

19 October 2020

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Response to Council's Request for Further Information for DA0563/2019 in relation to Biodiversity Issues

Dear Sirs,

As you are aware, Cumberland Ecology prepared a Biodiversity Development Assessment Report (BDAR), dated 10 October 2019, to accompany a Development Application (DA) for the proposed development of an eco-tourism resort (DA0563/2019) at 71 Fig Hill Lane, Dunmore, also known as Lot 3 DP 717776 (the 'subject property').

Following the submission of the DA documentation, a request for further information was received from Senior Development Assessment Officer James Douglas (dated 8 January 2020), on behalf of Shellharbour City Council (Council), listing a number of issues for which additional information was required in order for Council to progress the assessment of the DA.

In response to Council's request for further information, Cumberland Ecology prepared a response letter (dated 27 March 2020) addressing each of the issues relevant to biodiversity, including clarification relating to the Biodiversity Stewardship Site that is proposed to be established within the remainder of the subject property. This response letter is hereafter referred to as 'response letter 1'. A draft Vegetation Management Plan (draft VMP), dated 27 March 2020, was also prepared and submitted as part of the response documentation to Council.

We understand that an additional request for further information has recently been received via email from Mr Douglas, on behalf of Council, outlining several points for which additional information is required in order for Council to finalise the assessment of the DA.

The purpose of this letter is to provide additional information in response to Council's latest request for further information, dated 29 September 2020. We have considered the

request and the issues that are specifically related to biodiversity and have provided responses to each of the relevant issues within subsequent sections of this letter.

This letter should be read with due reference to Cumberland Ecology's BDAR, response letter 1 and draft VMP.

1.1. Response to Council Request for Additional Information

This section provides direct responses to Council's request for additional information in relation to points 4, 5a-c and k, and 10 of Council's email, in relation to biodiversity. The relevant points from Council's email are reproduced below in italics, followed by a response in plain text and marked as 'CE Response'.

1.1.1. Council Point 4

To enable the development to facilitate the interconnection provision Clause 5.13 of the LEP, a letter of intent/offer between the BCT and Applicant is to be submitted to Council that identifies the intention of the Applicant to enter the subject site under a biodiversity stewardship agreement.

CE Response:

Based on recent communication with the BCT, as part of their role the BCT is not able to provide a letter of intent/offer that identifies the intention of the Applicant to enter the subject property under a Biodiversity Stewardship Agreement (BSA) (email correspondence provided in **Appendix A**).

Nevertheless, as part of this initial correspondence with the BCT, the Applicant has clearly stated the intent of establishing a Biodiversity Stewardship Site on their site. Furthermore, an accredited assessor from Cumberland Ecology has previously undertaken preliminary studies of the entire extent of the proposed Biodiversity Stewardship Site, including vegetation mapping and Biodiversity Assessment Method (BAM) plot sampling. The Applicant has also undertaken a preliminary check of the due diligence requirements that are part of a BSA application. No impediments for establishing a Biodiversity Stewardship Site within the subject property have been detected throughout this process.

It is recommended that the intent to establish a Biodiversity Stewardship Site within the majority of the remainder of the subject property is included in future Consent Conditions associated with the DA for the project.

1.1.2. Council Point 5 a-c and k

The Southern Regional Planning Panel (SRPP) within briefing 3rd March 2020 had the following matters which were identified for discussion:

(a) BDAR/offsetting

CE Response:

A BDAR was prepared on a precautionary basis for the proposed development and submitted with the DA. The BDAR was prepared in accordance with the requirements of the BAM and includes calculations of the offsetting liability associated with the proposed development. Based on the calculations outlined in the BDAR, the removal of native vegetation within the subject land requires a total of three (3) ecosystem credits to be offset,

comprising one (1) credit of PCT 838 and two (2) credits of PCT 1300. The assessment in the BDAR also calculated an offsetting liability for two species credits for the Southern Myotis, based on assumed presence.

The biodiversity offsetting liability for the project will be completely satisfied in accordance with the options available under the Biodiversity Offset Scheme's offset rules, as outlined in the *Biodiversity Conservation Regulation 2017*.

