



REPLY TO BALLINA OFFICE

File: 97038/Lw1

25<sup>th</sup> September 2017

LEDA MANORSTEAD 28 PTY LTD  
PO Box 1914  
Surfers Paradise Qld 4217

Attention: Natasha Harras

Dear Natasha

**RE: Cobaki Residential Community Concept Plan - MOD 9**

I refer to an email sent to yourself on Thursday 7 September 2017 by Mr Reg Van Rij (Leda Manorstead Pty Ltd). In this email Mr Van Rij indicated that he would provide a further response to an Office of Environment & Heritage (OEH) letter sent to you and dated 11 August 2017.

James Warren & Associates Pty Ltd have been engaged by Leda Manorstead Pty Ltd to provide this further response to a portion of the OEH letter. Attachment 1 of the OEH letter contains an assessment of a proposed Modification to the Cobaki Residential Community Concept Plan (MOD 9).

The OEH comments and James Warren & Associates Responses are as follows:

OEH COMMENTS	JAMES WARREN & ASSOCIATES RESPONSES
<i>The OEH understands that the proponent has now undertaken recent (2016) biobanking plots, prepared a Biodiversity Assessment Report (BAR), and provided biobanking calculations for the 3.8 hectare of swamp sclerophyll forest. The submitted biobanking calculations require 132 ecosystem credits of swamp sclerophyll forest (i.e. 60 ecosystem credits less than previously required), and an additional 49 species credits for the Little Bent-wing bat and 49 species credits for the Wallum Froglet.</i>	It is acknowledged that the JWA BAR report correctly advises that 128 ecosystem credits are required
<i>The submitted biobanking calculations are inconsistent with the JWA BAR which states that</i>	



<p><i>128 ecosystem credits are required in addition to the species credits.</i></p>	
<p><i>The BAR has then converted the 128 ecosystem credits to hectares using the biodiversity certification credit converter. This has been determined by the applicant to be 14 ha in total.</i></p> <p><i>The OEH understands that the credit converter was used by Umwelt to provide a guide as to the number of hectares required for the offsets, but the credit converter is a tool developed for biodiversity certification and uses a lower offset ratio than biobanking for offset calculations due to the strategic nature of biodiversity certification projects. The OEH Biocertification website states that "When there is a shortfall of credits for conservation measures in a biodiversity certification proposal, the biodiversity certification <b>credit converter</b> may be used to convert the quantity of ecosystem or species credits into hectares of land and then into an amount for a financial contribution".</i></p> <p>The credit converter does not need to be used for the Cobaki proposal, as a credit requirement will be sufficient to identify a suitable offset.</p>	<p>JWA used the credit converter to maintain consistency with the NSW Department of Planning &amp; Environment (Umwelt) report. It is acknowledged that the credit converter does not need to be used and that it is sufficient to identify the number of ecosystem credits required to identify a suitable offset.</p>

Yours faithfully  
JAMES WARREN & ASSOCIATES

James Warren  
Managing Director