



A Review of the Sainty and Associates (2006) report
'Environmental Constraint Analysis Lot 21 DP 714858,
45 Hearnnes Lake Road Woolgoolga'.

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Background

BBK Development Corporation Pty Ltd (BBK) is the owner of the parcel of land known as Lot 21, DP 714858 at 45 Hearnese Lake Road, Woolgoolga (the subject site). BBK currently has a staged development application (DA) for a proposed residential subdivision on the subject site. This DA is accompanied by a comprehensive Statement of Environmental Effects (SEE, Geoff Smyth Consulting 2006).

The subject site is in the immediate northern catchment of Hearnese Lake, which has been identified as a state significant Intermittently Open or Closed Lake or Lagoon (ICOLL). The subject site is separated from the lake by Hearnese Lake Road which runs the length of the site's southern boundary. To the south of Hearnese Lake Road are leasehold dwellings, a carpark, 4WD access road, pedestrian access paths to the beach and lake plus mixed vegetation comprising predominantly swamp sclerophyll forest and littoral rainforest which extends to the northern bank of Hearnese Lake.

In December 2005 Coffs Harbour City Council (CHCC, or 'Council') adopted a Development Control Plan (DCP) for Hearnese Lake / Sandy Beach (CHCC 2005), under the CHCC Local Environmental Plan (LEP, CHCC 2000). To inform recommendations for water quality control measures in the final DCP, the CHCC planning department, after consultation with the NSW Department of Planning (DoP), commissioned WBM Oceanics to undertake an estuary process study, and to subsequently prepare an estuary management plan (EMP, WBM Oceanics 2005) for Hearnese Lake ICOLL.

The EMP took 18 months to produce and made specific recommendations regarding protection of the ICOLL and the ongoing maintenance of the quality of water entering it. A 'MUSIC' hydrologic model was prepared to evaluate the performance of the EMP strategy. The EMP study recommended vegetation buffers for water quality purposes and these buffers were adopted in the Hearnese Lake / Sandy Beach DCP under the heading 'Water Quality'.

The DCP states:

"Water Quality

Point 2 - To ensure protection of water quality, the following buffers are to be provided (as determined by Council and shown on the Master Plan):

- a minimum of 50m from an RL level of 3.5 (ie, 3.5m above high datum (AHD)) around Hearnese Lake and Double Crossing Creek;
- 50m from SEPP 26 Littoral Rainforests;
- 50m from SEPP 14 Wetlands;
- 50m from Willis Creek;
- 20m from all other creeks,"

BBK subsequently commissioned WBM Oceanics to prepare a Storm Water Management Plan for the subject site. The WBM Oceanics study report and recommendations (WBM Oceanics 2006) are provided in the Statement of Environmental Effects (SEE) for the site which was submitted to Council.

A number of the provisions in the Hearnese Lake / Sandy Beach DCP required amendments to be made to the CHCC LEP. CHCC consulted the DoP, in accordance with the Minister for Planning's approval role for LEPs and amendments to LEPs.

The DoP subsequently commissioned Sainty and Associates Pty Ltd to undertake an independent review of a number of proposed development sites in the LGA identified by CHCC as adjoining areas considered to have ecological value.

Specifically, the DoP has commissioned Sainty and Associates to undertake an independent review of the conservation values of the subject site and to provide a map delineating areas for environmental protection and areas considered suitable for future potential development. This report (Sainty & Associates 2006, hereinafter referred to as the 'Sainty report') was submitted to DoP in September 2006.

BBK, upon receipt of the Sainty report, has engaged Eco Logical Australia (ELA) to provide a critical review of its findings and recommendations, and to relate those findings and recommendations to the environmental protection measures that are currently proposed for the subject site by BBK.

1. Critical Review of the Sainty Report

Review comments

Comments provided below are arranged beneath headings and section numbers as they appear in the Sainty report.

1.1 Purpose of the Sainty Report

Wetland Zoning

The Sainty report states that the current zoning of the freshwater wetland on the subject site is 7A Environmental Protection. This is incorrect. The subject site, including the DA proposed 7A Wallum Froglet habitat (Ephemeral Wetland) is currently zoned 2E Residential Tourism (Coffs Harbour City Council 2000).

1.2 Scope of Works

Consultation with DEC and DNR

Part of the scope of works for the Sainty report requires consultation with DEC and DNR staff. The report does not provide details of any consultation that may have been undertaken with DEC or DNR personnel.

