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Ms Amanda Blake
Senior Development Manager
MIRVAC
200 George Street
SYDNEY NSW 2000

By email: amanda.blake@mirvac.com

9th October 2019

RE: Proposed rezoning - 55 Coonara Avenue West Pennant Hills.

Dear Amanda,

I understand that the Department of Planning, Industry and Environment requires further explanation regarding the proposed rezoning and how it and the proposed Asset Protection Zone (APZ) responds to the site's ecological constraints.

As you know, the development envelope available for the Masterplanning process was driven by the ecological constraints identified by me 4 years ago at the start of the project. In line with best practice – and now enshrined in law in the *Biodiversity Conservation Act 2016* – the overarching objectives were firstly to avoid impacts, and secondly to minimise impacts. Thus, the development footprint avoids the ecologically valuable areas (remnant bushland, riparian areas, threatened species habitat) and is instead concentrated within the existing developed footprint.

The ecological mapping of the site has evolved from “Habitat Types” (based on land use history) that was used initially in the planning process, to “Vegetation Zones” (based on vegetation types and their condition). These maps have been produced from data collected from a combination of sources including historical and current aerial photography, detailed land survey, broad scale and detailed vegetation sampling, arboricultural assessment data, and relevant verifiable maps produced by others.

I note that maps produced for IBM in 1980 (appended) show that the treed areas were restricted to what we call the southern bushland. The edges and the creek lines were weedy, and the northern corner of the site contained “some native plants” but weeds were abundant. This was in keeping with the site's land use as an orchard.

The IBM landscape works resulted in the planting of Australian native trees in the car parks and gardens, some “enrichment” planting in the adjacent bushland, and some early weed control in the bushland.

While these actions have somewhat blurred the lines between the planted and natural systems, our Vegetation Zone Analysis of March 2018 (appended) demonstrates that the Masterplanned footprint– including the APZ – and the proposed rezoning remains faithful to the original objectives and best practice environmental assessment. Impacts are restricted to areas that have already experienced the most profound modifications (such as the existing IBM campus footprint), and regrowth vegetation of the lowest integrity (such as the weed infestations in the northern corner of the site). The areas of highest ecological value remain outside of the development footprint and APZ and are intended to be retained and protected in perpetuity and managed for conservation.

I hope this is of assistance to you. Please do not hesitate to contact me if you require further explanation or additional information.

Yours sincerely,



Elizabeth Ashby

**Principal Consultant
Keystone Ecological**

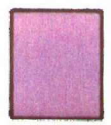
Attached:

1. Condition of Forest 1980, IBM Environmental and Services Manual, prepared by Landscan from National Trust source material
2. Environmental Protection Zone, IBM Cumberland Forest Master Planning Study, prepared by Devine, Erby and Mazlin, June 1980
3. Vegetation Zones, pp 11 from Ashby, E. and McTackett, A. (2018) Vegetation Zone Analysis, Coonara Avenue, West Pennant Hills, The Hills LGA. Unpublished report, Keystone Ecological

