

**RESPONSE TO ISSUES PRESENTED AT THE  
18 NOVEMBER 2003 PUBLIC MEETING  
FOR  
DRAFT PACIFIC PALMS LOCAL ENVIRONMENTAL  
STUDY**

**NOVEMBER, 2003**

## ANALYSIS OF ADDITIONAL SUBMISSIONS TO THE DRAFT PACIFIC PALMS LOCAL ENVIRONMENTAL STUDY

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**ISSUES RAISED AT PUBLIC MEETING ON 18 NOVEMBER 2003**

Name(s) and Address of Respondent	Issues/Concerns/ Suggestions	Planning Comments
<p><b>1. R Baggs</b> (resident) – <b>Ampat PI, Blueys Beach</b> (Area 6)</p>	<p>i.) No inclusion of Bluey Beach precinct in LES pp 3-1 to 3-6 (<i>Drainage Investigations</i>) ii.) Drainage/flooding must be addressed prior to further development in this precinct</p>	<ul style="list-style-type: none"> <li>Current LES has been updated to include discussion of drainage issues affecting the South Blueys precinct.</li> </ul>
<p><b>2. Carl Dries</b> (Blueys Estate P/L) - <b>Lot 2 DP 867899 Boomerang Drive</b> (Area 8)</p>	<p><u>Lot 2 Boomerang Drive</u> i) Koala plot no. 7 in LES → cannot replicate plot (no. of trees supposedly identified) and hence data inaccurate for LES purposes;  ii) Requests same line of (Village) zoning as adjoining land to west;</p>	<ul style="list-style-type: none"> <li>Koala plot coordinates were not recorded with a GPS, and hence northing/easting figures should only be regarded as rough approximations. To avoid prolonged debate over location of koala plots and ensuing delays to LES, and to provide a transparent assessment that is consistent with current koala research, the findings of the recent draft recovery plan for the koala (NSW National Parks and Wildlife Service, 2003) have been utilised as a basis for the identification of koala habitat in the Pacific Palms area.</li> <li>This is generally consistent with the zoning proposed in current LES, except that far eastern corner of the site (ie. containing Swamp Mahogany/ Cabbage Tree Palm Swamp Forest) has been included in the proposed conservation precinct. <u>Reason:</u> the Swamp Mahogany/Cabbage Tree Palm Swamp Forest contains high habitat values and is extremely under represented in the Great Lakes Region (ie. thus has a high overall ecological value).</li> </ul>

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<p>3. R Wilshire – on behalf of Lot 12 DP 633645 (Area 7)</p>	<ul style="list-style-type: none"> <li>• Requests rezoning of Lot 12 to allow urban residential development;</li> </ul>	<ul style="list-style-type: none"> <li>• Only a 5000m<sup>2</sup> portion along Boomerang Drive is considered suitable for further residential subdivision, and this has been included in the proposed 2(a) zone.</li> <li>• Remainder of lot 12 is affected by slope, bushfire and/or ecological constraints and has been included in the proposed 7(a) zone.</li> </ul>

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<p>4. Degotardi Smith &amp; Ptrs – on behalf of:                      Lot 6 DP 811686,                      Redgum Road, Larget Pty Ltd                      Lot 4242 DP 1036056 (Area 1)</p>	<p><u>General Submission requests</u>                      i) That Council set the proposed residential zone edge as shown in Annexure E to submission, subject to confirmation by owners that LES environmental concerns and bushfire management issues can be adequately addressed;</p>	<p>The residential edge proposed (by the Consultant) would result in the loss of 9ha of regionally significant vegetation and threatened species' habitat (as compared to 2.5ha under the residential zonings recommended in the LES, a difference of 6.5ha), comprising:</p> <ul style="list-style-type: none"> <li>• 3.5ha of swamp mahogany/ paperbark,</li> <li>• 1.5ha of wet heath,</li> <li>• 2.2ha of blackbutt/smooth-barked apple forest, and</li> <li>• 1.8ha of paperbark forest.</li> </ul> <p>This significantly extends the urban footprint into <b>ecologically sensitive and flood liable</b> areas and represents a <b>40%</b> increase in area proposed to be rezoned for residential. It is also inconsistent with the aim of maintaining a compact settlement pattern.</p> <p>In <b>CONCLUSION</b>, if Council were to add an additional development area of this size to the LES a Species Impact Statement is likely to be required. In this regard, further consultation with government agencies (namely NPWS under s.34 of the <i>Environmental Planning &amp; Assessment Act</i>) would also be required.</p>