(b) Stewardship agreement

CE Response:

Details in relation to the proposed Biodiversity Stewardship Site, including identification of a preliminary boundary, has previously been provided in response letter 1. The establishment of a Biodiversity Stewardship Site under a BSA will provide protection and management of the retained biodiversity values within the wider subject property in perpetuity.

(c) APZ's – issues with access roads and amount of clearing

CE Response:

The clearing of vegetation required for the establishment of the APZs have been addressed and accounted for in the BDAR. There is no additional clearing proposed for access roads, as these roads already exist.

(k) Impact on the SEPP 14 wetlands from effluent disposal

CE Response:

The potential impact from the proposed development, including effluent disposal, on the Coastal Wetland mapped under the *State Environmental Planning Policy (Coastal Management) 2018* (Coastal Management SEPP) has been addressed in detail in Section 8.4 of the BDAR, with relevant mitigation measures outlined in Chapter 9. Further information relating to impacts on the Coastal Wetland was also provided in response letter 1.

No areas of the Coastal Wetland will be directly impacted by the proposed development. The potential for indirect impacts will be managed through the implementation of appropriate mitigation measures, such as erosion and sedimentation control measures, a detailed stormwater design, and a comprehensive wastewater management system. Further details on the wastewater management system is provided in the Wastewater Management Plan prepared by Martens Consulting Engineers in 2019, which was submitted with the DA documentation.

The quality of water entering the Coastal Wetland is expected to be equal or improved beyond current conditions, due to the improved active management of stormwater run-off and wastewater management proposed as part of the project.

1.1.3. Council Point 10 a-d

The following matters relating to the Cumberland Ecology Report will need to be addressed:

(a) The BDAR has not addressed the Biodiversity Values Map (BV Map). Please provide an overlay of the BV Map and the development footprint in the BDAR

CE Response:

A map of the BV Map in relation to the subject land (development footprint) has been provided in **Figure 1** of this letter. No areas mapped on the BV Map occurs within the subject land. Nevertheless, a BDAR was still prepared for the DA as a precautionary approach, due to the proximity of the proposed development to the Coastal Wetland mapped under the Coastal Management SEPP and TECs.

(b) Please provide a map overlay of the Inner and Outer Protection APZ's, location of Fire Trails and their clearing and maintenance requirements in the BDAR

CE Response:

For the purpose of the preparation of the Bushfire Protection Assessment (ABPP 2019), which was submitted with the DA documentation, Australian Bushfire Protection Planner Pty Ltd (ABPP) confirmed the APZ requirements for the project with the NSW Rural Fire Service (RFS). The RFS accepted that the predominant vegetation surrounding the proposed development is 'rainforest' and therefore accepted the Short Fire Run calculated width of the APZs. The APZs prescribed in the Bushfire Protection Assessment (ABPP 2019) are based on the full width being managed as an Inner Protection Area (IPA), and not split into an IPA and Outer Protection Area (OPA).

The RFS document 'Planning for Bushfire Protection 2019' permits splitting the APZ into an IPA and OPA for 'forest' vegetation where typically the width of the APZ is greater than 67 m. In the case of the proposed development, the APZ width is 38 m, hence to provide adequate safety the entire APZ will be managed as an IPA. If the APZ was instead split into an IPA and OPA, the allowable width of the OPA (for a slope of >15 degrees) is 20 m, which would only leave 18 m for regular management of an IPA.

The location of the APZ, which will be managed as an IPA, and the location of the fire trail/maintenance access track is shown in **Figure 2**. The entire APZ is located within the subject land. The proposed maintenance access track overlaps with an existing cleared track along the eastern boundary of the subject land.

The clearing and maintenance requirements are dealt with in detail in the Bushfire Protection Assessment (ABPP 2019), and was submitted as part of the DA documentation.

(c) The BAM Credit Summary Report (APPENDIX C, Cumberland Ecology Oct 19 BDAR) provides a column for Serious and Irreversible Impacts (SAIL), however Illawarra Subtropical Rainforest has not been listed and should be revised so the SAIL determination process can be completed. In addition please include the Illawarra Subtropical Rainforest as a SAIL and discuss why meet this vegetation communities is listed as such

CE Response:

The SAIL column in the BAM Credit Summary Report is automatically populated in the online BAM calculator (BAM-C), based on the information held within the Threatened Biodiversity Database Collection (TBDC). It is currently not possible for an accredited assessor to manually assign a PCT as SAIL in the BAM-C.

