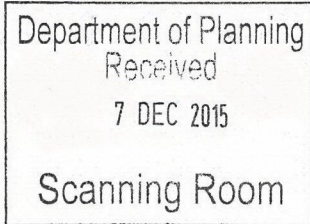




Office of
Environment
& Heritage



Our Ref: DOC15/444788; DOC15/449446
Your Ref: SSD 7036



Ms Swati Sharma
Planning Officer
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Sharma

Re: Exhibition of Coraki Quarry (SSD 7036)

Thank you for your email dated 9 November 2015 regarding the above proposal requesting comments from the Office of Environment and Heritage (OEH). I appreciate the opportunity to provide input.

The OEH has statutory responsibilities relating to biodiversity (including threatened species, populations, ecological communities, or their habitats), Aboriginal and historic heritage, National Parks and Wildlife Service estate, flooding and estuary management. The Environment Protection Authority (EPA) is no longer part of the OEH and so this response is not based on any consideration of matters relating to noise, air and water quality. If you do require information on these matters or any licensing requirements under the *Protection of the Environment Operations Act 1997* please contact the EPA separately.

We have reviewed the documents supplied and advise that, although we have no concerns about NPWS estate or flood management, a number of issues are apparent with respect to the assessments for biodiversity, and Aboriginal cultural heritage. These issues are discussed in detail in **Attachment 1** to this letter.

In summary, the OEH recommends that:

1. Further detail is to be provided about the maintenance, ongoing management, and timeframes for the sustainable management of the *Macadamia tetraphylla* and the surrounding buffer.
2. A suitable offset should be provided for the impacts to biodiversity, with preference for onsite rehabilitation of the EEC's to form part of the proposal.
3. The Environmental Management Plan should be re-written to ensure that all commitments are unambiguous.
4. The *Aboriginal cultural heritage assessment report* recommendations are implemented.

If you have any further questions about this issue, Mr Krister Waern, Senior Operations Officer, Regional Operations, OEH, can be contacted on 6640 2503 or at krister.waern@environment.nsw.gov.au.

Yours sincerely

Dimitri Young 2 December 2015

DIMITRI YOUNG
Senior Team Leader Planning, North East Region
Regional Operations

Contact officer: KRISTER WAERN
6640 2503

Enclosure: Attachment 1 – Detailed OEH Comments – Coraki Quarry (SSD 7036)

Attachment 1: Detailed OEH Comments – Coraki Quarry (SSD 7036)

Biodiversity

The OEH has reviewed the Biodiversity Assessment Report dated 23 October 2015 and provides the following comments:

- We note the presence of four *Macadamia tetraphylla* on the site which are listed as threatened species under both state and commonwealth legislation. It is proposed to protect these plants on site and provide a 25m buffer. These plants and the buffer are located with the proposed stockpile area. It is unclear how this area will be managed sustainably into the future. The management of the plants and the buffer area should include the rehabilitation of other suitable rainforest plants and weed control to provide suitable habitat for flora and fauna and reduce indirect impacts.
- The proposal has documented the direct impacts to biodiversity and the potential future impacts associated with the operational phase. These impacts include the removal of native vegetation and reduction in koala food trees. Also, the increase in site activity may have ongoing indirect impacts to biodiversity surrounding the site. Although the biodiversity impacts are low, the proposal should provide a suitable offset to ensure biodiversity values are improved or maintained.
- We note that three Endangered Ecological Communities (EEC) occur on the property in a degraded condition adjacent to the proposed stockpile area. These areas would provide an ideal opportunity for rehabilitation and provide a suitable offset for the biodiversity impacts of the proposal. The rehabilitation and natural regeneration would increase species diversity and has the potential to provide habitat for a range of threatened species. The biodiversity benefit of rehabilitating these areas would be preferred to other mitigation measures such as installation of nest boxes and the regular monitoring of road kills as detailed in the Environmental Management Plan (EMP).
- The EMP details management plans for twelve environmental considerations, including for threatened species, fauna and flora, weeds, and cultural heritage. The EMP has many non-committal references to proposed mitigation measures such as 'as soon as possible', 'consideration should be given', and 'should'. All of these loose statements make it difficult to assess the current management plans and how effective they will be in mitigating impacts.

Recommendations

1. Further detail is to be provided about the maintenance, ongoing management, and timeframes for the sustainable management of the *Macadamia tetraphylla* and the surrounding buffer
2. A suitable offset should be provided for the impacts to biodiversity, with preference for onsite rehabilitation of the EEC's to form part of the proposal.
3. The Environmental Management Plan should be re-written to ensure that all commitments are unambiguous.

Aboriginal Cultural Heritage

The OEH has reviewed the *Aboriginal cultural heritage assessment report, Coraki Quarry, Seelems Road, Coraki, NSW* (30 September 2015) prepared by New South Wales Archaeology Pty Ltd to support the development application and provides the following comments.

We note the report indicates the known Aboriginal object within the project area is within an existing indigenous heritage non disturbance zone and will be avoided by the proposal. We also note the field assessment identified a sensitive archaeological landform within the project area but no additional Aboriginal objects within the proposed area of impact.

Based on the information provided, the OEH supports the implementation of the report recommendations being conditioned into any Department of Planning and Environment approval to provide adequate contingencies to manage Aboriginal cultural heritage values within the area. In particular, we support the recommendation to protect the known Aboriginal object and the sensitive archaeological landform through the mechanism of an Aboriginal heritage management plan developed by an archaeologist in consultation with the registered Aboriginal party and the OEH.

Recommendation

4. That the *Aboriginal cultural heritage assessment report* recommendations are implemented.