

Draft Swift Parrot Species Management Plan Engagement Summary



Central
Coast
Council

Council prepared a draft Swift Parrot Species Management Plan (the Plan) to help protect the endangered Swift Parrot species on the Central Coast, while still supporting sustainable growth across our region.

The Swift Parrot depends on healthy habitat to survive during its migration to the eastern Australia mainland during autumn and winter. This Plan covers all areas of potential and known Swift Parrot habitat on the Central Coast, including on private and public land.

Between 13 July and 10 August 2026, the Plan was on public exhibition for community feedback. Community feedback will help Council resource the appropriate actions and understand where clarification or refinement may be required.

The community could share their feedback by:

- Completing the online submission form
- Writing to Council via email or post

Engagement Results

Feedback revealed strong community support for the protection of Swift Parrot habitat. Respondents shared their memorable experiences spotting these birds and emphasised the Central Coast's important role in supporting the survival of this endangered species. Respondents supported the intention of the Plan while offering insights and suggestions to strengthen it.

The key themes from the feedback were:



Protecting existing Swift Parrot habitat is the highest priority, including Kincumber wetlands



Habitat protection should be better integrated into planning and development decisions



Strengthen commitments, targets and reporting requirements in the Plan



Clarify statutory context of the plan and relationship with the Central Coast Strategic Conservation Plan

How you connected



A total of **208** submissions received. **194** online and **14** via email



Your Voice Our Coast
1015 views



The plan was downloaded
253 times



Facebook – **11,683** people were reached, generating **108** interactions



Instagram - **617** people were reached, generating **24** interactions



Targeted stakeholder email delivered to **52** community groups with a registered interest in environment



eNews - Delivered to **21,652** recipients



Coast Connect print – Readership of **62,000+**

Who we heard from

We received **a total of 208 submissions** during the exhibition period, including 194 online submissions and 14 submissions via email. Interestingly, based on the online submission form, we heard the most from respondents who are from **Kincumber** (9%, n=16) and **Umina Beach** (7%, n=12).

Based on the feedback, it was also clear that we heard from a range of **community members, community organisations and environmental groups who are passionate about Swift Parrots**, wildlife and habitat protection. Respondents shared their memorable experiences spotting Swift Parrots, their views on how special it is to witness these birds, and how important the Central Coast is to the survival of these birds.

What we heard

Overall, there was strong support for the protection of habitat to ensure the Swift Parrot can survive. While support and appreciation for Council's efforts to protect this species and habitat was expressed, respondents shared key insights and recommendations to strengthen the Plan. Key themes from the feedback are explored below.



ID: Swift Parrot Photo credit: Chris Tzaros

Action priorities

When asked to select the top three recovery actions that are the most important for Council to implement, respondents showed a **strong preference for preventing habitat loss through planning and development decisions** (93%, n=177), ensuring impacts to habitat are avoided as much as possible (77%, n=146), and restoring and creating habitat (51%, n=96) (Figure 1).

Educational activities and workshops and adding parrot habitat to Council's online mapping tool were lesser priorities (8%, n=16 and 10%, n=19 respectively), however these options were also supported in the open-ended feedback.

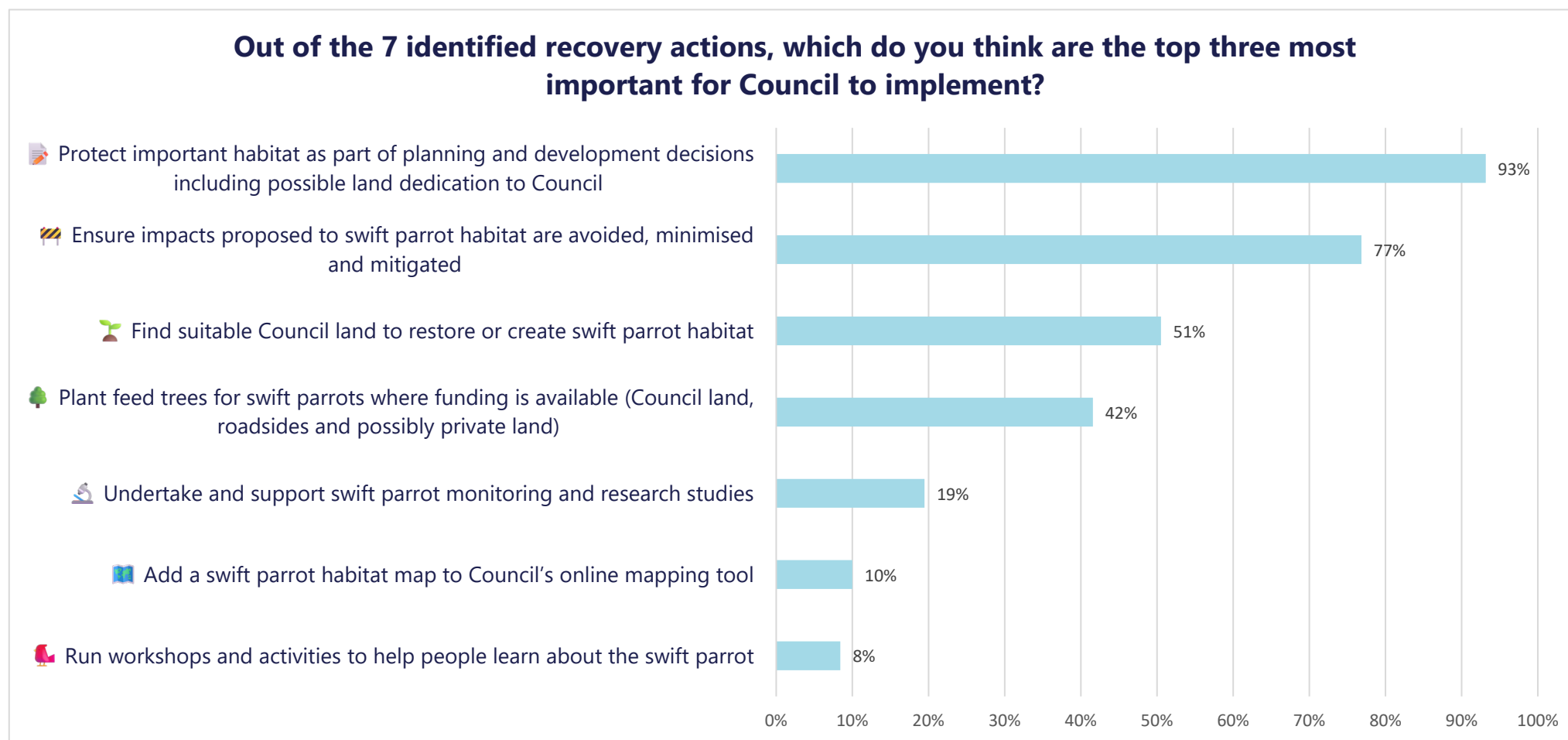


Figure 1: Action priorities, Online survey on Your Voice Our Coast, 13 July to 10 August, 194 responses. *Note: Respondents could select their top three options, so total percentages do not equal 100.

Key themes



Protecting existing Swift Parrot habitat is the highest priority

The strongest and most consistent message across submissions was that protecting existing habitat, particularly mature flowering eucalypts and known feeding areas, is the highest priority (76 specific mentions). While many respondents also supported Council acting to restore or create further habitat, respondents emphasised that mature habitat is irreplaceable because new plantings can take many years to reach maturity and become a reliable food source.

There were 27 specific mentions of Kincumber wetlands/bushland and the potential supermarket development. These respondents noted the presence of Swift Parrot habitat on the site and the importance of its preservation

Example comments:

"Once these habitats are cleared or fragmented, they cannot simply be replaced or quickly recreated. It takes decades for flowering eucalypts to mature and provide the abundant nectar that Swift Parrots depend on, making the protection of existing habitat essential."

"The Central Coast is an essential rest and feeding area for the swift parrot on its migration from Tasmania. Mainland swift parrot populations also take advantage of this feeding area. Mature trees of specific species that form part of their preferred diet are located on the Central Coast. Trees which can not easily be replaced, as they take decades to grow to a point that they can support the swift parrot population in a meaningful way. The swift parrot is already endangered, and council policies need to ensure that their habitat is protected."

"Protect the Kincumber wetlands. Do not allow development on a site that already provides habit for swift parrots as well as many other fauna. Save what we still have, it will save you dollars in the long run. Why tear apart what nature has created."

"Kincumber is one of the native bushland areas that forms part of the network of flowering eucalypt habitat across the Central Coast, providing important feeding habitat for the critically endangered Swift Parrot. No brainer don't mess with swift parrot habitat."

ID: Swift Parrot eating flowering eucalyptus. Photo credit: Michael Todd



Habitat protection should be better integrated into planning and development decisions

There were strong calls for better integration of habitat protection into strategic planning and development decisions. There were 25 specific mentions of the need for stronger regulations or the outright banning of habitat tree removal for private developments. Some respondents also questioned inconsistencies with the Plan and other Council strategic documents such as the Local Strategic Planning Statement (LSPS), which was also on public exhibition during this time, with calls for the LSPS and other strategic documents to include habitat protection (n=3).

Example comments:

"The first step is biodiversity protection. It is all well and good to restore afterwards but the initial habitat needs to be protected at all costs. Developers will have to make accommodations for the fact that their development is second to an endangered species."

"All planning should prioritise the health of the planet and biodiversity, including Swift Parrot habitat. Don't let anyone shortcut planning, don't let trees be removed without really good reason! It's not good enough to buy credits or plant saplings to replace fully grown habitat trees."

ID: Spotted Gum Forest

"It's great to see that council is taking action to try and protect our precious wildlife. If implemented then I hope that guidelines will actually be followed as we have seen time and time again when environmental considerations are overlooked in favour of development not only by authorities but by developers that ignore directions and just go ahead and do what they like. Unfortunately if they actually get a fine they know it won't really affect them too much and they don't care. Again thank you for trying to help preserve this beautiful bird."



Strengthen commitments, targets and reporting requirements in Plan

Some respondents recommended elements within the plan such as the measurable targets, habitat mapping, monitoring and public reporting be strengthened. While environmental groups generally sought stronger protections and regulations in the Plan, industry stakeholders called for greater clarity, consistency and alignment with existing legislation.

Example comments:

"This SMP, like most species plans, mostly operates at the level of individual development applications, assess, avoid, minimise, mitigate. The plan itself notes that small-scale, sequential habitat loss, including individual trees, is causing significant cumulative impacts. That's a landscape-scale problem, and it's difficult to solve one application at a time... I'd encourage weighting the genuinely systemic actions in this plan, the habitat mapping and the ongoing monitoring in particular, more heavily than the actions Council is already required to undertake under the Biodiversity Conservation Act regardless of this SMP."



ID: Swift Parrot. Photo credit: Liz Noble

"Of significance is the lack of specific targets and measurable outcomes that would ensure the goals /priorities to be implemented are specific and accountable and cannot be weakened by commercial interest groups ignorant or disinterested in a genuine plan to protect this highly endangered and important bird species the migratory Swift Parrot and key habitats. Commit to measurable targets that specify the area of

trees preserved and protected each year, deadlines for implementation and funding to achieve the priorities and to fund more compliance staff to follow up when protected trees are removed illegally.”

“How can this draft plan include timely targets so that recovery actions and performance can be independently and effectively audited with Council held to account... the timing of this plan to review in 5 years is totally inadequate given the speed at which development is destroying crucial survival habitat and in no way represents adaptive and mitigating action relevant to climate change responsiveness and responsibilities. The plan needs real targets, measurable and funding which can be measured and followed up with compliance actions.”



Clarify statutory context of the plan and relationship with the Central Coast Strategic Conservation Plan

We received feedback about the unclear legal status of the Plan and the community were interested to understand how the Plan would apply to the draft Central Coast Strategic Conservation Plan.

Example comments:

“The draft Plan does not clearly explain its legal status”.

“Keep the SMP within the Biodiversity Conservation Act 2016 and Biodiversity Assessment Method framework”.

“The SMP does not state how it would interact with The Department of Planning’s Draft Strategic Conservation Plan, which remains a draft document currently under assessment”.

Council’s response

Due to the large volume and variety of content contained within community feedback, not every issue or theme can be included and responded to in the following table, however all feedback has been read and will be considered by the project team.

This phase of engagement sought feedback on the draft plan, to identify where clarification, refinement or improvement may be appropriate prior to finalisation. Feedback has been reviewed by the project team and considered in the development of recommendations to be presented to Council for consideration. The final decision is made by the elected Councillors at a formal Council meeting and may also be influenced by available funding, priorities and delivery programs.

Theme	Council’s response
Protecting existing Swift Parrot habitat is the highest priority	Council acknowledges strong community support for prioritising the protection of existing Swift Parrot habitat. The final Plan will continue to emphasise avoidance of habitat loss as the preferred management response.
Protecting Kincumber wetlands from potential development	Council acknowledges community concern about Kincumber wetlands and its value as part of the broader network of swift parrot habitat on the Central Coast. Any development proposal affecting this area would need to be assessed on its merits by the relevant consent authority under both planning and biodiversity legislation, having regard to site-specific ecological information.

Habitat protection should be better integrated into planning and development decisions	Council agrees that Swift Parrot habitat protection needs to be considered early and consistently in land use planning, development assessment and Council works. The Plan will be refined to more clearly explain how habitat mapping, site assessment and avoidance measures are to inform planning and development decisions, within the applicable statutory framework.
Strengthen commitments, targets and reporting requirements in Plan	Council notes requests for clearer commitments including measurable targets. The final Plan will be reviewed to improve the clarity of recovery actions, responsibilities, monitoring and reporting arrangements, noting that delivery will depend on Council decisions.
Provide clear statutory context on how the plan applies to planning decisions	The SMP will be amended to expressly describe its status as an adopted Council policy and decision-support document. It provides guidance on how Council will interpret and apply scientific evidence and statutory requirements, but does not override legislation or create separate legal obligations.
Clarify how the SMP would apply to the draft Central Coast Strategic Conservation Plan (CCSCP)	The draft CCSCP is currently being considered by the NSW Government and may be finalised by the end of 2026. If biodiversity certification applies to land under that plan, biodiversity impacts for future development in those areas will generally have already been assessed through a broader strategic process. This means the land use planning provisions in the Swift Parrot Species Management Plan will not apply to areas covered by the CCSCP, or generally to other biodiversity-certified land.

What's next?

Council is currently reviewing all submissions received and making updates to the Plan. The matters raised through public exhibition will be considered in greater detail as part of the finalisation process.

A revised Plan that reflects amendments made in response to submissions and a summary of Council's response to submissions is scheduled to be presented for consideration in late 2026 or early 2027 to Council's Environment and Planning Committee.

Find out more and stay up to date at
[**yourvoiceourcoast.com/protecting-swift-parrot-species**](https://yourvoiceourcoast.com/protecting-swift-parrot-species)

September 2026

Appendix

This appendix contains verbatim comments provided during consultation through the online survey and email submissions. It is included to ensure full transparency of community feedback. All comments have been de-identified and or redacted to protect respondent privacy.

Online submissions

Is there anything else you'd like to share about Swift Parrot conservation or habitat protection?

Permission decisions to remove mature trees on private land , plus council land, so that driveways, renovations, pools, carports or sheds can be progressed need to be considering whether such trees are part of habitat corridors for swift parrots. Does Council ensure that private developments are fully informed of the ramifications of contributing to the destruction of critical habitat trees. Are designers ever asked to reconsider designs to allow vegetation to remain and could council offer funding so that alternative designs could be raised which are more considerate of swift parrot habitat...having plans revised is costly, even if planners do become newly informed of swift parrots and associated habitat. However, a funded "re-design" then becomes a positive experience in which there is a vested interest in supporting the swift parrot habitat and ongoing interest in it.

Please consider Council land in Pearl Beach for planting Swift Parrot feed trees. We have a very active Arboretum, Bushcare and Dunecare who will care for them.

We already have a number of the identified Swift Parrot Trees in the Arboretum

Education is important, the land with suitable habitat for nesting, roosting, feeding and breeding is the most important. Reduce the number of trees that get chopped down for people and council to build massive properties which take away from wildlife corridors and habitat.

As these parrots migrate to our area we have a responsibility to protect and increase their habitat

Saving existing feed trees and planting succession trees to maintain habitat are clear priorities if we are to protect this species.

The MP must acknowledge that suitable trees for producing food and habitat for the Swift Parrot need to feed from mature old trees and so the mitigation strategy is ineffective for decades- time the Swift Parrot does not have. Developers must not be allowed to remove large habitat yielding trees - no exceptions

This is clearly documented in all the scientific research and stated in the National MP for saving the Swift Parrot

We need to immediately protect existing Swift Parrot habitat - both where birds have been sighted and habitat with suitable feed trees. Just recently, habitat destruction has been shown as the major threat to Swift Parrots, not Sugar Glider predation.

I have done Swift Parrot Surveys on the Central Coast over the past 2 years, and it has reinforced the importance of all these pockets of suitable and previous Swift Parrot habitat. Swift Parrots can turn up anywhere - even where there are just pockets of suitable feed trees, as we saw this year with birds at Umina.

