



FRIENDS OF
KU-RING-GAI
ENVIRONMENT INC.

June 2011

Dear FOKE Members

FOKE AGM and FORUM 11TH MAY 2011

“URBAN CONSOLIDATION -FACTS AND FALLACIES”

Following the Forum, the Guest Speaker, Prof. Bill Randolph, Director City Futures Research Centre Faculty of the Built Environment UNSW wrote to FOKE:

“I wanted to offer some of the evidence we've been researching in this area - to put the Ku-ring-gai concerns in a wider metro context, yet also retain that local perspective without taking a particular view either way as to its desirability. As I said at the meeting, my view is density is fine (and probably inevitable), as long as it's in the context of the community for which it's being proposed and in a manner that's been canvassed and worked out with the community in the frame. It is a big issue that won't go away soon.” (Emphasis added).

In response to Professor's Randolph's comments and qualifications on densification, we print the following opinion which clearly demonstrates that the densification of Ku-ring-gai and the processes involved in it have patently failed Professor Randolph's criteria. The Ku-ring-gai context has been totally ignored. The Ku-ring-gai community has been both excluded from the process and treated contemptuously.

Ethical Issues in Planning

From time to time, political vindictiveness is evident in the planning system in NSW. In the case of the NSW Government's urban consolidation policies, Ku-ring-gai has been treated differently to other Council areas. Unlike other local government areas in NSW, Ku-ring-gai Council was not allowed to develop its own housing strategy consistent with the stated objectives of the Government's Residential Housing Strategies namely strategies which are 'tailor made to local areas and backed by high levels of community consultation.'

In addition, the Minister for Planning refused to gazette local environmental plans adopted by Council to provide statutory protection of the urban conservation areas in Ku-ring-gai which have been identified by the National Trust of Australia as being of National significance.

Furthermore the Council and residents of Ku-ring-gai have been forced to accept a new Town Centres Local Environmental Plan even though LEP 194 gazetted in 2004 already provided the 10,000 additional dwellings required by the Metropolitan Strategy. The gazetted plans are designed to change the character of the area without regard to the national significance of the heritage conservation areas or the national significance of the vegetation.

However the greatest evidence of political vindictiveness is the lack of good will of the State Government towards the Ku-ring-gai community which would have to be one of the greatest examples of discrimination evidenced in the planning system in NSW.

Jane McMillan Town Planner

(Emphasis added. Reprinted from FOKE January 2011)

Please see Newsletter Insert entitled “Mayday for Urban Forests” which expands on the important concluding question/ statement from the floor at the FOKE Public Forum. First, the Insert examines the importance of retaining existing old growth forests in planning for our future cities - for public health and well being, and for vital wild life corridors. The Mayday Insert also calls for legislative change to consider the adverse impacts of cumulative rezoning for development in vanishing “Urban Forests” as exemplified in Ku-ring-gai. FOKE has extended an invitation to Professor Randolph to visit Ku-ring-gai for a site inspection with us.

“Thank you to Professor Randolph for coming to the FOKE Forum and addressing members on a very cold and blustery evening.

It was most useful to gain a policy orientated insight into the destruction of the Ku-ring-gai environment – which was particularly helpful with the new change of government. After all, we still need to keep in mind that all this development that is happening around us is part of a bigger picture. Prof. Randolph’s presentation helped all those present to understand where the policy makers are coming from.

Whilst remaining factual and impartial as any academic should expect to be, slowly but surely Professor Randolph revealed that the policy of urban density and “renewal” has been a complete and utter failure on the North Shore. Instead of catering for those who really need additional housing such as low income earners, Ku-ring-gai apartments average around \$800k each, putting them well out of the reach of all but a wealthy few and Over 55s.

He also showed in facts and figures that building along transport corridors has spectacularly failed to keep drivers off the road, which is another unmet objective of the policy. The overlay map of all the knock downs/rebuilds over the last 5 years was staggering. Thanks to Prof. Randolph for delivering such an engaging and informative presentation”.

Forum Attendee. (Name supplied)



Prof Randolph (centre left) with Mayor Cross (centre right) and residents.



