Byron Residents' Group – WEST BYRON DCP backgrounder

***Please do not just just copy this document as Council bundles all pro-forma submissions as one. Try and use what is here to make your own submission, however simple it is so important!

This DCP puts the cart before the horse. So much needs to be done before decisions are made how the site is planned, eg:
- **Biodiversity Conservation Management Plan**
- **Koala Plan of Management**
- **Water management plan**
- **Acid Sulfate Soils Management Plan**
- **Staging of the development timed to infrastructure requirements, ie traffic, sewage capacity**
- **Baseline studies of the health of the Belongil estuary – ie how much more can it handle? is it suitable for recreation? etc**

Shaky basis for a DCP
- The DCP specifies a list of underlined developers' studies that form the baseline information for the development of the site – many are already 5 or more years old – see pages 11 and 12 of DCP.
- These studies are the same as those that formed the basis of the developers' proposal and thus informed the Minister's decision to rezone the site – eg the koala study, acid sulfate soil study. Both were criticised by the Office of Environment and Heritage as inadequate.
- Many are fundamentally flawed and should not be used to further compound the damage we anticipate will come from this development.
- What we need up front are the required studies on Koalas, Acid Sulfate Soils, groundwater, the Belongil estuary and traffic before this goes any further
- As consent authority, Council needs to ensure it makes decisions based on current information and give it due consideration.

Staging
- There are no specifications about staging – there are no limitations on how much development they do at any stage.
- the identified stages are too big
- there is no time limit between stages
- no identified triggers to determine the staging of development eg:
  - traffic volume increases,
  - Sewage Treatment Plant capacity uptake
  - acceptable impacts on the Belongil
  - koala use of compensatory habitat

Traffic
A traffic study should be required to be prepared for the maximum development potential of the whole site that identifies:
  - The number of external traffic movements (vehicles per day, vph at peak hours, vpd at peak season) that will be generated on Ewingsdale Road and into town at each stage of the development
- The capacity of the roads to accommodate the traffic and the impact this will have on Level of Service
- Road upgrades that will be required for each stage of the development
- There should be a guarantee built in that there will be no loss of Level of Service on the roads into town – ie how long traffic backs up, carrying capacity of the road etc.

Acid Sulfate Soils
- The DCP requires an Acid Sulfate Soil Management Plan but they are planning the site BEFORE it is done.
- Issues of drainage, excavation and water management should not be dealt with by the DCP until AFTER an ASS Management Plan is done AND we have baseline data on the health of the Belongil

Koala Plan of Management
We can't plan the site before we determine what is needed for Koalas to survive. The features that will assist their survival must be planned in at this stage – not when it's too late.

The DCP currently has roads going through koala habitat, taking out quite a few feed trees and the drain through the site also takes up a large area of habitat.
A KPoM is needed to identify:
- core Koala habitat
- development buffers
- movement corridors

A KPoM must also put in place mitigation measures around issues such as:
- fencing,
- traffic calming,
- swimming pools, and
- dogs – for inclusion in the DCP.

Threatened frogs
The DCP has roads going through wetlands where the Wallum sedge frog and wallum froglet are found – both are threatened species. The developers said they would protect the frogs in their proposal but DCP says that the developer will be required to assess the frogs later – once a road is built through their habitat what will be left to assess? The frogs must be protected and a plan for their recovery put in place now.

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