



CLARENCE ENVIRONMENT CENTRE Inc

29-31 Skinner Street

South Grafton 2460

Phone/ Fax: 02 6643 1863

Web site: www.cec.org.au

E-mail: admin@cec.org.au

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Planning Proposal: to rezone part of the Grafton Golf Course for smaller lot subdivision

This land in question has undergone a few zone changes under the Clarence Environment Local Environment Plan, to its current status: *viz*

Pre-1988 - 6(b) Open Space (Recreation, Special Purpose), ie golf course

Aug 2011 - 1(c) Rural Residential

Dec 2011 - R5 Large Lot Residential (ie 9 residential blocks)

We understand that residents to be affected by the proposed change to land zone status R5 were virtually unanimous in their acceptance of the large lot plan, since it is in keeping with lots adjacent to the golf course. That amendment was subsequently adopted and incorporated into the South Grafton Heights Precinct Strategy.

However the Grafton District Golf Club, in association with developers A Fletcher & Associates Pty Ltd, is again seeking a further amended rezoning of the land, to increase its subdivision potential from 9 residential plots to 16.

One of the arguments used to support the application for this greater subdivision plot rezoning is the cost of maintaining the golf course and its facilities. While we understand the argument and sympathise with the golf club owners-managers in light of increasing costs to everyone for all everyday expenses, it is the CEC's job to also present a voice for the wildlife that inhabits the golf course's peaceful natural surrounds.

As WIRES koala coordinator for over a decade, responsible for keeping official records of all koalas called into the WIRES Clarence Valley branch, I appreciate the opportunity to make the following comments and observations, which I hope might help to bring a satisfactory solution for all concerned.

It is noteworthy that a 2005 fauna assessment survey of the Grafton Golf Course (Janet Purcell BSc, Dip URP; Russell Jago Assoc Dip Applied Sc) failed to identify koalas in this vicinity. In this confined survey site this could only mean there weren't any koalas there. Today there is a small, relatively stable population of koalas inhabiting the South Grafton suburbs, with their home territory based around the still treed, secure environment of the golf course and the large residential blocks surrounding it. By records of koalas collected from the broader South Grafton area, it is highly likely these koalas are arriving from Rushforth Road; Reservoir hill, Watters Road and Tintenbar Road areas, where koalas are now a permanent feature by dispersal from Waterview Heights and further afield from Ramornie (**Appendix 1**). It is notable that up and down the east coast the most significant koala populations are now forming as urban populations, where residents look out for them and the animals are safe from fire.

South Grafton is a restricted environment for koalas, which occasionally find their way into resident's yards and unsuitable places, possibly through being pushed out by the more dominant animals defending a very limited territory and food supply. However the majority have been healthy and clearly coping well to that point, so were unable to be trapped and relocated. The sole support for their survival in such a restricted territory are the established Forest red gum (*Eucalyptus tereticornis*) and Grey box (*Eucalyptus moluccana*) trees remaining around the golf course; in small parks; as sparse corridors in undeveloped moist gullies and swales, and dotted around suburban gardens (**Appendix 2 SG locations map**).

While admittedly koalas have not as yet been recorded on any part of the land proposed to be rezoned for subdivision from the golf course, both WIRES' records and records from local residents clearly show the golf course and vicinity to be an important hub for koalas. This includes a very recent photograph of mating koalas on 6 Winwood Lane, bordering the golf course (**Appendix 3, records and photographs**).

A few of the more recent calls have regrettably not yet been submitted to the BioNet wildlife Atlas, however the dates and photographs are referenced for ease of verification (**Appendix 4, full record sheet of South Grafton koalas, including town outskirts**).

In this case I disagree with the statement in Appendix D of the Assessment Against State Environmental Planning Policies, which determines that SEPP44 is not relevant for the golf course subdivision, and no Koala Management Plan is required.

