



Office of
Environment
& Heritage

Our Ref: DOC15/284863
Your Ref: DA 6324

Ms Kate MacDonald
Team Leader, Industry Assessment
Department of Planning and Environment
kate.masters@planning.nsw.gov.au

Attention: Kate Masters

Dear Ms MacDonald

Bringelly Business Hub

I refer to your letter received by the Office of Environment and Heritage (OEH) on 20 July 2015 requesting comments on the Response to Submissions for Bringelly Business Hub.

OEH has reviewed the relevant documents provides comments at Attachment 1.

If you have any queries regarding these comments then please contact Belinda Leo, Operations Officer, on 9995 6820.

Yours sincerely

S. Harrison 17/08/15

SUSAN HARRISON
Team Leader, Planning
Regional Operations

Contact officer: BELINDA LEO
9995 6820

Attachment 1

Aboriginal Cultural Heritage

OEH raised issues in a previous submission dated 27 February 2015. OEH notes that the issues raised have been addressed through the provision of a letter report which outlines proposed further historic and Aboriginal archaeological assessments and consultation with the Aboriginal community. The Aboriginal Cultural Heritage Assessment should address the requirements of the Secretary's Environmental Assessment Requirements. Please note, that OEH wishes to re-iterate that no Aboriginal Heritage Impact Permit will be required at any stage for this project.

Biodiversity

The issues raised by OEH in its submission dated 27 February 2015 have now been adequately addressed. Namely, a Biodiversity Offset Strategy (Eco Logical Australia [ELA] 2015) has been provided as an addendum to the Flora and Fauna Assessment (ELA 2014) and details: additional targeted flora surveys; ecosystem credit requirements based on on-site BioBanking Assessment Methodology (BBAM) surveys; the proposed purchase and retirement of equivalent ecosystem credits from an already registered Western Sydney Parkland Trust BioBanking site; and, distinguishes between already certified (Biodiversity Certification Order for the Sydney Region Growth Centres) and non-certified lands within the study area. ELA has also provided an 'expert report' to justify the absence of *Pultenaea pedunculata* in accordance with section 6.6.2 of BBAM and Framework for Biodiversity Assessment.

OEH notes the following:

1. Section 1.1 of both the Biodiversity Offset Strategy (BOS) and expert report has the certified/non-certified impact areas the wrong way around (but are correct within other sections of the documents).
2. Under the *ecosystems credit summary* heading of the BioBanking Credit Report, the areas of Plant Community Type (PCT) for derived native shrubland and scattered paddock trees (i.e. 0.39 ha) show as not a Red Flag. However, the PCT is a Critically Endangered Ecological Community and according to Tables 2 and 3 of the BOS, is not in low condition (i.e. is in moderate to good condition). Therefore this area of PCT is expected to show as a Red Flag. There may have been a data entry error into the credit calculator or perhaps Tables 2 and 3 are incorrect in the 'condition' column. OEH suggests clarifying the total area of Red Flag to be impacted prior to preparing a Red Flag variation in accordance with BBAM.

END OF SUBMISSION