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<p><i>continued...</i></p> <p><b>Degotardi Smith &amp; Ptrs</b>                      – on behalf of:  <b>Lot 6 DP 811686,</b>  <b>Redgum Road, Larget</b>  <b>Pty Ltd</b></p> <p><b>Lot 4242 DP 1036056</b>                      (Area 1)</p>	<p>v) That the remainder of the non-residential zone should remain 1(c) so that future opportunities such as ecotourism are not locked up;</p>	<p>One of the principal aims of the Pacific Palms LES is to resolve the current '1(c) Future Urban Investigation Zone' with one or more zones that best reflects future land use opportunities/ constraints for these areas. This is essential if Council is to provide current and future land-owners, as well as the wider community, with a clear direction on the future settlement pattern for the study area. After 20+ years and at least 8 specialist studies, the constraints to future development in the study area are clearly documented. It is now time for Council to apply the LES findings accordingly.</p>
<p><b>5. Doug Sneddon</b>  <b>Planning P/L,</b>  <b>Lot 2 DP 862876 –</b>  <b>(Area 9)</b></p> <p>→ LES Investigation Area #9</p>	<p><u>Additional issues to public submission</u></p> <ul style="list-style-type: none"> <li>➢ Submitted a revised development concept plan for up to 28 dwellings and an environmental corridor of variable width (50-110 metres) along the eastern property boundary.</li> <li>➢ Requests that Council favourably consider early preparation of a draft LEP to rezone major part of the land to 2(a) (Low Density Residential) and part 7(a) (Environmental Protection) in accordance with draft zoning plan submitted by respondent.</li> </ul>	<p><b>Note:</b> future opportunities such as eco-tourism within this site (Area 1) are NOT extinguished in any way by the proposed LES zonings.</p> <p>Revised concept plan is consistent with the overall strategic findings of the draft LES and enhances the site's potential to provide a critical corridor link in the south of the study area.</p> <p>Noted. Revised concept plan is consistent with the overall strategic findings of the draft LES and enhances the site's potential to provide a critical corridor link in the south of the study area. If the LES cannot be adopted for the entire study area, there may be strong grounds for preparing a separate site-specific LEP for Area 9 and other lands which are not disputed.</p>

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<p>6. Manidas Roberts / James Coleman / McGlashan &amp; Crisp/ Biosphere Environ. I Consultants, - Lot 58 DP 731369, Karnang Drive (Area 2)</p>	<p><u>Generally</u> Supports thrust of LES that natural environment must be responsibly managed, but states that the urban environment has been neglected in favour of native habitats and a biased conservation philosophy.</p> <p><u>Specific concerns:</u></p> <p>i) Future of Boomerang Beach area due to lack of a clear boundary between residential and bushland areas.</p>	<p>Rather than reflecting a “biased conservation philosophy” (or any ideological bias), the LES is guided by the legislative planning and environmental framework outlined in Chapter 1, namely the <i>Hunter Coastal Urban Settlement Strategy, Environmental Planning and Assessment Act, Threatened Species Conservation Act</i> and <i>NSW Coastal Policy</i>. The principles of ESD underlie this framework.</p> <p>The importance of creating a clearly defined urban edge is recognised in the <i>NSW Coastal Design Guidelines</i> as a way of limiting impacts on the surrounding environment. It is also seen as necessary to ensure settlements do not sprawl and spread over time. However Pacific Palms falls under the category of “coastal village” in the <i>Guidelines</i> (pop. &lt; 3000), which tend to be dominated by ecological systems of high integrity. <u>Importantly</u> the boundaries between developed and natural areas within “coastal villages” are characteristically indistinct, with the <i>Guidelines</i> recommending that future development retain the blurred boundaries between natural and built environments.</p> <p>Nowhere in the <i>Guidelines</i> is there an objective to expand urban settlements into ecologically sensitive areas for the principal purpose of creating a clear physical urban edge, particularly where the result is <b>ribbon development</b>. Rather the <i>Guidelines</i> (like the <i>NSW Coastal Policy</i>) are based on the principles of Ecologically Sustainable Development (ESD), of which biodiversity conservation is the cornerstone. The LES must therefore ensure its recommendations are consistent with and reflect the principles of ESD as they apply to the study area.</p>

