



## ***Rivendell Botanical Services***

ABN: 27232841731

***Nursery - Plant Research – Ecological Restoration***

***ph: 02 6679 9000 mob: 0458 127 107 email: jogreen@nrg.com.au***

Marek Holin  
Project Planner  
NSW Department of Planning and Infrastructure  
23-33 Bridge Street  
Sydney NSW 2000

October 31 2011

Dear Marek,

**Re: Submission to Residential Subdivision 'Bayside Road, Brunswick Heads' Application No. 05\_0091**

This submission is written to convey strong concerns about the abovementioned application and the impacts on the coastal ecosystems contained within the location of the proposed works. As the principal botanist and ecologist for Rivendell Botanical Services, plus a background for over 15 years in Landcare, wetland management and a PhD in coastal ecology, I have extensive expertise in the management and restoration of native vegetation within coastal Byron Shire.

*My strongest concerns relate to the failure of the environmental impact assessment to address the significance of the **coastal vegetation** on the site which will be severely reduced by the development. Recent management techniques such as the slashing of the site, while appearing to diminish the community value have appeared to have facilitated an increase in the natural biodiversity and therefore increased high conservation significance of the heathland vegetation. The assessment shows inadequate mitigation and offset measures to compensate for the loss of this now rare coastal community.*

Additionally there is a lack of concern for threatened fauna on the site. It appears that this development will cause a significant loss of wallum froglet habitat, as the habitat loss is grossly understated in the assessment and there are inaccurate claims of net habitat gain and inadequate offsets. My other concerns relate to the failure of the assessment to adequately address the significance of the Endangered ecological community '**Swamp Sclerophyll**' present on the site.

---

***P.O. Box 3105 Uki 2484  
830 Commissioners Creek Rd, Commissioners Creek, 2484***

The areas of slashed heathland (Vegetation Types 3b & 3c in JWA 2011) are of very high conservation significance. Although the structural composition of these vegetation types has been modified through slashing, these vegetation types are considered of very high conservation significance given:

- they have a diverse floristic composition and contain a significant proportion of species representative of adjacent areas of undisturbed wallum heathland;
- many additional species, which are not present above-ground, are likely to persist on the site as soil-stored seed;
- the original structural and floristic composition would likely return to the site following cessation of slashing; and
- the vast majority of the vegetation is virtually free of environmental weeds.

Despite ongoing slashing, the vegetation of the site has largely persisted on the site intact. And despite a modified structural composition and the reduced abundance of some larger species, the vegetation has retained a high degree of resilience and is likely to recover rapidly if freed from the suppression of the slashing regime.

Importantly, the vegetation is consistent with the definition of 'native vegetation' under the *NSW Native Vegetation Act 2003*, given it includes the following types of indigenous vegetation:

- trees (including any sapling or shrub, or any scrub), understorey plants, groundcover (being any type of herbaceous vegetation), and plants occurring in a wetland.

The increasing awareness of the values of native vegetation in the local population has not been given credibility by this assessment. Recent studies have highlighted the desire of a growing number of people to live near a natural environment, contrary to the artificially landscaped environments of other areas. As such, as an expert in the growing field of ecological restoration and management, I would recognise that significant floristic components of the community remain; and the site retains a good potential for natural regeneration. This consideration for the values of native vegetation has not been addressed by the assessment and planning for the development.

Kind regards



Dr Jo Green

Rivendell Botanical Services