

Attention: Mr Chris Smith
Interface Planning
Po Box 192
Terrigal NSW 2260

**ECO LETTER IN RESPONSE TO DPIE COMMENTS RECEIVED FOR A
FUTURE SENIOR DEVELOPMENTS AT NO 216 & 234 PACIFIC HIGHWAY
CHARMHAVEN NSW**

Dear Chris,

It is understood that a response has been received from the Department
Primary Industry & Environment (DPIE) in regard to the site suitability statement
sought at No 216 & 237 Pacific Highway Charmhaven

This letter response has been prepared to address the ecological items below
raised by DPIE.

Biodiversity

- The site is mapped on the NSW biodiversity values map and an
Ecological Constraints Analysis was submitted with the application. Further
consideration of Swift Parrot habitat is required to determine how potential
impacts can be avoided and minimised.

Response: Figure 1 below identifies the area of land mapped upon the NSW
Biodiversity value map. An enquiry of the mapping identifies that the subject
properties were added to the map on 11/27/2020 with the following note;
“*Threatened species or communities with potential for serious and irreversible
impacts*”. Preliminary investigations has not identified any species of
plant/animal or communities with potential for serious and irreversible impacts
however it is noted that the site may be visited by Swift Parrot (*Iathamus
discolor*) which are listed as a species with potential for serious and irreversible
impacts.

The Swift Parrot (*Iathamus discolor*) breeds in Tasmania during spring and
summer, migrating in the autumn and winter months to south-eastern Australia.
The land mapped upon the Biodiversity Values map supports three plant
communities these being Narrabeen Doyalson Coastal Woodland (NDCW),
Swamp Mahogany Paperbark Forest (SMPF) & Cleared Land with Scattered
Trees (CST) Figure 2 (Attachment A). Consideration has been given to the
winter nectar food trees present within the subject property that provide a
foraging resource for the migrating Swift Parrot.

The canopy within the Narrabeen Doyalson Coastal Woodland & Cleared Land
with Scattered Trees communities was dominated by *Eucalyptus capitellata*
(Brown Stringybark), *Eucalyptus haemastoma* (Scribbly Gum) & *Angophora
costata* (Smooth-barked Apple). These species are not feed trees for Swift
Parrots.

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Scientific Licence No: SL100292.

Animal Research Authority: Expiry 30th of

March 2022 Trim file; 10/1887 DG ACEC

The following feed tree species: *Corymbia gummifera* (Red Bloodwood), *Eucalyptus robusta* (Swamp Mahogany) & *Eucalyptus teriticornis* (Forest Red Gum) were recorded from the NDCW, SMPF & CST communities. All feed trees can be retained within the SMPF community and the majority of feed trees can be retained within lands mapped upon the NSW Biodiversity Values map due to their sparse nature and low frequency of occurrence throughout these communities.

At the development stage an arborist report can be provided identifying all trees species upon the BV map and throughout the subject site, careful consideration can be given to the retention of Swift Parrot feed trees over non feed trees. It is possible to retain Swift Parrot feed trees at the development stage within input from a consulting arborist. Feed trees can be prioritised for retention over non-feed trees within the proposed asset protection zone.

Figure 1 NSW Biodiversity Values Map over the subject properties



- While a Biodiversity Development Assessment Report (BDAR) is likely to be required if the application progresses to development application stage, the application for SCC should demonstrate that there is adequate developable area on the land for the proposal.

Response: The preliminary design layout has located the bulk of the development footprint to the east of lands mapped upon the NSW Biodiversity Values map. Approximately 6.8ha of the site is not mapped upon the biodiversity values map.

Advice received from the Bushire consultant is that the majority of the trees that occur on the NSW biodiversity values map can be retained. Trees occurring within the biodiversity values map are sparse (Figure 1) Photograph 1 as such very minimal thinning is necessary to implement the installation of a future APZ. The ground vegetation within the biodiversity values mapped area is dominated by exotic pasture and lacks an understorey of native shrubs and groundcovers.

The land mapped upon the biodiversity values map is regularly mown and has been subject to many years of grazing. In summary adequate developable area is available to accommodate a future development footprint while maintaining the greater majority of the existing vegetation upon the biodiversity values map.

- The application should demonstrate consistency in managing bushfire and biodiversity considerations.

Response: See response above. In summary the native vegetation extent occurring within lands mapped upon the NSW Biodiversity values is sparsely occurring (Figure 1), the understorey is already managed (Appendix B) and consists of exotic pasture (Photograph 1-4). Proposed bushfire management within mapped lands is unlikely to result in substantial modification of the vegetation such that it results in adverse impacts upon existing biodiversity values. Careful consideration can be given to the retention of Swift Parrot feed trees over non-feed trees.

If you would like to discuss any of the provided information further or have any queries, please do not hesitate to contact me on 0402592399.

Yours sincerely



John Whyte

Principal Ecologist

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Appendix A

Vegetation Figure

Legend

- Project Site
- Narrabeen Doyalson Coastal Woodland (Low-Moderate Condition)
- Landscape gardens with scattered native trees (Poor condition)
- Swamp Mahogany Paperbark Forest (Moderate-good condition) EEC
- Cleared land with Scattered Trees (Poor condition)
- Dam



Appendix B

Site Photographs

Photograph 1 Exiting vegetation within the NSW Biodiversity Values map



Photograph 2 Exiting vegetation within the NSW Biodiversity Values map



Photograph 3 Exiting vegetation within the NSW Biodiversity Values map



Photograph 4 Exiting vegetation within the NSW Biodiversity Values map