LEGEND



GOOD CONDITION,
VERY FEW WEEDS
A LARGE NUMBER
OF NATIVE SPECIES



FAIR CONDITION
WEEDS COMMON BUT
A LARGE NUMBER
OF NATIVE PLANTS



POOR CONDITION
WEEDS ABUNDANT
SOME NATIVE PLANTS

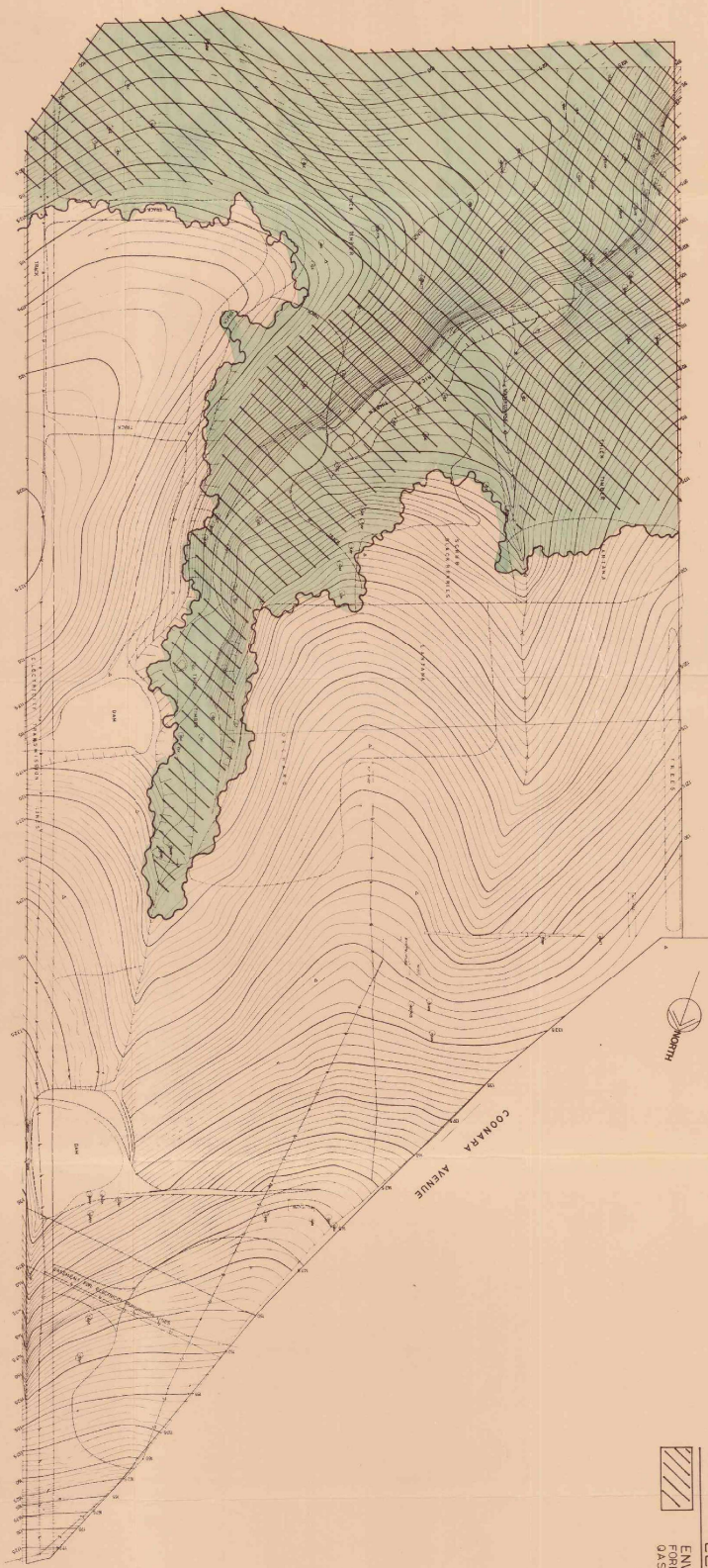
SOURCE: NATIONAL
TRUST



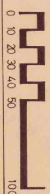
LEGEND



ENVIRONMENTAL PROTECTION ZONE
FOREST OUTLINE TAKEN FROM PHOTOGRAPH
OAS 1605 C NO.3332 DATE 30.5.80



SCALE



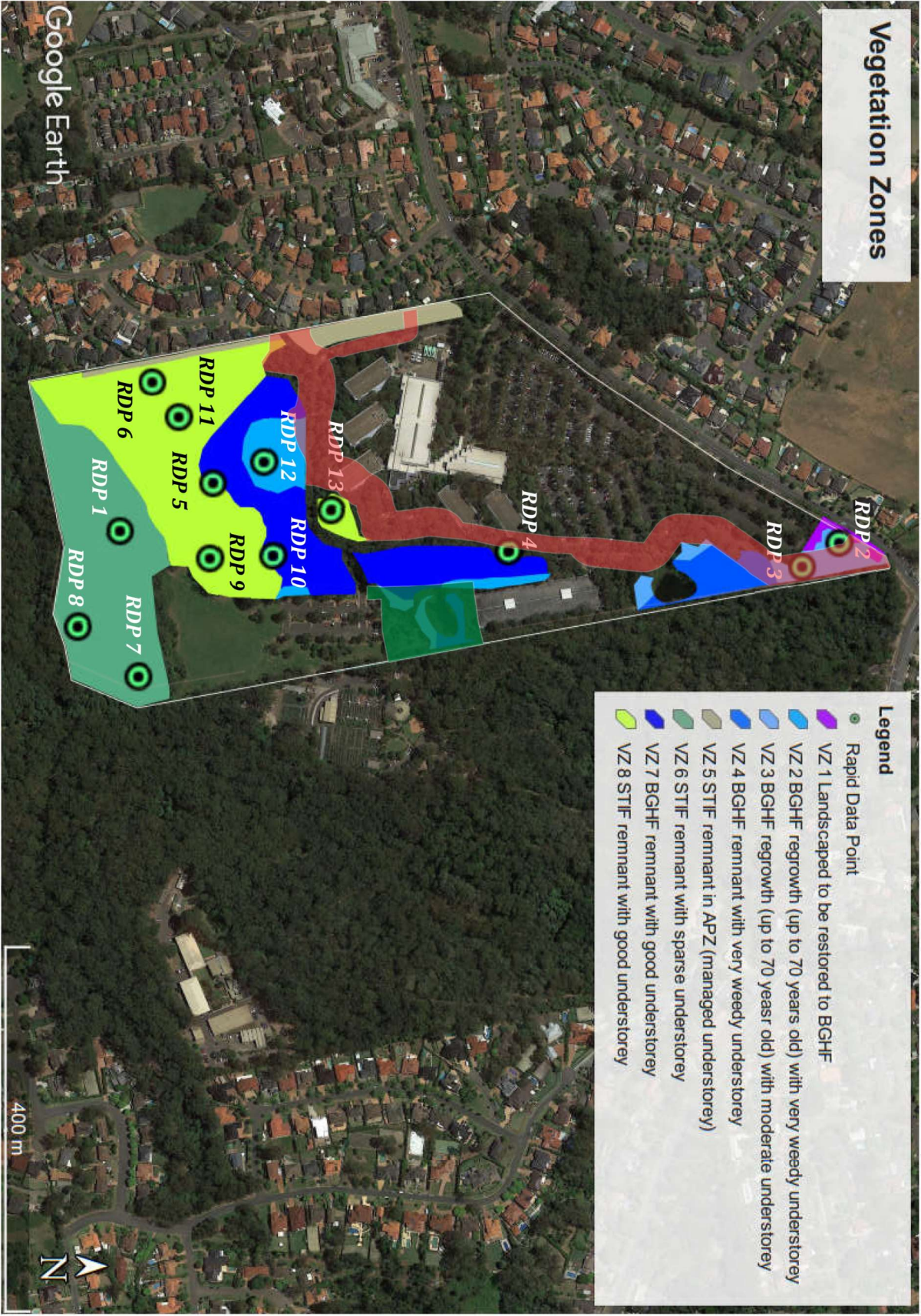


Figure 4: Vegetation Zones and Rapid Data Points.