Our ref: 18HEN03.2 BCAR

12 October 2022

Paula Moretti
Northern Beaches Council
PO Box 82
Manly NSW 1655

Attention: P Moretti

Dear Paula

- **Re: Biodiversity Certification Assessment Report for 10 and 12 Boondah Road, Warriewood**
  On behalf of Henroth Group

I make reference to the above Biodiversity Certification Application and associated Biodiversity Certification Assessment Report (BCAR), which have been prepared in support of the Planning Proposal.

Henroth Group (The Proponent) has made application for biodiversity certification under the Biodiversity Conservation Act 2016 (BC Act). In support of the application, *Travers bushfire & ecology*, has prepared a Biodiversity Certification Assessment Report (BCAR).

In accordance with Section 8.4(2) of the Biodiversity Conservation Regulation 2017 (BC Regulation), Council is invited to provide comment on the final BCAR as part of the application process. We advise that under the BC Regulation we are required to allow at least 42 days to respond. To assist in this process, the below link provides access to the BCAR. Not accounting for the period upon which Council has already had access to previous versions of the BCAR, and accepting that this letter commences the formal process, the 42-day consultation period is considered to conclude at the close of business on 23 November 2022.

https://drive.google.com/drive/folders/1mCJInKLhpIhhy6-GuXUafmd3Ac4RD5nT?usp=sharing

Updates to BCAR following Environment and Heritage Group (EHG) response

Travers bushfire & ecology prepared a Biodiversity Certification Assessment Report (BCAR) in association with a planning proposal at 10 and 12 Boondah Road, Warriewood (Lots 3 and 4 DP26902).

This BCAR along with supporting documents, was submitted to the Environment and Heritage Group (EHG) on 6th May 2022, and a response including multiple recommendations was provided by the EHG on 25th July 2022 (EHG ref. DOC21/190387-3). The BCAR was amended where appropriate to address these recommendations.

To help in your review, the key updates are summarised as follows:

- Further detail is provided in Sections 5.5.2 and 5.5.3 to assess direct and indirect impacts, and in Section 5.4 regarding mitigation measures
- Table 2.1 of the BCAR has been amended to ensure survey effort values are correct and consistent
- Additional targeted survey for Koala, Squirrel Glider, Grey-headed Flying-fox, owl and cockatoo breeding habitat, and Maroubra Woodland Snail has been completed in August 2022 (Table 2.1, Figure 3.3 of BCAR). Table 4.3 of the BCAR assessing candidate species has been revised
- Further detail is provided within Section 2.3 and Table 2.1 of the BCAR describing potential habitat for candidate frog species and frog survey techniques
- Errors in credit assessment have been corrected. Eastern Bristlebird and Giant Burrowing Frog are not listed as a candidate species by the BAM calculator, and are not associated with PCTs 1232 and 1793. As such these been removed from the assessment as candidate species
- Section 4.2.2.(b) of the BCAR has been updated to reference Chapter 4 of State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Koala Habitat Protection) rather than the repealed State Environmental Planning Policy (Koala Habitat Protection) 2021
- Further detail is provided in the BCAR on the creation of species polygons toward the end of Section 5.6 of the BCAR.

Further information requested following meeting with Council (21st Sept 2022)

In an online meeting on 21st September 2022 to discuss the planning proposal, Council identified several ecological and bushfire items for clarification or further detail. These are addressed below.

Coastal Wetland

The Masterplan has been re-designed to further avoid impacts on the areas mapped as Coastal Wetland on the Coastal Wetlands and Littoral Rainforest Area Map – see Attachment 1 below. The proposed C2 land will now encompass all of the mapped wetland. This change is yet to be incorporated into the BCAR.

Landscaped buffer

Council identified that a landscaped buffer is required between the proposed development and the wetland. This location forms park of the Asset Protection Zone (APZ), and it was questioned whether a landscaped buffer is permissible within an APZ. We confirm here that landscape plantings are permissible within the APZ in compliance with the Planning for Bushfire Protection (PBP) requirements for Inner Protection Areas (IPAs) as follows:

Trees

- *tree canopy cover should be less than 15% at maturity;*
- *trees at maturity should not touch or overhang the building;*
- *lower limbs should be removed up to a height of 2m above the ground;*
- *tree canopies should be separated by 2 to 5m; and*

- *preference should be given to smooth barked and evergreen trees.*

Shrubs

- *create large discontinuities or gaps in the vegetation to slow down or break the progress of fire towards buildings should be provided;*
- *shrubs should not be located under trees;*
- *shrubs should not form more than 10% ground cover; and*
- *clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation.*

Grass

- *grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and*
- *leaves and vegetation debris should be removed.*

All landscaping is to use native species, not limited to the APZ / Landscaped Buffer, to expand the effectiveness of the buffer and allow for better site management adjoining a sensitive landscape.

Bangalay Sand Forest TEC

The subject land contains 0.23 ha of *Bangalay Sand Forest of the Sydney Basin and South East Corner bioregions* TEC, which will be impacted by the proposal. This vegetation is highly disturbed, and is comprised of canopy trees with virtually no native understorey.

The masterplan design allows for landscaped areas that are to be planted with native species commensurate with Bangalay Sand Forest. It is estimated that up to 0.5 ha would be available for replanting within the site (including APZ) which is slightly more than a 2:1 replacement to impact ratio. Although fully-structured forest within these replacement plantings may not be achievable, it is likely they would still achieve more diverse floristic structure compared with the existing Bangalay Sand Forest due to the presence of shrubs and ground layers and management of exotic species.

Table 1 – Impacts and potential replacement plantings of Bangalay Sand Forest TEC within subject land

	Impacted	Potential replanting within landscaping	Net outcome
Area (ha)	0.23	c. 0.5	+0.27
No. trees	27	c. 44	+17

If you require any further information, please do not hesitate to the contact the undersigned on 1300 896 998 or at servicedesk@traversecology.com.au

Yours faithfully

George Plunkett

Botanist - ***Travers bushfire & ecology***

www.traversecology.com.au

Attachment 1: Amended biodiversity certification area

Legend

- Site boundary (2.04ha)
- Biodiversity certification area (1.78ha)
- Amended Biodiversity certification area (1.7ha)
- Coastal wetlands
- Proximity area for coastal wetlands

TRAVERS BUSHFIRE & ECOLOGY
A TBE ENVIRONMENTAL COMPANY

PROJECT & MXD REFERENCE	DATE & ISSUE NUMBER	SCALE & COORDINATE SYSTEM
10 & 12 Boondah Road, Warriewood 18HEN03.4_P001	10/10/2022 Issue 1 SC	1:1,000 @ A3 GDA 1994 MGA Zone 56

0 20 40 m

TITLE

Amended Biodiversity Certification Area

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Disclaimer: The mapping is indicative of available space and location of features which may prove critical in assessing the viability of the proposed works. Mapping has been produced on a map base with an inherent level of inaccuracy, the location of all mapped features are to be confirmed by a registered surveyor.