

Re: Application No. 08_0194 MOD 4

I object to this application because:

1. The applicant has provided insufficient evidence that they have consulted adequately with all stakeholders. For example, with regard to consultation with Tweed Shire Council, I can find only mention that there were “meetings with ... Tweed Shire Council”. Evidence of adequate consultation would include details such as attendees of meetings and all points of agreement or disagreement at those meetings.
2. The applicant has stated that some areas previously designated to be compensatory habitat are “not suitable for compensatory habitat as already contains Secondary Koala habitat” (Figure 3 of the application). Primary food trees should be planted in those areas if it could enhance their value to koalas. Enhancement of those areas by adding primary food trees might be important to the survival of the koalas impacted by the proposed development.
3. The application says a “*fully revegetated corridor (minimum 50 metres wide) shall be provided between the existing central east-west wildlife corridor and the existing native vegetation separating Precinct 9 and 10 from Precinct 11 (FIGURE 1F)*”, but this new corridor does not extend far enough east to connect with the existing central east-west corridor. If the revegetated corridor does not connect fully with the existing central east-west corridor, koalas might not be able to move sufficiently between the associated patches of habitat. Also, the applicant has not cited evidence that 50 m is wide enough for koalas to readily move through the corridor.
4. The modifications to fencing and underpasses are not justified adequately. For example, the revised Koala Plan of Management (KPOM) says the report, *Koala Monitoring – Final Report. Skyline Road Upgrade, Lismore 2011*, produced by M. Hopkins and S. Phillips in 2009 (Biolink Pty Ltd, Uki, NSW), provides justification for an exclusion approach. This report is not available online, so it should be included with the developer’s application to allow review of the reasoning behind the report’s recommendation. This is important because, for example, the authors’ recommendation might have arisen from site-specific characteristics that don’t apply to the Kings Forest development. If Hopkins and Phillips do not provide consent for inclusion of their work with the developer’s application, this should be stated in the application, together with the authors’ reasons for withholding consent.
5. Koalas might suffer from impacts of “preliminary works” due to inadequate provisions for environmental management during those works.
6. I could not find a clear statement on timing for offset habitat planting on the development site. Offset planting should occur long enough before clearing of existing habitat, so that koalas have new habitat areas, and new corridors, to use when clearing occurs. The offset plantings will need some amount of time to grow so they can be used koalas when existing habitat is cleared.
7. I believe that the many interested parties will be unable to adequately review the requested modifications because many details appear to be buried deep within the documentation submitted with the application. I found it very difficult to find and review all details of the requested modifications, and I therefore have little confidence that I have covered all potential issues arising from them. Ability to review the requested modifications would be improved by greater clarity in Section 1.1 Summary of Modifications. For example, it says the

application seeks approval to “amend the timing” for construction of infrastructure for koala management. If the timing is to be delayed, the Summary should say “delay the timing”, not “amend the timing”, and the change in timing should be quantified. All proposed modifications, and their impacts on koalas, should be stated clearly and explicitly in the Summary.