

Statement of Environmental Effects

Accompanying a development application for

Farm Forestry

At

Lot 86/DP753169

517 Main Creek Road, Main Creek

23 April 2024

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1. Introduction

This Statement of Environmental Effects has been prepared by Forest Landscape Services to accompany a development application for [Farm Forestry](#) at 517 Main Creek Road, Main Creek. The application is being lodged by Nicholas Cameron, pursuant to Clause 4.12 of the Environmental Planning and Assessment Act 1979.

The proposal has been designed to achieve the relevant provisions of Dungog LEP, and Clause 4.15 of the Environmental Planning and Assessment Act 1979 (as amended).

The proposal is to conduct selective timber harvesting, roading, burning and pest and weed control within the native regrowth forests on the 89-hectare property that is zoned RU1.

This statement has been prepared having regard to the following documentation:

- A Flora and Fauna Assessment Report which includes a Biodiversity Test of Significance prepared by [Birdwing Ecological Services](#)
- Plan of Management to Minimise Adverse Impacts on Amenity
- [Managing Forest Fire and Bushfire Guideline](#)
- A Plan of Forest Management approved by Local Land Services (LLS)
- A Forest Stewardship Plan which has been funded under an LLS [Forest Stewardship Pilot Program](#).
- The [Private Native Forestry Code of Practice for Northern NSW](#).

2. Site description and analysis

2.1. Location and property description

The property comprises 89 hectares of land zoned RU1 located on the eastern fall of the Killarney range approximately 10km north-northeast of Dungog within the Dungog LGA (Figure 1).

The property is legally accessed from Main Creek Road via a registered right of carriageway. Secondary legal access is available along Killarney Fire Trail which traverses the property's western boundary.

Private property access roads linking to internal property roads also exists through Lot 5 to the south and Lot 81 to the north.

