

Pariter
Level 23, Deutsche Bank Place
126 Phillip Street
Sydney NSW Australia 2000

Attn: Michael Cardillo

25 September 2025

Dear Michael,

SSD-63475709 Tumbi Umbi Retirement Living Project

Please find enclosed a response to the submissions received on the Tumbi Umbi Retirement Living Project from Central Coast Council (dated 22 August 2025) and NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) (dated 18/08/2025).

Yours faithfully



Kat Duchatel

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BAM Accreditation No. BAAS17054



Submission	Response
NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – 18/08/2025.	
ACTIVITIES ON WATERFRONT LAND Works within waterfront land be designed and constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land. The design and construction of works within waterfront land of the mapped 2nd Strahler order watercourse must consider the Guidelines for Controlled Activities on Waterfront land.	As per the response provided to DCCEEW’s submission dated 11 December 2024, Section 3.6 of the project BDAR provides a watercourse assessment. In summary: + Assessment of historical imagery shows that the existing drainage swale to the west of the development site was constructed in the early 2000s in tandem with the constructed wetland (northwest of the development site). Historical imagery from 1965 to 2005 only indicates man-made channels with no evidence of a naturally occurring watercourse. + Waterfront land is negated in this instance as the drainage line is concrete lined and exempted under the WM Reg. specifically Schedule 4 Exemptions - Part 2 Controlled activities exemptions: ○ 28 Activities on waterfront land if river is concrete lined or in pipe ○ Any activity carried out on waterfront land relating to a river where the channel of the river is fully concrete lined or is a fully enclosed pipe channel. + The proponent intends on restoring the drainage channel and easement to provide an improved aesthetic and ecological corridor, noting that a fully structured riparian corridor is not feasible due to fire hazard asset protection requirements and the need to maintain unimpeded flood flows within the easement. + A Vegetation Management Plan (écologique, July 2024) has been prepared to guide the restoration of the riparian corridor and its ongoing maintenance (including fuel reduction management).

Submission	Response
Central Coast Council – 22 August 2025	
ECOLOGY Council still recommends a 5yr Vegetation Management Plan (VMP) maintenance period, rather than the 3 years proposed.	The riparian zone will remain under the control and management of the Mingara Leisure Group (MLG). Table 5-1 (VMP implementation schedule) identifies the following time periods: + a 6mth establishment period post practical completion + a further 24mth maintenance period (which constitutes a defects liability period) + maintenance in perpetuity following the defects liability period. In perpetuity management of the VMP area supersedes the 5yr VMP maintenance period requested. Table 5-1 also outlines ongoing maintenance requirements, which are to be undertaken in perpetuity (including weed control, planting management and fuel management).
Council would concur with the comments of DCCEEW, that the mitigation and management measures identified in the final BDAR and VMP be conditioned for implementation at the relevant stages of development. This is to include preparation of a Biodiversity section within the Construction Environmental Management Plan (CEMP).	Agreed, however implementation of the VMP should apply to the post-construction stage of the development, i.e., at a time that all construction phase activities (including channel restoration works) will not require any disturbance to the VMP area.
FLOODPLAIN DEVELOPMENT The Flood Impact Assessment shows an isolated increase in flood level in the existing watercourse presumably because that is where flow is being directed. The increase is shown to be greater than 300mm during the 1%AEP event. Floodplain Management acknowledge that this increase does not affect any neighbouring properties however cannot be sure that it is not	The existing drainage channel adjacent to the site is concrete lined and the downstream wetland was constructed in the late 1990s. The constructed wetland was planted with macrophytes that are true aquatic species and capable of surviving various inundation levels. The 1% AEP flood level differences are shown in Figure 1 and the wetland shown in photo plates 1 & 2.

Submission	Response
going to have a detrimental impact on the existing natural habitats within the watercourse. Floodplain Management recommend that an ecologist provide comment about the significance (if any) of this impact. If there is not predicted to be any ecological impact resulting from this development Floodplain Management have no further issues.	Native vegetation growing on the batters of the existing channel also comprise terrestrial and semi-aquatic plant species (e.g., sedges, rushes, aquatic grasses and paperbarks); and that found in Forested Wetland vegetation formation and Coastal Forested Floodplain class. These wetland communities have evolved under periodic flooding conditions that would last longer than that of a post-development 1% AEP event. Temporary, infrequent increases in water levels of >300mm are considered highly unlikely to impact on wetland flora or fauna at this locality, or further downstream of the site.