**Viewing FOKE's display material
Over 70 people attended the Forum.**



**Mr O'Dea MP, Mayor Cross with
Prof Randolph (right)**

“UNDER THE CANOPY”

FOKE presented Professor Randolph with “*Under the Canopy - a Centenary History of Ku-ring-gai Council*” which concludes: “*As Council’s housing strategy argued in 2000:*

“Past Ku-ring-gai resident have left a legacy to Sydney of a unique blend of tall forest splendour, large areas of natural habitat and an extensive architectural heritage. It is incumbent on this generation to preserve and where possible to improve upon this legacy for the future.”

Ku-ring-gai Council, the State government and the local community will need to work together creatively to ensure that this happens.”

It is obvious that under the previous NSW Labor Governments this co-operation to preserve the legacy did not happen. The Labor years were a tragic period for Ku-ring-gai and its heritage and amenity.



2005, Avon Rd Pymble “Under the Canopy” context.



2011, Avon Rd Pymble, a Labor Government “seized” site – which excluded Council & the community. There is no respect for built context or canopy.



KU-RING-GAI: BULLIED, BLUDGEONED AND BRUTALISED BY SUCCESSIVE PAST LABOR STATE GOVERNMENTS.

“If there is a portfolio that has crystallised all that was wrong with the former Labor government in NSW, planning is unquestionably it.” SMH June 11-12 2011. The treatment meted out to Roseville resident Dennis Grosvenor caused his acclaimed *State of Siege* documentary to be made. There are ever increasing demands for copies and screenings of the film that includes the bullying, bludgeoning and brutalising of Ku-ring-gai.

Overall, few communities could have done any more than what has been done by the Ku-ring-gai community and its supporters in trying to achieve place appropriate planning that respects the unique character and heritage – the context of this area, for the benefit, not only of its residents, but of the wider Australian community, both current and future.

Premier Hon Barry O’Farrell has promised the citizens of NSW change in the way NSW is governed. One of the major changes announced by the Liberal /National Coalition related to the carriage of planning in NSW. To date, the new Government has scrapped Part 3A, abolished the Ku-ring-gai Planning Panel and exempted Ku-ring-gai Council from SEPP 53 and dual occupancy provisions – the only Council not to have been previously exempted.

On 25 March 2011, the day before the NSW elections, The Sydney Morning Herald’s editorial, *“The Herald’s View: Time for Renewal,”* stated:

*The Coalition must indeed end the bias towards Labor’s heartlands in many areas: roads (think of subsidised tolls on the M4 and M5, not the M2); hospitals (think of the botched redevelopment at Royal North Shore Hospital, and the sale of land there); **planning (think of the brutal redevelopment around Ku-ring-gai and other areas. But once balance is restored, it must be maintained.**” (Our emphasis)*

In order to prevent further “brutal redevelopment around Ku-ring-gai” please see FOKE’s Annual Report (page 4) accompanying this Newsletter. We believe the new Government needs to:

- **Review and amend** the Labor Government imposed Local Environment Plan (LEP 194) for Ku-ring-gai. It is producing inappropriate “brutal” development which is not in keeping with Ku-ring-gai’s heritage and environment.
- **Exclude** critical areas of environmental sensitivity from high density zoning in the Plan which have not proceeded to development stage.
- **Ensure** that the Ku-ring-gai Town Centres LEP 2010, which will deliver a further 4,500 plus dwellings well in excess of the 10,000 target set by Labor, does not come into force.
- **Respect** the electorate’s call for a reduction in new dwellings from 10,000 to 6,000 to be achieved by 2031.
- **Gazette** The National Trust 28 classified Ku-ring-gai Urban Conservation Areas, later studied by Consultants Godden Mackay Logan, which have been stonewalled and refused by the Department of Planning and successive Labor Governments.
- **Commence and set in place** Recovery Plans for the critically endangered Blue Gum High Forest Ecological Community, the endangered Sydney Turpentine Forest Ecological Community and the endangered Duffy’s Forest.
- **Abandon** the Labor Government imposed Sydney West Joint Regional Planning Panel (and other JRPPs) as the Panel overrides certain rights of determination by the democratically elected council and the local community.
- **Review** Private Certification of developments in NSW.
- **Return** transparency and accountability to the NSW Planning system.
- **Address** the acknowledged flaws in the EP & A Act.

DEVELOPERS TARGET INVESTMENT MARKET.

IS THIS WHAT THE URBAN CONSOLIDATION POLICY INTENDED?

