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**To:** [Jon Stone](#)  
**Subject:** FW: Webform submission from: Draft Master Plan for the Iron Gates Residential Release at Evans Head  
**Date:** Wednesday, 4 December 2019 4:31:37 PM

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**Sent:** Wednesday, 4 December 2019 4:24 PM  
**To:** DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>  
**Subject:** Webform submission from: Draft Master Plan for the Iron Gates Residential Release at Evans Head

Submitted on Wed, 04/12/2019 - 16:24

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Submission: 4 December 2019 NSW Department of Planning & Environment Re: Draft Master Plan, Iron Gates, Residential Release Evans Head : Feedback To whom it may concern 1.

Introduction Please find below my feedback on the Iron Gates Draft Master Plan which has been submitted to the NSW Department of Planning and Environment by developer Goldcoral Pty Ltd.

In my opinion the Draft Master Plan does not satisfy the requirements of SEPP 71 Part 5 Clause 20 and has not been prepared with the care which such a large and controversial development requires. Furthermore, I do not think that the 'Appendices' offered in support of the Draft Master Plan are either rigorous or accurate in their summations. My reasons are detailed below:

2. Background to this development The proposed development, the subject of this Draft Master Plan at Iron Gates outside Evans Head has a history of developer instigated illegal clearing and of that developer then avoiding Court Orders from the NSW Land & Environment Court in the 1990s. Although the developer company now has a different name to that belonging to the developer in the 1990s the person behind both companies remains the same, Mr Graeme Ingles.

I include this background because I feel it is important to set the scene for my objections to this development: Richmond Valley Council DA Number 2015/0096 and this Draft Masterplan prepared for Mr Ingles' new company Goldcoral Pty Ltd. It is a solid principle of Australian law that persons should not be allowed to profit from illegal activities, even to earning money subsequently from writing about former illegal activities. Graeme Ingles, through his company Iron Gates Pty Ltd, was found to have illegally cleared land at the Iron Gates site by the NSW Land & Environment Court in June/July 1997. The breaches of the development consent were found to be so serious that the development consent was rendered null and void. In a landmark judgement, the Court ordered a full restoration of the site upon which substantial works had been done. The court orders were extensive and detailed. AL OSHLACK v. IRON GATES PTY

LIMITED No. 40152 of 1996 [1997] NSWLEC 89 (4 July 1997) The Court Order was avoided by Mr Ingles who chose to make his company, Iron Gates Pty Ltd, bankrupt. The drains, land and road, the subject of the court order, have been left un-remediated and have regenerated to a point so as to be habitat for wildlife again. The infrastructure, which should have been removed, has deteriorated to a significant degree due to lack of maintenance. However destroyed Bandgalang heritage sites cannot be restored. Moving on around 20 years and Mr Ingles is back with another company, Coldcoral Pty Ltd, of which he is the sole director with a DA to develop the same land. Again the land is owned by another of his companies. Iron Gates DA 2015/0096 was first presented in late 2014 following more unauthorised clearing of culturally sensitive land next to the Evans River on the Iron Gates site. This extensive alleged illegal clearing has been investigated by the Department of Lands but no determination has been released. The local custodians were very distressed by both the original illegal clearing, which included significant cultural heritage and sacred sites and this later unauthorised clearing which they stated removed more of their cultural heritage in the form of one or more scarred trees. There was significant opposition to the DA in 2014-15. The DA was re-submitted again in 2015. There were around 64 submissions, all against the proposed development, and it disappeared for another 4 years. What many in the community, including the Bandgalang custodians, are asking is how can this man, Graeme Ingles, again seek to make money from this land after committing acts which were found by a court to be illegal? How can he refuse to rehabilitate but still own the land and come back and try again to proceed with his development the size of which will swamp the small town of Evans Head with a 650 person satellite village? Back in 1997 Justice Pearlman of the Land & Environment Court gave extensive remediation instructions and when Mr Ingles, through his legal team pleaded hardship, Pearlman J stated: "Mr G A Ingles, who is the major shareholder of the developer and controls its operations, gave evidence about the financial affairs of the developer, the group of companies of which it is part, and himself. That evidence demonstrated that it would be financially difficult for the developer to carry out remediation which required the removal of the drains and internal roads as well as revegetation of the site, but there was no conclusive evidence that the developer would be unable to meet the cost. Funding may need to be obtained from borrowings or rearrangement of assets within the group of companies, but there was no evidence which would warrant refusing to make the remediation orders." AL OSHLACK v. IRON GATES PTY LIMITED No. 40152 of 1996 [1997] NSWLEC 89 (4 July 1997) my emphasis Pearlman J seems determined that Ingles and his companies should remediate the land. He does not say "..... if you feel like it". It seems to me that the Court's intention was that Mr Ingles should use all his resources to fix the problems he had knowingly created. Also, it seems to me that there is no time line to the order. I would suggest that the order is still current. I believe that Mr Ingles was in Contempt of Court when he bankrupted his company, Iron Gates Pty Ltd and did not use monies from his other related companies and / or loans to restore the Iron Gates site. I believe he remains in Contempt of Court. Mr Ingles was and remains a rich Queensland developer. How could he avoid a NSW Court decision and order? Even if he can rely on company law to limit liability isn't what he is doing morally wrong? If Mr Ingles succeeds with this development what message does that send to the community and particularly our young people? What we should be telling our young people, and the world, is that in Australia nobody is above the law. We should be able to show that those with power and influence can be held to the highest moral account. 3. Fire It is also of note that throughout the Bushfire Report & Assessments (Annexures 3) the development is referred to as a 'low density'. However, in all other materials it is referred to as low to medium density. This makes a huge difference to the numbers of houses and people. There is an allowance for 40% of constructions to be duplex's. In fact, as the smallest lots are to be at least 600 square metres Development Control Plans within

