



DOC20/358910
MP 07_0166 MOD 8

Michelle Niles
Senior Planner, Regional Assessments
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Niles,

Wahroonga Estate Concept Plan MP 07_0166 MOD 8 - amendment to Condition B5 Bushfire Protection

I refer to your email of 16 April 2020, requesting advice from the Environment, Energy and Science (EES) Group on the above and apologise for the delay in replying.

EES has reviewed the *Ecological Impact Assessment for Asset Protection Zones for the Central Church Precinct of the Wahroonga Estate redevelopment* report (the Report) prepared by Cumberland Ecology and notes it includes an 'assessment of the ecological impacts of the vegetation removal compared to allowing these areas to regenerate to a natural undisturbed habitat'. The Report concludes that if left unmanaged to regenerate, the understorey will quickly become dominated with woody weeds which would result in further declines in biodiversity values. This conclusion appears to assume these areas would be allowed regenerate with no management. EES considers, however, that if these areas were not managed as Asset Protection Zones (APZs) they would be actively managed for conservation under the Biodiversity Management Plan and could regenerate to a natural habitat.

In relation to the extent of vegetation management that would be required for the Central Church Precinct APZ areas to meet APZ requirements, the Report advises that as they currently managed as APZs continued management as APZs is likely to have very little impact. It is EES's understanding, however, that the original consent required these areas be protected within an E2 zone and not be managed as APZs. The Report advises the vegetation in these areas is Sydney Turpentine-Ironbark Forest (STIF), a listed Critically Endangered Ecological Community under the *Biodiversity Conservation Act (2016)*. EES's strong view is STIF vegetation must be protected and notes the NSW Scientific Committee's determination for STIF that it is characterised by a stratum of smaller trees below the canopy and an understorey that may be either shrubby or grassy. As the primary management purpose of APZs is to reduce fuel load by removing smaller trees, shrubs and grasses, EES advises that APZs are fundamentally incompatible with the conservation of STIF as its characteristic structure is removed and cannot be maintained.

Should you have any queries regarding this advice, please contact Richard Bonner, Senior Conservation Planning Officer on 9995 6917 or at richard.bonner@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "S. Harrison". The signature is written in a cursive, flowing style.

26/05/20

Susan Harrison
Senior Team Leader Planning
Greater Sydney
Climate Change and Sustainability