**

### **Introduction**

The Department of Planning & Environment has reviewed the Response to Submissions report and supporting documentation. In reviewing the material, the Department has noted the application has been amended to reflect development for Stage 1 only to treat a maximum of 552,500 tonnes, with Stage 2 to be subject to a future separate application.

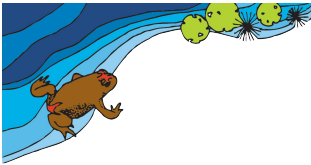
As per this amendment, the Department now requires a revised Response to Submissions report to suitably describe, justify and assess the further amendments to the application. In particular, the revised report must:

- *'be supported by an adequate detailed description of the amended proposal (including all relevant supporting plans for Stage 1 only).*
- *'have annexed to it a revised set of technical reports that quantify the impacts of the Stage 1 development only; and*
- *seek the Minister's agreement to a further amendment of the application in accordance with the EP&A Regulation.'*

### **Previous Documents from Abel Ecology**

This letter provides additional information relevant to three previous reports:

1. Flora and fauna assessment report dated 17 April 2015
2. Bushfire assessment report by Abel Ecology 13 June 2014
3. Response to letter from OEH by Abel Ecology 14 July 2017



The third document *Response to letter from OEH 14 July 2017* updates information in the *Flora and fauna assessment report 17 April 2015*. Additional information provided in this letter relevant to the proposal is that engineering drawings allow a more accurate estimate of the amount of vegetation to be cleared for the proposal.

### **Changes to the proposal**

In the letter dated 14 July 2017 it was stated that the area of River Flat Eucalypt Forest (RFEF) Endangered Ecological Community (EEC) proposed to be removed was 1.03 ha. The engineering drawings for the proposal are now available and they allow a more accurate calculation of the proposed amount of River Flat Eucalypt Forest (RFEF) to be removed. The area of RFEF proposed to be removed is now approximately 0.57 ha (See Figure 1).

Thus the current total area of EECs proposed to be cleared is comprised of 0.27 ha of Cumberland Plain Woodland and 0.57 ha of RFEF providing a combined total of approximately 0.84 ha of EECs proposed to be cleared.

As described in the letter dated 14 July 2017 the BioBanking Assessment Methodology calculated a requirement of 22.5 credits per hectare of Cumberland Plain Woodland at Kellyville. Thus using the Kellyville site as a surrogate the offset requirement for the current proposal is  $0.84 \text{ (ha)} \times 22.5 \text{ (credits/ha)} = 18.9 \text{ credits}$ . Thus 18.9 credits is the offset requirement.

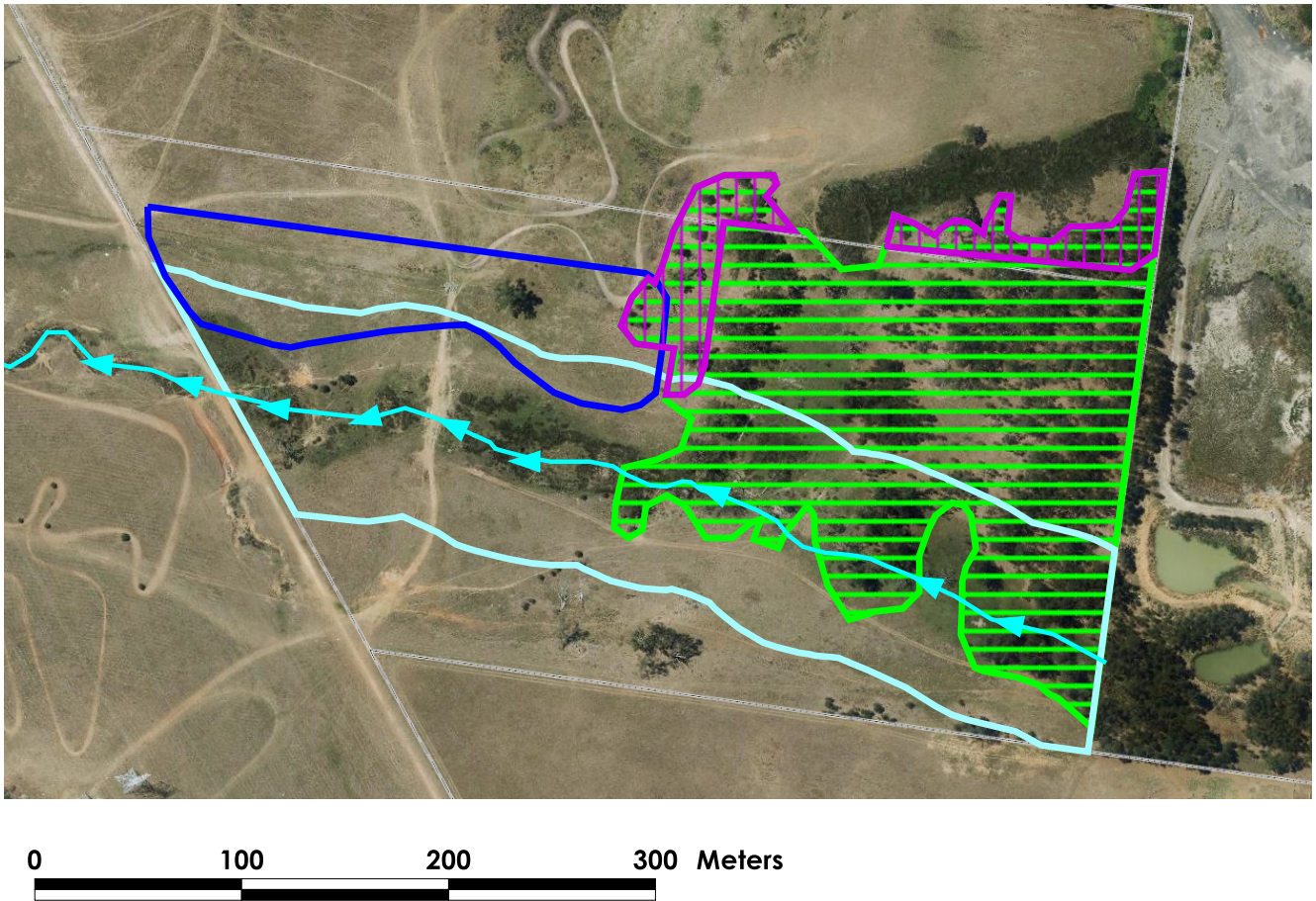
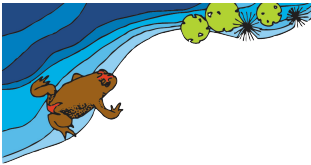
The portion of RFEF outside that riparian area has also correspondingly increased. Thus the area available of RFEF available as an on-site offset has increased.

### **Bushfire Report**



Changes to the proposal including increase retention of forest vegetation has required a new bushfire report (See Bushfire assessment report by Abel Ecology dated 19 September 2017).

Yours faithfully,

Dr Daniel McDonald  
Abel Ecology Pty Ltd



**Figure 1. Ropes Creek Tributary illustrating existing RFEF and amended proposal features**

-  Area of RFEF proposed for removal
-  Ropes Creek Tributary
-  Bio-retention basin and sides
-  Riparian area - 40m + 10 m
-  River Flat Eucalypt Forest RFEF