The following adds strength to the belief that much of the densification is directed at the overseas investment market rather than providing affordable, diversified housing for the domestic market. True it is, that much of the investment market will become rental stock, but given the pricing of the units it will not be rental stock that is generally affordable, nor provide for the diversity of accommodation either for the younger buyers with families or the downsizers.

"BUYERS STAY CLEAR AS DOLLAR BEGINS TO BITE"

"Chinese abandon Triguboff" Turi Condon Property Editor *The Australian* April 21 2011

"CHINESE buyers have deserted billionaire Harry Triguboff's Meriton Apartments, with sales to Chinese owners and investors dropping from 30 a week to 10 over the past month."

"Mr. Triguboff said prices in the overheated Chinese property market were starting to fall, while the Australian dollar continued its stellar run, making Australian property increasingly expensive compared with China."



"Mr. Triguboff, whose Meriton Apartments builds more than 1000 units a year, said:"

- **Chinese owners and investors had accounted for about 75 per cent of Meriton sales for the last two to three years.**
- **"The new apartment market relied on Chinese buyers."**
- **"The Chinese, they are the only buyers I have. They are the only buyers anybody has.."**
- **"Our (real estate) market is the Chinese market, just like coal and iron ore.."**

The Australian April 21 2011

THERE ARE PRESENTLY 6 MERITON MULTI-UNIT SITES IN KU-RING-GAI TOTTALLING 1050 APPROX APARTMENTS.

RALAN

RALAN, another prominent developer in Ku-ring-gai, is also seemingly targeting the overseas investment market. Many of the units built for Stage 1 of the Ku-ring-gai Residential Strategy are being purchased off the plan by overseas investors 'land banking' these units for investment purposes. The following is an excerpt from an internet video which commences with a non English speaker and promotional views of Sydney (May 2011). It is followed by words to the following effect by the principal of Ralan:

"There is a lot of interest from Chinese people in purchasing Real Estate in Australia, most importantly in Sydney. For any Chinese person considering overseas Real Estate they have to take into account the stability of Australia, the stable economy that we have and the fact that historically the residential market, which is my area of expertise, has always shown great growth, decade after decade after decade. Yes we are very excited about the influx of Chinese investment into the Australian property market."

THERE ARE PRESENTLY MORE THAN 15 MULTI-UNIT RALAN SITES IN KU-RING-GAI, WITH MANY UNITS PRE-SOLD OFF THE PLAN TO OVERSEAS INVESTORS. THE UNITS ARE THEN OFFERED AS RENTAL PROPERTIES.

Sincerely FOKE Committee

A Carroll 9498 1807, K. Cowley 9416 9007, J. Langley (Treasurer), R Maltby (Minutes Secretary), C. Darby, J. Johnston, J. Harwood, D. Mobberley, K. Pickles, J. Posen, D. Warner.

Mayday for Urban Forests.

BIODIVERSITY LOSS, CRITICAL HABITAT and CUMULATIVE IMPACTS ARE URGENT CONSIDERATIONS for THE NSW PLANNING ACT.

Biodiversity is critical infrastructure – the basis of life. Urban Forests and natural habitat remnants are the last biodiversity hotspots in cities. They are increasingly critical flora and fauna corridors. The significance of biodiversity to humans is greater than is understood. As humans seek health, well being and survival in future cities, cumulative impacts on these critical habitats are un-reported tragedies.

We are in “the urban age”. The UN reports that more than half the world’s population lives in urban areas since 2007.ⁱ By 2050 it will be 70%. Australia’s urbanization is higher.

Scientists have long known human physical and mental health and well being depends on biodiversity.ⁱⁱ As biodiversity decreases, human choices for survival shrink.ⁱⁱⁱ

Scientists say its irreversibility makes biodiversity loss the most important issue faced by humanity (Dale and Hill 1996). Biodiversity loss is the most significant environmental problem facing Australia (Lindenmayer, “On Borrowed Time” 2007). In his book “Collapse” Diamond notes that removal of forests, and subsequent “landscape amnesia” and “creeping normalcy”, play major roles in collapse of societies.^{iv} He points to policy makers for failure to perceive the problem of forest removal.

What is Urban Forest? Urban Forest is existing biodiversity in *protected* reserves, as well as connected, *but unprotected*, native and non-native vegetation corridors in golf courses, public parks, ovals, residential streets and private gardens. Especially in environmentally sensitive areas, all linked natural habitat remnants, important seed-bank and sensitive soils, together, form part of precious Urban Forest. Rare, urban biodiversity still exists in listed critically endangered ecological communities, part of Urban Forest within thirty rail minutes of the Sydney GPO – but for how long?