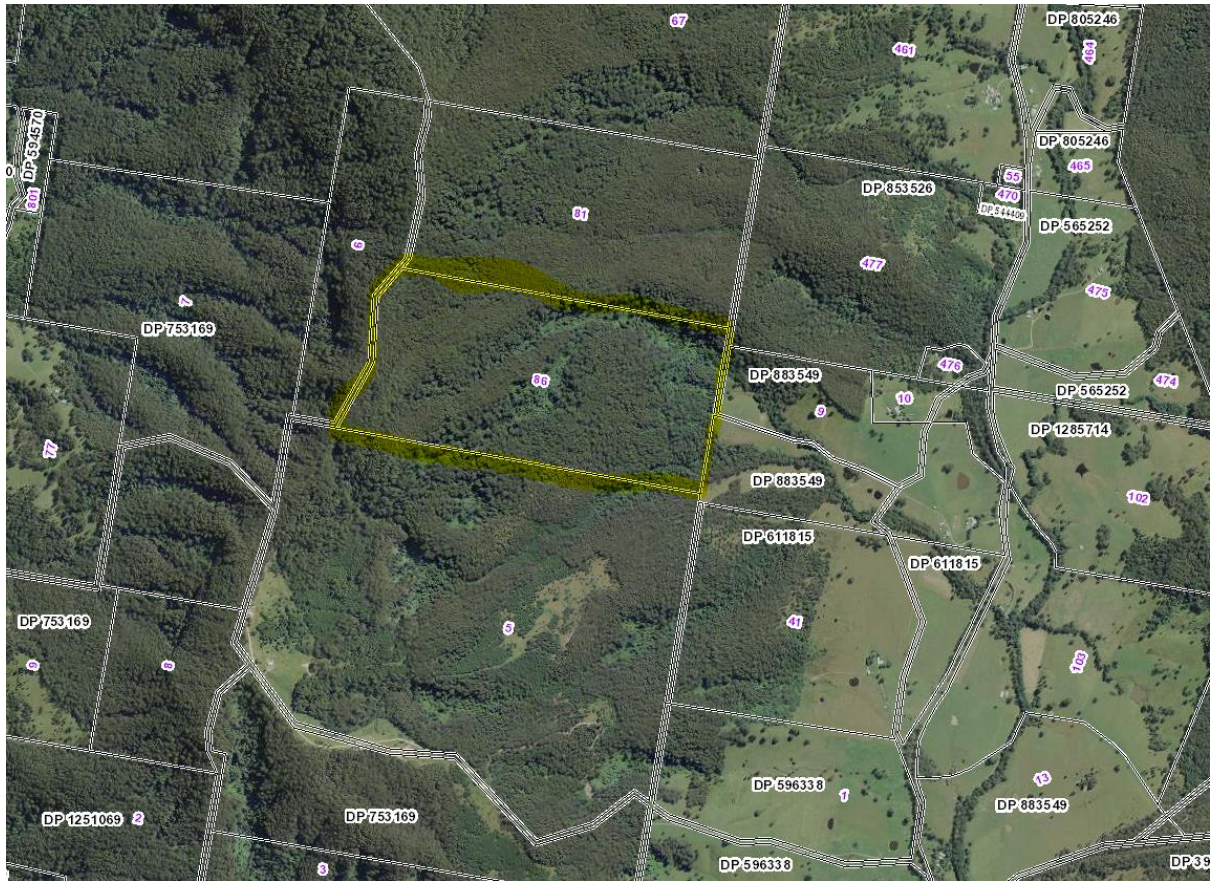


Figure 1 – Location on property showing access from the east

2.2. Site characteristics

The lot is predominantly forested and approximates a rectangle in shape, being 650 metres wide and 1.3 kilometres in length with the long boundary roughly aligned east-west. The property boundary was originally fenced but only remnants of the fence remain.

Elevation ranges from 160 metres ASL on the eastern boundary to 460m ASL on the western boundary. The property's western boundary adjoins Killarney Nature Reserve and roughly follows the watershed which divides Carowiry Creek catchment and the Williams River catchment.

The property ranges from gentle to steeply sloping with an east-south-east aspect. Slopes are punctuated by level shelves and rocky escarpments. The terrain in the upper western third of the property is mostly gently sloping and accessible. The terrain in the middle third of the property is more variable and includes a deeply incised drainage line, a narrow ridge, a rocky escarpment, and a shelf. The terrain in the lower eastern third of the property is more consistent, dominated by spurs and gullies which are moderate to steeply sloping.

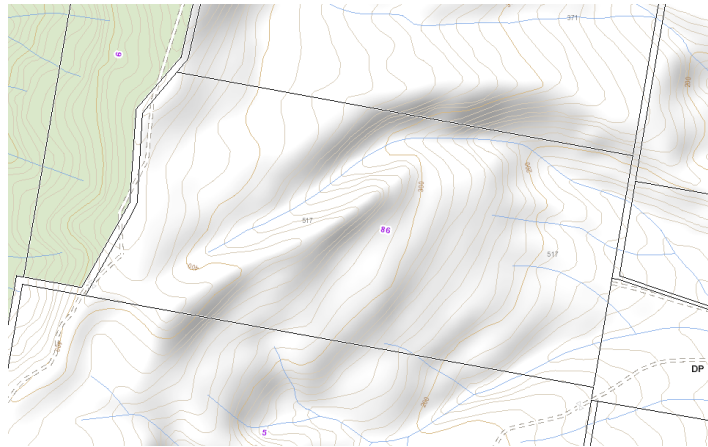


Figure 2 – Topographic view of property

2.3. Surrounding development

Development surrounding the property is minimal. To the west of the property is Killarney Nature Reserve managed by NPWS. To the north, south and east is private property zoned RU1. The properties to the north and south are predominantly forested and used for recreation and forestry. The property to the east is predominantly cleared and runs beef cattle.

3. Details of proposal

3.1. Proposed works

The NSW Government defines Farm Forestry as the sustainable management of native forests on private property for a range of values including:

- timber production
- biodiversity conservation
- pest and weed management
- fire management
- Aboriginal cultural values.

Under this farm forestry development application, the proposed works include:

- roading,
- harvesting, and extraction of logs and timber,
- portable milling
- timber stand improvement,
- burning,
- pest and weed control.

For more detail about these activities refer to the Forest Management Plan and the Forest Stewardship Plan.

4. Evaluation 4.15

4.1. Matters for consideration:

The following provides an assessment of the proposal against the provisions of Clause 4.15 of the Environmental Planning and Assessment Act.

a. the provisions of

(i) any environmental planning instrument

State Environmental Planning Policies

State Environmental Planning Policy (Koala Habitat Protection) 2020 (Koala SEPP 2020) applies to the development. The site contains potential koala habitat under Koala SEPP 2020. Surveys indicated that no core koala habitat is present and therefore preparation of a Plan of Management is not required. For an explanation of how compliance was achieved refer to the Flora and Fauna Assessment Report prepared by Birdwing Ecological Services.