At the time of the completion of the BDAR and associated BAM credit calculations for the DA, dated October 2019, Illawarra Subtropical Rainforest was not included as a candidate SAIL entity in the BAM-C or the TBDC, hence the TEC is not shown as an SAIL in the BAM Credit Summary Report provided in Appendix C of the BDAR.

Based on the general notes provided in the TBDC for Illawarra Subtropical Rainforest TEC, the BAM-C was updated in early 2020 to display the SAIL addition. The notes also refer to the TEC being identified as an SAIL on the basis that it aligns with the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) critically endangered Shoalhaven Subtropical Rainforest of the Sydney Basin Bioregion TEC. It should be noted that the occurrence of the Illawarra Subtropical Rainforest TEC that is proposed to be cleared as part of the DA is a degraded form of the community and does not conform to the EPBC Act listing.

Nevertheless, to assist with Council's SAIL determination process, an assessment of the Illawarra Subtropical Rainforest as a potential SAIL has been included in **Appendix B**. With the implementation of the proposed mitigation measures and the biodiversity offsetting, outlined in the BDAR and the VMP, it is considered the removal of ~0.17 ha of the degraded form of Illawarra Subtropical Rainforest TEC within the subject land is unlikely to result in a significant and irreversible impact to the TEC.

(d) Figure 15 – Plan of Asset Protection Zones within the Australian Bushfire Protection Planner Pty Ltd September 2019, Bushfire Protection Assessment, is to be overlayed with the vegetation layer within the BDAR to demonstrate that the clearing for APZ requirement is consistent with the BDAR, the overlay is to include Inner and Outer Protection Zones and the Maintenance Access Track

CE Response:

As outlined in the response to point 10 (b), the entire APZ will be managed as an IPA. The locations of the APZ and associated track are shown in **Figure 2**. The clearing for the APZ requirement is consistent with Figure 15 of the Bushfire Protection Assessment (ABPP 2019).

If you have any queries, or would like further information, please do not hesitate to contact me on (02) 9868 1933.

Yours sincerely,



Cecilia Eriksson Pinatacan
Senior Project Manager/ GIS Specialist
cecilia.eriksson@cumberlandecology.com.au

APPENDIX A :

BCT Email Correspondence

From: [Joe May](#)
To: [Cecilia Eriksson](#)
Cc: [Michelle Cox](#); [Tuesday Heather](#)
Subject: RE: Establishing a BSA
Date: Friday, 9 October 2020 4:00:17 PM
Attachments: [image004.png](#)
[image001.png](#)

Hi Cecilia,

Thank you for the email.

At this stage, the BCT's role would not be to provide a letter of intent/offer that identifies the intention of the Applicant to enter the subject site under a Biodiversity Stewardship Agreement. As discussed, due diligence checks and searches to inform eligibility are the responsibility of the landholder and the accredited assessors.

The following link provides further detail regarding this process:

<https://www.bct.nsw.gov.au/sites/default/files/2020-06/BSA%20Application%20Supporting%20Documents%20Guide.pdf>

I hope this information is sufficient for your purposes. However, I have cc'd in Tuesday Heather [REDACTED] who can provide you with further information if needed.

Kind regards,

Joe

Joe May
Project Officer
NSW Biodiversity Conservation Trust
M [REDACTED] W www.bct.nsw.gov | [Who is the BCT?](#)
Level 2, Honeysuckle Drive, Newcastle NSW 2000



The NSW Biodiversity Conservation Trust acknowledges the Traditional Custodians of Country throughout NSW and recognises their ongoing connection to land, waters and culture. We pay our respects to their Elders past, present and emerging and seek to genuinely and collaboratively engage with Aboriginal people in the delivery of our private land conservation programs.

From: Cecilia Eriksson [REDACTED]
Sent: Friday, 9 October 2020 1:40 PM
To: Joe May <[REDACTED]>
Cc: Michelle Cox [REDACTED]
Subject: RE: Establishing a BSA

Hi Joe,

Thanks for taking my call just then.