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<p>continued...</p> <p><b>Lot 58 DP 731369,</b> Karnang Drive (Area 2)</p>	<p>(i) continued....</p>	<p>With respect to <i>defining the urban footprint/</i> boundary, the options of 'No or Limited Development' and/or 'Maintaining a Compact Settlement Footprint' (p45, <i>Guidelines</i>) are most applicable to the study area. The first scenario applies to villages where middle- to large-scale development would irrevocably compromise the natural environmental and change the existing character of the settlement. The second scenario typically involves a settlement where there is demand for growth, however, there are also strong natural/cultural constraints limiting the expansion of the urban footprint.</p> <p>In terms of <i>locational considerations</i>, the <i>Guidelines</i> recommend against locating development on lands supporting habitat of threatened, rare or regionally significant flora and fauna species and endangered ecological communities, including koala habitat. As with the LES approach to all potential development areas, the planning objective for Area 2 is to reinforce the existing settlement character by locating development sensitively in response to the surrounding ecological and urban characteristics of this area.</p> <p>In terms of <i>desired future character</i>, the approach recommended in the <i>Guidelines</i> is to reinforce scenic and tourist values of coastal villages by maintaining the distinctive way in which the settlement sits within the landscape. Indeed the <i>Guidelines</i> cite the (i) protection of the natural environment and (ii) retention of village character as key priorities for coastal villages, which is consistent with the views also expressed at the Pacific Palms public workshop in September 2001.</p>

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<p>continued...</p> <p><b>Lot 58 DP 731369,</b> Karnang Drive (Area 2)</p>	<p>(i) continued....</p>	<p>The <i>Guidelines</i> also encourage new subdivision where it is an extension of the block, street and lot pattern of existing settlements. The respondent's concept does not build upon the existing lot pattern, but instead results in awkward protrusion into the natural landscape (ie. swamp forest/ heath land). Whilst this concept might create a more continuous urbanised boundary and a more permeable road network, it significantly expands the urban footprint into ecologically sensitive and flood liable areas and is inconsistent with maintaining a compact settlement pattern.</p> <p>In addition to the "edge-effect" impacts that would extend beyond the proposed urban footprint, all drainage from proposed development would discharge into the SEPP 14 wetland to the west. For these reasons it is considered that the developable portion of Karnang Drive recommended in the LES represents both a responsible and logical urban edge for this precinct.</p> <p>Finally, the concept of a <i>permeable road network</i> in the study area (ie. linking up Karnang Drive with residential streets south of the playing fields) is mainly relevant in the context of providing access to facilities, shops or the beach (<i>NSW Coastal Design Guidelines</i>, p66). The proposed concept achieves none of the above; rather it links up two quiet residential streets to Karnang Drive via a proposed access road west of the playing fields. As no community facilities or shops are proposed along Karnang Drive the linking of these streets as an end in itself is not justified.</p>