Consultation with Council staff

Part of the scope of works for the Sainty report requires consultation with Coffs Harbour City Council (CHCC) staff. The report does not provide details of any consultation that may have been undertaken with Council personnel.

1.3 Background and Site Description

It is presumed that the ecological elements identified on the subject site by the Sainty report have been cited from previous flora and fauna studies, such as James Warren and Associates (2003), and have not been identified by thorough field survey undertaken specifically for the Sainty report.

The Sainty report cites six important ecological elements on or adjacent to the subject site: the Solitary Islands Marine Park (SIMP), Hearnese Lake (an ICOLL which is also a part of SIMP), a Littoral Rainforest Endangered Ecological Community (EEC), a freshwater wetland, a population of the Wallum Froglet *Crinia tinnula* and a specimen of the endangered plant Scented Acronychia *Acronychia littoralis*. Despite targeted searches undertaken by an ELA botanist familiar with Scented Acronychia, this species has not been located on the subject site.

The level of field reconnaissance of the subject site undertaken for the Sainty report is considered to have been inadequate, particularly in the identification of species-specific ecological values on the subject site.

The Sainty report overlooks the presence of the threatened plant species Austral Toadflax *Thesium australe* (Eco Logical Australia 2007). While not a conspicuous plant, several hundred individuals of this species occur on the subject site, and should have been recorded during a site inspection by qualified personnel. An adequate level of field survey for the Sainty report would also have confirmed the presence or absence of the Scented Acronychia on the subject site.

In any case, the Sainty report fails to acknowledge that all of the habitat for Scented Acronychia is proposed for buffered protection within the SEE for the current DA through appropriate environmental protection zoning.

There is also no mention in the Sainty report of the remnant native vegetation scattered across the southern part of the subject site. This vegetation, although significantly disturbed and therefore somewhat degraded, could be considered to be a remnant example of an Endangered Ecological Community (EEC) as listed under the TSC Act.

The current DA proposes amelioration to offset any potential impacts upon this remnant vegetation, through:

1. Collection of local seed for use in an assisted regeneration program and buffer and amenity plantings.
2. Assisted regeneration of the EEC within the proposed 7A environmental protection area and no-build areas within the 50 metre Hearnes Lake buffer zone, and in the proposed constructed wetland site for water quality management.
3. Retention of EEC trees within development footprint, where practicable, e.g. on road verges, in no-build parts of residential blocks, etc.
4. Explore opportunities for neighbouring landowners to engage in sympathetic restoration and protective management of the freshwater wetland and surrounding native vegetation.

These proposals are considered to more than adequately provide for the protection, restoration and maintenance of high conservation value vegetation on the subject site. Furthermore, the restoration and protection of vegetation within a proposed 7A reserve has the added benefit of securing a key local vegetated corridor which links Hearnes Lake, via the subject site, with other vegetated areas, including parts of Coffs Coast Regional Park, to the north of the subject site.

2. Sainty Review Of Available Documentation On Ecological Value Of Land

2.1 Coffs Harbour City Council Vegetation Strategy (CHCCVS)

The Sainty report provides a description of the CHCCVS and its use of existing CHCC vegetation mapping (Fisher *et al.* 1996) in conjunction with other criteria to categorise the relative conservation significance of vegetation in the CHCC local government area (CHCC 2003). However, the Sainty report does not acknowledge that the underlying council vegetation mapping for parts of the subject site is erroneous. For example, the Littoral Rainforest community adjacent to the eastern boundary of the subject site is incorrectly mapped as 'Fore Dune Complex', dominated by *Banksia integrifolia* and *Acacia sophorae*, and vegetation lining the northern shore of Hearn's Lake is mapped as 'Swamp Forest', when parts of that vegetation is predominantly Littoral Rainforest. Either the level of field reconnaissance undertaken for the Sainty report was inadequate, or there was no attempt to validate CHCC vegetation mapping (and its conservation status) for the subject site and environs.

