



Caldera Environment Centre Inc.

FOUR QUEEN STREET MURWILLUMBAH NSW 2484

PO BOX 5090 SOUTH MURWILLUMBAH NSW 2484

PH: 02 66 721 121

8th August 2017

Attention: The Secretary of the NSW Departments of Planning & Environment

MODIFICATION TO KINGS FOREST APPROVAL NO. 08_0194 (MOD4)

Caldera Environment Centre (CEC) has been established in Tweed Shire for the past 26 years to promote the protection of the environment. The Tweed Coast has an endangered population of Koalas which require sensible and strategic management to ensure their survival. Our members are involved in the Tweed Coast Koala Management Committee, caring for sick and injured Koalas, active protection of Koala habitat and the planting and restoration of Tweed Coast Koala habitat. Over the past years the development of Kings Forest has been the subject of CEC campaigns.

Caldera Environment Centre (CEC) objects to the proposed amendment to the Kings Forest Koala Plan of Management and project approval.

Our main concerns are detailed below.

There has been significant input by way of funding to manage and restore Koala habitat on the Tweed Coast. The large Koala Connections project of \$1.5M was dedicated to restoring habitat and reducing threats. Tweed Shire Council has recently received Federal and State funding for Tweed Coast Koala habitat. All levels of government and the community are contributing towards protection of the Endangered Tweed Coast Koala Population which will be negated by this proposed modification which will reduce habitat commitments and increase threats if it is approved.

The proposal to remove the requirement to create 27ha of Koala habitat in Cudgen Nature Reserve, reduce the east – west corridor and offsetting in areas that already have native vegetation or are too small to be of benefit to Koala has no justification. The Cudgen Nature Reserve offset proposal is an ideal location as previous plantings on ex banana land are now providing habitat trees for Koalas. CEC disagree with Leda in that there is no nexus between Kings Forest and Cudgen Nature Reserve proposed planting area. There is ex banana land remaining that is ideal for planting and would complement the areas already planted and used by Koalas. Community groups such as Friends of Cudgen Nature Reserve have volunteered in the area for many years and have encouraged and supported projects by WetlandCare and Council in Cudgen Nature Reserve.

In the original approval, the east-west corridor was proposed to be revegetated and generally 100m wide and connect to habitat at the eastern and western extremes. The proposal intent is to reduce the



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east-west fauna corridor to 50m in width, reduce the length resulting in a non-continuous habitat link and purpose as a corridor.

The original Koala Plan of Management and associated offset package approved by the State Government as part of the Concept Plan recognised the significant impact the Kings Forest development would have on the local Koala population, through both direct impacts like vegetation clearing and loss of habitat and indirect impacts like increased risk of dog attack and car strike associated with the development. There is no need to change this Plan particularly in the light that there is proposed additional clearing of 8ha Koala habitat.

How can Leda justify clearing additional Koala habitat while reducing the offset area?

Proposed delays to create Koala habitat are not supported. There has been great success with plantings on the Tweed Coast through the Koala Connections project, Environmental Trust projects and funding from Tweed Shire Council. Plantings at locations such as Pottsville Wetlands, Pottsville Environment Park and Cudgen Nature Reserve, all located to the south of Kings Forest, have been utilised by Koalas within a three-year period. The quicker that Leda implement their requirement to plant the better as this action will benefit the chances of survival of Tweed Coast Koalas.

There should be no double dipping by having on site Koala habitat offsets. There is already a commitment to restore these areas. The intent should be to create primary Koala habitat with primary food trees the dominant species. There is no sensible reason to create secondary habitat when economically it would cost the same as creating primary habitat. The plantings should be modelled on those that have already proved successful in the plantings to the sites to the south. Generally, two species of the primary food trees are selected, depending on the topography and soils on site, and are complemented by additional local species suited to that plant community.

The reduction of threats by vehicles and dogs has been reduced by removing permanent fencing along roads in the south west and removal of fauna underpasses. There has been lengthy discussion on the placement of fencing and underpasses prior to the Concept Plan and now Leda are proposing a change. Grids have not been proven to eliminate dogs and it is unknown if Koalas may also cross them. These changes will result in Koalas being exposed to vehicle strike and dog attack.

The “commencement” should not be redefined. Offset measures should be established prior to any removal of existing Koala habitat.

The proposed modification is a serious step backwards from the original planning and has no valid justification for the proposed changes.



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Why is it so difficult for Leda to put in place a development that considers environmental issues and the plight of the endangered Koala population? The development could be set up as a model for Koala conservation, which would be supported by the community.

We support the Tweed Shire Council proposal for an independent consultant to review the offsetting and habitat restoration obligations and prepare an integrated environmental plan of management. See Page 121 of report to Council.

CEC does not support the proposed changes to the Kings Forest Koala Plan of Management. The State approval is sound and if the will was there could result in a satisfactory outcome to conserve Tweed Coast Koalas into the future.

Yours sincerely

Cynthia Brook
Secretary
Caldera Environment Centre