



29 April 2021

Mr Stephen Barry  
Planning Director  
Independent Planning Commission NSW  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Barry,

**Independent Planning Commission's Draft Conditions of Consent  
Moriah College Redevelopment (SSD-10352)**

I write in response to the above application currently before the Independent Planning Commission (Commission) for determination and specifically in response to the Commission's request for advice on the draft conditions prepared for the application and referred to the Department on 23 April 2021.

The Department consulted with the Environment, Energy and Science Group (EESG) in relation to the proposed deletion of sub-clause (e) under Condition D7. The condition requires the Applicant to include conservation management measures for the endangered Maroubra Woodland Snail as part of a Vegetation Management Plan for the site.

EESG advised that the survey undertaken by the Applicant on a single occasion does not provide conclusive evidence that the Maroubra Woodland Snail does not occur on the site. Further, the site is located immediately adjacent to the species' potential habitat, being vegetation communities that comprise of the Eastern Suburbs Banksia Scrub ecological community. In consideration of the advice received from EESG, the Department recommends that draft Condition D7(e) be retained.

The Department does not raise any concerns in relation to the workability and enforceability of the Commission's proposed amendments to all other draft conditions that were referred to the Department for comment on 23 April 2021.

In response to the Commission's request for advice regarding local area traffic management (LATM), the Department contacted Waverley Council's (Council) traffic unit who advised that there is no specific LATM Plan in place. However, it was advised that LATM measures have previously been introduced to the local road network in proximity to Moriah College in Queens Park, and that these measures were introduced in consultation with the local community.

Should you have any further questions in relation to this matter, please do not hesitate to contact me directly on (02) [REDACTED] or via email at [REDACTED].

Yours sincerely,

Karen Harragon  
**Director, Social and Infrastructure Assessments**

Enclosed: Advice received from the Environment, Energy and Science Group



Our ref: DOC21/324447  
Senders ref: SSD-10352

Mr Brent Devine  
Planning and Assessment Group  
Department of Planning, Industry and Environment  
4 Parramatta Square, 12 Darcy Street  
PARRAMATTA NSW 2150

Dear Mr Devine

**Subject: EES comments on proposed amendment to draft condition D7(e) for Moriah College Redevelopment – Queens Park campus – SSD-10352**

Thank you for your email of 27 April 2021 advising that the Department has received a request for information from the Independent Planning Commission (IPC) in relation to the Moriah College redevelopment State significant development (SSD). Your email indicates:

- The Applicant (Moriah College) has requested that draft Condition D7 (which relates to the preparation of a revised Vegetation Management Plan (VMP)) be amended to delete (e) which requires the VMP to include conservation management measures relating to the endangered Maroubra Woodland Snail.
- The Applicant has requested this on the basis that the Maroubra Woodland Snail was not located during targeted field surveys of the site, carried out in March 2021. This was detailed in an addendum to the biodiversity development assessment report (BDAR) prepared by Cumberland Ecology and submitted as part of the application.

The Environment, Energy and Science Group (EES) has reviewed the additional information presented as an “addendum to the BDAR” by Cumberland Ecology and the applicant’s request to amend draft Condition D7(e). EES recommendations and comments are provided at Attachment A.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 [REDACTED] or at [REDACTED]

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

28/04/21

Susan Harrison

**Senior Team Leader Planning  
Greater Sydney Branch  
Environment, Energy and Science**

**Subject: EES comments on proposed amendment to draft condition D7(e) for Moriah College redevelopment – Queens Park campus – SSD-10352**

The Environment, Energy and Science Group (EES) has reviewed the additional information presented as an “addendum to the BDAR”, prepared by Cumberland Ecology (dated 5 March 2021) and the applicant’s proposed request to amend draft condition D7(e). In response EES provides the following comments.

Additional surveys for the Maroubra Woodland Snail (*Meridolum maryae*) are stated to have been undertaken on the night of 1 March 2021 for five hours between the hours of 6:00 pm and 11:00 pm including a minimum of two hours nocturnal spotlighting.

While rainfall at the closest Bureau of Meteorology rain gauge ([Randwick, weather station no. 66052](#)) for the 24 hours period from 9 am on the 1 March 2021 was recorded to be 0.0mm, 120.1mm of rainfall was recorded during the month of February, of which 53.1mm was recorded in the week preceding the surveys. The information also noted that the soil was found to still be moist following recent rainfall such that it could act as adequate foraging habitat for the Maroubra Woodland Snail (page 6). EES accepts these to have been suitable conditions for survey for the Maroubra Woodland Snail.

However, EES considers this single evening of survey does not provide conclusive evidence that the Maroubra Woodland Snail does not occur on the site. Furthermore, the development site is also immediately adjacent to the potential habitat of the Maroubra Woodland Snail, being vegetation communities which comprise the Eastern Suburbs Banksia Scrub (ESBS) ecological community on both Lot 23 which is a conservation area in the ownership and management of the Centennial Park and Moore Park Trust and on Lot 1 which is occupied by Moriah College.

EES therefore recommends a precautionary approach should be taken for the Maroubra Woodland Snail and the Vegetation Management Plan (VMP) for the subject site should retain conservation management measures for the Maroubra Woodland Snail as required by draft Condition D7(e).

EES does not support the proposed amendment to this draft condition D7(e) particularly as:

- the NSW Threatened Species Scientific Committee’s conservation assessment of *Meridolum maryae* Clark, 2009 (Camaenidae) (Maroubra Woodland Snail) notes:
  - the species is facing a very high risk of extinction in Australia in the near future
  - the species has a highly restricted geographic range
  - a large number of specimens have been collected from areas of podsolised dunes/sand plains (Narla Environment 2016) that support taller heath communities including the Eastern Suburbs Banksia Scrub Critically Endangered Ecological Community (as noted above remnants of this community occur on the site and adjoin the site)
  - the loss of habitat available for *M. maryae* across its distribution may mirror the loss of the Eastern Suburbs Banksia Scrub critically endangered ecological community (i.e. potential habitat (ESBS) still exists on the site and the adjoining conservation area)
  - conservation and management actions include:
    - avoid further loss of habitat
    - maintain and enhance the species habitat and connectivity
    - investigate options for linking or establishing additional populations
- Cumberland Ecology indicate areas of appropriate habitat occur within the subject land
- EES previously advised in its submission on the Response to Submissions Report (dated 31 July 2020) that where the VMP may legitimately apply, proposed revegetation should be undertaken by a suitably qualified bush regenerator with experience in restoring and maintaining the Eastern Suburbs Banksia Scrub in the Sydney Basin Bioregion (ESBS) vegetation community. The EES advice to restore and maintain the ESBS is consistent with the conservation and management actions outlined in the NSW Threatened Species Scientific Committee’s conservation assessment of *Meridolum maryae*.

End of Submission