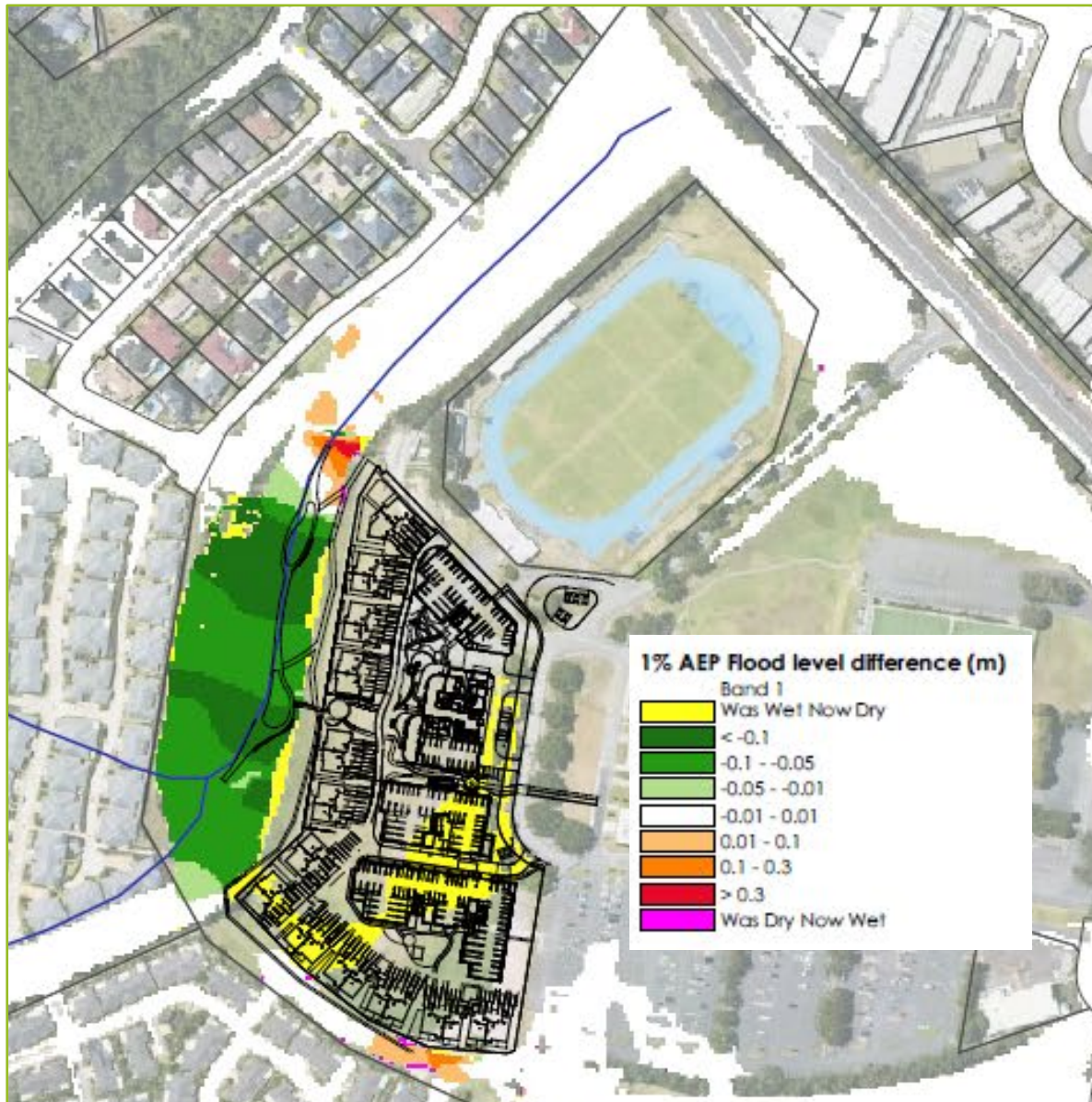


Figure 1. 1% AEP flood level difference



Photo 1: drainage channel and constructed wetland shown in area of potential 300mm increase during 1% AEI (viewed from south-southwest)



Photo 2: constructed wetland shown in area of potential 300mm increase during 1% AEI (viewed from southeast)

Department of Planning, Housing & Infrastructure

Attn: Lucinda Craig Senior Planning Officer
Social & Affordable Assessment Development
Assessment & Infrastructure

26 November 2025

Dear Ms Craig,

SSD-63475709 Tumbi Umbi Retirement Living Project

It is understood that the masterplan for the Tumbi Umbi Retirement Living Project has been amended to include a temporary display suite.

