

We refer to Tweed Shire Council (TSC) comments (19 May 2017) and its “more substantive concerns” regarding the need to provide “primary koala habitat”.

The planting schedule detailed in this current revised KPoM is commendable for requiring “70% primary food trees” in the canopy (of areas of primary koala habitat). However, it needs to ensure that areas of “secondary koala habitat” retain a “**30% primary koala food tree**” ratio in the canopy. This contradicts the current wording of this revision which states “**between 10% and 30% primary food trees**” in the canopy.

Even more importantly the planting schedule in this KPoM aims to plant trees at a density of **1 one tree every 25 m2**. This density is totally inadequate for the establishment of koala habitat areas. The accepted density for such plantings is **1 one tree for every 9 nine square meters**. This is the density used throughout the “koala corridors” project on the Tweed and in the TSC KPoM recommendations. At a density of 1 tree/25 m2 it is likely that weeds and shrubs will swamp the growth of the trees. It will create a serious weed control problem and is unlikely to reach the final targets for establishment of koala habitat with the necessary canopy percentage and density required by the consent conditions.

With regard to the KPoM amendment to Condition 45(1) and plantings that are not onsite it is encouraging to see the condition regarding “restoration and planting of 27 ha of Koala habitat OFFSITE” is to be retained. However, we note that the final wording of this revision does not specify WHERE this compensatory habitat is to occur. It is simply referred to as “*an alternate site to the satisfaction of the secretary*” of Department of Planning and Environment (DoPE). Admittedly the relevant mapping depicts the areas as within Cudgen Nature Reserve (NR) which is the desired and expected location of this offsite offset habitat. However this revised wording leaves options open for a very unsatisfactory outcome.

We would like to stress our disapproval of the current wording of this revision. We recommend that should the mapped 27ha not be suitable or viable after consultation and ground research of the Cudgen NR site an alternative site be found **within the Tweed Coast area**. Furthermore we recommend that this