

Andrew Murray
2/59 Centennial Circuit
Byron Bay NSW 2481

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

Dear Sir/Madam

re: Review of Environmental Zones in Far North Coast

Thank you for the opportunity to comment on the Northern Councils EZone Review Interim Report.

I am a resident of Byron Shire and have worked as a botanist and environmental consultant on the Far North Coast of NSW since 1985. I have experience in vegetation mapping and management in Tweed, Byron, Lismore and Ballina Shires.

I am a strong supporter of the Review's endorsement of Environmental Zones and overlays to protect natural systems and biodiversity in the far north coast council LEPs. I also support the recommendation that Ezones be expanded in the Lismore, Kyogle, Ballina and Tweed to include all environmentally sensitive areas not currently protected. It is clear from the Review that the NSW Government needs to act urgently help Councils review vegetation mapping to improve its accuracy, and help Kyogle, Lismore and Ballina Councils to undertake comprehensive mapping of all high conservation value vegetation in order to expand their environment zones.

I agree with recommendation that overlays be used to support environmental protection of buffers to estuaries, wetlands, streams and rainforests. I also support the development of guidelines for mapping scenic amenity and using those maps as overlays to require consideration of broader landscape constraints.

Throughout the Review, the term "validated dataset" is used without any clear definition of standards or accuracy. This needs clarification, and should include any data produced by generally-accepted scientific methods for assessment of environmental conservation significance.

For land subject to coastal hazards, I support the recommendation to remove cleared lands from the E2 zone, but rather than be used as an overlay, I consider that a Coastal Hazard

Zone should be created to deal with sea-level rise and coastal development all along the NSW coast.

I strongly object to downgrading of rainforest, old growth forest, wetlands, mangroves, riparian vegetation and 'rare, endangered and vulnerable ecosystems' from E2 to E3 (Recommendation 1 & 7). These areas are all of exceptional conservation value and deserve the highest protection. These values must remain under the protection of E2 zones as explicitly recommended by the NSW Department of Planning and Industry (Practice Note PN 09-002 – Environmental Protection Zones), and as is prescribed throughout the remainder of NSW. In combination with the recommendation to allow extensive agriculture without consent in the E3 zone, the Review's recommendations for downgrading rainforest, old growth forest, wetlands, mangroves, riparian vegetation and 'rare, endangered and vulnerable ecosystems' are a prescription for wide-spread unregulated degradation of ecological values in environmentally sensitive areas.

I also object to allowing 'extensive agriculture' such as grazing, cropping and irrigated pasture within E2 zones subject to development consent (Recommendation 4). This land use actively degrades the high conservation values that have defined the zone. I do not support allowing extensive agriculture in E3 zones without development consent.

Downgrading proposed E4 zones to residential zones (Recommendation 14) fails to protect core Koala Habitat, several Endangered Ecological Communities and significant threatened species habitat that occur in amongst existing residential areas. Their high conservation values deserve more protection than a Tree Preservation Order can provide. Again, Practice Note PN09-002 - Environmental Protection Zones applies.

Removing all protection for wildlife corridors mapped by the National Parks & Wildlife Service is a retrograde step that negates decades of science. Wildlife corridors should be included as an environmental overlay to ensure they are considered in planning decisions.

Core Koala habitat identified in a Koala Management Plan should be included in the E2 zone and not an environmental overlay. Decades of "consideration" have not assisted in halting the decline of koala populations and it is high time their identified core habitat is zoned for environmental protection. Similarly, shorebird roosting and nesting areas require the full protection of E2 zoning.

And finally I would like to support the Review's recommendation that all land designated for environmental protection should be given priority in the application of incentive-based mechanisms, including rate rebates, management assistance, financial incentives and local award schemes.

Regards


Andrew Murray