the Richmond Valley Council area allow all lots to be dual occupancy. Is this an oversight on the part of those preparing the Bushfire Assessments? Surely it could not be an attempt to mislead. If it an oversight it does not fill me with confidence that any part of the bushfire assessments should be relied on. The fire prone nature of the subject site, its inaccessibility and its isolation from the township of Evans Head present a significant obstacle to this development proposal. At the time of writing no 'General Terms of Approval' have been issued by the Rural Fire Service. I believe that such approval should not be granted for the reasons stated below. Although there is now a fire assessment of the road I think there are conflicts between what Planning & Fire Regulations require for a safe road construction and the requirements for environmental protection of SEPP 14 wetlands. Who will monitor at a later date along the Iron Gates Drive to see that SEPP 14 wetland trees are not disturbed during ongoing routine maintenance? Who will monitor residents to see that they don't destroy valuable vegetation during times of high bushfire risk? Fear of being swamped by fire could result in unlawful clearing of important habitat. What will be the risk of, or result of, vehicle accidents adjacent to SEPP 14 wetlands? There are several pinch points along the Iron Gates Drive that could still be an issue in the event of a serious bushfire event or indeed in the event of a flood. I also have grave concerns for a satellite town constructed in an area surrounded by bushland and forest. Even a cursory glance at the aerial photographs shows a site surrounded by trees and bushland. Do the planners seriously think that a potential fire in the Bundgalung National Park wouldn't jump the river? The fires burning currently in NSW and in California USA show that we are entering a new era in fire ferocity. The ABCs 7:30 Report 6th November 2019 had the most experienced of fire fighters stating that fire no longer behaves in the way that has been traditionally expected. Former NSW Fire Chief Greg Mullins has voiced his concerns and stated that this new era of fire is far more intense, driven by wind and far harder to fight. He stated that the old rules no longer apply. The Bushfire Reports in Annexure 3 refers to 'normal' fire conditions. There is no longer any 'normal'. In the last few weeks fires have ravaged NSW and fire chiefs have stated on radio and television that they simply do not have the resources to protect all homes. Hundreds of homes have been lost in NSW and at least 6 lives over the last weeks, 2 at Bora Ridge in the Richmond Valley Council area. On the 30th November 2019 the Myall Creek fire in the Richmond Valley Council area covered a land mass of over 100,000 hectares and after 3 weeks was still burning out of control threatening many local communities. Climate change poses an increased risk to people in fire prone areas. I do not think this issue was addressed in Annexure 3 Bushfire Assessment Additional Information or the original Annexure 3 Bushfire Assessment. On the 26th November home owners in the Over-50s Residential Village at Doonbah, around half a kilometre from the proposed Iron Gates site overland, were evacuated by the Rural Fire Service (RFS), with a police presence, because it couldn't guarantee that the RFS would be able to protect the site, homes or lives from the Bora Ridge/Myall Creek fire which was heading towards Woodburn at the time, driven by fierce winds and hot temperatures. Another satellite village in the same vicinity is one more that the RFS would not be able to guarantee to protect. On the same day residents of South Evans Head were advised to prepare to evacuate. I live to the south of the Evans River, within the town perimeter, and I was told by an SES person that if the fire came closer to the town they could not guarantee there would be capacity to protect my home and I should evacuate sooner rather than later. The inference was that the main town would be protected but not the areas on the south side that abut bushland. I chose to stay to protect my home. Luckily that fire risk has now abated. In addition, the building codes for high risk fire areas add significant construction costs to a build meaning that with the costs of blocks estimated at around \$400,000 the total cost of the homes will not be affordable for local people. There will be no low cost housing on this development. SEPP 71 Part 2 Clause 8(o) requires that developments

