

Luke Houghton

Balanced Systems

Via email: planners@balancedsystems.com.au

30 August 2021

AWC Reference: 1-211456a

Dear Luke

RE: DA 10.2021.5.1 – Request for Further Information

The purpose of this letter is to respond to Council's Request for Further Information (RFI) issued 5th August 2021 in relation to DA 10.2021.5.1 at 75 Rifle Range Road Bangalow. The RFI states the following with regard to addressing State Environmental Planning Policy (SEPP) Koala Habitat Protection 2020:

Water | Ecology | Management

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Bangalow NSW 2479

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It is considered that the central vegetated corridor of the property meets the definition of "potential koala" habitat because the number of koala feed tree species (KFT's) in this area likely constitutes more than 15% of the total number of trees in the upper or lower strata of the tree component.

In accordance with clause 9 of the Koala SEPP 2020, Council is required to consider whether the vegetation comprises "core koala habitat" before determining the application.

Provide a report from a person with appropriate qualifications and experience in biological science and fauna survey and management investigating whether the vegetation in the central corridor comprises core koala habitat as defined in the SEPP. It is suggested that a survey will likely be required to assess the site for attributes such as those contained in the definition of core koala habitat. Section 2.1 of the former SEPP 44 Guidelines (attached) may be used to inform the content and/or methods used in the preparation of any such survey or investigation.

Alternatively, provide a detailed vegetation survey demonstrating that the number of KFT's is less than 15% of the total number of trees in the upper and lower strata of the tree component.



To address Council's requirements, the following assessment has been completed.

- Site field survey of the 'central corridor' completed 30/08/2021; depicted as 'Implemented EEMP' in the Vegetation Management Plan (version 1.0); refer Attachment A.
- Counting all trees and shrubs within the central corridor based on two criteria: Schedule 2 Koala feed trees or non-schedule 2 feed trees. At the site, Schedule 2 trees are limited to Tallowwood (*E. micorys*) windbreak plantings (mature trees) in addition to infill plantings of Forest Red Gum (*E. tereticornis*) and Tallowwood (immature developing trees). All non-schedule 2 trees (infill rainforest plantings, natural regeneration) were counted as 'other'.
- For ease of data collection sections of the central corridor were divided into 'blocks' with four blocks separately fenced; blocks were assessed from north to south. A breakdown of results is provided at Attachment B.

Results

Field survey determined a total count of 1364 trees within the central corridor. Established windrow plantings (Turpentine, Tallowwood, Flooded Gum, Red Cedar) comprise a small proportion of these trees (n = 71), with the schedule 2 species Tallowwood comprising 43 trees. The balance of trees in the corridor comprise infill rainforest plantings and minor regeneration (mostly Bleeding Heart *Homalanthus populifolius*). Within the infill plantings a total of 95 planted schedule 2 trees occur comprising Forest Red Gum and Tallowwood (the latter occur infrequently). In total, 138 schedule 2 trees occur within the central corridor, comprising 10.12% of total trees.

Conclusion

On the basis of the field survey results, the central corridor does not comprise potential Koala habitat as defined in the Policy as schedule 2 trees do not comprise 15% of the tree layer. On this basis no further assessment is required and the Policy need not be addressed further. This approach is consistent with the 'decision flowchart' depicted in Circular B35 (DUAP 1995), which underpins the Policy, as shown at Attachment C.

I trust this information is sufficient for your needs. Please advise if you require further information.