Local Environmental Plan

Under the Dungog LEP 2014 the property land is zoned *RU1 Primary Production*. Forestry is a permitted activity on *RU1* land with Council consent. The objectives of this zoning include:

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- To encourage diversity in primary industry enterprises and systems appropriate for the area.
- To minimise the fragmentation and alienation of resource lands.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.
- To provide for recreational and tourist activities that are compatible with the agricultural, environmental and conservation value of the land.
- To promote the rural amenity and scenic landscape values of the area and prevent the silhouetting of unsympathetic development on ridgelines.

Forestry is a form of primary production. The proposed forestry activity will maintain the natural resource base and be conducted as an ecologically sustainable management activity. This is to be achieved through site specific plans (refer Forest Management Plan and Forest Stewardship Plan) and by compliance with the [Private Native Forestry Code of Practice for Northern NSW](#).

The timber harvesting activity proposed on the property will be selective and light (refer Forest Management Plan) and spread over a 15-year period. The proposed approach will ensure compatibility with the environmental and conservation values of the land and maintain the scenic landscape values which are a feature of the Main Creek valley.

(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the [consent authority](#) (unless the [Planning Secretary](#) has notified the [consent authority](#) that the making of the proposed instrument has been deferred indefinitely or has not been approved)

Not applicable.

(iii) any development control plan

Not applicable.

(iiia) any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F

Not applicable.

(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph)

Not applicable.

b. the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.

A statutory environmental assessment was completed for the proposal regarding the:

- Biodiversity Conservation Act 2016,
- Environment Protection and Biodiversity Conservation Act 1999,
- State Environmental Planning Policy (Koala Habitat Protection) 2020 (Koala SEPP 2020).

The statutory assessments determined that:

- The proposal would be unlikely to result in a significant impact on any threatened species or ecological communities listed under the BC Act.
- The proposal would be unlikely to result in a significant impact on any Matters of National Environmental Significance (MNES) and therefore would not require referral to the federal Minister of the Department of Climate Change, Energy, the Environment and Water (DCCEEW).
- The site contains potential koala habitat under Koala SEPP 2020. Surveys indicated that no core koala habitat is present and therefore preparation of a Plan of Management is not required.

How the environmental impacts were identified and assessed and the steps taken to protect the environment or lessen the expected harm, are detailed in the Flora and Fauna Assessment Report which includes a Biodiversity Test of Significance.

To minimise any residual environmental impacts of the proposal several mitigation measures recommended by Birdwing Ecological Services have been adopted. These measures which are in addition to the prescriptions of the PNF code include:

- Active control of lantana and other noxious weeds,
- Biosecurity protocols for harvesting and roading machinery,
- Survey of new road lines for threatened flora.

In addition, contractors will be required to comply with the following LLS guides:

- [koala search guide for farm forestry](#) to minimise the risk of injuring a koala when tree falling.
- [Managing farm forestry and bushfires](#)
- [Drainage feature protections](#)

The social impacts of harvesting will be mitigated by the operations being small scale, low intensity and intermittent in nature. Tree harvesting operations will be commonly scheduled over several months each year when conditions are suitable. Neighbours adjoining the property will be informed when harvesting is to occur including the NPWS who manage the Killarney Nature Reserve which adjoins the western boundary. The neighbours to the north, south and east have already been advised about the proposed activity and are not concerned about it.

The proposed development will have a positive economic impact generating income from the sale of timber. The applicant is a local resident so money made will be spent locally.

c. The suitability of the site for the development

The property is well suited to forestry. Having an easterly aspect and reliable rainfall it supports good tree growth and a broad range of durable hardwood species within proximity to a broad range of markets. The timber produced on the property will service markets within the building, construction, mining, energy, and agricultural sectors.

Forestry has been occurring in the area for over 100 years and use to be a dominant land-use. The native eucalypt forest which covers most of the property is predominantly regrowth that has been previously logged and cleared for grazing. The forest in middle of the property has not been previously cleared but has been selectively logged on multiple occasions.

d. any submissions made in accordance with this Act or the regulations

Nil

e. the public interest

The development is in the public interest because the timber produced from the property is renewable, will be sustainably sourced, supports employment in wood processing and will service local and regional demand for hardwood products.

A [2023 survey](#) of attitudes toward native forestry reveals a diverse range of views around how native forests should be managed with most people recognising native forestry as a legitimate industry that is important for rural economies (Box 1).