create compact towns. This proposed development at Iron Gates is in effect a satellite village outside the town of Evans Head. The access road of around one kilometre passes through wetlands which flood with parts protected as SEPP 14 wetlands. This area can never be built on meaning that the site will remain isolated from the town. Approving this Draft Master Plan would put in track a development which would knowingly put peoples' lives at risk. There are enough people already living in NSW with the constant threat of bushfires engulfing their properties without adding to the number. I believe there are better places to build houses than on the Iron Gates site.

4. Cultural Heritage SEPP 71 Part 2 Clause 8(l) The updated Cultural Heritage Assessment (Annexure 9) shows an unbelievable lack of awareness of how Indigenous culture operates and really takes the arguments no further than the report in 2015. The assessment ignores the distress caused to the traditional owners of the illegal clearing in the late 1990s, which destroyed many culturally significant sites. It simply refers to a 'disturbed' landscape. The same developer, albeit with a different company name, again cleared sites of significance prior to lodging the first draft of this DA in 2014/15. I myself saw traditional owners in tears at this time. This is a site of marriage, burials and celebrations akin to those held in a western cathedral. The fact that it stretches across the Evans River looks to the size of the community it once served. This whole area is sacred to the Bandgalang people who are part of the larger Bundgalung nation. This coastal region is one of the last on the eastern seaboard that has sites and traditional landscapes that are intact. This means that the traditional owners can pass their stories, culture and their language on to their children and grand-children. Their culture and language is alive; it is not a dead thing. It is not sufficient to say we can sweep up the bits of the bulldozers damage, put it in a pile with a sign about heritage and that will be sufficient to make the development ok. (Pages 4 and 5 Annexure 9). In fact such comments are offensive! Development should not be allowed to proceed on Bandgalang sacred lands. The Iron Gates area is incredibly important to the local Bandgalang clan, as is the whole town of Evans Head, the surrounding National Parks and the Dirawong Reserve. They all form part of their story. It is a story of a whole cultural landscape. The National Parks and the Reserve are part of the successful Native Title claim which was finally granted in late 2013. The Federal Court convened in Evans Head to hand down this historic decision marking the importance of this area to the Bandgalang clan and the Bundgalung Nation. This success was the result of years of determined effort on the part of the custodians who still hold their culture intact. The Iron Gates area is a central part of their history which is often not given easily to 'white fellas'. The local custodians will be putting in their own submissions so I will simply add the those preparing the Cultural Heritage Report which is part of this DA and Draft Master Plan have 'cherry picked' among local Bundgalung families to find those who would support the development. It is my considered opinion that some way should be found to include this land in the National Park system and in that way return it to the Bandgalang custodians with a big apology for the damage which has been done to the sacred sites and the pain caused to these custodians.

5. Environment SEPP 71 Part 2 Clauses 8 (g)(h)(i) I note that it is not considered necessary to produce a Species Impact Statement (SIS) for any of the endangered species identified as possibly present in the survey (Annexure 7 & 8). I submit that the extensive list of species, particularly bird species, indicates an ecological system that provides habitat & food even in its regenerating state for considerable & diverse interdependent populations and that a SIS for this ecological community should be considered. It is not sufficient to visit a site a few times, have a quick look around and see nothing & then posit that nothing is there. Many species are visitors; others use the area as a wildlife corridor between the Bundgalung and Broadwater National Parks. The nature of the feed sources for many birds and animals is that they are seasonal so the species are always seasonal visitors. They are simply not there all the time and such a limited study as the developer has

