

habitat must occur in a koala activity area or linkage area within the Tweed Coast Koala Plan of Management TCKPoM.

With regard to the TSC “substantive concerns” around other management plans and management of existing koala habitat we would like to comment on the following revision suggested for this KPoM:

The revised KPoM (May 2017) acknowledges that thirteen (13) relevant management plans were completed for the Kings Forest Stage 1 Project Application and approved under Project Approval 08_0194 (Section 1.6). These management plans are listed and it is noted that they should be considered in conjunction with the revised KPoM.

However, it is also noted that there has been a significant amount of work completed subsequent to their approval, e.g. pre and post development groundwater assessments (G&S2013 and 2014), and aspects of these management plans will therefore need to be amended accordingly (as required by Condition 39 of the MP 08_0194). Furthermore, it is acknowledged that the revision of the relevant Management Plans must not be inconsistent with the revised KPoM, which addresses the requirements of Condition C2 of the Concept Plan Approval 06_0318

and Condition 39 of the MP 08_0194 (as modified).

We note that this wording does not guarantee that ALL environment management plans will be completed and approved **BEFORE works, of any sort, commence.**

We stress that this is essential for the success of environmental management including koala habitat management for the Kings Forest site.

In particular a “Bushfire Management Plan” must be established before any plantings or earthworks go ahead. Access roads for fire fighting and many other bushfire management requisites will need to be actioned *in conjunction* with koala habitat management. Other management plans will also come into play as this occurs. The establishment of koala habitat areas CANNOT be done independently of these other multiple “Plans of Management”