Biodiversity-linkage within Urban Forest is provided by connecting gardens, street trees, golf courses, ovals and parks. All link together with surrounding protected reserves to form corridors and habitat for remaining urban wild-life.



Improper zoning allows biodiversity linkages to be lost when land area and soils are cumulatively removed. By this process the regenerative capacity of native and non-native Urban Forest vegetation is displaced forever.

Urban Forest in Sydney occurs most densely in the north, north west of Sydney and also in southern and western Sydney. Rapid urbanization means biodiversity in the un-protected part of Urban Forest is vulnerable to zoning for development. Due to the importance of biodiversity to human health in future cities, Urban Forest needs urgent protection, through legislation.

Today, lands most desirable to protect have become the lands most likely to be developed. The word “biodiversity” appears seldom, if at all, in land-use planning policy platforms and legislation governing the planning of city futures.^v The absence of specific protective zoning for Urban Forest potentially means the application of “inner-city zoning” in unique environmentally sensitive areas (ESAs). **Unless urgent steps are taken for intergenerational equity in planning legislation including giving protection to Urban Forest by specific zoning, and requiring consideration of the cumulative impacts in zoning for development, we will almost certainly not have Urban Forest in the future.**

How do we know Urban Forest is disappearing? Trees prevent development and their absence facilitates it. Cascading environmental damage commences at, or before, the point of zoning for development. Since each zoning and each development is assessed on its own, the un-assessed “cumulative impact” of zoning for development quickly turns an environmentally sensitive area (ESA) into a construction zone.

Zoning is the most profitable point in the development process. Zoning is also when the greatest damage is done to the environment. Tree preservation orders (TPOs) are of little value. Trees die mysteriously and are easily removed. Tree removal proliferates in dense, rare Urban Forest. Reliable tree record and protection of significant trees by local councils is lost.

The domino effect of acquisition of properties for development, during zoning, is an insidious process. Most locals do not know when and where houses are acquired for development, which rapidly tears neighbours and neighbourhoods apart.^{vi} As newer residents replace long-standing ones, “landscape amnesia” and “creeping normalcy” take over, and the once rich Urban Forest becomes an urban myth. Wildlife populations plummet and without habitat, urban biodiversity quickly disappears.

As the cumulative impacts of zoning increase and population pressures rise, tree removal gathers momentum. Golf courses, churches, schools and other institutions responding to these expansion pressures find the need to remove not one or two trees, but tens and hundreds of trees. This is in addition to tree removals by developers and individuals.

After development has occurred, the hundreds of saplings replanted in the remaining soils cannot replace habitat provided by foliage, branches and hollows of mature trees in an Urban Forest. In this way, environmentally uninformed decision-making and cumulative zoning quickly destroys efforts, by council staff in the field and volunteers, to protect and restore biodiversity.



As sites are cumulatively cleared, the very basis for fragile Urban Forest ie. rich soils and seed-bank, is excavated and removed forever by improper planning.



Replacement building side set-backs leave no room for tall canopy trees which once formed bio-links. Zoning permits a footprint totally inappropriate for an ESA.

The problem lies in the overarching power of Planning Legislation. State (*TSC Act*)* and national (*EPBC Act*)* environmental legislation has failed to prevent biodiversity loss in NSW. The dominance of an ecologically un-informed NSW planning system, corrupted by failures, faults and flaws in that system, forces unreasonable concessions from environmental departments and regulatory bodies, resulting in irreparable biodiversity loss.^{vii}

The NSW planning system can implement zoning with negative impact where “critical habitat” provisions are not applied. Further, cumulative removal of vegetation and regenerative capacities (land area and soils) of Urban Forest is not assessed in land-use planning. A scientific study of cumulative impacts says, “*while each single land use change results in a negligible impact, the accumulation of these individual changes over time and within a landscape or region may constitute a major impact.*”^{viii} Neither state nor federal legislation considers the destructive effect of many zonings overlaying each other.