2.2 Statement of Environmental Effects (SEE) as part of the Staged DA

The Sainty report states that the SEE (Geoff Smyth Consulting 2006) for a proposed staged residential subdivision of the subject site proposes no buffer to the wetland edge, nor the ICOLL. This is incorrect. The SEE adheres to the proposed 50m buffer on the 3.5m AHD contour to protect Hearn's Lake. This 50m buffer was recommended by WBM Oceanics in its EMP it prepared for CHCC, and duly incorporated into CHCC's DCP for the area. The DA for the subject site complies with the DCP in this buffer requirement.

The SEE also proposes protection of the entire wetland, along with the adjacent vegetated slope, as an Environmental Protection zoning (refer to sections 2.14.3 and 2.14.4 of the SEE). The vegetated slope adjacent to the wetland was considered to represent an appropriate buffer by the CHCC ecologist Mr Mark Graham, who mapped this agreed buffer after a number of on-site inspections.

The Sainty report does not appear to have reviewed, nor referred to, the report undertaken by WBM Oceanics (WBM 2006) which considers the likely impact of stormwater runoff, from the proposed development on the subject site, on the freshwater wetland and Hearn's Lake ICOLL. The WBM Oceanics study was commissioned by BBK in response to the recommendations of the CHCC Hearn's Lake EMP (itself prepared by WBM Oceanics), in order to ensure that the BBK proposed stormwater management plan for the subject site conformed with both the EMP and the DCP.

WBM Oceanics (2006) considered that all potential runoff-related impacts from the subject site were satisfactorily resolved by the stormwater management strategy proposed in the DA for the site, and in most respects the proposal was considered to exceed current best practice in stormwater management.

Part 6 of the WBM study reviews the DCP recommended 50m buffer to the SEPP 26 Littoral Rainforest. The WBM study concludes that:

"For this site, the SEPP 26 Littoral Rainforest would be separated from the development by an ephemeral wetland that intermittently captures and stores runoff prior to infiltration/evaporation. The ephemeral

wetland would therefore intercept runoff from the development site, preventing it from flowing into the SEPP 26 Littoral Rainforest. Although surface runoff would not drain directly to the littoral rainforest, it is likely that untreated surface runoff from the development would convey elevated stormwater pollutant loads to the ephemeral wetland. To minimise the potential for elevated loads of stormwater pollutants to be conveyed to the ephemeral wetland, it is proposed that a series of stormwater interception/treatment measures be provided along the rear of Lots 1–10. It is considered that the proposed measures in this area would achieve best practice management for stormwater quality and quantity. It is considered that provision of these measures would form an effective role as a primary water quality buffer for runoff discharging into the ephemeral wetland.”

This report was provided to CHCC as a part of the SEE for a staged DA on the subject site (Geoff Smyth Consulting 2006, Appendix F). Although the Sainty report cites the SEE, it makes no mention of the WBM report contained within the SEE, nor does it make any reference to the proposed stormwater management strategy.

It is considered that the application of the above buffers, in conjunction with the proposed best-practice stormwater management system, will result in the maintenance of high quality stormwater runoff into the wetland and ICOLL, therefore meeting or exceeding requirements of the DCP, including that for the SEPP 26 Littoral Rainforest.

The Sainty report states that the flora and fauna report for the subject site (Warren and Associates 2003) predates the listing as a threatened species of Scented Acronychia. This is incorrect. Scented Acronychia has been listed as a threatened species under the TSC Act since that Act’s inception in 1995, and it has been listed under the EPBC Act since July 2000. Furthermore, Warren and Associates (2003) lists the wetland plant *Maundia triglochoides* as occurring within the subject site. This species has been listed as a threatened species under the TSC Act since 2001. It appears that both Warren and Associates and Sainty and Associates have overlooked the status of this species in their considerations. In any case, a thorough search of the wetland area found only the similar but common Water Ribbons *Triglochin procerum* on the subject site (Eco Logical Australia 2007).

3. Sainty Identification of High Conservation Lands

3.1 Wallum Froglet habitat and land supporting Scented Acronychia

As stated above, Scented Acronychia has not been recorded on the subject site in spite of detailed searches (Eco Logical Australia 2007). Despite recognising the habitat value of parts of the subject site for the above species (notwithstanding the absence of Scented Acronychia), the Sainty report does not acknowledge that all of the habitat for these species is proposed for buffered protection within the SEE for the current DA through appropriate environmental protection zoning.