commissioned is wholly inadequate. Without a long term study it is impossible to know what animals are there and how they use the site. Because of illegal clearing in the 1990s and purported illegal clearing in 2014 much of this 'island' site has regrowth rather than the coastal rainforest that existed previously. The annexures use the fact of these lesser value plant and tree species to argue that there is nothing to protect as the land has been 'disturbed' with no valuable species and no wildlife. The reasons for this 'disturbance' are illegal clearing and avoiding a Court Order. I would take issue with the challenge to SEPP 14 posed by the writers. I think a second opinion should be sought. At any rate, there is a large SEPP 14 wetland in close proximity to the eastern side of the site and any development will have an impact on this wetland. How much firebreak will need to intrude on potential SEPP 14 land outside the DA area to provide adequate Asset Protection Zones to protect the site from bushfires? 1,600 sq m of heathy trees (1,200 scribbly gums & 400 sq m for bush fire control), 2,000 sq m of open dry heath and 1.18 hectares of open dry heath with mixed eucalypt will be removed from the site. This will reduce habitat and food for the resident and migratory species identified. It will also have a huge impact on the integrity of the wildlife corridor. Throughout this assessment it is stressed that the area for subdivision is largely composed of degraded bush and previously cleared areas. This ignores the importance of re-growth habitat for species survival and as important wildlife corridors. Further clearing in this area would impact the birds, mammals, reptiles & amphibians identified as possibly present in the limited survey, many of them listed as rare and endangered. Native fauna does not care if the land is re-growth or if it contains some weed species as long as there is food and shelter. Any further clearing might also create isolated populations of some species affecting their ability to survive and ultimately have an impact on genetic bio-diversity. Approximately 159 swamp orchid plants (*Phaius Australis* or *Phaius tancarvilleae*) were identified in Environmental Retention Areas of Lots 179 & 182 of the DA submitted to Richmond Valley Council in late 2014. (The current DA is merely an updated version of that original DA and has the same DA number as the current one.) The environmental retention lots are found in the triangular area in the centre of the updated proposed development.) Both species are listed under ss178, 181 & 183 Environment Protection & Biodiversity Act 1999 (Cth) as threatened species. Swamp Orchids have not previously been identified or studied in the Evans Head area so these are newly discovered population, which could be scientifically extremely important being a much larger community than any other known site in NSW. The current largest known population is in Yuraygir National Park, near Yamba, with 50 plants. This area of the site is adjacent to the drains that are to be filled in and will therefore be subject to huge disruption. Most of the plants identified will also be bound on all sides by either roads or fire trails. "Illegal Collection is considered one of the major threats to the swamp orchid. Orchid enthusiasts regard this species as one of the most desirable species for their collections and exploitation of the wild populations is a continuing and constant threat (NSW DECCW 1998c). Flower stems are often removed from wild plants growing in the vicinity of accessible areas (Sparshott & Bostock 1993), substantially lowering the ability of this species to reproduce (Qld EPA & QPWS 2006). It is thought that some of the collecting of this species is due to cut flower collection, horticulture (NSW DECCW 2005iw), and attempts at perfume collecting (Sparshott & Bostock 1993)." This population will be under real threat from illegal collection, which is identified as a key threatening process, given the proposed proximity to housing on all sides indicated in the DA. S5A(2)(g) EPA Act requires threatening processes to be addressed as part of any assessment. A SIS should be required for this plant so the scientific community has had the opportunity to study the area. In 2019 I note *Phaius Australis* has disappeared from the new environmental assessment although I am sure the plants are still there. Is its removal from the report a willful ignoring of an important species in order to facilitate development? An

oversight? Without an independent SIS we simply do not know. Additional Environmental Issues

“Due to a significant level difference between the proposed subdivision and the environmental zone west of Proposed Road 6 a 6.25m retaining wall is proposed. The wall will be structurally designed as part of the Construction Certificate design.” Annexure 5 ESCIR Revised Appendix A-B at page 6 In response to RVC concerns about the impact of this very large wall (although this writer can find no indications of its length) Arcadis who the developer has engaged for the 2019 Report suggest the following: “Adult Richmond Birdwing butterflies will feed on nectar from flowers of many native plants, including native frangipani (*Hymenosporum flavum*), pavetta (*Pavetta australiensis*), black bean (*Castanospermum australe*) and lilly pillies (*Syzygium* species), as well as several exotic flowers, e.g. buddleia, pentas, honeysuckle, bougainvillea, impatiens and hibiscus. They prefer white and red blooms to other colours” The suggestion of planting exotics such as impatiens (busy lily) beggars belief. It is a weed of wetlands & riparian zones: Impatiens