I also disagree with Fletcher & Associates' finding that the rezoning will have no significant impact (on koalas), and with the statement that the Planning Proposal is a Low Impact Planning Proposal, consistent with surrounding land use zones and land uses. I question these findings for the following reasons -

- **Two Aims of the 2011 LEP** are -

1.2(d) - to protect areas of high ecological, scientific, cultural or aesthetic value, and

1.2(k) - to maintain or improve the natural conservation and scenic amenity values of the land, including significant habitat areas and wildlife corridors

- **The South Grafton Heights Precinct Strategy (SGHPS / B4)** requires that natural habitat should be enhanced and incorporated into corridors that allow for multiple uses.

- **The CVC Biodiversity Management Strategy** is managed under the principle of Net Vegetation Gain, which cites (iii) no reduction in viability of priority habitat values or corridor function

It therefore appears to us that this proposal in its more recent form is not in keeping with the 2011 LEP, nor with the SGHPS, nor with the CVC Biodiversity Management Strategy 2010. There has been no time to consider all documents relevant to this case, but it is specifically noted that all councilors were in favour of the adoption of rezoning to R5 to this portion of land. It's a great shame that those responsible for managing our lives and lifestyles are so easily swayed by development in its more obvious bricks and mortar form, without exploring alternatives.

The South Grafton golf course and its surrounding landscape belongs within these purportedly protected areas mentioned above, more so than any land within the South Grafton precincts. While we contest the old out-dated SEPP44 and welcome its review, recorded mating of koala around the Winwood Drive locality (see emails Appendix 3), directly adjoining the golf course and in close proximity to the proposed subdivision, does make the golf course core koala habitat. In particular the significant koala food trees in this area are the Forest red gums (*Eucalyptus tereticornis*) and Grey box (*Eucalyptus moluccana*), which occur in good numbers around the site. Tallowwoods (*E microcorys*) are also present along the Bent Street road verges, and while more than likely hand-planted (introduced), they are a listed favoured food species for koala on the north coast, and clearly provide a source of food as well as corridor access to the South Grafton suburbs.

Koalas in particular are under particular scrutiny right now, by all levels of government - in the review of the State Environment Planning Policy 44 (Koala Habitat); the plan to honour the many Actions under the Koala Recovery Plan through the NSW Koala Strategy (in prep), and the many millions of dollars to be released to enact the Save Our Species Iconic Koala program.

With koalas being a distinct identified high-profile ecological feature of the locality, both at and within immediate proximity of the golf course, their presence calls for a minimal removal of any native trees, as well as particular consideration by the Clarence Valley Council. Many South Grafton residents are aware of their local koala population and would hate to see them disappear again. It can only be hoped now that the Clarence Valley Council hold the same view.

For this alone we support the push by residents to retain the zoning status of the land under review at R5 Large Lot Residential, to suit affected residents as well as to protect and ensure the safety of the South Grafton koala population.

We also suggest there needs to be a strong focus on corridor retention and re-enhancement for this area. In which case we urge Council to also consider incorporating the following conditions on any subdivision of this property

- That it be a totally cat and dog-free zone, in perpetuity and enforceable, to protect the koala population

- That residential fences be koala friendly, to enable easy movement across the new urban landscape
- That the Tallowood trees along Bent Street be exempt from the subdivision and protected as koala food and corridor habitat, and as a buffer to residents to preserve their familiar view in a changed landscape
- That house designs fit in with the natural environment, and the larger properties allow for a portion away from the houses to be planted with native vegetation, to increase the wildlife corridor
- That planting of *Eucalyptus tereticornis* and *Eucalyptus moluccana* be carried out in areas of recreational and council land to provide further habitat and future food resources for koala in light of a heating climate
- That the golf course owners be encouraged to apply for funding under the SOS program to expand this valuable property to include a koala refuge/tourist park, for enjoyment of all visitors and residents, and to help defray some of the costs of managing a local golf club.

Again I appreciate the chance to respond to this Development proposal, and hope some of the suggestions made might strike a chord and be of use, to all parties concerned.

Patricia Edwards

President CEC; WIRES koala coordinator; WIRES Threatened Species Recording Officer