3.2 Freshwater Wetland

The Sainty report provides satisfactory criteria under which the wetland boundaries were delineated in the field. However, it fails to mention that the dominant sedge species in the intermittently inundated portion of the wetland is *Cyperus prolifer*, an introduced species of North American sedge. Whilst this observation in no way detracts from the ecological value of the wetland itself, it is of interest to note that such an interesting, and potentially problematic, occurrence of an exotic species which, until recently, was not recorded as naturalised in NSW (Harden 1993) should be overlooked by wetland specialists.

The entire extent of the freshwater wetland, including an extensive vegetated buffer on the adjacent east-facing slope, is proposed for environmental protection on the subject site.

The proposed buffer to the wetland includes a physical barrier in the form of a footpath and a vegetated swale along the western boundary of the buffer. CHCC Ecologist Mark Graham determined this setback through a number of site visits and concluded that the vegetated slope on the western side of the wetland was adequate for filtering stormwater runoff prior to it entering the wetland. This buffer has since been verified as adequate by the current CHCC Ecologist Gary Leonard, and the findings of WBM Oceanics and Eco Logical Australia further confirm this view.

3.3 Identification of Hearn's Lake

Sainty identifies the edge of Hearn's Lake as the 3.5m AHD vertical contour. This concurs with the SEE prepared for a DA for the subject site.

4. Sainty Discussion

4.1 SEPP 14 – Coastal Wetlands

The Sainty report argues for inclusion of the wetland on the subject site within SEPP 14 mapping (Adam *et al.* 1985). Sainty further states that 'the wetland is degraded by farm management practices' without specifying the features of the wetland that have been degraded, or to what extent the wetland is degraded. In any case, the current DA for the subject site proposes buffered environmental protection of the freshwater wetland, along with control of weeds and assisted regeneration of surrounding native vegetation.

The majority of the wetland is located on the two adjoining properties to the north of the subject site. Approximately 25% of the wetland occurs on the subject site. The Sainty report makes no mention of this, nor has CHCC included any proposals or recommendations for 7A protection of the wetland on the two adjoining properties, in spite of Council recently granting DA approval for the construction of two dwellings on the property immediately adjoining the subject site. This approval was granted after CHCC Ecologist Mark Graham had completed his assessment of the subject site and recommended the current proposed buffer and wetland protection.

4.2 Buffer Zones

The discussion in the Sainty report of the principles underlying the need for buffer zones appears to be based upon sound ecological considerations and is supported by the citation of relevant studies in the recent scientific literature. However, Sainty's subsequent assertion that the width of a buffer may be decreased at a certain point to be 'made up with a greater width elsewhere' is illogical and not based upon scientific principles (notwithstanding the need for a certain level of pragmatism when resolving land use issues).

There is clearly a diversity of opinion within the scientific literature regarding the necessary width of vegetated buffers. Not surprisingly, there is an equal diversity of views on an adequate width for buffers on the features on or adjacent to the subject site.

The Sainty report considers environmental buffer zones of between 30m and 50m width for the wetland and littoral rainforest, and adopts a 'compromise between these two buffers', apart from the southerly section of Littoral Rainforest, where it recommends a minimum 30m buffer. Furthermore, the Sainty report gives consideration to a 100m buffer on Hearn's Lake, but opts for 50m, stating, among other reasons, that 'This will also be consistent and contiguous with...buffers for the freshwater wetland and littoral rainforest areas.' This outcome does not appear to be based upon the application of consistent science or logic, and seemingly ignores the original 50m buffer recommended by the CHCC EMP (WBM Oceanics 2005).

CHCC, through its DCP, recommends a 50m buffer on the 3.5m AHD contour around Hearn's Lake, and a 50m buffer on both the freshwater wetland and the SEPP 26 Littoral Rainforest.

However, CHCC has provided the following advice to BBK regarding an acceptable buffer on the SEPP 26 littoral rainforest (CHCC letter to BBK dated 22 May 2006):

“Research indicates that edge effects in Littoral Rainforest can extend metres into vegetation stands. Edge effects are evident throughout the narrow bands of rainforest at Hearn's Lake. **The structure and quality of vegetation in the buffer are probably more important considerations than the width (indeed, housing is listed as an acceptable development within buffers).** Wattle species generally occur as edge species along the margins of Littoral Rainforests. The most commonly occurring wattle species which occur along Littoral Rainforest edges in the Coffs Harbour LGA are *Acacia maidenii*, *A. melanoxylon* and *A. longifolia* subsp. *longifolia*. Wattles provide shelter for slower-growing mesic species and increase nitrogen levels in the rhizosphere....

