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Our Ref: 9049

6 December 2019

Breelle Varman
ADG Architects
3.04 Level 3
107-109 Mann Street
GOSFORD 2250

**RE: RESPONSE TO CENTRAL COAST COUNCIL REQUEST FOR INFORMATION
DA 54602 – 80 JOHN WHITEWAY DRIVE GOSFORD**

Dear Breelle,

Thank you for requesting updated reports and a response addressing each of the topics from the Request for Information from Central Coast Council dated 27 September 2019. An updated Flora and Fauna Assessment Report and an Updated Vegetation Management Plan is attached. These revised reports have provided an assessment of the current development plans provided and have incorporated suitable measures and assessments to address the matters raised by Central Coast Council. The following response to the matters raised by Council is also provided.

Clearing

The initial Flora and Fauna Assessment Report was prepared prior to *Conacher Consulting* being advised that the proposal would require bushfire asset protection zones.

Bushfire Asset Protection Zones are required for the proposed development as documented in the previous and current Bushfire Threat and Protection Assessment Reports prepared by Clarke Dowdle and Associates and submitted to Council initially with the development application.

We have been advised that a revision to the site plans and also a reduction to the Bushfire Asset Protection Zone requirements which has allowed for two vegetation retention and rehabilitation areas. These revised requirements are now assessed in the attached Revised Flora and Fauna Assessment Report and Revised Vegetation Management Plans prepared by Conacher Consulting.

A revised assessment of the tree locations and extent of retention and removal has been completed as part of these updated reports. The revised tree assessment has considered information from site surveys and the revised development layout and bushfire asset protection zone requirements.

Many small and young trees (saplings) were captured by the tree survey completed due to Council's DCP requirement to include all trees (including saplings) over 3 metres in height. A total of 868 trees have been surveyed within the site, this is composed of 598 trees assessed as small and young trees (i.e. saplings).

The extent of tree removal proposed has been reduced to enable the retention of 330 trees within the site. A total of 216 trees endemic to the natural site vegetation will be removed by the proposal including 82 which are not classed as small or young trees (saplings).

Trees prioritised for removal include:

- Trees within the proposed construction works footprint;
- Small and young trees;
- Trees with a <5 year or short useful life expectancy;
- Trees unsuitable or undesirable for retention within APZs due to high leaf oil content; and
- Trees which are potentially hazardous to further development or existing adjoining developments due to their size, condition or location.

The current level and pattern of tree retention has minimised the removal of large and visually prominent trees and will mitigate potential impacts to site stability.

The requirement for management of ground layer vegetation has also been revised to require annual management with a hand-held brush cutter, rather than with the use of machinery which would have required localised APZ regrading works.

There is a currently an approved development for the site (approved by Gosford City Council) which requires the areas outside of the 'buildable area' to be managed as an asset protection zone. The current approval is however not subject to the detailed and careful tree retention planning and management proposed within this current application.

State Environmental Planning Policy No. 19 Bushland in Urban Areas

This SEPP has been addressed in Section 4.3 of the Revised Flora and Fauna Assessment prepared by *Conacher Consulting* (2019).

Suitable impact mitigation measures addressing the matters raised by Council are provided in the Vegetation Management Plan prepared by *Conacher Consulting* (December 2019).

Threatened Species Assessment

It is noted that Council's Ecologist concurs with the conclusions of the Flora and Fauna Assessment Report prepared by *Conacher Consulting* (July 2019).

Council has now identified that the proposal would sever an existing corridor, reduce flora and fauna habitat in the local area and impact urban biodiversity.

A revised report is provided which provides an assessment of the updated site plans and details of further surveys completed within the site.

No additional threatened species have been observed and the revised report concludes that the proposed development is not likely to have a significant effect on threatened species, populations or ecological communities or their habitats.

The site has a history of extensive clearing, erosion and weed incursion disturbances associated with the historical use as a sandstone quarry. The current proposal will provide an opportunity to manage the retained areas of the site in perpetuity to reduce erosion, retain many of the large and visually prominent trees present, undertaken ground cover replanting and suppress the current high levels of weeds present. This would be completed in accordance with the Revised Vegetation Management Plan prepared by *Conacher Consulting* (December 2019).

If you require any further information please do not hesitate to contact this office.

Yours faithfully,



Jacob Manners
Senior Ecologist / Project Manager
CONACHER CONSULTING