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<p><i>continued...</i></p> <p><b>Lot 58 DP 731369,</b> Karnang Drive (Area 2)</p>	<p>(i) <i>continued...</i></p>	<p>IN CONCLUSION, the key concern with the respondent's proposal is its excessive scale of vegetation clearance (5.3ha — 2.8ha along Karnang Drive / 2.5ha west and south of the playing fields) and associated impacts on regionally significant vegetation communities, ecological function and threatened species habitats. Contrary to the respondent's suggestion that this concept would facilitate more effective land management, much of the development concept would create detrimental 'ribbon development'. Considering the implications of fire trails, asset protection zones and the unauthorised use of land behind allotments by residents that commonly results from designs of this nature, the true ecological footprint of this design would be significant. Whilst development under community titles is strongly supported, increasing the development envelope is acceptable only where it can be clustered into a defined (and unconstrained) area, thus minimising both ecological footprint and related edge-effects. In the case of Lot 58, the southeast corner forms the realistic extent of development if the isolated wallum froglet population is to be conserved in the locality.</p> <p>If Council were to add an additional development area of this size (as suggested by the proponent), a Species Impact Statement is likely to be required. In this regard, further consultation with government agencies (namely NPWS under s.34 of the <i>Environmental Planning &amp; Assessment Act</i>) would also be required.</p>

Name(s) and Address of Respondent	Issues/Concerns/ Suggestions	Planning Comments
<p><i>continued...</i></p> <p><b>Lot 58 DP 731369,</b> Karnang Drive (Area 2)</p>	<p>ii) No incentive for owners to undertake sensitively designed low key projects based on conservation principles.</p>	<p>This is based on the premise that increased development yield will allow more sites to contribute financially to the maintenance of the conservation areas. This is a relevant consideration if the cost of maintaining surrounding conservation areas is likely to be high relative to the number of potential landowners. However the largely undisturbed condition of the surrounding swamp forest means this area is essentially self-maintaining and does not require ongoing intensive management. In the case of Lot 58, future land management would be generally limited to weed control along the urban fringe of the wet heath and an appropriate fire management regime. The latter would be guided by a Fire Management Plan for the study area, which would probably take the form of small mosaic burns in select areas every 7 or more years. Such a regime would maintain the core habitat values of the wet heath for both the wallum froglet and eastern chestnut mouse. The ongoing costs of managing the heathland vegetation in this manner would not be high if spread among 5 or more property owners. These costs are even lower where a permanent conservation agreement has been entered into and corresponding tax write-offs and/or rate relief are spread among the owners.</p> <p>The issue of landowner incentives is further discussed on <b>page 100</b> of the Public Submission Analysis (23/9/03 Ord Meeting). Importantly limited subdivision under community titles should largely address ecological management issues for this site. If the landowner is concerned that surrounding ecological areas within this site cannot be viably managed at the scale of development proposed in the LES, there are also strong tax incentives for donating these areas to a registered trust (which takes on the future management responsibilities!). The tax concessions would be significant given the current value of the land to be donated.</p>

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<p><i>continued...</i></p> <p><b>Lot 58 DP 731369,</b> Karnang Drive (Area 2)</p>	<p>iii) Current development pattern at Boomerang Beach is haphazard; Council has opportunity to put in place a structure plan that will remove uncertainty for this area, ensure conservation objectives are achieved and provide incentive for well-designed urban development on a limited scale.</p> <p>iv) LEP has statutory obligation to embrace social, economic and environmental factors and achieve “triple bottom line”; LES is seriously biased as Council has not achieved this obligatory balance.</p> <p>v) Landowner requests low density zoning of some 6ha out of the 200ha within study area that is proposed for conservation; seeks opportunity to demonstrate that low density development can be undertaken in an environmentally responsible way.</p> <p>(Hill, R. 2000. <i>Achieving the Triple-Bottom Line</i> - address by the Federal Minister for Environment and Heritage to the John Stuart Mill Society, Adelaide, June 13, 2000)</p>	<p>The uncertainty regarding Area 2 and the majority of the study area is primarily a consequence of the current ‘1(c) Future Investigation Zone’. The replacement of this zone with more clearly defined residential/environmental protection zones will remove this uncertainty. Combined with tax and/or rate incentives (p100 of Public Submission Analysis), limited development and conservation outcomes can <u>both</u> be achieved.</p> <p>The term “triple bottom line” (TBL) refers to the social, economic and environmental impacts of <u>operational activities</u> undertaken by private companies and public sector organisations. Within this context, true sustainable development demands that an enterprise be financially profitable, must minimise or eliminate its negative impacts on the environment, and must conform with the expectations of the society it serves (Hill, 2000). Applying this criteria to Lot 58, the area recommended for development in the LES:</p> <p>(i) is of sufficient scale to be financially profitable to the landowner; (ii) minimises negative impacts on the regionally significant wet heath and related threatened species habitat; and (iii) conforms with the community’s expectations as documented in Chapter 10 of the Study. It is therefore consistent with TBL criteria.</p> <p>Ecologically Sustainable Development (ESD) is now widely recognised as a key component of mainstream planning practice, and the principle of biodiversity conservation now underpins the ESD framework at all scales — local, national and global. Accordingly, <i>balanced</i> in the context of <b>ESD planning</b> is largely determined by the ecological attributes of each site and the surrounding locality. Hence it is the ecological</p>