Demand for NSW hardwood timber is growing however domestic supply is in [decline](#). Historically publicly owned State forests have been relied upon to meet most of the State's and region's hardwood timber needs. Only 12 percent of NSW public forests remain available for sustainable timber production (Figure 3).

The closure of public native forestry in Western Australia and Victoria and increasingly strict [regulation](#) of NSW public forestry has reduced hardwood timber availability, pushed up prices and increased imports. The plantation timber sector has also reduced in scale because of the 2019-20 bushfires. Together these and other changes have seen the value of Australia's timber trade deficit grow to over [\\$4 billion per year](#).

The quantitative research has found there are strong indicators that point to the native timber industry having social licence to operate.

Key findings to support this statement are found in the extent of the agreement with the following statements:

- 72%: NSW native forest harvesting is a **legitimate** industry
- 48%: NSW native forest harvesting is an **ethical** industry
- 50%: I **trust** the NSW native timber industry

When those who 'don't know' are removed the responses are:

- 86%: NSW native forest harvesting is a **legitimate** industry
- 68%: NSW native forest harvesting is an **ethical** industry
- 67%: I **trust** the NSW native timber industry

These findings are supported by attitude statements. The top five attitude statements agreed with were (strongly agree/agree):

- 70%: Hardwood timber harvesting is important for rural economies
- 67%: Some of our public native forests should remain available for producing hardwood timber
- 66%: Australia should not import native hardwood from overseas and use its own hardwood timber
- 64%: Selective harvesting only uses a small area of NSW native forests
- 62%: Timber harvesting contributes to the management of State forests

Imported hardwood timber comes mostly from developing nations and is not subject to the same regulatory requirements as in Australia. This development is in the public interest because it will help reduce reliance on imported tropical hardwoods. It will also help ensure that hardwood timber remains affordable at a time when cost of living pressures is high.

Timber from the property will service both local and regional demand. There is strong demand for high quality logs from local and regional wood processors.

High quality hardwood logs will be used to produce a broad range of sawn timber products including flooring, decking, pergolas, decorative veneer, benchtops, stair treads, internal cladding, and furniture. Because the timber is highly durable small high-quality logs can be sold to Koppers and Coffs Harbour Hardwoods who produce power poles which are an essential component in the affordable supply of electricity. High-quality large logs can be sold as girders which are used in the restoration of historic bridges like the one at Clarence town.

