



Office of
Environment
& Heritage

Your reference: 05_0157
Our reference: DOC13/68887
Contact: Rachel Lonie, 99956837

Mr Chris Ritchie
Manager – Industry
Development Assessment Systems and Approval
Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Attention: David Mooney

Dear Mr Ritchie

I refer to your correspondence dated 2 October 2013 to the Office of Environment and Heritage (OEH) inviting comment on the Preferred Project Report for the building and construction of a Waste Recycling Facility at Moorebank (05_0157) in the Liverpool Local Government Area.

OEH previously commented on this proposal in correspondence dated 5 April 2013. Comments on the Preferred Project Report are provided in Attachment 1.

If you require further details or clarification on any matters raised in this response please contact me on 9995 6837 or by email at rachel.lonie@environment.nsw.gov.au (please note work days are generally Mondays and Wednesdays).

Yours sincerely

S. Harrison 04/11/13

SUSAN HARRISON
Senior Team Leader Planning
Greater Sydney
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ATTACHMENT 1

OEH comment on the Preferred Project Report for the building and construction of a Waste Recycling Facility at Moorebank (05_0157) in the Liverpool Local Government Area.

1. Flood Risk Management

OEH has reviewed *Volume 1 – Main Report – Preferred Project Report for the Materials Recycling Facility* and considers that the earlier floodplain risk management comments have been satisfactorily considered in sections 2.10, 2.15 and 3.2.1 of the report.

2. Aboriginal heritage

It is noted no Aboriginal cultural heritage assessment, as recommended by OEH, has been undertaken. As the appropriate regulatory authority DP&I will be required to advise on appropriate measures for any object(s) that are uncovered or disturbed as a result of the works. However, it is noted that should this event occur, notification to OEH is required under S89a of the *National Parks and Wildlife Act 1974* to ensure that the object(s) is appropriately registered on the AHIMS database.

3. Biodiversity

OEH notes that the report considers two alternatives for offsetting the impacts arising from the removal of 0.27 ha of River Flat Eucalypt Forest (RFEF) as a result of the road bridge across Lot 309. It concludes that the impacts will be offset by purchasing and retiring 9 ecosystem credits of the appropriate type. This is not however reflected in the draft Statement of Commitments.

OEH strongly recommends that this offsetting arrangement be required as a condition of consent and that the timeframe for the purchase and retirement of the credits be prior to any works on the site commencing.

The mitigation measures for the road bridge as listed on page 3-35 should also be incorporated into requirements in the Environmental Management Plan (EMP).

It is also recommended that the EMP be expanded to include a subsection on vegetation management for the entire site to ensure that all native vegetation to be retained is appropriately fenced off and protected both during construction and operation of the facility. This should include the area of Ironbark Open Forest on the south western boundary and along the batter wall to create a barrier along the eastern edge where the cleared area adjoins native vegetation.

It is noted that this vegetation is mapped as River Flat Eucalypt Forest (RFEF), Swamp Oak Forest and Coastal Saltmarsh in the draft Sydney Catchment Management Authority vegetation mapping (see map extract in Figure 1). All three are endangered ecological communities (EEC) under the *Threatened Species Conservation Act 1995*.

The EMP should also include requirements to protect the area of Gravel Transition Forest (also an EEC) as mapped along the south of the site and that is outside the area of earthworks. Note that this mapping identifies the area of Ironbark Open Forest discussed above as RFEF.

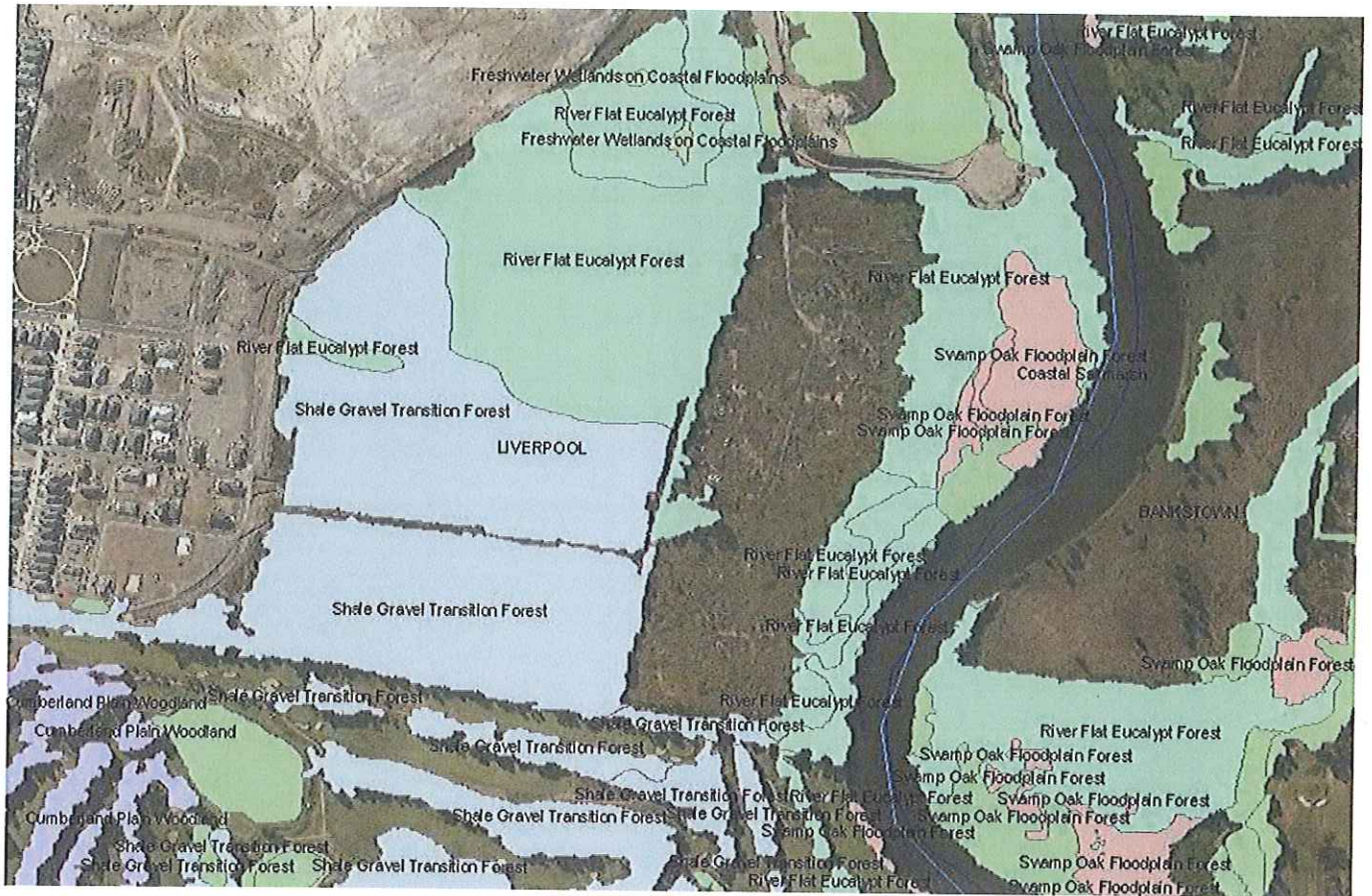


Figure 1. Map extract from the draft *Sydney Catchment Management Authority Vegetation Mapping* (v2 2013) showing mapped extent of endangered ecological communities.