Now that H5N1 Bird Flu has inevitably arrived, we need to ensure the protection of all existing suitable habitat on the Central Coast. As a migratory bird, with a very small population that congregates in groups while migrating, the Swift Parrot is going to be incredibly vulnerable to extinction via Bird Flu.

Over the past decade, the Central Coast has been incredibly important in hosting Swift Parrots during their Winter migration. The groups observed on the Central Coast are a large proportion of the estimated total population.

Given the imminent risk from Bird Flu, I think the highest priorities are to protect all the suitable existing habitat we have, right now. As a background activity, it would be great to plant more feed trees, as has happened at Central Coast Wetlands, and to do education pieces on those species to the general public.

The Central Coast is incredibly important to the future of these birds. For there to be sufficient habitat to host the birds and provide food over weeks (such as this year at Bateau Bay) is an incredible thing, but also a responsibility that we should take seriously.
I have been lucky enough to have seen them twice on Central Coast. Bateau Bay this year and 2024 in the car park at REDACTED at Mt. Penang. We need to have mass planting of all their food trees in as many places as possible. There is room for small forests in a lot of places especially at Mt. Penang. There are a multitude of other species that feed from these flowering gums too, including Flying foxes and insects which then feed other birds.
Bring back the law that makes it illegal to remove or poison large trees in your own yard without council consultation. It's distressing how many we have lost in the Toukley region and the bird life has changed. We no longer have owls calling at night let alone Swift Parrots stopping by.
Please do all you can to protect swift parrots and their habitat. It's so important to see where they are and to fully protect their habitat. This helps other bird animal and plant species as well.
I have spotted and photographed Swift Parrots in the Blackbutt trees in (REDACTED Bateau Bay) in July this year. I believe any effort to protect these important habitual and food source trees for the Swift Parrots must be at the forefront of all proposed council work/maintenance.
PLEASE PLEASE PLEASE don't let us lose more habitat. We need our environment to let nature survive
Protecting current habitat and looking at alternatives, rather than tree removal, for any issues where trees are involved.
Planting feed trees for swift parrots is important but these will not provide feed for birds until 15 years hence. Vital to retain what feed trees we already have. List these as Significant Trees marked as Not for Removal and given genuine root zone protection if near a development site. Do not allow another Australian bird species to be diminished. Providing council land eg non play parks, to be reforested for feed trees.
Biodiversity Offset Scheme (BOS) must be disallowed to development proponents in Swift Parrot drought refugia, mapped KBAs & all areas delineated in the Crates et.al. (2025) Species Distribution model.
Thank you for drafting the plan. Please protect habitat from clearing/development. Planting feed trees/creating habitat should be additional to protecting what already exists.
Immediate Protection of habitat from future developments is an absolute necessity.
Don't let another animal go extinct :(Don't be heartless
Consider migratory paths and patterns. McDonald's Noraville proposed site on cnr Evans and Main Road would completely destroy the species on the Northern end of the coast. Oppose this development as much as possible
Council must ensure that the COSS lands are not compromised in any way, to add to existing COSS areas and to try to incorporate unutilised Council lands into the COSS system. There should be a program of eliminating weed trees like camphor laurel, privet, wild tobacco and Lantana in Council reserves and parks to be replaced with appropriate swift parrot feed trees. This is especially important where these weed infestations occur close to the COSS lands and National Parks.
Less development
Simply stop killing trees
The first step is biodiversity protection. It is all well and good to restore afterwards but the initial habitat needs to be protected at all costs. Developers will have to make accommodations for the fact that their development is second to an endangered species.
No Woolworths at Kincumber Wetlands. Kincumber is one of the native bushland areas that forms part of the network of flowering eucalypt habitat across the Central Coast, providing important feeding habitat for the critically endangered Swift Parrot. Stop destroying habitat!!!!
Also, I can't understand why you are consulting the community, ie. everyday people who may know nothing about birds, for something that scientists, ecologists, ornithologists should be consulted for? Consult the experts and actually listen to their advice!!!!

We have abundant trees all over the coast and major state forests for all birds. Good level land should be for practical carefull development
I could only select 3 of the 7 actions above but I think it is also important to "ensure impacts proposed to swift parrot habitat are avoided, minimised and mitigated". The other items are also important but the priority is to maintain the parrots' habitat. No point educating people about the bird if there's no food for it to eat nor suitable trees to live in. Thank you, CCC, for taking steps to protect this lovely species. I hope you are successful.
Kincumber's and Kariong's native bushland form part of the network of flowering eucalypt habitat found across the Central Coast. These areas contain mature trees, including Swamp Mahogany and other nectar-producing eucalypts, that can provide valuable feeding resources for the critically endangered Swift Parrot during its annual migration from Tasmania.
Once these habitats are cleared or fragmented, they cannot simply be replaced or quickly recreated. It takes decades for flowering eucalypts to mature and provide the abundant nectar that Swift Parrots depend on, making the protection of existing habitat essential.
The Central Coast is one of the most important winter feeding areas for the Swift Parrot. The species migrates from Tasmania each year in search of flowering eucalypts, particularly Swamp Mahogany, Spotted Gum, Forest Red Gum and Blackbutt, which provide the nectar it depends on for survival. Because flowering varies from year to year, every remaining patch of suitable habitat is important.
In 2002, most of the mainland Swift Parrot population was recorded feeding in urban Swamp Mahogany on the Central Coast, demonstrating just how significant this region can be when conditions are right.
REDACTED in Umina Beach, and there are two very mature Eucalyptus robusta trees there, which may provide good nesting habitat for the Swift Parrot. I just wanted to bring these trees to your attention.
All the 7 actions could be done.
The Central Coast is an essential rest and feeding area for the swift parrot on its migration from Tasmania. Mainland swift parrot populations also take advantage of this feeding area. Mature trees of specific species that form part of their preferred diet are located on the Central Coast. Trees which can not easily be replaced, as they take decades to grow to a point that they can support the swift parrot population in a meaningful way. The swift parrot is already endangered, and council policies need to ensure that their habitat is protected.
The most important thing is not to lose the habitat and old growth trees we currently have and then to add to this over time with new plantings and by restoring degraded habitat - but large trees take a long time to grow so we cannot rely on restoration alone to address the problem.
All this actions listed are all extremely important. I wish I could select them all but the highest priority is ensuring that current Swift Parrot habitat is actually protected. This means from development and from destruction from other factors such as invasive species, illegal dumping ECT. Thankyou for putting out this pole. I hope we can continue to protect Swift Parrots.
Minimise development and focus on infrastructure.
Habitat protection is the most important and easiest way to save any endangered species
Stop allowing land clearing for housing. There is enough housing on the coast already. ban airbnb if you want more houses for locals.
Stop allowing new builds to cut down existing trees, its disgraceful that you allow it
These options on your survey are very limiting. The public should be asked what they want, not given a list of very limited options.
Yes - please do not allow destruction of the Kariong Kincumber wetlands
So many people have volunteered time and effort into conserving swift parrot habitat. Its a slap in the face that the council would them consider destroying one of their habitats like the kincumber wetlands

Preserving land that provides habitat for Swift Parrots should be a priority. Protecting native forests from clearing, reducing the impacts of development, and ensuring council planning decisions safeguard important breeding and feeding areas are essential. Expanding protected areas, restoring degraded habitat, and creating wildlife corridors between forest patches will help support the long-term survival of this critically endangered species.

Any known swift parrot habitats should be preserved. Development should not occur in these identified areas at all.

I think that patches of bush land that are already known to be habitat and provide food and shelter for the swift parrots should be protected as well, like the Kincumber wetlands, Kariong and Bateau Bay, where there have been sightings recently.

Protecting existing habitat is priority then increasing habitat.

I am incredibly concerned about the proposed Development Application (DA) at REDACTED, and I am writing to state unequivocally that Council must refuse it. Approving this DA fundamentally violates the core objectives of protecting the critically endangered Swift Parrot.

The proposal demands a massive, irreversible scale of tree clearing, intending to wipe out 75% of the block's 220 native trees and destroy 16 established tree hollows"irreplaceable habitat structures that take over a century to form.

Under Section 7.16 of the NSW Biodiversity Conservation Act 2016, consent authorities are legally obligated to refuse a DA if it is determined to cause a Serious and Irreversible Impact (SAIL) on a threatened species. The Swift Parrot is an explicitly listed SAIL entity. Wiping out critical, contiguous winter foraging habitat on the Gwandalan and Summerland Point Peninsula constitutes a textbook definition of an irreversible impact that cannot be mitigated by generic offset credits.

Furthermore, there is clear legal precedent for refusal on these grounds. The REDACTED has repeatedly thrown out major residential proposals when a developer's Biodiversity Development Assessment Report (BDAR) fails to prove true "avoidance" of ecological damage, notably highlighted in cases like REDACTED v REDACTED. More locally, regional developments have faced strict refusal or severe cutbacks specifically because of their impact on critical avian corridors.

If Council is serious about its Draft Swift Parrot Species Management Plan, it must apply these exact legal principles here. Fragmenting this high-conservation-value canopy for a standard residential subdivision ignores established environmental case law. I urge Council to reject this DA entirely.

place greater emphasis on retaining mature nectar-producing trees;
* require habitat impacts to be considered when development is proposed;
* encourage restoration of native vegetation to improve habitat connections; and
* support ongoing monitoring of Swift Parrot sightings during winter.

In addition to the above items we need to undertake a Swift parrot research and monitoring program to track existing population.

Protect what we have eg KINCUMBER WETLANDS
Revegetate what we've lost.
They fly so far, they need food upon arrival

The management plan is more concepts and decided and committed actions. Commitments are required.

Education is really important for the public to understand these special birds and dependent they are to have suitable areas set aside and protected to supply their numbers to not fade away and disappear.

Kincumber wetlands is vitally important. It should be protected at all costs from development

Kincumber's and Kariong's native bushland form part of the network of flowering eucalypt habitat found across the Central Coast. These areas contain mature trees, including Swamp Mahogany and other nectar-producing eucalypts, that can provide valuable feeding resources for the critically endangered Swift Parrot during its annual migration from Tasmania.

Once these habitats are cleared or fragmented, they cannot simply be replaced or quickly recreated. It takes decades for flowering eucalypts to mature and provide the abundant nectar that Swift Parrots depend on, making the protection of existing habitat essential.

The Central Coast is one of the most important winter feeding areas for the Swift Parrot. The species migrates from Tasmania each year in search of flowering eucalypts, particularly Swamp Mahogany, Spotted Gum, Forest Red Gum and Blackbutt, which provide the nectar it depends on for survival. Because flowering varies from year to year, every remaining patch of suitable habitat is important.

In 2002, most of the mainland Swift Parrot population was recorded feeding in urban Swamp Mahogany on the Central Coast, demonstrating just how significant this region can be when conditions are right.

Save Kincumber wetlands, save the flowering Eucalypt trees, save swift parrots !

Think of preserving nature and human wellbeing rather than competing with REDACTED' just greed !!!!!

As with all wildlife conservation, wildlife corridors and suitable areas must be kept free from change and kept native. Large buffer zones from human interference must be implemented. Bushland must be kept natural.

Why are we having this discussion. Do whatever it takes to protect.

Local wildlife and flora education campaign would be helpful for people to learn about our local wildlife and how they too can attract and support them eg by planting local species in their yard

I think it is insane we need a survey to protect our wildlife ðŸ™ª'ðŸ™ª'

The Local Strategic Planning Statement LSPS needs to include protection of swift parrot habitat

The biggest threat to breeding swift parrots isn't the journey they make''it's what happens after they arrive. In Tasmania, introduced Sugar Glider can climb trees at night, enter nesting hollows, and kill adult females, chicks, and eggs. In some years, they can wipe out the majority of nests in affected areas.

The "Smart Nest Tree" System

Instead of trying to remove sugar gliders from huge forests, protect the individual trees that matter most.

1. AI Tree Collar

A durable collar is wrapped around the trunk about 2''3 metres above the ground.

Thermal cameras and infrared sensors detect climbing animals.

AI distinguishes between sugar gliders, possums, birds, insects, and humans to avoid false alarms.

2. Humane Deterrents When a sugar glider approaches, the collar activates:

Gentle vibrations through the bark.

Flashing infrared or LED lights.

High-frequency sounds that discourage gliders but have minimal impact on birds.

A smooth rotating sleeve that makes climbing difficult without harming the animal.

The goal is simply to convince the glider to choose another tree.

3. Nest Monitoring A tiny camera inside the nesting hollow would:

Count eggs and chicks.

Monitor chick growth.

Alert researchers if a predator enters.

Record breeding success without frequent human disturbance.

4. Solar Powered A small solar panel mounted high in the canopy powers the system year-round, with batteries providing energy overnight when predators are active.

5. Connected Forest Every protected tree communicates through a low-power wireless network, allowing researchers to see:

Which nests are occupied.

Which trees are under attack.

Predator activity hotspots.

Breeding success across the forest in real time.

Why this could work

Instead of trying to protect millions of hectares of forest, conservationists would focus on a few hundred of the most valuable nesting trees each breeding season. If the current breeding success in vulnerable areas is around 20%–30%, increasing it to 70%–80% through targeted protection could dramatically accelerate the recovery of the swift parrot population over the coming decades.

The concept combines conservation biology, renewable energy, AI, and non-lethal wildlife management into a practical "guardian tree" that protects one of Australia's rarest birds exactly where it is most vulnerable.

Kincumbers native bush land is an area that forms a proportion of the eucalypt habitat across the Central Coast, this is a significant feeding habitat for the critically endangered Swift Parrot.

This is a genuinely well-evidenced plan, and the population trend it responds to is stark, functional extinction projected within 20 years, even before further mainland habitat loss is factored in.

One thing worth flagging. This SMP, like most species plans, mostly operates at the level of individual development applications, assess, avoid, minimise, mitigate. The plan itself notes that small-scale, sequential habitat loss, including individual trees, is causing significant cumulative impacts. That's a landscape-scale problem, and it's difficult to solve one application at a time.

The habitat mapping in this plan already shows swift parrot habitat concentrated around Kincumber, the Brisbane Water and Bouddi interface, and the Tuggerah Lake and Lake Munmorah foreshores. These are also core reserve and corridor areas for several other threatened species on the Central Coast. A planning mechanism protecting habitat connectivity at that landscape scale, alongside the current per-application assessment, would benefit swift parrot habitat and a much wider set of species at once, rather than each threatened species needing its own separate planning response.

On that basis, I'd encourage weighting the genuinely systemic actions in this plan, the habitat mapping and the ongoing monitoring in particular, more heavily than the actions Council is already required to undertake under the Biodiversity Conservation Act regardless of this SMP.

I work in conservation strategy on the Central Coast and am happy to discuss further if useful.

The swift parrot integrates well with people. Put people & families first.

Move forward with developers to build more homes.
It's essential to preserve habitat by engaging the community' verge planting and wildlife corridors are imperative
Wind turbines should also be included in conservation measures. Many many birds are killed by the rotating blades.
Kincumber is one of the native bushland areas on the Central Coast which forms part of the network of flowering eucalypt habitat providing important feeding habitat for the critically endangered Swift Parrot. The survival of this species is dependent on us protecting this corridor of suitable habitat
Protect our natural habitat for wildlife should be part of Central Coast Councils plan for the next 20 years and more.
All planning should prioritise the health of the planet and biodiversity, including Swift Parrot habitat. Don't let anyone shortcut planning, don't let trees be removed without really good reason! It's not good enough to buy credits or plant saplings to replace fully grown habitat trees.
Make sure development applications that destroy swift parrot habitat are not progressed to councils or planning panels.
With the swift parrot being critically endangered, all efforts should be employed to protect and assist them. I believe that the native bushland in Kincumber is one area of the Central Coast containing a flowering eucalypt habitat which provides a feeding area for the parrots to thrive. This is one area which could be protected for the benefit of the parrots.
It should be obvious that we avoid destroying any more important habitat land. Why do councils - everywhere - not give a damn????
Swift Parrots fly from Tasmania to the Central Coast on a yearly basis. If they cannot find enough food in this area they will be unable to fly back and their population will decline. Please help to protect their habitat
The conservation of all known habitats of swift parrots and other vulnerable species needs protecting
I live next to a Reserve and see many native birds but no Swift Parrots. Too many foxes in REDACTED Reserve
Kincumber is an important area of Swift Parrot habitat. It is critical that the wetland area is protected from any possible development.
It's great to see that council is taking action to try and protect our precious wildlife . If implemented then I hope that guidelines will actually be followed as we have seen time and time again when environmental considerations are overlooked in favour of development not only by authorities but by developers that ignore directions and just go ahead and do what they like. Unfortunately if they actually get a fine they know it won't really affect them too much and they don't care. Again thank you for trying to help preserve this beautiful bird.
All of the above 7 are important! It is wonderful to see you are developing a strategy to save these beautiful birds from extinction. We need people like you in Victoria.
Prioritise and promote the end of rampant deforestation of old growth trees that destroys their habitat.
It is important to protect their habitat. In Kincumber there are plans to destroy this to build a Woolworth supermarket. The Kincumber Wetlands provide for many endangered wildlife. This land should be protected.
Don't destroy the natural habitats of our beautiful wildlife Leave wetlands alone
All are important, but nothing is more important than protecting already established habitat!
As a Central Coast resident, I believe protecting native forests and bushland must be a higher priority. The Swift Parrot is one of Australia's most endangered birds, and habitat loss continues to threaten its survival. Stronger protection of mature forests, better management of remaining habitat, and ongoing restoration are essential if we want to prevent further declines. Protecting these habitats doesn't just benefit the Swift Parrot""it also supports countless other native plants and animals and helps preserve the natural environment for future generations. We all have a responsibility to ensure these unique ecosystems are protected before it's too late.
It would be helpful if Council ensured that the continued tree felling in suburbs was controlled and monitored. Too many trees in suburbs like Kariong are constantly being cut down by residents.

