

From: [REDACTED]
To: [IPCN Enquiries Mailbox](#)
Subject: Modification to Kings Forest Residential Subdivision Koala Plan of Management (MOD 4)
Date: Monday, 18 March 2019 8:04:15 AM

Independent Planning Commission NSW

Thank you for the opportunity to make a public submission on the above project. I wish to raise a number of issues for consideration by Independent Planning Commission (IPC) before approving the modified Koala Plan of Management (KPoM). I am concerned that the following matters have not been fully addressed or are unclear and as such I make several recommendations ;

1. KPoM to ensure compensatory planting of koala food trees is carried out before commencement of proposed development including removal of any vegetation
2. There should be no fencing which will result in disruption or blocking of koala access to their habitat areas e.g. no fencing around proposed golf course. This is an important consideration also in case of a bushfire and the need for an escape route for koalas
3. Effective preventative measures should be in place to keep dogs from accessing koalas and koala corridors at all times
4. Proponent should obtain required agreement(s)/approvals from relevant agencies i.e OEH for planting koala food trees, prior to commencement of project works (e.g Cudgen Nature Reserve) and other identified compensatory areas. OEH indicated very recently that they are still waiting to hear from the proponent
5. Adequate koala (and other native fauna) crossings (underpasses) should be clearly identified for all areas that will cut off koala corridors between their habitat areas/zones, and in place prior to haulage roads being used when construction commences
6. Ensure there is adequate integration of the KPoM with the other fauna and flora management plans
7. There should be independent Fauna Spotter Catchers employed during the construction phase.

I believe that this large scale project will have a significant adverse impact on the already threatened koala population in the area, and therefore it is critical that strict adherence to the KPoM and associated EMP's is undertaken should approval be given. It is also clear to me that high level protection of this Australian icon is intended in numerous State and Federal laws including:

a. EPBC Act

In March 2012, the koala was listed as a Vulnerable species under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 throughout Queensland, New South Wales and the Australian Capital Territory.

b. New South Wales Threatened Species Conservation Act 1995

In April 2016, the koala population between the Tweed and Brunswick Rivers east of the Pacific Highway was listed as an Endangered Population under the New South Wales Threatened Species Conservation Act 1995.

c. SEPP 44 Koala Habitat and Protection requirements

d. Tweed Coast Comprehensive Koala Plan of Management (2015).

e. Biodiversity Conservation Act 2016 (NSW)

I am also concerned with the reluctance by the proponent to consult, apply and obtain the required approvals from the relevant agencies.

Thank you for your consideration.

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