The preference is for 5 metres of wattle plantings, interspersed with the hardiest mesic species...CHCC ecologist confirms a minimum 5m wide edge protection planting to the southern section of the littoral rainforest would be acceptable, although a wider buffer would be preferable, where this was possible.”

The principles underlying the above CHCC advice are based upon a detailed knowledge of local vegetation and its ecology, and the actual ecological role required of the buffer.

WBM Oceanics, having undertaken both a comprehensive estuary processes study on behalf of CHCC, as well as a detailed stormwater management study on the subject site, recommends a 50m buffer on the 3.5m AHD contour around Hearn's Lake, and a similar buffer, with a stormwater management system, on the freshwater wetland.

However, WBM Oceanics argues that the 50m buffer on the SEPP 26 Littoral Rainforest is, in this case, unnecessary, as the rainforest is separated from the subject site by the freshwater wetland, which is already proposed for buffered environmental protection and active management of stormwater runoff into the wetland.

The current DA for the subject site proposes adequate buffers for the features on or adjacent to the subject site that are intended to:

1. Protect the existing littoral rainforest from 'edge effects' – the above advice from CHCC demonstrates that a high quality vegetated buffer as narrow as 5m can fulfill the role of protecting littoral rainforest from edge effects. In spite of Council's recommendation, and WBM Oceanics advice that a buffer in this case is not necessary, a buffer (combination vegetated and grassed) of approximately 20m width is proposed for this area in the current DA. This buffer proposal will incorporate Council's recommendations for appropriate plantings.
2. Protect the freshwater wetland and Wallum Froglet habitat – the current proposed buffer on the wetland and Wallum Froglet habitat incorporates a vegetated slope in order to allow for natural recharge of the wetland and filtration of rainwater runoff prior to it entering the wetland. The buffer to the wetland is further protected from any potential negative impacts of urban runoff by a grassed swale and proposed stormwater management strategy which is considered to exceed current best practice in stormwater management (WBM Oceanics 2006). This proposed buffer is considered to meet or exceed CHCC requirements for protection of the wetland and Wallum Froglet habitat.
3. Protect the values of Hearn's Lake – the recommended 50m buffer to the 3.5m vertical AHD contour on Hearn's Lake is supported and incorporated into the current proposal for the site. This buffer was recommended by WBM Oceanics and adopted by CHCC in its Hearn's Lake / Sandy Beach DCP.

5. Sainty Conclusion and Recommendations

5.1 Conclusion

The Sainty report concludes that boundaries and classification of high conservation value lands as identified by a previous mapping process (James Warren & Associates 2003) were determined in the field, and that it was determined that previous mapping of those lands was accurate. As mentioned previously, the CHCC vegetation mapping for land adjacent to the subject site was found, upon field inspection, to be erroneous (Eco Logical Australia 2007).

A 'desktop review' is cited by the Sainty report as 'confirming the influence of four listed communities/species on the site'. As stated previously, this assessment includes Scented Acronychia, which has been found not to occur on the site, and overlooks a disturbed, remnant example of a coastal floodplain EEC and the Austral Toadflax, which occurs in several patches on the site.

5.2 Recommendations

Recommendations arising from the Sainty report are provided on an *Environmental Constraints and Development Potential Map* (the Map) attached to the report. There are some technical problems with some of the boundaries displayed on the Map, as described below.

1. The southern property boundary on the Map is incorrectly shown. The actual property boundary lies approximately 20m south of the location shown on the Map, and more or less follows the northern edge of the unsealed section of Hearnese Lake Road. It appears that the Sainty report relied upon a non-survey version of the CHCC cadastral boundary mapping, which is known to be inaccurate and not suitable for survey-level mapping purposes.
2. The boundary of the 50m buffer to the 3.5m AHD contour of Hearnese Lake is depicted on the Map as a straight line within the southern and south-western boundaries of the subject site. This line would obviously not be a straight line, as it follows a natural contour. Again, this possibly represents a GIS error in mapping.

