



DOC19/630106
MP10_0193 MOD 3 & SSD 7628 MOD 2

Ms Heather Nelson
Senior Planner, Water and Intermodal Assessments
Planning and Assessment
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Nelson

Re: Modification Request for the Moorebank Precinct East Concept Plan (MP 10_0193 MOD 3) and Moorebank Precinct East Stage 2 (SSD 7628 MOD 2)

I refer to your letter of 16 July 2019 inviting comments from the Environment, Energy and Science Group (EES) on the above modification.

EES has reviewed the Biodiversity Development Assessment Report (BDAR) supporting the proposed modification and provides the following comments:

- The flora survey was not conducted during the required season for *Hibbertia fumana*. The 3m separated transects and the open ground of the site mean that detectability should not have been an issue. However, the Biodiversity Assessment Method (BAM) requires that flowering material be present for species identification.
- The credits for *Hibbertia fumana* have been rounded to zero. However, section 11.2.3.6 of the BAM advises that 'where the total number of credits calculated for a vegetation zone by the assessor is not a whole number, the assessor is to round it to the nearest whole number using conventional rounding rules, except if the number being rounded is less than one, in which case the number of credits is rounded to one'. It is noted the BAM Credit Summary Report (Appendix B) shows the species credits is zero, however, it is assumed the calculator has not applied the BAM correctly.
- Recent biodiversity assessments of adjoining land and the Moorebank Precinct West site indicate all the vegetation mapped as PCT 883_Poor and the individual trees within PCT 883_Cleared should be considered Koala habitat and offset. The latter is consistent with other projects with scattered trees in a cleared landscape.

EES recommends the above matters be addressed in a revised BDAR.

Should you have any queries regarding this matter, please contact Richard Bonner, Senior Conservation Planning Officer, on 9995 6917 or at Richard.Bonner@environment.nsw.gov.au.

Yours sincerely

S. Harrison 13/08/19

Susan Harrison

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