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<p><i>continued...</i></p> <p><b>Lot 58 DP 731369,</b> Karnang Drive (Area 2)</p>	<p>iv) &amp; v) <i>continued...</i></p>	<p>sensitivity of Lot 58, which contains some of the highest habitat values and diversity in the study area, that chiefly governs the nature and extent of future development opportunities within this site. In this regard a balanced planning outcome is one that maintains or enhances the site's environmental qualities while providing tangible social and economic benefits. It is irrelevant that some additional 200ha are proposed for conservation in the study area, as much of this comprises distinctly different forest types that cater for a different suite of species. In actual fact, the development concept proposed by the landowner would result in the loss of 6"ha of known habitat for a range of threatened fauna in the study area, including both primary and secondary koala habitat. Pursuing this option would not only result in an "unbalanced" outcome for the study area but would be clearly inconsistent with the planning and environmental framework outlined in Chapter 1 of the LES.</p> <p><u>Conclusion</u> For the reasons discussed above, the southeastern portion of Lot 58 proposed for limited residential development (refer to Fig. 15.1b) is considered to be the realistic extent of future development within this site.</p>
<p><b>7. Miriam Jones – on behalf of Karnang land</b> (Area 2)</p>	<p>i) Intention for land is to promote care of the environment and community instead of treating as "no mans land" or a vacant lot.</p>	<p>While this comment is accepted, it is important to recognise that LES proposes to rezone the southeastern portion along Karnang Drive for residential development. At minimum this should yield 5-7 allotments under community titles, which is sufficient to address future management of the adjoining conservation precinct within Lot 58.</p>

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<p><b>Miriam Jones – on behalf of Karnang land (Area 2)</b></p>	<p>ii) Keen to see family support facilities provided near the school and beach area.</p>	<p>Although the respondent has not identified the type(s) of family support facilities desired, a 1999 survey of the Pacific Palms community found that a community health centre, a youth centre, adult education programs, a senior citizens centre, a neighbourhood centre and Meals on Wheels were desired. The LES determined that the majority of these support facilities could be provided from within the existing community centre on the Lakes Way.</p> <p>It should also be recognised that the study area's ability to attract families in the future is severely hampered by the high cost of property (and rents) in relation to the surrounding villages and nearby regional centre of Foster/Tuncurry. This affordability problem is amplified by current tax incentives that favour investment property demand over genuine housing needs (eg young families). Combined with low interest rates and greater purchasing power from the Sydney region, the currently high ratio of holiday/ permanent accommodation in the study area is likely to persist well into the future. In the case of Lot 58, the potential for families to permanently reside in this area ranges at best from 'very low' to 'nil'. As such there are insufficient social planning grounds to re-locate family support facilities (including accommodation) within this area.</p>