Identify and preserve wetlands in the Central coast area and places known to already contain species which feed and support the swift parrot . Thanks for the opportunity to respond.
Please protect the Kincumber Wetlands and Kariong sacred lands from multinational corporations, both areas house numerous flora and fauna species. Mother Nature is imperative!!! #ALLcreaturesgreatANDsmall ðŸ™ ðŸ½
Can we give people the trees the parrots feed on so that they can plant them in their backyards and communal areas?
established habitat is far more valuable than creating new
Council needs to prioritise wildlife and the environment in all planning decisions. This is not anti-development but smart development where what is important in preserving is considered in everything we do. Once gone, these environments cannot be replaced.
To liaise with REDACTED at REDACTED to identify the current trees that Swift Parrots visit every year to ensure they are not chopped down and removed. For instance, 2 trees in REDACTED Bateau Bay have suffered in the last 8 years. One totally healthy tree chopped down and the other is looking very unwell 8 years afterwards and needs to be assessed and treated.
The other options are also useful but I am limited to the 3 most important.
It should be a no brainer to protect areas where parrots have been identified. Community should always be consulted when any tree or habitat removal is planned, too often patches of trees are simply removed without community consultation. Just because there are legal loopholes it does not make it right.
Any little step in helping the swift parrot to survive on the coast is a step forward
Let's take swift parrot survival seriously.
Kincumber is one of the native bushland areas that forms part of the network of flowering eucalypt habitat across the Central Coast, providing important feeding habitat for the critically endangered Swift Parrot
I'm sure you're already aware but to reiterate that the proposed Woolworths on the wetlands at Kincumber is one of the native bushland areas that forms part of the network of flowering eucalypt habitat across the Central Coast, providing important feeding habitat for the critically endangered Swift Parrot. The wetlands are essential to the ecosystem and environment, many local conservationists and environmentalists are opposed to desecrating the wetlands to build another supermarket. Hopefully CCC will do the right thing and oppose this needless development. Thank you.
Biodiversity is essential to long term and self sustainable green spaces. Therefore protecting these birds and their environment is vital to the ecosystems of the Central Coast.
Habitat protection applies to all creatures not just parrots,save them all thankyou.
Protect Kincumber Wetlands and ensure there is no development on natural bushland
Kincumber is one of the native bushland areas that forms part of the network of flowering eucalypt habitat across the Central Coast, providing important feeding habitat for the critically endangered Swift Parrot. No brainer don't mess with swift parrot habitat.
Protect the Kincumber wetlands. Do not allow development on a site that already provides habit for swift parrots as well as many other fauna. Save what we still have, it will save you dollars in the long run. Why tear apart what nature has created.
Yes kincumber wetlands are so important to all creatures that can be identified in this reserve. Frogs birds flowers and many more. Please leave this small habitat in to these lovely creatures. That's is why I moved to this village
Kincumber forms part of the flowering ecualyptus environment which support swift parrots, therefore the proposed developments of bush for a Woolworths must be stopped to save the precious environment for swift parrots and other creatures that call this habitat home.
Kincumber's and Kariong's native bushland form part of the network of flowering eucalypt habitat found across the Central Coast. These areas contain mature trees, including Swamp Mahogany and other nectar-producing eucalypts, that can provide valuable feeding resources for the critically endangered Swift Parrot during its annual migration from Tasmania.

Once these habitats are cleared or fragmented, they cannot simply be replaced or quickly recreated. It takes decades for flowering eucalypts to mature and provide the abundant nectar that Swift Parrots depend on, making the protection of existing habitat essential. The Central Coast is one of the most important winter feeding areas for the Swift Parrot. The species migrates from Tasmania each year in search of flowering eucalypts, particularly Swamp Mahogany, Spotted Gum, Forest Red Gum and Blackbutt, which provide the nectar it depends on for survival. Because flowering varies from year to year, every remaining patch of suitable habitat is important. In 2002, most of the mainland Swift Parrot population was recorded feeding in urban Swamp Mahogany on the Central Coast, demonstrating just how significant this region can be when conditions are right.
The Swift Parrot has been seen feeding in the Kincumber Wetlands that Woolworths wants to build on. In addition to it being a vital place to absorb flooding in the area it also supports these and other species. The area is vital to the Swift Parrots and the community.
Kincumber is one of the native bushland areas that forms part of the network of flowering eucalypt habitat across the Central Coast. This is important because it provides important feeding habitat for the critically endangered Swift Parrot and must be protected.
The Central Coast is one of the most important winter feeding areas for the critically endangered Swift Parrot. The species migrates from Tasmania each year in search of flowering eucalypts, particularly Swamp Mahogany, Spotted Gum, Forest Red Gum and Blackbutt, which provide the nectar it depends on for survival. Because flowering varies from year to year, every remaining patch of suitable habitat is important. In 2002, most of the mainland Swift Parrot population was recorded feeding in urban Swamp Mahogany on the Central Coast, demonstrating just how critical this region can be when conditions are right. Protecting mature flowering trees and connected bushland across areas such as Kincumber, Kariong and other parts of the Central Coast helps ensure these birds have the food resources they need during migration. Once these habitats are cleared or fragmented, they cannot simply be replaced.
Thank you putting out such a comprehensive plan of management for Swift parrots.
Stop native forest logging
Protect Swift Parrot habitat by retaining existing trees and all green space.
Like all wildlife, especially endangered, stop land clearing wherever possible. Do not clear and offset or mitigate. Simply do not clear land.
How is this even a question. Protect all wildlife before profits.
There is only so much further you can go with destroying the environment in the name of 'community growth', before growth will become the very least of anyone's concerns. Enough is enough.
The plight of the Swift Parrot is urgent and although the planting of trees is welcome, this solution is not fast enough and it will take time. The habitat and species of tree is very specific for the Swift Parrot and needs protection. The growth of the Central Coast is a political aspiration and should not be achieved at the expense of an extremely endangered species. With an estimated population of only about 750 individuals remaining in the wild in all areas of Australia, conservation efforts are urgently needed by all regional communities to protect this species from extinction.
Nothing that is not covered in the above 7 points.
It's on us to leave this world in a better place than we came into. We need to find better ways to cohabit with our furry friends 🐾
This needs to be taken seriously Please do not allow development near their feeding trees.
I encourage the council to share their knowledge and action plan with any other councils where there are known populations of swift parrots also needing to be protected. Also I suggest liaising with local schools as involving schools in this plan means involving the next generation to ensure future awareness and support.

Planting trees near roadside and encouraging the birds to these areas would not be suitable . Green corridors should not be roadside to avoid incidents with cars .

All the points above are very important for the protection of the species, the more people know about and care about the species, the more they will want to ensure they are safe. Education of communities is one of the most powerful tools in conservation, as when people do not know or have reason to care about a species, they won't protect it, so you have to show them the reason and persuade them to care about the Swift Parrot. It is extremely important that their suitable food source be made more abundant, particularly in protected areas like national parks (such as Bouddi and Brisbane Water) and reserves. Budgewoi, Bateau Bay, Pearl Beach, Patonga, the forests East of Wyong and a number of other locations that border great forested habitat should be completely restricted from logging as the habitat there can support the Swift parrots, as well as other threatened species like Yellow-Bellied Gliders. Any habitat protection must consider the other native wildlife present and ensure any efforts to preserve Swift Parrots are not to the detriment of other species like the aforementioned gliders or Spotted Quolls and Glossy Black Cockatoos. Feeding trees can be planted nearby to roads, but not too close where the parrots are at risk of vehicle collisions. Removal efforts for introduced predators like cats and foxes should also be put in place in some of the Swift parrot locations so as to reduce or completely remove that risk of invasive predation on the species.

I support protection of the swift parrot and engagement of the population.

Protect ALL Swift Parrot habitat as it and develop more habitat for the Swift Parrots.

These are very important birds. We need to do everything we can to help them flourish. Communities can help - but the most devastation comes from irresponsible planning decisions made by councils. Do the right thing, CCC - don't let their destruction be your legacy

These are a wonderful species and bring tourists to the area and it will be great to protect their remaining habitat. Also consider the general benefits of trees in urban environments and how they can reduce temperatures, stabilise land, provide mental health benefits

Run a workshop for teachers about the swift parrot and other key animals i your LGA and the necessary habitat and invite groups like W.I.R.E.S to present with you to improve your local habitat and help schools become involved in projects like building bird and microbat boxes. Invite men's shed members too. They might enjoy making the boxes or cutting them so kids could make them them. More birds equals more bird tourists coming into your area and spending money in your local area. Run council tour walks to manage and educate people and encourage tourists i to your area.

Birds and trees come first.

Educating people about keeping old trees. Breeding hollows take a long time to form and planting trees is a great idea, but won't help in the short term.

Protecting important habitat and finding suitable habitat to restore should be one and the same. It's short-sighted bureaucracy to suggest otherwise and exactly where council fails meeting the expectations of the community it claims to represent.

They have been seen regularly in the C3 land that makes up the Green Corridor specified in the Council's Draft Strategic Plan for the Gwandalan/Summerland Point Peninsula. This contains their preferred habitat. Despite this Council is supporting a D A at REDACTED to clear 75% of the 220 trees on the block. Most of them trees used by the parrot. Council also proposes to clear the large area of habitat on either side of REDACTED.

Swift parrot habitat must be preserved ahead of any changes to the land use with all developments completely prohibited and noted in perpetuity on council zoning maps and all Nsw electronic planning systems.

The swift parrot is truly a unique Australian bird that perhaps isn't as well known to Austrians as it should be. I think any kind of information, print or digital, should feature high quality photos of the bird because it is so beautiful and interesting and might capture the eye of people who aren't normally interested in conservation projects.

Protect habitats.

I have selected all of the recovery actions

Email submissions

Dear REDACTED,

My comments on the Central Coast Council Swift Parrot Management Plan (Plan) follow:

- 1) This Plan poses major contradictions between itself & the CCC Local Strategic Planning Statement (LSPS) regarding areas around Brisbane Water, particularly Kincumber wetlands, Point Frederick; Tuggerah Lakes & Tumby Umbi.
- 2) There is a systemic failure to recognise that cumulative habitat loss & fragmentation is the Key Threatening Factor in the extinction event now occurring; a case in point was the contemporary destruction of Swift Parrot habitat through REDACTED housing facility construction at Kangi Angi.

I look forward to a seeing evidence of a significant rewrite of this Plan addressing both of the above points as a minimum requirement.

Yours chorally,

REDACTED

Mob: REDACTED

The only way to get where we want to be in the future is to change the direction of the lifeboat we are travelling in.

Dear Council officers,

I am a resident of the Central Coast and actively participate in multiple environmental and advocacy groups including; Council's REDACTED, REDACTED and the REDACTED.

This submission highlights necessary amendments to the current draft plan to strengthen the purpose and outcomes Central Coast Council aims to achieve in this very worthy management plan of the highly endangered Swift Parrot.

Of significance is the lack of specific targets and measurable outcomes that would ensure the goals /priorities to be implemented are specific and accountable and cannot be weakened by commercial interest groups ignorant or disinterested in a genuine plan to protect this highly endangered and important bird species the migratory Swift Parrot and key habitats.

I submit that Council:

* Replace outdated mapping with more accurate and updated mapping of feeding sites for the Swift Parrots and ensure these maps inform any development needs assessments as key criteria to exclude development that would result in the removal of existing mature trees and all replacement or newer tree plantings.

This is in line with one of the 7 priorities for Council to ensure maps and research is updated and reflects accurately the areas Swift Parrots need to sustain their species for feeding and habitat protection.

* Council incorporate the National Recovery Plan for the Swift Parrot (Lathamus Discolor) 2024 to ensure regional habit is protected given the bird's migratory nature. Random or one of sightings of the species will weaken the protection to this vulnerable species on the Central Coast against any proposed development.

- * Commit to a multi-management strategy to protect existing mature trees and plant replacement trees to ensure a mix of habitat that preserves future generations of the highly endangered species of tree the Swift Parrot relies on for food and habitat.
- * Guarantee key tree species are protected and retained and specify how Council will ensure this and report on the implementation of this priority. Increase fines and compliment education and pride in retaining our Swift Parrot habitats.
- * Remove the loophole for backyard tree removal. Some tree removal on private land – including for bushfire clearing – doesn't need Council approval at all. This means backyard trees swift parrots are known to use (like the ones at Bateau Bay) can be removed with no assessment whatsoever.
- * Protect trees while the birds are actually using them. Extra protection, such as requiring development to pause noisy or disruptive works at night during the weeks when swift parrots are confirmed to be feeding at a site, on top of the standard buffer distance.
- * Ensure yearly monitoring or trigger review of the management plan if critical habitat is being removed disappearing more frequently. Land clearing represents an immediate threat to many endangered species . The proposed 5-year review is grossly inadequate given the exponential raters of land clearing in State forests and other commercial / public developments such as the Woy Woy Tip expansion proposal.
- * Commit to measurable targets that specify the area of trees preserved and protected each year , deadlines for implementation and funding to achieve the priorities and to fund more compliance staff to follow up when protected trees are removed illegally.
- * Remove all use of 'off-setting" to justify clearing existing habitats including mature trees. These are unacceptable concepts when applied to replacing existing nature habitats. It is not based on any credible and current conservation research.
- * REDACTED has determined the state offset scheme isn't working as imagined, a newly planted tree also won't be useful to swift parrots for decades – by which time the species may not have survived.
- * Council to rule out offsetting to preserve existing and therefore the best-quality habitat in an amended management plan.

Yours sincerely,

REDACTED

Draft Central Coast Swift Parrot Species Management Plan

Submission to Central Coast Council

10 August 2026

About REDACTED

REDACTED (REDACTED) is the REDACTED. We represent the leading participants in the industry and have more than REDACTED members across the entire spectrum of the industry including developers, financiers, builders, suppliers, architects, contractors, engineers, ecologists, consultants, academics and state and local government bodies. We are proud to count Central Coast Council (Council) as a valued member.

Summary

REDACTED welcomes the opportunity to provide feedback on Council's Draft Swift Parrot Species Management Plan ("draft SMP" or "Plan"). REDACTED recognises that parts of the Central Coast contain important winter foraging habitat for the migratory Swift Parrot, and REDACTED supports appropriate protection of the species.

The development industry works daily within NSW's biodiversity assessment framework and is well placed to provide practical, evidence-based feedback on how the Plan can achieve its conservation objectives while supporting sustainable regional growth and investment. We offer this submission constructively and look forward to working with Council to improve the draft.

REDACTED supports clear, consistent and evidence-based assessment rules, and we support the Plan's objective of protecting the Swift Parrot and providing greater guidance and clarity on local management measures including development assessment.

However, we do not support the SMP being adopted in its current form. As drafted, it extends well beyond the existing statutory biodiversity assessment framework and risks unnecessarily sterilising large areas of the Central Coast from future

urban development, with significant implications for the delivery of housing, employment land and infrastructure. The draft should be substantially revised before it is finalised.

We also strongly recommend that Council undertake and publicly exhibit a thorough financial and economic impact assessment before adopting the Plan, given its potential to impose substantial additional costs on Council and ratepayers and constrain investment and growth across the Central Coast.

Management of the Swift Parrot has material impacts on development assessment. Under the Biodiversity Conservation Act 2016 (BC Act), the Swift Parrot is subject to the Biodiversity Assessment Method (BAM) and the serious and irreversible impacts (SAIL) test, meaning proposals that are assessed as causing a SAIL must be refused.

While the exhibited Plan correctly recognises the BAM important habitat map as the only statutory mapping layer, its operative provisions rely on non-statutory datasets, including Key Biodiversity Areas (KBA) identified in the National Recovery Plan and predictive habitat mapping, as though they create binding development constraints. It also departs from the National Recovery Plan (NRP or Recovery Plan) by treating moderate and high-value habitat as irreplaceable and effectively removing the offset pathway that both the Recovery Plan and the Biodiversity Offsets Scheme (BOS) intend. These provisions would increase uncertainty for development, increase disputes and litigation, discourage investment on the Central Coast and duplicate existing biodiversity assessment processes, without a commensurate demonstrated conservation benefit. The Plan should instead align with the BC Act, the BAM and the National Recovery Plan by applying reasonable avoidance requirements, treating non-statutory mapping as guidance rather than a regulatory constraint, and retaining the offset pathway established under legislation.

