

Preliminary Documentation Submissions Response Memo

The Trails Residential Development, Redland Bay,
Queensland (EPBC 2021/9047)

27 February 2026

Ref 10725 E

Pursuant to Section 95A(3) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and direction to publish from the Department of Climate Change, Energy, the Environment and Water (DCCEEW), SRCP (Shoreline) Pty Ltd commenced the public notification process for The Trails Residential Development, Redland Bay, Queensland (EPBC 2021/9047).

Public comments were invited on The Trails Residential Development, Redland Bay, Queensland, EPBC Act Preliminary Documentation Report from the 19th January to the 9th February 2026. A total of 35 submissions were received via email during this period. To assist in providing responses to the number of submissions received, submissions have been individually numbered from 1 to 35 and categorised into distinct themes based on the content in the submissions. A single submission may overlap multiple themes. A summary of these themes and the total number of submissions is provided in **Table 1**.

One submission was an enquiry from a journalist (024) and another was a request for documents (019). Several submissions contained identical templates. Submissions grouped in this regard include 1) Submissions 004, 021 and 027, 2) Submissions 016, 017 and 018, 3) Submissions 002 and 030, and 4) Submissions 006 and 035. Two submissions (ID 005 009) were received which cited a separate development and approval reference. It was confirmed in reviewing these that none of the content within these submissions was directed at The Trails Residential Development. As such, these have not been addressed in the below response package. It is noted three submissions were received outside the publication timeframe (033, 034 and 035), however, have been included for department certainty.

A large number of submissions identified relatively high-level concerns with respect to the loss of critical habitat for the koala and greater glider (theme 1) and impacts to wildlife generally (theme 3). Similarly, over half were generally opposed to the clearing of vegetation for land development (theme 4). Due to the high level of similarity between submissions, these submissions have been jointly addressed where possible through the grouping into themes.

Please note that submission responses have been prepared in the context of the EPBC Act requirements. As such, comments have been acknowledged but not responded to in detail where they fall outside of the scope of assessment under the Act.



Table 1: Submissions received and themes

Theme No.	Theme	Submission ID	Number of submissions
1	Impacts on koala and greater glider habitat	001, 002, 004, 006, 007, 008, 011, 014, 021, 022, 027, 028, 029, 030, 035	15
2	Offset site	001, 004, 006, 011, 015, 025, 027, 029, 031, 035	10
3	Impacts on wildlife and habitat generally including displacement and loss of habitat	001, 002, 003, 005, 011, 014, 015, 020, 026, 028, 031, 034	12
4	General opposition to land clearing for development	003, 005, 007, 008, 013, 014, 016, 017, 018, 020, 022, 023, 025, 026, 028, 030, 031, 033, 034	19
5	Design and planning intent	004, 006, 011, 021, 027, 035	6
6	Wedgetail Eagle / Raptor Nest	004, 011, 012, 021, 027, 028, 029	7
7	Ecosystem services	015	1
8	Modern sewerage system / "night soil" system	032	1



Response to Themes 1 and 4

A total of 15 submissions opposed the development on the basis of the proposed impacts to critical koala and greater glider habitat and 19 on the basis of clearing of vegetation to facilitate development.

It is acknowledged that the koala and greater glider and their habitat are listed as threatened at all levels of Government in South East Queensland, and that under the action 20.61 hectares (ha) of vegetation defined by DCCEEW as critical habitat for the koala and 15.28 ha of vegetation defined as critical habitat for the greater glider will be impacted.

While the site contains potential values for these species to occur, the on-site vegetation values have been fragmented, disturbed and historically cleared to support pastoral practices. Habitat for the koala is limited to scattered eucalypt trees and patchy regrowth (refer **PD Part A Section 4.3.1** and **Plan A6**). Clearing of vegetation is limited as part of this proposal, with development impacts primarily located within existing cleared paddock.

A range of field surveys were completed across and adjoining the site surveys to identify potential presence and habitat for these species included spotlighting, Spot Assessment Technique (SAT) surveys, BioCondition transects and several days of tree plotting whereby individual trees were located and assessed (refer **PD Part A Section 3.2** for field survey details). Additionally, no evidence of koala or greater glider was detected on-site or within the 100 metre (m) buffer area within the Bayview Conservation Area during targeted field surveys. While the potential for these species to occur is acknowledged through the presence of potential habitat values, the potential for occurrence and evidenced utilisation is low.

