STEP Inc

Community-based Environmental Conservation since 1978

June 5 2014

Director
Planning Coordination and Support
Department of Planning & Environment
GPO Box 39
Sydney 2001

Re: Northern Council's EZone Review, Interim Report 30 September 2013

STEP Inc is the largest community environmental group in the northern Sydney region. It has over 400 members and has been operating in the Ku-ring-gai and Hornsby area for over thirty years.

While STEP supports the retention of E zones there are several recommendations in the consultant's report that we strongly object to. These will be considered in turn.

Criteria for the application of the E2 Environmental Conservation Zone

STEP strongly objects to the highly restricted criteria that have been adopted for the E2 zone. We believe many areas that have exceptional environmental value should be added to the E2 zoning criteria that will be finally adopted for state-wide use. These areas include:

- SEPP 19 Urban Bushland areas (applies to Sydney Metropolitan Area)
- Land identified within a validated spatial dataset comprising areas of old-growth forest, defined as an ecologically mature forest where the effects of disturbances are now negligible (Commonwealth of Australia 1997)
- Land identified within a validated spatial dataset comprising areas of native vegetated riparian, wetland and estuarine other than SEPP 14 mapped areas
- Land identified within a validated spatial dataset comprising areas of rare, endangered and vulnerable forest ecosystems based on criteria defined by the Joint ANZECC/MCFFA National Forest Policy Statement Implementation sub-committee (JANIS) (Commonwealth of Australia 1997).
- Wildlife corridors mapped by the Office of Environment and Heritage

Current and future climate change will place our natural ecosystems under significant stress. The preservation of corridors for migration of species and the transfer of genetic material to enhance the capacity to adapt to changing environmental conditions are key environmental values that must now be fully recognised. Vegetated riparian corridors play a particularly important role in providing connectivity in cleared rural landscapes.

Permissibility of extensive agriculture in E2 zones

STEP strongly objects to allowing extensive agriculture with consent within an E2 zone. Uses, such as grazing, are known to cause significant damage to the biodiversity values of these areas. For example "A major impact of grazing is prevention of seedling establishment, and grazed areas often have a number of elderly trees with no juveniles to replace them. This effect is particularly

significant in remnant vegetation." [1]. Allowing extensive agriculture with consent in areas of high environmental value would be incompatible with the primary purpose of the E2 zone.

Permissibility of extensive agriculture in E3 zones

STEP objects to the permissibility of extensive agriculture without consent in E3 zones and believes it should only be allowed with consent. Areas that qualify for E3 still have significant environmental values and many extensive agriculture activities, such as grazing and production of fodder crops, if carried out in the more sensitive areas, would be incompatible with sustaining these values. There needs to be control on where such activities are allowed. This would not be possible if extensive agriculture was allowed without consent.

Application of the E4 zone

If the E4 zone is to be replaced by a residential zone then STEP supports the consultant's recommendation that protection of sensitive environmental attributes in these areas should be achieved by means of appropriate overlay maps and clauses. STEP strongly objects to the Department of Environment and Planning's response that the protection and management of important vegetation in these areas can be addressed through clause 5.9 of SILEP.

Significant weakness in Clause 5.9 include:

- sub-clause 5 – "This clause (5.9) does not apply to a tree or other vegetation that the Council is satisfied is dying or dead and is not required as the habitat of native fauna". There is no requirement for replacement or regeneration. Particular types of land use may inhibit or preclude this. In practice it leads to short term preservation of existing vegetation rather than its long term conservation.
- its application to smaller shrubs and ground covers, which often represent the **dominant** biodiversity component of the vegetation. In practice it is very hard to observe when they have been removed and this makes enforcement of the provision impractical.

For the above reasons it is STEP's view that significant vegetation needs to be included as an environmental overlay on the LEP map with special provisions and the vegetation's condition needs to be monitored to ensure its long term survival. The long term survival of Koalas in residential areas would not be possible without such provisions.

References

[1] Benson D, Howell J, McDougall L, Mountain Devil to Mangrove, A Guide to Natural Vegetation in the Hawkesbury- Nepean Catchment, Royal Botanic Gardens Sydney, 1996, p62.

Yours sincerely

Jill Green

Jill Green
President