The draft would also benefit from stronger integration with existing strategic planning. Much of the mapped habitat has already been assessed through strategic rezoning or biodiversity certification, and the REDACTED is currently preparing the Central Coast Strategic Conservation Plan. The SMP should complement – rather than duplicate, pre-empt or extend – these existing frameworks. Similarly, Council's own habitat management and recovery commitments should be measurable, funded and time-bound, with responsibility for evaluating regional cumulative impacts resting with Council rather than individual proponents.

REDACTED recommends targeted amendments to the draft SMP to better balance protection of the Swift Parrot with the Central Coast's need to deliver housing, employment and infrastructure. Our recommendations are summarised below and explained in detail in this submission.

Related but outside the scope of this targeted submission, REDACTED underscores that the assessment of SAIL is a critical element to how the Swift Parrot and other species are managed. SAIL assessment is inherently subjective and a major source of uncertainty within the current system. REDACTED would welcome the opportunity to consult with Council on its approach to assessing SAIL in general, with the aim of developing a shared understanding and consistent application of the REDACTED SAIL guidelines on the Central Coast. We will follow up with Council on this separately.

Recommendations Summary

1

Keep the SMP within the BC Act and BAM framework, and apply the non-statutory Key Biodiversity Area and REDACTED et al. 2025 layers as considerations, not as mandatory avoidance triggers.

2

Remove the automatic "assumed presence" rule and adopt a tiered habitat approach via established statutory tools and pathways for appropriate evaluation.

3

Make avoidance reasonable and proportionate, by revising the requirement in Section 7.3 to retain habitat "in any condition", so that it instead focuses on verified higher value habitat.

4

Preserve the offset pathway that the National Recovery Plan and the BOS both include, by revising Section 7.4 so that moderate to high value habitat is not treated as categorically irreplaceable.

5

Align tree retention with the National Recovery Plan's cohort and continuity model, and express retention of large feed trees as a strong aim rather than an absolute prohibition.

6

Make buffers and edge controls performance based, reconcile them with bushfire Asset Protection Zone requirements, and provide a defined methodology for edge ratio analysis.

7

Recognise prior strategic planning and biodiversity certification, and align the SMP with the REDACTED's Central Coast Strategic Conservation Plan rather than duplicating it.

8

Place responsibility for cumulative impact accounting with Council instead of the individual proponent.

9

Give Council's own recovery actions the same measurable, funded and time bound discipline expected of proponents, and consolidate restoration funding into a strategic, Council-led program targeting public flood-prone land, estuarine foreshores and riparian link gaps.

10

Treat predictive mapping and the underlying records as an advisory tool that requires field validation, and publish the methodology and limitations.

11

Revise the provisions identified in this submission, conduct a financial and economic impact assessment and publicly re-exhibit the revised Plan and impact assessment prior to adoption.

Appropriate use of statutory vs non-statutory layers

REDACTED welcomes that Section 6 correctly identifies the Biodiversity Offsets Scheme (BOS) and its BAM important habitat map as the only layer with statutory authority. Likewise, Section 6 appropriately identifies the Key Biodiversity Area map and the REDACTED et al. 2025 model as matters that may be taken into consideration under section 7.13(6)(a) of the BC Act.

However, Section 7.3 then requires proponents to avoid and retain habitat by reference to the non-statutory layers (KBA map and REDACTED model), including habitat that sits outside the BAM important habitat map. The draft itself notes that around 72% of the modelled area lies outside the BAM important habitat map.

Applying non-statutory layers as mandatory avoidance triggers is an unjustified overreach that will lead to more disputes and litigation. REDACTED recommends aligning Section 7 with Section 6 and confirming the legal status of the multiple layers of inputs used to assess a development proposal in the context of its potential impact on the Swift Parrot.

REDACTED recommends revising the SMP to clearly outline the legitimate status of the following layers:

1.

Mandatory Statutory Obligations: BC Act, BAM, and statutory LEP controls.

2.

Non-Statutory Considerations: Council DCP guidelines, predictive models, KBA boundaries, and general recovery guidance. Recommendation 1 Keep the SMP within the BC Act and BAM framework, and apply the non-statutory Key Biodiversity Area and REDACTED et al. 2025 layers as considerations, not as mandatory avoidance triggers.

Assumed presence

The draft SMP goes beyond the BC Act and the BAM without justification. Under the BC Act, assumed presence is only applicable for proposals that a) trigger the Biodiversity Offsets Scheme and b) are located within the BAM important habitat map.

Section 7.1 defaults to a blanket assumption of species presence wherever listed feed trees occur, regardless of statutory thresholds, existing mapping or evidence. REDACTED categorically objects to this approach, which is likely to result in the refusal of many applications where no ecological evidence exists.

The listed feed trees are widespread, common canopy species frequently occurring across the LGA. This means that the Swift Parrot would be automatically assumed present on many proposed development sites, regardless of any verified site-specific ecological information. Since the Swift Parrot is a SAIL species, assumed presence could result in refusals for many of those development applications.

Instead of broadly applied assumed presence based on common tree species, we recommend the SMP should adopt the tiered habitat approach used in State Environmental Planning Policy (Biodiversity and Conservation) 2021, relying on established statutory tools and pathways for appropriate evaluation.

Tier

Attributes

Prescribed Assessment Response

Tier 1: Confirmed or High-Confidence Important Habitat

- Repeatedly documented foraging locations with verified spatial accuracy.
-

Verified, resource rich habitat associated with known historical usage.

• Areas demonstrated to support critical, high-yielding seasonal flowering resources. • Strong priority for impact avoidance. • Detailed, site specific ecological impact assessment. • Trigger for evaluating Serious and Irreversible Impacts (SAIL). • Formal consideration of Commonwealth EPBC Act 1999 referral obligations. • Comprehensive management and offsetting of unavoidable residual impacts.	
Tier 2: Statutory or Strongly Supported Potential Habitat	
• Verified BAM Important Area Mapping Habitat supported by multiple independent lines of ecological evidence • Assessment conducted strictly under the applicable statutory pathway (e.g., BAM / Test of Significance)Site-specific	
Tier	
Attributes	
Prescribed Assessment Response	
• Field-validated, high-suitability modelled habitat foraging resource assessment by an Accredited Assessor. • Application of reasonable avoidance and minimisation measures. • Formal mitigation and credit offsetting where required.	
Tier 3: General Potential Habitat	
• Common feed tree occurrence outside documented usage zones. • Isolated, degraded, or low-resource individual canopy trees. • Highly disturbed, fragmented, or modified urban vegetation • Vegetation outside statutory important areas and verified high-suitability zones • Proportionate, site-level ecological assessment. • Standard application of the 5-part Test of Significance or BAM threshold test. • No automatic presumption of species presence. • No general presumption against development impact.	
Recommendation 2 Remove the automatic “assumed presence” rule and adopt a tiered habitat approach via established statutory tools and pathways for appropriate evaluation.	
Make avoidance reasonable and proportionate	
Section 7.3 requires proponents to maximise retention of Swift Parrot habitat “in any condition.” Read with the requirement to avoid impacts to feed trees across the non-statutory layers, this approaches an absolute presumption against development across large portions of the Central Coast.	
Section 7.3 goes beyond the BC Act requirement, which is that reasonable measures be taken to avoid and minimise impacts before offsetting. The requirement should be recast around verified higher value habitat and reasonable avoidance. REDACTED recommends incorporating this wording:	

Proposals are to demonstrate reasonable and proportionate avoidance and minimisation of impacts on verified higher value Swift Parrot habitat.

Recommendation 3 Make avoidance reasonable and proportionate, by revising the requirement in Section 7.3 to retain habitat "in any condition", so that it instead focuses on verified higher value habitat.

Preserve the offset pathway

Section 7.4 states that moderate to high value habitat is irreplaceable and that mitigation should not be relied upon to replace any loss. This goes beyond the National Recovery Plan on which the draft relies. The Recovery Plan provides that where removal of critical habitat cannot be avoided or mitigated, an offset should be provided, and the BOS provides the mechanism to do exactly that. Removing the offset pathway would leave proponents with no lawful means of proceeding where avoidance is not reasonable, which is neither required by the Recovery Plan nor consistent with the avoid, minimise and offset hierarchy in the BC Act.

REDACTED recommends incorporating this new wording:

Where impacts on higher value Swift Parrot habitat cannot reasonably be avoided or minimised, residual impacts are to be offset in accordance with the Biodiversity Offsets Scheme, consistent with the National Recovery Plan.

Recommendation 4 Preserve the offset pathway that the National Recovery Plan and the BOS both provide, by revising Section 7.4 so that moderate to high value habitat is not treated as categorically irreplaceable.

Align tree retention with the National Recovery Plan approach

The National Recovery Plan states that Swift Parrots preferentially forage in large mature trees, and that trees of 60cm diameter at breast height and above warrant particular consideration. The Recovery Plan pairs the retention of large mature trees with a cohort younger age classes to secure continuity of food resources over time.

REDACTED is concerned that Section 7.3 makes retention of habitat trees an absolute requirement, including for isolated individual trees in backyards and road reserves. There is no alternative pathway where retention is not reasonable. Adopting the Recovery Plan's own cohort model is both more faithful to the science and more workable in a practical sense.

Recommendation 5 Align tree retention with the National Recovery Plan's cohort and continuity model, and express retention of large feed trees as a strong aim rather than an absolute prohibition.

Buffers and edge controls

The 10m buffer in Section 7.3 is expressed as a general minimum and is tied to Chapter 2.4.2.7 of the Central Coast Development Control Plan 2022. No analysis is provided to justify a blanket 10m buffer. Three refinements would improve workability. First, buffer widths should be able to respond to site conditions such as topography, lighting and traffic on a performance basis. Second, the buffer widths should be expressly reconciled with bushfire Asset Protection Zone (APZ) requirements, since a fixed habitat buffer and a statutory APZ can otherwise impose conflicting obligations. Third, the edge ratio analysis required by Section 7.3 should be supported by a defined and practical methodology, so that it can be applied consistently.

We recommend incorporating this wording:

Buffer widths and edge management are to be determined on a performance basis having regard to site conditions and to bushfire Asset Protection Zone requirements. Where a habitat buffer and a statutory Asset Protection Zone cannot both be satisfied, the statutory requirement prevails and habitat outcomes are to be managed through alternative measures. Council will publish a defined methodology for the edge ratio analysis required under this section.

Recommendation 6 Make buffers and edge controls performance based, reconcile them with bushfire Asset Protection Zone requirements, and provide a defined methodology for edge ratio analysis.

Recognition of strategic planning

Much of the mapped habitat occurs on established urban areas and infrastructure corridors where biodiversity values have already been assessed through strategic rezoning or biodiversity certification. Consistent with REDACTED's long held position, settled strategic land use outcomes should not be routinely reopened at the development application stage unless material new information emerges or the proposal departs from the strategic framework.

Just as importantly, the REDACTED is separately preparing a Central Coast Strategic Conservation Plan covering many of the development areas within the mapped habitat. The SMP should recognise and align with that state led process, not duplicate, pre-empt or override it.

Requiring proponents to satisfy this SMP over and above the BOS and the state strategic conservation plan would be the clearest possible example of accumulative regulation working against the region's growth objectives.

We recommend incorporating this wording:

Where biodiversity values on land have been assessed and settled through strategic rezoning or biodiversity certification, those outcomes are not to be reopened at the development application stage unless material new information arises. This

Plan is to be read consistently with, and does not duplicate, pre-empt or override the Central Coast Strategic Conservation Plan as adopted.

Recommendation 7 Recognise prior strategic planning and biodiversity certification, and align the SMP with the REDACTED's Central Coast Strategic Conservation Plan rather than duplicating it.

Cumulative impact

Section 7 as drafted requires proponents to assess their proposal's regional cumulative impact on the Swift Parrot. However, cumulative impact is a landscape scale question that no single applicant can answer. Council is better placed to hold this information centrally, and Recovery Action 6 already commits Council to maintaining a modelled habitat layer that could form its basis. Council should establish and maintain a publicly accessible cumulative habitat account to track cleared habitat, approved consents, retained patches, statutory offsets, mature tree loss and recruitment survival. The requirement on the applicant should shift to reporting their project's contribution against this single Council dataset.

We recommend incorporating this wording:

Council will establish and maintain a publicly accessible cumulative habitat account recording habitat cleared, retained, restored and offset across the local government area, against which proponents report their project's contribution.

Recommendation 8 Place responsibility for cumulative impact accounting with Council instead of the individual proponent. Council's role

A restoration effort is most effective when consolidated strategically on public land, as the National Recovery Plan itself recommends, rather than scattered across small plantings tied to individual development boundaries. Historical records show major foraging occurs in productive coastal and lake-fringe environments. Restoration funding should be consolidated into a strategic, Council-wide program targeting public lands.

We also note that where the Plan places detailed and enforceable obligations on proponents, Council's own recovery commitments in Section 8 rely on discretionary terms such as "explore" and "where funding is available." As outlined below, REDACTED recommends strengthening Council's obligations and commitments across its own land to realise a more effective outcome.

Proposed Council Action

Specific Performance Measure & Target

Data Audit

Complete a comprehensive duplicate and spatial accuracy audit of local Swift Parrot records within 12 months.

Mapping Validation

Formally publish predictive mapping methodologies, validation results, and operational limitations prior to statutory adoption.

Restoration Prioritisation

Audit Council owned flood prone, foreshore, and riparian land to map strategic restoration priorities by a specified date.

Active Habitat Establishment

Establish binding annual hectare targets and feed tree planting quotas across public land.

Planting Survival Monitoring

Mandate ecological survival and establishment audits at 1, 3, and 5 year intervals post-planting.

Development Tracking

Publish annual reports tracking cumulative habitat avoided, approved for clearing, actively restored, and offset across the LGA.

Cumulative Accounting

Maintain and publish an annual, publicly accessible Cumulative Habitat Account dataset.

Research & Data Transparency

Publish full survey methodologies, flowering condition covariates, local detection numbers, and statistical limitations for public datasets.

We recommend incorporating this wording:

Council's recovery actions under this Plan are expressed as funded and time bound commitments with public annual reporting, and restoration is prioritised strategically on productive Council-owned foreshore, flood prone and riparian land. Recommendation 9 Give Council's own recovery actions the same measurable, funded and time bound discipline expected of proponents, and consolidate restoration funding into a strategic, Council-led program targeting public flood-prone land, estuarine foreshores and riparian link gaps.

Reliable mapping

REDACTED welcomes that the draft notes its vegetation mapping requires ground truthing to verify habitat on site. The same discipline should apply to the underlying records and the model outputs, which should not operate as standalone development constraints. Members have identified apparent errors in some local records, including coordinate and description mismatches and cross platform duplicates. Publishing the methodology and known limitations of any maps and models before adoption would improve confidence.

We recommend incorporating this wording:

Predictive habitat mapping and the underlying species records are advisory screening tools that require validation by site based assessment. Council will publish the mapping methodology, validation results and known limitations, and will review the accuracy and currency of the underlying records, before this Plan is adopted.

Recommendation 10 Treat predictive mapping and the underlying records as an advisory tool that requires field validation, and publish the methodology and limitations.

Conduct financial impact assessment and re-exhibit the Plan

The SMP deserves additional consultation and consideration prior to adoption, given the applicable coverage area and its potential for significant impacts on urban planning, development activity and the cost of Council services that will ultimately be borne by ratepayers.

Central Coast Council is proposing an exceptional approach with broad spatial application across the LGA that goes beyond the NSW Biodiversity Assessment Method. The Plan therefore has the potential to both significantly affect private sector investment and development across the Central Coast, as well as create additional costs for Council in implementing, administering and maintaining the Plan.

For Council to make an informed decision about whether to adopt the Plan, its financial and economic impacts should be properly assessed and transparently considered.

We recommend quantifying, at a minimum, the projected costs and impacts associated with implementation of the Plan, including:

- additional Council resourcing and staffing costs
 - additional compliance costs to Council's own Assets and Maintenance functions
- REDACTED | Draft Swift Parrot Species Management Plan 12
- the costs of periodic review and maintenance of the Plan, including the minimum five-year review cycle and any amendments required following changes to the BC Act or BAM
 - costs associated with cumulative impact mapping and its ongoing maintenance
 - additional assessment and approval timeframes, including associated opportunity costs
 - potential legal and court costs arising from additional development assessment appeals

economic impacts arising from reduced private sector investment and development activity, including implications for regional growth, housing supply and employment

REDACTED requests that Council revise the draft SMP in line with this submission, conduct a financial and economic impact assessment and place the revised Plan and impact assessment on public exhibition prior to adoption.

We would welcome the opportunity to work with Council on the revised Plan and on its alignment with the Central Coast Strategic Conservation Plan and the current State reforms to the Biodiversity Conservation Regulation.

Recommendation 11 Revise the provisions identified in this submission, conduct a financial and economic impact assessment and publicly re-exhibit the revised Plan and impact assessment prior to adoption.

Conclusion

Thank you for the opportunity to provide feedback on the draft Swift Parrot Species Management Plan.