The proposal includes avoidance measures to reduce immediate and long-term impacts on the koala and greater glider. A 100 m-wide corridor spanning the width of the site will be delivered which will provide ongoing fauna connectivity to the Bayview Conservation Area and adjoining corridor to the east under approved project EPBC 2021/9052 (refer **PD Part A Section 4.1 and 5.3.1** and **Plan A26**).

Notably, impacts to habitat critical to the survival of the koala and greater glider due to the proposed action are to be offset as per the EPBC Act Environmental Offsets Policy and agreed with DCCEEW. As per PD Part A Section 6, an environmental offset is to be delivered in partnership with Koala Farmland Fund (KFF). An agreement has been made between SRCP (Shoreline) Pty Ltd and KFF regarding the offset land within the Little Kipper Creek Offset Property. The 82.21 offset area proposed to compensate for impacts to critical habitat under this proposal is located within the 821-ha offset property which will broadly deliver offsets for a range of species including the koala and greater glider. Management of this offset will be in accordance with the Offset Area Management Plan included at **PD Part A Attachment A9**.

It is noted The Trails Residential Development, Redland Bay, Queensland, has been approved by Redland City Council via a Preliminary Approval (MCU22/0013) (refer **PD Part A Section 2.4.3**). Importantly, the action proposes to develop relatively poor quality and fragmented habitat values (refer **PD Part A Section 4.4**), although it is acknowledged to meet critical habitat criteria. Under the circumstances, the proposal to offset impacts as a result of the action via an agreement with KFF will provide measurable value to the koala during the course of the offset program implementation and is considered in keeping with the intent of the EPBC Act Environmental Offsets Policy.

Response to Theme 2

A total of 10 submissions cited the distance of the offset site to the development site as an issue with commentary ranging from high-level statements to specific concerns regarding factors such as population dynamics and climate change. One of these comments is provided below (submission ID 006).



There have been many scientific studies that show the genetic uniqueness of the Koala Coast koala population.¹ “Structure” analysis shows Koala Coast koala populations are reproductively isolated and genetically distinct from koalas in the rest of South East Queensland. By any measure, the Koala Coast koala subpopulation have been critically endangered since the disastrous decline in reports in 2019.²

Allowing an offset located 105.8 klms from the development site, at Biarra in Somerset Regional Council, is completely unacceptable and of no benefit to Redland Koalas that will be impacted by the proposed development.

Summer temperatures in the proposed offset site are 2 degrees hotter than those in Mount Cotton weather station near the Trails site. Esk Summer (Dec-Feb): Highs often exceed 30°C, with mean maximums around 31°C. The Mount Cotton mean is 29°C.

Rainfall is also significantly less in the Esk than in Mount Cotton. This is significant in the era of Climate Change. There are many studies that show the future koala range to be moving eastward, not westward.³ Professor Frank Carrick, offered this critique of the offset system in 2019:

Much of the additional areas proposed for protection are ‘a move to the West’ –an attempt to abandon the coastal areas that support high density Koala populations in return for areas which much lower habitat value for Koalas on the basis of some superficial ideology that ‘bigger is always better’ –it has to be said that the areas now proposed for protection are not only lower value to Koalas but also lower value to developers. A lose (for Koalas) / win (for developers) proposition!⁴

Extracts from Submission ID 006

The offset site has been approved by DCCEEW as part of the assessment process. The offset was assessed closely by DCCEEW and factors such as the current and potential future utilisation of the offset site by koalas was considered.

While the above comment is acknowledged in that different populations of koala demonstrate differing trends in population dynamics and decline, the proposed impact site specifically was not demonstrated to show any utilisation by koalas during ecological surveys undertaken from 2021 to 2024 (refer **PD Part A Section 3.2.2**), therefore the impact of the development on the Koala Coast population is considered to be low relative to impacts to highly utilised and intact vegetation. Additionally, the provision of an ecological corridor within the development site will mitigate potential impacts through the retention and reinstatement of habitat.

While it is preferred to locate an offset site as close as possible to the impact site to mitigate impacts on the local population, this is not always possible due to conflicts with planning intent, nor is it specifically required under the EPBC Act Environmental Offsets Policy. It is noted that in the first phase of sourcing an offset site, the proponent explored the potential for a nearby land area within Redland Bay to be used as the offset area, however, initial assessments indicated it was not large enough to meet the minimum offset requirements, thereby requiring the proponent to identify an alternative area that would meet the DCCEEW's offset requirements.

