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August 8, 2012

Dear Mr. Liaros,

Re: Issues to be addressed in the Preferred Project Report for the Lakes Estate, North Boambee, Coffs Harbour Future Subdivision

It is understood that you have been preparing a preferred project report (PPR) for the Lakes Estate Future Subdivision that addresses comments from stakeholders including the Department of Planning, the former Department of Environment and Climate Change and others, with respect to the original Part 3A development proposal (Application No. 05_0129).

In preparing this report we have reviewed the following plans provided by you and prepared by Astoria Group Pty. Ltd.: 912 – A001C, A002C, A003C, A004C, A006C, A007C and A008E.

We note from the Koala habitat plan (912-004C) that the general approach has been to design the subdivision layout by avoiding tree removal or pruning of trees so as to minimise impacting on existing Koala habitat throughout. The noted exception to this is the southernmost stand of trees that are generally disconnected, relative to the principal bushland areas and corridors, where the bushland is proposed to be confined to an identified park area.

You have identified a set of issues that have been raised by stakeholders and have sought advice from Eco Logical Australia with respect to the most appropriate approach in the PPR. These are listed and addressed below.

1. Preparation of a Vegetation Management/Conservation Area Management Plan

Both the Department of Planning and the former Department of Environment and Climate Change have requested some form of management planning be established over lands to be set aside for conservation as part of the future subdivision arrangements. It is understood from discussions with you that there is in principal agreement with Council that all conservation lands be transferred to Council ownership to be dedicated as a network of conservation reserves. It is understood that this constitutes the majority of the primary and secondary Koala habitat that is present on the site. It is our recommendation that the management of these conservation areas be formally agreed to and arranged so as to ensure the long-term viability, management and conservation security in the context of the urban environment that will be developed in the surrounds. Typically a Plan of Management (PoM) would be prepared by Council to manage these lands. The PoM should include measures to deal with the major issues present on the site, set objectives for management and identify appropriate management actions and on ground works to be undertaken within a given timeframe. The following set of 'standard' management actions for conservation lands, based on guidelines developed by OEH for the Biodiversity Certification Assessment Methodology (BCAM), are an excellent basis for the development of a management plan for these conservation areas and include the following:

- Weed control
- Management of fire for conservation
- Management of human disturbance
- Retention of regrowth
- Replanting or supplementary planting where natural regeneration will not be sufficient
- Retention of dead timber
- Erosion control
- Retention of rocks

In addition to these general management actions, there will be a number of species specific recommendations that relate to the ecological values present on site including the presence of both Primary and Secondary Koala Habitat.

Finally, the management of these lands must be undertaken in accordance with the Coffs Harbour Comprehensive Koala Plan of Management.

2. Grey-headed flying fox.

It is noted that in the memorandum from Department of Planning Northern region to Department of Planning Director Coastal Assessments dated 10 September 2009, there is a requirement for a risk assessment to be undertaken with regards to the Grey Headed Flying Fox and its potential impacts on residents. Habitat assessments undertaken by Eco Logical Australia (2007) concluded that the large remnant area of subtropical lowland forest to be retained as part of the proposal is likely to constitute foraging habitat for the Grey-headed flying fox. However the report's likelihood table denotes that individuals were not observed in the subject site. There was no observation of a camp, transitory or maternal roosting site present. The nearest known camp is at Coffs Creek, approximately 3km to the North East. Whilst it is agreed that land use conflict associated with flying foxes adjacent to residential areas is an issue that requires attention and management, the likely presence of foraging individuals should not automatically necessitate buffers to development, risk assessment or dedicated management plans without further quantification of the magnitude of the issue. Buffers, risk assessments and dedicated management planning are more likely required where development is occurring directly adjacent to established camps.

3. Development in areas of Koala Habitat

It is understood that an area of known Koala habitat has been identified for residential development. Wherever possible (and throughout the development) it is recommended that the siting and location of building envelopes and associated infrastructure is undertaken in a manner that is sensitive to the preservation of Koala 'browse' trees by minimising the clearing of trees and allows for free movement of koalas across the site. Preferred Koala feed trees are to be used in landscaping where suitable, however plantings are to be positioned outside of fenced yards and not in areas that would direct Koalas to high risk situations (eg busy roads). Minimising threats to koalas from dogs within lots should be undertaken through prohibition of dog ownership, or confining dogs to Koala proof yards. Finally, any lots containing swimming pools to be required to be made Koala safe through the use of covers and provision of a koala rope for straying animals to use to rescue themselves from drowning. Council has published guidelines for development in koala habitat and these should be referenced in the PPR and implemented in subdivision design.

4. Road network to provide appropriate slow points.

The development of restricted traffic flow areas to provide appropriate slow points is considered an appropriate mitigation measure against death and injury to Koalas. The areas identified by the roads and movement access plan are considered appropriate. We have identified some additional areas and have also recommended the placement of Koala movement culverts at key locations within the subdivision. These have been incorporated in

plan 912-A008E – Roads and movement access plan. Slow points and Koala culverts should be implemented using best practice and guidelines published by Council.

Please do not hesitate to contact me if you have any further questions regarding the above.

Regards



Steve Dimitriadis

Senior Project Manager