

REPLY TO: BALLINA OFFICE

Ref: AM/97038/Lw1

28th September 2018

AE Design Partnership
3/780 Darling Street
Rozelle NSW 2039

Attention: Danica Canozza

Dear Danica,

RE: Cobaki Estate Residential Development - Response to MP 06_0316 MOD 8 Application

I refer to the Secretary's Environmental Assessment Requirements (SEARs) in respect of an application to modify the Cobaki Estate Concept Plan (MP 06_0316 Mod 8). It is understood that the modification application includes:

- A reduction of approved location for the town centre in Precinct 5 including:
 - Northern portion of approved town centre (from connector road) replaced with residential uses;
 - Retain southern portion of approved town centre (from connector road);
- Amendments to increase building heights in the following locations within Precincts 5, 15 and 17:
 - Precinct 5: adjoining ridgeline/knoll in land zoned Environmental Protection Area to the north;
 - Precinct 15: adjoining ridgeline/knoll in land zoned Environmental Protection Area to the west; and
 - Precinct 17: adjoining ridgeline/knoll in land zoned Environmental Protection Area to the west.

The SEARs note that the Environmental Assessment submitted in support of the application will need to demonstrate that the proposed modification has limited environmental impacts beyond those already assessed for the Concept Plan Approval (MP 06_0316). In this regard

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responses are provided to the relevant SEAR's in the following sections. In preparing my response I have reviewed the following documentation:

1. Secretary's Environmental Assessment Requirements (SEARs) issued to the applicant (Leda Manorstead Pty Ltd) in December 2017;
2. Updated Cobaki Estate concept plans prepared by AE Design Partnership (dated 23rd May 2018);
3. Response to SEARs relating to Flooding, Stormwater and Utilities issues prepared by Arcadis (dated 25th September 2018);
4. Response to SEARs relating to Traffic and Accessibility issues prepared by Bitzios Consulting (dated 28th September 2018); and
5. Response to SEARs relating to Bushfire issues prepared by Bushfire Certifiers (dated 27th September 2018).

9, dot point 3:

- **Consider consequences for, and incorporate actions to, complement the ongoing management of the saltmarsh rehabilitation areas located within the development precinct.**

The Concept Plan Approval (MP 06_0316) included Environmental Protection Areas covering approximately 194 ha of land and providing for the rehabilitation of threatened species habitat and endangered ecological communities across the site. The approved documents included the Revised Saltmarsh Rehabilitation Plan prepared by James Warren & Associated P/L, October 2010.

It is understood that the modification application (MP 06_0316 Mod 8) does not propose any additional impacts outside of the approved development footprint, or any changes to the retention and management of vegetation and habitat areas within designated Environmental Protection Zones. There are no proposed changes to the development footprint or yield. The saltmarsh communities occurring within Environmental Protection Areas of the site will continue to be managed as directed by the management plans prepared in accordance with relevant consent conditions. It is therefore not considered that the proposal will result in any additional impacts on the saltmarsh rehabilitation areas on the site.

11. Assess any additional biodiversity impacts associated with the proposal, including any additional impacts on adjoining areas. Management and mitigation actions shall be developed to address any identified impacts of the proposal on biodiversity.

As discussed above, the Concept Plan Approval (MP 06_0316) included Environmental Protection Areas covering approximately 194 ha of land and providing for the rehabilitation of threatened species habitat and endangered ecological communities across the site. In addition to the Revised Saltmarsh Rehabilitation Plan prepared by James Warren & Associated P/L, October 2010 the approved documents included:

- Revised Site Regeneration and Revegetation Plan prepared by James Warren & Associated P/L, October 2010;
- Revised Freshwater Wetland Rehabilitation Plan prepared by James Warren & Associated P/L, October 2010.

Furthermore, the conditions of approval required the preparation of:

- detailed regeneration and revegetation plans for each Rehabilitation and Management Precinct as detailed in the Site Regeneration and Revegetation Plan (SRRP) - Condition C4(3);
- stage-specific Buffer Management Plans as per the Overview Buffer Management Plan - Cobaki Lakes - Preferred Project Report (James Warren & Associates P/L, 2009) - Condition C4(4); and
- updates to the Flora and Fauna Monitoring Report in accordance with the draft outline to be approved by the Director-General - Condition C4(5).

As the modification application (MP 06_0316 Mod 8) does not propose any additional impacts outside of the approved development footprint, any changes to the development footprint or yield, or any changes to the retention and management of vegetation and habitat areas within designated Environmental Protection Zones, it is not considered that the proposal will result in any additional impacts on the biodiversity values of the site.

Please don't hesitate to contact me if you require any further information.

Yours faithfully,
JWA Pty Ltd



Adam McArthur
Director / Principal Ecologist