The NSW Government’s Standard Local Environment Plan (LEP) is full of unknown perils for an area of high biodiversity. Standard Zoning certainly will allow smaller blocks of land within the range of Urban Forest. It will allow more development in the very soils needing more protection, to maintain current biodiversity levels in irreplaceable Urban Forests.^{ix} Urban Forest has far greater long term economic value than construction, which excavates and trucks away the very basis of fragile flora and fauna habitats – environmentally sensitive soils. That the resulting real estate is now being sold overseas and to investors - makes zoning for development, in areas of rare Urban Forest, a highly questionable process.

The NSW planning system appears un-aware of the intrinsic value of, and the method and need for, protecting land for its delicate biodiversity. Clearly, a lack of understanding of the value of biodiversity is demonstrated by the nature and number of zonings allowed in environmentally sensitive areas (ESAs).



Blue Gum High Forest site is moonscaped by damage un-assessed under one LEP, while damage from an adjacent development is cumulatively allowed under another LEP.



Building too close to established trees is the result of urban densification in Urban Forest. The cumulative impact of inappropriate zoning is *further* tree removal.

Zoning for development is an un-recognized key threatening process for threatened species. The Planning legislation (*EP & A Act*)* genuinely fails to protect biodiversity. BioBanking (*TSC Act*) treats biodiversity protection as a financial transaction. The policy platform of the Planning Institute of Australia (PIA) fails to mention biodiversity.^x With little protection in legislation and policy, zonings for development have become key threats to rare, urban biodiversity.

In present land-use planning “sustainability” simply means catch-up, non-diverse sapling planting in remaining soils, after massive concrete footprints are made. Tellingly, a biodiversity strategy is not a gazetted instrument. It is not officially part of the land-use planning process, nor is it signed off by ministers, to *precede* the threatening process of zoning.

Media debate and public discourse of development in biodiversity rich areas. In the push to increase human population in Sydney’s North and North West, no media debate has been conducted regarding Urban Forest’s contribution to the Australian biodiversity pool in terms of the critically endangered ecological communities found in these areas. Yet Local Government Areas (LGAs) like Hornsby, Ku-ring-gai and Lane Cove are strategic wildlife corridors between national Parks.^{xi}

Examined in the media mainly in terms of dwelling numbers allocated and proposed, the unexamined attributes of Urban Forest are matters of national significance. A wealth of fauna and flora is being allowed to vanish now, from the creeping cumulative effects, of multiple zonings for development, on corridors of non-human habitat.

It is urgent to change land-use planning to protect precious urban biodiversity. Rather than displace our last Urban Forests, we should “*bring forests into the cities*”.^{xii} City public lands, open-air carparks, railway corridors and vacant urban areas should be biodiversity refuges, community gardens and green spaces, to expand rare Urban Forest for human health.

Local Council development planning directors *are equipped* to assess and report negative cumulative impact on Urban Forest. However, ecological qualification and direct responsibility, for biodiversity conservation and environment protection, are needed at director level. Policy makers and planners know that existing Urban Forest is easier to protect, than to re-forest.^{xiii}

Urban Forests are crucial. In growing cities, once Urban Forests are removed and soils excavated, making amends is virtually impossible. Bio-links and rare urban biodiversity are of national importance and future job sources. The permanent loss of biodiversity (***critical biological infrastructure***) in Urban Forest, is therefore a matter of national interest and security.

Storms, bushfires, droughts and flooding rains are removing flora and fauna habitats.^{xiv} Human development, inextricably tied to biodiversity, soils and Urban Forests, is also cumulatively removing the shared life support.^{xv}

Janet Harwood

Our Future is the Natural World

**TSC Act*- The NSW Threatened Species Conservation Act 1995.

**EPBC Act* -The Environment Protection and Biodiversity Conservation Act 1999, the Australian Government's central environmental legislation.

**EP & A Act*- The NSW Environmental Planning & Assessment Act 1979.

Endnotes.

