

Date: 20 – 12 – 2011

**From: Marion Riordan.**

**Submission** – Kings Forest Development Application number :08\_0194

**Attention:** Director Metropolitan and Regional Projects North

**Re:** Environmental Management Plan For Kings Forest Estate

Dear Sir / Madam,

Regarding the above I would like to draw your attention to possible revision of the Environmental Assessment (EA) due to the potentially important impact on matters of National Environmental Significance (NES).

The Director General's requirements pertaining to this:

**Requirement 5:** Consistency of this project with Environment Planning and Assessment Act 1979

**Requirement 6:** Consistency of project with matters of NES – (Environment Protection Act and Biodiversity Act 1999)

**Key Issues:**

1. The current KPoM fails in its aim of protecting koalas
2. Retaining and enhancing core koala habitat must be an immediate priority
3. Roads as currently planned present a high risk to wildlife including koalas and other threatened and endangered species
4. The current plans for the golf course present a threat to threatened and endangered species

1. The measures proposed in the current KPoM are inadequate to offset the impact of the development on existing and future koala populations. The KPoM relies solely upon a koala-proof fence to mitigate dog attacks. However, the fence has gaps for vehicle access, where cattle grids are positioned to prevent koalas leaving their protected zones. But these grids have not been tested or proven to prevent *access by dogs into koala protection zones*. Furthermore, fencing breaks down over time and this development offers no maintenance provisions.

**Fencing is a good method to separate koalas from vehicles but is inadequate as a way to protect koalas from dogs.**

Regarding the management of dogs to prevent koala attacks Govt senate committees have been informed that there is “ little evidence that management responses to address dog attacks on koalas has been effective thus far “ (Threatened Species Scientific Committee 2009)

Various dog management practices that are generally practised include the following:

- a Prohibit certain dog breeds
- b Limit dog numbers
- c Require dusk to dawn housing

The current proposed KPoM for this application fails to do any of these instead it relies *on a single line of defence – a fence – intending to keep dogs out and keep koalas within its boundaries.*

Regarding koala attacks by dogs, The Friends of the Koala Inc. emphatically state that “all dogs impose a deadly threat to koalas” -irrespective of size.

Furthermore: - Scientific evidence shows that any dog bite can kill koalas  
- Dog saliva has been proven to be a deadly toxin to koalas

All of this reinforces the point made by the Tweed Shire Council in 2009 (Reports – Item 9) that **'dogs and koalas must not mix'**.

If this proposal was truly concerned for the continued survival of koalas on and near the property it would **ban the ownership of pet dogs altogether**.

Such an approach has been applied successfully at Koala Beach Estate – Pottsville. It was equally close to sensitive koala habitat and applied such a ban **from the outset** which is the only way such a measure can be reinforced.

2. At present this proposal transfers several hectares of land into zone 7(a) – environmental protection – included in these areas are 'core koala habitat'. But these koala habitat areas are noticeably dissected by the proposed development. Koalas instinctively roam between their areas and **must be allowed to roam in safety if they are to survive**. This proposal plans to augment their habitat by planting koala food (& other) trees to fill gaps and create contiguous corridors of protected land within and through the estate. If this is to be effective the following MUST occur:

- No koala feed trees to be felled, no matter where they are.
- Owing to the critical time left for the remaining 144 Tweed Coast koalas the planned feed tree planting needs to proceed immediately for it to be effective.
- These protected corridor zones MUST be suitably fenced to separate koalas and other wildlife from human activities.

3. Under the present plan, specific road design is inadequate for the protection of koalas and their safe passage across habitat areas.

Under the current plan, two-lane roads are designed to go through core koala habitat and environmental protection zones. If the developer is to comply with the aims of protecting koalas and maintaining their safe passage between habitat areas the following needs to apply:

- No higher than 40 kph speed limits
- Speed humps need to be placed at least every hundred metres
- Speed cameras are need to enforce prescribed speed limits
- Electronic traffic speed recorder is needed

4. The golf course management plan is not consistent with the KPoM and the Threatened Species Management Plan.

- Under the plan current koala migration paths go through the centre of the golf course - this is inconsistent with the KPoM and the Threatened Species Management Plan.
- Golf courses are well known corridors for feral animals and, therefore, a danger to koalas and other wildlife.
- Koalas and wildlife crossing golf courses must contend with unrestricted human sport activity.
- Koalas and other wildlife are under threat from inhaling pesticide fumes from poisons used on golf courses.

Conclusion:

Team Koala Inc. concludes that this development will have a negative impact on matters of National Environmental Significance and anticipates that the Director General will require the proponent to revise their EA to address these important matters.