As discussed, my client is wanting to set up a Stewardship site on 71 Fig Hill Lane, Dunmore (the majority of the site excluding the most northern part where the existing development occurs). As part of their DA for an Eco-tourism resort, proposed at the location of the existing building, they are offering to set up most of the remainder of the site under a BSA.

As part of the assessment process, Shellharbour City council has requested the following:

To enable the development to facilitate the interconnection provision Clause 5.13 of the LEP, a letter of intent/offer between the BCT and Applicant is to be submitted to Council that identifies the intention of the Applicant to enter the subject site under a biodiversity stewardship agreement.

As mentioned, if you would be able to comment in writing if this is something that you could provide or any comments on the suitability of the site for a BSA that would be much appreciated.

Kind regards,

Cecilia Eriksson Pinatacan | Senior Project Manager/GIS Specialist

Cumberland Ecology | Sydney - Brisbane

t 02 9868 1933

e cecilia.eriksson@cumberlandecology.com.au

Cumberland Ecology wishes to advise all our valued clients and consultants that we will continue to operate our business as usual, continuing field surveys and reporting. We have taken appropriate steps to minimise the spread of Covid-19 and so the majority of our staff are now working remotely from the main office. As a further precaution, we are relying on phone/video conferencing and emailing *in lieu* of face to face meetings.

From: Michelle Cox <[REDACTED]>

Sent: Friday, 9 October 2020 1:21 PM

To: Cecilia Eriksson <[REDACTED]>

Cc: Joe May <[REDACTED]>

Subject: Establishing a BSA

Hey Cecilia

I believe you contacted the BCT about a client seeking to establish a BSA in relation to a DA? I tried to give you a call but you were already on the phone. Can I ask you to contact Joe May (cc'ed on this email) or [REDACTED] who will help address your enquiry.

Kind regards

Michelle



**Biodiversity
Conservation
Trust**

Dr Michelle Cox
A/Manager
Biodiversity Offsets Program
Programs Branch

T [REDACTED]
W www.bct.nsw.gov.au

Please note I work Wednesday - Friday and job share with Holly Park. On Monday - Tuesday please contact Holly on 9995 6741 or at holly.park@bct.nsw.gov.au

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

APPENDIX B :

SAll Assessment – Illawarra Subtropical Rainforest



B.1. Impacts on Serious and Irreversible Impact Entities

This assessment relates to the Serious and Irreversible Impact (SAIL) entity Illawarra Subtropical Rainforest in the Sydney Basin Bioregion and has been prepared in response to point 10 c of Council's request for further information email. The terminology used in this assessment is the same as in the BDAR prepared for the DA.

The SAIL entity, Illawarra Subtropical Rainforest in the Sydney Basin Bioregion Threatened Ecological Community or 'Illawarra Subtropical Rainforest TEC' will be impacted by the project. This community is represented by one Plant Community Type (PCT) within the subject property - PCT 1300. The location of Illawarra Subtropical Rainforest TEC in relation to the subject land is shown in **Figure 3**. Approximately 0.17 ha of the TEC will be removed within the subject land, comprising a degraded form of the community, which is listed under the BC Act. A further 1.29 ha of the TEC occurs in the subject property, comprising ~0.23 ha of an intact form of the community that conforms to both the BC Act and EPBC Act listing of the TEC, as well as ~1.06 ha of the degraded form that is listed under the BC Act.

Section 10.2.2 of the Biodiversity Assessment Method (BAM) requires the provision of additional information regarding SAIL entities that are TECs. The additional information is required to assist the consent authority to evaluate the nature of an impact on a potential entity at risk of a serious and irreversible impact. The additional information requirements are shown as italicised text below, with responses supplied beneath in plain text. The information presented below indicates that the project is unlikely to result in a significant and irreversibly impact to the TEC.

(a) the action and measures taken to avoid the direct and indirect impact on the potential entity for an SAIL

The actions and measures taken to avoid impacts to Illawarra Subtropical Rainforest TEC, as described in Section 7.1 of the BDAR, include amendments to the location of building footprints, reducing the size of the overall development footprint by reconfiguring the design and layout of the resort, and situating the project predominantly in previously cleared, exotic dominated grassland areas. Mitigation measures proposed to be undertaken during construction and operation have also been designed to minimise indirect impacts to the retained area of Illawarra Subtropical Rainforest TEC within the subject property.

