

To : Director Planning Coordination and Support
Department of Planning & Environment

From: Marion Riordan
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I would like to make the following comments on the North Coast E Zones Review currently under consideration.

Firstly the E Zones in the Tweed LEP 2012 were developed via direct translation of former environmental zones from the Tweed LEP 2000. Consequently the extensive research, records and planning by Tweed Shires Natural Resources staff that was to inform the Tweed LEP 2012 has been ignored and overlooked.

As a result the environmental protection of much of the Tweed's most significant areas has been reduced from E2 Zoning to E3 or RU2 leaving them virtually unprotected from potential damage.

Following are a list of areas that **should be rezoned to E2** in order to preserve the environment and biodiversity of the Tweed - which is arguably its greatest asset.

- 1 All high conservation lands that border onto and buffer National parks and Reserves be (including Wollumbin, Border Ranges, Mt Jerusalem and Mebbin National Parks and Couchy Creek & Cudgen Nature Reserve)
- 2 Documented Wildlife corridors linking National Parks, conservation areas, and private land. Corridors include: Cudgen, Byrrill Creek, Tweed Border Ranges/Mt Clunie, Billinudgel/Mooball, Limpinwood and Couchy Creek areas
- 3 Much of the Tweed Shire hinterland's steep & rugged forest, classified as scenic steep escarpment (eg land surrounding Wollumbin National Park)
- 4 Due to their endangered status, all documented Koala Habitat and Koala Corridors along the Tweed Coast coastal strip, (Wooyung, Pottsville, Cabarita). Similarly, Koala Habitat areas in the western areas of the shire (Byrrill Creek, Mt Chowan, Doon Doon, Hopkins Creek)
- 5 Tweed's high conservation Riparian areas alongside tributaries to the Tweed River should be protected with E2 (or at least E3 zoning) for instance Couchy Creek and Byrrill Creek.

Furthermore I am highly concerned about the Dept of Plannings's recommendation that "extensive agriculture should be allowed without consent in E3 zones". Much of the area currently mooted for E3 zoning is very steep land adjoining National Parks and not suitable for agricultural pursuits for obvious reasons.

Similarly the recommendation that land mapped as "State significant Farmland" be converted to rural zoning is highly concerning as this may pave the way for inappropriate urban development on our most productive agricultural land.

I would like to add that much of my concerns are broadly shared by residents of the Tweed. Over one thousand submissions were received by Council regarding Draft LEP 2012 and a further 450 relating to Draft LEP 2010. Virtually all of the submissions to Council favoured extension of E zones and greater environmental protection than that proposed by Council.

Then - in 2013 - another 194 submissions were sent to consultants on the E zone Review expressing concerns about the inadequate protection of environmentally significant areas in the Tweed including habitat, flora & fauna and especially, coastal Koala habitat.

The situation facing the Tweed coast koala's is particularly disturbing as they may be facing extinction and have recently been given 'vulnerable' status. This makes it *imperative* that primary koala habitat is mapped in a Koala Plan of Management and included in a E2 zone.

I strongly object to Council overlays, particularly the Tweed Biodiversity overlay, being deemed only for use in “matters of health, safety, risk & hazard”. This is a narrow and counter-productive position as the protection of Tweed’s natural environment is extremely valuable both for what it gives to biodiversity and how it enhances the desirability of the Tweed as a place to live and do business. The Biodiversity (and other) overlays should be utilised for all the research and information they contain to *inform* the areas to be zoned E2 & E3.

I commend that the review stresses the need to protect high conservation value vegetation however it concurrently recommends a downgrade to the zoning of rainforest, old growth forest, wetlands, mangroves and riparian vegetation from E2 to E3. These are all of exceptional conservation value and deserve the highest protection.

The review has recommended that all land designated within an environment zone be a priority area for the application of incentive based mechanisms, including financial incentives, rate rebates, management assistance, and local award schemes. Whilst I wholeheartedly agree with such mechanisms this would seem a futile exercise whilst the appropriate areas of vegetation remain *outside* of environmental zoning.

Your Truly,
Marion Riordan