



Our reference: Contact:

Your reference: MP08\_0207 & MP10\_0219 DOC13/2104 Richard Bonner, 9995 6833

Ms Karen Jones Director Metropolitan and Regional Projects South Department of Planning and Infrastructure GPO Box 39 SYDNEY NSW 2001

Department of Planning Received 7 MAR 2013 Scanning Room

Attention: Helen Mulcahy

Dear Ms Jones

I refer to your letter of 18 January 2013 to the Office of Environment and Heritage (OEH) seeking comments on the Preferred Project Report (PPR) for 1, 1A and 5 Avon Road and 4 and 8 Beechworth Road, Pymble (MP08 0207 and MP10 0219).

OEH has reviewed the PPR and notes most of the issues raised in OEH's 15 February 2011 advice on the exhibited Environmental Assessment Report appear to have been addressed.

In relation to biodiversity, however, an adequate assessment of the potential indirect impacts of the revised development on native vegetation within the proposed conservation area does not appear to have been undertaken. OEH notes the revised Flora and Fauna Assessment identifies some indirect impacts, that appears not to have been assessed.

In addition, the revised draft Vegetation Management Plan (VMP), while identifying some appropriate management objectives, provides no information on the resources required to achieve the overall aim of conserving and enhancing the Blue Gum High Forest vegetation within the proposed conservation area and adjoining buffer zone. OEH recommends the VMP be revised to include a detailed estimate of the resources necessary to undertake the listed actions. The revised VMP should be prepared in accordance with appropriate guidelines (eg 'Guidelines for designing, implementing and monitoring revegetation for biodiversity conservation' available on the florabank website [www.florabank.org.au]). If approval for this proposal is granted, OEH recommends it be conditioned by requiring the applicant to financially guarantee the funds necessary to implement a revised (and costed) VMP. In making this recommendation, OEH does not seek an approval or review role for itself and considers such roles are undertaken by DoPI as the consent authority.

If you have any queries regarding this matter please contact Richard Bonner on 9995 6833.

Yours sincerely 4/3/13

LOU EWINS Manager, Planning and Aboriginal Heritage **Regional Operations, Metropolitan Office of Environment and Heritage** 

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