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Att. Kristie Hughes  
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Dear Sir/Madam,

**Re: PP-2023-1376 Proposed Rezoning Lot 261 DP 1262316 & Lot 11 DP 807867 No. 68 Rankin Drive, Bangalow – Response to DPI Comment**

I refer to the correspondence from the Department of Primary Industries and Regional Development (DPIRD) dated 30 September 2024 providing comment on the Land Use Conflict Risk Assessment (LUCRA) prepared by HMC Environmental Consulting (HMC2022.1062.02).

The comment received from NSW DPIRD is provided as follows for easy reference:

*"The Department has reviewed the LUCRA taking note of the recommendation regarding the existing vegetated buffer between Hinterland Way and the site being retained at a minimum width of 5m. We also note the LUCRA has not addressed noise generated by the Hinterland Way (a 4-lane road) to the proposed development. This should also be a consideration in the design of the vegetative buffer. A 5m vegetated buffer is not considered an effective distance to reduce land use conflict risks considering the location of the site to agricultural production activities.*

*The recommended separation distance between residential development and macadamia nut production is between 250m and 300m. The use of a vegetated buffer can reduce the requirement for this distance however requires the following elements to be considered an effective risk reduction measure:*

- *be a minimum width of 30m*
- *contain random plantings of a variety of tree and shrub species of differing growth habits, at spacings of 4m to 5m and mature plant heights ranging from small shrubs to large trees of 15m or taller*
- *include species that have long, thin and rough foliage which facilitate the more efficient capture of spray droplets (species endemic to the location)*
- *provide a permeable barrier that allows air to pass through the buffer (at least 50% of the screen should be open space)*

*Plant species should not include host species for fruit spotting bugs or other pests known to affect macadamia plantings."*

Accordingly in response, I advise that in relation to the vegetated buffer, there was a typographical error in the final recommendation of the HMC report. The recommendation incorrectly states that the "vegetated buffer to be a minimum width of 5m". Through the report the vegetated buffer is described as a minimum of 30m in width, specifically Table 7 within Section 3.3, the conclusion and the Site Plan in Appendix 5.

It is therefore confirmed that the existing vegetated buffer is already a minimum of 30m width. The vegetated buffer was first established in the 1990s with the construction of Hinterland Way, and therefore has existed for a considerable period. The vegetation is mature with a dense understorey which would provide an adequate buffer for spray drift from the macadamia plantation.

In regard to road noise generated by the Hinterland Way, it is advised that the 30m minimum vegetated buffer will provide noise reduction via distance and will also provide an effect visual barrier. It is recommended that future residential developments on the rezoned property should be designed and constructed with

consideration to the noise generated by the Hinterland Way. Built solutions suitable for future residential lots include fencing, insulation and double-glazed windows.

A revised report is attached with the 5m description corrected to 30m, highway noise addressed. The revised report contains all the information as a complete standalone document for ease of the approval process. The final recommendation in the revised report is worded as follows:

The existing minimum 30m vegetated buffer between Hinterland Way and the subject site is to be retained and maintained as described below, to ensure the vegetation is sufficient in trapping and minimising any chemical spray drift and dust from the farming operation entering the proposed rezoning site:

- a minimum width of 30m
- foliage from the base to the crown
- a variety of tree and shrub species of differing growth habits, at spacings of 4m to 5m and mature plant heights ranging from small shrubs to large trees of 15m or taller
- include species that have long, thin and rough foliage which facilitate the more efficient capture of spray droplets (species endemic to the location)
- provide a permeable barrier that allows air to pass through the buffer *(at least 50% of the screen should be open space)*

It is therefore considered that the information provided above and detailed in the attached revised report, is satisfactory to achieve an acceptable risk ranking for the proposed rezoning.



Helen Tunks  
Director  
HMC Environmental Consulting

cc. R. Downey, M. Campbell