Yours sincerely,



Ian Colvin

Principal Ecologist

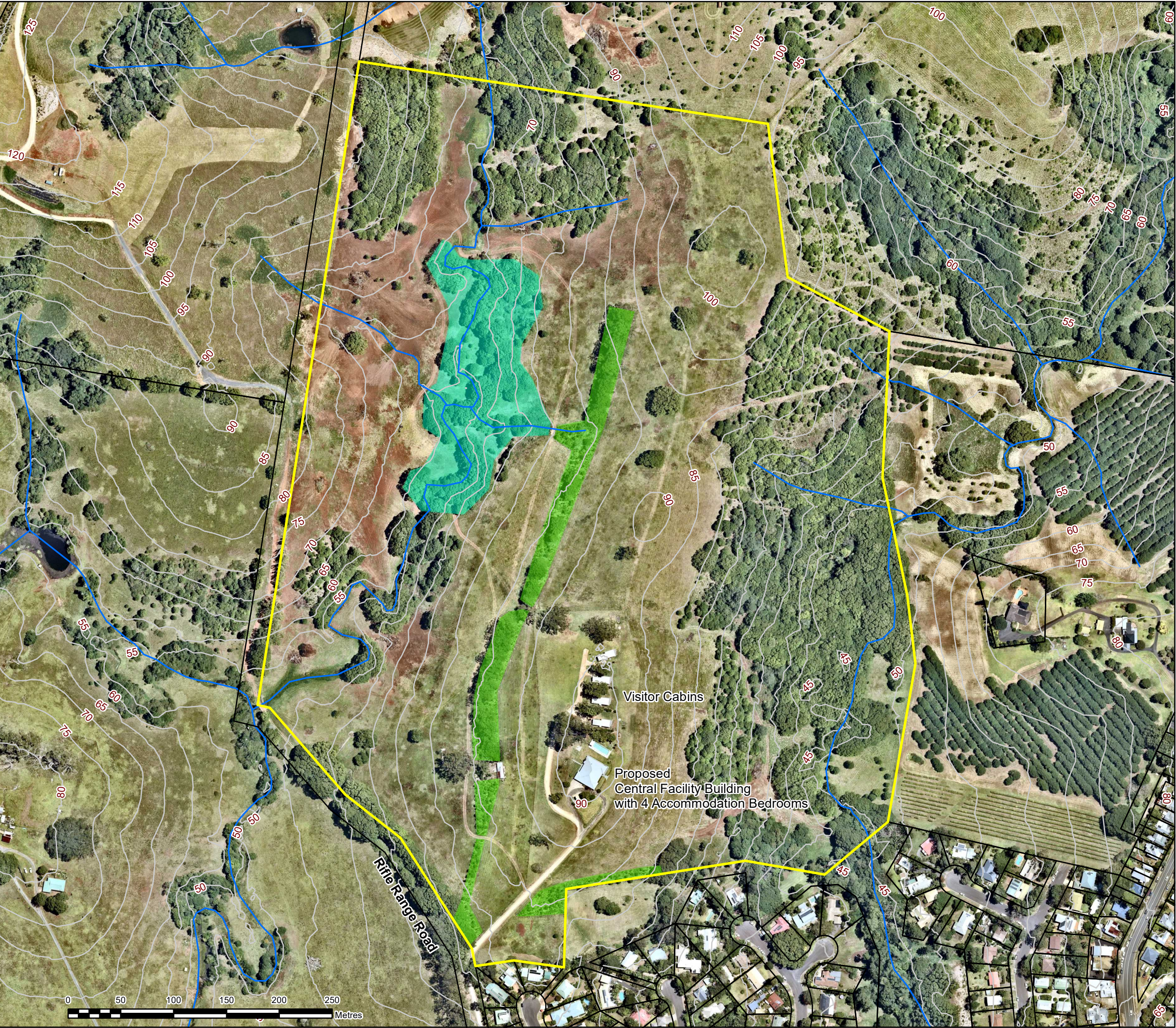
Attachments:

Attachment A: VMP

Attachment B: Results

Attachment C: Circular B35 – decision flowchart

Attachment A: VMP



**Lot 39 DP 625255
75 Rifle Range Road
Bangalow**

Illustration:
Vegetation
Management Plan
(Draft)

Environmental Management Zones (EMZ)

- Subject Site
- Cadastre
- Mapped Watercourse
- Contour (5m)
- Implemented EEMP (10.2017.360.1)
- Western Creek Central EMZ (2.0 ha)

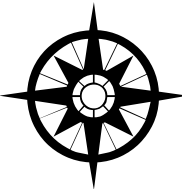
SUMMARY OF ECOLOGICAL WORKS
4 Visitor Bedrooms x 900 tree plantings =
3,600 tree plantings and/or equivalent works

Riparian Rainforest Plantings
2,500 plants sourced from local nurseries
2 - 4 m average spacing
Total Area = 1.5 ha

Weed Management / Bush Regeneration
500 equivalent tree plantings as
weed eradication and control, primarily
Camphor Laurel and Small-leaved Privet
Total Area = 1 ha

Fencing
700 equivalent tree plantings as 700m of fencing
- Provision for wildlife movement through fencing
however restrict cattle access

Note: Final VMP to be finalised following consultation with Council



Scale shown at A3
1:3,500

LOCATION:
Lot39RifleRangeRd/Illustrations/VMP

VERSION:
1.0

DATE:
October 2020

DATA SOURCE:
LPI NSW 2020

AERIAL IMAGERY:
NSW LPI



DISCLAIMER
This map was produced for the client for a planning application to council and should not be used for any other purpose.
The information shown in this figure should not be assumed to be completely accurate for detailed design purposes.
The aerial imagery, boundary and contours are in approximate position for planning purposes.
Balanced Systems hereby disclaims liability for the use of information obtained from this figure for any purpose.
This note is an integral part of this plan.

Attachment B: Results

Block	Species	No. trees	schedule 2 - no. trees
1	Red Cedar (W)	3	
1	Turpentine (W)	15	
1	Flooded Gum (W)	7	
1	Tallowwood (W) - schd 2		13
1	Forest Red Gum (planted) - schd 2		11
1	Tallowwood (planted) - schd 2		3
1	other (planted)	609	
2	Turpentine (W)	1	
2	Tallowwood (W) - schd 2		30
2	Flooded Gum (W)	1	
2	Jacaranda (W)	1	
2	Forest Red Gum (planted) - schd 2		28
2	other (planted)	215	
3	Forest Red Gum (planted) - schd 2		34
3	Pink Bloodwood (W)	1	
3	Flooded Gum (W)	1	
3	other (planted)	152	
4	Forest Red Gum (planted) - schd 2		19
4	other (planted)	220	
	TOTAL	1226	138
	W = Windrow tree		

Attachment C: Circular B35 – decision flowchart