The offset, as required under the EPBC Act Environmental Offsets Policy, will compensate for impacts to the koala *Phascolarctos cinereus* (combined populations of Queensland, New South Wales and the Australian Capital Territory) through the reinstatement of habitat values and reduction of threats. Notably, the offset site sits within the same sub-bioregion as the impact site (Moreton Basin) and supports Regional Ecosystems from the same bioregion that are considered ideal habitat for the koala. Additionally, a koala individual was recorded within the proposed offset area, indicating the potential for direct benefits through implementation of the offset program.



The offset proposal demonstrates how measurable increases in habitat value for the species can be achieved (refer **PD Part A Attachment A9**). Notably, the 82.21 ha offset area is part of a broader offset property totalling 821 ha which will deliver offsets for a range of species including the koala and greater glider. The location of the offset within the broader offset property that contains multiple approved EPBC Act offsets will provide added benefit to the koala and local population through a coordinated and cumulative offset approach and outcome.

Response to Theme 3

A total of 12 submissions received cited impacts on wildlife and habitat generally as a result of the development as a point of concern, referencing impacts such as displacement and loss of habitat.

Fragmented habitat values which provide overall limited value for wildlife are proposed to be cleared to support the development. The proposal provides a range of avoidance and mitigation measures to reduce impacts on wildlife generally, summarised as follows:

1. The location of the development with an existing fragmented landscape adjoining approved development means that higher value habitats can be retained and consolidated elsewhere.
2. A range of management plans including a Vegetation Clearing and Management Plan (VC&MP), Fauna Management Plan (FMP), Wildlife Movement Plan (WMP) and Rehabilitation Management Plan (RMP) will be implemented as part of the development.
 - a. The VC&MP and FMP will be implemented during the clearing phase to mitigate potential impacts during clearing. The documentation includes information on clearing protocols and specific protocols for fauna spotter catchers and contractors to implement during clearing. The location of the site adjacent to retained habitat values within the Bayview Conservation Area will provide an area of refuge for fauna where present during clearing works to move into during clearing, reducing the potential for impacts through interactions with roads. Clearing direction on the VC&MP requires clearing in an east to west direction to allow fauna to escape into the adjoining refuge.
 - b. The WMP and RMP provide details on the retention, rehabilitation and fauna sensitive design features to be implemented as part of the project. Specific outcomes of these plans include:
 - i. the creation of habitat within the functional wildlife corridor through rehabilitation plantings and weed management,
 - ii. construction of a full-size fauna culvert at the eastern collector road to allow for unimpeded and safe movement to the corridor to the east,
 - iii. installation of koala exclusion fencing and koala refuge poles around the perimeter of the development footprint to prevent fauna from accessing development from the Bayview Conservation Area, and
 - iv. installation of koala awareness and conservation area signage to promote awareness of wildlife.

Refer to **PD Part A Attachments A4 to A6** for preliminary versions of these plans.

Response to Theme 5

A total of six submissions cited development design, planning intent and avoidance as a concern.

Extracts of specific submissions (ID 004 and 006) representative of the concerns expressed are provided below.



The removal of so many individual ‘paddock trees’ that are known to be important stepping stones for koalas and gliders is not acceptable.

The development plans should be changed to incorporate some of these vital ‘paddock trees’, as well as the heavily vegetated koala habitat in the northeastern corner of the site.

Extract from Submission ID 004, 021, 027 and 035

In response to Submission ID 004, scattered trees including the regrowth patch of vegetation in the north-eastern portion of the site will be removed to allow for the construction of the development, however, many of these existing paddock trees and regrowth are proposed to be retained within the 3.66 ha functional wildlife corridor (refer **PD Part A Attachment A4** and **Plan A27**). Additionally, these scattered trees will be reconnected through rehabilitation which will see reinstatement of koala habitat trees throughout the corridor (refer **PD Part A Attachment A3**).

1. Clearing of thousands of koala habitat trees and the cumulative impacts of clearing in the wider area

It is estimated that over 5,000 koala habitat trees will be lost in the development of The Trails. There has been no discernible effort to minimise clearing by using a more aesthetically pleasing design than the stark grid pattern that belongs back in the planning disasters of the 1950’s. Technologies are available today that show land can be developed in a more environmentally sustainable fashion. The State Government’s excellent publication “Koala-sensitive Design Guideline” gives many koala-sensitive design measures for planning and development activities.