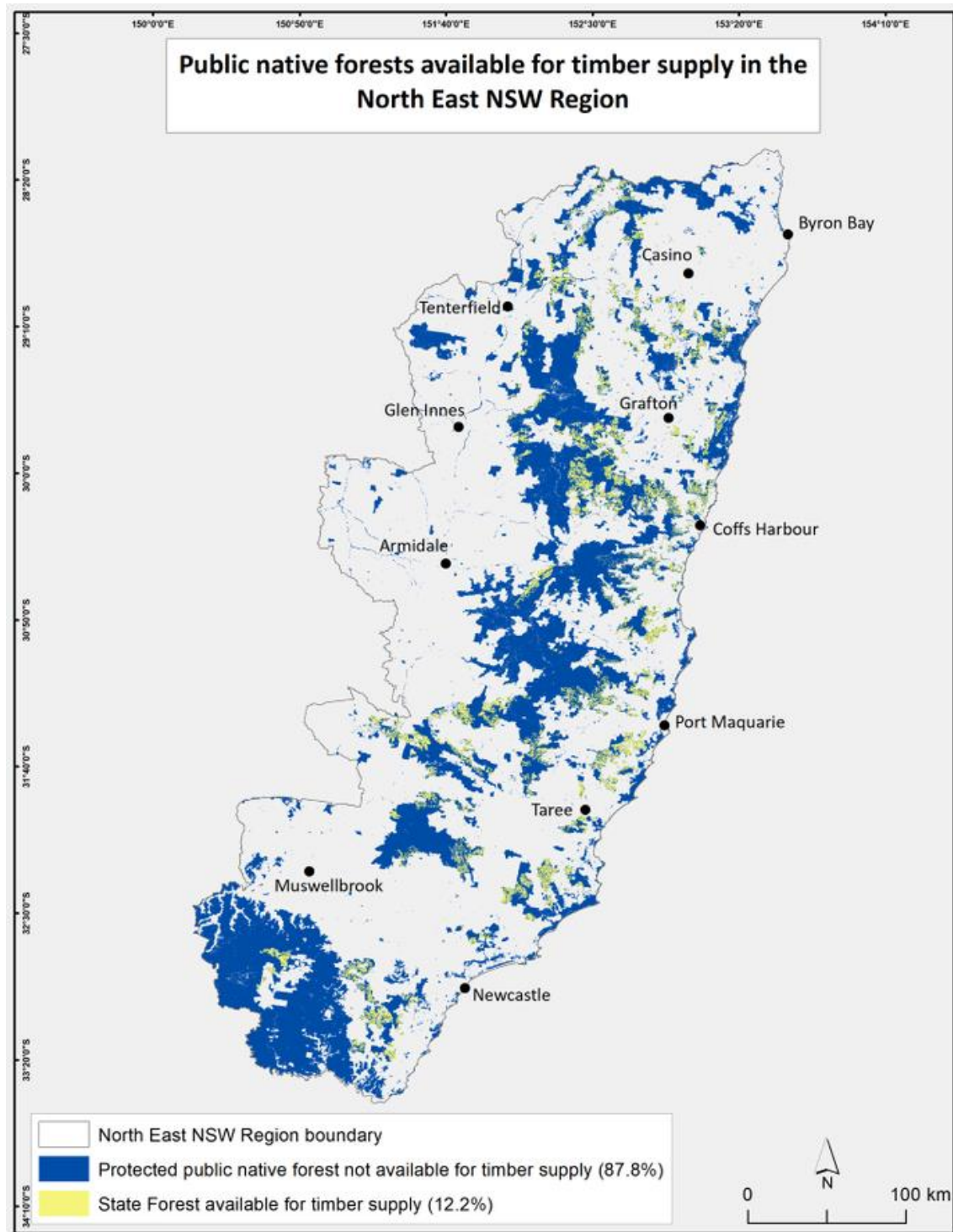


Figure 3 – Public native forest in north east NSW available for timber harvesting and reserved from timber harvesting (data source: NSW DPI)

Low quality logs are also in demand for processing into industrial and mining timbers and hardwood pallets. Locally there is strong demand for hardwood split and round posts for use in rural fencing. [Weathertex](#) at Heatherbrae generates demand for low quality roundwood (pulpwood thinnings) which is used to produce high value external cladding for residential housing.

The development is in the public interest because it will be conducted in accordance with ecologically sustainable forest management (ESFM) principles. This will be achieved through sensitive and careful long-term planning (refer Flora and Fauna Assessment, Forest Management Plan, and Forest Stewardship Plan). The [Private Native Forestry Code for Northern NSW](#) will govern how operations on the property are conducted. This regulation was renewed in 2022 with updated prescriptions to protect environmental values.

5. Other considerations

5.1 Visual Impacts

Timber harvesting can impact on visual amenity if undertaken at a large scale or at high intensity. For this development timber harvesting will be small scale and highly selective. The visual impact of harvested tree heads and extraction tracks will be temporary and minor and not noticeable if viewed from more than one hundred metres.

The proposed harvesting will not be visible from any of the dwellings on surrounding properties or from Main Creek Road. For more detail refer to Plan of Management to Minimise Adverse Impacts on Amenity and the Forest Management Plan.

5.2 Open Space

Not applicable.

5.3 Overshadowing and Privacy

Not applicable.

5.4 Noise

Five dwellings exist within a kilometre of the property's boundary (Figure 4). Four are occupied dwellings located to the east of the property. The nearest two dwellings are located 700 metres and 850 metres respectively from the eastern boundary. Between these dwellings and the property's boundary is a forested hill that will act as a noise buffer. The other two dwellings are located approximately one kilometre from the eastern boundary and are screened by native vegetation.

The fifth dwelling is located 780 metres to the south of the property's south-west corner. This dwelling is used as a weekender by its owner and is also well screened by native vegetation.

There are no dwellings to the north or the west.