We respectfully request that Council defer adoption of the SMP pending revisions, financial and economic impact assessment, and re-exhibition. We are confident that a Plan revised in line with our recommendations can protect the species while supporting the housing, jobs and investment the Central Coast needs. For further discussion or follow up, please contact REDACTED's REDACTED on REDACTED.

Kind regards,

REDACTED

re draft Swift Parrot Species Management Plan

Please accept my comments below which I submit in support of a further strengthened Species management plan for the Swift parrot so that it may achieve intended objectives to protect feeding trees from being destroyed through ill-considered development, and initiate useful and urgent actions by council and community to maintain and create current & future useful habitat for the species.

1. Careless inclusion of unlabelled images.

I note that on page 16 the photograph, unlabelled, is of two musk lorikeets, presumably this is an unintended mistake. Misidentification of species is not conducive to a robust Species Management Plan, adversely affecting survey counts and population measures. Musk lorikeets do share habitat with Swift parrots, and historically at my residential location in Umina along a riparian corridor I used to observe Swift Parrots and Musk Lorikeets in my trees amongst other species, but sadly now the Swift Parrots are absent, although some musk lorikeets still are sighted. Misidentifying more common birds as swift parrots may hide real declines of them, & with broken data, funds and actions may be misguided due to this false sense of security of presence.

These images could be removed, or correctly labelled, or utilised to show how challenges arise in survey and observation data. But as they are, the image is careless and useless.

2. With respect to the fact that this is a migratory species, could trees have further distinct protection when birds are actually present eg pausing development works adjacent to a confirmed feeding site for a matter of weeks.

3. remove the loopholes which are allowing significant backyard tree removal on private land...and increase compliance on this issue to deter insidious tree removal which happens with intentions for development applications to proceed further down the timeline. This is apparent in Umina Beach and a great contributor to the loss of canopy trees including important Swift parrot feed trees on the peninsula.

4. I don't believe "offsetting" can meaningfully contribute to the urgent action required to protect the swift parrot feeding trees. Habitat needs meaningful protection and urgently. Stop the rampant clearing of significant feed areas and protective habitat for the endangered and vulnerable species. Ecologists know this already and yet Council and developers push development boundaries unsustainably opposing the objectives of species management plans.

5. better mapping using best data this draft plan seems to use inappropriate survey timings and outdated ideas on observations. Citizen science and mapping tools allow far greater and more useful observations and data to be referred to in line with protecting what the species requires to survive.

The plan is urgent !! The action is urgent!! but the mature feeding trees and habitat corridors upon removal Cannot be urgently replaced.

Alternatively, suitable feed trees should default to "swift parrot presence- assumption" and be protected to the higher standard.

6. I request the establishment of a significant feed tree register alongside a habitat connectivity plan to help this species

7. How can this draft plan include timely targets so that recovery actions and performance can be independently and effectively audited with Council held to account.

8. No recent sightings information does not excuse council from protecting suitable species habitats...this is particularly relevant for the migratory patterns of the swift parrot.

9. the timing of this plan to review in 5 years is totally inadequate given the speed at which development is destroying crucial survival habitat and in no way represents adaptive and mitigating action relevant to climate change responsiveness and responsibilities. The plan needs real targets, measurable and funding which can be measured and followed up with compliance actions.

10. Swift parrot Species protection needs more than this plan currently has drafted for...and the improvements needed are readily available and represented by other Council and ecology plans which are being implemented and referred to relevant to the Swift Parrots migratory path.

Thank you for accepting my comments towards this issue which greatly concerns me and causes me considerable distress to think that Council would not initiate the highest standards possible to support the survival of this species which is under its watch and the stewardship of residents.

REDACTED

Submission on the Central Coast Council Draft Swift Parrot Species Management Plan

REDACTED

9/08/2026

The SMP represents a significant and welcome contribution to understanding the ecology and habitat requirements of one of Australia's most threatened birds. Its review of the available science, habitat mapping and local survey data provides a strong foundation for future conservation.

The principal concern raised in this submission is not the ecological evidence itself, but the way that evidence is translated into planning and management. While the SMP clearly identifies the importance of protecting and restoring foraging habitat, many of its implementation measures remain discretionary, lack clear statutory effect, or provide insufficient certainty that the Plan's conservation objectives will be achieved in practice.

These shortcomings are particularly significant given the National Recovery Plan for the Swift Parrot (2024), which identifies maintaining habitat extent, quality and connectivity, and reducing human-induced threats, as priorities essential to preventing further decline of the species.

The recommendations below are intended to strengthen the implementation framework. They are supported by examples from other Australian jurisdictions that demonstrate stronger approaches are both practical and achievable.

Key Themes

The best available habitat mapping should play a stronger statutory role

The SMP relies on three principal habitat datasets. However, only the Biodiversity

Assessment Method (BAM) Important Habitat layer currently carries statutory weight under the Biodiversity Conservation Act 2016.

Council's own analysis demonstrates that this is a substantial limitation. The REDACTED et al. (2025) habitat model identifies approximately 8,000 hectares of potential habitat, with around 72 per cent occurring outside the mapped BAM layer. Likewise, the National Recovery Plan identifies Key Biodiversity Areas (KBAs) that represent important habitat for the species but presently function only as information that "may be taken into consideration" during assessment. For a species recognised as being at risk of Serious and Irreversible Impact, this creates a significant disconnect between the best available ecological evidence and the legal framework used to assess development.

The SMP should therefore recommend that development affecting mapped KBAs and the REDACTED et al. high-suitability habitat layer trigger mandatory ecological assessment through corresponding amendments to Council's LEP and DCP. Other councils have already embedded biodiversity mapping directly within statutory planning controls, demonstrating that this approach is both practical and well established.

The ecological evidence is stronger than the assessment framework

One of the SMP's most important findings is that swift parrots occur unpredictably, even within high-quality habitat. Drawing on five years of local surveys and expert review, the Plan concludes that planning decisions should not rely solely on recent sighting records because absence during a survey does not indicate absence of habitat value. Despite this conclusion, the assessment pathway does not consistently apply that precautionary principle.

Outside Biodiversity Offset Scheme applications, targeted surveys are merely encouraged rather than required. Where undertaken, the recommended survey effort is limited to a single twenty-minute observation period over a two-hectare area during flowering. Given the species' irregular and highly mobile foraging behaviour, this methodology has a substantial

risk of producing false negative results.

The assessment framework should therefore reflect the ecological evidence presented earlier in the SMP. Wherever suitable feed trees occur, either targeted surveys or a precautionary assumption of potential habitat use should form part of the assessment process regardless of whether the Biodiversity Offset Scheme applies.

Retention thresholds do not adequately protect future habitat

The current emphasis on retaining feed trees exceeding 60 centimetres diameter at breast height is appropriate but incomplete.

The SMP itself acknowledges that replacement feed trees require more than twenty years to develop equivalent ecological value. Protecting only the oldest trees therefore fails to secure the next generation of habitat upon which the species will ultimately depend. A supplementary retention threshold should therefore apply to younger feed trees of recognised habitat species, ensuring that future habitat is protected as existing mature trees naturally decline.

Equally important is the lack of any clearly identified statutory mechanism to implement the requirement that significant feed trees be retained on private land. Without an accompanying permit trigger, tree preservation control or planning provision, this important objective risks remaining largely aspirational. The final SMP should clearly identify the planning instrument through which these protections will be administered and enforced.

Monitoring arrangements should reflect the urgency of the conservation challenge

The evidence presented within the SMP highlights an ongoing and accelerating decline in available habitat. Between 2000 and 2019 alone, approximately 597 hectares of mapped habitat were cleared across the Central Coast, while recent modelling suggests the species may approach extinction within the coming decades if current trends continue. Against this background, a fixed five-year review cycle is unlikely to provide a sufficiently responsive management framework.

The Plan should incorporate adaptive review triggers linked to measurable indicators such as cumulative habitat loss or the decline of confirmed high-value sites. Such triggers would enable Council to respond quickly where conservation outcomes are not being achieved rather than waiting for scheduled reviews.

Recovery actions should include measurable outcomes

The Recovery Actions currently lack measurable performance indicators. Although responsibilities are assigned to Council staff, the actions are generally unsupported by defined budgets, implementation timeframes or quantitative targets.

Consequently, it will be difficult to determine whether the Plan has succeeded or failed in achieving its objectives.

The final SMP should establish measurable outcomes for each action, including appropriate performance indicators such as hectares of habitat protected or restored, numbers of significant feed trees retained, conservation agreements established, or other quantifiable measures that can be independently monitored and publicly reported.

Experience from other Swift Parrot recovery programs demonstrates that transparent reporting against measurable targets is both achievable and essential for adaptive management.

A migratory species requires consistently high standards across its entire range

The Swift Parrot's annual migration means its survival depends on the cumulative protection of habitat across multiple jurisdictions. Birds breeding successfully in Tasmania rely on

suitable winter foraging habitat throughout mainland Australia, including the Central Coast. Habitat loss or weak planning controls in any one part of this migration network reduce the effectiveness of conservation efforts elsewhere.

This reality strengthens, rather than weakens, the case for robust local action. Because the population functions as a single interconnected system, each jurisdiction has a responsibility to apply the highest practicable standard of habitat protection rather than assuming conservation outcomes depend primarily on decisions made elsewhere.

The SMP should therefore acknowledge that local measures alone cannot secure recovery of the species and commit Council to advocating for equivalent protection across the Swift Parrot's wider range through its engagement with State and Commonwealth agencies and neighbouring jurisdictions.

Planning precedents demonstrate stronger protection is achievable

Several Australian planning frameworks already provide stronger protection for important habitat than that currently proposed in the SMP.

Victorian planning controls, particularly within the species' principal winter range, provide useful examples. These include assessment pathways that are triggered by the removal of a single significant tree regardless of the total clearing area, statutory environmental overlays protecting mapped habitat, construction buffers around protected trees, seasonal restrictions on activities while birds are present, and publicly maintained registers of significant habitat trees linked to broader habitat connectivity planning.

These examples demonstrate that stronger statutory protection of significant feed trees and habitat corridors is both practical and precedented. The SMP should adopt comparable approaches wherever they can reasonably be transferred to the Central Coast planning framework.

Further structural and implementation gaps

Two broader implementation issues warrant attention beyond the clause-specific recommendations contained later in this submission.

1. The SMP does not adequately explain its relationship with the NSW Government's draft Central Coast Strategic Conservation Plan. That Plan was publicly exhibited by the Department of Planning between 30 September and 14 November 2025 and remains under consideration. If approved in a form substantially similar to that exhibited, it proposes strategic biodiversity certification across identified urban growth areas including Greater Warnervale, Greater Lake Munmorah and Somersby.

Strategic certification has the potential to fundamentally alter how biodiversity is assessed for development within certified land by providing approvals at a landscape scale rather than through individual development applications. This has direct implications for Section 7 of the SMP, including its provisions relating to Biodiversity

Development Assessment Reports, serious and irreversible impacts, species credits, habitat assessment, and the requirement to demonstrate genuine avoidance and minimisation.

While strategic certification would not necessarily remove all local planning controls, the SMP provides no explanation of which of its habitat mapping, avoidance, tree-retention or mitigation requirements would continue to apply within certified precincts, nor how any inconsistency between the two frameworks would be resolved.

This omission is particularly significant where certified land contains BAM Important Habitat, Key Biodiversity Areas, habitat identified by the Crates et al. model as having greater than 70 per cent suitability, large feed trees, or other known or potential Swift Parrot habitat. Council should therefore seek formal spatial and policy reconciliation with the REDACTED before finalising the SMP. High-value and irreplaceable Swift Parrot habitat should be excluded from certified urban capable land, and the final SMP should clearly explain how its habitat mapping, avoidance requirements, tree-retention provisions and cumulative impact assessment will operate within any future biodiversity certification framework.

If this reconciliation cannot be completed within a reasonable timeframe, adoption of the SMP should not be delayed.

Instead, the Plan should identify this as an unresolved implementation risk and commit Council to continuing discussions with the Department to ensure that strategic certification does not undermine the protections established by the SMP.

2. The SMP is framed predominantly around planning proposals, development applications and Council works. However, important Swift Parrot habitat may also be affected through statutory pathways that do not involve an ordinary merits-assessed development application. These include complying development under State environmental planning codes and vegetation clearing undertaken under the 10/50 provisions of the Rural Fires Act 1997.

Although complying development remains subject to certain certification requirements, it generally provides far less opportunity to assess cumulative habitat loss, alternative site layouts, the ecological importance of individual feed trees or landscape connectivity. As complying development pathways continue to expand, it becomes increasingly important that Council's habitat mapping and tree-retention requirements are reflected within those approval processes wherever possible. The 10/50 vegetation-clearing framework presents a separate challenge. Lawful clearing undertaken under the Code may occur without development consent, potentially affecting significant habitat on private land. The SMP should therefore identify where 10/50 entitlement areas overlap important Swift Parrot habitat, establish education and voluntary conservation initiatives for affected landowners, and advocate for amendments to the 10/50 Code in consultation with the NSW Rural Fire Service where necessary.

The SMP records that up to 400 Swift Parrots have been observed feeding on Blackbutts within the Bateau Bay area, including large trees growing on residential land. These observations demonstrate that individual backyard and urban trees can provide habitat of regional, and at times potentially population-level, significance. Yet these are precisely the trees for which current statutory protection remains least certain.

Offsetting cannot replace the loss of irreplaceable habitat

The SMP appropriately recognises that mitigation should not be relied upon to compensate for the loss of moderate to high-quality Swift Parrot habitat. However, it stops short of recognising that biodiversity offsets are an inadequate substitute for the loss of irreplaceable foraging habitat. Extensive research has identified inherent limitations in offsetting, including long time delays before replacement habitat becomes functional, uncertainty that ecological restoration will succeed, and the practical difficulty of recreating mature habitat with equivalent ecological values. These concerns are reinforced by the NSW Audit Office's findings regarding the operation of the Biodiversity Offsets Scheme and by research documenting the long-standing failure of conservation policy to keep pace with the scientific evidence for the Swift Parrot.

These limitations are especially significant for this species. The SMP acknowledges that replacement feed trees require decades to reach ecological maturity, while recent modelling suggests the species itself faces a critically narrow window for recovery. Habitat that may become suitable several decades into the future cannot realistically compensate for the loss of mature foraging resources that are required today.

For confirmed high-value foraging habitat, avoidance should therefore remain the primary management response. Where offsets are considered for lower-value habitat, they should only proceed under a transparent, independently audited methodology capable of demonstrating genuine ecological equivalence within a meaningful timeframe.

Priority Recommendations

The ecological evidence presented throughout the Draft Species Management Plan is compelling. The principal opportunity for improvement lies not in the science itself, but in ensuring that the planning framework gives practical effect to that evidence. To strengthen the Plan before adoption, Council should prioritise the following amendments:

Strengthen statutory protection of important habitat

The strongest available habitat mapping should play a defined role in statutory planning decisions.

Council should:

- Give the Crates et al. (2025) habitat model and mapped Key Biodiversity Areas a formal assessment role through corresponding LEP and DCP amendments.
- Introduce statutory biodiversity overlays or equivalent planning controls over important Swift Parrot habitat.
- Create an independent assessment trigger for the removal of significant feed trees, regardless of whether they occur within the BAM mapping.

Comparable approaches have already been adopted by councils including Ku-ring-gai and through biodiversity planning reforms underway at Northern Beaches Council, while Victorian planning schemes provide further examples of statutory habitat overlays and large-tree assessment triggers.

Align the assessment framework with the ecological evidence

The SMP correctly recognises that Swift Parrots are highly mobile and occur unpredictably, even within high-quality habitat. The assessment framework should therefore adopt a precautionary approach consistent with these findings.

Council should:

- Require targeted surveys, or alternatively apply a precautionary assumption of habitat use, wherever suitable feed trees occur.
- Review the scientific basis of the proposed 10-metre Urban Interface Area buffer and adopt species-specific edge-effect distances where supported by evidence.
- Introduce seasonal protection measures that temporarily restrict disturbance where birds are confirmed to be actively foraging.

These changes would ensure that the assessment process better reflects the ecological conclusions reached elsewhere in the SMP.

Improve protection of individual feed trees

Large mature feed trees are irreplaceable in the short term, but younger trees are equally important in securing future habitat.

Council should:

- Introduce a supplementary retention threshold for younger feed tree species below the current 60 cm DBH criterion.
- Clearly identify the statutory mechanism that will protect significant feed trees on both public and private land.
- Require construction and excavation setbacks around protected trees, not simply protection from removal.
- Establish a publicly accessible Significant Feed Tree Register supported by a Habitat Connectivity Plan.

Together these measures would create a more comprehensive and enforceable framework for protecting habitat across the urban landscape.

Address important implementation gaps

Several important pathways capable of affecting Swift Parrot habitat currently sit outside the SMP's primary assessment framework.

Council should:

- Clearly define how the SMP will operate alongside any future biodiversity certification under the Draft Central Coast Strategic Conservation Plan.
- Ensure that strategic biodiversity certification cannot diminish the habitat mapping, avoidance or tree-retention requirements established by the SMP.

• Extend habitat protection principles, wherever legally available, into complying development pathways and other approval mechanisms.