“Impatiens (*Impatiens walleriana*) is regarded as an environmental weed in Queensland and New South Wales, and as a "sleeper weed" in other parts of Australia. This species has escaped cultivation and has often become naturalised in riparian areas .....” “This species is also naturalised in bushland and around habitation in the coastal districts of New South Wales. It appears on several local and regional environmental weed lists in these parts of New South Wales (e.g. in Warringah Council, Pittwater Council, Lismore Council, the Sydney North region, the NSW North Coast region and the wider Sydney and Blue Mountains region) and has been recorded in some conservation areas throughout the eastern parts of the state (e.g. in Billinudgel Nature Reserve and Tunnel Gully Reserve). Impatiens (*Impatiens walleriana*) is also listed among the invasive weed species that threaten the integrity of particular stands of endangered littoral rainforest in New South Wales.” source Brisbane City Council. Buddleia “Due to the high number of seeds produced and its reliance on wind dispersal to spread, it is easy for Buddleia to rapidly colonise large areas in a short space of time. Buddleia, like many invasive species, does not have the biological controls that affect native plants and as a result are able to grow unhindered and easily out-compete the surrounding vegetation for resources.” ..... “Buddleia can grow almost anywhere, but prefers nutrient-rich watercourses and creeklines, where it quickly dominates, shading out and replacing native plant species.” Source: Weeds of the Blue Mountains

Honeysuckle and Bougainvillea are also plants that are inclined to be invasive species and are listed as weeds. It is hard to understand how Arcadis, a company giving advice about development and in this case a development within a sensitive environmental location, close to a River and to forest and SEPP 14 wetlands could suggest planting such species. I can only assume a complete lack of understanding of the environmental constraints of the site under consideration. I would suggest it makes a mockery of their work. How can anyone trust any of their assumptions after such a glaring misapplication of plant species? Unfortunately RVC does not have a weed list or policy but the above species are a huge concern in this area and will cost many thousands of dollars to remove if they are used and become naturalised. Pets remain a huge issue and increasing pet ownership places a huge burden on our environment. Evans Head is surrounded by National Parks and a very valuable 300 hectare Nature Reserve, the Dirawong Reserve. Dogs are prohibited from these 3 areas which includes the adjoining beaches. There are only two relatively small areas locally where dogs can be exercised, one on Airforce Beach and another along the river next to the Fishing Co-op. Dogs need to be exercised off-lead for their health and general well being. Where will pets on the potential Iron Gates subdivision be exercised? The extra pressure on native wildlife, particularly the koala population will be ongoing. The pressure to create an off-leash area will create conflict between those wishing to protect the wildlife and environment and those who understandably want to exercise their pets. An off-leash area near the Iron Gates site would be disastrous for the local ecology. Subdivision

development next to National Parks is a known extinction issue. The problem of pet cats & dogs entering areas of important habitat or going feral is an issue that cannot be overstated. If the subdivision goes ahead there will be pets and there will be irresponsible owners. In the original 2014-15 version of the DA the koala population was noted: "Numerous koala scratch marks were observed on Blue Gums and Scribbly Gums and favoured foraging trees within the Eucalypt Forest (Vegetation Community 3) indicates that the Koala is a regular occurrence on the Iron Gates site." (page 91) The 2019 version contains an environmental assessment that minimizes koala presence. I believe that this merely indicates that the koala is under extreme pressure in northern NSW. Local koalas have been disturbed due to the construction of the Pacific Highway not far to the west. The Iron Gates remains an important corridor for them between national parks. The updated reports in (Annexures 7 & 8) do nothing to reassure me that any consideration has been given to the environmental imperatives of this site. There was minimal study of the actual site. I do not think it is tenable to visit a site a few times and then report there were no animals found, no migratory species noted and that it therefore probable that they do not exist. Only a serious long term study will tell us what animals are there and it is likely to be far more than the proponents assert. Mr Ingles, or one of his many companies, also owns an adjacent parcel of land. If this development goes ahead with the site further cleared and animals driven out with their corridor blocked what is to stop him pressuring to have that adjacent land rezoned for development with the lack of wildlife and habitat as a major reason? Is this merely the first stage of a much bigger idea? The people of Evans Head simply do not know. This development would sound the death knell for many species likely to be found in the Iron Gates area but because of the lack of an SIS or any other long term study we simply have no reliable data to base any decisions on. NSW National Parks has in the past requested that this land at Iron Gates be included within the Bundgalung National Park to prevent further damage to the environment and to preserve Indigenous heritage. This has been denied. Many in the community felt that after the order from the Land & Environment Court in 1997 that this land should be marked for environmental protection. Wetland areas, such as those surrounding the proposed site and proposed access road, are important breeding grounds for many fish species as well as frogs, lizards and birds. Quality wetlands are being lost at an alarming rate along the Eastern Seaboard. The Evans River still has areas of valuable wetlands much of which are around the Iron Gates site. It is important that these wetlands are not compromised by development. No wetlands no fish!

