

# Attachment 6

## Campbelltown City Council - Airds Bradbury - Stage 2 DA - comments in relation to BMP and biodiversity

| Comments                                                                                                                                                                                                                                                                                                                                    | Discussion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Action                                                              |
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| Securing the biodiversity offsets in perpetuity should require the Deeds of Agreement to be registered against the title of the lands involved, a position endorsed by OEH in previous correspondence                                                                                                                                       | Office of Strategic Lands (OSL) have confirmed this is possible. Council would need to confirm acceptance on their land.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Campbelltown Council to confirm if this is required and acceptable. |
| Concern at limited time frame for ongoing management of offset areas (2 and 5 years) and that improvements will be soon lost if works cease at these times                                                                                                                                                                                  | <p>A 5 year maintenance program has been agreed to by Campbelltown Council for all reserves within the Airds Bradbury Urban Release area in partnership with Urban Growth NSW.</p> <p>It is achievable to make significant improvements in the quality of the vegetation in the reserves and to stabilise over 5 years through targeted weed control and revegetation works. At that stage the reserves will be in a maintenance phase ready to be handed over to Council control. It is expected that the reserves will continue to regenerate significantly with low levels of input.</p> <p>Contingency measures are in place to ensure that urgent works are undertaken prior to the completion of the second year of maintenance to ensure that the bushland reserves receive final works subject to the performance of the initiation revegetation and regeneration works.</p> <p>Through fencing, revegetation and weed clearing/management. The signed deeds include a condition target for the land owner to maintain the sites as per the BMP into perpetuity.</p> | No further Action required                                          |
| The BMP does not satisfy the condition of consent within Schedule 4 of the concept approval that required the BMP to be consistent with the letter from OEH to Council dated 23 December 2011. They point to insufficient funds to implement the BMP over time so that it satisfies the actions endorsed by Council in the Cumberland Plain | NSW Housing has agreed to a 5 year maintenance program including funding allowances.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | No further Action required                                          |

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| <p>Recovery Plan</p>                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>Recognises the role of the Feds in administering the EPBC Act and notes that work can't commence until EPBC approval is achieved</p>                                                               | <p>Clearing that affects all or in part a Cumberland Plain Woodland (CPW) vegetation patch of 0.5ha or greater and does not meet the criteria of 'low condition' is referable under the EPBC Act.</p> <p>Clearing of Shale/Sandstone Transition Forest (SSTF) vegetation irrespective of patch size is also referable under the EPBC Act if it is considered to be a significant impact in accordance with the EPBC Act significance assessment criteria.</p> <p>The proposed clearing of CPW and SSTF vegetation for the Airs Bradbury Urban Renewal Area has been determined as a 'controlled action'. Supplementary information has been submitted the Environment Australia is currently being assessed. Any works that do not impact on CPW or SSTF vegetation within the Airs Bradbury Urban Renewal Area is not subject to the controlled action and is not subject to EPBC approval.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>Claims that the koala habitat assessment within the ecological assessment report and the BMP are at odds with information held by UWS that indicates much higher numbers of reported sightings</p> | <p>Whilst the additional records inform the movement patterns across the Airs Bradbury Urban release area and beyond, field survey and assessment has been undertaken considering current site evidence. We recognise that several additional records may exist in the locality just as a single Koala may be recorded on a daily basis.</p> <p>Regardless of this, the assessment outcomes will not likely change unless records may demonstrate repeated utilisation of the habitat contained within the subject site itself which is unlikely based on Atlas records and survey to date by Travers bushfire &amp; ecology (2012), Hayes Environmental (2011) and the Australian Museum Business Services (AMBS) (2001 &amp; 2002). It is expected that Koalas will undergo periods of dispersal, particularly such as young males, in which the linear habitat along the Georges River may press Koalas across busy roads and periodically into the existing urban landscape.</p> <p>The report recognises the importance of both of these trees species within Section 4.3.4.(c) Other Koala Considerations following the SEPP 44 assessment. The report recognises the suitability of habitat present within the subject site by presence of <i>E.punctata</i> as well as other feed trees for Koala but indicates that this habitat is not likely utilised as part of core home ranges. <i>E.agglomerata</i> was not recorded present within the subject site during survey and if present would only be in small numbers. This will not however change the consideration of suitability</p> |
| <p>List of koala feed trees should rate <i>E.punctata</i> and <i>E. agglomerata</i> first and second (if this has not already been done)</p>                                                          | <p>Source Data from Campbelltown Council</p> <p>This has already been addressed. No further action required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| <p>Pile burns are recommended as part of rehab works but apparently such burns are not allowed in Campbelltown (refer Part 1 Schedule 8 of the PoEO (Clean Air) Regulation 2010)</p> <p>Still seeking clarification as to who is responsible for the preparation of Plans of Management for each area and the timing of preparation</p> | <p>based on tree species presence.</p> <p>Accepted</p> <p>A Bushland Management Plan has been prepared for each site within the Airds Bradbury as one document. The plans of management to be established for each reserve assumes that Campbelltown Council will be responsible for management of the reserves after the 5 year maintenance program has been implemented. The Plan of Management is pursuant to the requirements under the Local Government Act and Council is legislatively responsible to ensure the PoM's are prepared and implemented.</p> | <p>Amend the Bushland Management Plan.</p> <p>Recommend that POM's are jointly prepared with Campbelltown Council to ensure offset targets are met under the TSC Act and the EPBC Act.</p> |
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