- ⁱ UN-Habitat bi-annual State of World Cities report 2010.
- ⁱⁱ “Biodiversity Conservation: A Decision Making Context” (1996) Dr. Ann Dale and Prof Stuart Hill
- ⁱⁱⁱ “Sustaining Life How Life depends on Biodiversity” (2008) Chivian E. and Bernstein A. eds Oxford University Press.
- ^{iv} “Collapse How Societies Choose to Fail or Survive” (2005) Jared Diamond. Penguin Books.
- ^v See Policy platform of Planning Institute of Australia (PIA) and other urban projects and national urban policy.
- ^{vi} See documentary film “State of Siege” in which activist film makers Dennis and Diane Grosvenor explore the destructive phenomenon of development and the politics behind it.
- ^{vii} <http://www.legislation.nsw.gov.au/maintop/view/inforce/epi+155+2006+cd+0+N> It is noted that NSW Environmental Zone protections available have failed to protect biodiversity and pressures from human development apply forcefully: when legislative provisions to declare “critical habitat” are not applied, where protective legislation is overridden; where cumulative impacts are not assessed; where systemic flaws and gaps continue to operate, biodiversity strategies are not given the status of gazetted instruments – and Departments of Environment are subsumed and/or not afforded the authorities they require, to genuinely protect biodiversity.
- ^{viii} “Estimating the cumulative effects of development on wildlife habitat” (1998) authors DavidMTheobald, JamesRMiller and NThompsonHughes
- ^{ix} See *Environmental Baseline Study (2000)*
<http://www.kmc.nsw.gov.au/www/html/212-research-studies-papers-and-reports.asp>
- ^x See PIA website <http://www.planning.org.au/policy/policy-platform>
- ^{xi} See especially Ku-ring-gai Council’s Biodiversity Strategy Appendix 6 Biodiversity Data, page 29
[http://www.kmc.nsw.gov.au/resources/documents/Biodiversity_Strategy_May_2006_final_for_adoption1\[1\].pdf](http://www.kmc.nsw.gov.au/resources/documents/Biodiversity_Strategy_May_2006_final_for_adoption1[1].pdf)
- ^{xii} Submission to National Policy Unit *Our Cities: Building a Productive, Sustainable and Livable Future* by Our Future is the Natural World. J.Harwood.
- ^{xiii} See <http://www.fao.org/docrep/005/t1680e/T1680E01.htm> “*Planning is important because trees are very often considered as an afterthought once development has taken place, rather than being incorporated at the original design phase. An integrated approach implies the participation of many different organizations - local councils, municipal and national planning bodies, departments, etc. Systematic management entails regulated tree management; operations such as planting, pruning, and felling must all be conducted in an organized manner, at the appropriate time. This is certainly more theoretical than actual in most urban settlements (in developed as well as developing countries); it also implies a greater degree of control over, or at least information about, all trees on all land types than usually exists.*”
- The FAO experience in “Urban Forestry” clearly indicates that more action is needed to protect existing Urban Forests (as defined). Zoning for protection of Biodiversity in Urban Forests (as defined), urgently needs to be specifically instituted through Planning legislation (*EP&A Act*). Local biodiversity strategies (*TSC Act*) need to be properly signed off by ministers and gazetted. Only the powerful land-use planning legislation can ensure that “critical habitat” in Urban Forests is not lost. Protective zoning for Urban Forest(as defined) and the complicating and devastating effects of un-assessed cumulative environmental impacts need to be immediately considered in Planning Legislation (*EP&A Act*).
- ^{xiv} “*The Future of the Wild Radical Conservation for a Crowded World*” . (2006) J.Adams. Beacon Press Boston.
- ^{xv} The basis for natural terrestrial habitats - *Fertile soils*: “*An estimated four million bacterial species occur in a ton of fertile soil, comprising ten billion or so organisms to each gram of weight. Although invisible, the collectivity of these organisms in soils and elsewhere is vital to our continued existence. Similarly, while a few thousands of the millions of insect species in the world afflict us as pests and disease carriers, we depend on the rest for our very lives. If beneficial insects did not flourish, most of the land ecosystems of the world would collapse and a good part of humanity would perish with them..... For many reasons, not least our own well being, we need to take care of the rest of life.*”
- E. O. Wilson Foreword in “*Sustaining Life How Life depends on Biodiversity*” Chivian E. and Bernstein A. eds. (2008) for The United Nations Programme.

IMPORTANT QUESTIONS

- Why are Urban Forests being allowed to disappear?**
Why are protective legislative provisions over-ridden?
Why is “critical habitat” not declared more rigorously?
Is biodiversity conservation a source of future employment?
Should Urban Forest areas be given a new category of protective rezoning?
When will cumulative impacts be made to matter to protect biodiversity through planning legislation?

Janet Harwood janetsh@optusnet.com.au

Insert with Newsletter June 2011 Friends of Ku-ring-gai Environment Inc (FOKE) P. O. Box 403 Killara 2071. www.foke.org.au