6. Summary of Critical Review of The Sainty report

The Sainty report is factually incorrect in mapping, zoning and interpretation in a number of areas. Specifically,

- The freshwater wetland on the subject site is currently zoned 2E Residential Tourism, not 7A Environmental Protection. The current DA proposes a change in zoning of specified areas to 7A to protect various areas and features such as the wetland, Wallum Froglet and its habitat, etc.
- The stormwater management plan for stormwater runoff in the current DA exceeds current best practice (WBM Oceanics 2006), and substantially enhances the intended function of proposed buffer zones. The Sainty report makes no mention of this.
- The Sainty report author does not appear to have had discussions with CHCC, DEC or DNR personnel, or has not referred to any discussions in the report.
- The Sainty report identified one threatened species that has not been located on the subject site and failed to identify one other which was located on the site, and which the current DA has proposed for protection and active management of habitat.
- The Sainty report states that the current DA provides no buffer to the wetland edge or ICOLL. This is incorrect. The current DA adopts the DCP required buffer, as agreed by CHCC Ecologists Mark Graham and Gary Leonard.
- The Sainty report fails to acknowledge the current DA proposal for buffered environmental protection of all Wallum Froglet habitat and Scented Acronychia habitat (notwithstanding that this species of plant has not been located on the site.)
- The Sainty report proposes buffers from 30m to 100m but concludes that 50m is satisfactory for the lake and wetland. This does not appear to be based on consistent science or logic. The Sainty report also proposes a 30m buffer on the southerly extent of littoral rainforest, which again is inconsistent and at odds with CHCC ecologist Gary Leonard's recommendation for a minimum 5m buffer with specific plantings designed to perform the intended buffering role.
- The Sainty report has relied on, and perpetuated, inaccurate mapping of the site – the correct southern property boundary lies some 20m south of where it is shown on the Sainty map. The proposed 50m AHD buffer on Hearn's Lake is shown as a straight line in part, which cannot be correct as the buffer follows a natural contour.

7. Conclusion

Eco Logical Australia Pty Ltd (ELA) has undertaken a review of the Sainty and Associates report analysing the environmental constraints on the subject site, located at 45 Hearnese Lake Road, Woolgoolga.

This review has been undertaken in conjunction with a high level of field survey of the subject site, and with reference to a number of key reports regarding the subject site including flora and fauna reports (James Warren and Associates 2003; Eco Logical Australia 2007), an SEE accompanying the current DA for the subject site (Geoff Smyth Consulting 2006), the Hearnese Lake Estuary Management Plan (WBM Oceanics 2005), a stormwater management study for the subject site (WBM Oceanics 2006) and the Hearnese Lake / Sandy Beach Development Control Plan (CHCC 2005).

ELA has identified a number of errors in interpretation and mapping in the Sainty report, as well as a number of omissions and overlooked details. While the Sainty report provides a broad overview of issues related to the subject site, it cannot provide the accuracy or detail that a substantial level of site-based field inspection can provide.

ELA recommends that the mapping errors in the Sainty report be corrected, and that additional information produced from site surveys be incorporated into the report.

ELA considers that the current DA for the subject site generally conforms to the recommendations of the Sainty report, apart from areas where the Sainty mapping is incorrect, or where other more detailed and ecologically consistent advice is available. Specifically:

- The Sainty report recommended buffer on the freshwater wetland is considered to approximate that proposed in the current DA. The Sainty report omits discussion of the site stormwater management system proposed in the DA. The proposed stormwater management system is considered by WBM Oceanics to represent current best practice, and is intended to considerably enhance the ecological function of the proposed vegetated buffer to the wetland;
- The Sainty report recommended buffer to the Hearnese Lake ICOLL is supported and is already incorporated into the current DA for the subject site;
- The Sainty report recommended buffer for the SEPP 26 Littoral Rainforest adjacent to the subject site is not supported, as ecologically-based advice from CHCC ecologist states that a minimum 5m vegetated buffer is adequate to protect the littoral rainforest from edge effects. The CHCC ecological advice maximises the intended ecological function of this buffer, rather than adopting an arbitrary distance with no specific, site-based solutions for the prevention of edge effects. Furthermore, WBM Oceanics advises that, for water quality purposes, a buffer on the littoral rainforest is not required, as the rainforest itself is separated from the subject site by the freshwater wetland, which is already protected by a vegetated buffer. Notwithstanding the above comments, the current CHCC and Eco Logical-agreed buffer to the wetland also provides a buffer of at least 25m from the mapped SEPP 26 Littoral Rainforest.

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