(b) the area (ha) and condition of the TEC to be impacted directly and indirectly by the proposed development. The condition of the TEC is to be represented by the vegetation integrity score for each vegetation zone

Approximately 0.17 ha of degraded Illawarra Subtropical Rainforest TEC will be directly impacted within the subject land. The areas of the TEC to be impacted are primarily located at the edge of the subject land. A further 1.29 ha of Illawarra Subtropical Rainforest TEC will remain within the subject property and may be indirectly impacted by the project.

Within the subject land, the Illawarra Subtropical Rainforest TEC has a current vegetation integrity score of 26.1. The vegetation integrity score has been based on the BAM plot undertaken for the relevant vegetation zone. It should be noted that, due to the small area of the vegetation zone for the TEC that occurs within the subject land, the relevant BAM plot for Illawarra Subtropical Rainforest was undertaken outside of the subject land, but within the same patch of the relevant vegetation zone. Nevertheless, the vegetation integrity score

of 26.1 is considered to be representative of both areas that will be directly impacted in the subject land as well as areas that may be indirectly impacted within the wider subject property.

(c) a description of the extent to which the impact exceeds the threshold for the potential entity that is specified in the Guidance to assist a decision-maker to determine a serious and irreversible impact

There is currently no defined threshold for this SAI entity. No thresholds are currently defined for TECs within the Sydney Basin IBRA bioregion and Cumberland Ecology understands that the Environment, Energy and Science group does not intend to determine any of these thresholds at the current time.

(d) the extent and overall condition of the potential TEC within an area of 1000ha, and then 10,000ha, surrounding the proposed development footprint

Within an area of 1,000 ha surrounding the subject land, ~25.33 ha of Illawarra Subtropical Rainforest TEC is mapped as occurring. This was derived using a combination of the following broad scale vegetation mapping projects:

- DPIE (2015). South East Local Land Services Biometric vegetation map, 2014. VIS_ID 4211.; and
- DPIE (2011). Southeast NSW Native Vegetation Classification and Mapping – SCIVI. VIS_ID 2230.

The condition of the TEC within an area of 1,000 ha surrounding the subject land is expected to be in a similar condition to that within the subject land and subject property based on the similarity of land uses with variation of condition existing within these areas.

Within an area of 10,000 ha surrounding the subject land, ~604.72 ha of Illawarra Subtropical Rainforest TEC has been mapped. This was derived using the aforementioned mapping projects clipped to include a 10,000 ha area surrounding the subject land. The condition of the TEC within an area of 10,000 ha surrounding the subject land would be variable, with occurrence ranging from higher quality remnants, such as several larger patches west of Princes Highway, to areas likely to contain smaller degraded remnants in the northern and southern extent of the 10,000 ha area. The extent of Illawarra Subtropical Rainforest TEC within an area of 10,000 ha surrounding the subject land is shown in **Figure 4**.

(e) an estimate of the extant area and overall condition of the potential TEC remaining in the IBRA subregion before and after the impact of the proposed development has been taken into consideration

Approximately 4,620 ha of Illawarra Subtropical Rainforest TEC is mapped as occurring across the Illawarra IBRA subregion. This value is derived from mapped areas of used mapped projects as described previously. The project will result in the removal of ~0.17 ha of a degraded form of Illawarra Subtropical Rainforest TEC within the subject land, which represents less than 0.004% of the extent across the Illawarra IBRA subregion.

The condition of the TEC remaining within the Illawarra subregion is unknown, but remaining occurrences are generally small and fragmented (NSW Scientific Committee, 2011). This community is known to have suffered a decline in its distribution, with large areas cleared for agricultural purposes. Weed invasion is a major threat to the remaining occurrences of the TEC, as well as further clearing, grazing, inappropriate fire regimes and rubbish dumping (NSW Scientific Committee, 2011).

(f) an estimate of the area of the potential TEC that is in the reserve system within the IBRA region and the IBRA subregion

A total of ~4,620 ha of Illawarra Subtropical Rainforest TEC occurs within the Illawarra IBRA subregion of which ~307 ha occurs in the reserve system.