6. Social Issues relating to Part 2 Clause 8 (d) (e) (f) There are social issues attached to generating what is essentially a satellite village outside a very small rural town with limited resources.

- The population will be remote and likely to be cut off during flood.
- Home-owners in this subdivision will be at an elevated risk of bushfire compared with the general population of the town.
- Because the lots are in a flood-prone area house insurance will be very expensive creating a burden on future owners.
- Because the lots will be in a bush-fire prone area & a flood prone area subsequent building costs will be much higher than for comparable developments elsewhere in the region making the development more difficult to market & thus largely unsold and a burden to the existing rate-payer community of Evans Head.
- No services, such as fuel, shops of any kind are proposed in the DA.
- Because the DA covers land that is in a flood plain numerous insects such as sand flies, mosquitos and leaches are common. This makes for very unhealthy and uncomfortable living. I have visited the site over many years and have found it unpleasant for these reasons. This is another burden for any unsuspecting new home-owners. In relation to biting insects I note the updated Biting Insect Impact Assessment in Appendix 12 to the DA but not included in the Draft Master Plan details the high levels of Mosquito *Culex annulirostris*. The writers dismissed these high numbers as aberrant because there had been rain before the study. It is interesting to note that information

that is contrary to the developer interests is most often dismissed in some way or another. I have lived in Evans Head for 18 years and know that the Iron Gates area is always full of biting insects because it doesn't get a sea breeze. Appendix 12 noted the importance of air flow in combating biting insects. A sea breeze is an important 'air flow'. Many areas of Evans Head which experience very pleasant sea breezes do not have a biting insect issue. Extra amounts of insecticides used to combat these biting pests will inevitably flow into the environment causing problems for the mammals (mico-bats) frogs and lizards and fish that feed on these insects. Next to a National Park, a river and a wetland system this is of great concern. The proposed treatment of the foreshore as a public reserve with car parking, playground & picnic facilities will be a far cry from the natural bushland setting currently experienced by users of the Evans River. Landscaped areas are not natural landscapes! Taking out native vegetation to replace with other species, introduced grasses and built infrastructure will increase the use of the river and the foreshore. Run-off and litter from this extra use will inevitably pollute the river. The visual amenity from the river and the National Park on the opposite bank of the river will be compromised irrevocably. The Influx of traffic from Iron Gates Drive will be channelled around a part of town which is currently very peaceful. These roads are not suitable for the expected traffic volumes of 1685 average vehicle movements per day. Annexure 5 ESCIR Revised Appendix A-B page 13. Much of the traffic will of necessity go passed the K12 School in order to access the Woodburn Road because that is the most direct route or passed 2 local churches. There are huge safety issue to be considered that have not been addressed by the proponent. Global warming and the predicted rise in sea levels and the increase of severe weather events makes any large development in a flood prone area a huge risk to life and property. Consent authorities should be mindful of the future risks of litigation for allowing developments that will be impacted in severe weather events. 7. Conclusion I hope you will take seriously the issues I have raised in my feedback to the "Iron Gates" Draft Master Plan along with all the other feedback that you will receive and refuse to grant approval for this Draft Master Plan under SEPP 71 Part 2 Clause 8. As previously stated the land should have been rehabilitated and returned to as near original state as was possible back in 1997. This omission can be corrected by belatedly enforcing the Land & Environment Court Order of 1997. I am sure that it is not beyond the abilities of the NSW Government to resume this land for the Traditional Owners and place it within the Bundgalung National Park for protection in perpetuity. Yours sincerely E M Saunders BA(hons) LLB Grad Dip Legal Practice

URL: <https://pp.planningportal.nsw.gov.au/draftplans/exhibition/iron-gates>