The few retained trees in the central portion will no doubt be heavily impacted by the necessity of contouring to provide a drainage corridor and the installation of stormwater infrastructure so it is likely that very few, if any naturally occurring trees will survive.

It is incredible and disappointing that no thought has been given to seamlessly blend the development in with the adjacent “Bayview Conservation Reserve”. This significant reserve should be a feature to improve the lifestyle of the future residents. At the very least there should be a transition zone which would act as a buffer to the reserve. Only the poorest of planning would allow dense housing and roads hard up against the reserve.

Extract from Submission ID 006

In response to Submission ID 006 above, the estimated tree loss of 5000 is incorrect. A total of 1724 trees are proposed for removal of which 894 are koala habitat trees. A total of 520 trees are proposed to be retained within the functional wildlife corridor, of which 427 and koala habitat trees. This represents a retention of 32% of all koala habitat trees on-site.

The design of the proposed Stormwater Urban Design (WSUD) areas will be located and designed to avoid impacts to koala habitat trees where possible. The initial locations proposed as part of the concept plan have been intentionally located in cleared paddock areas of the corridor to prevent the need for unnecessary clearing. Additionally, the core of the functional wildlife corridor will be rehabilitated full-strata to the pre-clear regional ecosystem which includes a variety of koala habitat tree species.

The development concept plan and permanent mitigation measures have been proposed with specific regard to the Bayview Conservation Area. This includes the provision of koala exclusion fencing along the perimeter of the site, koala refuge poles, the provision of an unimpeded corridor link where the corridor joins to the Bayview Conservation Area, full-size fauna culvert at the eastern collector road crossing and installation of koala and Bayview Conservation Area awareness signage (refer **PD Part A Section 2.3 and 5.5**). Notably, the design of the corridor has been modified throughout the assessment process to increase



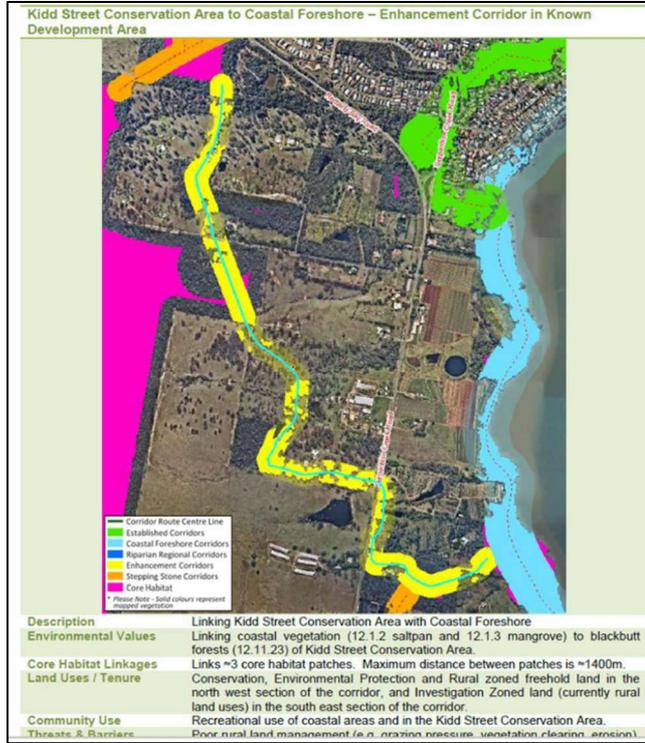
safe fauna movement, which includes widening the corridor from 50 m to 100 m wide and removing the corridor crossing along the western edge. It is noted the development design is constrained by the requirement to deliver a road within the road parcel located between Lot 12 and the Bayview Conservation Area, which limits opportunities for any additional buffering to the Bayview Conservation Area.

Both the Department of Environment and Science Koala Sensitive Design Guideline and DTMR Fauna Sensitive Transport Infrastructure Delivery Manual have been consulted in proposing these mitigation measures.