The general location of the proposed temporary display suite is located in the yellow box shown in Figure 1 below.

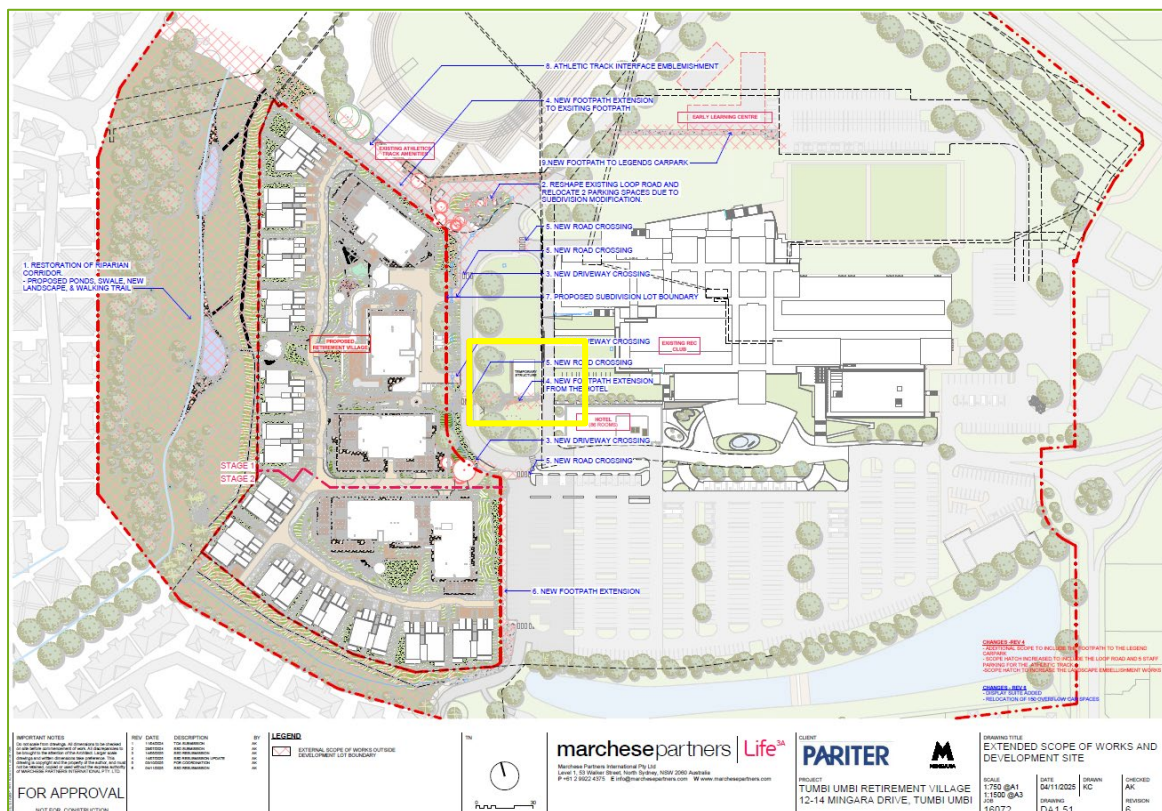


Figure 1. Site context of proposed temporary display suite

The proposed temporary display suite is located adjacent to an existing internal road and pedestrian crossing; and will be situated on:

- + Existing cleared land that comprises turf maintained by mowing, and
- + Land previously containing hardstand and containers (as shown in photo plate 1).



Photo plate 1: Aerial photographs from 17 June 2022

The adjacent planted fig trees may provide intermittent foraging resources for mobile bat and bird species when fruiting. However given the existing disturbed nature of the Site, and availability of higher quality habitat near to the Site, these trees are unlikely to be habitat of any importance for threatened species.

In the context of the proposed development, the addition of the temporary display suite does not alter the BAM assessment and BDAR submitted for the proposal.

Yours faithfully

Kat Duchatel

BAM Accreditation No. BAAS17054