Due to the lack of reliable broad-scale vegetation mapping covering the entire IBRA bioregion, an estimate for the Illawarra Subtropical Rainforest TEC that occurs in the reserve system in the Sydney Basin IBRA bioregion was not obtained. However, based on the final determination (NSW Scientific Committee, 2011), it is estimated that ~440 ha of the community occurs in reserved areas overall.

(g) the development, clearing or biodiversity certification proposal's impact on:

(i) abiotic factors critical to the long-term survival of the potential TEC; for example, how much the impact will lead to a reduction of groundwater levels or the substantial alteration of surface water patterns

The project will not involve changes to groundwater levels, surface water patterns and soil disturbance that would impact the Illawarra Subtropical Rainforest TEC that will be retained within the subject property. The proposed development has been developed with particular regard to maintaining the hydrological regime in the subject property. The project is unlikely to have any impact on abiotic factors critical to the long-term survival of the TEC, both within the subject property and adjoining areas.

(ii) characteristic and functionally important species through impacts such as, but not limited to, inappropriate fire/flooding regimes, removal of understorey species or harvesting of plants

Within the subject land, a substantial change will occur to the composition of the community in the proposed footprint, as it will be entirely removed. However, indirect impacts, such as weed invasion and soil erosion are not anticipated to have a significant impact on characteristic and functionally important species.

(iii) the quality and integrity of an occurrence of the potential TEC through threats and indirect impacts including, but not limited to, assisting invasive flora and fauna species to become established or causing regular mobilisation of fertilisers, herbicides or other chemicals or pollutants which may harm or inhibit growth of species in the potential TEC

The entirety of the Illawarra Subtropical Rainforest TEC within the subject land has previously been modified as a result of previous clearing and disturbances associated with the construction of the existing building within the subject land. A suite of invasive flora species, including high threat exotics such as *Lantana camara*, are known to occur within this community within the subject land, and there is the potential for an increase of such species in areas of retained Illawarra Subtropical Rainforest TEC if left unmitigated.

The project is considered unlikely to result in the regular mobilisation of fertilisers, herbicides or other chemicals or pollutants which may harm or inhibit growth of species in areas of retained Illawarra Subtropical Rainforest TEC. The quality and integrity of the remaining areas of the TEC surrounding the subject land is unlikely to be significantly impacted, due to the modified nature of the surrounding vegetation. Furthermore, as part of the project, the retained extent of the TEC will be managed and protected under a VMP.

(h) direct or indirect fragmentation and isolation of an important area of the potential TEC

The removal of ~0.17 ha of Illawarra Subtropical Rainforest TEC will not significantly increase fragmentation or isolation of an important area of the TEC, as it predominantly requires clearing at the edge of treed habitat, rather than creating fragmented habitat patches. Although the project will increase the amount of overall fragmentation on a landscape scale, it will not result in the isolation of important areas of habitat. Well-connected, larger patches of the TEC will be retained within the subject property and will continue to provide connectivity through the landscape.

(i) the measures proposed to contribute to the recovery of the potential TEC in the IBRA subregion.

Mitigation measures to be implemented for the project will assist in minimising potential impacts to retained Illawarra Subtropical Rainforest TEC within the subject property. Biodiversity offsets as determined by the BAM are proposed to be purchased within the IBRA subregion or surrounding subregions, in accordance with the offsetting rules under the BAM, that will contribute to the recovery of Illawarra Subtropical Rainforest TEC in the surrounding landscape.

Therefore, it is considered the removal of ~0.17 of Illawarra Subtropical Rainforest would not represent a SAIL to the persistence of the TEC within the region.


References


NSW Scientific Committee. (2011). Illawarra Subtropical Rainforest in the Sydney Basin Bioregion – Determination to make a minor amendment to Part 3 of Schedule 1 of the Threatened Species Conservation Act.

FIGURES



Legend

 Subject Land

 Subject Property

Biodiversity Values Map




 Biodiversity Values

Image Source:
NearMap
(dated 29-3-2019)

Data Source:
DPIE (2020). Biodiversity
Values Map.