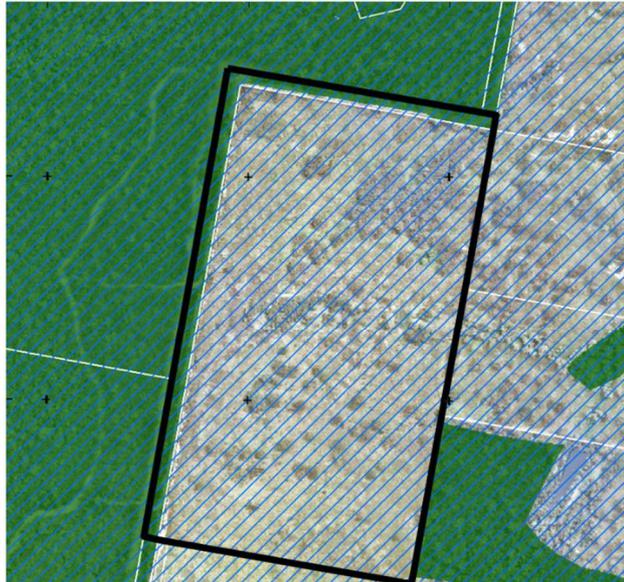


4. Clearing the ‘of State Significance’ dense forest in the northeast corner

This significant patch of forest should be protected. The ‘fauna safe area’ in the central portion should be widened to include vegetation in the northeast of the site. This important old-growth forest is mapped as being of State Significance. It also forms an important link to the Kidd Street Conservation Reserve. It is shown on the RCC Corridors Plan as part of an Enhancement Corridor (see below).



5. Isolation of the protected vegetation in the neighbouring property to the southeast



From Figure 5 Preliminary Documentation Report (Part A)

The green shows Koala Habitat Area which includes the road reserve and shows the important patch of Koala Habitat to the southeast of the development site. This should be linked to the Conservation Reserve by extending the central corridor to the south.

Extracts from Submission ID 006 and 035



Submission ID 006 and 035 raised two points: 1) the development design did not consider the location of the 'Enhancement Corridor' identified in the first map above and 2) has failed in broader planning to provide connectivity with adjoining habitat areas. The first map shown above is extracted from the Redland City Council Wildlife Connections Plan 2018-2028. As identified in the plan under the section titled 'Objectives of the Plan' it is stated: "This non-statutory plan will form a guide to strengthen corridors by recognising opportunities for the management and enhancement of existing Council reserves and managed land. This plan will also be used to inform Council's extension and community education programs, conservation land acquisitions program and assist in identifying potential offset sites. A review of City Plan will also be undertaken to determine any necessary consequential amendments."

As highlighted above, the plan is a non-regulatory document and high-level planning tool, of which the primary function is to identify opportunities for the enhancement and protection of wildlife corridors for potential use in planning scheme changes. The plan provides a broad overview of potential corridor locations which is necessary as a high-level planning exercise, however, the ultimate location of corridors is informed only by the RCC City Plan overlays which are then refined by RCC at the local scale. RCC have an active role in deciding the location and shape of their corridors as part of development applications which has occurred as part of this application and reflected in the Preliminary Approval (MCU22/0013) administered by RCC.

The corridor to be delivered as part of this development (EPBC 2021/9047) is substantially greater in size than that identified in the RCC Wildlife Connections Plan and aligns with the site's central drainage path. The corridor will provide continuity with the adjoining corridor being delivered under the Over 50s Lifestyle Community Development (EPBC 2021/9052) to the east (refer **PD Part A Section 5.3.1** and **Plan A26**). While a collector road is proposed to run along the eastern boundary of the site as part of the development footprint and intersect the corridor, a full-size fauna movement culvert will be delivered at the point of intersection in accordance with the DTMR Fauna Sensitive Transport Infrastructure Delivery Manual to ensure all species including larger macropods will be able to move safely and freely throughout the broader corridor (refer **PD Part A Attachment A6**). Notably, the corridor provides connectivity to Bayview Conservation Area and additional provisions such as koala exclusion fencing and koala refuge poles will be provided along the perimeter of the development to prevent koala and other fauna from crossing into development areas.

Although the EPBC assessment must technically apply the listings in force at the time of referral, the current Endangered status is highly relevant when considering precaution, residual risk, offsets, and the public interest in preventing further decline of these species. Furthermore, the proposed development is fundamentally inconsistent with established South East Queensland (SEQ) koala conservation and recovery strategies, including:

- South East Queensland Koala Conservation Strategy
- Queensland Koala Conservation Strategy
- Redland City Koala Conservation Plan

These strategies prioritise habitat retention, connectivity, avoidance of incremental loss, and minimisation of urban development impacts in mapped koala habitat. **The proposed clearing of 20.2 hectares of koala habitat directly conflicts with these objectives.** Furthermore, the proposal to clear this vast amount of high-value koala and greater glider habitat, which is adjacent to the Bayview Conservation Area, would **result in irreversible loss of mature eucalypt habitat and fragmentation of an already stressed landscape.**