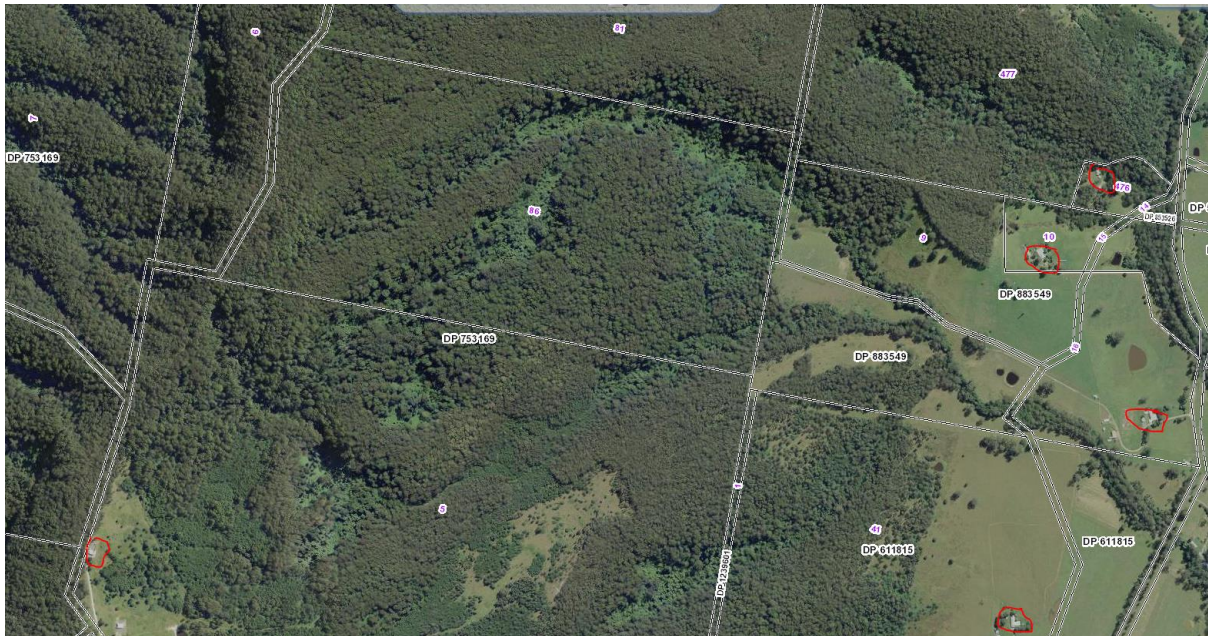


Figure 4 – Nearest neighbouring dwellings circled in red

It is highly unlikely that forestry operations will pose a noise disturbance to the neighbours due to the separation distance and the intermittent/infrequent nature of the proposed operations.

The proponent has established good relations with all existing neighbours and will follow the '[LLS Good Neighbour Protocol](#)' to minimise the risk of any conflict.

Refer also to the Plan of Management to Minimise Adverse Impacts on Amenity.

5.5 Erosion Control Measures

Erosion mitigation protection of waterways will be achieved through compliance with the [Private Native Forestry Code of Practice for Northern NSW](#) and the LLS approved Forest Management Plan.

5.6 Economic and Social Impacts

The hardwood industry in North East NSW is an important contributor to the regional economy generating [\\$700 million in value added and 5,700 jobs](#). This development will help retain forestry jobs and economic activity at time when public native forestry is under increasing pressure from alternative land-uses.

To reduce the risk of any social impacts the '[LLS Good Neighbour Protocol](#)' will be followed. Neighbouring landholders will be informed of the proposed operations before they commence.

If a complaint is received all reasonable attempts will be made to address the complainant's issue.

5.7 Environmental Benefits

Activities that will be beneficial to the environment include ongoing control of exotic pests and weeds and mosaic burning.

Thinning of the forest will promote forest canopy health and provide more resources for the development of retained trees including the development of future hollow-bearing trees.

For more details regarding these activities and their benefits refer to the Forest Management Plan and Forest Stewardship Plan.

5.8 Disabled Access

Not applicable.

5.9 Security, Site Facilities and Safety

Timber harvesting is a hazardous activity. Only experienced contractors will be used. When timber harvesting is in progress, Contractors will be required to:

- Display Warning signs on access roads and tracks.
- Comply with all WHS requirements and have first aid equipment onsite.
- Cease operations on total fire ban days.
- Implement biosecurity requirements details in the Forest Management Plan,

5.10 Waste Management

During harvesting special care will be taken to avoid oil and diesel fuel spills. Oil and diesel will not be allowed to be stored on the site.

Following timber harvesting the tops of trees (heads) will remain as residues or waste. Larger tree heads will usually contain seed capsules. The smaller parts (<10 cm diameter) of these heads will be burnt to reduce fire hazard and promote regeneration. The larger parts will be retained as coarse woody debris which has value as animal habitat.