• Identify the interaction between important habitat and vegetation clearing permitted under the 10/50 provisions, while advocating for improvements to the relevant statutory framework where necessary.

Addressing these issues will substantially improve the practical implementation of the Plan.

Strengthen monitoring, implementation and accountability

Long-term success will depend upon effective implementation rather than policy alone.

Council should:

- Attach measurable performance indicators, implementation timeframes and reporting requirements to every Recovery Action.
- Introduce adaptive review triggers that respond to cumulative habitat loss rather than relying solely on fixed review periods.
- Consider establishing an LGA-wide cumulative habitat-loss threshold to ensure that incremental approvals do not collectively undermine the Plan's objectives.
- Commit appropriate compliance resources and investigate incentives that encourage private landholders to retain significant feed trees.

These measures will allow the effectiveness of the SMP to be objectively monitored and continuously improved.

Give genuine primacy to avoidance

For a critically endangered migratory species dependent upon mature, irreplaceable habitat, avoidance should remain the primary conservation response.

Council should therefore:

- Exclude biodiversity offsets for confirmed high-value Swift Parrot foraging habitat.
- Require any offsets proposed elsewhere to satisfy a transparent, independently audited methodology demonstrating genuine ecological equivalence within a meaningful timeframe.

This approach is supported by restoration ecology research, findings of the NSW Audit Office regarding the Biodiversity Offsets Scheme, and published research documenting the longstanding mismatch between scientific knowledge and conservation outcomes for the Swift Parrot.

REDACTED

Submission on the Draft Swift Parrot Species Management Plan

Central Coast Council – Public exhibition closing 10 August 2026

1. Introduction

This submission responds to the Draft Swift Parrot Species Management Plan (“the SMP”) on public exhibition. The SMP is a welcome and detailed piece of work, and its ecological analysis (Sections 4–6) is thorough. However, in several respects the assessment and governance framework set out in Sections 7–9 falls short of what is needed to deliver the SMP’s own stated aims and the objectives of the National Recovery Plan for the Swift Parrot (DCCEEW 2024) – in particular Objective 1 (maintain or improve the extent, condition and connectivity of habitat) and Objective 2 (demonstrably reduce anthropogenic threats).

The comments below are grouped by theme, followed by a clause-by-clause table of specific recommended amendments, each linked to a precedent from another New South Wales (NSW) council’s planning framework or a comparable species program, to demonstrate that stronger provisions are achievable and already in use elsewhere.

2. Key themes

2.1 Non-statutory status of the best available habitat mapping

Of the three habitat maps discussed in Section 6, only the Biodiversity Assessment Method (BAM) important habitat map has legal force under the Biodiversity Conservation Act 2016 (BC Act) – and it is based on sightings data to 2020, not

publicly accessible, and confined to areas with a specific density/frequency of historical records. The Crates et al. (2025) species distribution model, which the SMP itself states identifies 8,058 ha of potential habitat (of which 72% falls outside the BAM boundary), and the National Recovery Plan's mapped Key Biodiversity Areas (KBAs), are both reduced to material that "can be taken into consideration" under s7.13(6)(a) of the BC Act. For a species assessed as being at risk of a Serious and Irreversible Impact, this is a significant gap between the evidence base Council has assembled and the statutory weight that evidence is given in decision-making.

2.2 Internal inconsistency between the ecological findings and the assessment pathway

Section 5.2 draws directly on Council's own five years of survey data and an expert panel workshop to conclude that swift parrot occurrence is rare and sporadic even in important habitat, and that planning decisions should not rely solely on recent sighting records. Section 7.1 does not carry this finding through: outside the Biodiversity Offset Scheme (BOS) pathway, a targeted survey is only "encouraged," and where undertaken is limited to a single 20-minute count over a 2 ha plot during peak flowering – a design that the SMP's own conclusions suggest will often fail to detect the species even where it is a regular but infrequent user of a site.

2.3 Retention and protection thresholds are inadequate

The ≥ 60 cm diameter at breast height (DBH) threshold applied to "important to retain" feed trees, including isolated trees on private land, does not distinguish a supplementary protection tier for younger trees that will become the next generation of feed trees – a concern given the SMP's own acknowledgment that replacement trees take in excess of 20 years to reach functional maturity. Separately, the obligation in Section 7.3 to "protect and retain" large feed trees on private land is not linked to any specific enforcement mechanism (permit trigger, tree preservation order, or Local Environmental Plan (LEP) / Development Control Plan (DCP) clause), which risks the provision operating as aspiration rather than an assessable control.

2.4 Monitoring approach does not reflect the urgency in the SMP's own data

The SMP reports 597 ha of mapped habitat cleared on the Central Coast between 2000 and 2019, and cites Crates and Heinsohn (2025) on the species' risk of functional extinction within roughly 20 years. Against that backdrop, a fixed five-yearly review cycle with no interim trigger appears misaligned with the pace of both habitat loss and population decline that the SMP documents.

2

2.5 Recovery actions lack measurable targets

Section 8's Recovery Actions table assigns responsibility to Council roles but does not attach a budget, a numeric target, or a timeframe to any action – most notably Action 4 ("no loss of high value important habitat"), which as drafted cannot be objectively audited against performance data.

2.6 A migratory species is only as protected as its weakest link

It is worth stating plainly why comparisons with other jurisdictions matter here, beyond simply borrowing good ideas. The swift parrot does not spend its life within the Central Coast Local Government Area (LGA), or even within NSW: it breeds in Tasmania over summer, then disperses across a broad mainland winter range that includes the NSW coast and western slopes, the Australian Capital Territory (ACT), southern Queensland, and – most heavily – the box-ironbark forests of central Victoria. The National Recovery Plan's own population modelling treats this entire range as a single interdependent system: a bird that survives a well-managed winter on the Central Coast can still be lost to habitat loss in Bendigo the following year, or to nest predation in Tasmania the year after that.

This interdependence cuts only one way for present purposes: it is not a reason for any single jurisdiction, including Central Coast, to treat its own contribution as marginal or to settle for a lesser standard on the basis that outcomes ultimately depend on decisions made elsewhere. Because the population functions as one range-wide system, a weak or absent

provision in any single link – whether in Tasmania, in a Victorian box-ironbark forest, or on the Central Coast – has the potential to undermine gains made everywhere else. The species cannot be recovered by strong protection in some parts of its range and weak protection in others; every jurisdiction the swift parrot passes through needs to hold the line, and that makes it more important, not less, that Central Coast's own provisions are as strong as they can be – not calibrated down to match whatever standard happens to apply elsewhere.

The practical implication for this submission is twofold. First, where other jurisdictions – including the Victorian examples set out below – have already implemented stronger, statutory, or more precisely targeted protections, there is no principled basis for Central Coast to adopt anything less. A plan that reads as comparatively strong on paper, but is in substance weaker than measures already operating in another part of the same migratory system, is not adequately protecting the species; it is simply relocating the point in the bird's annual cycle at which it remains most exposed, and Council should not allow that outcome by default. Second, Central Coast Council should not treat its own performance as sufficient in isolation. The SMP should acknowledge explicitly that its measures, however strong, are necessary but not sufficient on their own, and should commit Council to using its regional and state government relationships – including through the Hunter and Central Coast Regional Planning Panel process, and its own advocacy to the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) and the Victorian and Tasmanian governments – to press for equivalent rigour across the rest of the species' range.

2.7 Comparators from Victoria's winter range

The box-ironbark forests of central Victoria (Bendigo, Maldon, Rushworth, Maryborough-Dunolly) are the swift parrot's other major mainland winter stronghold, and Victorian planning and forest management frameworks include several mechanisms that go further than this SMP in specific, transferable ways:

-

Victoria's native vegetation removal framework (Clause 52.17, assessed via the Native Vegetation Information Management (NVIM) tool) sets the permit pathway according to three independent factors – area cleared, whether any large trees are involved, and landscape location – so a single qualifying large tree escalates the assessment pathway regardless of the total area cleared. This closes the gap the SMP currently leaves for isolated large feed trees outside the mapped BAM buffer.

-

Victorian Environmental Significance Overlays (ESO) and Vegetation Protection Overlays (VPO) embed habitat protection directly and bindingly into the planning scheme (e.g. the City of Greater Bendigo's ESO1 over box-ironbark swift parrot habitat), reinforcing the case – already made via the Ku-ring-gai and Northern Beaches examples – for giving the Crates et al. (2025) and KBA layers real statutory weight in Central Coast's own LEP/DCP.

-

Victorian Significant Landscape Overlays define a protected tree by trunk circumference and additionally require a permit for building works within four metres of it – protecting the root zone and canopy, not just the trunk.

-

Special Management Zones in Victorian Forest Management Plans protect all larger trees at identified swift parrot sites and exclude disturbing activity specifically while the birds are foraging there – a seasonal, presence-based protection layered on top of a fixed spatial buffer.

-

The City of Greater Bendigo's Biodiversity Strategy pairs a Significant Tree Register with a Habitat Connectivity Plan, giving individually important trees a public, administrable listing alongside a landscape-scale connectivity target.

3

2.8 Further structural and implementation gaps

Two additional gaps are significant enough to warrant their own discussion, beyond the clause-specific issues already raised above.

First, the SMP does not adequately explain its relationship with the NSW Government's controversial and highly contested draft Central Coast Strategic Conservation Plan. The draft Strategic Conservation Plan was publicly exhibited by the Department of Planning, Housing and Infrastructure from 30 September to 14 November 2025 and remains under consideration. It has not been approved and its proposed planning controls are not yet in force. The exhibited framework proposes upfront State and Commonwealth biodiversity approvals for development on certified urban capable land within Greater Warrervale, Greater Lake Munmorah and Somersby.

If the Strategic Conservation Plan is approved in a form substantially similar to that exhibited, project-specific biodiversity approval requirements may be removed or materially altered for development on certified land. This has direct implications for section 7 of the SMP, particularly its requirements concerning Biodiversity Development Assessment Reports, serious and irreversible impact assessment, species-credit obligations, site-specific habitat evaluation and demonstration of genuine avoidance and minimisation.

Certification would not necessarily displace all local planning, tree-retention or mitigation controls. However, the SMP presently provides no explanation of which of its provisions would continue to apply within certified land, how Council would assess habitat that has already received strategic biodiversity approval, or how inconsistencies between the two frameworks would be resolved. This omission is particularly significant where certified land contains BAM important habitat, Key Biodiversity Areas, habitat modelled by Crates et al. as having greater than 70 per cent suitability, large feed trees or other known and potential Swift Parrot habitat.

While council is assessing the public consultation of the SMP, Council should seek a formal spatial and policy reconciliation with the Department of Planning regarding the relationship between the SMP and the draft Central Coast Strategic Conservation Plan. High-value and irreplaceable Swift Parrot habitat should be excluded from certified urban capable land, and the final SMP should expressly state how its avoidance, mapping, tree-retention, indirect-impact and cumulative-impact requirements will operate under any final strategic biodiversity-certification framework.

If this reconciliation is not completed within a reasonable timeframe, adoption of the SMP should not be delayed. Instead, the final Plan should identify the issue as an unresolved implementation risk and include a specific action requiring Council to continue liaising with the Department of Planning to ensure that high-value and irreplaceable Swift Parrot habitat is excluded from certified urban capable land and that the final Strategic Conservation Plan does not undermine the protections established by the SMP.

Second, the SMP is framed predominantly around planning proposals, development applications and Council activities, but important Swift Parrot habitat may also be affected through statutory pathways that do not involve an ordinary merits-assessed development application. These include complying development under State environmental planning codes and vegetation clearing undertaken under the 10/50 provisions of the Rural Fires Act 1997.

Complying development requires a complying development certificate and may remain subject to separate tree-removal or vegetation approvals. Nevertheless, it does not ordinarily provide the same opportunity for a site-specific merit assessment of cumulative habitat loss, alternative development layouts, the ecological function of individual feed trees, seasonal resource availability or landscape connectivity. The progressive expansion of complying-development pathways therefore

increases the importance of ensuring that Council's Swift Parrot mapping and habitat-retention requirements are incorporated into certifier assessment, applicable vegetation controls and any future amendments to State codes.

The 10/50 vegetation-clearing framework presents a different and more direct gap. Clearing lawfully undertaken within a mapped entitlement area and in accordance with the statutory Code may occur without development consent. The SMP should therefore identify the intersection between 10/50 entitlement areas and important Swift Parrot habitat, establish targeted education and voluntary conservation measures for affected landowners, and require Council to seek appropriate amendments to the 10/50 Code in consultation with the NSW Rural Fire Service.

This issue is not theoretical. The SMP records that up to 400 Swift Parrots were observed feeding on Blackbutt in the Bateau Bay area and that large old trees in residential backyards were used by the species. These records demonstrate that individual trees on private urban land in our opinion perform a habitat function of regional and, in some seasons, potentially population-level significance. Yet these are precisely the trees for which the SMP currently provides the least certain protection.

4

2.9 Offsetting is not a credible substitute for avoidance for this species

Section 7.4 already states that mitigation measures "are not to be relied upon to replace loss of moderate-high quality swift parrot habitat," which is a sound starting position. However, the SMP does not go far enough: offsetting remains available as a residual pathway for approved impacts, with no published methodology setting out what would count as an adequate offset, and no engagement with the substantial body of evidence – general, NSW-specific and species-specific – indicating that offsetting has a poor track record of actually delivering the biodiversity outcomes it is supposed to secure. That evidence is set out below, because it goes directly to whether Section 7.4 can be relied upon to protect swift parrot habitat in practice, rather than only in principle.

At a general level, the most widely cited assessment of offset-based restoration, Maron et al. (2012), reviewed the restoration ecology literature underpinning biodiversity offset policy and found that only around one in five restoration projects achieved full success in recovering the biodiversity values they were meant to replace. The authors identified three structural limitations common to offsetting schemes generally: the time lag between loss and replacement, uncertainty over whether restoration will succeed at all, and the difficulty of measuring whether a replacement site is genuinely equivalent to what was lost. Their conclusion was that the circumstances in which restoration can reliably deliver a genuine "no net loss" outcome are narrow – not the default case offset policy tends to assume.

At the NSW level, this is not a hypothetical concern. The NSW Audit Office's 2022 performance audit of the state's own Biodiversity Offsets Scheme found that the scheme could not match roughly 90% of credit demand to available supply, identified a likely substantial undersupply of credits for a number of endangered species and threatened ecological communities, and could not demonstrate that the biodiversity gains being generated were sufficient to offset the biodiversity losses the scheme was approving. The audit also found that developers could pay into the Biodiversity Conservation Fund without any assurance that matching credits actually existed, allowing development impacts to proceed ahead of any confirmed offset. This is the same statutory scheme Section 7.2 of the SMP relies upon wherever the Biodiversity Offset Scheme (BOS) pathway applies.

For the swift parrot specifically, two further points compound these general and NSW-specific findings. First, this submission has already noted (Section 2.3) that replacement feed trees take in excess of 20 years to reach functional maturity – a timeframe that sits uncomfortably against the species' own projected trajectory toward functional extinction within a similar timeframe (Crates and Heinsohn 2025). An offset premised on habitat that will not perform its ecological function until after the window for recovering the species may have closed is not a meaningful offset in any practical sense. Second, Webb, Stojanovic and Heinsohn (2019) document a longer-standing pattern specific to this species: despite the swift parrot being among the most intensively studied Australian threatened species, conservation policy and management have repeatedly failed to keep pace with the scientific evidence generated about the threats it faces. That history provides little confidence

that an offset-based approach to foraging habitat loss on the Central Coast will be implemented, monitored and enforced any more effectively than the equivalent policy settings have been elsewhere in this species' range.

Taken together, this evidence supports strengthening Section 7.4 well beyond its current wording: offsetting should be excluded outright for confirmed high-value foraging habitat, with a defined, audited methodology required as a minimum safeguard for any offset proposed elsewhere. The corresponding recommendation is set out in the table below.

3. Recommended amendments and precedents

The table below sets out specific, clause-referenced recommendations, each linked to a comparable provision already operating in another NSW council area or state-funded program, to support the case that stronger measures are both precedented and practicable.

■ High priority – materially affects the SMP's ability to prevent habitat loss

■ Medium priority – strengthens implementation, monitoring or enforceability

Clause / Section Issue Recommendation Precedent / supporting reference S1, para 1 (Legislative context)

The Act is incorrectly cited as the "Environment and Planning Act 1979". The correct title is the Environmental Planning and Assessment Act 1979 (EP&A Act).

Correct the Act's title throughout the document.

N/A – drafting accuracy only.

5

Clause / Section Issue Recommendation Precedent / supporting reference S6, Maps 1–3; S7.2

Only the BAM important habitat map has legal force under the BC Act. The KBA map and the Crates et al. (2025) model – which the SMP itself states covers 5,764 ha (72%) of potential habitat outside the BAM boundary – are merely "able to be taken into consideration." This leaves the majority of modelled habitat without a binding assessment trigger.

Amend the SMP (and progress a corresponding LEP/DCP clause) so that development within the Crates et al. (2025) >70% suitability layer and mapped KBAs triggers a mandatory targeted assessment, rather than remaining discretionary.

