

From: [REDACTED]
Sent: Monday, 4 March 2024 6:51 PM
To: Central Coast Council
Subject: Objection to DA/2464/2023 at 18 MacLeay Ave Woy Woy.

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Dear Central Coast Council,

I am writing in objection to DA/2464/2023 at 18 MacLeay Ave Woy Woy.

My main concern is the removal of vegetation. The site directly borders a remnant pocket of Coastal Sands Swamp Mahogany Rush Forest, which is listed as an Endangered Ecological Community (EEC) under the broader heading Coastal Swamp Sclerophyll Forest of NSW & SEQLD (Department of Agriculture, Water and the Environment, 2021). **The boundary of this EEC overlaps with the lot boundaries at 18 Macleay Ave, Woy Woy**(see below maps from SEED portal for reference).

The vegetation in the mapped EEC zone of the proposed development site should be protected in line with the *Environment Protection and Biodiversity Conservation Act 1999*. Not only should the privately held area mapped as EEC be protected, but extreme care should be taken when managing the land directly adjacent. It is best practice to retain, restore and revegetate a buffer zone (to a suggested minimum width of 20m) around EEC's to reduce edge effects, weed incursion, run-off, anti-social behaviour, dumping and other negative environmental impacts.



As per the publication *Conservation advice for Coastal Swamp Sclerophyll Forest of New South Wales and South East Queensland*, the following management strategies should be implemented by land managers:

- **“Identify and retain other native vegetation near patches of the ecological community, where they are important for connectivity, and/or act as buffer zones between the ecological community and threats or development zones.**
- **Protect mature and overmature trees** and stags, particularly with hollows.
- Identify patches that are important habitat for listed threatened species, or of regional importance. Protect these as part of formal conservation reserves or investigate formal conservation arrangements, management agreements and covenants to **protect patches on private land**. This is **particularly important** for larger patches, or **areas that link to other patches of native vegetation**, or that are part of wildlife corridors or migration routes.
- Where regeneration occurs, provide measures that will support the regeneration to maturity (e.g. provide fencing to minimise grazing/trampling damage risk).
- Implement programs to manage invasive fauna, including domestic species.”

In addition, as per the *NSW Wetlands Management Policy 1996*, land managers should be re-establishing vegetation buffer zones around wetlands. Similarly, the need for the creation of buffer zones between areas of development and remnant habitats is recognised within the State Government endorsed publication *Managing Urban Stormwater: Soils and Construction*. A waterway is visible on the attached maps running through the Coastal Sands Swamp Mahogany Rush Forest and this EEC may have once comprised wetlands considering surrounding and nearby ecology.

As is identified in the attached maps, this EEC (Coastal Sands Swamp Mahogany Rush Forest) directly adjoins another EEC (Umina Coastal Sandplain Woodland), making this a particularly significant collective remnant of two connected EEC’s (see below map).



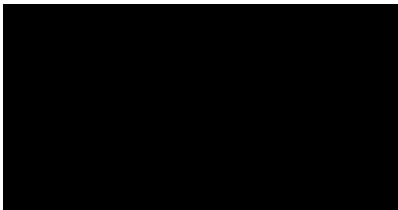
Retention and conservation of existing remnant native vegetation characteristic of the abovementioned EEC’s should occur on the proposed development site. In addition, regeneration and appropriate revegetation works should occur along a substantial buffer to improve the density and quality of the edge to provide protection to the core of the EEC vegetation.

If this buffer is suitably protected and managed, this would be a major asset to the development site and an environmental and ethical triumph for Council. This is an excellent opportunity to champion best practice, sustainable and responsible urban design.

Other than concerns over the boundary with the EEC, the application seems commendable with otherwise decent landscaping for the most part.

Please consider adjusting landscaping to fit the best practice land management activities above, increase and enhance the EEC buffer zone and exclude any potentially invasive plants from the site.

Ref: Department of Agriculture, Water and the Environment 2021, Conservation advice for Coastal Swamp Sclerophyll Forest of New South Wales and South East Queensland, Canberra.



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