



Fingal Head Coastcare Inc.

**P.O. Box 21
Fingal Head 2487**

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Director Regions, Northern
Locked Bag 9022
Grafton NSW 2460

www.planning.nsw.gov.au/Plans-for-Your-Area/Regional-Plans/North-Coast/How-to-Get-Involved

Fingal Head Coastcare Inc's Submission on the Draft North Coast Regional Plan (DNCRP)

Dear Sir/Madam,

Fingal Head Coastcare welcomes the opportunity to comment on the *Draft North Coast Regional Plan* (DNCRP) and recognises the significant impacts that this plan will have on the environment and communities in the NSW North Coast.

About Us

Fingal Head Coastcare Inc. (FHC) is a voluntary, incorporated landcare group which has been operating continuously for 30 years revegetating 33 hectares of crown land on the Fingal Peninsula which includes littoral rainforests, coastal woodlands, wetlands, heathland, native grasslands, dunal and headland vegetation.

The areas we work in are of high environmental value especially the endangered ecological communities of Littoral Rainforests, Themeda Grasslands on Sea Cliffs and Coastal Headland, coastal wetlands and rare coastal heath so a number of areas of the DNCRP are of concern to us.

FHC are concerned that although the draft North Coast Regional Plan:

- Appears to identify areas of high environmental value (Figure 1: High Environmental Values, p 6-7) but it does not specify measures to protect them from inappropriate and unsustainable development nor include mechanisms to enforce protection measures.
- Suggests that sites highly likely to have significant environmental, aboriginal and historic heritage values need to be identified and considered in development proposals (page 20) but it does not identify when these will be mapped, when the maps will be available, or what local government can use until these maps are available.
- Recognises that the north coast contains fifteen World Heritage status reserves but does not ensure that these sites are protected in accordance with Commonwealth and International obligations.
- Has expanded the interpretation and extent of the sensitive coastal protection zone it has unfortunately indicated a number of development areas in the coastal zone which are not suitable for this fragile environment.

FHC has significant concerns that the NCRDP and other regional plans consider biodiversity

offsetting as a means of justifying development and destruction of areas of environmental and other significance. FHC believe is not a viable option and that biodiversity offsetting should not even be considered in sensitive areas eg. coastal catchments, endangered ecological communities or threatened species habitat. FHC consider that the existing NSW Biodiversity Offsetting Policy for Major Projects is not appropriate and any expansion of this policy is unacceptable.

FHC are concerned that the DNCRP does not:

- provide adequate protection of wildlife corridors which is a requirement of the current North Coast Regional Environmental Plan and should be included in the draft North Coast Regional Plan.
- recognise the importance of koala habitat in the North Coast region nor indicate how the current koala plans of management will be integrated into the draft Regional Plan.
- address the potential problems of conflicts in the land use areas identified eg. areas of high environmental and mineral resources but merely defers planning and impact management to a later stage.
- consider the changes to Coastal Protection Laws currently being considered by the NSW state government and continues to leave it to local councils to assess and plan for climate risks.
- adequately plan for climate change mitigation especially in relation to constraints to development in areas impacted adversely by climate change eg. floodplains, low lying coastal areas and high bushfire risk areas.
- Consider the north coast community's recent stand against coal seam gas exploration and extraction nor the assurance that has been given by the current government that these will be prohibited across the entire region.

Fingal Head Coastcare has concerns that this plan, like the existing planning controls may be overridden to suite development demands as has happened in a number of cases in the north coast recently and suggest that community and Local Land Services representatives should be included on the Coordinating and Monitoring Committee to minimise the chance of this.

Fingal Head Coastcare request that our recommendations are incorporated into the final North Coast Regional Development Plan and thank you once again for the opportunity to comment on this draft.

Submitted for Fingal Head Coastcare Inc. by

Kay Bolton

President