Ku-ring-gai LEP 2015 embeds its "Greenweb" biodiversity mapping directly into a statutory clause: consent must not be granted on mapped "Areas of Biodiversity Significance" unless the consent authority is satisfied adverse impacts are avoided/minimised. Northern Beaches Council is currently converting its biodiversity corridor and threatened-entities layers into new Conservation zones under a revised LEP/DCP rather than relying on referral pathways alone. S5.2 vs S7.1

Section 5.2 concludes swift parrot occurrence is "rare and sporadic, even in important habitat" and warns planning decisions should not rely solely on recent sighting records. Section 7.1 then only mandates presence-assumption for BOS-triggered applications inside the BAM map; for all other applications, a single 20-minute survey over a 2 ha plot is merely "encouraged." This survey design is very likely to return false negatives for a species the SMP itself describes as unpredictable.

Make targeted surveys and/or a presence-assumption rule mandatory (not "encouraged") wherever suitable feed trees are present, consistent with the SMP's own ecological findings, regardless of BOS applicability.

Internal inconsistency within the SMP itself – Sections 5.2 and 7.1 should be reconciled. Table 1; S7.3, item 3

The $\geq 60\text{cm}$ DBH threshold used to define “important to retain” feed trees (including isolated backyard/park/road reserve trees) is coarse and excludes younger recruitment trees, despite the SMP acknowledging replacement trees take >20 years to mature (Crates et al. 2025; Owens et al. 2023).

Introduce a lower supplementary retention/permit trigger for feed tree species below 60cm DBH (e.g. a permit requirement for removal), to protect the recruitment cohort that will be needed to replace ageing feed trees over the life of this SMP.

Newcastle DCP Part C3 treats any tree $\geq 3\text{m}$ in height or $\geq 15\text{cm}$ DBH (single trunk) / $\geq 10\text{cm}$ (multi-trunk) as “declared vegetation” requiring a permit, alongside any vegetation providing threatened species habitat – a materially lower and more protective threshold than 60cm DBH. S7.3, item 3

The obligation to “protect and retain” large individual feed trees on private land (backyards, parks, road reserves) is stated without naming any enforcement instrument – no tree preservation order, no DCP permit trigger, no LEP clause is referenced.

Nominate the specific mechanism that will give this obligation effect (e.g. amendment to Council's tree/vegetation preservation DCP chapter to exempt swift parrot feed trees from routine removal approval pathways).

Tweed Shire's Tree and Vegetation Preservation Code explicitly distinguishes “very large trees” and “primary feed trees” from ordinary native trees, and disapplies standard removal exemptions to them – i.e. the protection sits inside an operative permit scheme, not just a policy statement. S7.3, item 7

The minimum 10m Urban Interface Area buffer for

Request the technical basis for the 10m figure and whether a species-

N/A – request for supporting technical justification.

6

Clause / Section Issue Recommendation Precedent / supporting reference

indirect impacts (vehicle collision, edge effects) is asserted without evidence it was modelled specifically for swift parrot edge sensitivity, despite the SMP's own discussion of noisy miner/rainbow lorikeet competitive exclusion and edge-related drying effects on flowering.

specific edge-effect distance (rather than the generic UIA buffer) should apply in mapped high-probability occupancy areas (identified in S5.2 as low-lying, productive coastal areas in the LGA's east). S9 (Monitoring, Evaluation and Reporting)

The five-yearly review cycle (first review 2030) has no interim trigger, despite the SMP's own data showing 597 ha of BAM-mapped habitat cleared 2000–2019 and a population viability analysis projecting functional extinction within c.20 years (Crates and Heinsohn 2025).

Add an adaptive-management trigger (e.g. a defined cumulative clearing threshold, or loss of a threshold number of confirmed high-value sites) that brings forward a plan review, rather than relying solely on the fixed five-year cycle.

N/A – recommend an adaptive trigger consistent with the SMP's own risk findings. S8 (Recovery Actions table)

All seven recovery actions are assigned to Council roles with no budget allocation, no hectare/number target, and no completion date, making Action 4 (“no loss of high value important habitat”) unmeasurable in practice.

Attach numeric, time-bound targets to each action (e.g. hectares restored/protected by conservation agreement per year) so performance against the SMP can be independently audited.

The Riverina Local Land Services (LLS) Swift Parrot Project reports concrete, auditable outputs – 522 ha of existing habitat protected, 124 ha of new habitat established, 42.6 km of new fencing – demonstrating that numeric targets and reporting are achievable for this species. Table 1; S7.3, item 3 (cf. Victoria)

The SMP’s assessment trigger is built around whether a site falls within the BAM map’s area-based buffer. An isolated large feed tree outside the mapped buffer can fall outside any assessment trigger altogether, regardless of its individual value to the species.

Add an independent “large tree” trigger that applies wherever a qualifying feed tree species of a defined size is proposed for removal, irrespective of whether the site falls within the BAM buffer or meets an area-based clearing threshold.

Victoria’s native vegetation removal framework (Clause 52.17 / NVIM tool) sets the permit assessment pathway according to three independent factors – the area of vegetation to be removed, whether any large trees are to be removed, and the location of the vegetation in the landscape – so a single qualifying large tree escalates the assessment pathway regardless of total area cleared. S6 (habitat mapping); S7.2

As above (row 2), the SMP’s stronger mapping layers (Crates et al. 2025, KBAs) sit outside the statutory planning framework.

In addition to the Ku-ring-gai/Northern Beaches comparators already cited, consider a Victorian-style overlay: apply an Environmental Significance Overlay- or Vegetation Protection Overlay-equivalent instrument in the Central Coast LEP/DCP over these layers, so a permit trigger applies automatically rather than remaining a discretionary consideration.

Victorian planning schemes use Environmental Significance Overlays (ESO) and Vegetation Protection Overlays (VPO) to make habitat and vegetation protection a binding permit trigger written directly into the planning scheme – e.g. the City of Greater Bendigo’s ESO1 applies statutory permit requirements over mapped environmental values in box-ironbark swift parrot habitat. Table 1; S7.3, item 3

Protected feed trees are defined solely by DBH, with no accompanying

Consider defining protected feed trees by trunk circumference (a simpler field measurement) and

Victorian Significant Landscape Overlays define a protected tree by trunk circumference and require a

7

Clause / Section Issue Recommendation Precedent / supporting reference

construction-setback buffer around an individually protected tree.

adding a mandatory building/works buffer around each protected tree, in addition to the site-wide UIA buffer.

permit both to remove or trim a protected tree and to undertake building works within four metres of one – protecting the tree itself and its immediate root/canopy zone. S7.4 (Mitigation measures)

Mitigation and avoidance measures apply as fixed, year-round spatial buffers, with no mechanism to increase protection during confirmed periods of swift parrot presence or foraging – despite Section 5.3 establishing that flowering, and therefore occupancy, is highly seasonal and patch-specific.

Add a seasonal/behavioural exclusion condition: where swift parrots are confirmed foraging on or near a site, disturbing activities (clearing, construction noise, vehicle movements) should be excluded or curtailed for the duration of that foraging period, in addition to the standard spatial buffer.

Special Management Zone requirements built into Victorian Forest Management Plans protect all larger trees at identified swift parrot sites from harvesting and exclude all activities likely to disturb the birds while foraging within the area – a time-based protection layered on top of the spatial one. S7.3, item 3; S8

There is no dedicated, publicly listed register of individually significant feed trees on private and public land outside forest areas, making the “protect and retain” obligation hard to administer or communicate to landowners.

Establish a Significant Feed Tree Register, cross-referenced to development application checks, alongside a Habitat Connectivity Plan.

The City of Greater Bendigo's Biodiversity Strategy commits to a Significant Tree Register to ensure registered trees are properly protected, and a Habitat Connectivity Plan to create biolinks across the municipality – a two-part model directly transferable to Central Coast's feed tree context. SMP scope vs Strategic Conservation Plan

The SMP does not state how it would interact with The Department of Planning's Draft Strategic Conservation Plan (SCP), which remains a draft document currently under assessment, having drawn substantial community objection when placed on public exhibition in December 2025. As drafted, the SCP proposes biodiversity certification over identified growth precincts (e.g. Greater Warnervale, Greater Lake Munmorah, Somersby); certification would streamline vegetation clearing approval across an entire precinct upfront if adopted in anything like its exhibited form. With both documents still being finalised, there is a live risk the two instruments proceed on inconsistent terms.

Amend the SMP to state explicitly how it would apply to any land subject to biodiversity certification under the draft SCP, and require that any precinct-wide certification assessment apply the same feed tree mapping, survey and avoidance standards set out in this SMP. Because the draft SCP remains under assessment, Council has the opportunity to resolve this consistency issue now, and if this is not possible within a reasonable time frame, the final Plan should identify the issue as an unresolved implementation risk and include a specific action requiring Council to continue liaising with the Department of Planning to ensure that high-value and irreplaceable Swift Parrot habitat is excluded from certified urban capable land and that the final Strategic Conservation Plan does not undermine the protections established by the SMP.

N/A – internal Council document conflict; recommend Council resolve directly between the two instruments, particularly given the SCP remains subject to further assessment and community consultation following its December 2025 exhibition.

8

Clause / Section Issue Recommendation Precedent / supporting reference S7.2/S7.3 vs exempt and complying development

The assessment and avoidance measures in Section 7 are framed around development applications. Vegetation removal under complying development codes, or under bushfire-related vegetation clearing entitlements (the “10/50” provisions), does not require a development application and so falls outside the SMP's stated pathway altogether – including on private urban land where confirmed recent large flocks have relied on backyard and street trees.

Extend feed tree protections to exempt and complying development pathways – for example by requiring a permit (rather than an exemption) to remove a mapped feed tree species above the retention threshold, and by clarifying that bushfire-

related clearing entitlements apply only to the minimum extent necessary for direct risk mitigation, not to unrestricted removal of mapped feed trees.

N/A – regulatory gap between the SMP's scope and the exempt/complying development framework. S8 (Recovery Actions) – implementation

The Recovery Actions table does not identify how any proposed measure would be resourced or enforced – there is no reference to funded compliance capacity to investigate unauthorised removal of protected feed trees, nor to any incentive scheme for private landholders who retain mature feed trees.

Add a recovery action committing funded compliance capacity to investigate reported feed tree removals, and a landholder incentive mechanism (e.g. rate rebates or voluntary conservation agreements) for retaining mature feed trees on private land.

N/A – implementation and resourcing gap. S9 (Monitoring, Evaluation and Reporting)

Beyond the adaptive review trigger already recommended above, the SMP sets no overall ceiling on cumulative foraging habitat loss across the LGA – meaning incremental approvals could continue indefinitely provided each individual application satisfies the SMP's avoidance and mitigation tests.

In addition to an adaptive review trigger, consider a defined LGA-wide limit on cumulative net loss of mapped foraging habitat, with approvals tracked against that limit and a mechanism to pause further approvals if the limit is reached.

N/A – a stronger, LGA-wide version of the adaptive-trigger recommendation already made above. S7.4 (Mitigation measures)

Section 7.4 states that mitigation should not be relied upon to replace loss of moderate-high quality habitat, but offsetting remains available as a residual pathway for approved impacts, with no published methodology for what constitutes an adequate offset, and no engagement with the substantial evidence – both general and species-specific – that offsetting does not reliably deliver the biodiversity outcomes it is

Exclude credit-based offsetting entirely for confirmed high-value swift parrot foraging habitat, consistent with the “avoid” step under the BC Act being given genuine primacy over “mitigate.” Where offsetting is nonetheless proposed for lower-value or marginal habitat, require a published, independently audited methodology demonstrating like-for-like replacement within a stated, ecologically meaningful timeframe, with the burden on the proponent to demonstrate feasibility rather than on Council to disprove it.

Maron et al. (2012) found that only around 20% of restoration projects reviewed achieved full success in recovering biodiversity values, identifying time lags, uncertainty and poor measurability as structural limits on what offsetting can deliver. The NSW Audit Office (2022) found the state's own Biodiversity Offsets Scheme could not match roughly 90% of credit demand to available supply and could not demonstrate that biodiversity gains were keeping pace with losses. For the swift parrot specifically, Webb, Stojanovic and Heinsohn (2019) document a long-

9

Clause / Section Issue Recommendation Precedent / supporting reference

meant to secure (see Section 2.9).

standing pattern of conservation policy failing to keep pace with the scientific evidence for this species.

4. Summary of requested actions

-

Correct the citation of the EP&A Act in Section 1.

-

Give the Crates et al. (2025) model and mapped KBAs a defined statutory role in assessment, rather than leaving them discretionary, following the Ku-ring-gai/Northern Beaches model of embedding biodiversity mapping directly into LEP/DCP clauses.

-

Make targeted bird surveys (or a presence-assumption default) mandatory wherever suitable feed trees occur, consistent with Council's own findings on occurrence patterns.

-

Introduce a supplementary, lower DBH retention/permit trigger for feed tree species below 60cm DBH.

-

Name the specific enforcement instrument for protection of large feed trees on private and public land outside forest areas.

-

Provide the technical basis for the 10m Urban Interface Area buffer, or adopt a species-specific edge-effect distance in high-probability occupancy areas.

-

Add an adaptive-management trigger to bring forward the five-yearly plan review where defined clearing or loss thresholds are reached.

-

Attach numeric, time-bound targets to each Recovery Action so performance can be independently audited.

-

Add an independent "large tree" assessment trigger (following Victoria's Clause 52.17 / NVIM model) so a qualifying feed tree cannot escape assessment simply by falling outside the mapped BAM buffer.

-

Define protected feed trees by trunk circumference and add a building/works buffer around each protected tree, in addition to the existing site-wide UIA buffer.

-

Add a seasonal/behavioural exclusion condition tied to confirmed swift parrot foraging activity, layered on top of the standard spatial buffer.

-

Establish a Significant Feed Tree Register alongside a Habitat Connectivity Plan.

-

Acknowledge explicitly in the SMP that local measures, however rigorous, are necessary but not sufficient for a migratory species whose survival depends on equivalent protection across its entire winter range, and commit Council to advocating for comparable rigour elsewhere in that range.

-

Clarify how the SMP applies to land subject to biodiversity certification under the draft Strategic Conservation Plan (SCP) – which remains under assessment following significant community objection to its December 2025 exhibition – so that certified growth precincts cannot bypass the SMP's survey, mapping and avoidance requirements.

-

Extend feed tree protections into exempt and complying development pathways, including bushfire-related clearing entitlements, so backyard and street trees on private urban land are not left outside the SMP's assessment framework.

-

Commit funded compliance capacity and a landholder incentive mechanism (e.g. rate rebates or conservation agreements) to support enforcement and voluntary retention of feed trees on private land.

-

Consider a defined LGA-wide cumulative loss limit for mapped foraging habitat, in addition to the adaptive review trigger recommended above.

-

Exclude credit-based offsetting entirely for confirmed high-value swift parrot foraging habitat, and require a published, audited replacement methodology for any offset proposed elsewhere – supported by general restoration-ecology evidence, the NSW Audit Office's own findings on the Biodiversity Offsets Scheme, and the species' documented history of policy lagging behind the science.

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Tweed Shire Council, Development Control Plan Section A16 – Tree and Vegetation Preservation Code.

REDACTED
7 August 2026.
Attention REDACTED, Senior Strategic Planner
Please find below my submission on the Draft Swift Parrot Species Management Plan
Central Coast Council – Public exhibition closing 10 August 2026
This submission responds to the Draft Swift Parrot Species Management Plan (“the SMP”) on public exhibition.
The need for a strong species management plan for this species is supported, noting also that other endangered species such as the Grey-headed flying fox and Regent Honey Eater amongst others also share and benefit from this same habitat and its protection.

1. The protections and monitoring/compliance for existing foraging trees in the SMP are clearly inadequate as there are no clear mechanisms to ensure the aspirations are met or enforced. This should be corrected in the final SMP.

2. Given the critical status of this species, the time frames involved in achieving habitat restoration, the lack of available offsets and the general failure of the offsets mechanisms to meet their objectives, the use of offsets should be explicitly excluded from this SMP. Retention and protection of existing foraging resources having primacy together with on-going habitat restoration works.

3. Younger trees require protection too, not just the biggest old ones. The plan only protects trees above a certain (very large) size. A new tree takes 20 years or more to become useful feeding habitat – so the SMP needs to protect the next generation of feed trees now, not just the oldest survivors.

