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Dear Matt

***Grevillea parviflora* subsp. *parviflora* translocation area reassessment, Bennetts Green**

This letter relates to the management of *Grevillea parviflora* subsp. *parviflora* at Lot 4b South Street Windale / Bennetts Green. *Grevillea parviflora* subsp. *parviflora* is listed as vulnerable under the NSW *Threatened Species Conservation Act 1995* and the Federal *Environmental Protection and Biodiversity Conservation Act 1999*. The originally proposed construction of the Masters development and now the current proposed Bunnings development, as designed, would have required removal of numerous individuals and habitat for a population of *Grevillea parviflora* subsp. *parviflora* at the site.

Impact assessment of threatened species (including *Grevillea parviflora* subsp. *parviflora*) across the site was carried out as part of the Species Impact Statement (SIS) for the original proposed Masters development (ELA, 2012). The SIS determined that a significant impact would occur to the sub-population of *Grevillea parviflora* subsp. *parviflora* should the development proceed. As a result, several Conditions of Consent (CoC) as determined by Lake Macquarie City Council (LMCC), were placed on the project. Two CoC in particular related to *Grevillea parviflora* subsp. *parviflora*:

1. CoC to establish a biodiversity offset site at Ryhope to be managed *in perpetuity* for conservation purposes. The Ryhope site contains a large viable population of *Grevillea parviflora* subsp. *parviflora* and is managed as part of a Vegetation Management Plan (VMP) and a separate, but over-arching Plan of Management (PoM).

This CoC has been carried out and a VMP and PoM have been produced and are instrumental in the implementation of the management of the area.

2. CoC 28 requires the proponent undertake the translocation of 10 individuals of *Grevillea parviflora* subsp. *parviflora* from the development footprint into a suitable area within the development lot, but outside the development area. The original proponent (Hydrox) has undertaken the initial translocation program under the direction of ELA. This included: the site selection process; the actual translocation; maintenance and monitoring for 12 months; and production of an annual monitoring report.

As part of the new project design for Bunnings (**Figure 1**) the area previously identified and currently dedicated for the establishment of the translocated *Grevillea parviflora* subsp. *parviflora* is compromised due to required design modifications. The new design includes the need to incorporate fill and a retaining wall, this will include the modification of existing drainage and natural groundwater processes as per **Figure 2**. The new works will also separate the proposed translocation area from the adjacent retained native vegetation surrounding the council managed sporting oval.

From reviewing the current project site layout, in regard to the infrastructure proposed and the cut and fill required across the site, there appears to be no viable options to translocate the *Grevillea parviflora* subsp. *parviflora* within the project footprint that would allow for long term survival of the translocated individuals. To ensure the translocated plants have an improved chance at long term survival, it would be a better option is to relocate the plants to the south of the development area into Tulootaba Reserve. This would ensure that the plants are part of a dedicated reserve managed by Lake Macquarie City Council. The vegetation within Tulootaba Reserve is not considered as optimal habitat for the species, but the habitat present is a better option than the garden / landscaping areas of the construction site.

In support of the proposed use of Tulootaba Reserve for translocation purposes, it is highly likely that the design for the originally proposed Masters development would have encountered similar issues to the current Bunnings development due to the design, particularly in regard to the proposed changes in natural ground levels of up to 0.85 m in the Masters translocation area. Although the current translocation has been extremely successful from a plant survival perspective, the long term future of these plants at this location would have been significantly impacted by the design and construction works.

No *Grevillea parviflora* subsp. *parviflora* plants are currently present in Tulootaba Reserve, but there are some identified areas that may be suitable for translocation, as indicated in **Figure 3**. The section indicated in green has been mapped as a similar vegetation type as the species current location (Scribbly Gum – Red Bloodwood heathy woodland on the coastal plains of the Central Coast, Sydney Basin) and is preferable to other portions of the reserve. The area marked yellow has some limited potential for translocation.

In order to satisfy consent conditions, Bunnings should ensure:

- translocation / planting in the reserve is subject to landholder approval (LMCC) before undertaking works
- it is understood that funding/accountability/reporting responsibilities rest with Bunnings for the translocation works, regardless of land tenure

Upon any future translocation of *Grevillea parviflora* subsp. *parviflora*, which should be carried out in the near future, when conditions are favourable and before any construction works commence, the following recommendations to ensure the long-term survival (which are also part of CoC) are as follows:

- Identify and mark-out the translocation area(s) in Tulootaba Reserve
- Translocation methods are to be similar to those successfully implemented
- A 12 month initial maintenance and monitoring programme to be carried out
- Installation of protective fencing (post and rail) and interpretive signage as per the CoC
- Continued ongoing maintenance and weed management by bushland regenerators on a regular basis (estimate three or four visits annually)
- Continued monitoring as per the CoC

Please contact me if any additional information is required.

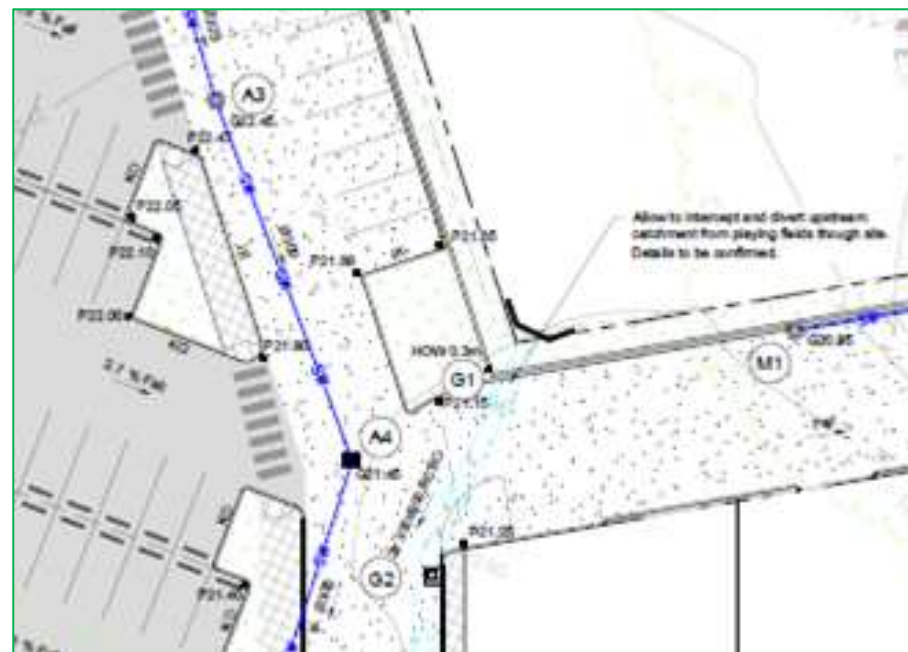
Yours sincerely,

A handwritten signature in dark ink, appearing to read 'G. Patrick', with a long, sweeping horizontal stroke extending to the right.

Gordon Patrick

Senior Botanist / Ecologist

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Figure 3: Areas within Tulootaba Reserve potentially suitable for *Grevillea parviflora* subsp. *parviflora* translocation