Portable milling will generate small quantities of sawdust and sawn offcuts. The sawn offcuts will be used as firewood. The sawdust will be spread out and left on site to compost naturally.

Harvested logs will be debarked on log dumps. Prior to the completion of operations, the waste bark will be spread along snig tracks where it will breakdown and naturally compost.

Hazardous chemicals will be used from time to time to control noxious weeds. Safe handling procedures will be applied, and chemicals will be stored off-site when not in use.

5.11 Building Code of Australia

Not applicable.

5.12 Traffic

Quantities of timber produced will vary from year to year. The greatest amount of activity is expected to occur in 2024/25 when it is planned to produce up to 800 tonnes of log product.

800 tonnes of logs equate to 35 loaded trucks or 70 truck movements. If concentrated over a two-month period, this equates to an average of 0.8 movements per day or 5.3 movements per week. This is a worse case scenario with the actual number of movements likely to be much less because of lower quantities and activity being spread over a longer period.

Product removed as roundwood will be mostly pulpwood (thinnings) which is expected to be transported to Weathertex at Raymond Terrace or SA Relf & Sons at Bulahdelah (Figure 5). A limited quantity of poles and sawlogs will also be transported on log trucks. Sawn timber will be transported on small or medium rigid trucks.

Articulated trucks are large heavy vehicles that can be imposing for other road users.

Residents are familiar with the need to watch out for trucks. A large dairy operated on Main Creek Road for many years which involved multiple articulated truck movements per day. The road is also the main log haulage route for timber coming out of Chichester State Forest which is located about 10 kilometres to the north of the property. Unlike milk trucks, log trucks have fold-up jinker trailers that reduce their length by half when travelling empty.

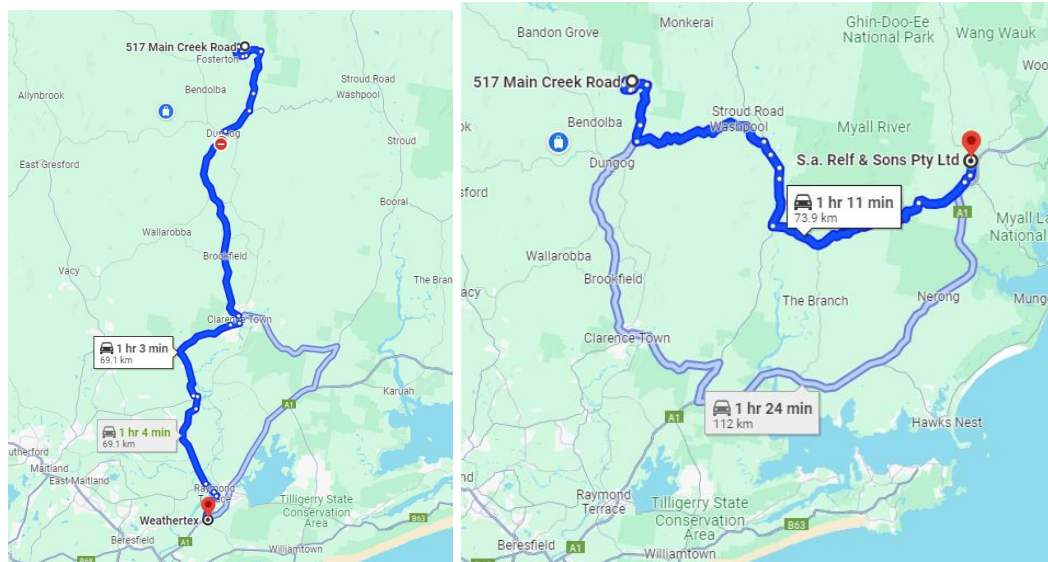


Figure 5 – transport routes between the property and wood processing facilities at Heatherbrae and Bulahdelah

5.13 Stormwater/flooding

Not applicable, the site is not flood prone.

6. Conclusion

The site has been assessed as suitable for forestry. The proposed works have been carefully planned and are in accordance with ecologically sustainable forest management principles. Comprehensive steps have been taken to identify the property's environmental values and apply protective measures to minimise their harm. Where environmental impacts arise, they will be temporary and minor. The proposed works have been designed to limit the impacts of waste, traffic, noise, and visual amenity and there is a procedure in place for maintaining good neighbour relations and managing complaints should they arise. In conclusion, the development meets the requirements of 4.15(1) of the Environmental Planning and Assessment Act 1979 and should be approved.