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<p><b>8. A W Webster - Lot 19 Hillside Parade</b> (Submission No. 3 in Sept 2003 public submission analysis)</p>	<p><u>Specific concerns with LES findings:</u></p> <ul style="list-style-type: none"> <li>i) Sterilisation of land without:                             <ul style="list-style-type: none"> <li>• compensation;</li> </ul> </li> <li>• adequate research; and</li> <li>• proper application of SEPP 44 requirements to the LES; no credible evidence of a koala population to protect on or near the land;</li> </ul>	<p>The EP&amp; A Act does not provide for compensation when rezoning land to a more restrictive landuse zone. The concept of conservation is changing, and is not necessarily seen as a 'benefit' but as 'prevention of harm'. In this instance, the landowner might be justified in requesting assistance for management of the land, but cannot claim compensation for the apparent loss of rights that did not exist in the first instance.</p> <p>Research (including site investigations) of the vegetation and habit values of the subject land is sufficient to confirm that the entire holding (Lot 19) is of HIGH overall ecological value, comprises primary and/or secondary koala habitat and contains locally and/or sub-regionally significant vegetation communities. As such the entire site is identified as having a HIGH overall development constraint.</p> <p>A "site-specific" SEPP 44 koala assessment (ie. for D.A. purposes) and a larger SEPP 44 koala assessment (ie. for LES purposes) are conducted quite differently. A site-specific SEPP 44 assessment examines potential koala habitat and if not present does not proceed to the next stage. A larger SEPP 44 assessment does not require a potential koala habitat assessment to be prepared pursuant to the SEPP prior to the identification of core koala habitat. Rather a larger SEPP 44 assessment examines the utilisation of vegetation communities to determine primary and secondary food resources for the koala in the area and identifies known locations of koalas. Interpretation of the results is then applied to determine the most likely areas that the local koala population(s) would be <u>reliant</u> upon for long-term survival.</p>

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<p><b>A W Webster</b> - Lot 19 Hillside Parade</p>	<p>i) <i>continued</i> .....</p> <p>NPWS (2003). <i>Draft Recovery Plan for the Koala</i>. New South Wales National Parks and Wildlife Service, Hurstville, NSW.</p> <p>ii) LES has not adequately addressed social or economic issues affecting study area;</p>	<p>This is what was conducted in the Pacific Palms study area, with scat data used to identify primary and secondary food resources for the koala. This data was subsequently used to identify areas that contained primary food trees on which the local population would be dependant (i.e. swamp mahogany and tallowwood). The subject land has been identified as containing vegetation which contained a primary food tree (Swamp Mahogany) and therefore, most likely important for the long-term survival of the local koala population.</p> <p>To avoid confusion over the terminology used in SEPP 44, the current draft LES has been updated to replace all references of “core” koala habitat with “primary” koala habitat. In addition, the assessment methodology has been revised to utilise the <i>NSW Draft Koala Recovery Plan (2003)</i> as a basis for the identification of potential koala habitat in the Pacific Palms area (as definitions provided in SEPP 44 are inadequate for determining koala habitat).</p> <p>Chapter 12 considers the changing demographics of the locality along with needs/opportunities for retail and community facilities. From a social and economic standpoint, the long term viability of the study area is strongly linked to its unique coastal village setting and protection of the area’s natural assets. This accords with the results of the community workshop held in 2001, which identified the 3 most important issues affecting the study area as:</p> <ul style="list-style-type: none"> <li>➢ Environmental protection/flora &amp; fauna;</li> <li>➢ Retention of coastal village atmosphere; and</li> <li>➢ Drainage/water quality.</li> </ul>

