



Our Ref: DOC20/221538

Your Ref: SSD-7293

Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2000

Attention: Ms Melissa Anderson

Dear Ms Anderson

RE: Sancrox Quarry Expansion Project (SSD-7293) – Further Information

Thank you for requesting advice about the Sancrox Quarry Expansion from the Biodiversity and Conservation Division (BCD) of the Environment, Energy and Science Group in the NSW Department of Planning, Industry and Environment. I appreciate the opportunity to provide further input.

The BCD provided our initial advice and recommendations about this proposal on 11 December 2019. In that response we identified, amongst other matters, that the Framework for Biodiversity Assessment (FBA) calculations had not been submitted.

Since our previous letter, the FBA calculations have been submitted and we have been liaising with Ethos Urban consultants to discuss the matters raised in relation to the proposal.

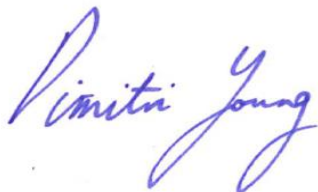
After reviewing the FBA calculations and the submitted ecological reports we can provide further detailed comments in **Attachment 1** to this letter.

In summary, the BCD recommends that:

1. Further information should be provided on indirect impacts, connectivity values, and reporting requirements of the FBA.
2. Further consideration should be given to avoiding and minimising biodiversity impacts of the proposal, particularly in relation to reducing the development footprint and bringing forward the commencement of site rehabilitation efforts.
3. The FBA calculator should be reviewed, and further justification of the results should be discussed within the Biodiversity Assessment Report.
4. Further information and justification should be provided in relation to threatened species surveys on the site and clearer conclusions presented.
5. As evidence of the koala has been previously recorded on site, the BAR should be amended calculate the required koala species credits.

If you have any questions about this advice, please do not hesitate to contact Mr Krister Waern, Senior Operations Officer, at krister.waern@environment.nsw.gov.au or 6640 2503.

Yours sincerely



3 April 2020

DIMITRI YOUNG
Senior Team Leader Planning, North East Branch
Biodiversity and Conservation

Enclosure: Attachment 1 detailed BCD Comments – Sancrox Quarry Expansion Project

Attachment 1: Detailed BCD Comments – RE: Sancrox Quarry Expansion Project (SSD-7293) – Further Information

Previous advice

The Biodiversity and Conservation Division (BCD) provided initial advice and recommendations about this proposal on 11 December 2019. We have reviewed our previous advice in relation to biodiversity, and our matters raised in relation to indirect impacts, connectivity values, and reporting requirements of the Framework for Biodiversity Assessment (FBA), still need to be addressed.

BCD Recommendation:

1. Further information should be provided on indirect impacts, connectivity values, and reporting requirements of the FBA.

Avoiding and minimising biodiversity impacts

A key consideration for any proposed development is to address the potential for biodiversity impacts to be avoided rather than addressed through mitigation or offsetting. Further justification should be provided about possible alternatives to the current development footprint which can avoid or reduce the biodiversity impacts of the proposal, particularly considering the large extent of vegetation clearing which includes the habitat of numerous threatened species.

We note that quarrying will be undertaken in stages over a long timeframe. One consideration could be to reduce the proposed development to one or more of the identified stages.

Further, it is not clear when the quarry rehabilitation phase is to commence for either the proposed new stages or the existing quarry footprint. The timing between the commencement of a next quarry stage and the rehabilitation of the previous stage needs to be made clear. Consideration should be given to bringing forward rehabilitation works on the site to address the biodiversity loss associated with the proposal.

BCD Recommendation:

2. Further consideration should be given to avoiding and minimising biodiversity impacts of the proposal, particularly in relation to reducing the development footprint and bringing forward the commencement of site rehabilitation efforts.

FBA calculations

The BCD has reviewed the FBA calculations and provides the following points for review:

- The connectivity value of the calculator should be justified in relation to the low width value (being 0-5m before and after development), and the mid storey/ground cover condition not being in benchmark condition.
- The assessment of geographic/habitat features appears to have taken a narrow view of the possible threatened species on site. If the habitat feature is present or possible on site, then the threatened species associated with that feature must be included in the assessment. For example, the habitat feature of the Milky Silkpod (*Parsonsia dorrigoensis*) includes areas of open eucalypt forest and the species should be included as this habitat feature occurs in the quarry impact area. All threatened species at this step of the calculator should be reviewed and updated.

- We note that some of the plot information is not within benchmark range. For plots 247 and 267 the overstorey cover is only 3 and 5.5 respectively. It would be expected that the Biodiversity Assessment Report (BAR) should provide justification and photographic evidence to detail these characteristics of the site. Further, the plot data shows limited regeneration of canopy species and a high measure of fallen logs. Further explanation of the plot data should be provided to explain these values. Providing a more detailed disturbance history of the site would also be useful.

BCD Recommendation:

3. The FBA calculator should be reviewed, and further justification of the results should be discussed within the BAR.

Threatened species surveys

The BCD notes that most of the threatened species surveys have been undertaken in late 2015. There is a long-held position within BCD that surveys need to be recent (within 5 years) to ensure the proposed development can be adequately assessed. The survey data for most of the species is almost five years old, and this raises issues about the adequacy of the information in the BAR particularly considering the climatic variability that has occurred in the last couple of years and the recent fires in the area.

Further, there has been no effort in the BAR to discuss the suitability of the surveys in relation to these climatic events or any attempt to compare the survey effort with the current threatened species survey guidelines. The current guidelines for surveys can be accessed at <https://www.environment.nsw.gov.au/surveys/GuidelinesForCarryingOutASurvey.htm>

Specifically, in relation to the koala, we note that it has been recorded on site as discussed in our previous correspondence. As evidence of the koala has been recorded on site, the proposal should require koala species credits.

BCD Recommendation:

4. Further information and justification should be provided in relation to threatened species surveys on the site and clearer conclusions presented.
5. As evidence of the koala has been previously recorded on site, the BAR should be amended calculate the required koala species credits.