4. The mapping should include and give special protection to government funded Swift Parrot Habitat Restoration project sites such as i) the Bateau Bay swift parrot habitat restoration project and ii) Kahibah Creek habitat restoration compensatory planting works.

i) The grant (REDACTED, Environmental Restoration and Rehabilitation Program, 2019 round — Community Grants stream):

- Recipient: REDACTED.
- Project title: Bateau Bay swift parrot habitat restoration project
- Amount: REDACTED
- Duration: 3 years (2019 round, so approximately 2020–2023)
- Site: REDACTED site, (approx. 5.1 hectares)
- Description (as published by the Trust): weed control in established vegetation, annual community tree-planting days, and community participation in bird surveys and revegetation, aimed at building local awareness of large old feed trees important to the swift parrot and other threatened species in the Stepping Stones corridor.

ii). The compensatory planting of E. Robusta and other feed trees and on-going restoration undertaken by REDACTED 2007 – 2018 along Kahibah Creek, Umina Beach, mandated by REDACTED in relation to foraging habitat for the Swift parrot, Grey-headed flying fox and Regent Honey Eater with strict conditions to compensate for the removal of trees for drainage works around REDACTED. These works were determined to have a significant environmental impact on several endangered species (as above) and compensatory planting and maintenance was required. These plantings are now approximately 20 years old and it is critical that they are recognised as having been publicly funded and specifically planted as foraging resources for these endangered species. The plantings need to be protected and maintained into the future, given both the significant financial investment by Council and their critical role in supporting the survival of the swift parrot and other endangered species. The approval and conditions are attached for reference.

Given this land is classified as operational land – clarification of protections in place should be documented in the SMP.

Yours sincerely
REDACTED

Dear Central Coast Council,

I am writing to formally object to the proposed removal of the large, well-established gum tree located on REDACTED.

REDACTED

I understand that the resident of REDACTED has requested the removal of this tree for approximately six years, primarily due to concerns such as fallen leaves and general maintenance. I also understand that Council has previously declined these requests, but that a recent issue involving an underground water pipe has now prompted Council to agree to its removal.

I strongly request that Council immediately place the proposed removal on hold and fully investigate all reasonable alternatives that would allow the tree to be retained.

This tree is not simply a source of leaf litter or an inconvenience. It is a mature piece of established wildlife habitat that is used continuously by a wide variety of native birds. On any given day, I personally observe galahs, rainbow lorikeets, Australian magpies, pied butcherbirds, sulphur-crested cockatoos, yellow-tailed black-cockatoos and noisy miners feeding, resting, sheltering and interacting within this single tree.

Most importantly, I have recently observed what appear to be Swift Parrots using the tree and the immediate area. The Swift Parrot is listed as critically endangered under Commonwealth environmental legislation. Habitat loss and degradation are recognised as major threats to the species' survival. Swift Parrots migrate from Tasmania to mainland south-eastern Australia, including New South Wales, where they depend heavily on suitable flowering eucalypts and other established trees for food during the non-breeding season.

Because Swift Parrots are highly mobile and follow flowering resources across the landscape, individual feeding trees can be important even where the birds are only present seasonally or intermittently. The fact that the tree is situated on a suburban nature strip does not diminish its potential value. In increasingly developed coastal suburbs, established street trees can provide essential connections between larger habitat areas and give threatened and other native birds places to feed, rest and move through the landscape.

The REDACTED's National Recovery Plan for the Swift Parrot identifies habitat loss and degradation as key threats to the species. Removing a mature tree that may be used by Swift Parrots without first conducting an appropriate ecological assessment would therefore be deeply concerning. The tree should not be removed merely because its leaves create maintenance or because removal may be the simplest response to an infrastructure problem.

Mature trees cannot be meaningfully replaced by planting a small sapling elsewhere. A replacement tree may take decades to provide comparable canopy, flowering resources, shelter and habitat value—and there is no guarantee that it ever will. The cumulative loss of individual established trees is precisely how urban habitat and wildlife corridors are gradually diminished.

Council itself recognises that the Central Coast is valued for its abundant bushland and natural environment, and it has promoted street-tree planting as a way to increase shade, cool suburbs and improve local communities. Removing a healthy, established habitat tree without exhausting all feasible retention options would appear inconsistent with those objectives.

Before any work proceeds, I formally request that Council:

Immediately suspend the proposed removal of the tree.

Arrange an inspection by a suitably qualified consulting arborist who is independent of the removal contractor.

Arrange an ecological assessment by a qualified ecologist or threatened-species specialist, specifically considering the tree's use by Swift Parrots and other native birds.

Assess the tree during an appropriate observation period, rather than relying on a single brief inspection when birds may not be present.

Investigate engineering alternatives for repairing, replacing, relocating or protecting the affected water infrastructure without removing the tree.

Consider root-sensitive excavation, directional boring, pipe sleeving, root barriers, selective root management or other arborist-supervised solutions.

Confirm whether the tree contains nests, hollows, active roosting sites or other habitat features.

Provide residents with the arborist's report, ecological assessment, reasons for the proposed removal and details of the alternatives considered.

Undertake meaningful consultation with nearby residents before making any final decision.

I have gathered numerous signatures from fellow REDACTED residents who also oppose the removal of this tree. This demonstrates that the concern is not limited to one household. The tree is part of the character and environmental value of the broader neighbourhood, and its removal would affect the entire local community.

I respectfully ask Council not to treat the preference of one resident for reduced leaf litter as outweighing the interests of the wider community or the ecological importance of a mature native tree. Infrastructure concerns must of course be properly addressed, but tree removal should be the absolute last resort—not the most convenient option.

Please treat this email as a formal objection and an urgent request that no removal, major pruning or other irreversible work be undertaken until the necessary arboricultural and ecological investigations have been completed and affected residents have been informed.

Please provide written confirmation that the removal has been placed on hold, together with the relevant Council reference number, assessment reports and proposed next steps.

Kind regards,

REDACTED
REDACTED
REDACTED

Hello folks,

Here's my overview of concerns about the draft policy.

In some respects its very difficult to assess the actual impacts of the proposed policy unless and until we can view the detailed mapping.

Essentially, it seems to me to be saying that any site with feed species is off limits, unless all feed trees are able to be preserved, and even then with qualifications. I'm also concerned that a key map is unavailable to anyone other than an accredited person. This automatically bumps up costs. In addition, we are presented with several maps, all showing somewhat different things. Some have buffers built in, all seem to make various assumptions. Are all intended to apply simultaneously? This is unclear to me.

I understand the importance of feed species including dispersed ones. I also note that compensatory plantings are stated to take about 20 years to achieve effectiveness. There is a statement about that, but no evidence. The question in my mind is, however, how critical each area of feed species actually is? There's fairly strong evidence in the policy that low areas, close to water, are pretty central. How important are individual trees? The issue of a buffer around groups of 5 or more also seems to be without justification.

I think another question is what the legal provenance of this plan is. Under what statute is it being developed? I can't see that stated clearly in the document. I suspect we are seeing another example of CCC over-reach in the ecological area, in particular without a sound statutory basis. I also note that the expert group behind the policy did not appear to involve any urban and regional planners.

I also don't see how this talks to the CCSCP. At a high level glance, it appears that there is likely overlap with a number of development sites nominated in that plan.

These are my first level thoughts from my initial read through.

Kind Regards

REDACTED

Submission in Support of the Draft Swift Parrot Species Management Plan
To: Central Coast Council

I write in support of the Draft Swift Parrot Species Management Plan and congratulate Council for preparing a document that takes a strategic and evidence-based approach to the conservation of one of Australia's most endangered migratory birds.

The Draft Plan recognises that the Central Coast contains significant Swift Parrot habitat and appropriately identifies the importance of habitat connectivity, landscape-scale conservation and the cumulative impacts of habitat loss. Importantly, the Plan acknowledges that planning decisions should not rely solely on recent sighting records and that protecting habitat networks is critical to the long-term survival of the species.

I particularly support the identification of:

- BAM Swift Parrot Important Habitat areas;
- Key Biodiversity Areas around Brisbane Water and Tuggerah Lake;
- additional habitat identified through the REDACTED et al. (2025) habitat modelling;
- the importance of ecological connectivity and habitat corridors; and
- the recognition that small-scale but cumulative habitat loss poses a significant threat to the species.

The Plan provides a much more detailed and place-based understanding of biodiversity values on the Central Coast than many other strategic planning documents currently on exhibition.

However, while I support the Draft Swift Parrot Species Management Plan, I am concerned about how effectively it can be implemented if its priorities are not reflected within Council's broader strategic planning framework.

Council is currently exhibiting both the Draft Swift Parrot Species Management Plan and the Draft Local Strategic Planning Statement (LSPS). When these documents are compared, a significant disconnect becomes apparent.

The Swift Parrot Plan identifies important habitat areas and biodiversity values associated with locations including:

- Brisbane Water;
- Kariong;
- Kincumber;
- Patonga;
- Pretty Beach;
- Bouddi National Park;
- Killcare Heights;
- Tumby Umbi; and
- Lake Munmorah.

Yet many of these strategic biodiversity values are not clearly reflected in the Draft LSPS mapping.

The LSPS generally identifies residential land, employment land and environmental land but does not separately identify:

- Swift Parrot habitat;
- Key Biodiversity Areas;
- ecological corridors;
- habitat connectivity networks;
- strategic biodiversity areas; or
- the Coastal Open Space System (COSS).

This creates a risk that the biodiversity objectives of the Swift Parrot Plan will not be effectively integrated into future land-use planning decisions.

The Peninsula provides a particularly clear example.

The Draft Swift Parrot Species Management Plan identifies Brisbane Water as a Key Biodiversity Area and recognises Kariong and surrounding areas as important habitat. However, the Peninsula section of the Draft LSPS focuses largely on housing, transport-oriented development, cycling connections and public amenity, with little strategic recognition of biodiversity corridors, habitat connectivity or opportunities to expand and strengthen the Coastal Open Space System.

Similarly, the Draft Swift Parrot Species Management Plan identifies the importance of protecting habitat networks and ecological connectivity. Yet the LSPS does not map ecological corridors, Key Biodiversity Areas or existing and proposed COSS lands.

This is a significant omission because many of the areas that function as Swift Parrot habitat also provide broader biodiversity values, wildlife corridors and landscape connections for numerous other species.

I am also concerned that the LSPS places strong emphasis on housing growth, employment lands and development opportunities while providing comparatively little detail regarding how biodiversity priorities identified within the Swift Parrot Plan will be protected and enhanced over the next twenty years.

If Council is serious about conserving Swift Parrot habitat, then the conservation priorities identified in this Plan must be embedded within its broader strategic planning framework.

Accordingly, I recommend that Council:

- Adopt the Draft Swift Parrot Species Management Plan;
- Amend the Draft LSPS to incorporate the habitat priorities identified within the Plan;
- Include mapping of Key Biodiversity Areas, Swift Parrot habitat and ecological corridors within strategic planning documents;

-

Map and strengthen the Coastal Open Space System as a key biodiversity conservation mechanism;

-

Ensure future growth precincts and development investigation areas are assessed against habitat connectivity objectives; and

-

Develop measurable targets for habitat protection, restoration and connectivity.

The Draft Swift Parrot Species Management Plan provides a strong foundation for biodiversity conservation on the Central Coast. However, its success will ultimately depend on whether its recommendations are genuinely reflected in Council's broader planning framework.

The Plan identifies where biodiversity matters. Council's strategic planning documents must now demonstrate how those places will be protected.

Yours sincerely

REDACTED

Dear Strategic Planning Team,

I am writing to formally lodge my feedback on the Central Coast Council's Draft Swift Parrot Species Management Plan.

As a local resident, I am deeply concerned by the finding that the wild swift parrot population has plummeted to roughly 750 adult individuals, putting the species on a trajectory toward functional extinction within 20 years. Because the Central Coast provides a vital coastal winter refuge during inland droughts, our local planning decisions carry national significance.

While I support the creation of this management plan, I believe it needs to be strengthened to address the immediate, active threats occurring on the ground. I respectfully ask that Council consider the following constructive recommendations, led by the urgent situation at Kincumber Quarry:

1. Key Focus Area: Managing Kincumber Quarry (45-REDACTED) Activities and Future Transition

The current situation at Kincumber Quarry, including the ramping up of active mining and extraction operations, poses an immediate threat to the neighboring swift parrot habitat. The resulting increase in industrial noise, heavy machinery vibration, and dust generation directly disrupts the quiet foraging environment the parrots rely on, while ongoing clearing on the site gradually encroaches on the surrounding forest. Furthermore, the active proposal to transition this site into an 8-hectare, multi-lot residential subdivision represents a severe long-term threat of cumulative, incremental habitat loss. Because the quarry shares an immediate boundary with the Narrabeen Coastal Blackbutt Forest of Kincumber Mountain Regional Reserve, its current and future state impacts the adjacent swift parrot population in several ways:

- * **Canopy Clearing of Blackbutt Forest:** The quarry is surrounded by a critical ecological buffer. Blackbutt (*Eucalyptus pilularis*) is explicitly recognised in Council's Draft Swift Parrot Species Management Plan as a primary winter foraging tree, critical for its production of sugary lerp insects.
 - * **Soil Compaction and Hydrological Devastation:** Preparing this steep, rugged quarry site for residential lots requires importing and compacting over 200,000 tonnes of fill dirt. This massive earthwork risks disrupting local hydrology, altering water tables, and potentially stressing the root systems of mature *Eucalyptus* in the surrounding area.
 - * **Creating "Urban Edges" for Aggressor Birds:** The draft plan warns that territorial species like Noisy Miners and Rainbow Lorikeets thrive in urban "edge" environments and exclude swift parrots. Carving a residential subdivision directly into Kincumber Mountain's boundary creates a massive artificial edge, allowing these aggressive competitors to dominate the reserve's canopy.
 - * **Erosion and Siltation:** The steep slopes of the quarry present a high risk of sediment runoff. Inadequate environmental controls during major subdivision earthworks risk washing fine silts and contaminants down the mountain, degrading the low-lying ecosystems where the parrots' primary winter food source, the Swamp Mahogany (*Eucalyptus robusta*), grows.
- Recommended Action:** I respectfully request that Council consider phasing out active quarrying operations at this site to prevent further habitat degradation. Ultimately, rather than allowing a residential subdivision, Council should explore options to absorb this land into the adjoining Kincumber Mountain Regional Reserve as a dedicated, legally protected habitat area. In the interim, I urge Council to mandate strictly monitored, zero-clearing environmental buffer zones around active industrial/quarry interfaces and subject any proposed changes to a mandatory Serious and Irreversible Impact (SII) assessment.

2. Proactive Environmental Rezoning of the 31% Conflicted Habitat

The draft plan notes that 31% of the swift parrot's mapped "important habitat" is currently zoned for residential, commercial, or industrial use. Leaving these areas zoned for development invites constant clearing pressure.

Recommended Action: I recommend that Council proactively initiate planning proposals to rezone these identified habitat areas into Environmental Conservation zones (such as C2) to protect them before development applications are submitted.

3. Establish a Strict Policy on Cumulative and Single-Tree Loss

The draft plan acknowledges that small-scale, sequential habitat loss—including of individual trees in urban backyards—is causing significant cumulative impacts.

Recommended Action: I request that Council enforce a strict clearing protection policy for the four primary feed tree species—Swamp Mahogany, Blackbutt, Spotted Gum, and Forest Red Gum—across the LGA, ensuring that even isolated mature trees are preserved.

4. Prioritize Habitat Avoidance Over Biodiversity Offsets

The document points out that the swift parrot is highly unlikely to respond to standard management due to the immense time lags associated with habitat restoration. A sapling takes decades to become a viable foraging tree; a species with only 20 years left cannot wait for an offset plot to mature.

Recommended Action: I encourage Council to mandate a policy of genuine habitat avoidance for the swift parrot. The Biodiversity Offsets Scheme (BOS) should not be treated as an automatic pathway to clear; if a project impacts verified foraging habitat, it should be redesigned to avoid those impacts.

5. Clarify SII Refusal Guidelines

The swift parrot qualifies as a species at risk of a Serious and Irreversible Impact (SAIL) due to its rapid rate of decline. Under Section 7.6(2) of the NSW Biodiversity Conservation Act 2016, Council has the explicit legal authority to refuse development consent if a project causes an SAIL.

Recommended Action: I request that the final plan state clearly that any local development proposal requiring the removal of confirmed, high-value swift parrot foraging habitat will be treated as an SAIL by Council, leading to a refusal of consent.

6. Enhance Public Transparency for Habitat Mapping

The draft specifies that the BAM swift parrot important habitat map has legal authority but is "not publicly accessible," remaining restricted to accredited ecological assessors.

Recommended Action: In the interest of community-led conservation, I request that Council integrate this mapping layer into its public local environmental mapping portals so the community can transparently see and help protect these habitats.

The situation at Kincumber Quarry demonstrates that we cannot continue to participate in the incremental fragmentation of crucial winter refuge habitat. I urge the Council to act protectively, listen to the warning signs outlined in its own draft document, and prioritise the survival of this critically endangered species.

I look forward to seeing these constructive changes reflected in the finalised Species Management Plan.

Yours sincerely,

REDACTED

Below is a list of the trees that swift parrots feed on depending on time of year.

Council and communities can assist greatly by FUTURE-PROOFING their food sources.

Council nursery at Erina and other sources can grow and supply large quantities of the trees to be planted in so many places around the Central Coast.

BUT

We need to start now!

Regards

REDACTED

Sent from my iPad

I strongly support the conservation and protection of the Swift Parrot ; this is why it is absolutely essential to preserve and not destroy the Kincumber Wetlands and not allow a Woolworths supermarket to be built there.

I request that CCC actively lobby Woolworths and the Aboriginal Land Council to leave this priceless piece of land alone so that the Swift Parrot can feed and nest there.

REDACTED