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<p>A W Webster - Lot 19 Hillside Parade</p>	<p>iii) Whole basis of LES predicated on myth that this land is core koala habitat;</p> <p>iv) Objects to findings on basis of no critical evidence that there is a koala population on or near the land to protect;</p> <p>v) NPWS Atlas sightings can be mislocated by any distance from 100m up to 10km — therefore misleading and should not be relied on;</p>	<p>This statement is erroneous as “koala habitat” was not even included in the criteria applied to determine <i>overall ecological values</i> (EcoPro, 2003 – Chp 4) or <i>overall development constraints</i> (Chp 9) in the study area. Hence koala habitat is not the principal determinant of proposed conservation precincts.</p> <p>The vegetation types within this site are known koala feed tree species, with Swamp Mahogany being the primary feed tree. There is widespread scientific acceptance that areas which support koala habitat, but do not currently support koalas, are critically important for future recovery of the species by providing habitat into which increasing populations can disperse.</p> <p>By definition, <b>endangered species are also short on time</b>, and it goes against <b>sustainable planning practice</b> to reduce their known habitat just because that species has not been recorded on a particular site.</p> <p>This statement is incorrect as the <b>maximum</b> error for NPWS Atlas data provided to registered ecological consultants is only <b>100m</b>, NOT 10km as suggested. However NPWS Atlas data provided to the <b>general public</b> is accurate only up to <b>1km<sup>2</sup></b>, which is done intentionally for habitat protection reasons.</p>

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<p><b>A W Webster</b> - Lot 19  Hillside Parade/ <b>G Walter</b>  (Calmjoy Pty Ltd)/ <b>G Wells</b></p>	<p>vi) Disputes research undertaken by EcoPro on basis that trees listed in koala survey plots cannot be ground-true; thus requests that Principal of EcoPro provide full documentation to confirm results of site inspections and where disputed, to revisit each property concerned;</p>	<p>The updated EcoPro assessment (2003, [pij]) states that <i>“opinions expressed in the report are the professional, objective opinions of the author and are not specifically intended to advocate any particular proposal or pre-determined position.”</i> EcoPro advises that the work undertaken is sufficiently accurate to be relied upon for LES purposes.</p> <p>Notwithstanding this, it has become apparent the definitions provided in SEPP 44 are inadequate for purposes of classifying koala habitat. To avoid unconstructive debate over the validity of scat counts, plot locations and tree identification associated with the Consultant’s work, and to provide a transparent assessment that is consistent with current koala research, the findings of the recent draft recovery plan for the koala (NSW National Parks and Wildlife Service, 2003) have been utilised as a basis for the identification of koala habitat in the Pacific Palms area.</p> <p>If Council does not accept the current koala habitat assessment by EcoPro, then its most practical option is to fund the cost of an “independent” koala expert to re-assess koala habitat values throughout the study area.</p>

Name(s) and Address of Respondent	Issues/Concerns/ Suggestions	Planning Comments
<p><b>A W Webster</b> - Lot 19 Hillside Parade</p>	<p>vii) Proposes that eastern third of Lot 19 Hillside Pde should be zoned for residential development, consistent with NPWS suggestions (Submission dated 7/4/03) for adjoining lands to north and east; Believes this creates a logical residential infill to the centre of the current Elizabeth Beach Village;</p> <p>viii) Residential development as proposed would allow stormwater run-off to be properly drained into Elizabeth Creek;</p> <p>ix) Method of presenting public submissions to Council (ie. summary analysis) lacks procedural fairness as all original submissions should be made available to Councillors for review;</p>	<p>The eastern portion of this site contains dense swamp forest characterised by high water tables (ie. flood prone), high bushfire hazard and known or likely habitat for 15 threatened species. The Swamp Mahogany/Cabbage Tree Palm Swamp Forest is also extremely under represented (both locally and sub-regionally) in the Great Lakes LGA. Given the severity of constraints affecting this site (see LES Chapter 9), the only part of Lot 19 potentially suitable for a dwelling entitlement is the area fronting Hillside Parade within the current '2 Village' zone.</p> <p>Noted. However future modifications to the current stormwater management regime must be in accordance with a catchment-wide drainage strategy.</p> <p>Format of submission analysis (presented to councillors on 23/9/03) is commonly used to identify key issues in a concise and orderly manner. This follows a directive to planning staff to limit the amount of annexured material in business reports to essential items <u>only</u>, although councillors (as well as general public) can still view individual submissions upon request. This practice minimises the amount of non-essential reading material and paper consumption for council meetings. Nevertheless, any respondent wishing to distribute their original submission to all councillors should insert 'cc: all councillors' at the end of their submission.</p>