Coordinate System: MGA Zone 56 (GDA 94)



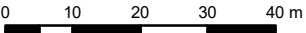


Figure 1. The subject land and the Biodiversity Values Map

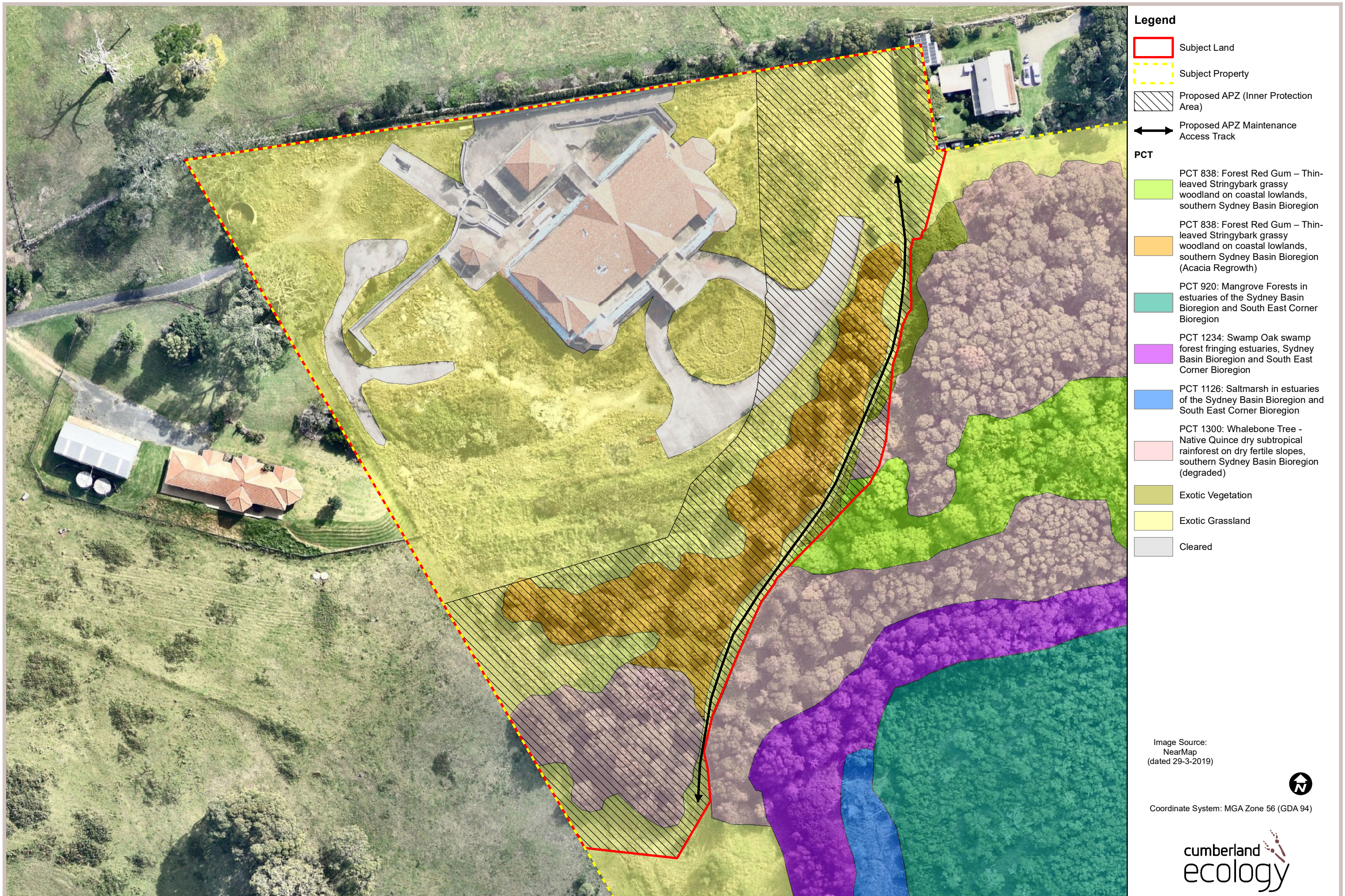
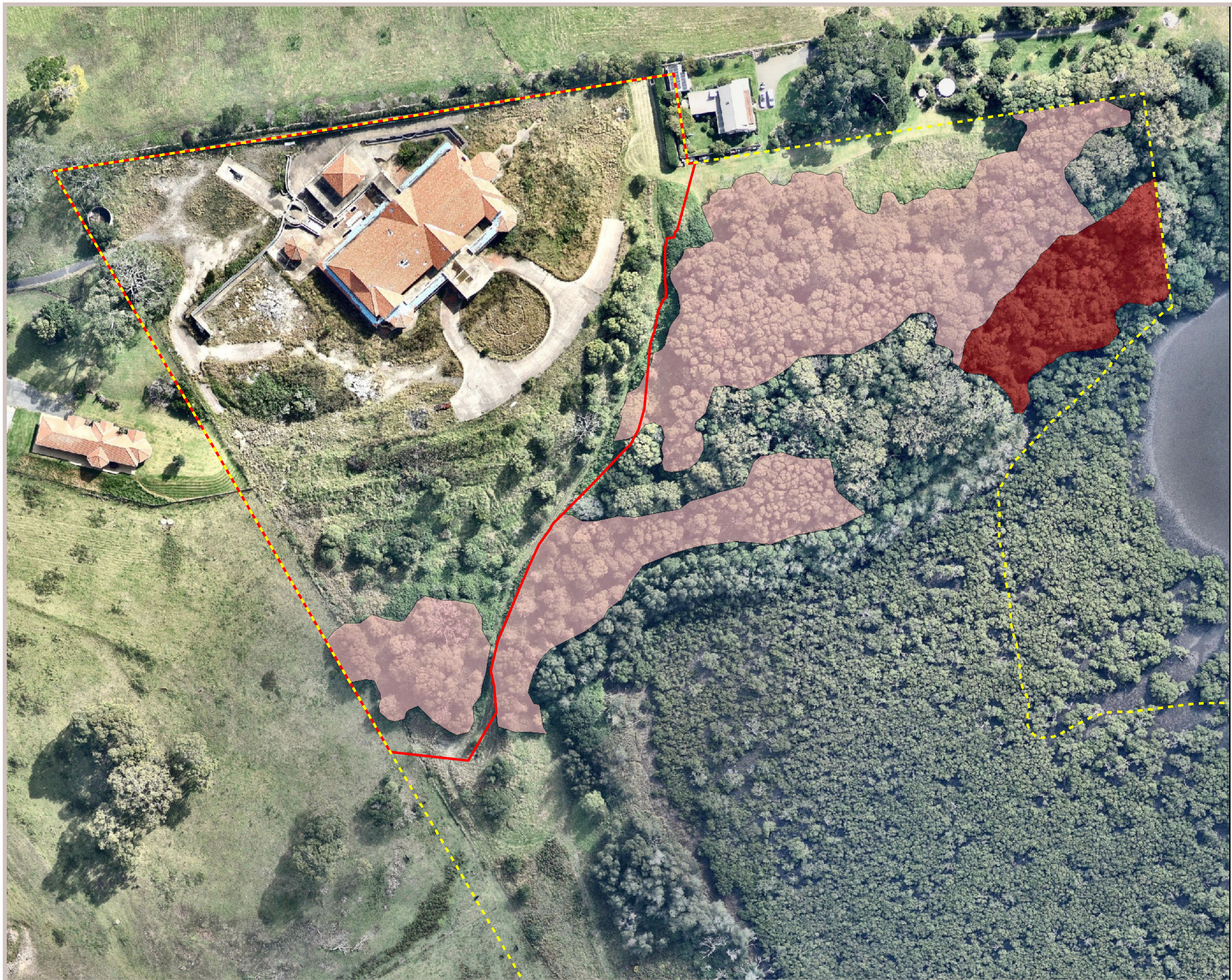


Figure 2. Proposed Asset Protection Zones (APZ) in relation to PCT mapping



Legend

- Subject Land
- Subject Property
- SAIL Entity**
- Illawarra Subtropical Rainforest TEC
- Illawarra Subtropical Rainforest TEC (degraded)

Image Source:
NearMap
(dated 29-3-2019)

Coordinate System: MGA Zone 56 (GDA 94)

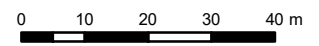


Figure 3. Location of Illawarra Subtropical Rainforest TEC within the subject land and subject property



Figure 4. Extent of Illawarra Subtropical Rainforest within a 10,000 ha area surrounding the subject land