

We would also like to comment on both the TSC and Office of Environment and Heritage (OEH) concerns around the TIMING of dedication of lands to each of these organizations, as the conditions of consent require.

In their submission the OEH stated their concerns as:

The applicant should provide further details about how the proposed modification to the definition of 'commencement' may delay the management of the Potential Council Land and Future OEH Land for conservation purposes, and how this biodiversity loss may be addressed.

This proposed revision does not adequately explain how each stage of the development will impact on native vegetation and what provisions will be in place to allay the resulting loss of biodiversity.

This revision does provide a schedule of establishment of compensatory habitat and subsequent dedication of these lands to TSC & OEH. However, because some development precincts are associated with impact on native vegetation of much larger areas than others, it is simply not adequate to sequence compensatory habitat ahead of each new development precinct. As it is currently described the methodology will likely result in uneven biodiversity loss occurring for long periods before equivalent compensatory plantings are in place.

It is recommended by TSC staff that a methodology be used that calculates the *overall percentage of land impacted* and then use a formula to divide this by the size of each development precinct. This method would ensure that an equivalent amount of native habitat is established BEFORE clearing existing areas and that the biodiversity of the site overall is protected.

Similarly it is important that lands to be dedicated to TSC and OEH are planned in such a way that occurs **concurrently** as the development takes place, so that there is not an unacceptable time lag during which these lands may not be managed adequately, and/or new owners take over to continue the dedication process.