Extract from Submission ID 011

Submission ID 011 above stated that the development proposal is inconsistent from an avoidance and minimisation standpoint with State and Local strategies. It is noted the strategy document titled 'Queensland Koala Conservation Strategy' above does not exist. Similarly, a plan titled the 'Redland City Koala Conservation Plan' also does not exist. It is considered the author is referring to the *Redland Koala Conservation Strategy 2016*. The SEQ Koala Conservation Strategy is a high-level planning instrument which informs regulations for the protection of koala habitat at the State level. It is noted at the State level



the site is not mapped as containing Koala Habitat Area mapping with the exception of the road parcel. Habitat within the road parcel is required to be cleared to facilitate the construction of the road and will be performed under exempted development provisions.

Response to Theme 6

A total of seven submissions were received which referenced the presence of a Wedge-tailed Eagle / raptor nest on-site and concerns regarding potential impacts. A representative extract of these submissions is provided below.

The raptor nest is referred to in the majority of the submissions received as a Wedge-tailed Eagle (*Aquila audax*) nest. The raptor nest was identified by SH ecologists during ecological surveys in 2021, however, could not be confirmed as Wedge-tailed Eagle nest. The location of, and description of the nest, was provided in the referral material provided at **PD Part B**. During surveys undertaken in 2021, the nest was not observed to be active and in all subsequent surveys, no observations of active raptor nest activity have been recorded on-site.

Wedge-tailed Eagles are listed as a Least Concern species at the State level and are not a threatened species under the EPBC Act, therefore do not require assessment under the EPBC Act.

Appropriate protocols will be implemented prior to any works occurring to ensure impacts to the raptor nest are minimised and avoided. This includes specific pre-clearance surveys completed by a qualified fauna spotter catcher and the implementation of specific management plans where required under the Queensland *Nature Conservation Act 1994* and fauna spotter catcher permits.

already cleared areas of the site, thereby avoiding unnecessary additional habitat loss. In addition, a **raptor nest located within the site must be protected**, with an appropriately sized exclusion buffer established to ensure that **Wedge-tailed Eagles are not disturbed during construction or related activities**.

Extract from Submission ID 011

A raptor nest located on the site must be protected and have an acceptable exclusion area around it, so the Wedgetail Eagles will not be disturbed during construction.

Extract from Submission ID 004

I also note that there is evidence that a raptor nesting site is located on the Trails development site in an area that is proposed for clearing, which has not been addressed in the Saunders Havill's draft report

Extract from Submission ID 028

Response to Theme 7

One submission received cited the development would result in the loss of ecosystem services (refer extract below). The site represents a highly modified and disturbed site which contains a modified drainage line. Appropriate design measures will be incorporated into the development design including Water Sensitive Urban Design and the provision of a 3.66 ha open space area which will be planted with habitat trees that will serve to provide function as a drainage and carbon sink. The provision of the 82.21 ha offset site will also function to offset impacts such as carbon sequestration through the planting of trees.



Once destroyed, these complex ecosystems cannot be readily replaced or offset; the loss is permanent and cumulative. Protecting this land aligns with evidence-based environmental management, Australia's biodiversity and climate commitments, and the clear public interest in safeguarding ecosystems that provide essential services such as carbon sequestration, water regulation, and flood mitigation.

Extract from Submission ID 015

Response to Theme 8

One submission opposed the action on the basis that the sewerage system would not utilise modern technology. To clarify this point, only modern sewerage infrastructure will be incorporated as part of the development's overall infrastructure. Notably, sewer pump stations are included in the design for the Shoreline Urban Village Development (EPBC 2016/7776) and a Wastewater Treatment Plant was recently constructed and became operational within Redland Bay (EPBC 2020/8849).

Despite buyers being under the impression that they had sewerage - it appears they - and many residents in the Redlands - did not know their so-called "sewerage system" was no better than a form of the 1950's

" NIGHT SOIL" CARTERS

It is my understanding that the sewerage at the Shoreline Development is trucked away to sewerage plants for treatment elsewhere.

THIS IS NOT ACCEPTABLE.

THIS ACTIVITY MUST NOT BE REPEATED IN THE REDLANDS.

Extract from Submission ID 032

